

Cumulative Impact Assessment – Nottingham City Area

APPLICATION FOR THE IMPOSITION OF A CUMULATIVE IMPACT ASSESSMENT  
COVERING NOTTINGHAM CITY CENTRE.

WITNESS STATEMENT OF INSP PAUL GUMMER \_\_\_\_\_

Background

1. I am a Police Inspector, serving with Nottinghamshire Police, currently stationed at Byron House. I am the Local Area Commander for Nottingham City Centre with responsibility for crime and ASB. Throughout my service I have been involved in policing the City Centre, including Night Time Economy operations.
2. Keeping the City Centre safe and reducing crime and disorder remain key objectives. Violent crime has fallen dramatically in Nottingham for the period of 2020 to 2021 compared to the previous year, reducing by 56%. Nottingham when compared to the UK's core and Nottingham's most similar cities of Birmingham, Bristol, Cardiff, Leeds, Liverpool, Manchester, Newcastle upon Tyne and Sheffield has the fifth highest level of recorded violence per 1000 population as of July 2021 behind Manchester, Birmingham, Liverpool and Leeds. Of the total violence on the city area the city centre accounts for 8%. Although violence also fell in the remaining areas of the city area, the reduction over the same period was only 3%. The greatest monthly reductions in violence in the city centre directly correlate to periods when licenced premises were closed due to Covid restrictions. It can be seen therefore that the number and capacity of licenced premises in the city centre directly affect the levels of violence.
3. A long term partnership plan is in place to create and maintain a city centre that is safer, more accessible and attractive and with more choice. The aspiration is to continue to have a varied mix of clientele visiting the City to enjoy its night time economy, to keep improving our offer and improve and exceed perceptions by being varied, exciting but

safe and relaxing. Nottingham's Purple Flag accreditation, awarded again in 2020 for the eleventh consecutive year recognises that the City Centre is managing its night time experience for the benefit of all users, including operators, residents, tourists and visitors. There is no will to stifle the growth of Nottingham as a place of enjoyment, just to limit the venues which are likely to generate violence and ASB and tarnish the City.

4. Nottingham has two Universities, a National Ice Arena, two theatres, prominent sporting venues and excellent transport links by road, rail, tram and bus. Nottingham remains the region's capital for entertainment attracting local residents, visitors from around the UK, and international interest, all of whom want to enjoy the city centre night time economy.
5. A large proportion of incidents of assault, disorder, criminal damage and drunkenness that take place in city centre licensed premises are associated with a number of 'repeat premises'. The Licensing Team monitor these premises on a daily basis.
6. In general we have a very good working relationship with most city centre venues. Premises that have had violence and disorder are managed in the form of a meeting by the Licensing Team. During the meetings each incident is discussed and attributed to the premise, or not, depending on evidence. Premises that have exceptionally high levels of disorder or breach their licensing conditions are given written warnings and advised to improve their performance or review proceedings will be considered. This is proving an effective method of reducing the incidents within the premises themselves. The previous CIP meant that should an operator lose their licence, it would be much harder if not impossible to get another licence in the most lucrative City Centre area, so an interest in protecting the licence through good management should have a positive impact.

The Night time culture – 2019/20 (2020 to 2021 is ignored due to Covid restrictions).

7. The culture associated with the Night Time Economy is made up of a number of phases
  - a. Early evening "pre-loading" – the trend is to purchase alcohol cheaply from "off licences", including the major supermarket chains. This is not a new phenomenon and is not unique to Nottingham's NTE . In this way people can start to get drunk

cheaply before they even come into the city. Early evening (19:00 to 21:59) hours sees violence commonly occurring in open spaces, albeit that level of violence is significantly lower than later in the evening. Given the cheap price of alcohol from off licences, having the first few drinks outside the City can make a huge difference towards the cost of a night out. The ‘off licences’ cater for an increasing trend in “preloading” and in part provide the fuel for the street drinkers in Nottingham. It is the ‘pre-loading’ phenomenon that is thought to have caused the reduction in early evening incidents as users of the city centre now arrive later in the evening having already consumed large quantities of alcohol. During this time, incidents are generally low, (see NTE Statistics & Charts 2021).

- b. Night Time – 2200 to 0359hrs – the trend has been for violence to commonly occur inside venues as foot traffic starts to slow down – revellers are either inside a venue or making their way home. Pre-loaders are arriving in the city at a later time of the night; this can be as late as 22.30 – 23.30 with people hoping to arrive when there is a party atmosphere and not before. Between 2200-0059hrs, levels of incidents have risen, however the peak time is between 0100-0359hrs. The city is still busy between 03.00 and 04.00hrs, often thereafter, as a natural consequence of arriving in the city later means that people want to stay later.
- c. Return to normality. As the night draws to a close, i.e. between 04:00 and 06:00hrs, the trend for violence now commonly moves back towards open spaces. As the amount of customers in the city increases later into the evening, our ability to deal with any problems created reduces. Additionally, the infrastructure of the city is also less able to cope; the tram is an excellent example of a large transporter of people but the last trams out of the city are mostly between midnight and 0100hrs. There are some late night bus services but the capacity of the transport infrastructure is greatly reduced. The dispersal of large volumes of people in the early hours of the morning requires large numbers of taxi cabs, this is their busy period. At all times outside of this, there are consequently many more cabs for hire than are required. The few venues which are still open during this time suffer alcohol fuelled incidents around the door as drunken individuals try to gain entry rather than leave the city. Arguably, being open prolongs the NTE and its effects. Venues open at this hour are predominantly of the vertical drinking type.

## Crime and Disorder Trends

8. There are certain crime and disorder trends that impact on the night time behaviour in the centre of Nottingham. The first of these is the growing student population; Nottingham has two continually expanding Universities, collectively they have approximately 65000 students who swell the numbers of drinkers in the city during term time. This is an approximate increase of 50% since the last review 3 years ago. Student accommodation within the City Centre has increased, making it very easy and tempting to literally step out of the front door and become part of the night time economy. Many licensed premises target the student community, particularly the larger venues. Hence, during term time on weekday nights, we have peaks of activity where demand is almost as busy as a Friday or Saturday night, as a result of 'Student Nights' and similar promotions. Further, we see a number of events organised at venues during week days to attract students from across the country. These students visit the city for one night using bespoke transport such as a number of organised coaches, and the normal transport infrastructure. A greater number of vertical drinking venues within the city would lead to greater midweek capacity for such events and their associated issues and policing requirements.
  
9. University students' impact on crime in a number of ways, namely:
  - they are very often the victims of crime;
  - Statistically 18-30 year olds account for the vast majority of both offenders (54%) and victims (over 48%);
  - A high proportion are immature drinkers, thus more markedly affected by alcohol;
  - Students are mostly within the '16-24' age group, which already forms the majority of both victims and perpetrators of alcohol related violence and disorder;
  - Students are responsible for a good proportion of alcohol seizures, much of this taking place within the Lenton area related to pre-loading or pre-night out parties and their associated ASB issues.
  
10. Nottingham has become a centre for leisure tourism, a fact that can be evidenced by the sharp growth in the number of hotel rooms, in and around the City Centre over recent

years. Prior to Covid restrictions, each weekend Nottingham attracted a large influx of people wanting to take part in the nightlife, adding to the numbers already present. There are dedicated websites that advertise to groups, such as Hen and Stag parties, offering guides to which bars to visit and where to stay overnight. Rather than take in the cultural experience, the aim of these parties is often to maximize their alcohol intake, usually within vertical drinking establishments.

11. The effect of having large numbers of people in drink on the streets at night is an increase in the incidents of anti-social behaviour. This ranges from littering, to the prevalence of urinating in the streets and doorways of premises within the city centre. The police regularly receive complaints from owners of business premises and residents of City Centre accommodation about this type of behaviour. It can taint the experience of early morning visitors to the city in addition to those enjoying the NTE.
12. The number of officers available to police the city centre on a Friday or Saturday night is limited and resources have to be balanced against other competing needs throughout the force area. Additional vertical drinking establishments will make our job much more difficult especially if we see an influx of larger volume premises, namely those with over 400 capacity. Demand will be created, of the sort which arguably will cause alcohol related issues rather than culturally enrich the city. In order to police this activity on Fridays and Saturdays, the police have to adopt a pragmatic approach. NTE Policing is based around high profile foot patrols during the early part of the evening, meeting people as they arrive in the city, gaining an intelligence picture of any large groups arriving and paying particular attention to known ‘hotspots’. We aim to defuse tension and conflict and adopt an early intervention approach with the use of our section 35 powers to issue “direction to leave an area” orders.
13. Another factor that contributes to city centre violence and disorder is late night fast food outlets. It is the experience of the police that when people leave late night premises, a significant proportion tend not to leave the city centre immediately. They congregate at fast food outlets and the queues at those premises become flash points for disorder and violence. McDonalds at Angel Row and Clumber Street appear to have the highest level of violence, compared to similar premises. There is a culture of eating following the consumption of alcohol. As a result of people being in the city at a later time, late night

refreshment venues are also opening later, if not all night. It is not uncommon to find such premises employing door staff to maintain order, both within the venue and in the queue. These locations themselves can become a flashpoint for violence between customers in drink

14. The previous Cumulative Impact Policy has been vital in recent years. It has been very helpful to potential applicants who have been able to consider whether they wished to proceed with an application, strong guidance for local authorities in considering applications and most importantly to local people as it has helped produce a baseline from which authorities and communities have been able to build work to address the array of alcohol related and other social issues affecting these areas.

#### Observations from the Analysis

15. Previously the City Council has deemed it necessary and proportionate to have a Cumulative Impact Policy in place and we have seen the benefits of that decision. If the Cumulative Impact policy is lost, the proactive measures on offer will reduce, therefore limiting the control within the City Centre. The spread of licensed premises will begin with the knock on effect that alcohol related crime and ASB will increase, impacting the Night Time Economy and reputation of Nottingham City. The police are aware of the impact Covid restrictions have had particularly in the licencing industry and the long term implications on which businesses remain is still not clear. However our aspiration is not to reduce the number of licence premises or restrict the economic development of this sector but to ensure we have the tools to operate a partnership approach and control new applications fairly and consistently to ensure new operators are responsible and promote the licensing objectives, ensuring a safer Nottingham for all.
16. I have outlined how we make good use of powers available to us under other legislation to tackle problems in and around licensed premises. I have considered all the analysis before me and through past experience and knowledge, I fully support the implementation of Cumulative Impact Assessments (CIA) to which the Licensing

Authority will have regard when considering applications, covering the same areas as the zones previously established and which have been of immense benefit in recent years. The issues the CIAs will seek to address are current, serious and important, and it is vital that the opportunity to object to applications based on these areas for focus remain.

Dated the 17<sup>th</sup> July 2021

Signed: Insp Paul Gummer