

Comments	Appraisal	Response
<p>activities do not cause unreasonable disturbance."</p> <p>The concept of "nearby local" needs expanding to take account of the pedestrianisation and the surrounding traffic restrictions in Bradford city centre, which pushes favoured private hire taxi pick-up points well away from late-night venues. Bradford Metropolitan District Council (BMDC) intend to expand the pedestrianised zone in the near future.</p> <p>This Summer there has been a massive escalation in antisocial and rowdy drunken behaviour on Market Street throughout the small hours of the night. This appears to be 'transplanted' from late-night venues much further up town: groups were often clearly audible moving down upper Bank Street or down Ivegate.</p> <p>6.6 THE PREVENTION OF PUBLIC NUISANCE</p> <p>"In considering all licence applications where relevant representations have been received, the Council's Licensing Authority will consider the adequacy of measures proposed to deal with the potential for undue disturbance, public nuisance and/or anti-social behaviour having regard to all the circumstances of the application ...</p> <p>g. The arrangements for liaising with providers of public transport during the proposed hours of opening, including taxis and private hire vehicle operators;</p> <p>h. Whether the licensed taxi or private hire vehicles serving patrons are likely to disturb local residents and the measures proposed by the applicant to prevent disturbance from this source".</p>	<p>Pedestrianisation is primarily a highways/planning issue and cannot be addressed through the Licensing Policy.</p> <p>The Act allows responsible authorities or other persons to apply for review of licences at any time where there are grounds for doing so.</p> <p>Policy wording.</p> <p>Policy wording.</p> <p>Policy wording.</p>	

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<p>The policy needs to be much more robust in order to "prevent public nuisance". Pedestrianisation and the surrounding traffic restrictions in Bradford city centre have pushed favoured private hire taxi pick-up points well away from late-night venues. BMDC intend to expand the pedestrianised zone in the near future.</p> <p>This Summer there has been a huge escalation in private hire vehicles using Market Street as an informal taxi rank despite the traffic restrictions, throughout the small hours of the night. This appears to be 'transplanted' from late-night venues much further up town.</p> <p>BMDC Taxi Licensing Enforcement do not patrol the late-night economy, and require licence plate/ description of each vehicle to action complaints. This is impossible at night with headlights on, or from a window above the vehicle.</p> <p>8.2 PRIME ENTERTAINMENT AREAS</p> <p>"The Council's Licensing Authority recognises that parts of the District have developed over time to be the prime areas for entertainment venues, cinemas, restaurants etc ... These areas are generally away from large concentrations of residential properties, as they are in or near to the City or Town Centres."</p> <p>This is not correct. The Bradford Centre Prime Entertainment Area encompasses large concentrations of homes - vertical rather than horizontal - and many of the existing apartment blocks were converted between ten and twenty years ago.</p> <p>Currently - There are one hundred and twenty apartments on my city block</p>	<p>Pedestrianisation is primarily a highways/planning issue and cannot be addressed through the Licensing Policy.</p> <p>Noted.</p> <p>Noted. Not a Licensing Policy issue.</p> <p>Policy wording.</p> <p>Central to the Licensing Act 2003 is the issue of balancing the rights of local businesses and musicians and those who enjoy various types of entertainment, with the rights of residents and other businesses</p>	

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<p>alone</p> <ul style="list-style-type: none"> - There are upwards of two hundred apartments in the vicinity of the pubs on Ivegate - There are similarly large concentrations in Little Germany, and will be at the bottom of Thornton Road - The majority of the longstanding apartments are one and a half to two bedrooms, and an average of two occupants - There are many thousands of residents of Bradford city centre in total. <p>Further large conversions to residential are in progress (eg. Arndale House, High Point, Garden and Junction Mills) and will likely be completed well before this policy document is reviewed in 2025.</p> <p>8.4 PRIME ENTERTAINMENT AREAS</p> <p>"Bradford Council as a whole continues to encourage more people to live in the city and town centres. The proximity of such settlements will be taken into account when considering applications in Prime Entertainment Areas ...</p> <p>However, the Council's Licensing Authority takes the view that those who choose to live in these areas will generally be expected to accept the normal and reasonable activities associated with living close to such venues. This fact will therefore be taken into consideration when considering representations with regard to licence applications."</p> <p>The concepts of "living close to" and "proximity of" need expanding to take account of pedestrianisation and the surrounding traffic restrictions in Bradford city centre pushing favoured private hire taxi pick-up points well away from late-night</p>	<p>etc</p> <p>Noted.</p> <p>Policy wording.</p> <p>Policy wording.</p> <p>Pedestrianisation is primarily a highways/planning issue and cannot be addressed through the Licensing Policy.</p>	

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<p>venues.</p> <p>Some residents took occupation when the late-night economy was centred at the West End not in the retail district, or when the evening economy was centred on Ivegate but not on North Parade. Other residents took occupation near hospitality venues that close before midnight, but did not "choose to [live] close to" nightclubs and cocktail bars serving until 5am.</p> <p>Whilst acknowledging the qualification of "normal and reasonable", without a police presence this is not being monitored through the night. The onus is still on residents of Prime Entertainment Areas to prove that a problem exists, not for the authorities to minimise the risk of public nuisance or antisocial behaviour. Lessons have not been learned from Funkys/ Titos.</p> <p>8.6 CUMULATIVE IMPACT ASSESSMENTS</p> <p>"Evidence which may be relevant to the Licensing Authority when considering this matter may include:</p> <ul style="list-style-type: none"> - Statistics on local anti-social behaviour offences ... - Complaints recorded by the Local or Licensing authority, which may include complaints raised by local residents or residents' associations; - Residents' questionnaires; - Evidence from local councillors; - evidence obtained through local consultation." <p>The statistics on anti-social behaviour in Bradford Centre greatly underestimate the scale of the current problem. This Summer incidents in the city centre have been numerous, but not</p>	<p>The Act allows responsible authorities or other persons to apply for review of licences at any time where there are grounds for doing so.</p> <p>Noted.</p> <p>Policy wording.</p> <p>.</p> <p>Noted.</p>	

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<p>longlasting individually. Even when reported by residents they are frequently not recorded by West Yorkshire Police due to insufficient evidence.</p> <ul style="list-style-type: none"> - WYP Neighbourhood Policing Team clocks off at 10pm or 11pm - the problem behaviour is throughout the small hours of the night - 101 is slow to get through to at peak times - many here are 'digitally excluded' or rely on the (daytime only) Central Library computer facilities - WYP requires a visual description of suspects to record incidents of antisocial behaviour - BMDC Taxi Licensing Enforcement do not patrol the late-night economy - BMDC Taxi Licensing Enforcement require licence plate/ description of each vehicle to action complaints. <p>Furthermore, there is very limited engagement or consultation with city centre residents by BMDC, so I cannot see how the cumulative impact can be properly assessed using these criteria, because</p> <ul style="list-style-type: none"> - BMDC public consultations do not differentiate between city centre residents, district residents and all other visitors or users - Consultations and many other opportunities to make representations are online-only - Neighbourhood Forums are not held in BD1 - Ward Councillor surgeries are not held in BD1 - The City Centre Residents Association is long defunct - Residents of high-rise apartment blocks are known to be a 'hard to reach' group, but not recognised as such by BMDC. <p>8.7 CUMULATIVE IMPACT ASSESSMENTS</p>	<p>Relevant evidence is referred to in Licensing Act 2003 guidance which is published by the Home Office.</p>	

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<p>"The Council's Licensing Authority does not intend to operate a quota system that would effectively pre-determine any application in particular areas nor will it seek to impose general limitations on trading hours in particular areas."</p>	<p>Policy wording.</p>	
<p>Currently WYP Neighbourhood Policing Team clocks off at 10pm or 11pm and the Bradford city centre CCTV network is not consistently monitored overnight. There is therefore no consistent deterrent to, reduction or prevention of antisocial behaviour, public nuisance or disorder in the Bradford Centre Prime Entertainment Area.</p>	<p>Noted.</p>	
<p>The onus is still on residents of Prime Entertainment Areas to prove that a problem exists, not on the authorities to minimise the risk of public nuisance or antisocial behaviour. Lessons have not been learned from Funkys/ Titos.</p>	<p>Noted.</p>	
<p>The combined impact of BMDC Licensing policies not to have a late-night levy towards "policing the late night economy and the reduction or prevention of crime and disorder" (section 24) AND not to "impose general limitations on trading hours" in Prime Entertainment Areas (section 8.7) reinforces this.</p>	<p>Noted.</p>	
<p>9.7 SPECIAL EVENTS IN THE OPEN AIR OR TEMPORARY STRUCTURES</p>		
<p>"The following issues will, in most cases, need to be addressed ... Early liaison and discussion with local residents on how to minimise disturbance and disruption to them."</p>	<p>Policy wording.</p>	
<p>This is insubstantial and ineffective in the Bradford Centre Prime Entertainment Area. There needs to be a much more robust</p>	<p>Noted.</p>	

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<p>policy in place to safeguard city centre residents, considering that</p> <ul style="list-style-type: none"> - Residents of high-rise apartment blocks are known to be a 'hard to reach' group, but not recognised as such by BMDC - Neighbourhood Forums are not held in BD1 - Ward Councillor surgeries are not held in BD1 - The City Centre Residents Association is long defunct - BMDC Environmental Health Officers are not on duty during weekend music events. <p>DISTURBANCE</p> <p>In November 2012 the BDMC Major Events Programme Manager, Vanessa Mitchell, assured residents that "we are currently drafting a new policy and terms and conditions of hire for the use of City Park. This will take into account issues around noise etc and we will work closely with event organisers when planning the site and position of any PA equipment ..."</p> <p>This never happened. PA equipment continues to be located at the residential end of Centenary Square, perpendicular to or facing towards the blocks of flats. Weekend music events are consistently far louder or more bass-y than at the Friday sound-check, and run far later into the night than a decade ago.</p> <p>In June 2019 I wrote of Bradford Pride and the Windrush Generation event "My triple-glazed windows have been closed ... The music is still ear-bleedingly loud and impossible to drown out, not just the bass but every note and every word ... my furniture is vibrating."</p> <p>Over the years I have sought out Event Organisers on the day to request that the volume or the bass be reduced. All bar one were</p>	<p>Noted.</p> <p>Noted.</p> <p>Noted.</p> <p>Noted.</p>	

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<p>polite but unwilling to reduce the volume or bass at all, referring me back to BMDC as having licensed the event. On a number of occasions Event Organisers freely admitted that they had been approached by other city centre residents that day.</p> <p>DISRUPTION</p> <p>In September 2019 a number of city centre roads - including Market Street - were closed to all traffic for parts of two consecutive weekends, for the Big Bike Ride and for the UCI Road World Championships. On the first occasion residents were not informed at all, on the second occasion residents only received a letter from BMDC the day before the event. Not being informed at all when our road is to be closed for a special event occurs at least once a year.</p> <p>It is therefore critical that a far more robust policy on communication, "liaison and discussion" is introduced to "minimise disturbance and disruption" to residents of Prime Entertainment Areas.</p> <p>24 HELPFUL TERMINOLOGY</p> <p>"Late Night Levy</p> <p>A late night levy enables licensing authorities to charge a levy to persons who are licensed to sell alcohol late at night in the authority's area, as a means of raising a contribution towards the costs of policing the late night economy and the reduction or prevention of crime and disorder ...</p> <p>There is a prescribed consultation and adoption process to follow in order to implement a late night levy. The Bradford Licensing Authority does not currently have a late night levy. The</p>	<p>Road Closures are Highway issues.</p> <p>Noted.</p> <p>Policy wording.</p> <p>Policy wording.</p>	

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<p>requirement for a levy will be kept under review during the lifetime of this policy."</p> <p>There is very limited engagement or consultation with residents of Bradford city centre (comments, section 8.6) so the need for a late-night police presence cannot be properly assessed or reviewed by BMDC.</p> <p>The onus is still on residents of Prime Entertainment Areas to prove that a problem exists, not on the authorities to minimise public nuisance or antisocial behaviour. Lessons have not been learned from Funkys/ Titos.</p> <p>The combined impact of BMDC Licensing policies not to have a late-night levy towards "policing the late night economy and the reduction or prevention of crime and disorder" (section 24) AND not to "impose general limitations on trading hours" in Prime Entertainment Areas (section 8.7) reinforces this.</p>	<p>Noted.</p> <p>Noted.</p> <p>Noted.</p>	
<p>Residents Comment -I have been a residential leaseholder in Bradford city centre since 2002. Having read the draft policy document, I would like to raise my concerns about the increase in anti-social behaviour and vandalism over the past few years, especially after 11pm.</p> <p>A neighbourhood police presence in the city centre overnight would make residents and business owners feel safer - and help to reduce anti-social behaviour and vandalism to residential and business properties.</p> <p>As the city bids to become the U.K. Capital Of Culture for 2025,</p>	<p>Noted.</p> <p>This is a police resource issue and not one that can be addressed though licensing policy.</p> <p>This is a police resource issue</p>	<p>All comments noted. No amendment to the policy document is proposed.</p>

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having a city-centre which feels vibrant, safe and well-policed (at all hours) should be a priority.	and not one that can be addressed though licensing policy.	
<p>Business Comment -There needs to be greater police presence in prime pedestrian areas where customers are walking to and from transportation and walking between different venues and different parts of town such as City Park/Centenary Square, St Georges Hall, Bradford Interchange, Hall Ings and Jacobs Well, the West End and Broadway/Market Street and Forster Square.</p> <p>John Street, Northgate and Rawson Square is another problem area where anti social behaviour is highly prominent and shops in the area are selling alcohol to problem users.</p> <p>They are increasingly making shoppers and visitors to the area feel unsafe as well as shopkeepers and traders who are working so hard to make their businesses survive in a really tough climate.</p> <p>There needs to be a regular police presence in this area to help provide reassurance that the area is safe.</p>	<p>This is a police resource issue and not one that can be addressed though licensing policy.</p> <p>Noted.</p> <p>Noted.</p> <p>Noted.</p>	<p>All comments noted. No amendment to the policy is proposed.</p>