

Appendix B

I have been asked to provide a response to a formal request by City & County of Swansea to provide observations in relation to the Council's proposed Cumulative Impact Area policy.

A cumulative impact assessment may be published by a licensing authority to help it to limit the number or types of licence applications granted in areas where there is evidence to show that the number or density of licensed premises in the area is having a cumulative impact and leading to problems which are undermining the licensing objectives. CIAs relate to applications for new premises licences and club premises certificates and applications to vary existing premises licences and club premises certificates in a specific area.

Previous CIA cycles have been 2013/17 & 2018/21 however due to the significant disruption caused by the Covid19 pandemic the CIA due in 2021 has not yet been formulated and is expected to be adopted before July 2023.

Previous CIAs to date have been adopted under the local authority's licensing policy however, since then a change to the Licensing Act 2003 was made by the Policing & Crime Act 2017 (with effect from 6th April 2018) which puts the CIA process on a statutory footing. Statutory guidance has been published and this report has been drafted in accordance with that guidance.

As well as providing data relating to police demand I will also provide an interpretation of the data together with conclusions.

The police response for the previous CIA (dated 04/04/2018) looked at crime and disorder data for the following areas during Evening and Night-time Economy hours:

Wind St & surrounding area
The Kingsway & surrounding area
High St & College St

The figures revealed a number of issues including the following:

Wind St – an increase in recorded crime of 78% between 2016 and 2017
Kingsway – 9% reduction in recorded crime between 2015 and 2018
High St – 22% reduction in recorded crime between 2015 and 2018

Part of the increase in Wind St can be attributed to a change in how crime was recorded by SWP during that time, however the corresponding reduction at Kingsway & High St indicates the growing popularity of Wind St as an ENTE destination at the expense of other areas of the city.

Other notable findings from the previous report indicate that the peak time for all recorded crime (including violence with & without injury, public order & drunk and disorderly offences) in the three areas listed above was between 11pm & 3am.

In addition, a year on year increase in recorded crime levels was noted from 3am onwards which indicated the consequences of late night walk-up into the night-time economy.

The report concluded that any relaxation to the CIA would lead to an increase in the number of late-night drinking venues which would in turn result in greater levels of late night crime and disorder which would place increased pressures on policing not only in the City but throughout the Division. For this reason SWP Swansea Neath Port Talbot Division endorsed the policy and opposed any relaxation to it.

The current situation

The ENTE has bounced back from closure and restrictions brought about by the Covid 19 Pandemic during 2020/21 and is now once again operating at normal capacity. Since the last report there has been a number of changes to the city centre, Wind St and surrounding areas which could be said to have an impact on the ENTE, examples being:

- The increased popularity of Swansea as a university City with in-excess of 30,000 students between the two main universities (Swansea University & UWTSD), many of which reside in the city and socialise within the ENTE.
- Construction of six purpose-built student accommodations (PBSA) within the city centre which have a combined population of approx. 4,000 students. A further PBSA is currently under construction which is due to open for the 2023/24 academic year.
- Wind St has now become a pedestrian zone with the installation of numerous items of street furniture throughout the length of the street.
- Increase use of outdoor pavement café areas outside licensed premises, partly in response to Covid restrictions, however many have become permanent.
- Opening of the Arena concert venue in February 2022 which hosts events such as music concerts, shows and conventions and has a maximum capacity of 3,500.
- On-going development of the St David's area located between Wind St and the Arena which will contain several new licensed premises when complete.

In addition to the above there continues to be ENTE premises located at the Kingsway and also High St/College St, although the main focus of ENTE activity within the city continues to be at Wind St and surrounding area. The Kingsway is currently undergoing redevelopment into a commercial/business zone as well as residential premises, therefore it is anticipated that ENTE activity will decrease in this area. I will examine this in more detail later in the report.

Also, the past few years has seen the emergence and increased popularity of further ENTE spots outside of the city centre, these being:

Uplands

SA1

Mumbles

Current police response

Swansea Neath Port Talbot Division has a long history of policing the evening and night-time economy within the cumulative impact zone, which is done via the long-running operation, 'Swansea After-Dark'. This is implemented on the busiest days of the week for the ENTE, Wednesdays (student night), Fridays & Saturdays. In addition to this After-Dark deployments also take place on other key dates for the ENTE such as bank holiday weekends, A Level result night, Beaujolais Day, Halloween etc.

After-Dark patrols typically involve a team of 1 x sergeant and approx. 12 PCs (Wed & Sat) predominantly working between the hours of 6pm to 4 am, although some shifts are staggered to provide coverage later into the night. These officers are not dedicated solely to After Dark but are abstracted from their primary roles such as Response & Neighbourhood Policing as well as criminal investigation and public protection roles throughout the Division. Patrols are carried out on foot around Wind St and its environs and due to the volume of licensed premises and patrons there is a need for a 'meet and greet' approach where officers are encouraged to interact with the public, providing early intervention to identify and tackle crime & disorder and also vulnerability at the earliest opportunity.

Given the emergence of other pockets of ENTE such as SA1 & Uplands After-Dark officers also deploy to these areas thus reducing the number of officers patrolling Wind St. In addition, After-Dark officers are periodically required to assist in other areas of the Division in the event of exceptional demand.

Such are the demands of the role, After-Dark officers will inevitably become involved in arrests, interventions and enquiries throughout the evening which may well result in them being committed for the rest of the evening and subsequently not deployable for further patrols. Therefore, the team of 12 officers will become eroded as the evening progresses and there will be far fewer officers available later in the shift, which is a peak time given the staggered closing times for licensed premises typically between midnight and 4am. During this time a large number of persons, many intoxicated have egressed the many licensed premises and will be congregating in numbers at various fast-food establishments and taxi ranks prior to making their way home. This is a crucial period during the evening when the maximum number of officers are required to prevent crime & disorder, prevent harm and to promote public safety, however the fewest number are actually available, visible and deployable. Having supervised After Dark teams for many years I can attest to this attrition of resources, which is the norm.

Help Point

A further measure adopted by SWP in an effort to tackle vulnerability within the ENTE and to help break demand on After-Dark officers is the Help Point. This is a collaborative venture involving SWP and a number of key partners and is funded by the Police & Crime Commissioner, Welsh Ambulance Service & local health board.

The premises is located at the Strand Car park and is staffed by St Johns Ambulance (SJA) staff & volunteers, student volunteers (PSV) and a police officer. The Help Point is open from 10pm to 4am on Wednesdays & Saturdays and also key dates such as bank holiday weekends etc. An initial pilot scheme to trial Friday night opening has recently been carried out and further work on this is currently on-going.

Since its inception eight years ago the Help Point has treated in excess of 6,000 patients for conditions ranging from intoxication, injury and medical issues.

Access into the Help Point for those who need it is via three main routes:

- Patient brought in by police
- Pro-active patrols by student volunteers who identify vulnerable patient
- Direct contact from venues to SJA control via Nite-net radio with student volunteers then deployed to collect the patient.

Running costs are approximately £1,000 per night. There are only three paid staff (nurse, paramedic & police officer), the bulk of the personnel being SJA volunteers & student volunteers.

Patient numbers over the past year indicate that on average 12 patients will be treated at the Help Point on a Saturday evening and 10-12 on Wednesdays, however this figure drops outside of term-time when less students are active within the ENTE.

The Help Point is considered to be an excellent example of best practice & partnership working within the ENTE which has a real impact in tackling vulnerability and breaking demand for officers, freeing them up to deal with other issues.

Other agencies

Staff and volunteers from other agencies also operate within the city centre ENTE to promote public safety including:

- Taxi Marshals
- City Centre Rangers
- Street pastor scheme (volunteers from various faith groups who patrol Wind St and provide assistance to those who need it).

Statistics

The following statistics contain an overview of total occurrences during the evening & night-time economy period (1800-0600 hrs) over a five-year period (2017-22) for the three cumulative impact areas:

Wind St and surrounding area: Wind Street, The Strand (to the junction with Welcome Lane), Worcester Place, Castle Street, Castle Gardens, Castle Square, Temple Street, Green Dragon Lane, Little Wind Street, Salubrious Place, Salubrious Passage, Caer Street, Princess Way, St Mary's Street, St Mary's Square, St David's Place, York Street, Victoria Road

The Kingsway and surrounding area: The Kingsway, Dillwyn Street (from the junctions with The Kingsway and Oxford Street), Oxford Street (from the junctions with Dillwyn Street and Princess Way), Picton Lane, Union Street (from the junctions of The Kingsway and Oxford Street), Park Street, Portland Street, Bellvue Way, Dynevor Place, Horton Street, Pell Street, Cradock Street, Northampton Lane, Christina Street, Newton Street

High St and surrounding area: High Street, College St

We will examine each of these area in more detail and look at hourly breakdown for all crimes, violence and anti-social behaviour, to give an indication of the demand facing SWP officers, however an overview is as follows:

Total Occurrences during ENTE period (1800 hrs – 0600 hrs)

	<u>Wind St</u>	(% change)	<u>Kingsway</u>	(% change)	<u>High St</u>	(%change)
2017/18	1899		919		370	
2018/19	1719	(-9.5%)	688	(-25%)	524	(+141%)
2019/20	1350	(-21.5%)	604	(-12%)	433	(-17%)
2020/21	469	(-287%)	318	(-189%)	414	(-4%)
2021/22	1308	(+278%)	504	(+158%)	320	(-23%)

Wind St – 31% decrease in occurrences over five-year period 2017-22

Kingsway – 45% decrease in occurrences over five-year period 2017-22

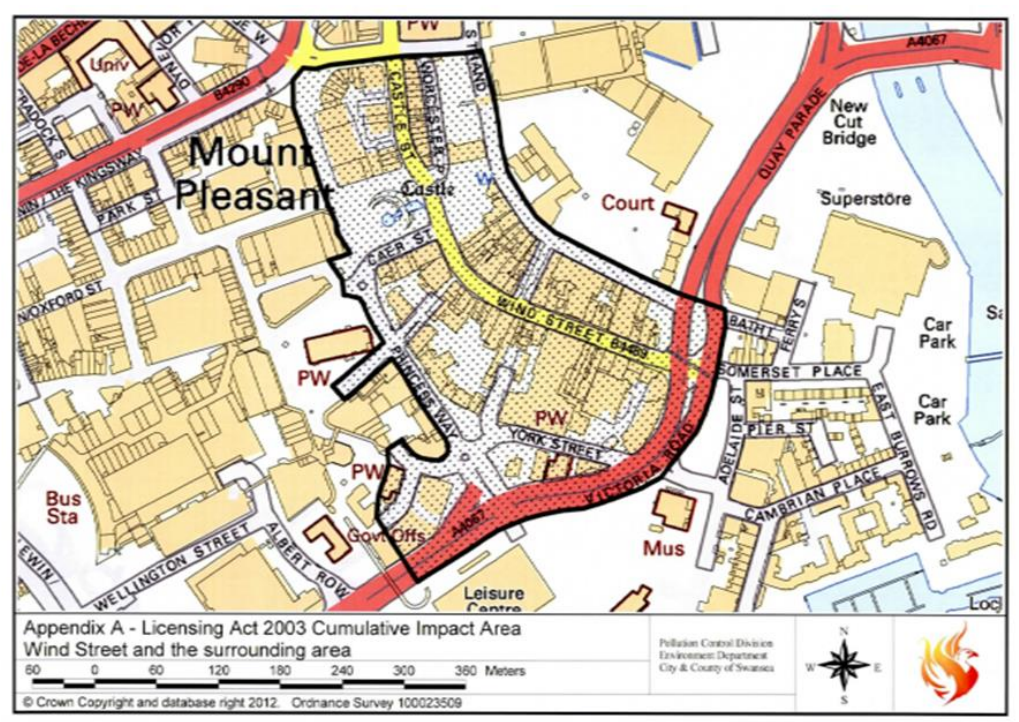
High St – 13% decrease in occurrences over five-year period 2017-22

- % change represents the year on year difference

The figures highlighted in red represent the period most affected by restrictions and closure to ENTE due to the Covid 19 pandemic. It can be seen that Wind St and the Kingsway experienced a significant drop in demand however there is no discernible difference for High St during this period, although it should be noted that the number of occurrences for High St is considerably less than the other areas.

The figures for 2021/22 also indicate that demand has largely returned to pre-pandemic levels.

Wind St

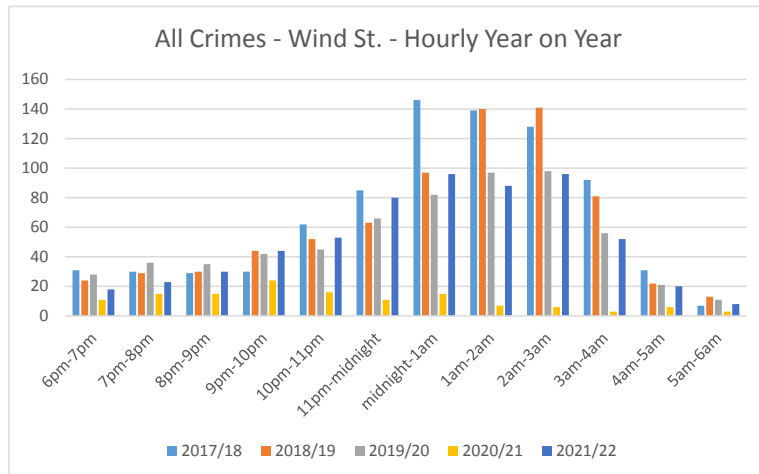


All Crimes Wind St

	2017/18	2018/19	2019/20	2020/21	2021/22
6pm-7pm	31	24	28	11	18
7pm-8pm	30	29	36	15	23
8pm-9pm	29	30	35	15	30
9pm-10pm	30	44	42	24	44
10pm-11pm	62	52	45	16	53
11pm-0000	85	63	66	11	80
0000-1am	146	97	82	15	96
1am-2am	139	140	97	7	88
2am-3am	128	141	98	6	96
3am-4am	92	81	56	3	52
4am-5am	31	22	21	6	20
5am-6am	7	13	11	3	8
TOTAL	810	736	617	132	608

The above data shows that there has been a 25% reduction in crime within the Wind St CIA between 2017-22. Also of note is the huge reduction in crime during the main period of Covid restrictions & closures during 2020/21.

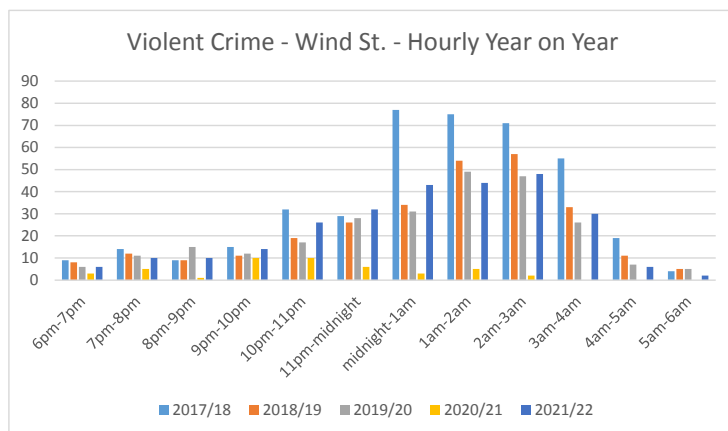
It also shows that the peak time for demand is between 10pm-4am (highlighted in red). This is illustrate below:



Violent Crime - Wind St

	2017/18	2018/19	2019/20	2020/21	2021/22
6pm-7pm	9	8	6	3	6
7pm-8pm	14	12	11	5	10
8pm-9pm	9	9	15	1	10
9pm-10pm	15	11	12	10	14
10pm-11pm	32	19	17	10	26
11pm-0000	29	26	28	6	32
0000-1am	77	34	31	3	43
1am-2am	75	54	49	5	44
2am-3am	71	57	47	2	48
3am-4am	55	33	26	0	30
4am-5am	19	11	7	0	6
5am-6am	4	5	5	0	2
TOTAL	409	279	254	45	271

The above represents a 33% reduction in violent crime between 2017-22. Also replicated is the large decrease during the main Covid period 2020/21. In addition, the pattern of peak demand between 10pm-4am is repeated:

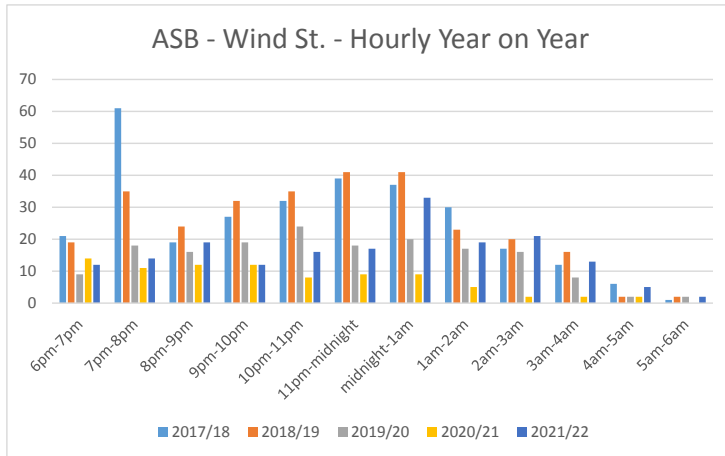


Anti-Social Behaviour - Wind St

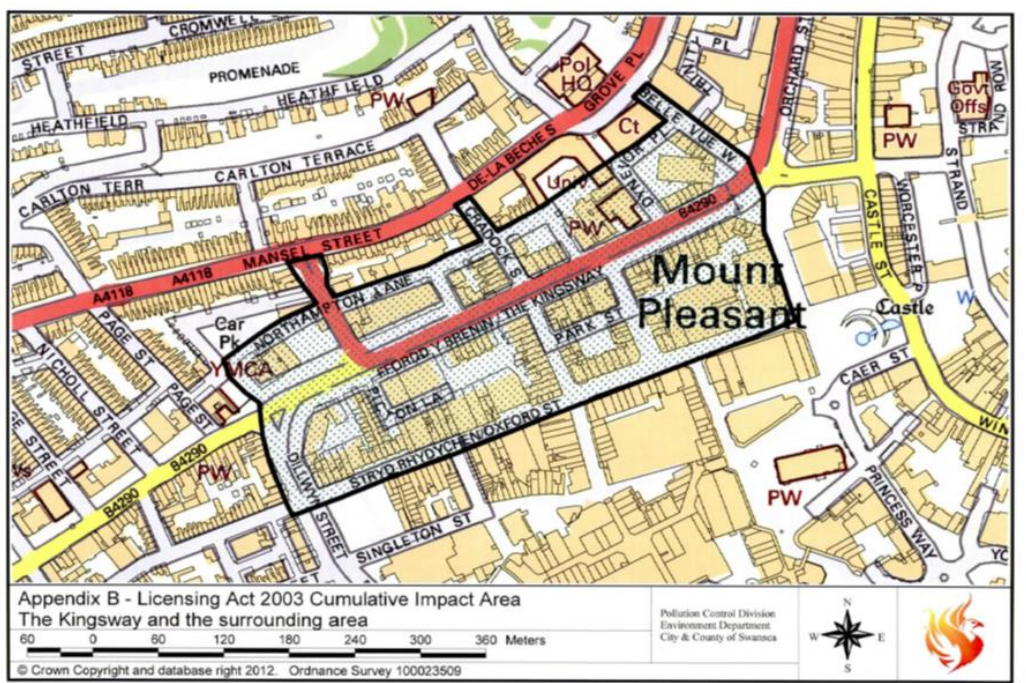
	2017/18	2018/19	2019/20	2020/21	2021/22
6pm-7pm	21	19	9	14	12
7pm-8pm	61	35	18	11	14
8pm-9pm	19	24	16	12	19
9pm-10pm	27	32	19	12	12
10pm-11pm	32	35	24	8	16
11pm-0000	39	41	18	9	17
0000-1am	37	41	20	9	33
1am-2am	30	23	17	5	19
2am-3am	17	20	16	2	21
3am-4am	12	16	8	2	13
4am-5am	6	2	2	2	5
5am-6am	1	2	2	0	2
TOTAL	302	290	169	86	183

The above represents a 39% reduction in anti-social behaviour between 2017-22. Again, the effects of Covid restrictions and closure can be seen in 2020/21.

In addition, peak demand is also between 10pm-4am although this is not as clearly pronounced as the previous figures:



The Kingsway



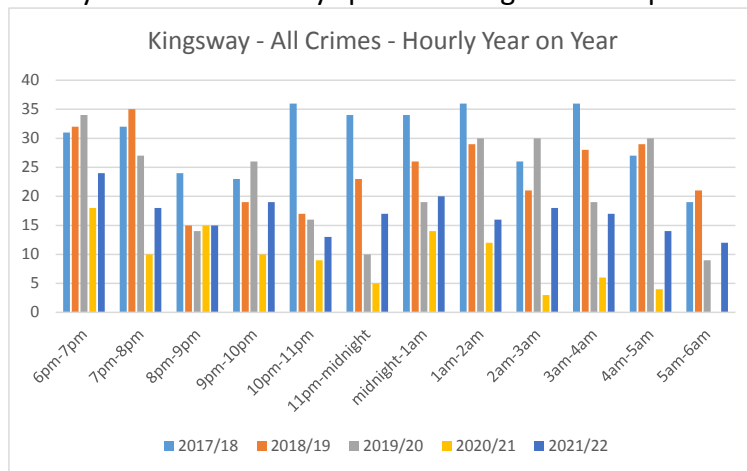
All Crimes - Kingsway

	2017/18	2018/19	2019/20	2020/21	2021/22
6pm-7pm	31	32	34	18	24
7pm-8pm	32	35	27	10	18
8pm-9pm	24	15	14	15	15
9pm-10pm	23	19	26	10	19
10pm-11pm	36	17	16	9	13
11pm-0000	34	23	10	5	17
0000-1am	34	26	19	14	20

1am-2am	36	29	30	12	16
2am-3am	26	21	30	3	18
3am-4am	36	28	19	6	17
4am-5am	27	29	30	4	14
5am-6am	19	21	9	0	12
TOTAL	358	295	264	106	203

The above shows a 43% reduction in all crime within the Kingsway CIA between 2017/22.

Again, a large drop in crime is evident during the Covid period 2020/21. Hourly demand is evenly spread during the ENTE period as shown below:

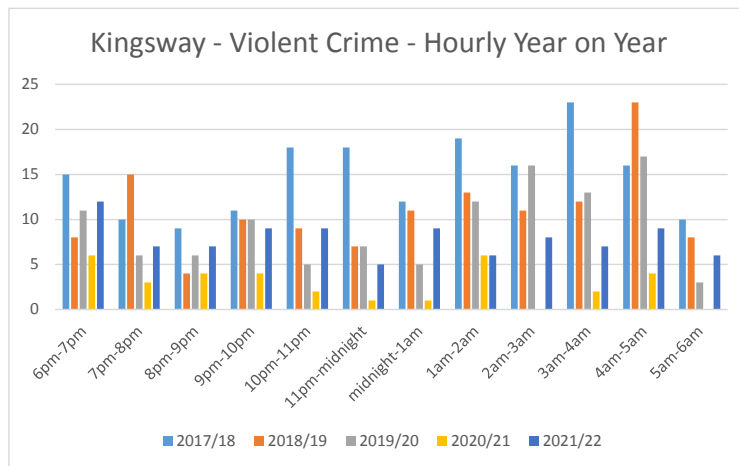


Violent Crime - Kingsway

	2017/18	2018/19	2019/20	2020/21	2021/22
6pm-7pm	15	8	11	6	12
7pm-8pm	10	15	6	3	7
8pm-9pm	9	4	6	4	7
9pm-10pm	11	10	10	4	9
10pm-11pm	18	9	5	2	9
11pm-0000	18	7	7	1	5
0000-1am	12	11	5	1	9
1am-2am	19	13	12	6	6
2am-3am	16	11	16	0	8
3am-4am	23	12	13	2	7
4am-5am	16	23	17	4	9
5am-6am	10	8	3	0	6
TOTAL	177	131	111	33	94

The above shows a 45% reduction in violent crime over the five-year period 2017-22.

Again, a large drop can be seen in the figures for 2022/21, and hourly demand is evenly split, with a slight increase later in the night:



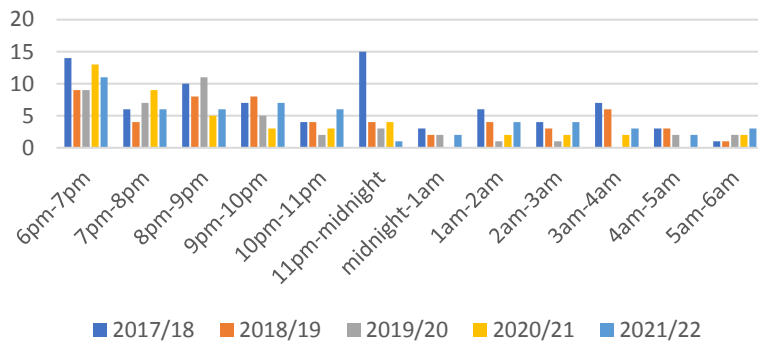
Anti-Social Behaviour - Kingsway

	2017/18	2018/19	2019/20	2020/21	2021/22
6pm-7pm	14	9	9	13	11
7pm-8pm	6	4	7	9	6
8pm-9pm	10	8	11	5	6
9pm-10pm	7	8	5	3	7
10pm-11pm	4	4	2	3	6
11pm-0000	15	4	3	4	1
0000-1am	3	2	2	0	2
1am-2am	6	4	1	2	4
2am-3am	4	3	1	2	4
3am-4am	7	6	0	2	3
4am-5am	3	3	2	0	2
5am-6am	1	1	2	2	3
TOTAL	80	56	45	45	55

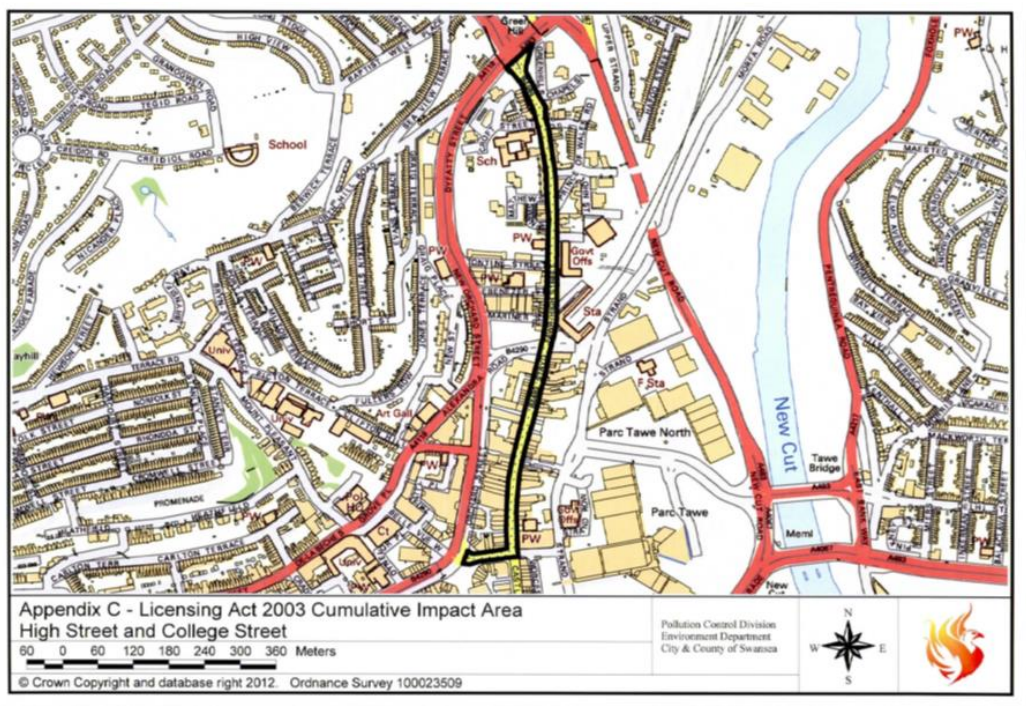
The above represents a 31% reduction in ASB at the Kingsway over the five year period 2017-22.

Again, hourly demand is evenly split:

Kingsway - ASB- Hourly Year on Year



High Street (& College St)



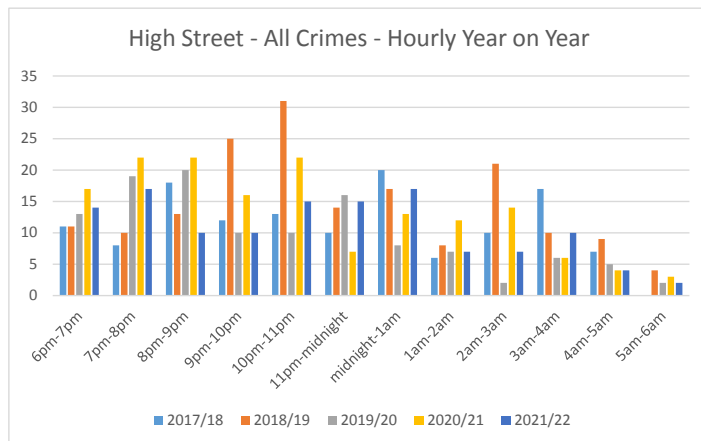
All Crimes-High St

	2017/18	2018/19	2019/20	2020/21	2021/22
6pm-7pm	11	11	13	17	14
7pm-8pm	8	10	19	22	17
8pm-9pm	18	13	20	22	10
9pm-10pm	12	25	10	16	10
10pm-11pm	13	31	10	22	15
11pm-0000	10	14	16	7	15
0000-1am	20	17	8	13	17
1am-2am	6	8	7	12	7
2am-3am	10	21	2	14	7
3am-4am	17	10	6	6	10
4am-5am	7	9	5	4	4
5am-6am	0	4	2	3	2
TOTAL	132	173	118	158	128

The above shows a 3% reduction in crime within the High St CIA between 2017-22.

The previous pattern of lower figure during the main Covid period 2020/21 is not seen here.

Again, as seen at the Kingsway there is a more even spread of hourly demand:

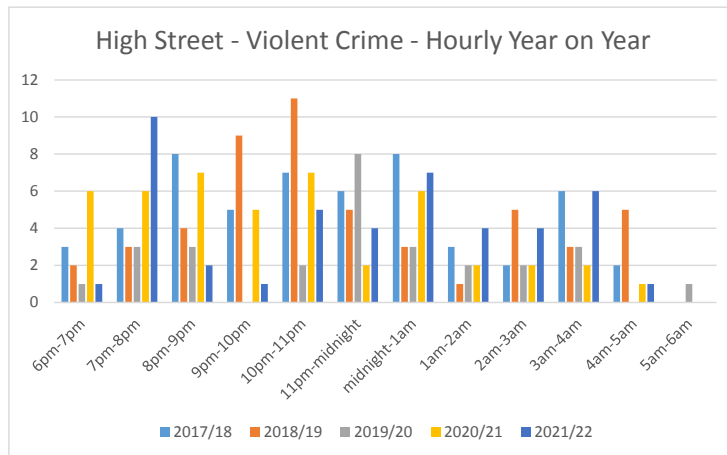


Violent Crime - High St

	2017/18	2018/19	2019/20	2020/21	2021/22
6pm-7pm	3	2	1	6	1
7pm-8pm	4	3	3	6	10
8pm-9pm	8	4	3	7	2
9pm-10pm	5	9	0	5	1
10pm-11pm	7	11	2	7	5
11pm-0000	6	5	8	2	4
0000-1am	8	3	3	6	7
1am-2am	3	1	2	2	4
2am-3am	2	5	2	2	4
3am-4am	6	3	3	2	6
4am-5am	2	5	0	1	1
5am-6am	0	0	1	0	0
TOTAL	54	51	28	46	45

Violent crime has reduced by 17% during the period 2017-22.

Again, an even spread throughout the ENTE period is evident:



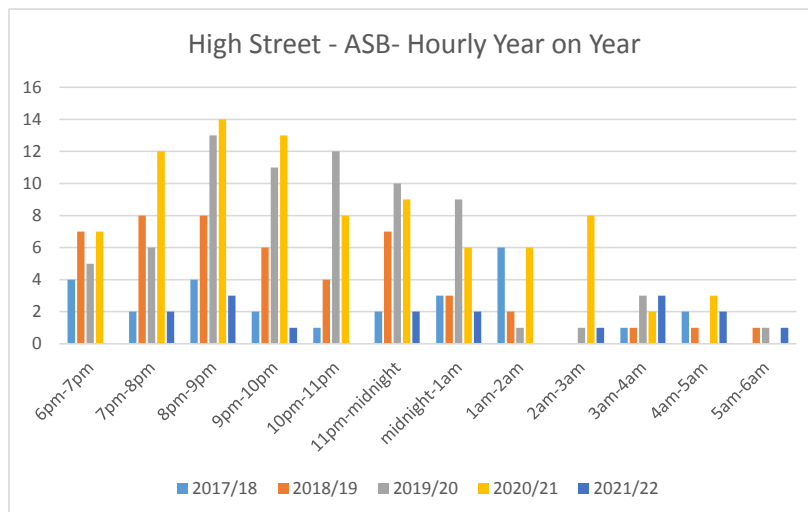
ASB-High St

	2017/18	2018/19	2019/20	2020/21	2021/22
6pm-7pm	4	7	5	7	0

7pm-8pm	2	8	6	12	2
8pm-9pm	4	8	13	14	3
9pm-10pm	2	6	11	13	1
10pm-11pm	1	4	12	8	0
11pm-0000	2	7	10	9	2
0000-1am	3	3	9	6	2
1am-2am	6	2	1	6	0
2am-3am	0	0	1	8	1
3am-4am	1	1	3	2	3
4am-5am	2	1	0	3	2
5am-6am	0	1	1	0	1
TOTAL	27	48	72	88	17

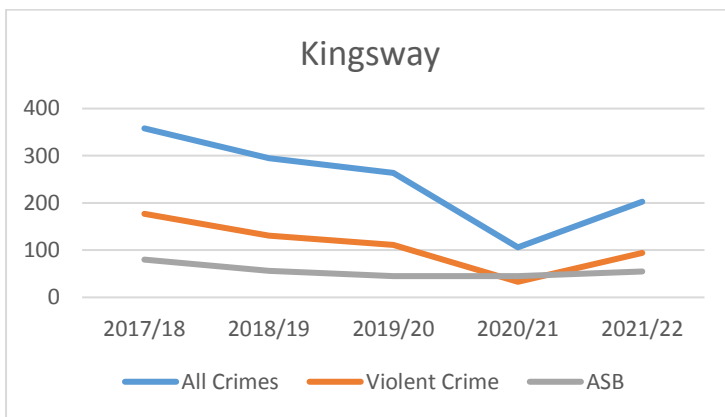
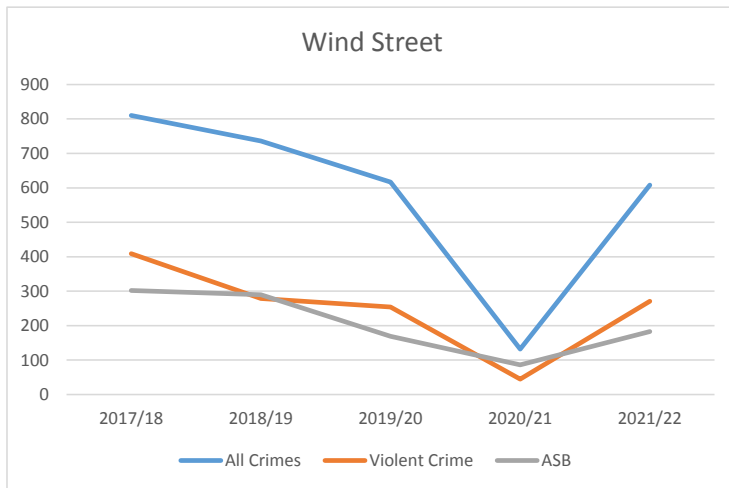
ASB has reduced by 37% over the five-year period, however a considerable spike occurred during 2019/20 & 2020/21 before falling back to much lower levels in 2021/22.

Peak time for ASB is earlier in the evening than we have seen in other areas with 8pm-midnight being the busiest period:

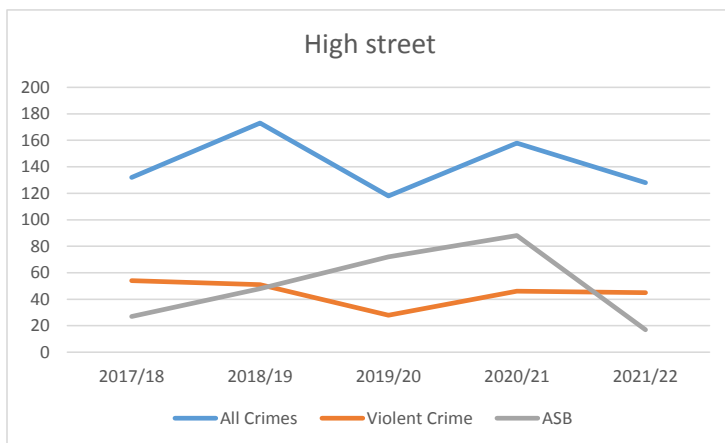


The Covid years 2020/21

We have seen from the figures that the closure of licensed premises and restrictions to their opening hours and operations has impacted crime figures considerably for Wind St & the Kingsway. This is illustrated as follows:



Curiously this phenomenon was not replicated at High St where figures rose from 2019/20 levels:



A possible explanation for this is the fact that the High St area is located close to Swansea central railway Station and has a number of businesses such as convenience stores which are open 24/7 and reflects the transient nature of the area.

Also, it should also be noted that although the bulk of Covid restrictions occurred during 2020/21, there was also a period of closure and restrictions to licensed premises over Xmas 2021 going into Jan 2022, therefore figures for last year do not reflect a full year of normal trading and taking that into account it is likely that figures for next year will be back to pre-Covid levels.

Conclusions

Wind St

Despite a substantial policing commitment the evening and night-time economy continues to generate significant police demand, particularly between 2200-0400 hrs at Wind Street.

The Covid years 2020/21 serve to highlight the dramatic effect of ENTE activity on crime and disorder. **Significantly less ENTE activity equals significantly less police demand.**

The outside pavement café area used by many of the premises on Wind St has created greater pedestrian congestion due to a decrease in space between venues. Coupled with queues for entry to premises at peak times a number of pinch points have become evident. This increases the risk of disorder.

The current ENTE policing model via After Dark is geared towards providing coverage during the peak demand times (up to 0400 hrs).

The supporting infrastructure – Help Point, Taxi Marshals, Street Pastor scheme does not extend beyond 0400 hrs and is unlikely to do so in future.

Any move towards significantly greater saturation of high-volume vertical drinking establishments (HVVD's) within the ENTE (particularly Wind St) would likely lead to increased police demand.

Any move towards later opening of licensed premises within the ENTE would mean an increase in intoxicated persons in the area later into the night, which in turn risks increasing police demand later into the night, beyond 0400 hrs.

Many of the licensed premises located at Wind St regularly submit Temporary Event Notices (TENs) which extend their licensable activities beyond their normal operating hours and later into the night, thus increasing further the number of persons in the ENTE later into the night and the knock-on effect on police demand.

Any change to the previous cumulative impact policy involving later opening would likely mean an increase in applications to extend opening hours later into the night. This increase

in HVVDE's would effectively promote a late-night drinking culture which is at odds with the image of Swansea as a Purple Flag city which boasts a diverse and vibrant ENTE.

Any change to the existing After Dark arrangements to extend police coverage later into the night would have an adverse effect on policing throughout the Swansea Neath Port Talbot Division.

The current regime of staggered closing times between midnight and 0400 hrs allows for a gradual decline in number of persons within the ENTE as they make their way home at varying times and reduces demand at pinch points such as taxi ranks and fast-food establishments and is the favoured approach.

During the previous CIA policy cycle we have observed a decrease in police demand:

Total occurrences down 31% 2017-22

Total crime down 25% 2017-22

Violent crime down 33% 2017-22

ASB down 39% 2017-22

This indicates that the previous CIA policy has been successful and should be re-introduced, particularly in light of the changes taking place within the ENTE in the City and the potential for expansion over the next few years. It also reflects the success of After Dark and the lessons learned over many years of policing the ENTE.

It should also be considered that crime figures do not represent the total picture of police demand, for example the crime prevention effect of early interventions made by officers to prevent minor incidents escalating is not recorded. In addition, an incident may be reported on the night however there may well be following up enquiries required the following day and beyond, which means that ENTE demand further impacts upon day-to-day policing.

The policing environment is continually changing to take into account emerging trends. As well as focussing on public order and violence within the ENTE there is also a need to tackle issues such as vulnerability, violence against women and girls (VAWG), drink spiking, drug misuse etc and these themes will be a focus for After Dark officers going forward.

The Kingsway

Police demand at the Kingsway is approximately 2.5 times less than that of Wind St based on 2021/22 total occurrence figures (504 for Kingsway, 1308 for Wind St).

During the previous CIA policy cycle we have observed a decrease in police demand:

Total occurrences down 45% 2017-22

Total crime down 43% 2017-22

Violent crime down 45% 2017-22

ASB down 31% 2017-22

Again, this indicates that the previous CIA policy was effective. It also reflects the changing nature of the Kingsway with development on-going which will focus more on office and residential premises and less on ENTE premises. Any new cumulative impact policy should take this change into account.

High Street

Police demand at High St is currently four times less than that of Wind St based on total occurrence figures for 2021/22 (320 for High St, 1308 for Wind St).

The area has seen smaller decreases than the other two areas, nevertheless the figures reveal a decrease in police demand:

Total occurrences down 13% 2017-22

Total crimes down 3% 2017-22

Violent crime down 17% 2017-22

ASB down 37% 2017-22

Again, this suggests that the previous CIA policy has been a success in this area.

High St continues to have numerous ENTE premises, and since the previous CIA there has been an influx of students residing in new purpose-built student accommodation (PBSAs) there is a potential for more to spring up to service the extra demand created by their presence. Any new CIA policy should take this into account.

Finally, I wish to stress that the Covid years 2020/21 have shown beyond doubt that there is a link between ENTE activity and police demand. A busier ENTE equals higher police demand. The current policing provision for the ENTE is based on the existing ENTE environment. Any expansion of this would have consequences for policing, and these consequences would be felt throughout Swansea Neath Port Talbot Division.

The bottom line is that when venues close their doors and customers leave, responsibility to manage the situation on the streets rests firmly with police, being the lead agency and only agency consistently present late at night, hence a framework to regulate this environment is welcome.

Consideration has been given to submitting data in relation to emerging areas such as Uplands, SA1 & Mumbles, however, as has been demonstrated in this report Wind St continues to be the main area of police demand in the ENTE and is the area where cumulative impact is most felt.

Therefore, taking the above factors into account, SWP Swansea Neath Port Talbot Division wish to put on record that the adoption a new Cumulative Impact Area policy is supported, particularly so in relation to Wind Street, however any move towards a relaxation of the policy involving later opening and/or significantly greater saturation levels of licensed premises within the ENTE is not supported.

Respectfully submitted for your information and consideration.