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Police Observations to the Swansea Council Cumulative Impact Policy

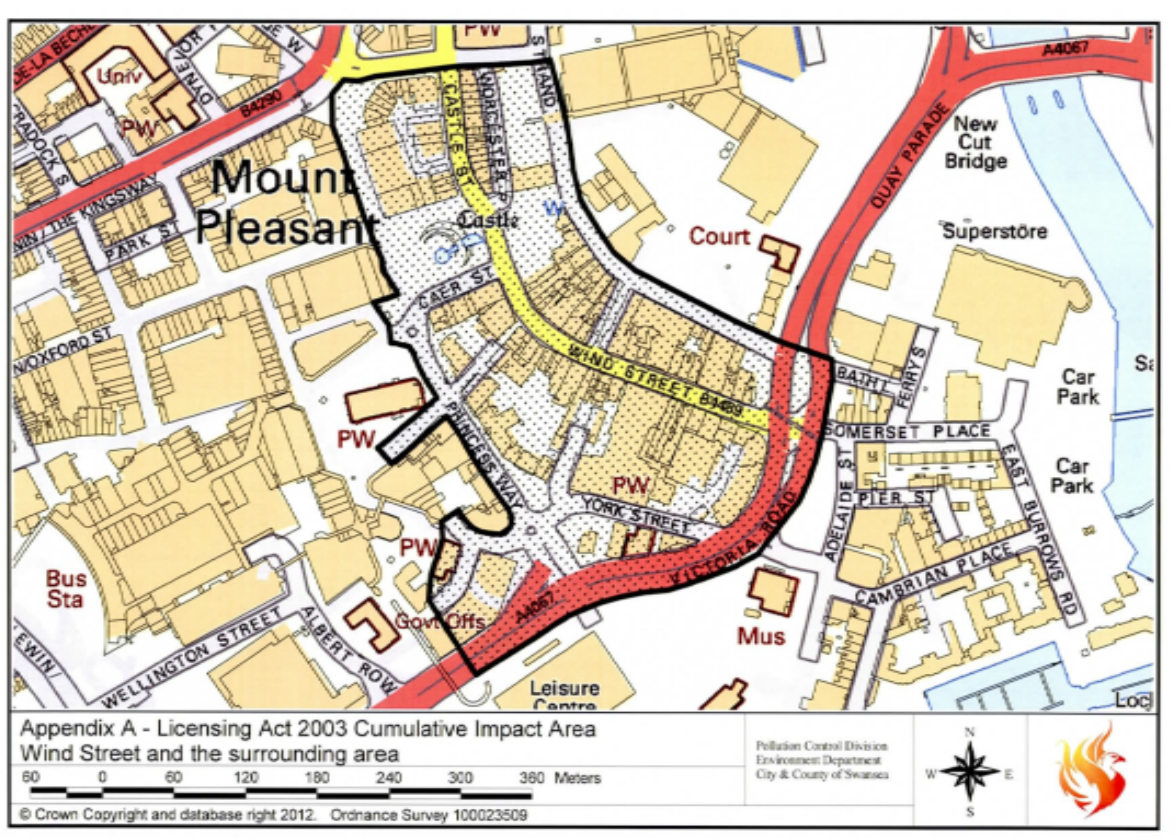
I have been requested to provide an overview of the Swansea Council Cumulative Impact Policy and how it is utilised operationally within the South Wales Police, Swansea Basic Command Unit. The overview will examine trends in all aspects of crime, along with violence offences, drunk and disorderly offences and anti-social behaviour. This overview will be based on police occurrence figures along with the professional observations of police licensing officers who have been responsible for interpreting and implementing the policy on an operational level.

The current Swansea City Council Statement of Policy came in to effect in July 2013 and was reviewed on the 26th January 2017. Paragraph 6.19 of the document refers to Cumulative Impact Special Saturation Policy for three specific areas

- Wind Street and the surrounding area
- The Kingsway and the surrounding area
- High Street and College Street

Since that time, South Wales Police has referred to this policy when considering a licence application from any licensed premises within these three zones, based on the four licensing objectives of Crime and Disorder, Public Safety, Prevention of Public Nuisance and Protection of Children from harm. Under the Guidance issued by the Secretary of State under Section 182 of the Licensing Act 2003, paragraph 1.4 of the guidance stated that the promotion of the statutory objectives is a paramount consideration at all times.

Wind Street and the surrounding area



Wind Street over the past 3 years has seen a significant amount of investment in to its licensed premises both from large organisations and small independent operators. These venues have improved the feel of the area, promoting a more sophisticated alcohol provision, focusing on cocktails, premium and craft beers. This is a welcome change from the traditional wet led, vertical drinking venues which focused on cheap drink promotions, resulting in a drunken party atmosphere that used to plague the area. The addition of diverse food operations within Princess Way, Castle Street, The Strand and York Street have promoted the daytime and evening economy and these licensed premises have worked within the cumulative impact policy and demonstrated their ability to comply with the policy exemptions.

However, there are still a number of significant challenges that Wind Street and surrounding area faces. Recent analysis has shown that between 2016 and 2017 there has been a significant increase in crime and disorder figures. Between 2016 and 2017, there has been a 78% increase in the amount of crime recorded within the area. This has resulted in an increase of 63% in violent crime which includes offences of violence with injury, violence without injury, robbery and public order. This is in contrast to a reduction of 15% in recorded crime between 2014 and 2016 and static levels of violent crime between 2014 and 2016.

The sudden increase in recorded crime and violent crime can be partly attributed to changes in criming procedures, where incidents are now crimed at first contact at the forces public service centre. It does raise the question whether the latest figures actually provide a more accurate reflection of true crime levels compared to previous years. It is also important to highlight that crimes form only a small part of the demand on police resources within the Wind Street area. Due to the large numbers of people within the night time economy, South Wales Police deal with numerous non crime related incidents, along with significant numbers of incidents relating to the vulnerability of people within the night time economy.

Wind Street, like many other areas of the country has experienced how pre loading, and the subsequent late walk up in to the Night Time Economy has affected businesses and the policing operation. It is now a regular occurrence to see the vast majority of people entering the night time economy from 2330hrs onwards. Many of these people will have consumed a significant amount of alcohol which provides significant challenges to licensed premises and the police. Licensed premises are having to strike a balance between welcoming these customers in to the venues from a business perspective, whilst ensuring that they are promoting the licensing objectives by promoting responsible drinking.

A direct consequence of the late walk up, is the endless desire for licensed premises within Wind Street and the surrounding areas to seek a competitive advantage on the numerous licensed premises around them by requesting later operating hours. These applications, which will increase the saturation levels, directly challenges the cumulative impact policy and has resulted in South Wales Police submitting representations to object to the application in its entirety or to its operating hours contained within it.

It is anticipated that this practice of requesting later hours will continue, with venues either unwilling or unable to adequately promote their early evening provision, therefore focusing on the later hours which causes significant issues for the policing operation of the City especially when there are significant resource and financial constraints placed on the force and partner agencies.

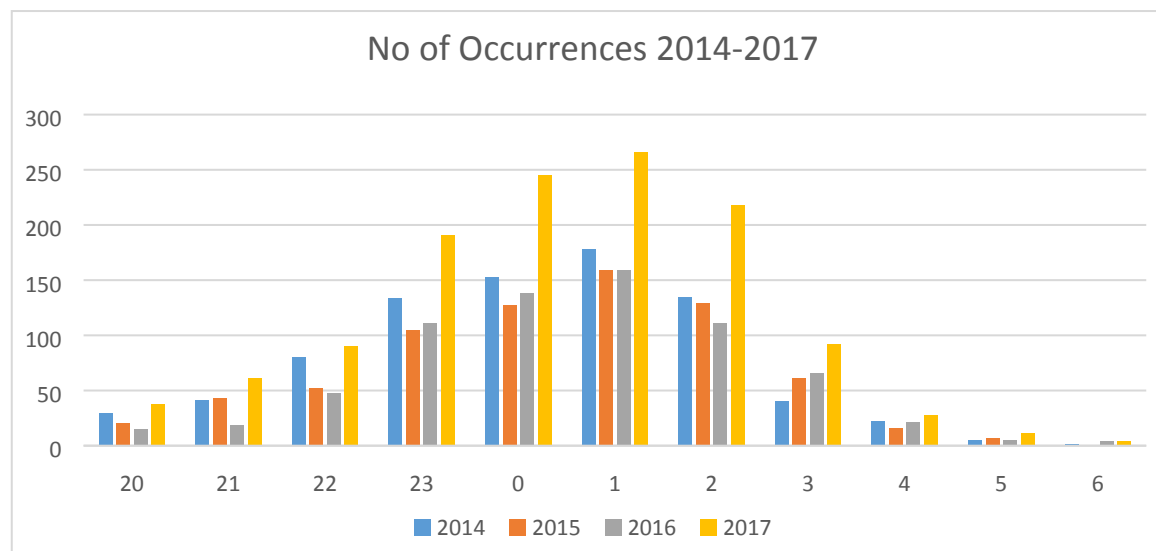
South Wales Police submit that to relax or amend the cumulative impact policy for Wind Street or the surrounding streets, will lead to a significant increase in the saturation levels of licensed premises and increase levels of crime and disorder. The following data will demonstrate the increases in crime and disorder and the subsequent concerns surrounding public safety.

Wind Street and Surrounding Areas – All Recorded Crime (2014-2017)

Hours of Day (8pm to 7am)

	20	21	22	23	0	1	2	3	4	5	6	Total
2014	29	41	80	134	153	178	135	40	22	5	1	818
2015	20	43	52	105	127	159	129	61	16	7	0	719
2016	15	19	48	111	138	159	111	66	21	5	4	697
2017	38	61	90	191	245	266	218	92	28	11	4	1244
Total	102	164	270	541	663	762	593	259	87	28	9	3478
2016-2017%	153%	221%	88%	72%	78%	67%	96%	39%	33%	120%	0	78%

The red blocks illustrate that the busiest period for all recorded crime is between 11pm and 3am. The highlighted red percentages show the increase in recorded crime between 8pm and 7am and shows that recorded crime has increased by a total of 78% between 2016 and 2017. This is contrast to the reduction of 15% between 2014 and 2016. It is also important to note, the year on year increase in recorded crime levels from 3am onwards, which illustrates the consequence of the late walk up in to the night time economy.

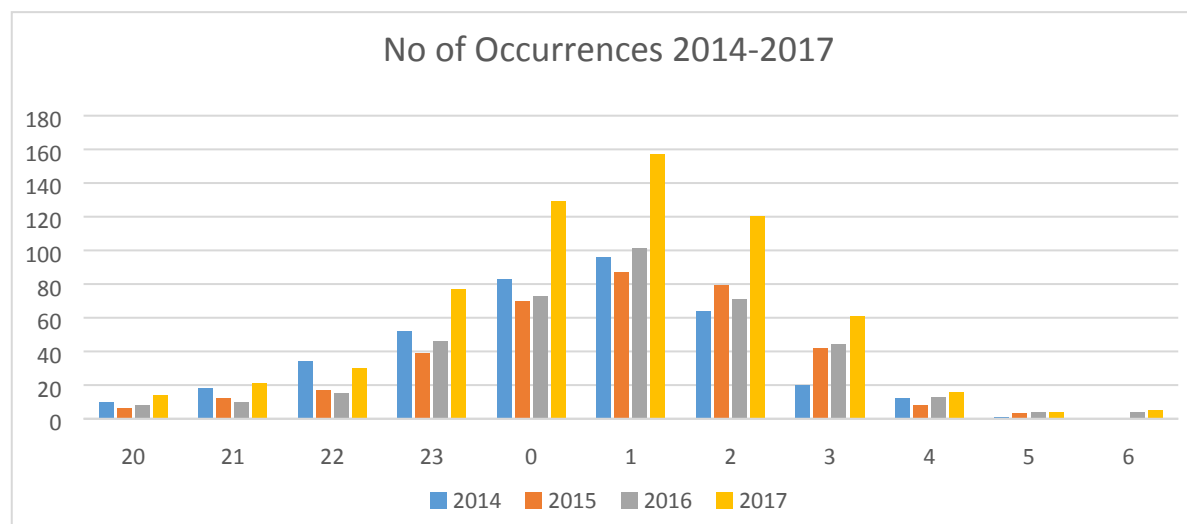


Wind Street and Surrounding Areas – Violent Crime (Violence with injury, violence without injury, robbery, public order - 2014-2017)

Hours of Day (8pm to 7am)

	20	21	22	23	0	1	2	3	4	5	6	Total
2014	10	18	34	52	83	96	64	20	12	1	0	390
2015	6	12	17	39	70	87	79	42	8	3	0	363
2016	8	10	15	46	73	101	71	44	13	4	4	389
2017	14	21	30	77	129	157	120	61	16	4	5	634
Total	38	61	96	214	355	441	334	167	49	12	9	1776
2016-2017%	75%	110%	100%	67%	77%	55%	69%	39%	23%	0	25%	63%

The red blocks illustrate that the busiest period for all recorded crime is between 11pm and 3am. The highlighted red percentages show the increase in violent crime between 8pm and 7am and shows that violent crime has increased by a total of 63% between 2016 and 2017. This is in contrast to the static levels of violent crime between 2014 and 2016. It is also important to again note, the year on year increase in recorded crime levels from 3am onwards, which further illustrates the consequence of the late walk up in to the night time economy.

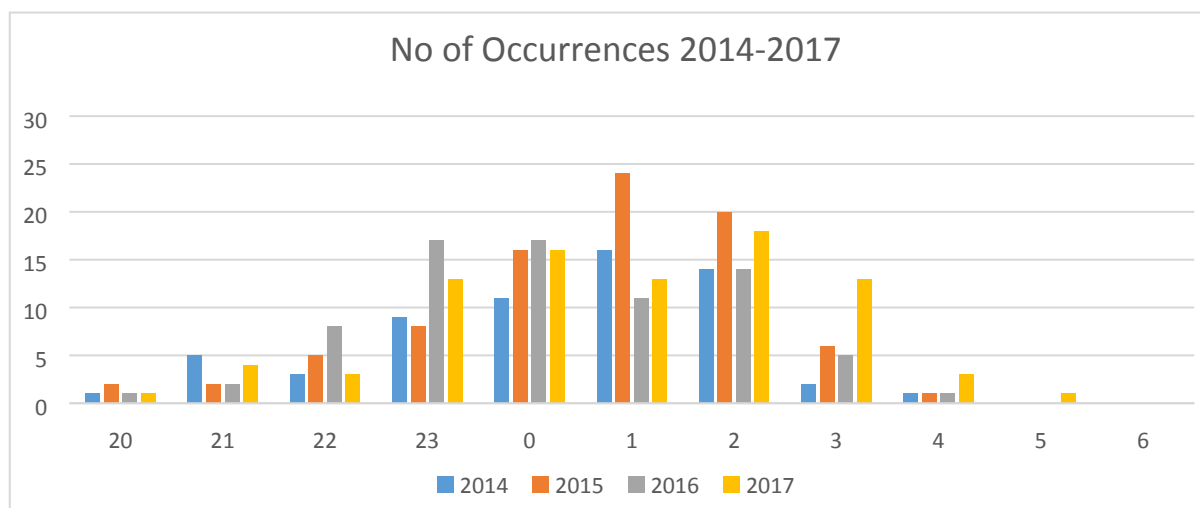


Wind Street and Surrounding Areas – Drunk and Disorderly (2014-2017)

Hours of Day (8pm to 7am)

	20	21	22	23	0	1	2	3	4	5	6	Total
2014	1	5	3	9	11	16	14	2	1	0	0	62
2015	2	2	5	8	16	24	20	6	1	0	0	84
2016	1	2	8	17	17	11	14	5	1	0	0	76
2017	1	4	3	13	16	13	18	13	3	1	0	85
Total	5	13	19	47	60	64	66	26	6	1	0	307

The red blocks illustrate that the busiest period for drunk and disorderly crimes is between 11pm and 3am. The figures show a total increase of 37% of drunk and disorderly crimes between 8pm and 7am between 2016 and 2017. Again, it is important to note, the year on year increase in drunk and disorderly crimes from 3am onwards, which further illustrates the consequence of the late walk up in to the night time economy.

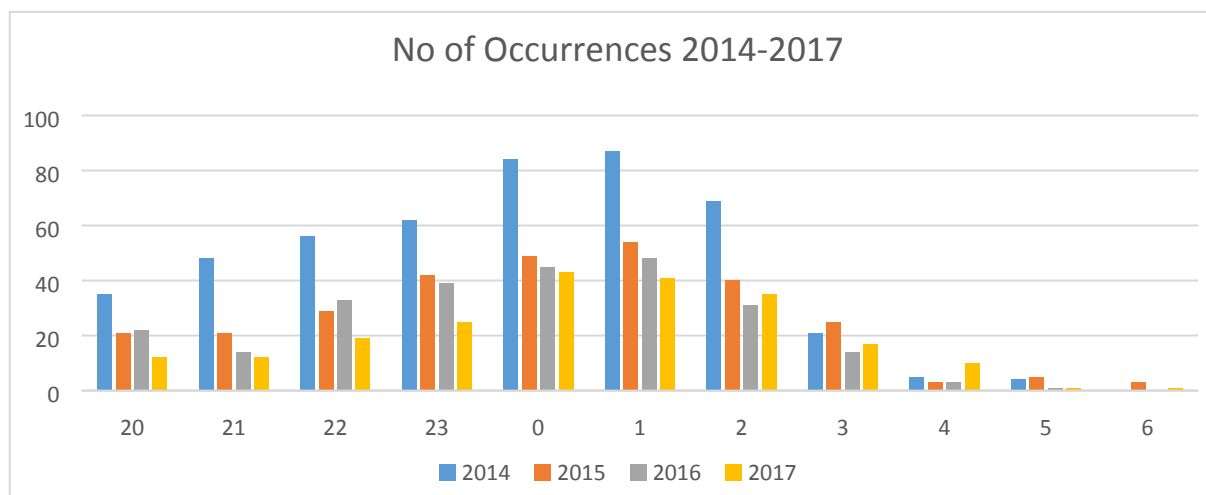


Wind Street and Surrounding Areas – Anti Social Behaviour (ASB) (2014-2017)

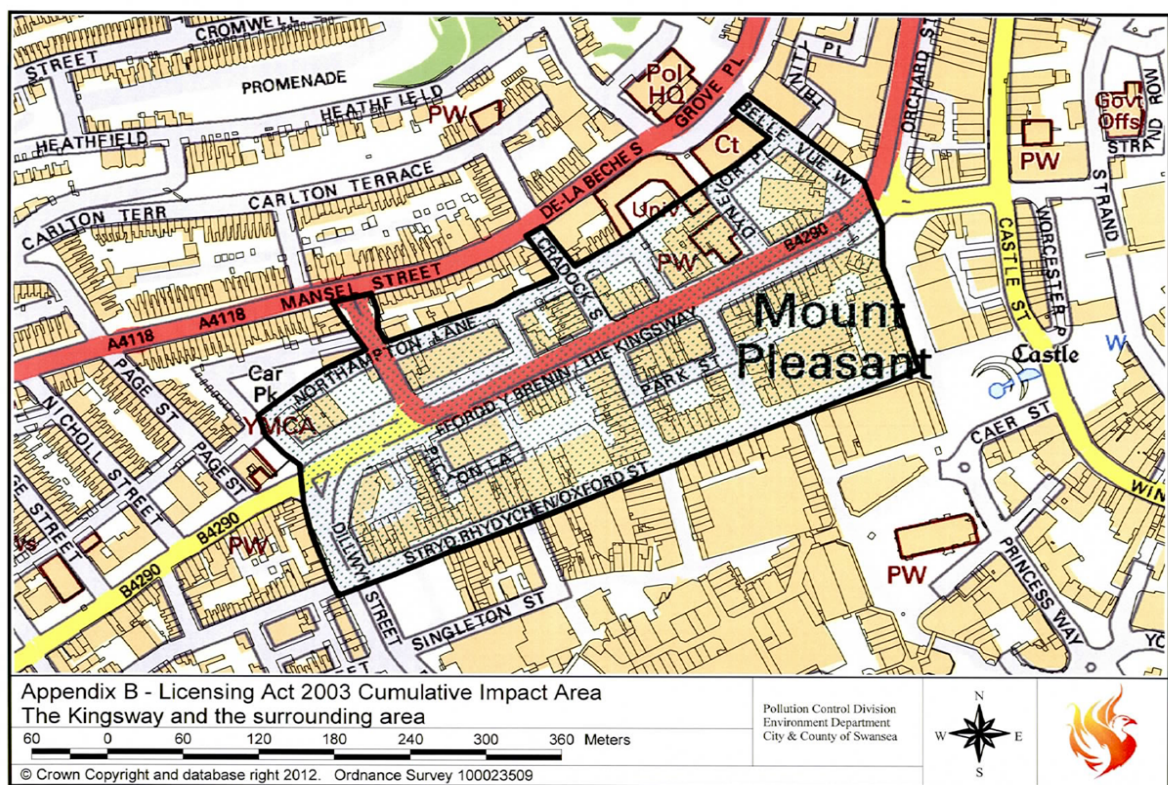
Hours of Day (8pm to 7am)

	20	21	22	23	0	1	2	3	4	5	6	Total
2014	35	48	56	62	84	87	69	69	5	4	0	471
2015	21	21	29	42	49	54	40	40	3	5	3	292
2016	22	14	33	39	45	48	31	31	3	1	0	250
2017	12	12	19	25	43	41	35	35	10	1	1	216
Total	90	95	137	168	221	230	175	175	21	11	4	1229

In relation to anti-social behaviour, the red blocks again reaffirm that the busiest period for anti social behaviour is between 11pm and 3am. The figures show a total decrease of 14% for ASB between 8pm and 7am between 2016 and 2017.



The Kingsway and the surrounding area



Over the past 10 years, the Kingsway has seen a gradual decline in its popularity for businesses, and this has included a significant reduction in the number of licensed premises. Large venues such as Oceana, Jumpin Jacks, and Escape have closed, and with some of these premises being completely demolished to make way for the regeneration which is take place under the council's development proposals. These closures have resulted in a 9% reduction in recorded crime level between April 2015 and March 2018. It has also shown a 23% reduction in anti-social behaviour but has shown a 6% increase in violent crime during the same period.

The Kingsway night time economy is dominated by two licensed premises on Northampton Lane. These venues which hold sale of alcohol hours until 4am and 5am respectively, help shift the peak period for crimes later in to the night. Recent multi agency visits have illustrated that this is still an area for cause for concern with a number of violent disturbances witnessed in the surrounding streets of the Kingsway from 2am onwards.

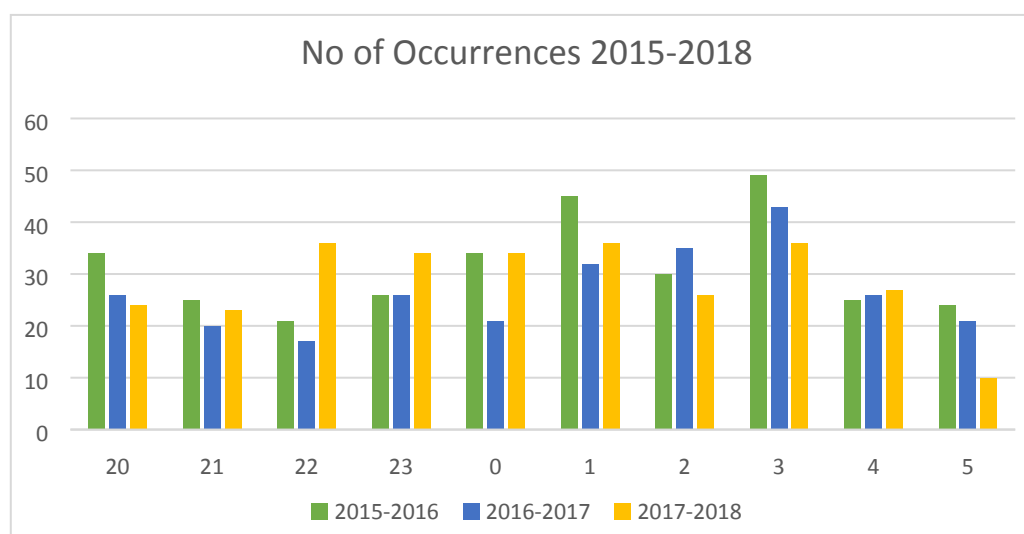
It is anticipated that during the redevelopment process there will be an increase in the number of licence applications received. Based on this expected increase, and on the evidence witnessed during the multi-agency visits, South Wales Police feel that the cumulative impact policy should remain in place for the Kingsway and surrounding area until all development has been completed where an overview of the whole area can be undertaken and reevaluate

The Kingsway and the surrounding area - All recorded crime (2015-2018)

Hours of day 8pm -6am

	20	21	22	23	0	1	2	3	4	5	Total
2015-2016	34	25	21	26	34	45	30	49	25	24	313
2016-2017	26	20	17	26	21	32	35	43	26	21	267
2017-2018	24	23	36	34	34	36	26	36	27	10	286
Total	84	68	74	86	89	113	91	128	78	55	866

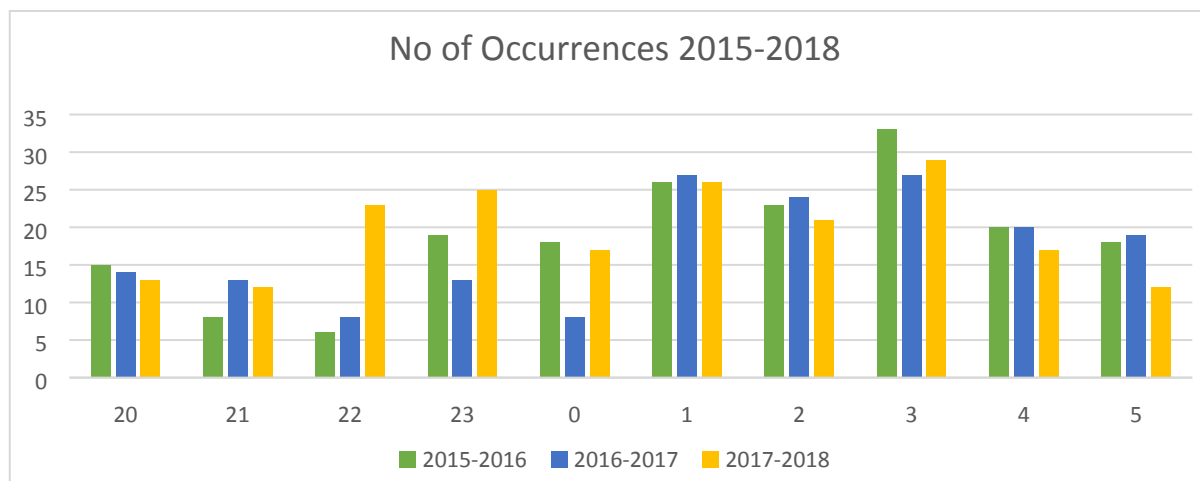
The red blocks illustrate that the busiest period for all recorded crime is between midnight and 4am. The figures show a 9% reduction in recorded crime between 8pm and 6am between 2015 and 2018.



The Kingsway and the surrounding area - All violent crime (violence with injury, violence without injury and public order 2015-2018)

Hours of day 8pm -6am											
	20	21	22	23	0	1	2	3	4	5	Total
2015-2016	12	7	3	14	13	18	18	28	17	13	143
2016-2017	8	10	4	11	6	20	16	20	16	15	126
2017-2018	9	11	18	18	12	19	16	23	16	10	152
Total	29	28	25	43	31	57	50	71	49	38	421

The red blocks illustrate that the busiest period for all violent crime is between 1am and 4am. The figures show a 6% increase in recorded crime between 8pm and 6am between 2015 and 2018.

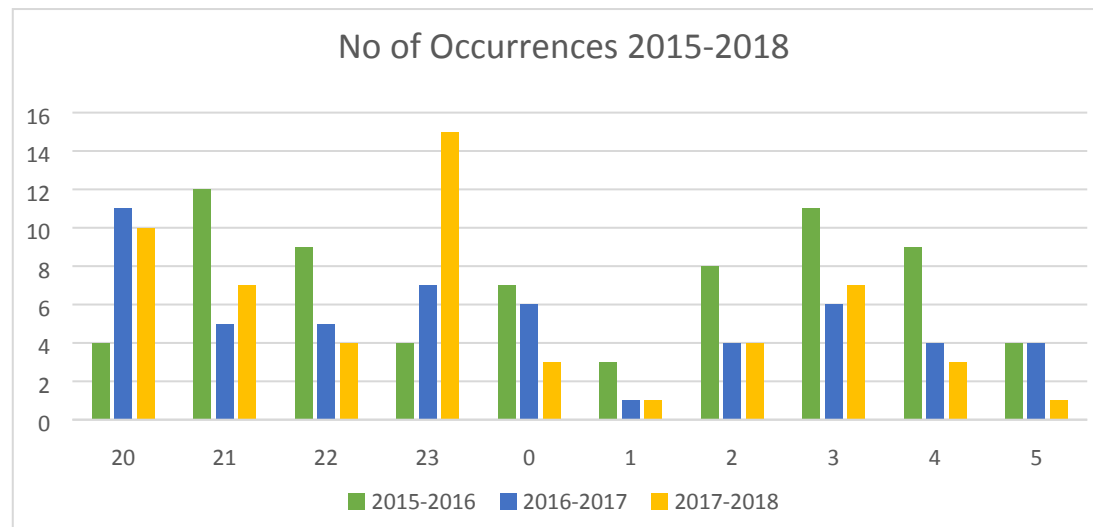


The Kingsway and the surrounding area – Anti Social Behaviour (ASB) (2015-2018)

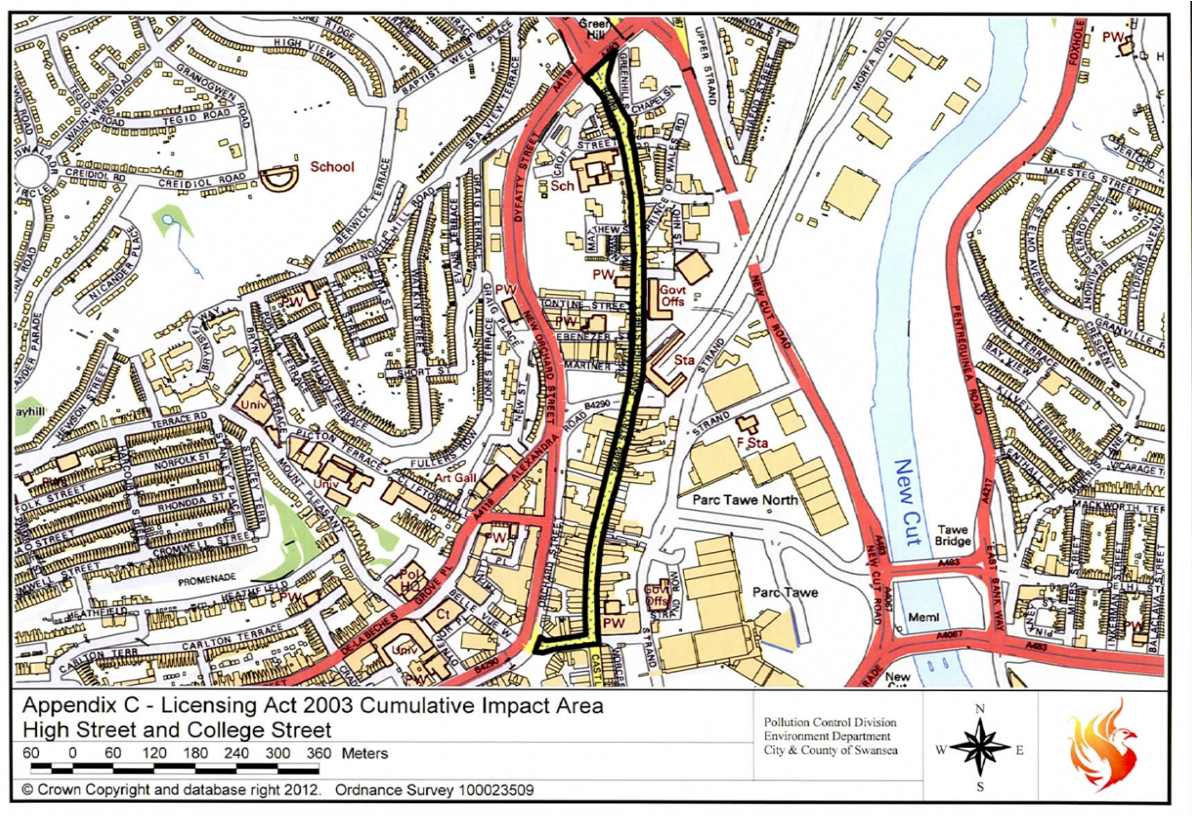
Hours of day 8pm -6am

	20	21	22	23	0	1	2	3	4	5	Total
2015-2016	4	12	9	4	7	3	8	11	9	4	71
2016-2017	11	5	5	7	6	1	4	6	4	4	53
2017-2018	10	7	4	15	3	1	4	7	3	1	55
Total	25	24	18	26	16	5	16	24	16	9	179

The red blocks illustrate that there are a number of peak times for ASB between 8pm and 5am. Evidence would suggest that this can be linked to the Kingsway being a walk through to the busier night time economy of Wind Street, but it also does show that between 2am and 5am incidents do peak during the later hours. The figures do show a 23% total reduction in ASB between 8pm and 6am between 2015 and 2018.



High Street and College Street



In the past 5 years, High Street and College Street has seen a dramatic change in the types of licensed premises contained within it. Coastal housing have invested heavily in the area, promoting a community feel to it's residential and commercial premises. Many of the traditional wet led, vertical drinking licensed premises (bars and nightclubs) have now been replaced by new buildings, promoting cultural and community projects and businesses. These new premises have demonstrated their ability to comply with the cumulative impact policy with regards to the exemptions and therefore they have been licensed in accordance within those guidelines.

The regeneration of the area has had a positive impact on the crime and disorder statistics for the area. The move away from the late night hours and vertical drinking has meant that there has been a 22% reduction in reported crime and a 31% reduction in violent crime between April 2015 and March 2018.

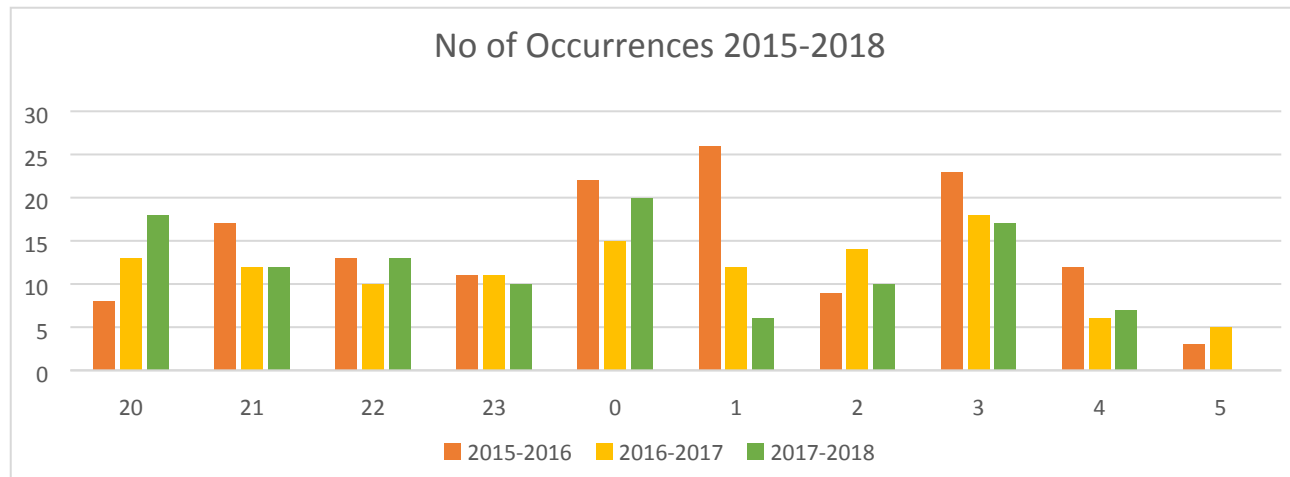
The regeneration of High Street and College Street is set to continue with two large student accommodation blocks under development. This will vastly increase the residential capacity of the area which will lead to an anticipated increase in the number of licensed premises applications received. The recent success of the cumulative impact policy in promoting and attracting new and diverse venues and projects, demonstrates how the policy should be reapplied to the area to continue to build on the community atmosphere that has been developed using the CIP framework and exemptions.

High Street and College Street - All recorded crime (2015-2018)

Hours of day 8pm -6am

	20	21	22	23	0	1	2	3	4	5	Total
2015-2016	8	17	13	11	22	26	9	23	12	3	144
2016-2017	13	12	10	11	15	12	14	18	6	5	116
2017-2018	18	12	13	10	20	6	10	17	7	0	113
Total	39	41	36	32	57	44	33	58	25	8	373

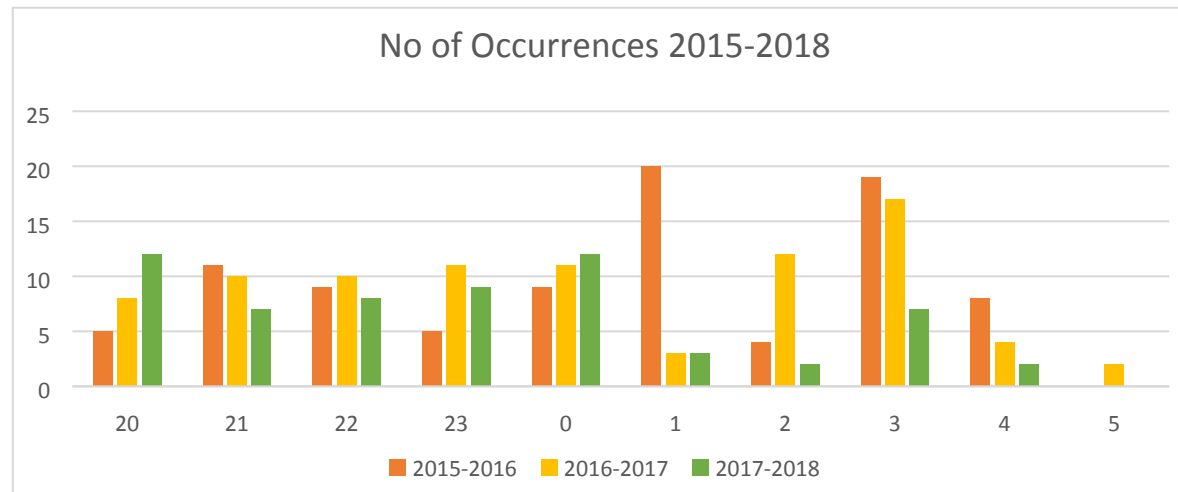
The red blocks illustrate that the busiest period for all recorded crime is between midnight and 4am. The figures show a 22% reduction in recorded crime between 8pm and 6am between 2015 and 2018.



High Street and College Street - All violent crime (violence with injury, violence without injury and public order 2015-2018)

Hours of day 8pm -6am											
	20	21	22	23	0	1	2	3	4	5	Total
2015-2016	5	11	9	5	9	20	4	19	8	0	90
2016-2017	8	10	10	11	11	3	12	17	4	2	88
2017-2018	12	7	8	9	12	3	2	7	2	0	62
Total	25	28	27	25	32	26	18	43	14	2	240

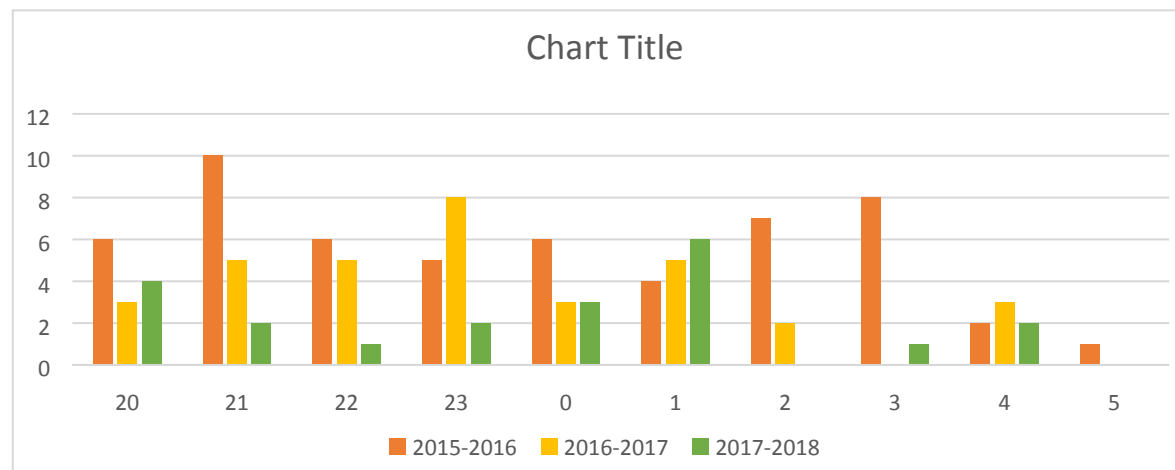
The red blocks illustrate that the busiest period for all violent crime is spread 9pm and 4am. The figures show a 31% reduction in recorded crime between 8pm and 6am between 2015 and 2018.



High Street and College Street – Anti Social Behaviour (ASB) (2015-2018)

Hours of day 8pm -6am											
	20	21	22	23	0	1	2	3	4	5	Total
2015-2016	6	10	6	5	6	4	7	8	2	1	55
2016-2017	3	5	5	8	3	5	2	0	3	0	34
2017-2018	4	2	1	2	3	6	0	1	2	0	21
Total	13	17	12	15	12	15	9	9	7	1	110

The red blocks illustrate that the busiest period for all ASB is spread between 8pm and 2am. The figures show a 62% reduction in ASB between 8pm and 6am between 2015 and 2018.



All of the police data shows that despite a substantial police commitment to the evening and night time economy, figures show that all levels of crime, including violent crime have increased significantly last year. Any relaxation of the cumulative impact policy in relation to late night venues will lead to an expected increase to the number of operating licensed premises and this will have the potential to increase these figures still further.

South Wales Police have identified that there are issues surrounding pre loading and a later walk up of persons in to the night time economy which is supported by the police figures showing a year on year increase after 3am in all crime and violent crime occurrences. To move away from the current cumulative impact policy will assist in reinforcing this later drinking culture. There is currently overwhelming capacity within the evening and night time economy to encourage a more family environment and encourage people to enjoy themselves earlier, and this has been reflected in South Wales Police approach in conjunction with partner agencies to encourage new and diverse premises focusing on family entertainment, cultural and community projects and food led operations.

The existence of the cumulative impact policy in its current form has assisted in the control of the number of licensed premises within the night time economy. In order to police the Evening and Night Time Economy, South Wales Police utilise a specific policing operation within the Cumulative Impact zones called 'Swansea After Dark' which is implemented every Wednesday, Friday, Saturday, and identified busy event days. The operation consists of officers who are abstracted from their primary roles from response and neighbourhood sectors across both Swansea and Neath Port Talbot, along with specialist officers who are abstracted from key criminal investigation and public protection roles. Due to the volume of licensed premises, there is a need to utilise a meet and greet approach, providing early intervention to identify crime and disorder, and vulnerability at an early stage. As a result, there is a requirement to extend the provision of officers within the Wind Street and surrounding area from 1800hrs. When this is combined with the requirement to provide officers during peak demand until 0600hrs, South Wales Police face significant resource issues to provide sufficient officers to work between those hours, whilst also ensuring sufficient numbers to ensure the safety of officers and members of the public to manage in excess of 20,000 people within the night time economy. This has a substantial impact on the policing of communities in Swansea and Neath/Port Talbot, and has a significant financial cost to the force to resource annually. Whilst there is a substantial emphasis placed on the night time economy within the cumulative impact zones, there is still the daily demand pressures of policing the City Centre whilst also providing presence and reassurance to other night time economy areas and communities, such as Uplands, the Marina, SA1 and Mumbles.

Should the cumulative impact policy be amended or relaxed, there will certainly be an expected increase in the number of late night drinking venues likely to enter the night time economy do the same. When considering any later operating hours, 7 days a week, then there will be an almost certain requirement to extend the after dark operation further in order to prevent crime and disorder and ASB, and to ensure public safety. This will have significant repercussions on resource and budget levels across the division, and is unsustainable in the current financial climate where tough operational policing decisions and cut backs are being undertaken.

Swansea has recently been successful in achieving a Purple Flag renewal which promotes a vibrant, diverse and safe evening and night time economy. This was achieved through excellent work with partner agencies in conjunction with licensed premises. The Swansea Help point was identified as a fundamental element of the ENTE and was created to help reduce night time economy admissions to local accident and emergency departments, target vulnerability and has treated over 3800 patients in just over 3 years of operating. The Help point is located within the Strand, and consists of a qualified nurse, paramedics, St John Ambulance volunteers, Street Pastors, South Wales Police officers and student volunteers. The Help Point which operates between 10pm and 5am is funded through the Police and Crime Commissioner, and the local Health board, and is in place to offer a safe and substantial medical facility to treat people visiting the ENTE. The Help point costs approximately £1000 a night to operate and opens on a Wednesday, Saturday and identified event days. It is expected that a further increase in people within the late night time economy, will lead to a requirement for the help point to open on additional night and for additional hours, thus having further cost and resource implications for all agencies concerned.

This report is respectfully submitted for your information and consideration,

Yours sincerely,



Police Licensing Officer
(On behalf of the Chief Officer of Police)