



**Consultation Response of Punch Taverns PLC to the Licensing Act
2003 Statement of Licensing Policy of Reading Borough Council
(Cumulative Impact Area)**

Introduction

Punch Taverns PLC is a Pub Operator with a portfolio of over 7,600 premises within the United Kingdom. Punch Taverns PLC currently have three premises that falls within the proposed Cumulative Impact area adopted by the council, with twelve further premises just outside that area. A modest increase in the designed cumulative impact area could bring these within the policy.

Response to consultation on Special Policy

Section 4 of the Council's Statement of Licensing Policy deals with its Cumulative Impact Policy.

Paragraph 5 of Section 4 of the Statement of Licensing Policy states:

"Regard will be given to the individual characteristics of the premises concerned within a given area. It is recognised that pubs, nightclubs, restaurants, hotels, theatres, and other clubs all sell alcohol, serve food and provide entertainment but with contrasting styles and characteristics. Proper regard will be had to those differences and the impact they are likely to have on the local community."

In the absence of evidence from the police as to the success or otherwise of the adoption of a Saturation Policy, it is difficult to comment on whether there is a need for such a special policy.

Punch Taverns' response is based on the assumption that the cumulative impact policy will be implemented.

On the basis that the cumulative impact policy is implemented, Punch Taverns would submit as follows:

1. It is accepted and agreed that there should be a rebuttable presumption that applications for new Premises Licences or Club Certificates within the special policy area should be refused if relevant representations are received.

2. Material variations should be deemed to exclude the following

Applications which seek to vary the hours which existing premises within the special policy area can undertake licensable activities. In this regard it is submitted that the avoidance of fixed and artificially early closing times assist in preventing rapid binge drinking and the possibility of disorder and disturbance when large numbers of customers are required to leave premises simultaneously.

The Department of Culture, Media and Sport state in the guidance issued under Section 182 of the Licensing Act 2003 (paragraph 6.6) that "Above all, Licensing Authorities should not fix pre-determined closing times for particular areas"

3. Material variations should be deemed to include the following:

- 3.1 Applications which seek to increase the licensed area of a premises (be this an increase to the licensed area indoors or outdoors) by say 10% or more (to allow for modest variations to premises due to refurbishments, etc.).

PUNCH TAVERNS
17th November 2009