



Cumulative Impact Assessment 2024 to 2027 Licensing Act 2003

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Introduction

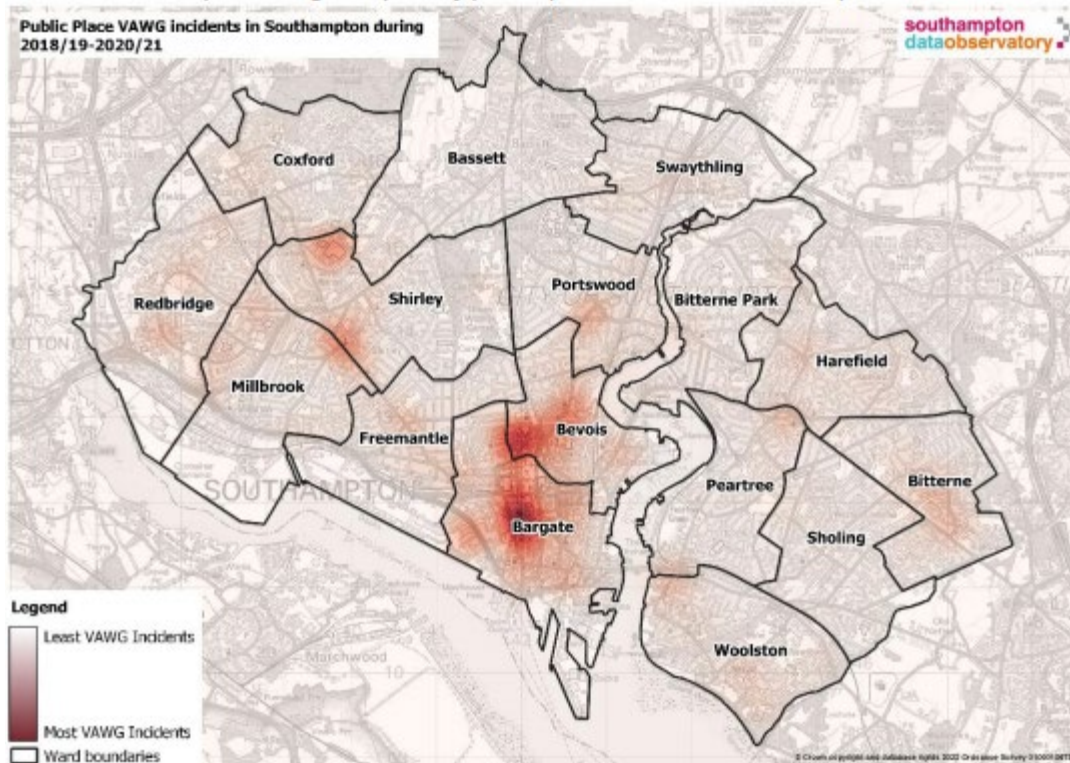
1. 'Cumulative impact assessments' (CIA) were introduced into the 2003 Act by the Policing and Crime Act 2017, with effect from 6 April 2018. Cumulative impact is the potential impact on the promotion of the licensing objectives of a number of licensed premises concentrated in one area. This should not be confused with the issue of "need" which relates to the commercial demand for licensed premises and cannot be taken into account when determining licensing applications.
2. The last CIA was conducted alongside the adoption of the Statement of Licensing Policy adopted in 2021. The impact policy is detailed in Section 6 of that document.

Cumulative Impact Assessment

3. The assessment in 2021 supported the continuance of the previously established Stress Areas, namely London Road/Bedford Place, Above Bar Street and Bevois Valley.
4. The police and other partners were asked to review any data they had for the authority to consider in a review of the cumulative impact policy. Hampshire and Isle of Wight Constabulary produced a report based on data between 2020 and 2022.
5. The police report talks about 'zones'. These are numbered 1 to 5 and are different areas of night time economy activity in Southampton.
 - Zone 1 London Road/Bedford PI
 - Zone 2 Above Bar street
 - Zone 3 high Street/Oxford St
 - Zone 4 Bevois Valley
 - Zone 5 Leisure World
6. The report concludes Zones 1 and 2, which equate to the stress areas of the same names, still have high incidents of crime and disorder. It identifies Zone 4 has seen a reduction in such incidents and recommends it is removed as a stress area. Zone 3, in particular around Oxford Street has seen an increase and recommends Oxford

street becomes a stress area. The report adds there are clusters in both Charlotte Place and St Mary's Road and both of these should be incorporated into the stress areas. A copy of the police report is part of this assessment and is attached as Appendix 1.

7. The Community Cohesion Team provided a heat map of Violence Against Women and Girls incidents between 2018 and 2021. This shows high concentrations of incidents in the city centre including Above Bar Street and London Road/Bedford Pla areas. It also showed Bevois Valley to have a high concentration of incidents.



8. In light of this information Southampton City Council undertook a consultation exercise in accordance with the legislation that proposed retaining the London Road/Bedford Place and Above Bar Street stress areas unchanged. Retaining Bevois Valley stress area and extending it to include Charlotte Place and to create a new stress area in Oxford Street. Maps of the proposed areas form part of the assessment and are attached as appendix 2.
9. The consultation ran from 4th September until 29th October 2023 and received 54 responses. A report summarising the responses is part of the assessment and is attached as appendix 3.

10. The majority of responses are in support of the proposals. There are a number of comments supporting the inclusion of Oxford Street as a stress area. There are also a number of comments expressing dissatisfaction with previous decisions to grant licences within existing stress areas.

11. Responses from officers to the constructive responses are attached as appendix 4.

Conclusion

12. The Assessment has been carried out in accordance with the Section 5(a) of the Licensing Act 2003. This Assessment has been published because the Council considers that the number of relevant authorisations in respect of premises in one area described in the assessment is such that it is likely that it would be inconsistent with the Council's duty under the Act to grant any further relevant authorisations in respect of premises in that part.

13. With immediate effect the stress areas identified in section 6 of the Statement of Licensing Policy of Southampton City Council will be amended to be as identified in appendix 2 of this assessment. These cover 4 areas:-

- London Road/Bedford Place
- Above Bar Street
- Bevois Valley
- Oxford Street

Appendixes

1. Police report
2. Maps of stress areas
3. Report summarizing consultation responses
4. Officer responses to consultation comments



HAMPSHIRE & ISLE OF WIGHT

CONSTABULARY

Cumulative Impact Policy Zones – Southampton

01/01/2020 – 31/12/2022

Date: April 2023

Version Control: 2

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Introduction

In 2009, Southampton City Council introduced the Cumulative Impact Policy (CIP) zones within their Statement of Licensing. There is a requirement to review the licensing policy every five years and the CIP policy every three years and this report supports the most recent review of the CIP zones.

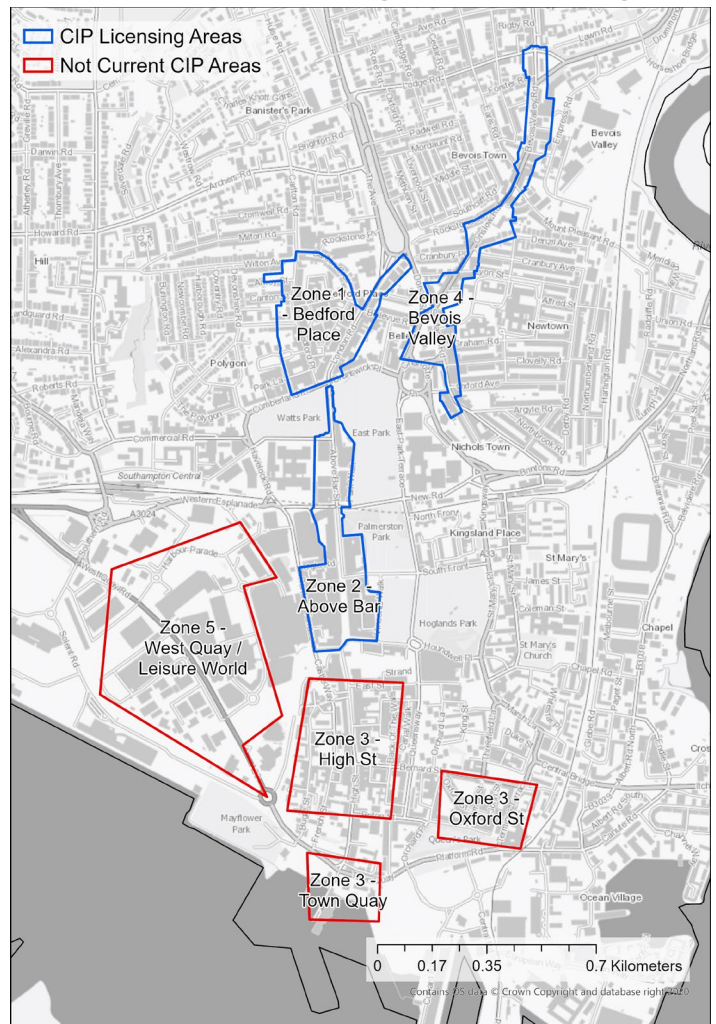
The Licensing Authority in the previous review (pre-pandemic) believed that three areas are suffering from Cumulative Impact and are designated as ‘Zone 1 – Bedford Place’, ‘Zone 2 – Above Bar’ and ‘Zone 4 – Bevois Valley’. Zone 3 and 5 are not currently stress areas.

The district has a 24-hour, mixed use city centre surrounded by a vast geographical spread of residential areas. Operationally this imposes significant demands upon emergency services and the wider partnership.

The successful and vibrant Night Time Economy (NTE) in Southampton attracts tourists, local residents and students to the various licensed venues.

Policing the NTE places a heavy demand on limited resources. Hampshire & Isle of Wight Constabulary continue to work in partnership to reduce alcohol related crime and disorder and reduce the wider demand on policing and public health.

Figure 1: CIP Licensing Areas



Hypotheses

There has been an indication that the designated stress areas may need adjusting due to increases or decreases in offending. The following two hypotheses will be tested to determine if this should be the case.

Hypothesis 1: 'Zone 4 – Bevois Valley' has seen a reduction in NTE offences and is no longer required to be a CIP zone.

Hypothesis 2: 'Zone 3 – Oxford Street' has had an increase in NTE offences and so should become a designated zone.

Methodology and Data Gaps

The offences included for analysis have a start date from 1 January 2020 to 31 December 2022 to assess the volume of offences in each zone but also as a proportion of NTE offences for the district as a whole.

Crime Types

- Violence with Injury
- Violence without Injury
- Rape and Other Sexual Offences
- Possession of Drugs
- Possession of Weapons Offences
- Public Order Offences

Certain public order offences have been excluded as they only relate to breach of orders for example SHPOs, CBOs or notification orders, none of which had NTE flags on. The offence types included may differ slightly from the previous review report as it listed broad categories so a direct comparison of crime volumes between previous years cannot be made. However, a comparison between the proportions of offences occurring in the zones out of the district total allows stress areas to be highlighted.

Due to crime data integrity (CDI) issues, a manual review of addresses has been undertaken to improve the understanding of offences linked to the NTE. Venues such as pubs, bars, clubs etc. linked as the occurrence address have had a flag added if the offence took place between 18:00 and 05:59. Whilst there is still issues with data quality even with this method, it has highlighted further offences which should have had the NTE flag on RMS. All offences with the flag originally on the crime record have remained the same.

District Overview

Table 1: Southampton District Offences by Crime Type and Year

Table 1 provides a breakdown of offences across the three year period by crime type. Due to the impact of the pandemic it is difficult to analyse the differences between the years. However, Figure 2 shows the breakdown by month for 2021 and 2022 in order to show the differences between periods where there were no restrictions on social gathering or venues opening.

Crime Type	2020	2021	2022
Violence with Injury	3,661	3,884	4,189
Violence without Injury	7,697	9,271	9,459
Rape	330	353	377
Other Sexual Offences	503	655	708
Possession of Drugs	914	867	864
Possession of Weapons Offences	368	433	472
Public Order Offences	2,947	3,929	3,852
Total	16,420	19,392	19,921

Figure 2 shows a decrease in all months from July in 2022 when compared to 2021 apart from November which saw a 1.2% increase. The greatest decreases were seen in September (-13.4%), December (-12.6%) and October (-8.8%).

Figure 2: Total District Crime by Month (2021 and 2022)

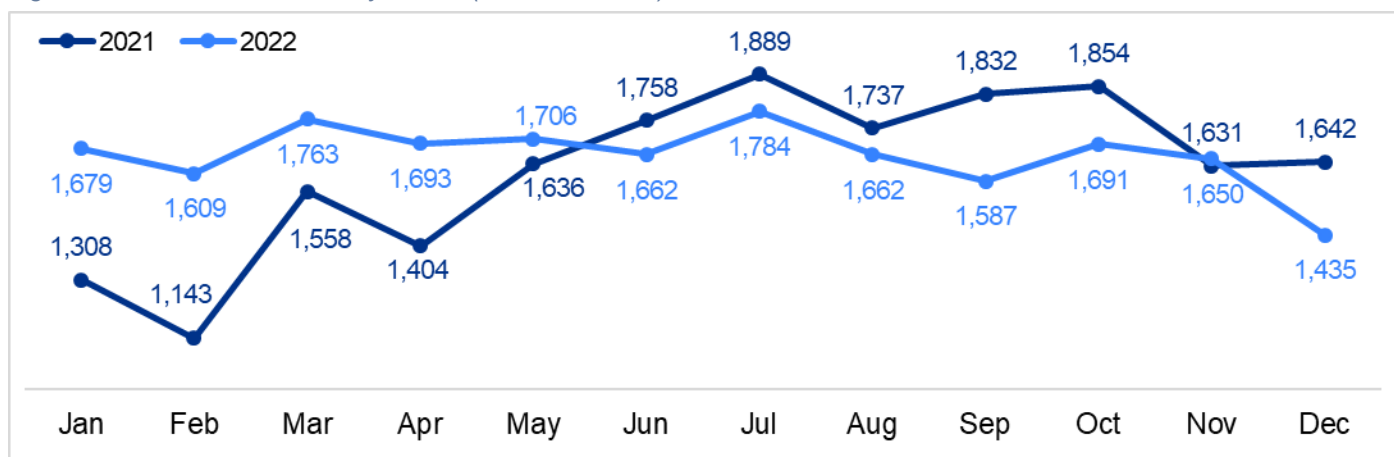


Table 2: Southampton District Offences by Crime Type and Sector in 2022

Table 2 shows all crimes within the district, broken down by sector. Central has the highest proportion of crime, followed by the West. Central also has the largest proportion of all crime types except violence without injury which is highest in the West.

Crime Type	Central	East	North	West
Violence with Injury	36%	19%	18%	28%
Violence without Injury	25%	23%	22%	30%
Rape	38%	19%	17%	26%
Other Sexual Offences	35%	18%	18%	29%
Possession of Drugs	43%	13%	16%	28%
Possession of Weapons Offences	39%	18%	18%	25%
Public Order Offences	31%	18%	21%	30%
Total	30%	20%	20%	29%

NTE Offence Overview

Table 3 shows the breakdown of NTE offences identified through the flag on RMS. There were 1,302 offences in 2022.

Violence with injury accounts for 40% of offences, followed by violence without injury at 30% and public order at 16%.

Table 3: Offences with a NTE Flag on RMS by Crime Type and Year

Crime Type	2020	2021	2022
Violence with Injury	197	398	521
Violence without Injury	118	269	394
Rape	10	24	19
Other Sexual Offences	27	57	96
Possession of Drugs	11	14	36
Possession of Weapons Offences	9	17	30
Public Order Offences	51	146	206
Total	423	925	1,302

Table 4: NTE Offences (Venue Review and RMS) by Crime Type and Year

Crime Type	2020	2021	2022
Violence with Injury	233	447	555
Violence without Injury	160	315	461
Rape	10	24	21
Other Sexual Offences	29	69	101
Possession of Drugs	14	17	41
Possession of Weapons Offences	11	17	31
Public Order Offences	66	170	221
Total	523	1,059	1,431

After the manual review of address details, the number of NTE offences increased to 1,431 in 2022. This is shown in Table 4.

NTE offences made up 7.2% of all district crime in 2022. This increases to 14.3% for other sexual offences and 13.2% for violence with injury.

Comparing 2021 and 2022, there were 35% more NTE offences in 2022, however, the impact of social restrictions due to the pandemic will account for this. When looking after restrictions were removed, in 2022 there were 28% more offences in July when compared to 2021 but all following months saw a decrease. The largest decreases were seen in August and December (both -33%) and also September (-30%).

Table 5: NTE Offences by Crime Type and Sector in 2022

Crime Type	Central	East	North	West
Violence with Injury	80%	5%	5%	10%
Violence without Injury	80%	3%	5%	11%
Rape	90%	0%	5%	5%
Other Sexual Offences	89%	2%	3%	6%
Possession of Drugs	83%	0%	2%	15%
Possession of Weapons Offences	90%	0%	0%	10%
Public Order Offences	63%	7%	10%	20%
Total	79%	4%	6%	12%

When looking at NTE offences only, Southampton Central sector has 79% of offences. This increases for certain offence types such as rape and weapons possession (90%) and decreases for public order (63%).

Table 6: Temporal Analysis of NTE Offences in 2022

Day/Time	17	18	19	20	21	22	23	00	01	02	03	04	05	Total
Monday-Tuesday	0	2	10	6	8	10	11	6	3	4	4	8	0	72
Tuesday-Wednesday	0	2	9	8	7	10	9	14	7	11	8	3	2	90
Wednesday-Thursday	3	1	9	6	9	10	17	11	21	11	7	0	3	108
Thursday-Friday	1	1	8	8	15	16	10	15	10	11	11	7	4	117
Friday-Saturday	1	8	12	11	27	27	56	57	64	59	41	16	8	387
Saturday-Sunday	4	10	14	18	32	54	79	68	71	90	50	22	13	525
Sunday-Monday	2	6	15	6	15	15	8	10	6	8	13	1	1	106
Total	11	30	77	63	113	142	190	181	182	194	134	57	31	1,405

Table 5 shows the temporal analysis of NTE offences in 2022 by day and time. The table shows offences peak between 02:00-02:59 on Sunday, followed by 23:00-23:59 on Saturday. The hour from 02:00 has the highest volume of NTE offences across the week, followed by 23:00. Offence volumes increase from 21:00 and then drop off significantly from 04:00. The majority of offences are concentrated around Friday and Saturday nights with the latter seeing the highest volume. There is a slight increase on Wednesday compared to other weekdays which may be linked to students as the universities often have social nights on this day.

CIP Zones

The CIP zones within the city centre represent 1.7% of the district area (0.87 km²) but in 2022, 10% of crime. The proportion increases for some crime types with 17% of other sexual offences for the district and 15% of drug possession within the zones in 2022. Violence without injury and rape have lower percentages within the zones with 8% and 7% respectively in 2022.

Table 7: Percentage of Crime within CIP Zones by Crime Type

Crime Type	2020	2021	2022
Violence with Injury	9%	13%	14%
Violence without Injury	5%	6%	8%
Rape	5%	5%	7%
Other Sexual Offences	10%	13%	17%
Possession of Drugs	6%	8%	15%
Possession of Weapons Offences	10%	9%	10%
Public Order Offences	9%	10%	11%
Total	7%	9%	10%

Table 8: Percentage of NTE Crime within CIP Zones by Crime Type

Crime Type	2020	2021	2022
Violence with Injury	52%	67%	65%
Violence without Injury	53%	61%	67%
Rape	20%	13%	48%
Other Sexual Offences	72%	75%	73%
Possession of Drugs	36%	65%	78%
Possession of Weapons Offences	64%	59%	58%
Public Order Offences	52%	49%	47%
Total	52%	61%	64%

The zones contain a much higher proportion of NTE crime within the district with 61% (650) in 2021 and 64% (911) in 2022. This increased to 75% of other sexual offences in 2021 and 78% of drugs possession in 2022. 13% of rape offences linked to the NTE were within the zones in 2021 and 48% in 2022.

Zone 1 – Bedford Place

This zone is located in the main NTE hub in the city and has the highest volume of offences out of all CIP areas. It represents 0.2% of the district area (0.11km²). Across the three years, the zone had the highest proportion of NTE offences in 2022 at 25% (15% in 2020 and 27% in 2021).

Excluding 2020, there were more sexual offences linked to the NTE in Zone 1 than there were in areas not within a stress area (39% in 2021 compared to 25% not in a zone; 30% in 2022 and 27% not in a zone).

In 2022, 32% of NTE weapons possession offences were in Zone 1 and 42% were not within any CIP area. There were also 37% of NTE drugs possession offences in the zone compared to 22% not within an area.

The proportion of each crime type linked to the NTE has decreased within this zone with violence with injury decreasing from 29% in 2021 to 26% in 2022. See Appendix 1 and 2 for more detail.

Saturday night had the highest volume of offences (152, 44%), followed by Friday (98, 28%). 58% (202) of offences occurred between 00:00-02:59.

Figure 3: Zone 1 - Bedford Place with NTE Heat Map

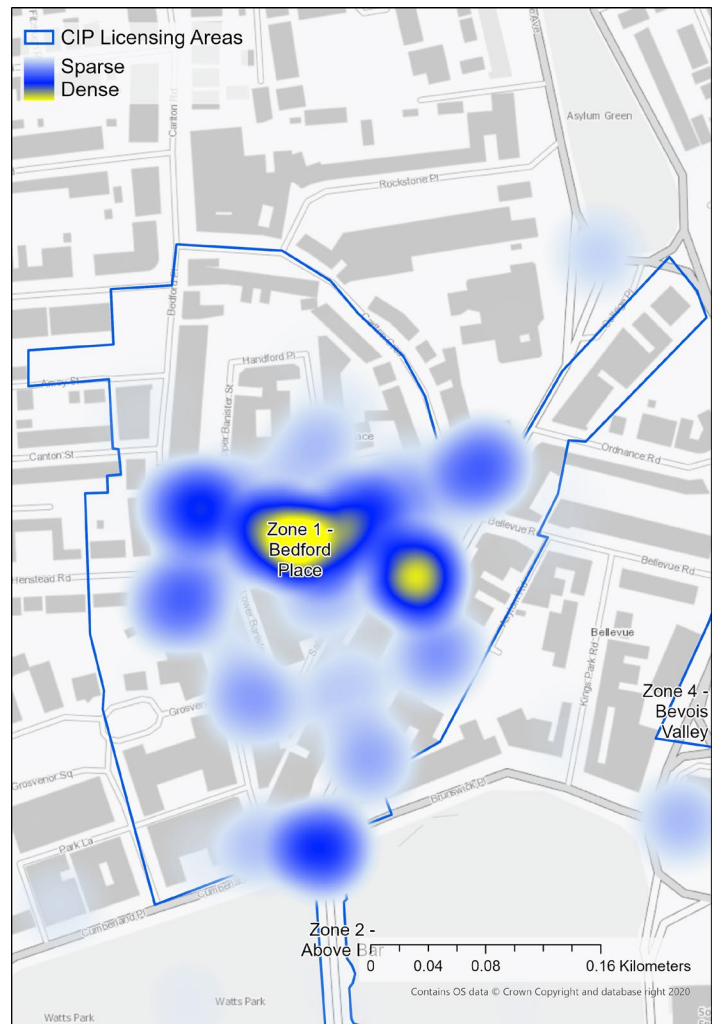


Table 9: Temporal Analysis of NTE Offences in Zone 1 in 2022

Day/Time	17	18	19	20	21	22	23	00	01	02	03	04	05	Total
Monday-Tuesday	0	0	2	0	0	2	2	4	0	2	0	0	0	12
Tuesday-Wednesday	0	0	0	0	1	1	4	10	3	7	2	1	0	29
Wednesday-Thursday	0	0	2	0	0	1	5	2	3	4	2	0	0	19
Thursday-Friday	0	0	0	1	3	1	2	1	6	2	4	1	0	21
Friday-Saturday	0	0	1	1	4	3	11	9	24	22	15	1	7	98
Saturday-Sunday	1	2	0	0	10	9	18	34	27	36	11	3	1	152
Sunday-Monday	0	0	2	0	0	1	2	0	2	4	6	1	0	18
Total	1	2	7	2	18	18	44	60	65	77	40	7	8	349

Zone 2 – Above Bar

This zone covers the main commercial street in the district but the northern end has NTE venues in the Guildhall Square area. The area is a very similar size to Zone 1, making up 0.2% of the district (0.11km²).

Zone 2 has the highest volume of offences after Zone 1 (Bedford Place). In 2020, 17% of NTE offences were within the zone, followed by 17% in 2021 and 21% in 2022.

In 2022, there were more drugs possession offences linked to the NTE in Zone 2 than in areas not within a zone in the district (27% compared to 22% not in a zone). In 2021, it had 29% of weapons possession offences compared to 6% in Zone 1.

The proportion of NTE offences within Zone 2 has increased from 2021 to 2022 (17% to 21%). Whereas, this decreased in Zone 1 (27% to 25%).

Weapons possession offences had a higher proportion in 2021 at 29% which reduced to 19% in 2022. Other sexual offences have also increased (14% in 2020, 23% in 2021 and 26% in 2022). See Appendix 1 and 2 for more detail.

Saturday night has the highest volume of offences (140, 48%), followed by Friday (82, 28%). Offences are more spread across the evening than in Zone 1 from 22:00 to 04:59 with peaks at 01:00 and 02:00.

Figure 4: Zone 2 - Above Bar with NTE Heat Map

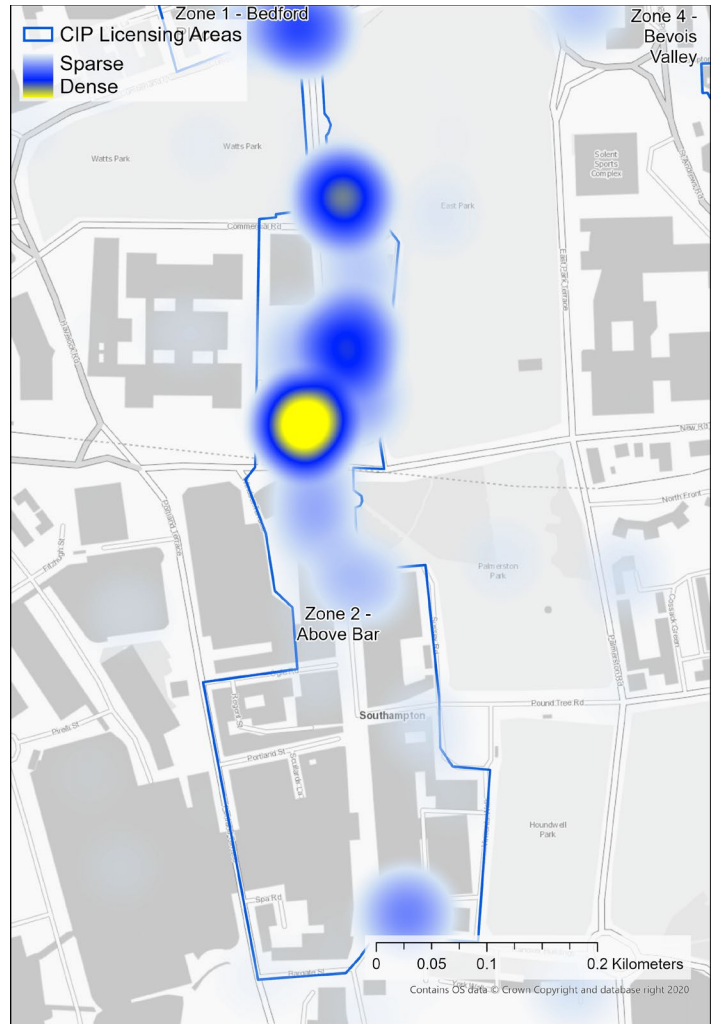


Table 10: Temporal Analysis of NTE Offences in Zone 2 in 2022

Day/Time	17	18	19	20	21	22	23	00	01	02	03	04	05	Total
Monday-Tuesday	0	2	0	0	1	2	1	0	1	0	3	5	0	15
Tuesday-Wednesday	0	0	1	1	0	1	2	1	0	0	3	0	1	10
Wednesday-Thursday	2	0	0	0	0	3	1	1	8	1	0	0	0	16
Thursday-Friday	0	0	2	1	2	1	1	2	1	3	1	1	0	15
Friday-Saturday	0	2	6	4	1	5	11	10	15	17	7	4	0	82
Saturday-Sunday	2	3	5	4	5	10	17	5	21	31	18	10	9	140
Sunday-Monday	0	0	0	0	2	2	2	2	3	1	3	0	0	15
Total	4	7	14	10	11	24	35	21	49	53	35	20	10	293

Zone 3 – High St / Oxford St / Town Quay

Zone 3 (Figure 5) is split into three different areas, the High Street, Oxford Street and Town Quay. These three areas have differing volumes of offences.

Oxford Street has the highest number of offences, equating to 5% of NTE offences in 2021 and 6% in 2022. In 2020, Oxford Street has much lower volumes with only 2% of NTE offences.

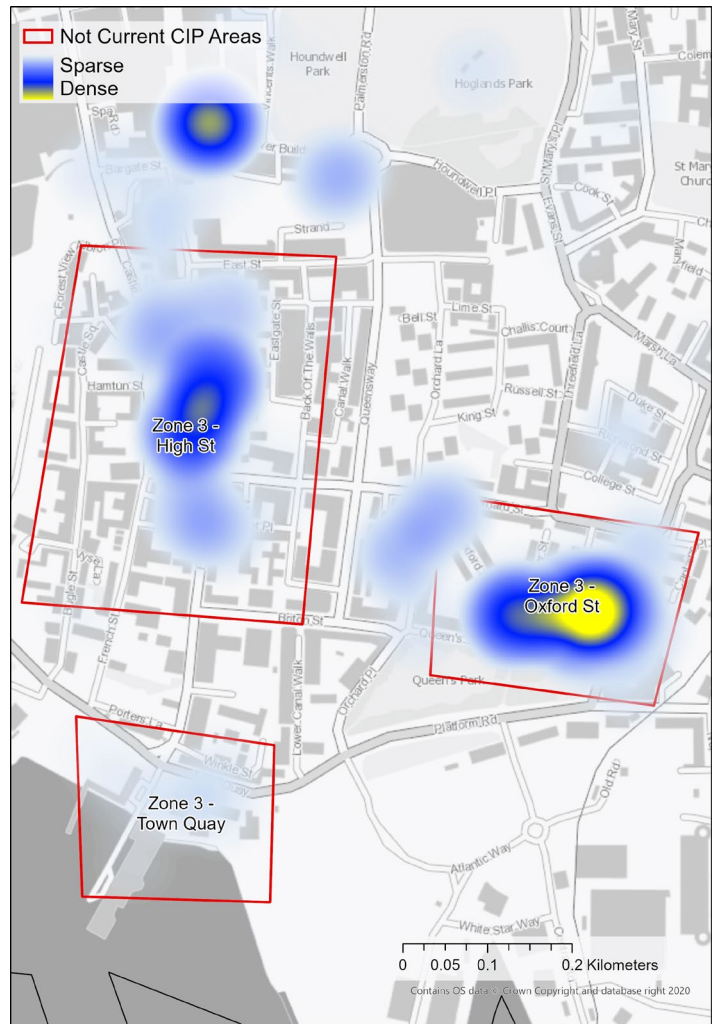
High Street had a higher proportion in 2020 (6%), but this has dropped off over the three year period to 4% in 2021 and 2% in 2022.

Town Quay has the lowest volume of offences with 1% in 2020, no NTE offences in 2021 and only 5 offences (0%) in 2022.

All three areas within Zone 3 had no weapons offences in 2022 and only 4 offences over the previous two years.

This zone makes up a larger proportion of violence without injury offences across all three years (10% in 2020, 11% in 2021 and 10% in 2022) compared to other offence types. See Appendix 1 and 2 for more detail.

Figure 5: Zone 3 with NTE Heat Map



Offences within zone three peak between 23:00-23:59 on Saturday with 22 out of the 24 offences occurring in the Oxford Street zone. There are several incidents with multiple offences linked to them due to multiple victims. The majority 58% were violence without injury offences. Saturday has the majority of offences (56%), followed by Friday (25%). 61% of offences occurred between 23:00-01:59.

Table 11: Temporal Analysis of NTE Offences in Zone 3 in 2022

Day/Time	17	18	19	20	21	22	23	00	01	02	03	04	05	Total
Monday-Tuesday	0	0	2	1	1	0	0	1	0	0	0	0	0	5
Tuesday-Wednesday	0	0	1	2	0	0	0	0	0	0	1	0	0	4
Wednesday-Thursday	0	0	0	0	0	1	0	1	0	0	0	0	0	2
Thursday-Friday	1	0	0	0	1	1	0	1	2	0	0	0	0	6
Friday-Saturday	0	0	0	0	1	2	7	9	5	1	3	2	0	30
Saturday-Sunday	0	2	1	1	2	7	24	7	13	8	2	0	0	67
Sunday-Monday	1	1	0	0	0	0	0	3	0	0	0	0	0	5
Total	2	3	4	4	5	11	31	22	20	9	6	2	0	119

Zone 4 – Bevois Valley

Figure 6 shows Zone 4 located in Bevois Valley. In the previous review, Zone 4 had comparable levels of violence to Zones 1 and 2.

It is a smaller zone than Zone 1 and 2 at 0.09km² (0.2% of the district). It had 6% of district NTE offences in 2020 and 2022 and 2% in 2021. In 2022, Zone 1 represented 25% of NTE crimes which is over four times more than in Zone 4.

The zone had 4% (7) of public order NTE offences in 2021 which is more than that in Zone 3 – Oxford Street but the volumes are low. In 2022, Zone 4 had 14% (3) of NTE rape offences and 11% (11) of other sexual offences but again, the volumes are very low.

In 2022, Zone 4 had more offences than Zone 3 – Oxford Street but less in 2021 (2% compared to 5%). However, the zone covers a larger area and the majority of offences in this zone are located in St Mary’s Road area (see Figure 6).

Friday has the most offences (35%) in Zone 4, followed by Saturday (29%). Friday between 00:00-00:59 has the most offences. Overall, volumes are low and there are no offences prior to 19:00.

Figure 6: Zone 4 - Bevois Valley with NTE Heat Map

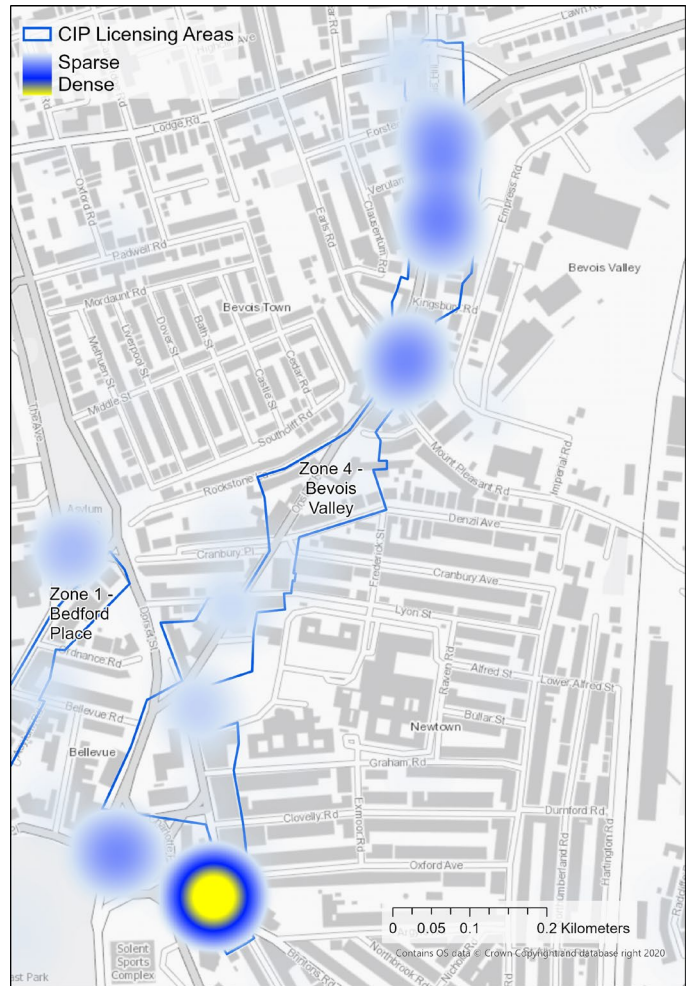


Table 12: Temporal Analysis of NTE Offences in Zone 4 in 2022

Day/Time	17	18	19	20	21	22	23	00	01	02	03	04	05	Total
Monday-Tuesday	0	0	0	1	0	0	0	0	0	0	0	0	0	1
Tuesday-Wednesday	0	0	0	0	1	2	2	0	3	2	0	1	0	11
Wednesday-Thursday	1	0	0	0	1	0	2	3	3	1	3	0	0	14
Thursday-Friday	0	0	0	0	0	0	2	1	0	0	1	0	0	4
Friday-Saturday	0	0	0	0	0	1	0	5	9	5	6	4	1	31
Saturday-Sunday	0	0	1	4	0	0	4	0	2	5	6	3	1	26
Sunday-Monday	0	0	0	0	0	0	0	1	0	1	0	0	0	2
Total	1	0	1	5	2	3	10	10	17	14	16	8	2	89

Zone 5 – West Quay

Figure 7 shows offences in Zone 5 which has the lowest number of offences. It represents 0.6% of the district (0.32km²) and is the largest zone. It represented 6% of NTE offences in 2020 but has decreased with 2% in 2021 and 3% in 2022.

There are very few offences in this zone so temporal analysis is limited. All eight offences at 23:00 on Wednesday are linked to one incident. With that excluded, Saturday has the most offences and across all days, 02:00-02:59 has the most offences in an hour period.

In 2021, 12% (2) of NTE drug possession offences were in this zone but this reduced to 2% in 2022. There were less offences in this zone in both 2021 and 2022 than in Zone 4.

Figure 7: Zone 5 - West Quay with NTE Heat Map



Table 13: Temporal Analysis of NTE Offences in Zone 5 in 2022

Day/Time	17	18	19	20	21	22	23	00	01	02	03	04	05	Total
Monday-Tuesday	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Tuesday-Wednesday	0	0	0	0	1	0	0	0	0	0	1	0	0	2
Wednesday-Thursday	0	0	0	0	1	2	8	0	0	1	0	0	0	12
Thursday-Friday	0	0	0	0	1	1	0	0	0	2	0	2	0	6
Friday-Saturday	0	0	0	0	0	1	0	2	0	2	2	0	0	7
Saturday-Sunday	0	0	0	1	0	0	2	1	0	3	3	2	0	12
Sunday-Monday	0	1	1	0	0	0	0	0	0	2	1	0	0	5
Total	0	1	1	1	3	4	10	3	0	10	7	4	0	44

Density Based Clustering

An alternative mapping method was used to identify clusters of offences based on density rather than mapping them to areas already identified. Figure 10 shows where these are located. This method created clusters using 2022 NTE offence data by highlighting areas with 36 or more offences where the offences are no more than 100m apart. The areas highlighted (Figure 8) are:

- Above Bar / Bedford – some of the offences in the fall outside of Zone 2 but the majority are within the CIP stress area.
- High Street – partly within Zone 2 also with some offences just outside the zone.
- Oxford Street – entirely within Zone 3.
- Charlotte Place / St Mary's Road – falls partly within Zone 4 but some offences remain outside of the area.

Figure 8: Density Based Clustering – 2022 NTE (n. 36)

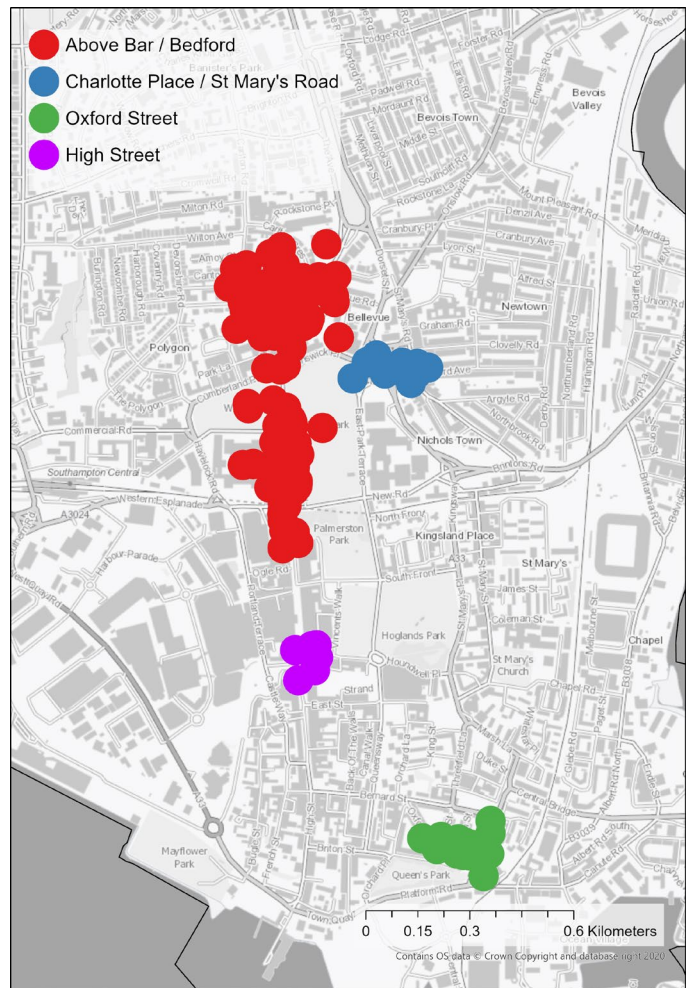
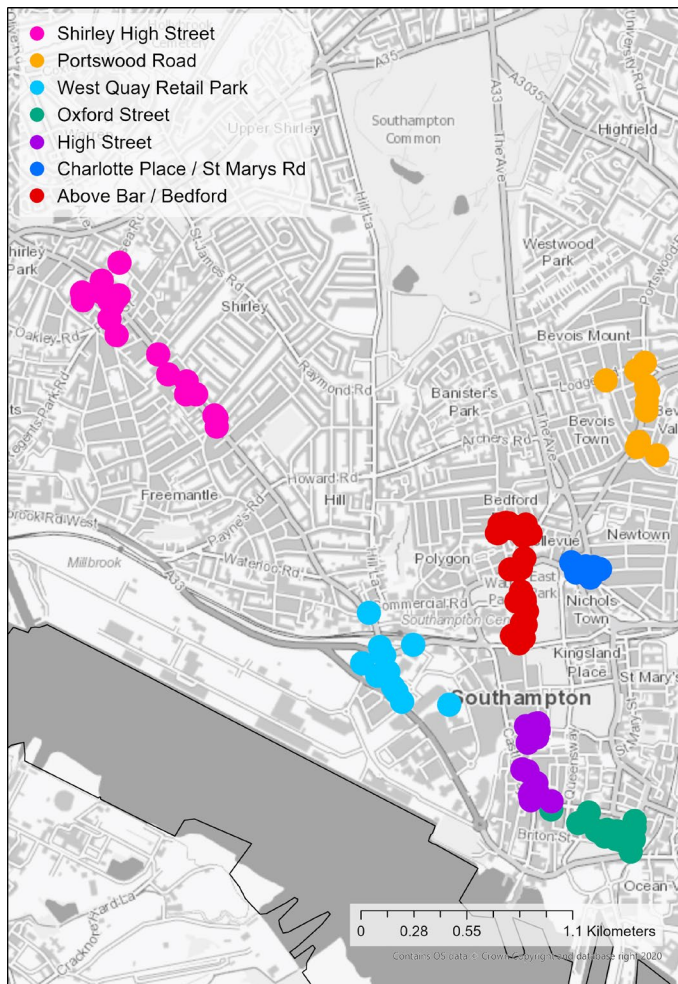


Figure 9: Density Based Clustering – 2022 NTE (n. 24)



Another map (Figure 9) was created which shows areas with 24 or more NTE offences in 2022 with no defined distance between the offences. This has highlighted some clusters around Shirley High Street, Portswold Road and West Quay as well as the areas highlighted in the previous map.

However, these clusters are much larger areas with fewer offences. The density of NTE venues is not as high as in the areas highlighted with 36 or more offences.

The Portswold Road cluster had 41 offences which are spread apart, whereas the Oxford Street cluster in Figure 9 has 81 offences. The Above Bar / Bedford cluster has 457 offences. Shirley High Street has 60 offences over a 1km stretch.

Key Findings and Recommendations

Looking at data from 2020 to 2022, Zone 1 and Zone 2 have seen a significant proportion of district NTE crime. For some crime types such as weapons offences, Zone 1 has seen more offences within the small geographical area than within the rest of the district as a whole.

Both hypotheses have been proven by looking at the NTE offences over the last three years:

- Zone 4 – Bevois Valley has seen a reduction in offences compared to the last review and it is recommended that it should no longer be a designated stress area in its entirety. The proportion of NTE offences for the district is very low.
- Zone 3 – Oxford Street has seen an increase in NTE offences over the three year period. Although the proportion of all NTE offences is still very low, the density based clustering has highlighted that there were 36 or more offences in 2022 within a small geographical area.

Density based clustering for 2022 data has also highlighted a concentration of offences around Charlotte Place and St Mary's Road that falls partly outside Zone 4. This small geographic area should be monitored for a further increase in offending and potentially creating a new CIP area. From the analysis and data within the report, it is recommended that the Cumulative Impact Policy areas should cover:

- Zone 1 – Bedford Place
- Zone 2 – Above Bar
- Zone 3 – Oxford Street
- Charlotte Place and St Mary's Road

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Appendices

Note: Larger images can be found as an attachment to this report (Appendix 3).

Appendix 1: NTE Offences by Zone and Crime Type in 2021

Crime Type	No Zone	Zone 1	Zone 2	Zone 3 - High St	Zone 3 - Oxford St	Zone 3 - Town Quay	Zone 4	Zone 5	Total
Violence with Injury	113 (48%)	34 (15%)	43 (18%)	7 (3%)	4 (2%)	3 (1%)	18 (8%)	11 (5%)	447
Violence without Injury	76 (48%)	28 (18%)	28 (18%)	13 (8%)	3 (2%)	1 (1%)	5 (3%)	6 (4%)	315
Rape	8 (80%)	0 (0%)	0 (0%)	1 (10%)	0 (0%)	0 (0%)	0 (0%)	1 (10%)	24
Other Sexual Offences	8 (28%)	4 (14%)	4 (14%)	4 (14%)	0 (0%)	1 (3%)	2 (7%)	6 (21%)	69
Possession of Drugs	9 (64%)	1 (7%)	1 (7%)	0 (0%)	0 (0%)	0 (0%)	0 (0%)	3 (21%)	17
Weapons Offences	4 (36%)	3 (27%)	0 (0%)	1 (9%)	0 (0%)	0 (0%)	1 (9%)	2 (18%)	17
Public Order	32 (48%)	7 (11%)	15 (23%)	5 (8%)	2 (3%)	1 (2%)	3 (5%)	1 (2%)	170
Total	250 (48%)	77 (15%)	91 (17%)	31 (6%)	9 (2%)	6 (1%)	29 (6%)	30 (6%)	1,059

Appendix 2: NTE Offences by Zone and Crime Type in 2022

Crime Type	No Zone	Zone 1	Zone 2	Zone 3 - High St	Zone 3 - Oxford St	Zone 3 - Town Quay	Zone 4	Zone 5	Total
Violence with Injury	192 (35%)	143 (26%)	119 (21%)	12 (2%)	34 (6%)	0 (0%)	37 (7%)	18 (3%)	555
Violence without Injury	151 (33%)	110 (24%)	111 (24%)	13 (3%)	34 (7%)	1 (0%)	27 (6%)	14 (3%)	461
Rape	11 (52%)	1 (5%)	3 (14%)	2 (10%)	0 (0%)	0 (0%)	3 (14%)	1 (5%)	21
Other Sexual Offences	27 (27%)	30 (30%)	26 (26%)	1 (1%)	3 (3%)	0 (0%)	11 (11%)	3 (3%)	101
Possession of Drugs	9 (22%)	15 (37%)	11 (27%)	0 (0%)	1 (2%)	0 (0%)	4 (10%)	1 (2%)	41
Weapons Offences	13 (42%)	10 (32%)	6 (19%)	0 (0%)	0 (0%)	0 (0%)	2 (6%)	0 (0%)	31
Public Order	117 (53%)	44 (20%)	22 (10%)	6 (3%)	11 (5%)	4 (2%)	8 (4%)	9 (4%)	221
Total	520 (36%)	353 (25%)	298 (21%)	34 (2%)	83 (6%)	5 (0%)	92 (6%)	46 (3%)	1,431

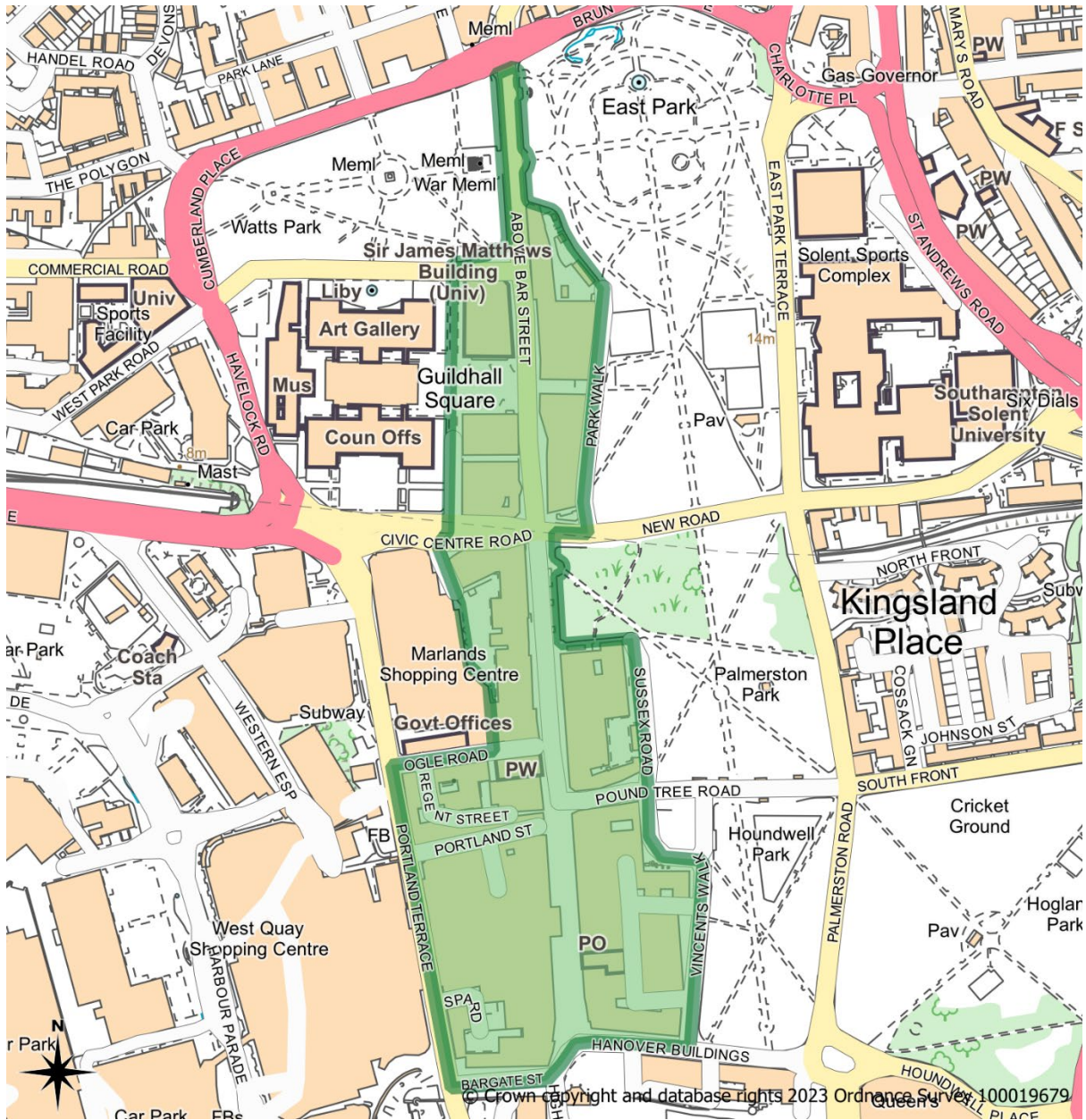
Overview map of Stress Areas



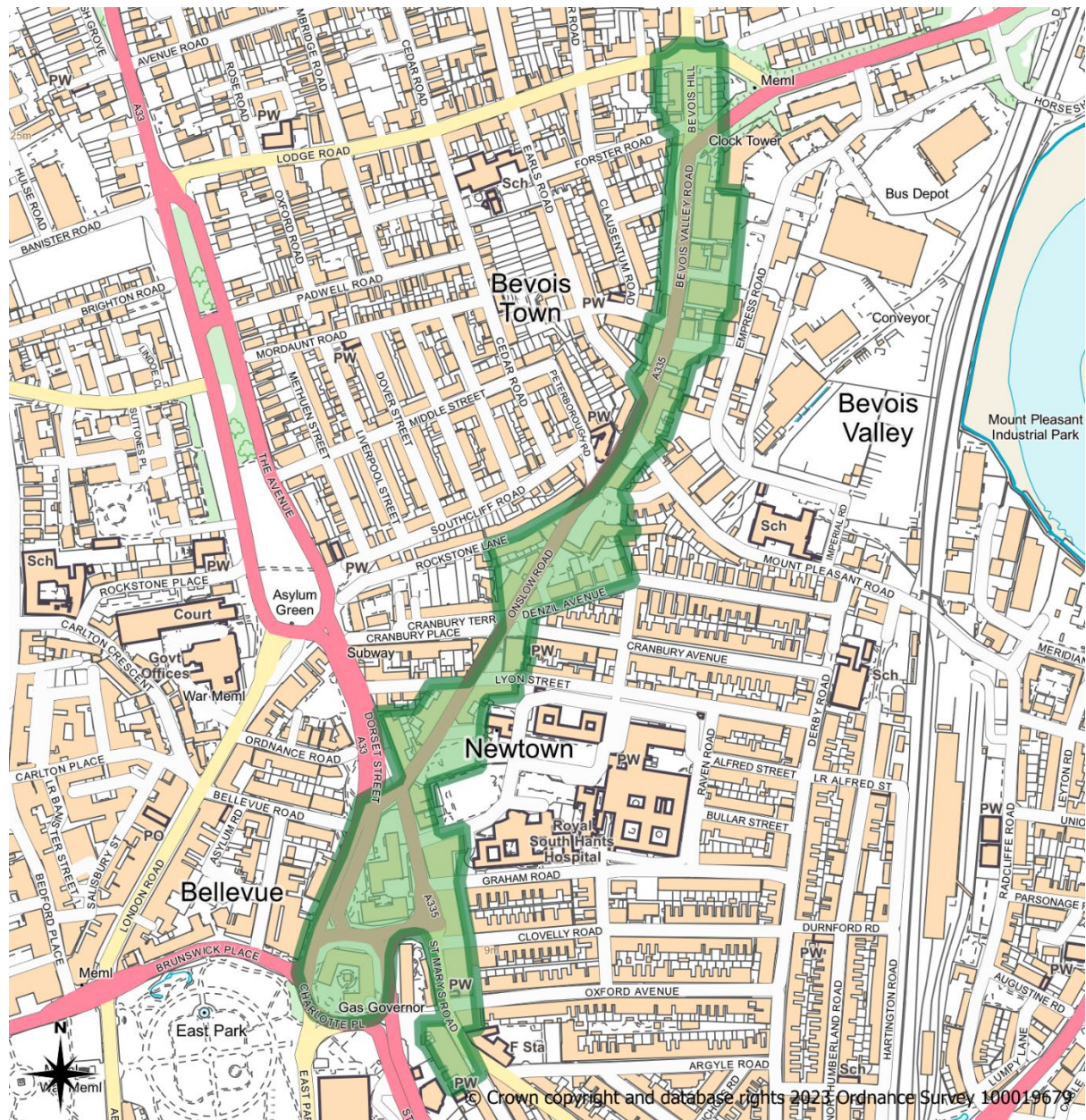
London Road/Bedford Place



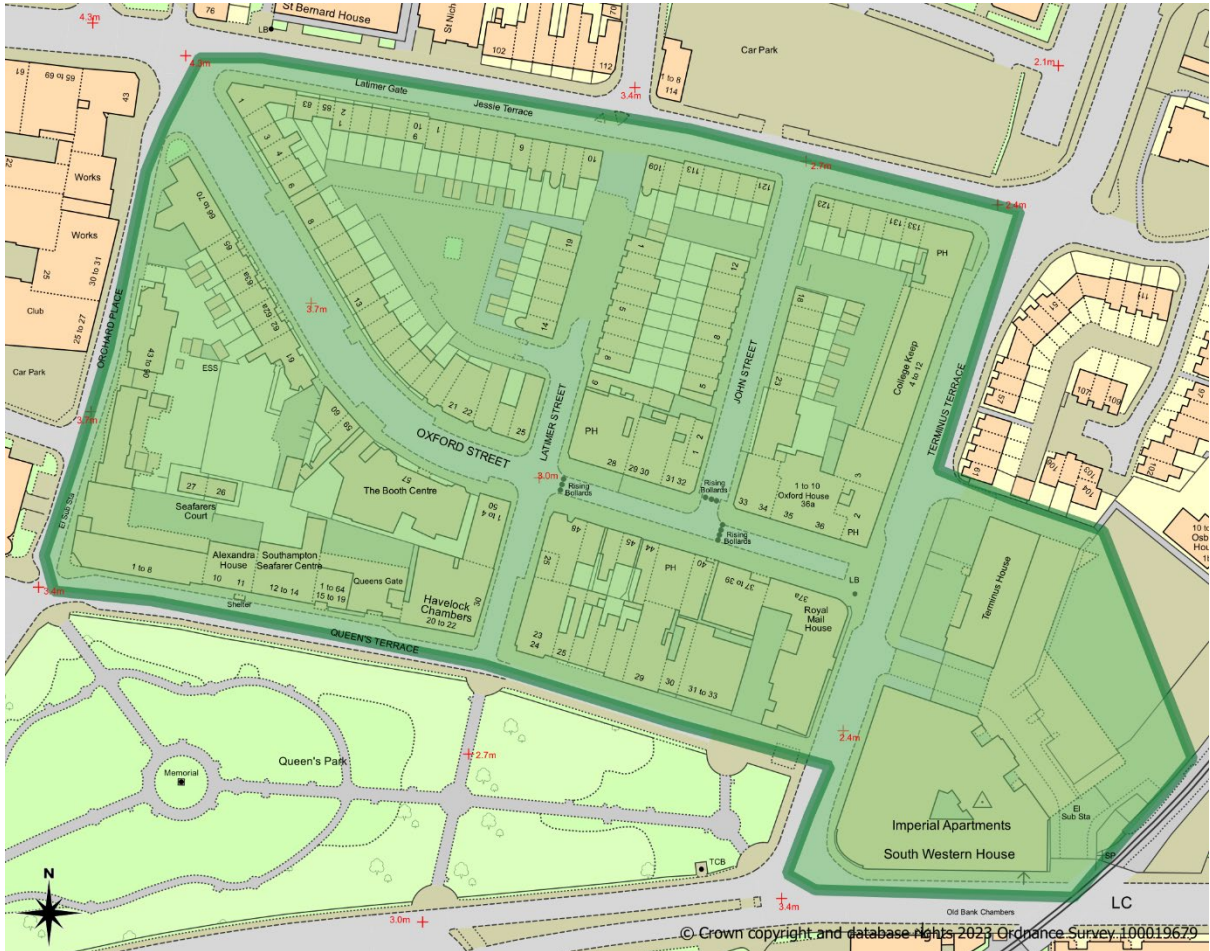
Above Bar Street



Bevois Valley



Oxford Street



The background of the slide is a photograph of a fountain at night. The fountain is illuminated with warm, golden light, creating a dramatic contrast against the dark sky. The water jets are captured in motion, appearing as a series of fine, shimmering lines. The fountain is set against a dark, textured wall, possibly made of stone or brick. The overall mood is serene and elegant.

Draft Cumulative Impact Policy Consultation

Full results summary

Data, Intelligence & Insight Team – November 2023



- [Introduction and Methodology](#)
- [Respondents](#)
- [Proposed changes](#)



Introduction and Methodology



Southampton City Council undertook public consultation on the proposed Draft Cumulative Impact Policy Consultation.

- The consultation took place between **04/09/2023 – 29/10/2023**.
- The aim of this consultation was to:
 - Hear thoughts on the proposals and any impacts or alternative suggestions to consider surrounding the update of the Section 6 – Cumulative Impact Policy (CIP), within the Statement of Licensing Policy.
- This report summarises the aims, principles, methodology and results of the public consultation. It provides a summary of the consultation responses both for the consideration of decision makers and any interested individuals and stakeholders.
- It is important to be mindful that a consultation is not a vote, it is an opportunity for stakeholders to express their views, concerns and alternatives to a proposal. This report outlines in detail the representations made during the consultation period so that decision makers can consider what has been said alongside other information.



Southampton City Council is committed to consultations of the highest standard, which are meaningful and comply with *The Gunning Principles (considered to be the legal standard for consultations)*:

1. Proposals are still at a formative stage (a final decision has not yet been made)
2. There is sufficient information put forward in the proposals to allow 'intelligent consideration'
3. There is adequate time for consideration and response
4. Conscientious consideration must be given to the consultation responses before a decision is made



New Conversations 2.0
LGA guide to engagement



Rules: The Gunning Principles

They were coined by Stephen Sedley QC in a court case in 1985 relating to a school closure consultation (R v London Borough of Brent ex parte Gunning). Prior to this, very little consideration had been given to the laws of consultation. Sedley defined that a consultation is only legitimate when these four principles are met:

- 1. proposals are still at a formative stage**
A final decision has not yet been made, or predetermined, by the decision makers
- 2. there is sufficient information to give 'intelligent consideration'**
The information provided must relate to the consultation and must be available, accessible, and easily interpretable for consultees to provide an informed response
- 3. there is adequate time for consideration and response**
There must be sufficient opportunity for consultees to participate in the consultation. There is no set timeframe for consultation,¹ despite the widely accepted twelve-week consultation period, as the length of time given for consultee to respond can vary depending on the subject and extent of impact of the consultation
- 4. 'conscientious consideration' must be given to the consultation responses before a decision is made**
Decision-makers should be able to provide evidence that they took consultation responses into account

These principles were reinforced in 2001 in the 'Coughlan Case (R v North and East Devon Health Authority ex parte Coughlan²)', which involved a health authority closure and confirmed that they applied to all consultations, and then in a Supreme Court case in 2014 (R ex parte Moseley v LB Haringey³), which endorsed the legal standing of the four principles. Since then, the Gunning Principles have formed a strong legal foundation from which the legitimacy of public consultations is assessed, and are frequently referred to as a legal basis for judicial review decisions.⁴

¹ In some local authorities, their local voluntary Compact agreement with the third sector may specify the length of time they are required to consult for. However, in many cases, the Compact is either inactive or has been cancelled so the consultation timeframe is open to debate

² BAILII, [England and Wales Court of Appeal \(Civil Decision\) Decisions](#), Accessed: 13 December 2016.

³ BAILII, [United Kingdom Supreme Court](#), Accessed: 13 December 2016

⁴ The information used to produce this document has been taken from the Law of Consultation training course provided by The Consultation Institute



- The agreed approach for this consultation was to use an online questionnaire as the main route for feedback. Questionnaires enable an appropriate amount of explanatory and supporting information to be included in a structured questionnaire, helping to ensure respondents are aware of the background and detail of the proposals.
- Respondents could also write letters or emails to provide feedback on the proposals. Emails or letters from stakeholders that contained consultation feedback were collated and analysed as a part of the overall consultation.
- The consultation was promoted in the following ways by:
 - Emails and letters will be sent out to the key stakeholders.
 - Wider City Residents – Website and SCC comms.
- All questionnaire results have been analysed and presented in graphs within this report. Respondents were given opportunities throughout the questionnaire to provide written feedback on the proposals. In addition anyone could provide feedback in letters and emails. All written responses and questionnaire comments have been read and then assigned to categories based upon similar sentiment or theme.



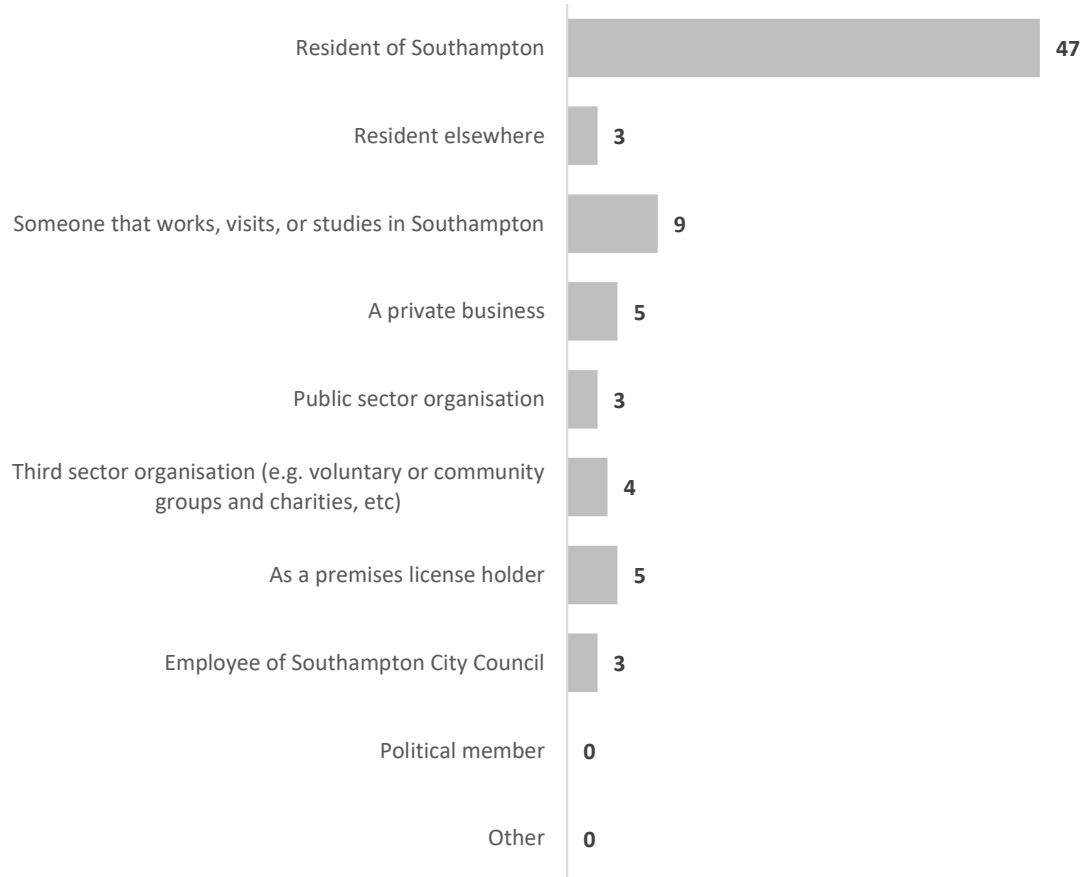
Who were the respondents?

Total respondents:

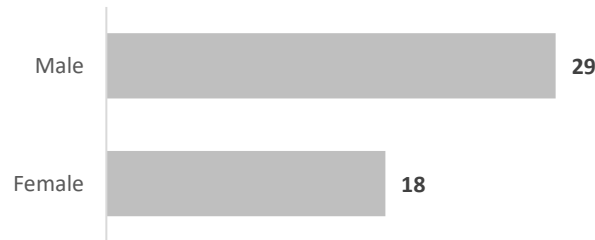
	Total number of responses
Questionnaire	54
Emails / letters	0
Total	54

The following graphs are shown in respondent count.

Interest in the consultation:



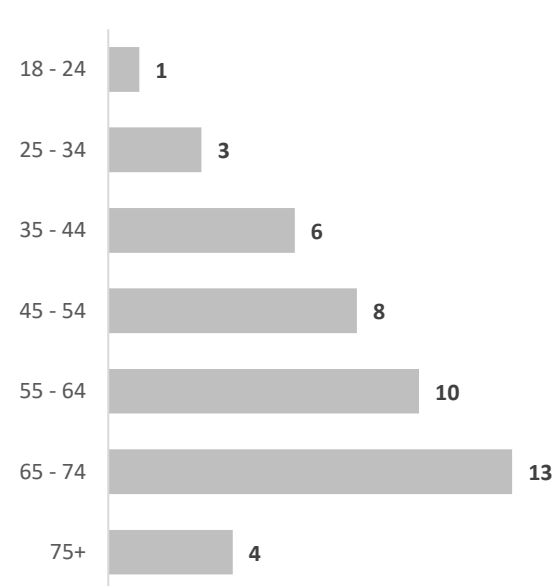
Sex:



Disability:



Age:



Ethnicity:





Proposed changes



The questionnaire outlined the following background information:

Within the Statement of Licensing Policy at Section 6 is the Cumulative Impact Policy (CIP). A CIP identifies stress areas where the density of either specific types of licensed premises or licensed premises as a whole, are causing problems.

Currently, we have three stress areas:

- London Road / Bedford Place
- Above Bar Street
- Bevois Valley

We are required to review the cumulative impact assessment every three years. The most recent data obtained from the police identified both London Road / Bedford Place and Above Bar Street still suffer from high levels of crime linked to the night-time economy. More information can be found on our website.

The data showed that Bevois Valley was not suffering from such high levels of crime and disorder, however the data from the Violence against women and girls profile showed that the area suffers from high levels of violence against women and girls.

The police data also identified Charlotte Place and Oxford Street as areas of concern to the extent it is felt these areas need to be included as stress areas.

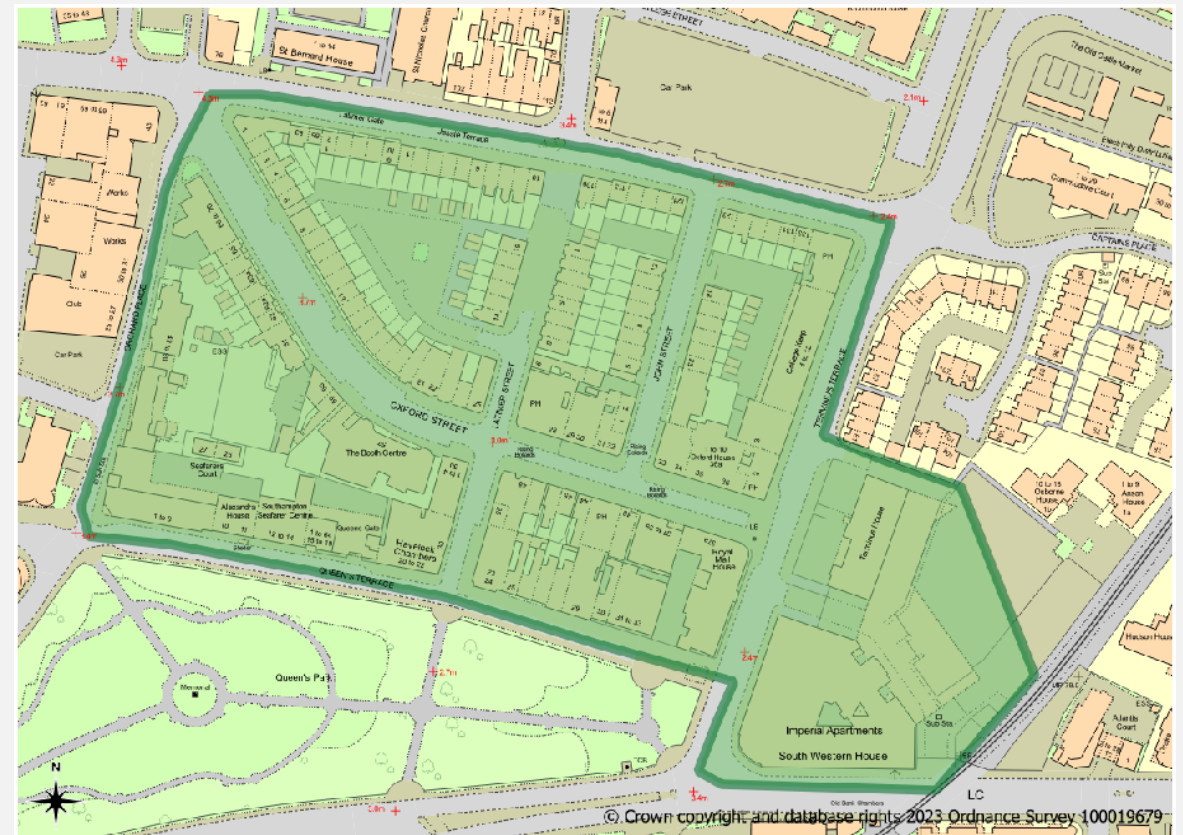


The questionnaire outlined the following proposals:

- As a result, we are proposing to extend the Bevois Valley CIP Stress Area to include Charlotte Place, which can be seen within the map below.



- We are also proposing to add Oxford Street as a 4th CIP Stress Area, which can be seen within the map below.

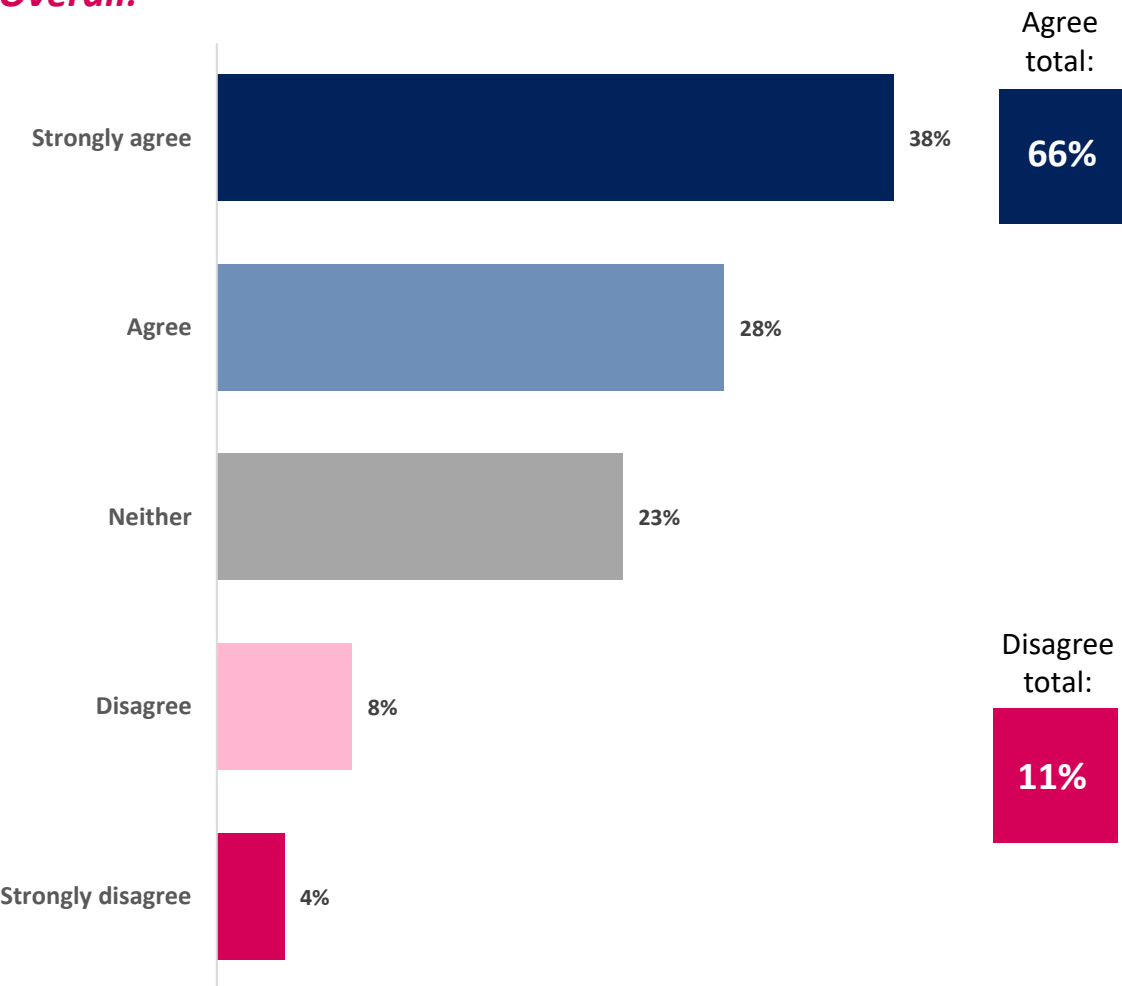




Agreement & Impact to extending Bevois Valley CIP stress area

Question: To what extent do you agree or disagree with extending the Bevois Valley CIP Stress area to include Charlotte Place?

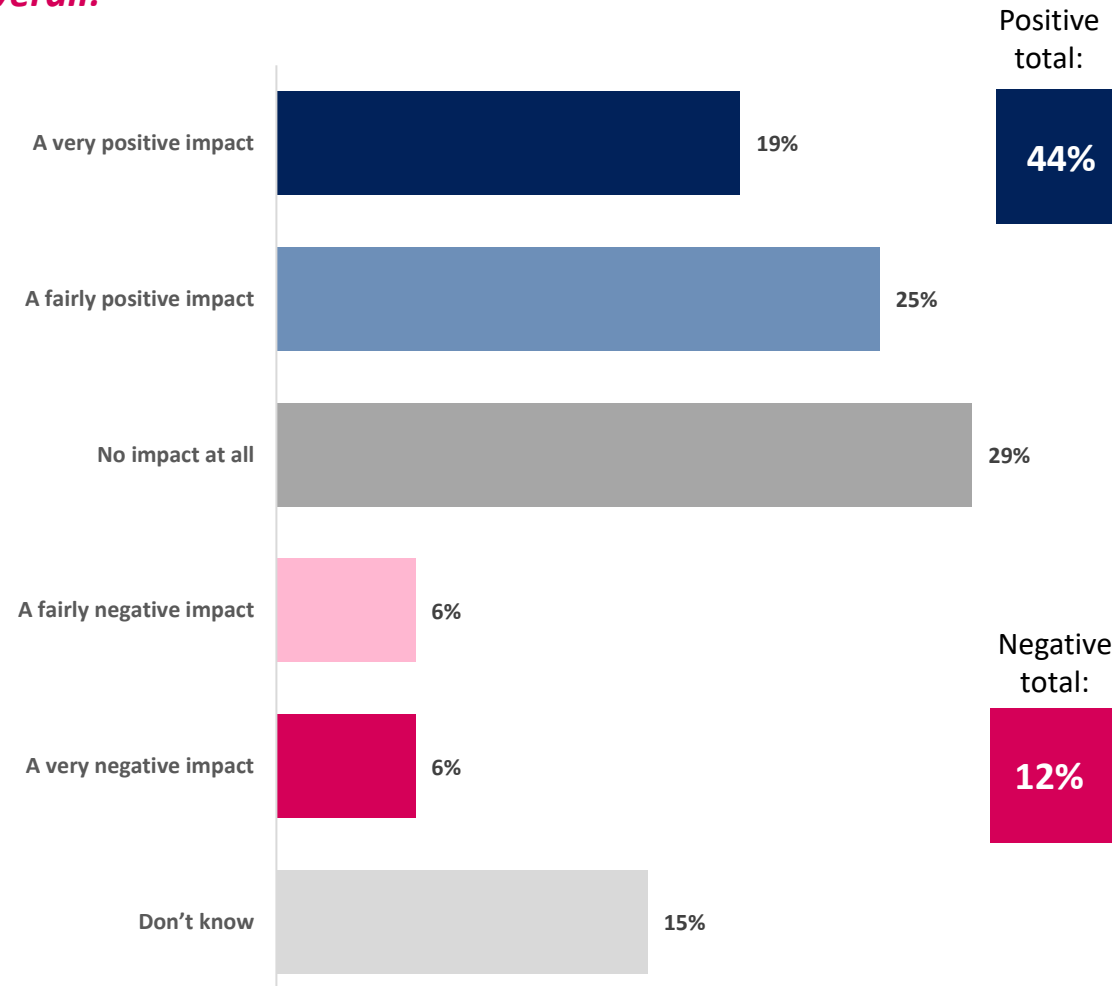
Overall:



Base respondents: 53

Question: What impact do you feel that extending the Bevois Valley CIP Stress area may have on you, your business or the wider community?

Overall:



Base respondents: 52



Free text comments on extending Bevois Valley CIP stress area

Question: If you disagree, or have any comments, impacts, suggestions or alternatives you feel we should consider, please provide details:

Comments | 8

"I agree the Charlotte Place area should be covered but by extending the London Rd Stress area. I am not sure Bevois Valley requires a stress area any longer."

"It has not been adequately explained what the effect of adding an area to CIP might be."

"The Bevois Valley CIP Stress area should be extended north into Portswood Road. There is regular late night noise, screaming and swearing, largely because of drunken students."

"Yes, I can, the whole CIP policy has not made the streets safer, in fact it makes licences and extensions even easier to obtain as applicants deny that their customers add to the street numbers. No one takes any notice of what the objectors are saying, no one believes their evidence. At least the Council had sense enough many year ago, not to allow (at Planning) any more food and uses in the Valley ,that is why there is less trouble in that area. Meanwhile in Bedford Place licences for 04.00 at regularly given out as objectors are over ruled."

"Delighted to see preventative measures expanding in the city."

"From my experience, as an objector to Licensed premises and takeaway hours extensions, the CIP in this area will be just as useless as it has been everywhere else. Objectors claims that more people at such places/ for longer times, will be Cumulative are dismissed as - what could happen- instead of - what will happen. In over 25 years I have not seen even one refusal at any hearing I have spoken at or listened to. Objectors just give up and stop writing in. That suits the applicants nicely and the Council avoids expensive appeals. But it make life hell for residents, they have to go and live elsewhere. As has happened in Polygon."

"Little experience of this area of Southampton late in the evening."

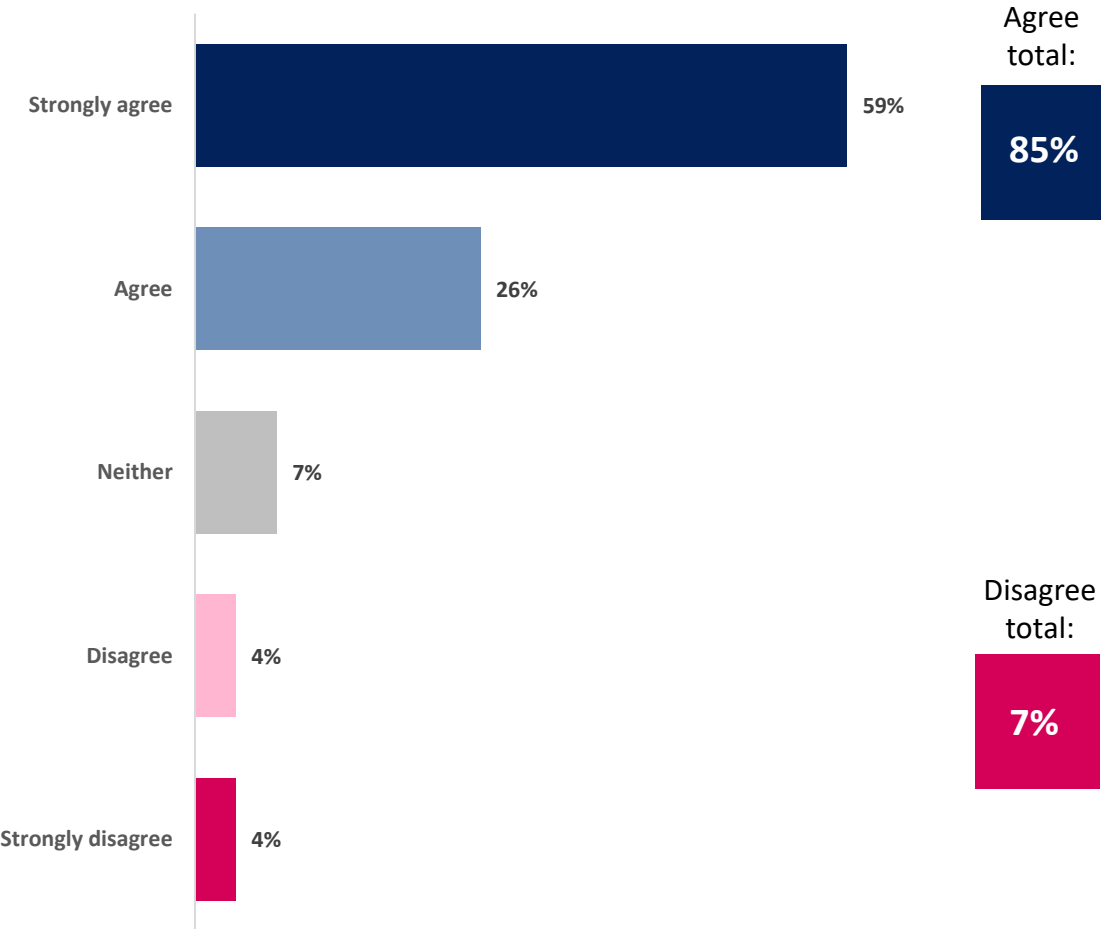
"Sack this stupid council."



Agreement & Impact with adding Oxford street as a fourth CIP stress area

Question: To what extent do you agree or disagree with adding Oxford Street as a fourth CIP Stress Area?

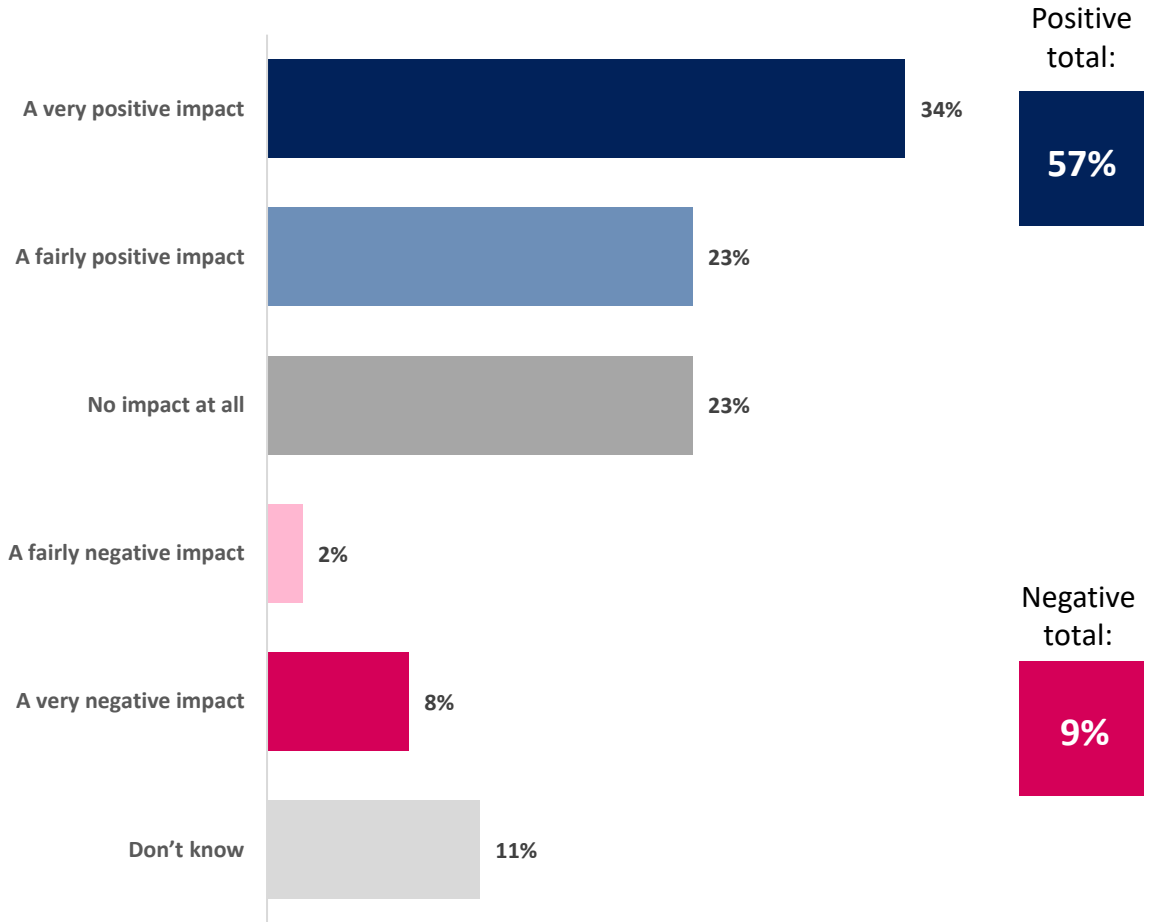
Overall:



Base respondents: 54

Question: What impact do you feel that adding Oxford Street as a fourth CIP Stress Area may have on you, your business or the wider community?

Overall:



Base respondents: 53



Question: If you disagree, or have any comments, impacts, suggestions or alternatives you feel we should consider, please provide details:

Comments | 21

"I have noticed a marked increase in noise especially at weekends. We are routinely woken between 02:00 and 02:30 on Friday and Saturday when late licence premises close. Frequent violent and aggressive arguments wake me and upset my family even through closed windows."

"We would like to put forward our views as residents living in Oxford Street While we love the vibrancy that most of the business's bring to the area, we have identified at least 2 businesses which have extended licensing hours and indiscriminate selling of alcohol until the early hours fuelling antisocial behaviour and disturbance of the peace. We have since had to object against 2 other premises extending their licensing hours (also for the playing of loud music) as we felt this would escalate the situation We have also contacted environmental health about a premises at who started playing loud music at midnight against their license We have lived here for 2 years and have officially contacted the police twice on particularly bad incidents but there have been many more, as the police are aware Another impact on our environment in Southampton is littering There is a late night off license in Bernard Street and the amount of rubbish that people throw on the floor is phenomenal We often spend Sunday morning clearing this up Could the shop be made to do something about this also Having more control over the environmental impact of some of the less ethical businesses would definitely curtail some of the disorder and crime that will occur as a result."

"I am a resident and home owner of Oxford Street and have first hand knowledge of the problems faced here on a daily basis. The main problem is the late licenses that some of the bars have and the seemingly reckless way they go about their business. Being able to stay open serving alcohol and playing loud music in a residential area till two in the morning, it is hard to fathom how they were given these licenses in the first place. After the bars have closed you then get the fighting, swearing, littering and damage to property for around another 40 minutes, by which time it's a quarter to three in the morning. The bars themselves do absolutely nothing to prevent this and pay lip service to supposedly being mindful of the area and it's permanent residents. Even on a Sunday night, one of these bars/nightclubs, stays open till midnight, meaning their clientele haven't dispersed the area till around twenty to one on Monday morning. Some of us have to work on Mondays!"

"Especially with the addition of , the area needs to be monitored better (which we all know is run by drug dealers and is laundering proceeds through these bars)."

"Oxford Street has changed somewhat over recent years and is moving away from dining more and more. This will control this to a degree and restrict the area from being flooded with bars."

"I believe the area should be extended to cover Brunswick Square due to the presence of a night club at and which is a convenience store selling alcohol until 2am on weekends which can lead to anti-social behaviour. This is only 1 additional street vs the current proposals."

"It has not been adequately explained what effect adding an area to CIP might have."

"Why the focus on violence against women? Men are more than twice as likely to be the victims of violence as women. The focus should be on reducing all violence not just that against women."

"The Licences will still be granted for new outlets and extensions and gradually objectors will give and flee the noise, crime and ASB, as has happened in Polygon where residents group have objected to licences for 50 year , to NO avail."



Question: If you disagree, or have any comments, impacts, suggestions or alternatives you feel we should consider, please provide details:

Comments | 21

"The Oxford Street area has been challenging for a long time now, I welcome any additional measures to curb its problems."

"It should prove a useful tool in helping to give this conservation area the protection it deserves and to improve quality of life for residents, revellers and visitors."

"As a resident I am concerned that a cohesive plan for Oxford Street needs to be developed and that putting the area into a Stressed criteria would be an essential element of any wider plan."

"I feel that making Oxford Street a stress area will help in making residents lives more tolerable."

"Increase the age limit . More younger people are migrating to Oxford Street and this is the problem."

"Where are funding and resources going to come from?"

"By reducing alcohol intake plus hours of consumption crime will greatly reduce."

"Yes , I can verify that the Oxford Street area is under night time economy stress as on the evening of October 4th residents were invited to go out with the police on foot patrol- to areas where we may not or do not feel safe at night. The police offered take us to Oxford Street or London Road/ Bedford Place. I chose the latter two places as I know them well. The reason that Oxford Street residents do more objecting, or more of them do it, is because the long term residents there have not fled, as it did not become a 75 per cent student ghetto, as did Polygon. So more more night time economy clubbers and take way users, night time mayhem and noise in Polygon."

"Even ignoring anti-social behaviour, the noise generated by the public eating or drinking outside at the many licensed premises in this area late at night (especially on Fridays and Saturdays) is a major problem for local residents. Licensing hours need to be reduced rather than extended in this area."

"This would have a very negative impact on the quality of the very nature of what Oxford Street is. People visit Oxford Street for the outdoor drinking experience and socialising culture that has been there for years. There is not a negative stigma around Oxford Street which has to be managed."

"A wim of this stupid incompetent council."

"As a resident in the area I have no problems with the nighttime economy and the venues in Oxford Street. It might make some of the people using these venues more aware of those residents in the area. I have seen people urinating in the street, making loud noises and parking with little respect of the parking regulations. As I say happy with the venues and making the area vibrant it would just be nice for people to be more neighbourly."



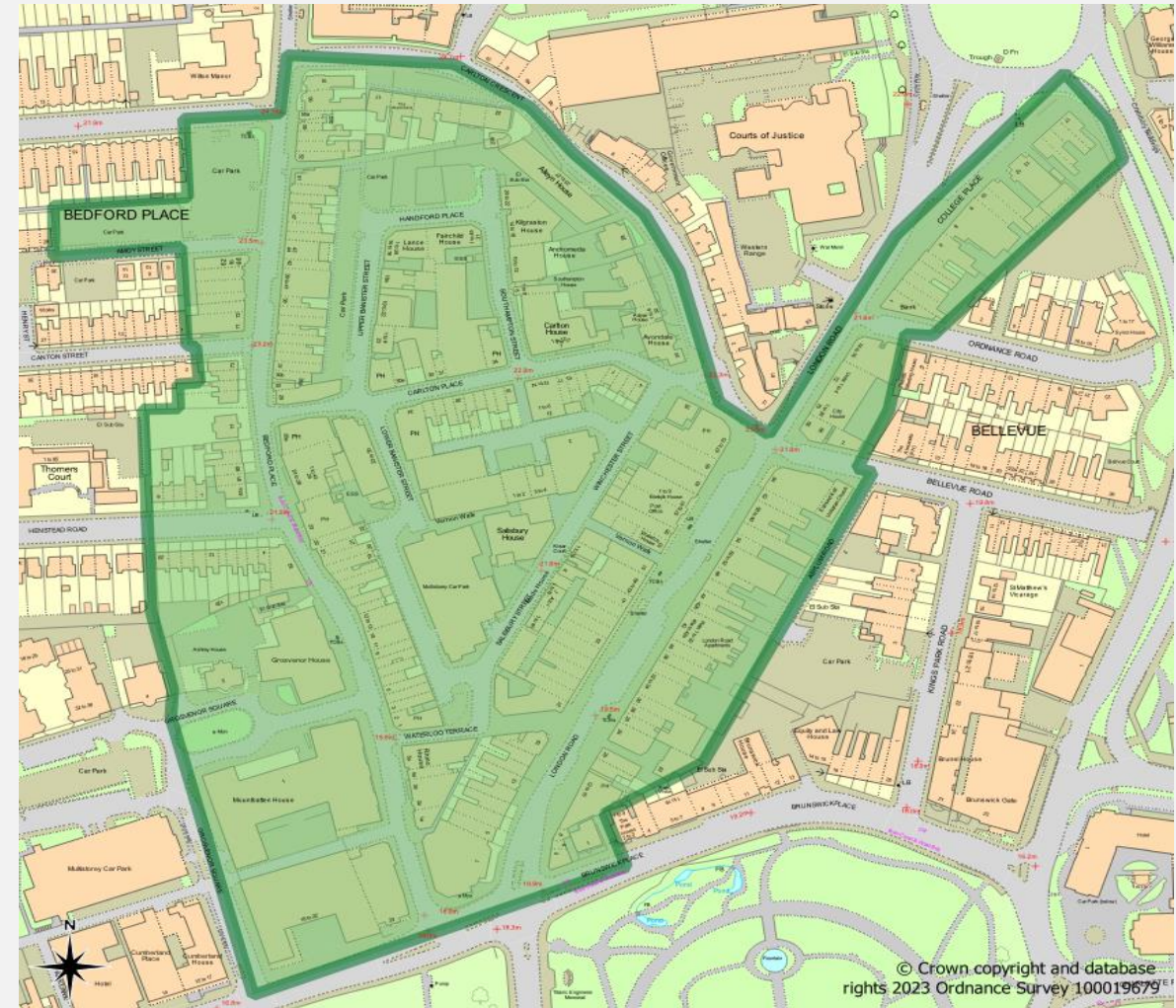
Section 6 Cumulative Impact Policy

We are proposing to keep the remainder of the Section 6 Cumulative Impact Policy the same.

This includes:

- Keeping the London Road / Bedford place CIP Stress Area the same;
- Keeping the Above Bar Street CIP Stress Area the same;
- The basic operation of the policy;
- How hearings will deal with applications within stress areas;
- How evidence of Cumulative Impact is dealt with outside of a stress area;
- How hearings will apply the CIP to applications from within or out of a stress area.

London Road / Bedford Place CIP Stress Area:

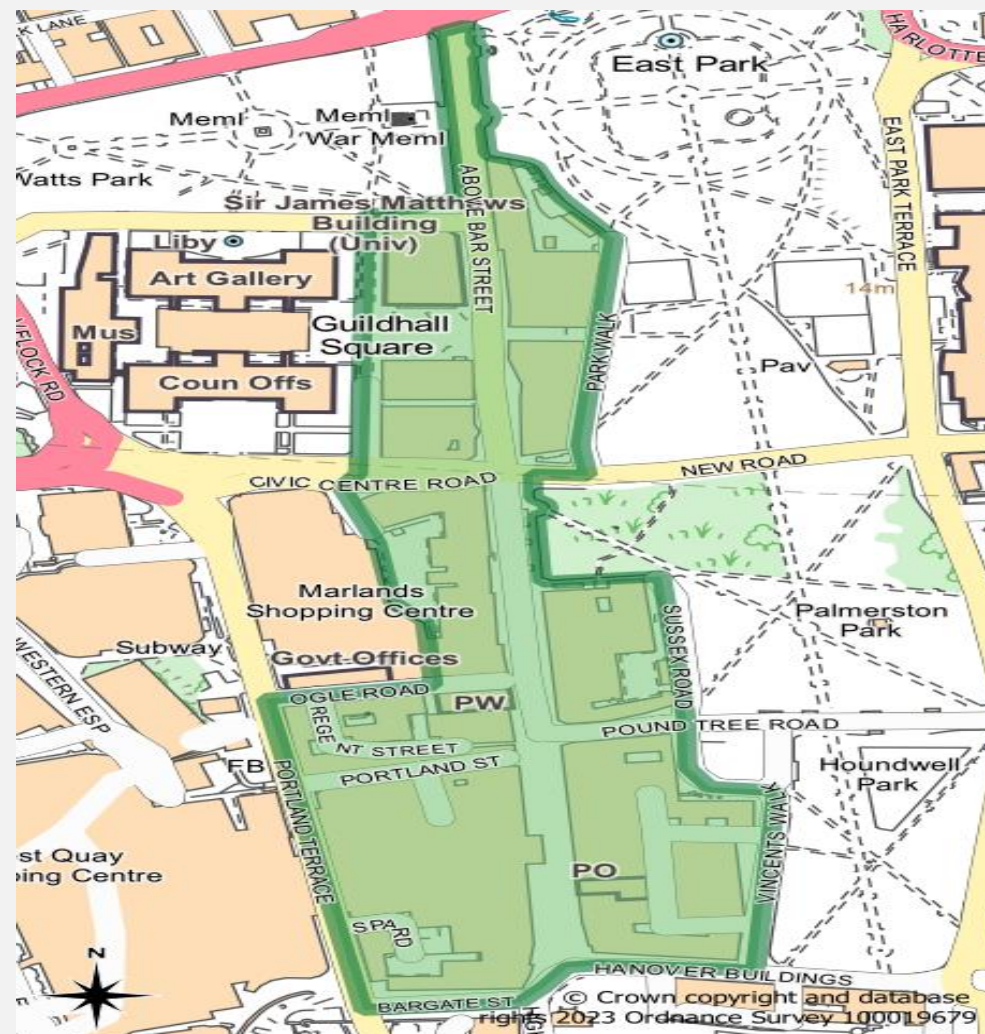




Section 6 Cumulative Impact Policy

We are proposing to keep the remainder of the Section 6 Cumulative Impact Policy the same.

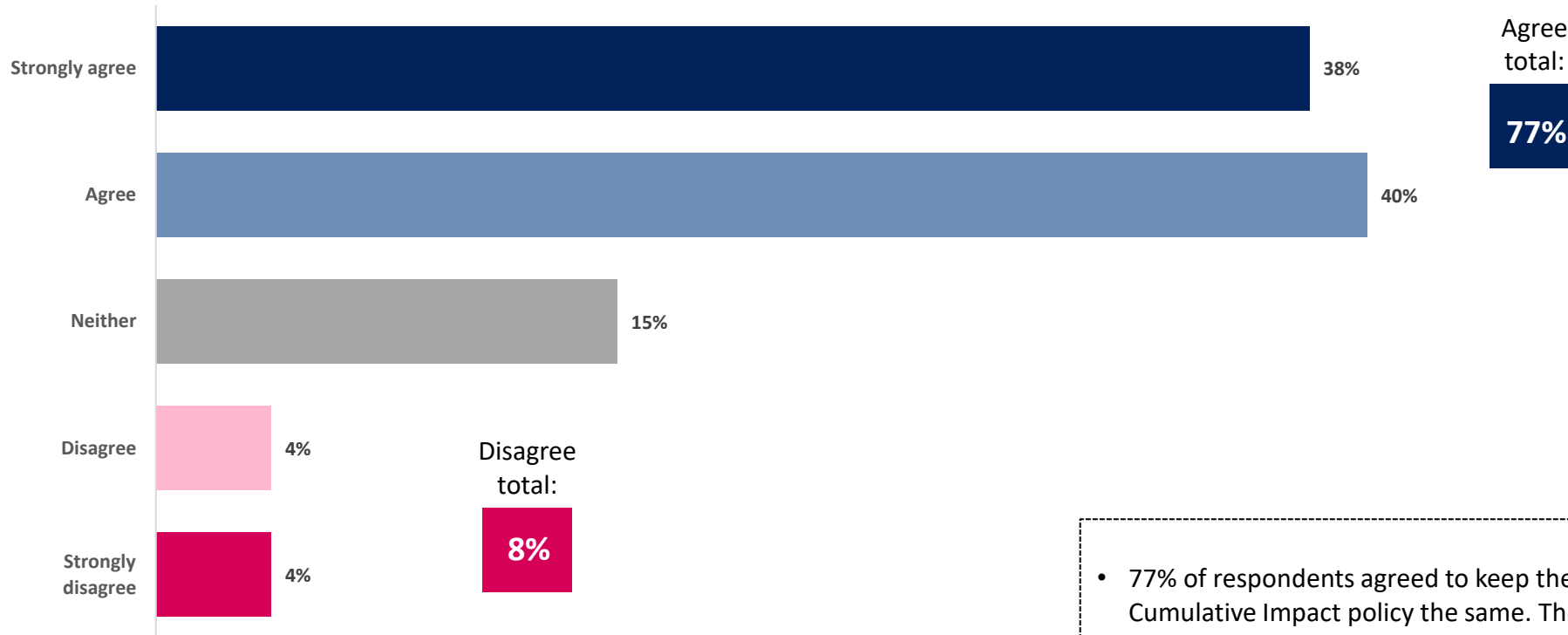
Above Bar Street CIP Stress Area:





Question: To what extent do you agree or disagree with keeping the remainder of the Section 6 Cumulative Impact Policy the same?

Overall:



- 77% of respondents agreed to keep the remainder of the Section 6 Cumulative Impact policy the same. The majority responded 'agree' (40%).
- While 8% disagreed with keeping the remainder of the Section 6 Cumulative Impact Policy the same.

Base respondents: 53



Question: If you disagree, or have any comments, impacts, suggestions or alternatives you feel we should consider, please provide details:

Comments | 9

"I think the city should keep 3 stress areas, extending the London Rd one to include Charlotte place and surround and do away with Bevois Valley."

"As I said before, why the focus on violence against women? Men are more than twice as likely to be the victims of violence as women. The focus should be on reducing all violence not just that against women."

"It is very important to keep this and I would suggest it needs extending along Henstead Road to where it meets Devonshire Rd. Residents of Henstead Rd are subjected to nightly disturbances from around 8pm to 5am. The anti social behaviour is bad enough. But add into this the fights, drug dealing, street drinking and litter and the quality of sleep is effected. Also means that residents nearby do not want to go out during the evenings as the area feels unsafe if you are not a 'clubber'."

"Useless as it has been, do keep it in place. Any alternative would be of equal value (NONE) as Council dare not refuse applicants, dread cost of an appeal."

"The Above Bar area particularly is a nightmare for residents on a Friday/Weekend night. I've been asked numerous times by female friends and colleagues to walk them to the buses because they don't like the crowds, the public drunkenness and the general air of danger, and the outdoor drinking since COVID has made it far worse. Bedford Place is also strongly recommended to be avoided at any time there is drinking going on. I understand that you need to have something in the High Street, but it looks like carnage and it scares those who are not partaking. Any measure to limit, control, or generally make it safer would be applauded."

"This areaxespecially Bedford Place is an area of high density clubs bars etc. Drinking is rife. Crime abounds whether just scuffles and street fights or more serious crimes of harrassment. Due to alcohol. Dangerous substance. Hours of consumption should NOT go over 0100hrs."

"I do support, but the CIP will remain as useless as it has always been for stopping the issue of new licences and extended hours. Objectors know that they stand little or no chance of success."

"If you have clubs open until 5 or 6 am then other places should be able to have the same option to open until the same times. It is not a fair marketplace if businesses are not allowed to have the same trading opportunities."

"This council is bonkers."

OFFICER RESPONSES TO CONSULTATION COMMENTS

Consultation comment	Officer response
<p>“I agree the Charlotte Place area should be covered but by extending the London Rd Stress area. I am not sure Bevois Valley requires a stress area any longer.”</p> <p>“I think the city should keep 3 stress areas, extending the London Rd one to include Charlotte place and surround and do away with Bevois Valley.”</p>	<p>As the proposal is to keep Bevois Valley as a stress area Charlotte place is better placed within that stress area, should Bevois Valley no longer exist as a stress area at that point Charlotte place can be included in the London Road Stress area.</p>
<p>“It has not been adequately explained what the effect of adding an area to CIP might be.”</p>	<p>The policy does explain the implications of the CIP. If there is an objection to an application the onus falls to the applicant to demonstrate the application will not adversely impact any of the licensing objectives. Normally it falls to the objector to demonstrate an adverse impact.</p>
<p>“The Bevois Valley CIP Stress area should be extended north into Portswood Road. There is regular late night noise, screaming and swearing, largely because of drunken students.”</p>	<p>The partners were asked to specifically include data for Portswood and Shirley High street in addition to the proposed stress areas. Although we accept these areas have some issues they are not to the same scale as the areas identified and it was felt there was insufficient evidence to include these areas as stress areas under the policy. This will continue to be reviewed.</p>
<p>“Yes, I can, the whole CIP policy has not made the streets safer, in fact it makes licences and extensions even easier to obtain as applicants deny that their customers add to the street numbers. No one takes any notice of what the objectors are saying, no one believes their evidence. At least the Council had sense enough many year ago, not to allow (at Planning) any more food and uses in the Valley, that is why there is less trouble in that area. Meanwhile in Bedford Place licences for 04.00 at regularly given out as objectors are over ruled”</p> <p>“The Licences will still be granted for new outlets and extensions and gradually objectors will give and flee the noise, crime and ASB, as has happened in Polygon where residents group have objected to licences for 50 year , to NO avail.”</p>	<p>The policy has been a major reason a number of venues have not applied for variations in the stress areas. Those that have applied have gone through the hearing process and each case determined on the merits of each case having considered the law and local policies.</p>
<p>“From my experience, as an objector to Licensed premises and takeaway hours extensions, the CIP in this area will be just as use less as it has been everywhere else. Objectors claims that more people at such places/ for longer times, will be Cumulative are dismissed as what could happen instead of</p>	<p>The policy has been a major reason a number of venues have not applied for variations in the stress areas. Those that have applied have gone through the hearing process and each case determined on the merits of each case having considered the law and local policies.</p>

OFFICER RESPONSES TO CONSULTATION COMMENTS

<p>what will happen. In over 25 years I have not seen even one refusal at any hearing I have spoken at or listened to. Objectors just give up and stop writing in. That suits the applicants nicely and the Council avoids expensive appeals. But it make life hell for residents, they have to go and live elsewhere. As has happened in Polygon.”</p>	
<p>“I believe the area should be extended to cover Brunswick Square due to the presence of a night club at [REDACTED] and [REDACTED] which is a convenience store selling alcohol until 2am on weekends which can lead to anti social behaviour. This is only 1 additional street vs the current proposals.”</p>	<p>There is little to no evidence of these venues contributing to the cumulative impact in Oxford Street.</p>
<p>“Why the focus on violence against women? Men are more than twice as likely to be the victims of violence as women. The focus should be on reducing all violence not just that against women.”</p> <p>“As I said before, why the focus on violence against women? Men are more than twice as likely to be the victims of violence as women. The focus should be on reducing all violence not just that against women.”</p>	<p>There is clear evidence that attitudes towards women need to be addressed, hence the focus on violence against women. This does not detract from work to reduce all violence.</p>
<p>“Increase the age limit . More younger people are migrating to Oxford Street and this is the problem.”</p>	<p>This is beyond our legal powers</p>
<p>“Where are funding and resources going to come from?”</p>	<p>There is little funding or resource required for this, it falls within the day to day work of the licensing team and their partners.</p>
<p>“Even ignoring antisocial behaviour, the noise generated by the public eating or drinking outside at the many licensed premises in this area late at night (especially on Fridays and Saturdays) is a major problem for local residents . Licensing hours need to be reduced rather than extended in this</p>	<p>I suspect the author misunderstood the purpose of the stress area. The proposal is to place greater restrictions on the area.</p>
<p>This would have a very negative impact on the quality of the very nature of what Oxford Street is. People visit Oxford Street for the outdoor drinking experience and socialising culture that has been there for years. There is not a negative stigma around Oxford Street which has to be managed.”</p>	<p>The activities in Oxford Street need to be managed carefully as it lies very close to significant numbers of residential properties. The purpose of the stress area is to allow the current vibrancy of Oxford St to exist but allows it to be managed so as not to further adversely impact on local residents.</p>
<p>“It is very important to keep this and I would suggest it needs extending along Henstead Road to where it meets Devonshire Rd. Residents of Henstead Rd are subjected to nightly disturbances from around 8pm to</p>	<p>There are no licensed premises in Henstead Road and it is a residential road. Extending the stress area to here will have no impact.</p>

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<p>5am. The anti social behaviour is bad enough. But add into this the fights, drug dealing, street drinking and litter and the quality of sleep is effected . Also means that residents nearby do not want to go out during the evenings as the area feels unsafe if you are not a 'clubber'."</p>	
<p>"If you have clubs open until 5 or 6 am then other places should be able to have the same option to open until the same times . I t is not a fair marketplace if businesses are not allowed to have the same trading opportunities."</p>	<p>Maintaining the level playing field at the cost of public safety, crime and disorder cannot be justified.</p>