

Dear Officers

Response on behalf of Bristol at Night: Licensing and Regulatory sub-group

We are writing to you on behalf of the Bristol At Night sub-group responsible for engaging in consultations on licensing and other regulatory matters. This response is in regard to the current consultation on re-introducing a city centre cumulative impact zone ('CIZ').

Effects of Covi-19 and recession on leisure businesses in the City Centre

One of the most significant effects of the covid crisis has been the exodus from city centres of office and other workers, students taking tuition online and lack of visitors coming into the city centre. The effects of lockdown and the ever-changing rules has also resulted in destination venues, such as music/ concert, theatres, cinemas and nightclub premises having to close or provide drastically restricted offers. Other hospitality businesses have had to scratch a living where they can from those people remaining and willing to go out, albeit with reduced capacities and fewer permitted activities. Self-employed people in the creative spaces, along with the staff in these businesses have borne the brunt of the crisis.

The lockdown and restrictions on re-opening have had a disproportionate effect on businesses within city centres across the country. At this time, it is impossible to estimate how many of these businesses will survive into 2021. Already there are significant insolvencies and restructures of well-known hospitality and retail offers and this is expected to increase as the help made available to businesses early in the pandemic dries up. This will likely lead to the permanent shuttering of businesses in city centres and lapses of premises licences when they go.

A report released on the eve of London going into tier two lockdown estimates that 200,000 hospitality workers are likely to lose their jobs on the weekend of 17 and 18 October as a result of the stricter measures and end to support for workers. Bristol is likely to face a similar lockdown during what is a surge in cases as part of the '2nd wave' being seen nationally. It is not unreasonable to expect a similar result when Bristol takes its turn.

This is not to mention the likely effects of a 'circuit breaker' lockdown that most people expect to happen at some point before Christmas.

The reality therefore is that whatever the evidential case there was for a city centre CIZ prior to covid and the recession, it is no longer relevant to the economic situation faced now. As such, any decision to re-introduce a city centre CIZ must be seen through this new lens and not the 'old normal.' It is likely, if not certain, that what might have been anticipated to be the relevant crime and disorder case for re-introducing a city centre CIZ at the turn of 2020, is simply not a good indication of what can be expected heading into 2021.

Recommendation

There is no statutory requirement for this consultation to be determined in the timeframe currently established. As such, we would argue that at the present time, and that with the likely serious effects of covid, brexit and recession not fully understood, anything that is a barrier to business at this time should be considered through the lens of the immediate situation and not based on data relevant to a different world. At the end of this 'perfect storm' there are likely to be fewer operators, fewer licences, fewer people living in the city, fewer people coming into the city, fewer workers... the list goes on. Therefore playing by the pre-covid rules and on pre-covid evidence is no basis for a fair and proper assessment of the need for a city centre CIZ.

Our proposal therefore is to pause now and look to recommence the consultation once the outcomes of this unique period in history are better understood. We would expect that this will be somewhere toward the end of 2021.

In the interim, the police and other responsible authorities, as well as residents, can still object to licence applications or variations on cumulative impact grounds without the need for a CIP to be in place. Where needed the licensing sub committees can judge each application on its merits.

We trust that these comments will be taken into account in determining the best course of action for all parties at this time.

Kind regards

Piers Warne (for and on behalf of the aforementioned group)

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