

Cumulative Impact Assessment – Nottingham City Area

APPLICATION FOR THE IMPOSITION OF A CUMULATIVE IMPACT  
ASSESSMENT COVERING THE NOTTINGHAM CITY CENTRE, BERRIDGE,  
HYSON GREEN, ARBORETUM and RADFORD AREAS.

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WITNESS STATEMENT OF Insp Luke Todd

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Background

1. I am a Police Inspector, serving with Nottinghamshire Police, currently stationed at Radford Road. I am the supervising officer responsible for the City Police Licencing team who are currently based at Byron House.
2. As of July 2021, there were 432 premises of all types licensed for the sale of alcohol within the city centre, this has increased from 397 in April 2018 when the CIA was last reviewed.
  - 432 Licenced premises (April 2018 there were 397)
  - 189 Public houses and clubs
  - 147 Restaurants
  - 42 Off licences
  - 11 Hotels
  - 5 Open/Outdoor Space
  - 3 takeaways
  - 2 Cinemas
  - 2 Theatres
  - The rest are classified as other as they don't firmly fit into any of the above categories
3. As of July 2021, there were 47 off licences in the Radford, Hyson Green and Lenton areas. This is down from 55 in April 2018.
4. The saturation zone has allowed Nottinghamshire Police to prevent higher risk venues, such as vertical drinking establishments, from obtaining a licence. In the period from the previous review in March 2018 to March 2021 in the saturation zones there have been 84 Premises licence applications. All were granted with the exception of three which went to a panel hearing, one being granted and two refused. There have been 117 variations to the Premises Licences with 1 going to a panel hearing and then being granted.
5. The saturation Zone by no means stops any new application or the regeneration of the City centre as can be seen from the above figures. Each application is considered on its own merit, given the nature, style and location of the premises. The Police Licencing team are there to ensure the area can remain safe for the public to live, work and visit. By keeping the venue types

and numbers appropriate and monitoring the compliance of conditions they can maintain safety with the resource available.

6. Whilst much of the above statement refers to the City Centre area alcohol issues, the impact of alcohol saturation on Radford, Lenton and the Hyson Green area cannot be overlooked. The previous CIA restricted the expansion of further off licences. In addition to the greater availability of alcohol, the competition factor can have an effect on prices leading to cheaper, more widely available product. This has an effect on both vulnerable substance users and students. There are a number of Framework properties for vulnerable persons around the Radford area, those residents having easy access to alcohol and the consumption of it around the Forest Recreation Ground and general area leads to an increase in ASB, for the area to become a magnet for street drinkers.
7. The proliferation of cheap alcohol also has an effect on the Radford and Lenton areas, the student drinking culture is to pre-load with drinks in their accommodation prior to going out into the City. This results in both noisy nighttime ASB and parties, plus is an easy source for aforementioned pre-loading for those visiting the City.
8. Despite much work by statutory authorities, partner agencies, communities and individuals, there is still a significant volume of alcohol related disorder, violence and other crimes across the Arboretum Ward & Radford & Park Ward. The limiting of both extensions to licensing hours and new licences prevents deterioration in existing issues which Police and others are working to tackle. This is shown in Appendix 2 where due to the Covid restriction most types of crime have reduced, however we have seen an increase in violent crime in the same period in this area.
9. The high concentration of persons with complex needs who misuse alcohol results in criminal and antisocial behaviour. It is essential therefore to control the widespread availability of alcohol and work closely with existing licensed premises to ensure adherence to licence conditions and legislation. In addition, when new licenses are applied for, to give detailed scrutiny and in doing so ensure that often already difficult local environments are not made worse by further alcohol sales.
10. Alcohol dependent street drinkers congregate at locations in Arboretum Ward and Radford area. Calls for service to the police and council evidence the increase in anti-social behaviour, noise, litter and criminal offences from this group. Combatting the problem of street drinking is a priority for the Arboretum Ward.
11. The previous Cumulative Impact Policy has been vital in recent years. It has been 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

12. When we consider the analysis of the current statistics, we cannot ignore the fact that the Covid situation has made comparing the figures an unproductive tool for this assessment. The 2018/19 stats cannot then be compared to the 2019/20 and 2020/21 due to the City centre effectively being closed for 18 months during this period. Therefore, we will need to wait for two years of statistics post easing of lockdown restrictions before we can fully understand the impact on the night-time economy. We must also consider that we do not yet know how many of the licenced premises will remain open due to the economic impact of the restriction, this may cause an influx of new applications to take the place of closed premises. The licencing teams are aware of this issue and will take a pragmatic and sympathetic approach to the regeneration of the night-time economy.
13. Previously the review has deemed it necessary and proportionate to have a Cumulative Impact Policy in place and we have seen the benefits of that decision. In addition, police and partners have been proactively policing the NTE and the street drinking and ASB issues in Radford, Lenton and Hyson Green areas. If the Cumulative Impact Assessment is not implemented the proactive measures available will be reduced, therefore limiting the control within the City Centre and wider City area. This could result in an unmanageable increase of licensed premises and, as a consequence, an increase in alcohol related crime and ASB. This would negatively impact crime data, the policing of the Night Time Economy, the perception of safety and the reputation of Nottingham City. Premises licences are still in existence on a number of vacant premises within the City which allows natural but controlled growth to agreed capacity. The Cumulative Impact Assessment would give us the partnership approach and the control to contain this expansion and demand as well as being consistent with the duty to promote the licensing objectives, ensuring a safer Nottingham for all.
14. I have considered all the analysis before me and through past experience and knowledge, I fully support the implementation of a Cumulative Impact Policy (CIP) to which the Licensing Authority will have regard when considering applications, covering the same area as the zone previously established for the Citye and which has been of immense benefit in recent years. The issues the CIA will seek to address are current, serious and relevant and it is vital that the opportunity to object to applications based on this area of focus remain.

Dated the 22<sup>nd</sup> July 2021

Signed: Insp Luke Todd