



BEDFORD
BOROUGH COUNCIL



Statement of Licensing Policy

Cumulative Impact Assessment 2022

July 2022

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1. Executive Summary

1.1 Background

- 1.1.1 This cumulative impact assessment (CIA) was undertaken to support Bedford's Statement of Licensing Policy 2018-2023.
- 1.1.2 Cumulative impact is a proper matter that a licensing authority (Bedford Council in this case) can consider under the Licensing Act 2003 and its accompanying Guidance (Section 182, revised 2018). Cumulative impact is best summarised as
- An area where a concentration of licensed premises, however small in number or well managed individually, causes problems or 'cumulative impact' beyond their immediate premises. In doing so, their impact must compromise one or more of the four licensing objectives, which are: the prevention of crime and disorder, public safety, the prevention of nuisance and the protection of children from harm.*
- 1.1.3 Under the Policing and Crime Act 2017, cumulative impact policies were put on a statutory footing from 6th April 2018 (not simply as a reference in the S182 Guidance). As such, the duty to undertake a cumulative impact assessment was made a legal requirement should a licensing authority seek to introduce or retain a cumulative impact policy (CIP). The CIA must be revisited at least every three years to see if evidence shows it remains relevant.
- 1.1.4 Once introduced, a CIP introduces a rebuttal principle. This means that licence applicants must demonstrate how their application is exceptional and will not harm any of the licensing objectives.
- 1.1.5 The aim of this CIA, which uses data drawn mostly from 2018 to 2021, is to update the previous Bedford CIA and provided an evidence base for the council, after consultation, to decide:
- Whether to retain its three existing cumulative impact zones (CIZs) in the town centre (Midland Road, Tavistock Street and the High Street);
 - Whether to rescind one or more of the CIZs;
 - Whether to change their boundaries or the type of licences that the CIZs cover; or
 - Whether to add any new CIZs.

1.2 Findings – Licensed Premises

- 1.2.1 There are 598 licensed premises in the borough. Of these, a large proportion - 163 or 27% - are in Bedford Town Centre.
- 1.2.2 Of these 163 licences, 101 (or 62%) are within the three existing CIZs (Midland Road, Tavistock Street and the High Street).
- 1.2.3 The table below shows how densely clustered these licences are in the existing CIZs when compared to the town centre and the borough more generally.

Location	Number of Premises	Area (ha sq.)	Premises density (per ha)
Midland Road CIZ	21	2.7	7.8
High Street CIZ	50	8.8	5.7
Tavistock CIZ CIZ	30	6.1	4.9
CIZs Total / Average	101	17.6	5.7
Town Centre (excluding CIZs)	62	82.6	0.8
Town Centre (including CIZs)	163	100.2	1.6
Rest of Borough	435	47,359.8	0.009
Borough	598	47,460.0	0.013

- 1.2.4 The three existing CIZs have a density of licences of between 377x and 600x the borough average.

1.3 Findings – Crime & Disorder and Public Nuisance

- 1.3.1 Overall, crime and disorder and public nuisance remain concentrated in the town centre, and most intensely of all within the three CIZs.
- 1.3.2 The High Street CIZ remains the main location for sexual offences in the borough. The next largest hotspot is in Midland Road CIZ and the adjacent roads to the north of it. Tavistock Street is one of three significant but lesser sexual offences hotspots.
- 1.3.3 The High Street CIZ and Midland Road CIZ are the two main hotspots for Violence against the person, with Tavistock Street CIZ having the next highest number of crimes.
- 1.3.4 Robberies were most intense in the Midland Road CIZ. This was followed by an area of the town centre not in any of the existing CIZs (possibly linked to the presence of high numbers of shoppers as victims). These were followed by the High Street and Tavistock Street CIZs.
- 1.3.5 Public order offences are stretched across a large area of the town centre including Midland Road CIZ and the High Street CIZ. Tavistock Street CIZ is the main other hotspot for public order offences.

- 1.3.6 Criminal damage is one of the few incident types where Midland Road isn't the highest or second highest incident hotspot. It remains a hotspot but is less intense than the High Street CIZ and the town centre in-between the three CIZs. Tavistock Road CIZ is the fourth hotspot.
- 1.3.7 Alcohol-related crime is highest in The High Street CIZ by some distance, followed by Tavistock Street CIZ and Midland Road CIZ.
- 1.3.8 ASB (covering public nuisance) is highest in Tavistock Street CIZ and Midland Road CIZ. The High Street CIZ is one of three secondary hotspots within the borough.
- 1.3.9 Crime and ASB was also analysed by time of day and by day of the week. The most intense alcohol-related crime in the borough takes place from 10pm on Saturday nights through to 3am on Sunday mornings. The period from 9pm on Friday nights through to Saturday morning at 3am is the next highest concentration of alcohol-related crime.
- 1.3.10 The peak of alcohol-related ASB takes place on Friday and Saturday nights (and to a lesser extent, Sunday after 10pm). This is different to all ASB, which peaks in the afternoon and evening.

1.4 Findings – CCTV Data

- 1.4.1 CCTV camera data for two sample periods - June and July in 2020 and 2021 - was analysed for Bedford Town Centre.
- 1.4.2 Overall, there were 540 incidents Bedford town centre over the two respective 8-week sample periods, recorded by CCTV operators.
- 1.4.3 Of these 540 incidents, 313 (138 in 2020 and 175 in 2021) took place between 6pm and 6am (the night-time economy). This is 58% of all sample incidents.
- 1.4.4 Of those incidents that could be considered 'cumulative impact', there were 53 in the eight weeks during 2020 and 138 in the equivalent period in 2021.
- 1.4.5 The rise from 53 in 2020 to 138 in the same period in 2021 - when Covid restrictions and public behaviour was more relaxed - was an increase of 260%.
- 1.4.6 The location where these incidents took place were as follows: High Street CIZ (40%), Midland Road CIZ (26%), Tavistock Street (19%), Rest of Town Centre (15%).
- 1.4.7 It is important to note that the geographical disparity in the size of these areas is marked. The three CIZs make up only 18% of the town centre yet 85% of all cumulative impact related incidents sampled take place in them.

1.5 Findings – Residents’ Surveys

- 1.5.1 Analysis was undertaken of the 2018 and 2019 annual residents’ community safety and crime surveys. They are large surveys, with around 1,500 residents taking part.
- 1.5.2 Bedford residents (rural and urban) feel much safer during the day than at night, both in their neighbourhood and their town centres. However, 60% of respondents said that at night the town centre feels unsafe or very unsafe (during the day it was 13%).
- 1.5.3 The main reason given by residents for this sense of fear is the misuse of alcohol (28%). Drugs, lack of visible police, begging and the night-time economy were the next four reasons why residents felt unsafe in the town centre after dark.
- 1.5.4 30. In the survey conducted in 2020 for the Public Space Protection Order (PSPO) introduced to tackle alcohol in the town centre, 45% of residents said crime and ASB was linked to alcohol in their neighbourhood. However, in the proposed PSPO area (i.e., the town centre including the three CIZs), 75% of residents said crime and ASB in their neighbourhood was linked to alcohol.

1.6 Findings – Public Health

- 1.6.1 Overall, the public health data is too general to pinpoint exact outcomes for the three existing CIZs, but it does show that Bedford has increased from a position of below the national average on many alcohol-related negative indicators, such as hazardous drinking and hospital admissions, to around the national average in the past five years.

1.7 Conclusion

- 1.7.1 32. Overall, there is a strong association between the high-density clustering of premises in the three existing CIZ areas of the High Street, Midland Road and Tavistock Street, and the presence of much higher than borough average levels of crime and disorder and public nuisance.
- 1.7.2 There does not appear to have been any significant expansion of cumulative impact related problems beyond the three existing CIZ boundaries.
- 1.7.3 There is some indication that in 2020, when there were more restrictions on licensed premises, that the levels of crime and disorder and CCTV incidents for cumulative impact were lower in the town centre than when the town was more open in 2021.
- 1.7.4 Street drinking remains a problem, particularly in Midland Road CIZ but also in Tavistock Street CIZ and neighbouring streets and public spaces.
- 1.7.5 The Riverside development and St Cuthbert’s Street, as areas with new licenced premises, remain relatively low in terms of crime and disorder and public nuisance.
- 1.7.6 There does not appear to be any reason in this data to expand the CIZs or to modify the types of premises to which they apply.

2. Context

2.1 What is cumulative impact?

- 2.1.1 'Cumulative impact', as defined by the S182 Guidance issued under the Licensing Act 2003 (revised 2018) is best summarised as follows: an area where a concentration of licensed venues, however small in number or well managed individually, causes problems or 'cumulative impact' beyond their immediate premises. In doing so, their impact must compromise one or more of the four licensing objectives, which are: the prevention of crime and disorder, public safety, the prevention of nuisance and the protection of children from harm.
- 2.1.2 Examples of cumulative impact can be burdens on public transport, the police and cleansing teams or increases in crime or nuisance that impacts upon other public space users, deters non-users or affects residents or businesses.
- 2.1.3 The exact wording from the Section 182 Guidance (revised 2018) is shown below.

- 14.20 The concept of "Cumulative impact" has been described within this guidance and used by licensing authorities within their statements of licensing policy since the commencement of the 2003 Act. 'Cumulative impact assessments' were introduced in 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.
- 14.21 In some areas where the number, type or density of licensed premises, such as those selling alcohol or providing late night refreshment, is high or exceptional, serious problems of nuisance and disorder may arise outside or some distance from those premises. Such problems generally occur as a result of large numbers of drinkers being concentrated in an area, for example when leaving premises at peak times or when queuing at fast food outlets or for public transport.
- 14.22 Queuing in itself may lead to conflict, disorder and anti-social behaviour. Moreover, large concentrations of people may also attract criminal activities such as drug dealing, pick pocketing and street robbery. Local services such as public transport, public lavatory provision and street cleaning may not be able to meet the demand posed by such concentrations of drinkers leading to issues such as street fouling, littering, traffic and public nuisance caused by concentrations of people who cannot be effectively dispersed quickly.
- 14.23 Variable licensing hours may facilitate a more gradual dispersal of customers from premises. However, in some cases, the impact on surrounding areas of the behaviour of the customers of all premises taken together will be greater than the impact of customers of individual premises. These conditions are more likely to arise in town and city centres, but may also arise in other urban centres and the suburbs, for example on smaller high streets with high concentrations of licensed premises.

- 2.1.4 If the Council (which is also the licensing authority) is satisfied that there is cumulative impact, i.e., problems that cannot be dealt with at the individual premises level, it may introduce a cumulative impact policy (CIP) which is an area (or Cumulative Impact Policy zone) with boundaries. In this area it then becomes the applicant's responsibility to prove how their application for a new or varied licence won't impact on the licensing objectives. This is a reversal of the usual principle where a 'responsible authority', such as the council, police, fire authority etc., must prove that a new or varied licence will cause problems. It is sometimes known as the 'rebuttal presumption'.

- 2.1.5 Since 2018 it has been a requirement under the law for councils to review any cumulative impact areas at least every three years and to prepare a Cumulative Impact Assessment (CIA), i.e., evidence base, to support any retained or expanded CIP area(s). This document fulfils that purpose.

2.2 What is a cumulative impact assessment?

- 2.2.1 Below is the exact wording from the Section 182 Guidance (revised 2018) regarding the cumulative impact assessment.

- 14.24 A cumulative impact assessment (CIA) 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 specified area.
- 14.25 Section 5A of the 2003 Act sets out what a licensing authority needs to do in order to publish a CIA and review it, including the requirement to consult with the persons listed in section 5(3) of the 2003 Act. The 2003 Act does not stipulate how the CIA should be used once published, because the requirements for determining applications for new licences or variations are the same in areas with a CIA as they are elsewhere, as set out in sections 18, 35, 72 and 85 of the Act. However, any CIA published by a licensing authority must be summarised in its statement of licensing policy. Under section 5(6D) a licensing authority must also have regard to any CIA it has published when determining or revising its statement of licensing policy.
- 14.26 The CIA must include a statement saying that the licensing authority considers that the number of premises licences and/or club premises certificates in one or more parts of the area described is such that it is likely that granting further licences would be inconsistent with the authority's duty to promote the licensing objectives. As part of the publication a licensing authority must set out the evidential basis for its opinion.
- 14.27 CIAs may relate to premises licensed to carry on any licensable activity, including the sale of alcohol for consumption on or off the premises, and the provision of late night refreshment. This includes late night refreshment providers which are not licensed to sell alcohol. A CIA may relate to all premises licences and club premises certificates in the area described in the assessment or parts thereof, or only to premises of a particular kind described in the assessment. For example, it may be appropriate for the licensing authority to only include off-licences or nightclubs within the scope of its assessment. The licensing authority must make clear, when publishing its CIA, which premises types it applies to. CIAs do not apply to TENs; however it is open to the police and environmental health authority (as relevant persons) to refer to evidence published within a CIA when objecting to a TEN.
- 14.28 While the evidence underpinning the publication of a CIA should generally be suitable as the basis for a decision to refuse an application or impose conditions, it does not change the fundamental way that decisions are made under the 2003 Act. Each decision in an area subject to a CIA therefore still needs to be made on a case-by-case basis and with a view to what is appropriate for the promotion of the licensing objectives. Importantly, the publication of a CIA would not remove a licensing authority's discretion to grant applications for new licences or applications to vary existing licences, where the authority considers this to be appropriate in the light of the individual circumstances of the case.

- 2.2.2 This study was undertaken by the specialists in licensing research, MAKE Associates. MAKE developed this type of cumulative impact research and it has been used it to support licensing policy evidence for councils nationally.
- 2.2.3 MAKE remain impartial in the pursuance of the research. It is for locally elected members to decide whether to introduce a cumulative impact policy or not. This should be based on the evidence contained herein, as well as any additional local evidence, advice from officers, legal counsel and their own opinions, as well as those of residents and stakeholders after consultation.

3. Objectives

The objectives of this research were to:

- Provide a Cumulative Impact Assessment in line with the Licensing Act 2003, (updated to become a legal requirement in the Police and Crime Act 2017).
- Examine the existing CIZs in Bedford town centre to provide evidence as to whether cumulative impact still exists here or not, and if so to examine if the boundaries of the existing CIZs need to be changed.
- Examine the possibility of displacement of crime and disorder, public nuisance and public safety issues because of the CIZs introduced in the previous policy – e.g., toward St Cuthbert’s Street and the impact of the Riverside development on the licensing objectives.

4. Methodology

The methodological approach to each type of data is shown at the start of each section.

5. Findings: Licensed Premises

5.1 Background

- 5.1.1 There were 598 licenced premises in Bedford borough at the time of the research for this CIA. Duplicates, suspensions or lapsed licences have been excluded. This has been exacerbated during the Covid crisis where the rate of lapsed licences and suspensions (e.g., due to non-payment of fees) has been higher than normal.
- 5.1.2 It is worth noting that a lapsed licence does not mean that a premises is not continuing to operate as a legal but unlicensed venue (e.g., a restaurant not now serving alcohol) or seeking to operate again as a licensed venue in the future.
- 5.1.3 This licence total does not include gambling premises (unless they have an alcohol or entertainment licence, e.g., a casino). Likewise, food premises, unless they have an alcohol or entertainment licence, are not included. In the case of takeaways, these are only classed as licensed premises if they have a late-night refreshment licence (LNR) for sale of hot food between 11pm and 5am.

- 5.1.4 It is worth noting that there are many restaurants in Bedford that do offer take away hot food, but cease trading before 11pm, being either licensed or unlicensed for alcohol and / or entertainment. Whilst these do not require a licence for LNR, problems may still occur around their takeaway service.
- 5.1.5 The total number of licences also includes all off-licences but does not duplicate the on-premises licence of, for example, a pub that can offer off-sales.

5.2 Findings

5.2.1 Number and type of premises

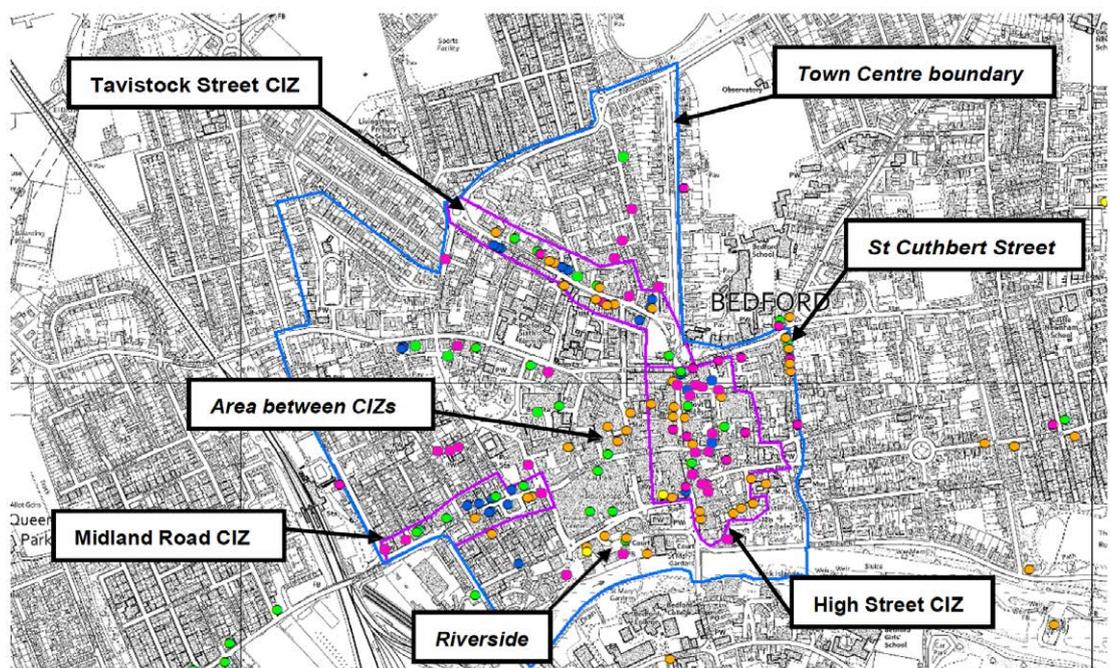
- 5.2.1.1 Of those 598 licences, 163 are within the town centre. (NB. For the purposes of this analysis, a small number of places of worship and similar have been removed, restricting the analysis to those places that routinely sell alcohol (on or off premises), as well as late night refreshment).
- 5.2.1.2 Of those 163, 101 are within the three existing CIZ areas. 62 are located within the remainder of the town centre. The table below shows how those break down by premises type within each area.

Figure 1: Number and type of premises in Bedford CIP

Premises Type	Midland Road		High Street		Tavistock Street		Town Centre (excluding CIZs)	
	No. of venues	% of total	No. of venues	% of total	No. of venues	% of total	No. of venues	% of total
Licensed Retail	7	33%	7	14%	4	13%	17	27%
Restaurant	3	14%	19	38%	15	50%	21	34%
Late Night Refreshment	8	38%	3	6%	8	27%	4	6%
Pub / Bar / Nightclub	3	14%	20	40%	3	10%	19	31%
Arts Venue	0	0%	1	2%	0	0%	1	2%
Total	21	100%	50	100%	30	100%	62	100%

- 5.2.1.3 The composition of each CIZ is broadly reflective of the challenges each faces. For example, off-licences make up 33% of the premises in Midland Road which is known for its street drinking problems. There are also high levels of late-night refreshment venues here (38%). There are relatively few of the other types of venue.
- 5.2.1.4 The High Street, which contains the town's main night-time economy (and the night-time and late-night crime and disorder and public nuisance associated with it), has 40% of its venues operating as pubs, bars and nightclubs. The area has seen a fall in the number of late-night refreshment premises (for example the closure of the two Subways here) but a rise in restaurants (now almost 40% of the premises).

- 5.2.1.5 Given the high number of crimes that still take place in the High Street (see Crime and Disorder chapter), it suggests that, despite the fall in late night operations here since 2018, there are still issues associated with some customers of large-format vertical drinking premises with very late-night licences (e.g., 4am or 5am) located here.
- 5.2.1.6 Tavistock Street is the least affected of the CIZs by crime and disorder, albeit there has been a spike in antisocial behaviour and public nuisance here and it remains a problematic area, as the Crime and Disorder and CCTV chapters show. Here, in addition to the large number of restaurants, which generally close early, 40% of the licences are for LNR and off-licences, some of which are open very late.
- 5.2.1.7 Below is a map showing licensed premises within the town centre and the three CIZs with their hinterlands for context.¹



- 5.2.1.8 The map makes immediately apparent the large number of premises within the existing CIZs, and the boundaries provide a natural fit with those premises. Outside of the CIZs, and to a lesser degree, the town centre, the number and density of premises drops off rapidly.
- 5.2.1.9 Most of Bedford town centre's licensed premises are within three clusters. These correspond to the three existing CIZs.
- 5.2.1.10 There are three other smaller clusters within the town centre. The first is the area between the three existing CIZs. This comprises mainly of licensed cafes and shops providing off-sales.

1. Because of the density of premises in the CIZs, some indicators are 'stacked' on top of each. This is due to the way they are rendered by the mapping software

2. Blue dots = Late Night Refreshment, Pink dots = Pubs, Bars & Nightclubs, Green dots = Licensed Retail, Orange dots = Restaurants, Yellow dots = Arts Venues

5.2.1.11 The two other areas of licensed premises density are an emerging cluster of restaurants and cafes around St Cuthbert's Street, and the Riverside development - which at the time of the last CIA had only just opened. These three smaller clusters of venues, do not appear to be connected to any notable corresponding rise in crime and disorder or public nuisance since the last CIA.

5.2.2 Comparative premises density

5.2.2.1 To understand premises density across the borough vs the three existing cumulative impact zones, the size of each area was measured and factored against the number of premises within that footprint.

Figure 3: Comparative premises density

Location	Number of Premises	Area (ha sq.)	Premises density (per ha)
Midland Road CIZ	21	2.7	7.8
High Street CIZ	50	8.8	5.7
Tavistock CIZ CIZ	30	6.1	4.9
CIZs Total / Average	101	17.6	5.7
Town Centre (excluding CIZs)	62	82.6	0.8
Town Centre (including CIZs)	163	100.2	1.6
Rest of Borough	435	47,359.8	0.009
Borough	598	47,460.0	0.013

5.2.2.2 The densities of premises per hectare are hugely different within the CIP zones relative to the town centre and even more so relative to the entire borough.

5.2.2.3 Even within the CIZs themselves there are variations, such as Midland Road, which despite its lower number of premises has a density of licensed premises considerably higher than that of the other two CIZs, which is due to it being a small area.

5.2.2.4 The borough premises density is 0.013 licences per ha². This density is similar to the area outside of the town centre because the borough is largely rural - 0.009 licences per ha².

5.2.2.5 Midland Road CIZ area has 600x the density of licensed premises per hectare relative to the borough average.

5.2.2.6 The High Street CIZ has 438x the density of licensed premises per hectare relative to the borough average.

5.2.2.7 Tavistock Street CIZ has 377x the density of licensed premises per hectare relative to the borough average.

5.2.2.8 The town centre (outside of the CIZs) has 62x the density of licensed premises per hectare relative to the borough average.

5.2.2.9 Licence density alone is not the only indicator of cumulative impact, but it is a pre-requisite.

5.2.3 New, suspended, withdrawn, lapsed and rescinded licences

- 5.2.3.1 Over the past three years there have been numerous licence changes, this is particularly the case during Covid when several licences have lapsed, or venues closed.
- 5.2.3.2 It is also worth noting that whilst there may be licences issued, that does not mean a venue is open and operating. In some cases, licences were issued to venues that were yet to open and due to the financial challenges of Covid, the operator's plans changed, and a venue remains empty.

5.2.4 Licence reviews

- 5.2.4.1 Since the 2017 CIA there have been a small number of licence reviews in the borough.
- 5.2.4.2 In 2018, there were four licence reviews. Only one of these was in any of the CIZs: Midland Road CIZ (for off sales). The other three were outside of CIZs.
- 5.2.4.3 In 2019, there was another review of a premise in Midland Road CIZ (off sales).
- 5.2.4.4 In 2020 there were no reviews.
- 5.2.4.5 In 2021 there were two reviews at the time of CIA preparation: one premise in Midland Road CIZ (off sales) and one outside the CIZs.
- 5.2.4.6 Some of these reviewed venues continued without selling alcohol and other were forced to close.

5.2.5 Surrendered or lapsed licences

- 5.2.5.1 The number of premises licences surrendered since the last CIA is 39. Two of these were late night refreshment in Midland Road CIZ and one was for on-sales in the High Street CIZ. The other 36 were outside the CIZs.

5.2.6 New licences

- 5.2.6.1 Since the 2017 CIA some new premises licences have been granted (NB. not all of these are for entirely new premises -some may be for longer hours or extensions):
- In 2018 13 new licences were issued in the borough. This included one for on- sales in the High Street CIZ and 12 outside of the CIZs.
 - In 2019 14 new licences were issued in the borough. Three were for on-sales in High Street zone and 11 were outside the CIZs.

- In 2020 33 new licences were issued in the borough. One was for on-sales in High Street CIZ, one was for off-sales in Tavistock St CIZ. The other 31 were outside of the CIZs.
- In 2021 at the time of the CIA, 14 new licences had been issued. Two of these were in the High St CIZ. The remaining 12 were outside of the CIZs.

5.2.6.2 Overall, there have been 74 licences issue in the borough in the last three years.

5.2.6.3 Of these 74, there have been eight licences issued within the CIZs. A number have also been refused as they were contrary to policy or compromises on hours, conditions etc. could not be agreed between the applicant and the council.

5.2.6.4 This means that 66 licences were issued outside the CIZs. This shows that despite the desirability of the town centre to new applicants, the council will only approve licences within the CIZs in exceptional circumstances which it believes will not compromise the licensing objectives by adding to cumulative impact.

5.2.6.5 Overall, despite the eight new licences within the CIZs, the number of licence reviews combined with those venues that have closed or surrendered their licences, means that the number of premises within the CIZs remains broadly steady.

6. Findings: Observational Fieldwork

6.1 Background

- 6.1.1 Due to Covid-19 restrictions during the research period, it was not possible undertake observational fieldwork to catalogue incidents over a series of representative nights (usually this would be around 12 to 18 days / nights). It is recommended that this is repeated for the next CIA.
- 6.1.2 However, site visits were made on two weekend days / nights on July 9th and 10th, 2021 when the town was returning to normality post-Covid lockdowns. The purpose was for the researchers to make broad comparisons to the 2017 CIA, to understand how the town now works in terms of passenger flow, licensed venue clustering, urban design, CCTV coverage and residential proximity.
- 6.1.3 The same researcher who undertook the observation study in 2017 re-visited the town.

6.2 Findings

6.2.1 Context

- 6.2.1.1 Overall, the town centre was less busy than in 2017 at night, but the daytime and evenings remained busy, reflecting the complex path towards a return to normal.

6.2.2 The CIZs

- 6.2.2.1 Midland Road CIZ remains the main area for street drinking in the town. Street drinkers were observed here both individual and in groups and then moving down onto the Riverside once they have purchased alcohol from some of the licensed outlets on the streets. This reflects the crime and disorder and CCTV data elsewhere in the report.



- 6.2.2.2 The High Street CIZ remains the hub of the town's night-time economy but has clearly changed in composition and dynamic. There has been the closure of some nightlife venues and late-night refreshment licences, and, alongside this, the closure of some retail makes the area feel less lively both day and night.



- 6.2.2.3 Previously, this was a site of considerable night-time and late-night disorder in 2017. The CCTV incident recording and crime hotspot mapping suggests this remains the case in 2019/2020/2021. However, in terms of footfall, the area appears less busy late at night – 2am to 5am than previous years and the number of violent and alcohol-related incidents witnessed by the observer appeared lower than an equivalent previous weekend from the 2017 study. This may be because at the time of the 2021 observations, the late-night venues on the High Street and Mill Street were closing at least one hour earlier than previously (when the night-time economy was still dispersing at 5am).

- 6.2.2.4 The increase in the number of quality restaurants in the High Street and adjacent lanes and streets has started to change the atmosphere and clientele in this area with more diners and families frequenting it than in 2017. This is a positive change for an area that has traditionally been dominated by vertical drinking and late-night refreshment venues.



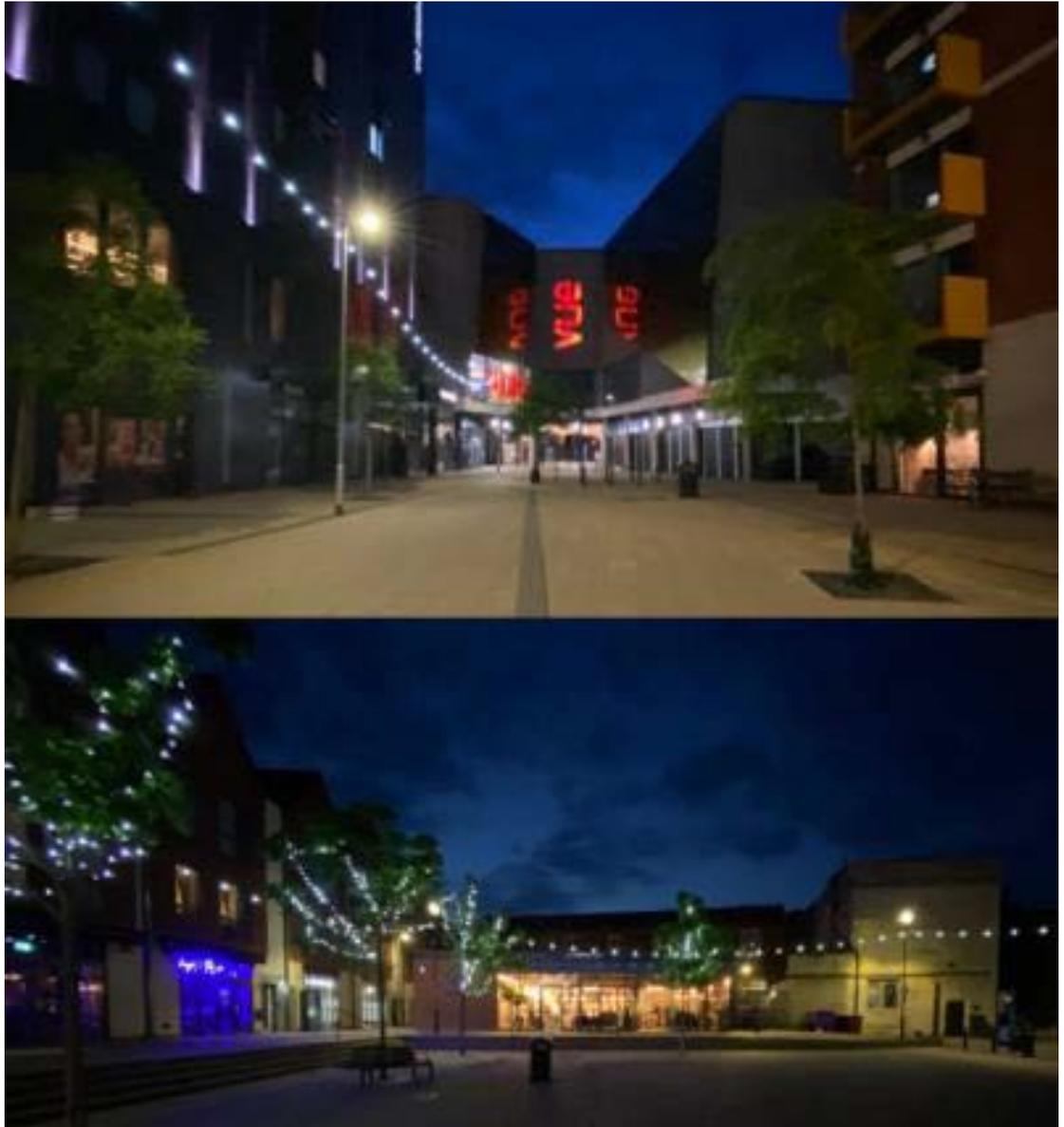
- 6.2.2.5 Tavistock Street CIZ feels less safe than in 2017 with more street drinkers and an edgier feel to it. Albeit this is purely a qualitative observation and cannot be quantified without the full observation programme, it does appear that there are more groups hanging about outside the off- licences on the street than in 2017. Clear intimidation of some users of the off- licences here by aggressive beggars was observed.



- 6.2.2.6 The Broadway area of the Tavistock Street CIZ remains a hub for street drinkers and street drinking litter.

6.2.3 Other areas of the town centre

6.2.3.1 The Riverside development has become considerably busier since the 2017 assessment. At the last CIA only around half of the units were open. It is now almost completely open and despite the pandemic it has become a lively place. The type of customer observed here is very much food- oriented. There did not appear to be any significant issues with the management of these venues, their customers, or the public space outside the venues.



- 6.2.3.2 St Cuthbert's Street, on the eastern periphery of the town centre, has matured into a new destination over the past three years with a mix of restaurants, wine bars and cafes. It will be worth keeping a watching brief on this area as it changes but whilst a small number of venues were boisterous during the observation, there was no ASB or crime witnessed here.



- 6.2.3.3 The centre of the town – the area between the three existing CIZs – has suffered from the closure of many shops and is less appealing at night when there are few restaurants or other venues open here to bring natural surveillance and footfall. However, on Saturday daytime, footfall remained high. The area is a hotspot for shoplifting which affects the 'all recorded crime' figures. Because the area is almost empty at night, with several benches and alleyways, it does attract street drinkers. In turn this creates a further sense of unease and likely affects feelings public safety.



7. Findings: Crime & Disorder and Public Nuisance

7.1 7.1 Background

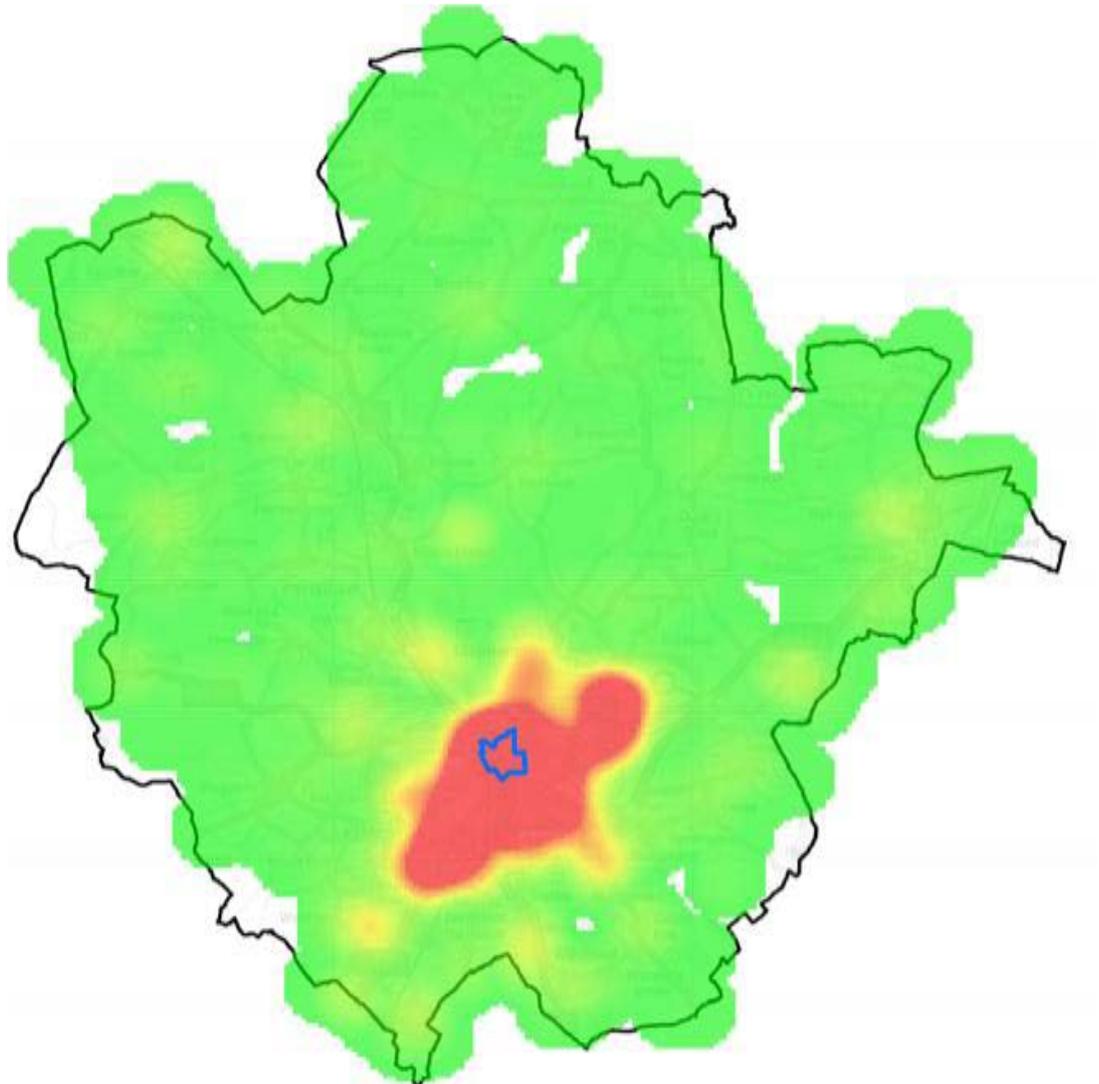
- 7.1.1 The borough crime analyst re-produced maps as closely as possible to those used in 2017 CIA.
- 7.1.2 The maps shown below have the existing boundaries of the three CIZs on them.
- 7.1.3 Bedford Prison has been labelled on most maps as it often provides its own crime hotspot, and this should be disregarded in the analysis of the town.
- 7.1.4 All crime and disorder and ASB / public nuisance categories that are commonly associated with the night-time economy, licenced venues, street drinking and alcohol consumption are used, albeit it is important to note that not all crimes within these hotspots are related to the cumulative impact of users of licensed premises.
- 7.1.5 The following two subsections are divided into hotspot mapping that provide the location and intensity of the incidents and then data clocks which allow us to see how the crimes are distributed by hour of the day and by day of the week.
- 7.1.6 The data is broken down as follows:
- All recorded crime (for context)
 - Sexual offences
 - Violence against the person
 - Robberies
 - Public order
 - Criminal Damage
 - Anti-social behaviour.

7.2 7.2 Findings

7.2.1 Hotspot mapping

- 7.2.1.1 To provide context of how concentrated crime in Bedford Borough is within the town itself and the town centre, the following map was generated.
- 7.2.1.2 The town centre is shown inside the blue boundary. For the purposes of this research, the Street Drinking PSPO boundary is used as a proxy for the town centre. The red areas are those of the highest crime, followed by yellow and then green and no crime in the white areas.

Figure 4: ALL RECORDED CRIME overlaid with location and type of premises
April 2019 to March 2021³



- 7.2.1.3 It is important to note intensity of all recorded crime incidents is not the same across the red hotspot. There are in fact major variations within this red area, which subsequent maps show. However, the three colours are used to show how low, in relative terms, crime is across most of the borough.
- 7.2.1.4 Most crime therefore takes place in the town centre and to a lesser extent the town itself - which spatially is shaped along a southwest (e.g., Wootton) to northeast (e.g., Mowsbury) axis. There are a few small yellow areas of raised crime in the rural parts of the borough.
- 7.2.1.5 The following maps show all crime, and then the varying constituent crimes, at a much more detailed level. Whereas in the previous map, all the area shown below was red, the scale for the following maps has been adjusted so that, relative to the borough, green becomes moderate incidents, yellow is now high incidents and red the highest concentrations of incidents.

3. Note. In all mapping there are several licence markers which sit on top of others given there maybe multiple licences within the same building or adjacent buildings.

Additional contextual analysis added post-consultation.

7.2.1.6 Before proceeding to analyse the hotspot mapping, additional tables have been added - post-consultation – showing relative density of crimes per unit of land area (kilometre squared) within the borough, PSPO / town centre and the three existing CIP areas.

Figure 5: Crime and ASB types by density per square kilometre between April 2019 to March 2021

Category	Bedford Borough Incidents / km ²	PSPO Area Incidents / km ²	Tavistock CIP Incidents / km ²	Midland Incidents / km ²	High Street Incidents / km ²
All Crime	0.064	5.71	8.40	11.79	11.57
Alcohol Related Crime	0.002	0.27	0.65	0.67	1.05
All ASB	0.016	1.61	4.92	4.38	2.17
Alcohol Related ASB	0.001	0.34	1.64	1.75	0.47
Violence Against Person	0.020	1.92	2.77	4.07	3.61
Most Serious Violence	0.000	0.05	0.09	0.21	0.08
Public Order Offences	0.006	0.63	1.06	2.20	1.14
Robberies	0.001	0.13	0.26	0.67	0.26
Sexual Offences	0.002	0.12	0.10	0.18	0.25
Criminal Damage	0.006	0.43	0.63	1.13	0.72

7.2.1.7 Overall, the density of crime and ASB of all relevant types is low across Bedford Borough. (NB. This Borough figure includes the town centre and CIP areas and would be significantly lower still if these were excluded to show only suburban and rural parts of the borough).

7.2.1.8 At borough level, all incident types, from Alcohol Related Crime to Criminal Damage, are, at most, 0.02 incidents per square kilometre over two years. Most are much lower. For example, Most Serious Violence is virtually non-existent when considered across the whole borough.

7.2.1.9 The PSPO / town centre area (the blue boundary in the previous map), represents a tiny percentage (0.21%) of the entire borough land area. However, in terms of overall crime and ASB here the rates are disproportionately much higher. Within the PSPO boundary, the CIP areas (where most licensed premises are located) are, except for Sexual Offences in Tavistock Street CIP, all significantly higher than the PSPO average.

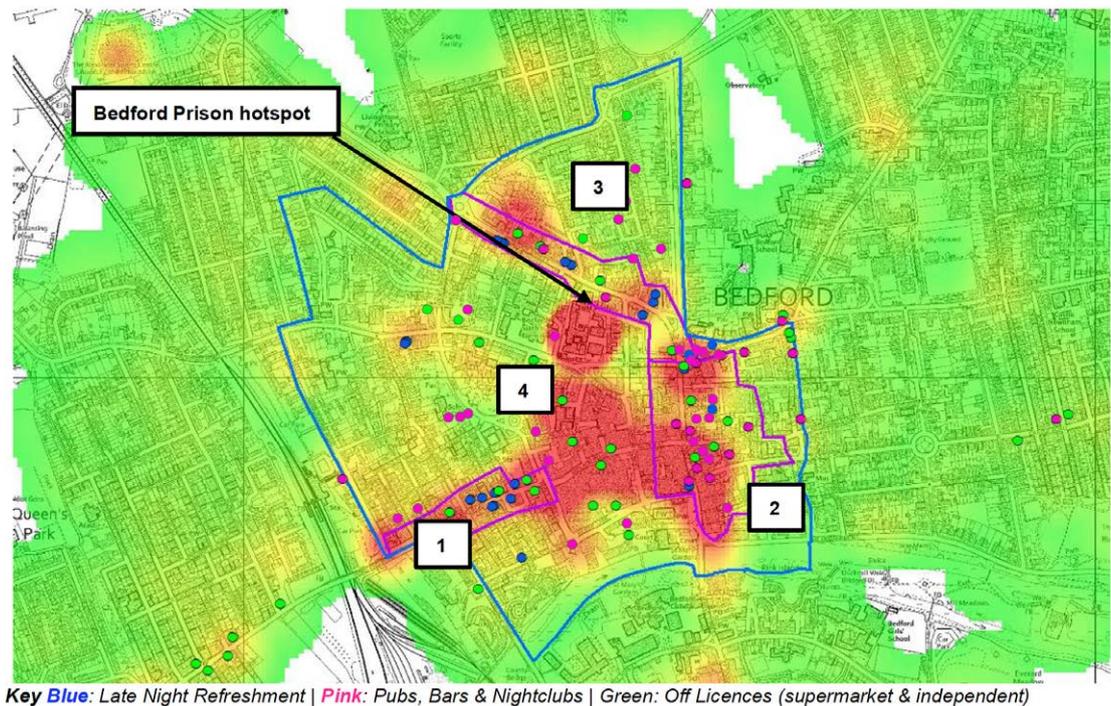
7.2.1.10 The figure below shows the multiples of borough incidents that occurred per square kilometre over the past two years in the PSPO and three CIP areas, i.e., alcohol-related crime was 165x the borough average per square kilometre in the PSPO area.

Figure 6 Crime and ASB rates in the PSPO / Town Centre and CIPs relative to the borough (April 2019 to March 2021)

Category	Bedford Borough Incidents / km ²	PSPO Area X Borough Rate	Tavistock CIP X Borough Rate	Midland X Borough Rate	High Street X Borough Rate
All Crime	0.064	90	132	185	182
Alcohol Related Crime	0.002	165	391	406	631
All ASB	0.016	102	311	277	137
Alcohol Related ASB	0.001	258	1,253	1,334	363
Violence Against Person	0.020	94	135	199	176
Most Serious Violence	0.000	157	266	667	235
Public Order Offences	0.006	101	170	354	184
Robberies	0.001	174	332	872	335
Sexual Offences	0.002	67	59	106	143
Criminal Damage	0.006	70	103	185	118

- 7.2.1.11 Overall, all crime and ASB types are many multiples higher in the PSPO area and the CIPs than the borough average - per square kilometre.
- 7.2.1.12 The multiples within the PSPO boundary range from between 67 and 258 x the borough average.
- 7.2.1.13 In terms of recorded offences within the three existing CIPs, Midland Road probably suffers slightly more than the other two CIPs in relative terms. The High Street CIP is arguably the least affected of the CIPs. However, this may be because this is the area of the night-time economy and for around half of the data period (April 2019 to March 2021) the night-time economy was shuttered or heavily restricted due to Covid 19. This is assumptive not evidence of causation. However, even given these partial closures of the NTE, the density of incidents here is higher than the PSPO as a whole. Alcohol-Related Crime density is the highest of the three CIPs in the High Street.
- 7.2.1.14 Alcohol-related ASB density is the incident type that has the greatest multiple of the borough average per square kilometre. This is considerably higher in Tavistock Street CIP and Midland Road CIP than the High Street CIP. This may be because these first two CIPs are where the most off-licences are located. But this is assumptive not evidence of causation.
- 7.2.1.15 Within the two CIPs with the two with the most off-licences (Midland Road and Tavistock Street) the ratio of Alcohol-Related ASB relative to All ASB is higher than is found in the PSPO generally.
- 7.2.1.16 In the PSPO the ratio between these two ASB types is 2.5x (i.e., 258 for alcohol ASB / 102 for all ASB). However, in Midland Road it is a factor of 4.8x. For Tavistock Street it was a factor 4.0x. These higher ratios of alcohol to non-alcohol related ASB within these two CIPs may be linked to the higher density of off licences, but this would need further research to establish any causality.

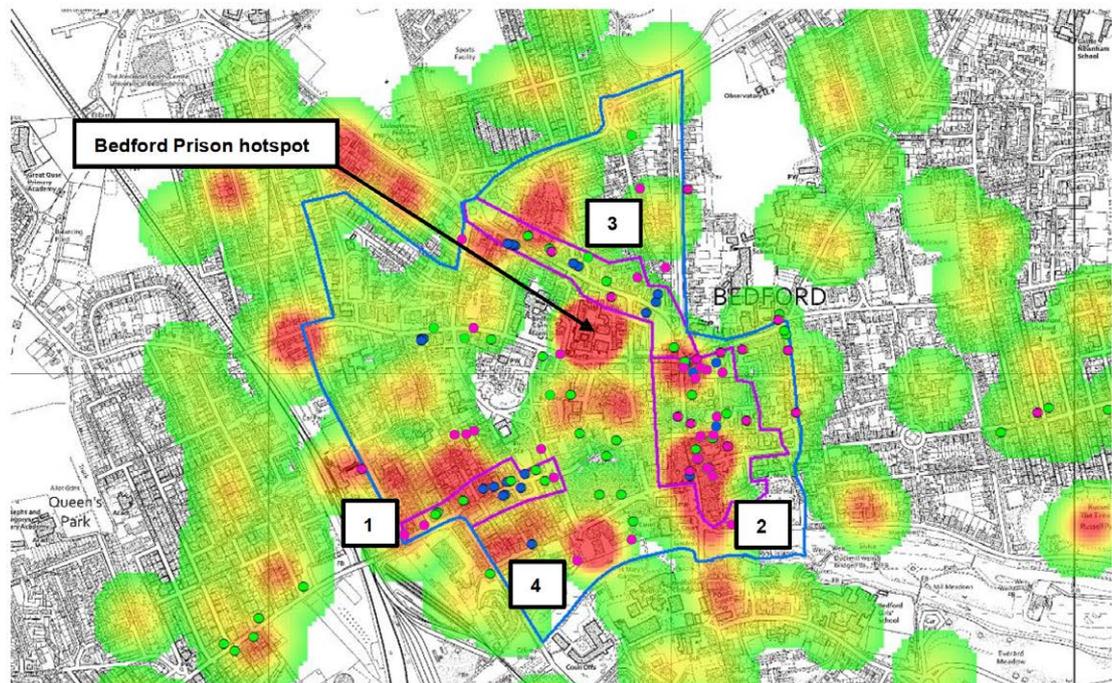
Figure 8: ALL RECORDED CRIME overlaid with location and type of premises
April 2019 to March 2021 ⁴



- 7.2.1.17 All recorded crime includes the full spectrum of crimes from the most serious, such as murder and attempted murder, rape and assaults, through robbery, drug crime, criminal damage, theft as well as drunk and disorderly, shoplifting, and public order offences.
- 7.2.1.18 Excluding the Bedford Prison hotspot (prisons and police custody suites are disproportionately affected by criminal activity), crime is concentrated in the three CIZs, but with an additional focus on the area between the three CIZs (area 4). This hotspot between the three CIZs is due to several reasons but crucially shoplifting and public order offences are high here.
- 7.2.1.19 This is important as when subsequent maps show the disaggregated individual offence categories commonly associated with licensed premises, alcohol misuse and the night-time economy, this central hotspot mostly disappears. This leaves the three main hotspots for nearly all crimes associated with cumulative impact located in the three existing CIZs: Midland Road (1), The High Street (2) and Tavistock Street (3).

4. Note. In all mapping there are several licence markers which sit on top of others given there maybe multiple licences within the same building or adjacent buildings.

Figure 9: SEXUAL OFFENCES overlaid with location and type of premises
April 2019 to March 2021



Key **Blue**: Late Night Refreshment | **Pink**: Pubs, Bars & Nightclubs | **Green**: Off Licences (supermarket & independent)

7.2.1.20 Mostly sexual offences follow the pattern of proximity to and within the three existing CIZs.

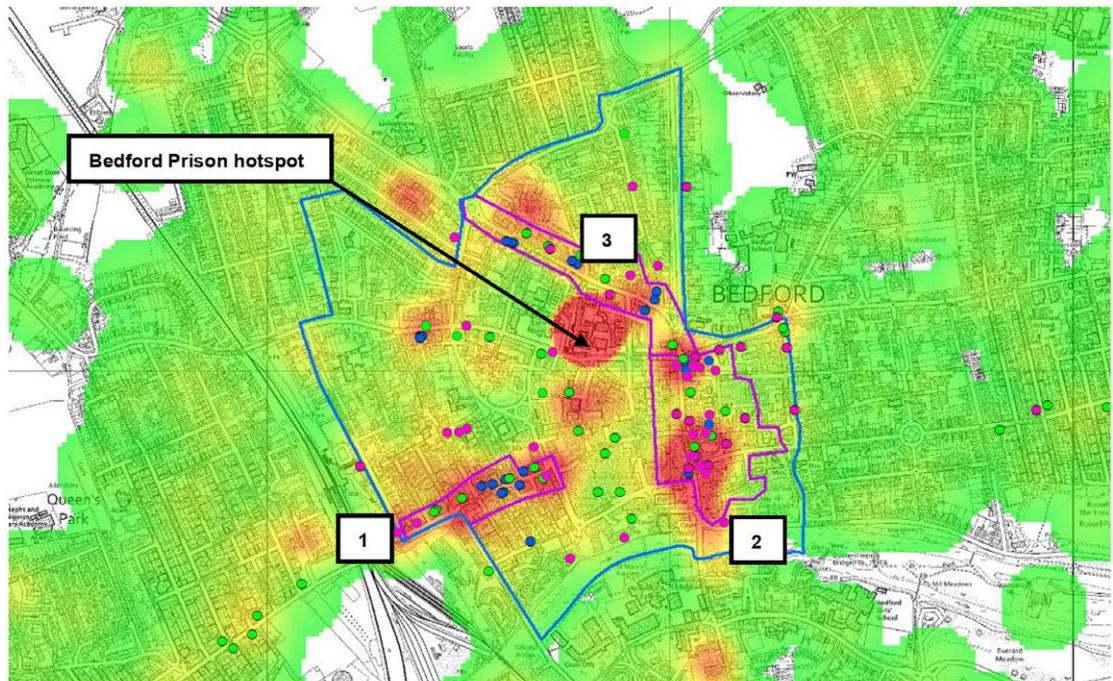
7.2.1.21 Within Midland Road (1) the offences take place to the immediate north and south of the street. There are a few possible reasons for this. Firstly, police intelligence suggests that in the residential areas in this location domestic violence and sexual offences are above the borough average. Secondly, the street itself offers few opportunities for offenders to target victims as it has very few on-licensed premises (being mostly made up of late-night refreshment and off-licences), is well lit and has considerable natural surveillance.

7.2.1.22 The High Street CIZ (2) remains the highest concentration of sexual offences, with clusters at the south end and the north end. It has the highest number of night-time economy late night venues as well as numerous alleyways and quieter spaces.

7.2.1.23 Midland Road (3) suffers less than the other two CIZs from sexual offences. There is a cluster at the north-western end of the street and a larger hotspot in the housing estate to the north of the street.

7.2.1.24 There is a further cluster near the riverside (4). This area, though better lit in recent years due to its regeneration, suffers from very limited natural surveillance at times and there are large areas of obscured view due to tree canopy and dark green space.

Figure 10: VIOLENCE AGAINST THE PERSON overlaid with location and type of premises April 2019 to March 2021

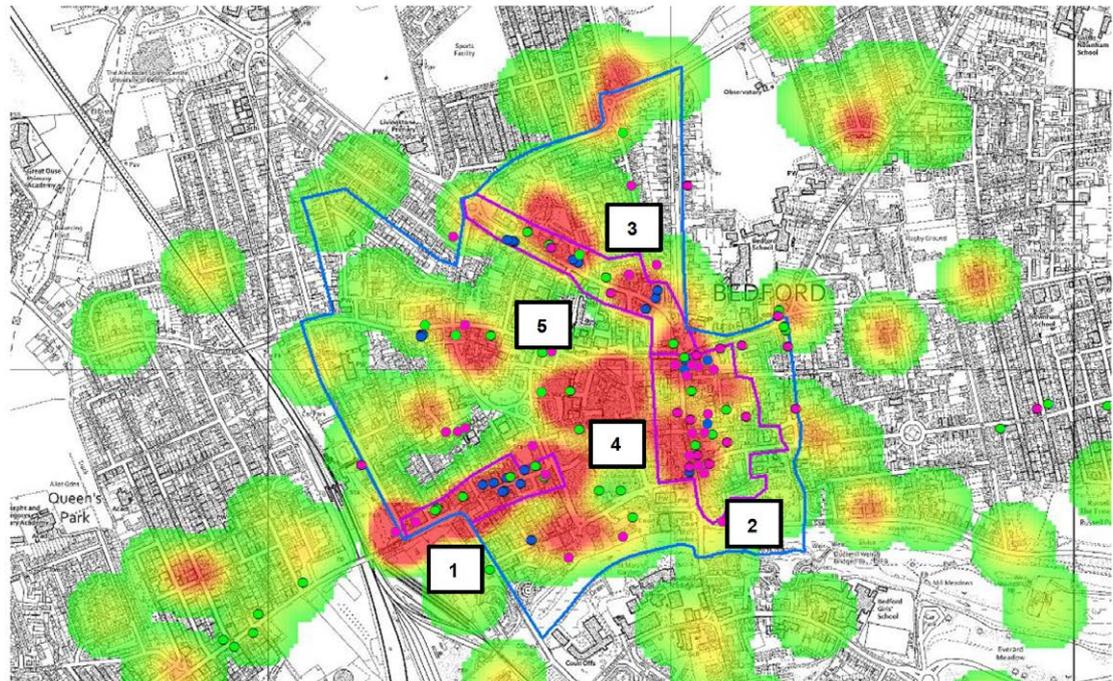


Key Blue: Late Night Refreshment | Pink: Pubs, Bars & Nightclubs | Green: Off Licences (supermarket & independent)

7.2.1.25 Violence against the person (ranging from harassment through common assault, GBH/ wounding with intent and murder) is concentrated in Bedford Prison, the High Street CIZ (2) and the Midland Road CIZ (1)

7.2.1.26 There are less intense clusters of incidents around (3) Tavistock Street, the town centre, and some low intensity nodes just outside the town centre.

Figure 11: ROBBERIES overlaid with location and type of premises April 2019 to March 2021



Key Blue: Late Night Refreshment | Pink: Pubs, Bars & Nightclubs | Green: Off Licences (supermarket & independent)

7.2.1.27 Robberies (as opposed to theft from the person) are particularly associated with Midland Road. (1) The density of incidents here is extremely high. And spills out slightly to the west and east of the CIZ.

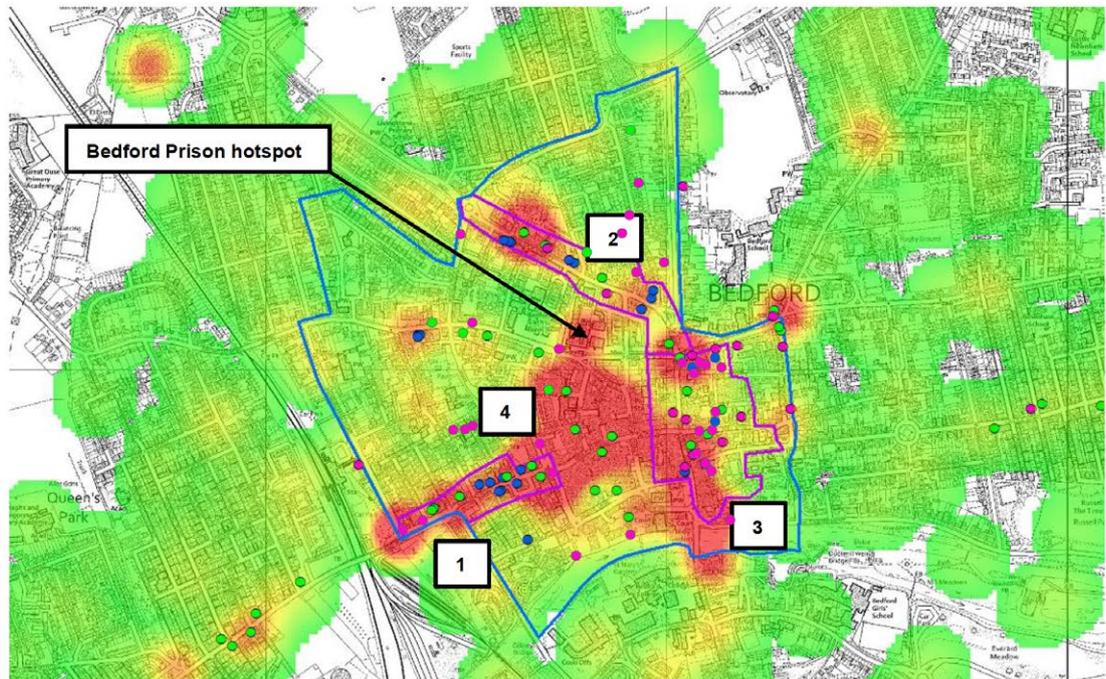
7.2.1.28 The High Street (2) is again a hotspot. Robbery here is concentrated slightly to the west of the High Street and to the north at the junction with the Broadway.

7.2.1.29 Tavistock Street (3) is another robbery hotspot with clusters at the southeast end and more centrally.

7.2.1.30 The area between the three CIZs (4) is also a robbery hotspot. The CCTV intelligence suggest this is mostly likely linked primarily to theft from shoppers and the lack of surveillance and footfall here at night as individuals travel between the town's three different night-time economy destinations.

7.2.1.31 Bedford Prison, as expected, does not feature as a robbery hotspot.

Figure 12 PUBLIC ORDER offences overlaid with location and type of premises
April 2019 to March 2021



Key Blue: Late Night Refreshment | Pink: Pubs, Bars & Nightclubs | Green: Off Licences (supermarket & independent)

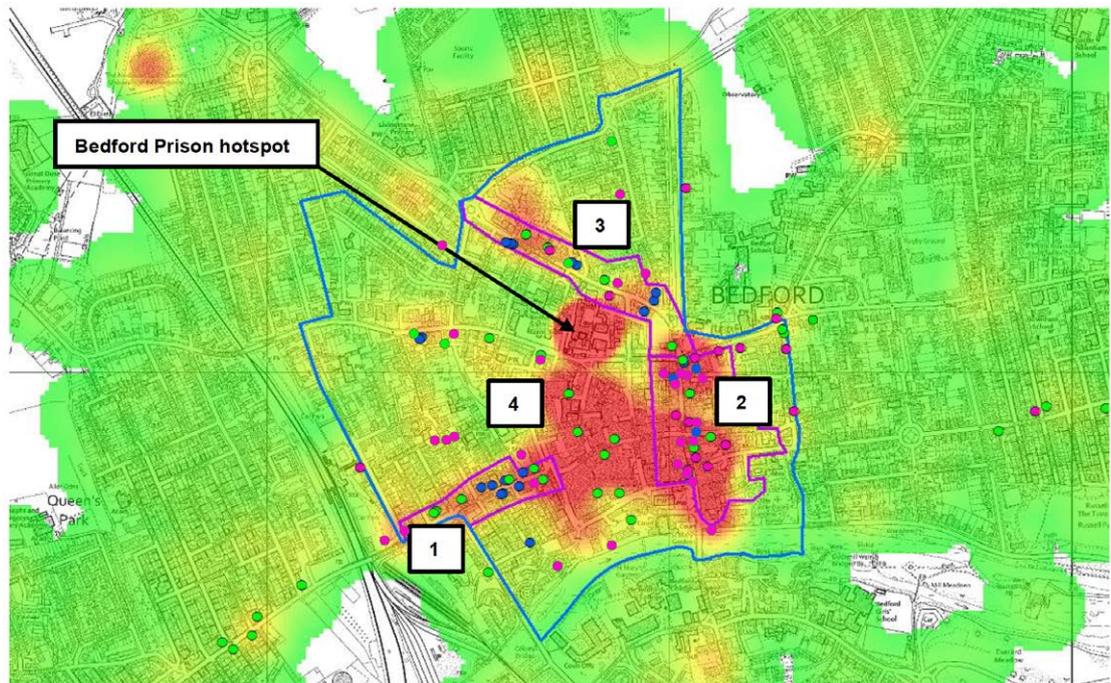
7.2.1.32 Public order is already a complex crime (incidents may appear at first to fall into public order or other crimes) and has been complicated by the presence of Covid with a national trend to more public order offences linked to those refusing to comply with legislation on public gathering, mask wearing etc. This will be the case in the second half of this 2019-2021 data, i.e., from March 2020 to March 2021.

7.2.1.33 However, public order also includes those who are drunk and disorderly (which appears numerous times within the CCTV data), or who cause harassment, alarm distress, violent disorder, or threats of disorder, all of which are present within the town's night-time economy.

7.2.1.34 The usual hotspots in the three CIZ areas are present again (1-3) but as is the centre of the town.

7.2.1.35 There is also a small hotspot at the prison.

Figure 13: CRIMINAL DAMAGE offences overlaid with location and type of premises
April 2019 to March 2021



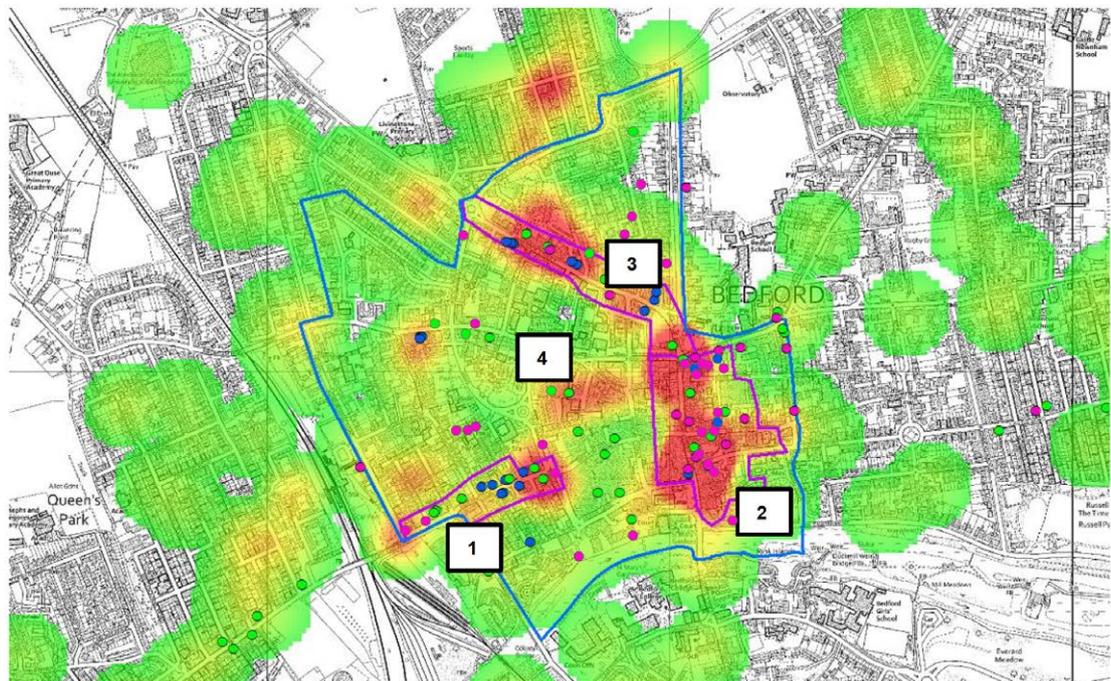
Key Blue: Late Night Refreshment | Pink: Pubs, Bars & Nightclubs | Green: Off Licences (supermarket & independent)

7.2.1.36 Criminal damage (property, vehicles etc) is strongly linked to alcohol misuse and the night-time economy, but not exclusively so (as the presence of high levels of this incident at Bedford Prison show).

7.2.1.37 There remain hotspots in both Midland Road (1) and Tavistock Street (2), but relative to the other crimes linked to alcohol, the night-time economy and cumulative impact these are more modest (albeit still much higher than most of the town centre and rest the borough).

7.2.1.38 The High Street (3) remains a high intensity hotspot for criminal damage as does the centre of town.

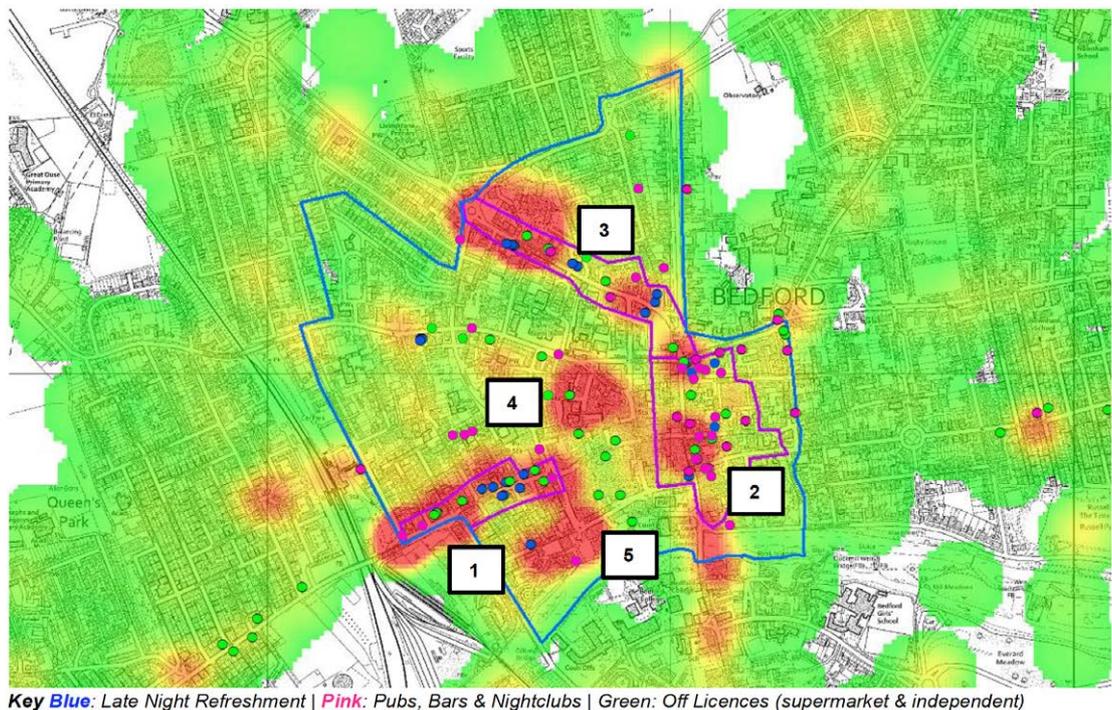
Figure 14: Alcohol-related offences overlaid with location and type of premises
April 2019 to March 2021



Key Blue: Late Night Refreshment | Pink: Pubs, Bars & Nightclubs | Green: Off Licences (supermarket & independent)

- 7.2.1.39 It is important to note here that because of the poor recording consistency for alcohol-related crime nationally, the overall number of incidents is likely to be much higher. The reason for this is that officers infrequently, and in some cases never, add the alcohol maker to the main reason for arrest.
- 7.2.1.40 This is also true of alcohol related hospital admissions, which academic studies have shown are a true fraction of the real total because the admissions where alcohol was involved (except those where alcohol was the main reason for admission) are rarely accurately captured.
- 7.2.1.41 The night-time economy area of the High Street (2) remains the main location for alcohol-related crime, followed by Tavistock Street (3)
- 7.2.1.42 148. There are very low levels of alcohol-related crime outside of the three existing CIZs.
- 7.2.1.43 This is an important observation because there are higher levels of some other crimes, e.g., criminal damage in the town centre. Yet, there is virtually no alcohol-related crime there (area 4). Notwithstanding the point above about alcohol-recording, this strongly suggests that the crimes that are taking place in the three existing CIZs are associated with the consumption of alcohol.

Figure 15: Recorded ASB overlaid with location and type of premises April 2019 to March 2021



7.2.1.44 ASB is the best indicator available for the public nuisance objective of the Licensing Act's four licensing objectives. However, it does include incidents and offences that do not involve alcohol or licensed premises and their cumulative presence, so this must be considered carefully.

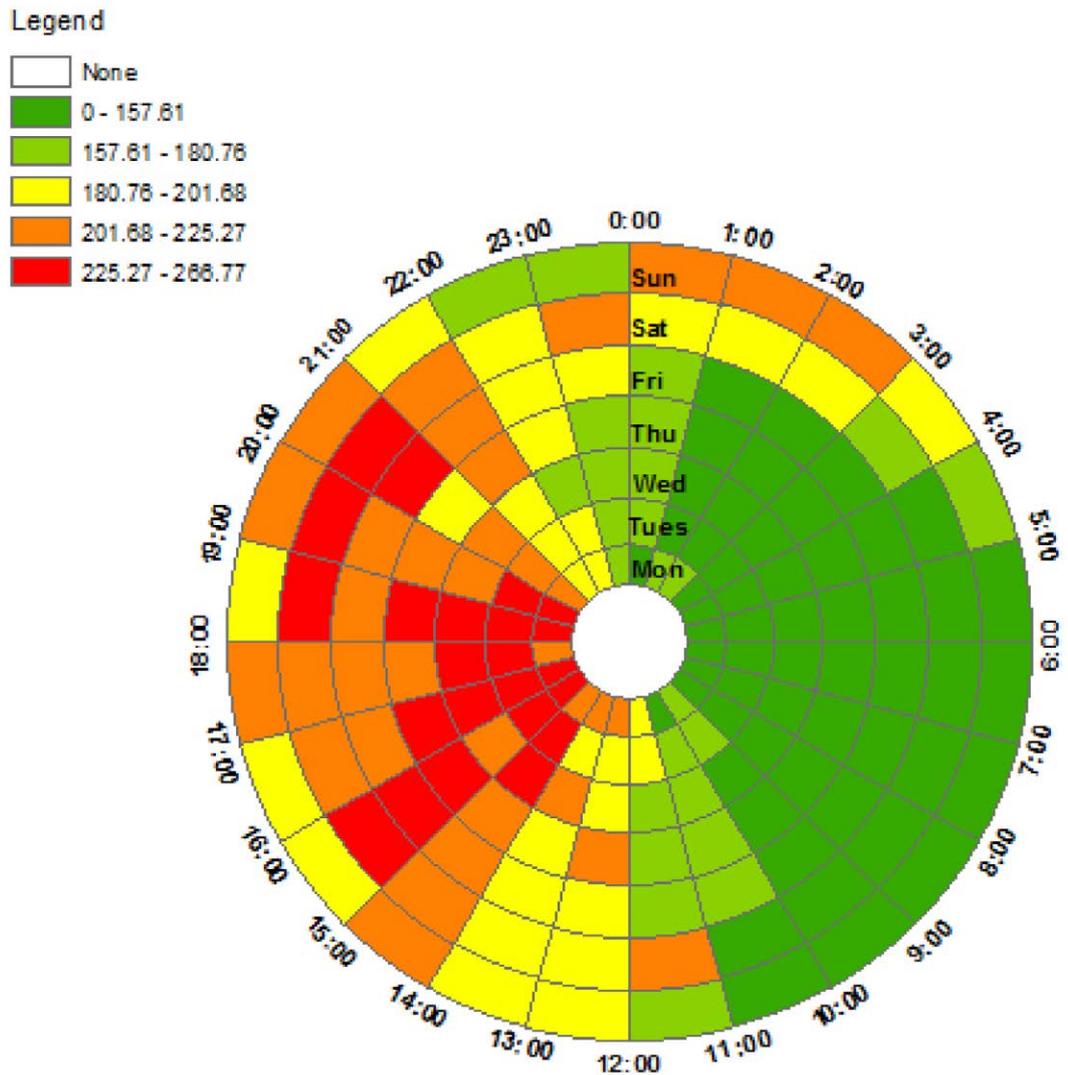
7.2.1.45 To some extent, this complex picture of ASB is reflected in the hotspot mapping above. Tavistock Street (3) and Midland Road (1) are the two most severe ASB hotspots in the borough, but it is likely that this is also linked to the housing areas around here as well as the known street drinking problems.

7.2.1.46 The High Street CIZ (2), the riverside near River Street and Horne Lane (5), and the Town Centre area in-between the CIZs (4) are the next three most intense hotspots. The latter two have very few licences. This suggests that whilst the presence of licensed premises is associated with the most intense ASB problems, that it is evident that areas away from these can also suffer to some degree. However, it is also reasonable to assume that some of the ASB outside the CIZs is also related to the consumption of alcohol – and drugs – as these areas are known as places that street drinkers favour for consuming alcohol, particularly the Riverside.

7.2.2 Data Clocks

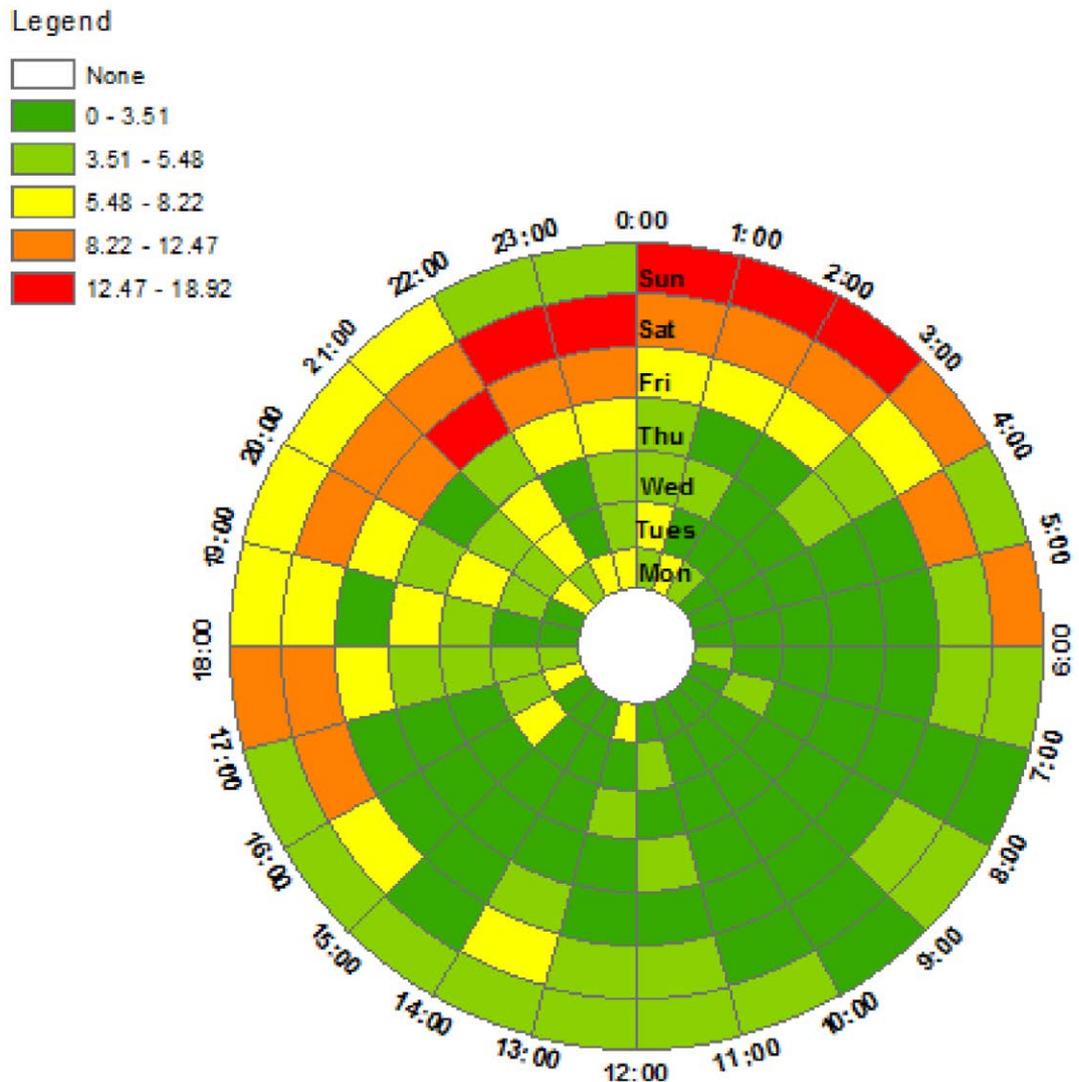
7.2.2.1 A selection of the same data (all borough) presented in the hotspot mapping above is also shown by hours of the day and day of the week. It is particularly helpful when trying to understand the impact of the night-time economy on crime and disorder and public nuisance.

Figure 16: ALL CRIME recorded offences data clock - by hour and day of the week, April 2019 to March 2021



7.2.2.2 All crime is a useful benchmark. This data clock shows that all recorded crime takes place mostly from mid-afternoon through to 22:00hrs, with some impact from the night-time economy on Saturday night and the early hours of Sunday morning.

Figure 17: ALCOHOL RELATED CRIME recorded offences data clock - by hour and day of the week, April 2019 to March 2021



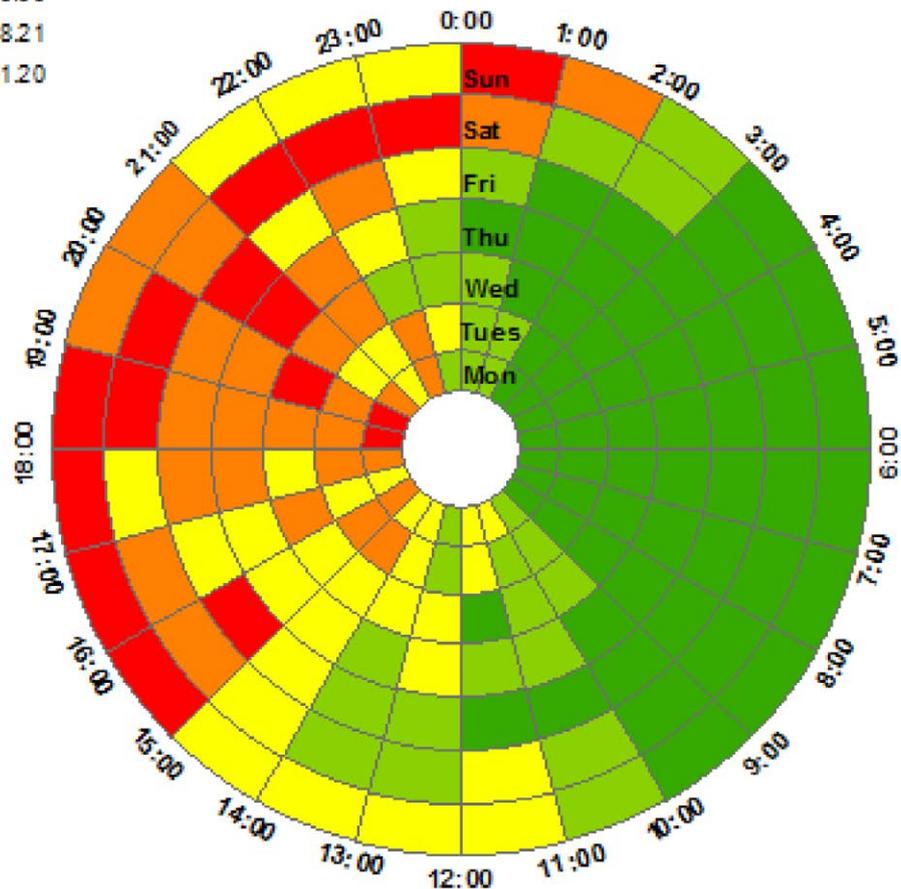
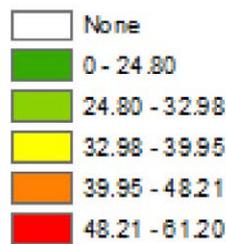
7.2.2.3 Crime with an alcohol marker shows an expected pattern, one which is quite different to all crime:

- During the afternoon and up to around 8pm there are moderate increases of crime (yellow) on most days but particularly Saturday and Sunday.
- This remains broadly the same from Monday to Thursday to midnight and the early hours, primarily because Bedford has very little night-time economy during the week.
- On Friday and Saturday evenings crime begins to rise (orange) and by midnight on Saturday nights / Sunday mornings (the early hours until 3am) it peaks.

7.2.2.4 The most intense alcohol-related crime take place on Saturday / Sunday with Friday/ Saturday also an issue but slightly less problematic. This is reflective of a national trend towards Saturday being the main socialising night out (outside of London).

Figure 18: ALL ASB recorded offences data clock - by hour and day of the week, April 2019 to March 2021

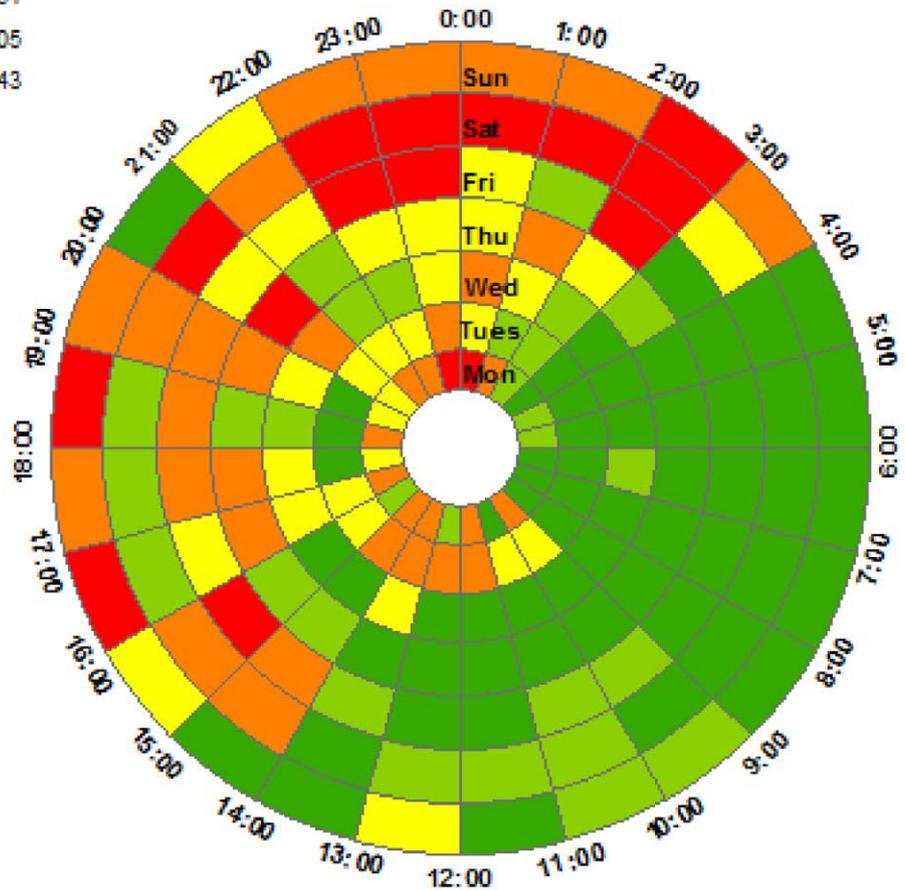
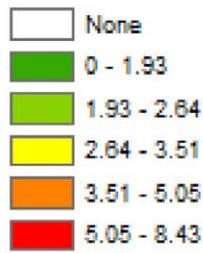
Legend



- 7.2.2.5 ASB in Bedford follows a pattern found more widely – that it is synonymous with the hours of the night-time economy but also present during the day and, in particular, the late afternoon. This is usually linked to several trends – firstly young people after school or during the holidays and street drinkers who can become more problematic as the afternoon proceeds, and they have become more intoxicated.
- 7.2.2.6 ASB data tends to be subject to a different reporting pattern to that for more serious crimes. For ASB residents or local business are more likely to call the police due to noise, drunkenness, public order etc. whereas more serious crimes tend to be reported by police officers attending incidents.
- 7.2.2.7 During the day ASB is reasonably high in the afternoons across the whole week (making it different to those types of crime associated primarily with the night-time economy).
- 7.2.2.8 ASB is reasonably high on Friday and Saturday nights, when the night-time economy is at its busiest, but it is at its highest on Saturday and Sunday afternoons.

Figure 19: ALCOHOL ASB recorded offences data clock - by hour and day of the week, April 2019 to March 2021

Legend



7.2.2.9 This chart helps unpick all ASB data above. It shows that the peak of alcohol-related ASB takes place on Friday and Saturday nights (and to a lesser extent Sunday after 10pm).

7.2.2.10 161. There is still significant alcohol-related ASB during the daytime, but this is mainly post- 2pm. Sunday afternoon has the most alcohol-related ASB incidents.

7.3 Summary

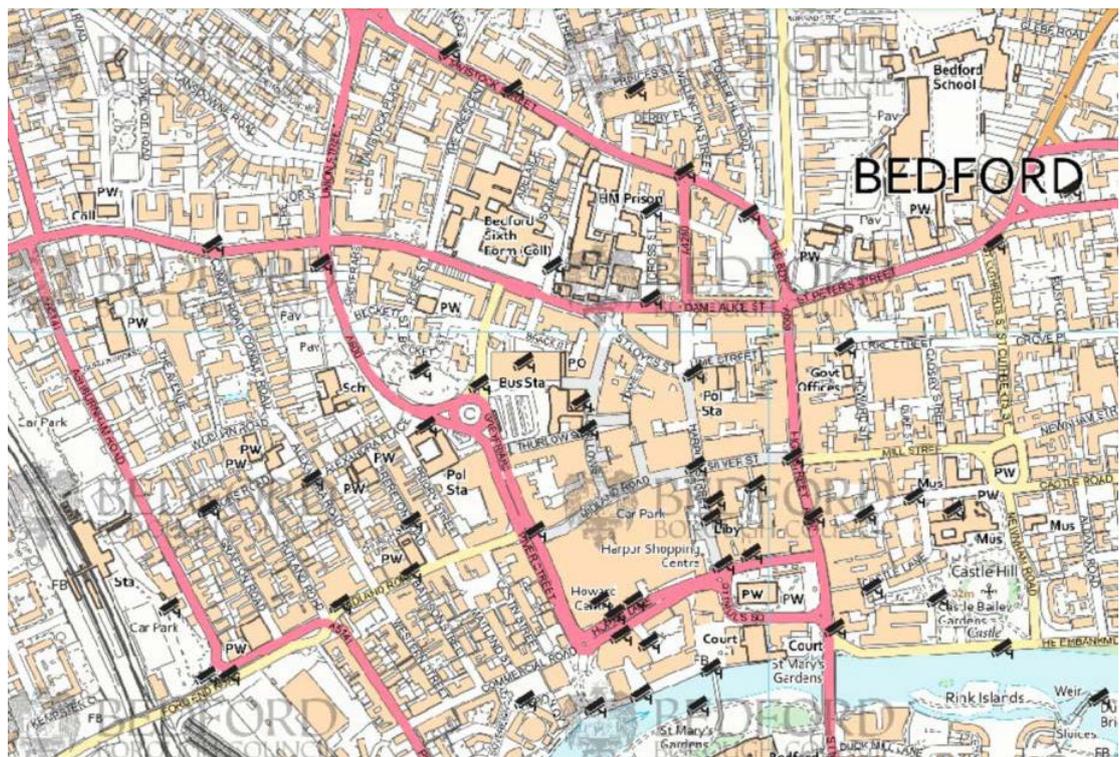
- 7.3.1 Most crime of the serious crime and disorder and public nuisance examined here, and which is recorded in Bedford borough, takes place within the town centre. There are virtually no crime hotspots outside Bedford town centre, and none that are in any way comparable to the town centre and the three existing CIZs, even in the town's suburbs.
- 7.3.2 As per 2017's cumulative impact assessment, the three existing cumulative impact zones of Midland Road, the High Street and Tavistock Street remain the three areas with the consistently highest levels of crime associated with the sale and consumption of alcohol and the night-time economy.
- 7.3.3 There is a strong association with street drinking related crime and nuisance in both Midland Road and Tavistock Street, particularly the former.
- 7.3.4 It is worth noting that within the High Street CIZ there are two clusters of crime and disorder – one to the north of the zone and one to the south. However, most incidents for most crime types are clustered around the highest density of late-night alcohol-led premises in the south of the zone.
- 7.3.5 For Midland Road and Tavistock Street CIZs there are some crimes where the distribution is not consistent across the entire CIZ.
- 7.3.6 It is worth noting that the rationale for the original CIZs was that they were drawn tightly around where problems of cumulative impact existed whilst acknowledging that there would be some micro areas or clusters of buildings within these CIZs which suffered less from crime and disorder and public nuisance.
- 7.3.7 However, where there were buildings that could reasonably be foreseen to be converted into further licensed premises within the CIZ, these were included. An example of this is the middle section of Tavistock Street between the junction with Harpur Street and Queen Street. Here there is less crime than at the north and southern ends of Tavistock Street (albeit there are still problems worse than the town or borough as a whole). However, it would not make sense to exclude this central stretch because if new licences were granted in this less problematic sub-area, this would almost certainly exacerbate the high intensity hotspots that it connects.
- 7.3.8 The CIZ areas were carefully drawn in 2018 not to include adjacent residential areas where there was no reasonable expectation of these buildings being converted into licensed premises and it is advised that this remains the case.

8. Findings: CCTV Data

8.1 Background

- 8.1.1 CCTV data was mined from two sample periods of eight weeks in June and July of 2020 and 2021 and fully anonymised for use by the researchers. The data gives descriptions of each incident recorded by CCTV operatives.
- 8.1.2 It is important to note that CCTV data cannot be seen as a ‘census’ of all crime and disorder or public nuisance taking place in the town centre or the existing cumulative impact zones. There are a number of reasons for this, and these are as follows.
- 8.1.3 There are approximately 100 council camera locations in Bedford borough (excluding those inside public buildings and car parks). Of these, 51 are within the town centre and 28 of these are inside or overlooking the existing the three CIZ areas. The disproportionate quantity of cameras within or adjacent to the CIZs (55% of the 51) suggests these are hotspots.

Figure 20: CCTV Locations in Bedford town centre



- 8.1.4 However, these cameras cannot possibly cover every location and every simultaneous incident. There are limits on what one operator can record at any one time, and they must also prioritise when there may be multiple incidents happening.
- 8.1.5 Most serious incidents of violence, robbery and disorder will be seen or reported to the CCTV control room by either the police on patrol or the security at licensed premises. However, a much larger number of low-level incidents that are taking place will either be missed by operators or not prioritised because the operator needs to focus on the most serious incident at any one time.

- 8.1.6 It is not possible, without having a team of observers on every street corner, to capture nearer to the full 100% of incidents (a census). Only if this was possible would it be possible to understand what the percentage of all incidents taking place the CCTV operators record. Experience in this kind of research tells us it will be much higher than the actual number recorded in the CCTV logs.
- 8.1.7 It is also worth noting that CCTV cameras may not sometimes be operational or may be obscured due to trees or buildings.
- 8.1.8 It is important to note that noise incidents are not captured. Other cumulative impact studies, where field observation has taken place, show that noise is a major public nuisance issue for residents in and around the night-time economy and clusters of licensed premises. As such, this element will be missing from the CCTV data.
- 8.1.9 In short, it is reasonable to say that the CCTV data is a substantial underreporting of what is taking place in terms of crime and disorder and public nuisance.
- 8.1.10 However, the two 8-week periods of data collection do give a significant picture of the type of crime and disorder and public nuisance that is occurring in the town centre, and crucially, at what times of day and which days of the week it is taking place. The data for the purposes here is therefore sufficiently robust.
- 8.1.11 In terms of how the data was analysed, the sample 237 incidents from 2020 and 303 from 2021 were manually reviewed and included or excluded based on whether they were night-time economy associated or had a reasonable correlation with the cumulative impact of licensed premises within the town centre. The following criteria was used for cumulative impact:
- Was there a mention of somebody entering, leaving a licensed premises (this includes late night refreshment places as well as pubs, bars, restaurants etc.)
 - Was somebody demonstrably drunk or exhibiting intoxicated behaviour (alcohol or drugs) in the town centre?
 - Was there a fight, altercation, theft or use of drugs that could be reasonably linked to users of the night-time economy?
 - Was there begging associated with licensed venues specifically or targeting of the users of the night-time economy who would not be there if there were not clusters of licensed premises.
 - Any other incident that has a reasonable connection to the customers of the night-time economy and licensed premises, whether as a perpetrator or as a victim of crime.
- 8.1.12 It is important to note that in many instances it is not possible (by the very nature of CCTV data) to categorically prove that each incident is absolutely linked to a licensed premises in the town centre or not. The ‘balance of probability’ has been used based on the fine grain detail of the individual reports. For example, if someone is staggering around in the street, whether day or night, they will likely have been drinking alcohol. In the evening and at night this tends to be people who will have had most or all of their alcohol in the town’s pubs, bars and clubs (although they may have pre-loaded with alcohol from venues not in the town centre).

- 8.1.13 Whilst every effort is made to exclude any incidents that are outside the CIZ boundaries, this is not entirely possible. However, it is worth noting that the observation in the previous CIA study showed that there are less intense but still considerable impacts from the cumulative presence of licensed premises beyond the CIZ areas themselves. For example, people walking home or fighting in streets outside the CIZ after a night out in one of the High Street bars or clubs.
- 8.1.14 It is also worth noting how cumulative impact is to be interpreted. Beyond the broad statement in the S182 Guidance, it is not proscribed in detail by law. If there is a negative externality from the presence of licences, then it does not matter whether or not it is a serious crime. If a series of actions from the patrons of licensed premises create a negative impact of any kind on one or more of the four licensing objectives, then it can legitimately be seen as cumulative impact.
- 8.1.15 So, for example, whilst an incident may take place inside a venue (and is thus in the first instance it is the responsibility of that licensee / DPS), nearly every one of these incidents has an impact beyond the venue. So, for example, aggressive or violent incident inside a pub becomes cumulative impact once they are ejected onto the street. If a police vehicle or ambulance is despatched to bring someone out, simply the presence of these vehicles is likely to have a significant impact on whether residents think their town centre is safe and pleasant or a place they want to go out in the evening to (public safety).
- 8.1.16 This is also the case with begging. Beggars are primarily begging for money, alcohol, drugs, or food, but their presence in the evening and night-time economy has become (as can be seen in these statistics) an increasing presence over the past decade in the night-time economy. They are attracted specifically by customers of pubs, bars, nightclubs, and restaurants and, even if not aggressively begging, this remains an issue of public nuisance and public safety. However, begging during the day around shops has been explicitly excluded.
- 8.1.17 Drug dealing is another area where there is considerable room for interpretation. During the day Bedford town centre appears to have low drug use. However, when it does occur during the daytime it does not appear to be linked to customers of licensed premises. However, most incidents after 6pm and before 6am would not be happening in the town centre if there were not a night-time economy and cluster of venues present. These drug-related incidents after 6pm are therefore included where appropriate.
- 8.1.18 Overall, the working definition of cumulative impact for this CCTV data is “anything that could negatively affect the four licensing objectives that takes place because, on the balance of probability, a cluster of licensed premises exists in Bedford town centre and the three existing CIZ areas”.

8.2 8.2 Findings

Figure 21: Sample of CCTV incidents in Bedford town centre and CIZ areas

Day	June & July 2020			June & July 2021		
	Total	NTE	Alcohol & Licence Related	Total	NTE	Alcohol & Licence Related
Monday	24	6	1	39	20	11
Tuesday	33	16	10	34	18	13
Wednesday	26	23	11	28	15	12
Thursday	35	25	10	34	17	14
Friday	36	21	7	38	20	13
Saturday	43	25	8	72	47	34
Sunday	40	22	6	58	38	35
Total	237	138	53	303	175	132

- 8.2.1 Overall, there were 540 incidents Bedford town centre over the two respective 8-week sample periods, recorded by CCTV.
- 8.2.2 Of these 540 incidents, 138 in 2020 and 175 in 2021 took place between 6pm and 6am (the night-time economy). This is 58% of all incidents. (NB not all incidents at night are linked to licensed premises and their customers, albeit the descriptions show the most are).
- 8.2.3 Of those incidents that could be considered ‘cumulative impact’ (i.e., with an explicit or implicit link to the misuse of alcohol or a licensed premises), there were 53 in the eight weeks during 2020 and 138 in the equivalent period in 2021 (191 in total).
- 8.2.4 The rise from 53 in 2020 to 138 in the same period is a change of 260%.
- 8.2.5 The fact that there was a much lower proportion of cumulative impact related CCTV incidents in 2020 sample period - when restrictions in England were still substantially in force and citizen behaviour was more cautious - than in 2021, suggests that the re- opening of the night-time economy and licensed economy is linked to an increase in alcohol-related incidents.
- 8.2.6 Generalising these two sample months up for annual incident totals does bear some statistical risks (particularly during the unusual conditions of the C19 pandemic and accounting for seasonal variations e.g., Christmas/ New Year). However, this has been done to give an indicative level of the likely number of CCTV incidents related to the NTE, alcohol and licensed premises to give an approximate annual total.
- 8.2.7 In 2020 this would have meant that there were around 900 CCTV recorded incidents in the night-time economy and 345 incidents linked to alcohol and licensed premises.

8.2.8 In 2021 this would have meant around 1,140 incidents CCTV recorded incidents in the night-time economy in 2021 and 860 incidents linked to alcohol and licensed premises.

8.2.9 Below are:

- A summary table showing the incident location pattern within the two sample frames in 2020 and 2021 sample by percentage,
- A table comparing the relative sizes of the CIZs, and
- A longer table showing a randomised sample of 100 (from a total of 191 relevant) anonymised CCTV incidents to give an insight into what is taking place in the town centre and CIZs. (NB. Dates have been removed to further anonymise incidents).

8.2.10 The sample of incidents taken from the overall list includes only those that have been classified as alcohol-related or - on the balance of probability – likely to be related to cumulative impact and the night-time economy, i.e., between 6pm and 6am.

Figure 22: Location of sample of CCTV incidents

Location	% Incidents
High Street CIZ	40%
Midland Road CIZ	26%
Tavistock CIZ	19%
Area between CIZs	15%
Total	100%

8.2.11 Despite the impact of Covid 19 restrictions on premises and the pandemic on consumer behaviour in 2020 (and to a lesser extent in 2021), the night-time economy, which is focused mainly in and around the High Street, was the area with the most incidents captured on CCTV in this sample. The High Street CIZ was typically a hotspot for late night drunkenness, fighting and ambulance call outs.

8.2.12 This was followed by Midland Road CIZ (which has a high concentration of fast food (late night refreshment premises) and off-licences. It is also a known street drinking location with homeless hostel accommodation nearby. There are numerous references in the incident logs to large street drinking groups and fights between street drinkers in this location.

8.2.13 Tavistock Street CIZ also has many takeaways and off licences. It is not possible to make direct comparisons with the previous cumulative impact assessment in 2017, but anecdotally this area appears to now suffer more street drinking and ASB type incidents than in the past.

8.2.14 It is important to note that the geographical disparity in the size of these areas is quite marked and should be considered when contextualising the results. The CIZs only make up 17.6% of the town centre, yet 85% of all incidents in the sample of 100 incidents take place within them or on their boundaries.

Figure 23: Size of town centre and CIZs

Location	Hectares	% of Town Centre	Incident / Hectare
Town Centre Total	100.2ha	100%	1.0
High Street CIZ	8.8ha	8.8%	4.5
Midland Road CIZ	2.7ha	2.7%	9.6
Tavistock CIZ CIZ	6.1ha	6.1%	3.1
Combinded CIZ Area	17.6ha	17.6%	4.8
TC Area outside CIZs	82.6ha	82.4%	0.01

8.2.15 Whilst the High Street CIZ has more incidents taking place in it, it is considerably larger and thus Midland Road CIZ has a higher density of incidents relative to its size (9.6/ha).

8.2.16 The most significant finding within this sample of incidents of alcohol related crime and disorder and public nuisance / cumulative impact is the very large disparity between ‘the average incident rate inside the town centre area but outside the three CIZs’ and the ‘average incident rate per hectare inside the three CIZs’ – 0.01/ha vs 4.8. This is almost 500 times higher.

8.2.17 This will partially be accounted for by the larger number of cameras located in and near the CIZs but only in part.

Figure 24: Anonymised sample of CCTV incidents, June/July 2020 and 2021

No.	Incident	Location
1	Tavistock St (off licence) known male has altercation with known male... pours beer over his head... leaving him in road.	Tavistock Street CIZ
2	Public order on St Paul's near to taxi rank – Units on scene – male arrested.	High Street CIZ
3	Scuffle breaks out – outside (High St CIZ night-time venue) – control aware – units attend – parties separated – IP taken to A&E by friends – no complaints made NFA.	High Street CIZ
4	Large crowds outside pubs on High St and (High St CIZ night-time venue) no social distancing in place – Police are to inform licensing - Table system is not being adhered to inside and customers are all congregating in the smoking area pub gardens.	High Street CIZ
5	Control request unit assists ambulance outside (off licence), Tavistock St. Observation on known street drinker seen on pavement. Ambulance leaves. Male gets up and aggressively begs. Unit attends. Male taken home.	Tavistock Street CIZ
6	Picked up two males fighting on Tavistock St – contacted control and image patched. Both males went their separate ways before officers attended. NFA.	Tavistock Street CIZ
7	Male unconscious corner of Midland Rd / Alexander Rd – Police attend – Intoxicated – taken home.	Tavistock Street CIZ

No.	Incident	Location
8	Picked up a male unconscious in Chandos St (Tavistock Street CIZ), reviewed footage and male had been assaulted and fallen. Contacted control and image patched. Officers attended and male was taken to hospital with a head injury.	Tavistock Street CIZ
9	15+ street drinkers on Chandos St (Tavistock Street CIZ)– Control inf.	Tavistock Street CIZ
10	Large crowds outside pubs (specific venue) on High St and (other specific venue) - no social distancing in place – Police are to inform licensing.	High Street CIZ
11	Harpur Centre report concern for intoxicated female sat on bench with friend – language barrier. Advised security to call 101. Observation on female –Ambulance attends, and female taken to A&E.	Area between CIZs
12	Overheard parking asking officer if he was OK. Assault on enforcement officer on Brereton Rd. picked up male chasing officer around a vehicle and onto Midland Rd. IP reports male entered (Midland Road off licence). Unit attends – ASNT for offender.	Midland Road CIZ
13	Taxi firm (High Street CIZ) reports 2 intoxicated female being led away by 2 sober-looking males - Concern for welfare.	High Street CIZ
14	Picked up large group fighting in Luddington's Passageway. 1 male seen trying to hit people with a bottle. Van crew inf. Group disperses. Male with bottle leaves in vehicle. Vehicle stops on Harpur St. Unit speaks to male – NFA.	High Street CIZ
15	Large group seen fighting on High St. 1 female punched off camera. Van crew inf – 1 arrest.	High Street CIZ
16	Monitored police airwaves unit requesting assistance on Midland Road outside (named licensed venue). Picked up the officers restraining a male on the floor, 2nd male refusing to move away also restrained by officers. More units attended – 2 arrested	Midland Road CIZ
17	Picked up agitated male on Chandos St continually getting in the face of female within larger group. Control inf – patched through.	Tavistock Street CIZ
18	Bike belonging to drunk male from 00:50 taken by another male from where it was left on Howard St. Control inf – no units available.	High Street CIZ
19	Picked up person lying on pavement – Lurke St (High Street CIZ) – Control inf. Unit attends. Female intoxicated – also a missing person.	High Street CIZ
20	Large group of street drinkers on Chandos St (Tavistock Road CIZ). Control inf. Unit attends – group moved on.	Tavistock Street CIZ
21	Control reports males being aggressive near (off licence) on Tavistock St – picked up a group of street drinkers nearby – units attend – no complaints.	Tavistock Street CIZ

No.	Incident	Location
22	(Off licence) on Midland Rd report a male refusing to leave – male appears intoxicated and is sitting on the floor drinking alcohol – image patched, and control informed – no units available.	Midland Road CIZ
23	Report of fight on Alexander Rd – ASNT small group seen Midland Rd/Rutland RD – no fighting patched – Unit attended – assault/incident had taken place Rutland Rd – off camera.	Midland Road CIZ
24	Large group of street drinkers seen on Chandos St (Tavistock Road CIZ)– PCSO informed.	Tavistock Street CIZ
25	Observation on unit dealing with drunk males on Union St (town centre). Patched through – males moved on.	Area between CIZs
26	Male causing issues with ambulance on Church Street (Midland Road CIZ) seen threatening officers. 1 arrest for Drunk and Disorderly.	Midland Road CIZ
27	Intoxicated female seen on bench in St. Peter’s St Gardens (Tavistock Road CIZ) –swaying and spitting. PCSO & control inf. Female leaves area at 18:34. Last seen on Kimbolton Rd.	Tavistock Street CIZ
28	Picked up highly intoxicated female on Rutland Rd (Midland Road CIZ) into vehicles and signposts. Control inf & patched through. Unit attends. Taken to home address on Maitland St.	Midland Road CIZ
29	Control reports fight at bus station (town centre). Seen on playback involving street drinkers – all now in order. Observations on group & patched through to control.	Area between CIZs
30	Control report female being assaulted on Priory St. Unit attends. IP runs onto Midland Rd – patched through to control. Female struggles with officers. Taken to station. Control updated. 1 arrest.	Midland Road CIZ
31	Picked up (known individuals) o/s (licensed venue) on Riverside Sq. – they appear to be having an argument with 3 males – control inf – 3 males then move on – unit attends to the males o/s (venue on Midland Road) – males claim to have had money stolen from them – details taken.	Area between CIZs
32	Control report street drinkers on Tavistock St. Group located under camera. XXXX in breach of order. Interviewed at roadside.	Tavistock Street CIZ
33	Picked up intoxicated male sprawled out on pavement – Midland Rd/Allhallows. Control inf & patched through.	Midland Road CIZ
34	Control report assault on Thurlow St (town centre). Located & patched through. 1 arrest.	Area between CIZs
35	St Pauls disturbance – (High Street CIZ) Units already on scene – 1 x arrested for possession of offensive weapon.	High Street CIZ
36	Report of rape believed to be Castle area (town centre) – description passed of offender – reviews begun.	Area between CIZs
37	Mill St (High Street CIZ). Drunk male stopped attempting to get into vehicle – Police staff in attendance with male had informed control – Police unit arrived 1 x arrested	High Street CIZ

No.	Incident	Location
38	Picked up a fight on the High St – control monitoring – officers attended – no complaint made.	High Street CIZ
39	Control reports group fighting Hassett St (town centre) – Picked up officers restraining a male on the floor – patched to control – 1 arrested.	Area between CIZs
40	(Licensed venue) on Mill St (High St CIZ) reports that around 5 mins ago an IC1 male smashed their window – picked up a possible suspect on playback running down Duke St – no other sightings – (Venue) will be reporting this to the police.	High Street CIZ
41	(Licensed venue) on the High St reports a fight o/s shop on Silver St – picked up a male on the floor – images patched – units and ambulance attend – male is taken to hospital.	High Street CIZ
42	Picked up domestic on the Embankment just as control calls to report female asking male to leave her alone. Patched through to control. Male seen assaulting female. Unit attends – 1 arrest.	Area between CIZs
43	(Licensed venue - Midland Road CIZ) request police to 2 intoxicated and abusive males. Located. Seen shouting & walking in the road. Control inf & patched through. They eventually leave the area.	Midland Road CIZ
44	(Licensed venue) (High Street CIZ) request Street Angels to attend to intoxicated female. SA inf. Observation on female.	High Street CIZ
45	Monitored officers on the High St arresting a male o/s (licensed venue) – male found in possession of an offensive weapon – 1 x arrested.	High Street CIZ
46	Tavistock St male fallen over and taken head injury – Police/ Ambulance in attendance - NFA.	Tavistock Street CIZ
47	(High Street licensed venue) request police to assist with males fighting at the location – images patched – van crew informed and attend to move the males on.	High Street CIZ
48	(High Street licensed venue) on Luddington's Passageway report males are climbing on the balcony at the rear of location – images patched – males eventually get down and move on.	High Street CIZ
49	Taxi reports a fight starting near to Wilkos on the High St – images patched – van crew are already on scene – a male is C.S gas sprayed and restrained – male is arrested for Drunk and Disorderly. 1 officer is also injured during the arrest and is taken to hospital.	High Street CIZ
50	(Licensed venue - High Street CIZ) reports having to remove an aggressive male from the location – male is outside but still arguing with door staff – van crew informed, and images patched – officers move the male on – NFA.	High Street CIZ

No.	Incident	Location
51	Off licence on Midland Road CIZ) report male in recovery position on Church Sq. MOP have called ambulance. Unit & ambulance attend. Male intoxicated.	High Street CIZ
52	The female from (High Street CIZ licensed venue) came back to the front, monitored to Duke Street. Fell down the stairs of the (another licensed venue), units attended - 1 arrested.	High Street CIZ
53	(High Street CIZ licensed venue) have an aggressive male inside. Monitored the location, patched to control and units attended. NFA.	High Street CIZ
54	(High Street CIZ licensed venue) request police to aggressive group refused entry. Control inf & patched through. Van crew attends. 1 male briefly restrained. Group warned and moved on.	High Street CIZ
55	(High Street CIZ licensed venue) request police. Aggressive male has returned & making threats to kill. Control inf & patched through. Van crew attends. Male taken to A&E where he becomes aggressive again - 1 arrest.	High Street CIZ
56	Observation on Male arrested for drunk and disorderly on High Street.	High Street CIZ
57	Picked up a male jumping on top of the police van on the High St refusing to get down - male eventually jumps down - more units required disorder on the High St - 1 arrested.	High Street CIZ
58	Control reports drunk males shouting at passers-by on Harpur St (town centre). Male located on Harpur Sq. Control inf & patched through. Unit attends - males become aggressive - backup requested. 2 arrested for Drunk and Disorderly.	Area between CIZs
59	Business reports of a fight outside the (High Street CIZ licensed venue) involving a large group of males. Police informed and image patched.	High Street CIZ
60	(High Street CIZ licensed venue) reports a fight at their location, Control informed, image patched, no unit able to attend. Door staff from (another (High Street CIZ licensed venue) and (another (High Street CIZ licensed venue) assists staff in (the original licensed venue).	High Street CIZ
61	Picked up a drunken altercation between 2 males in St Peters St Gardens (Midland Road CIZ)- control inf - no units - IP last seen De Pary's Ave.	Midland Road CIZ
62	(High Street CIZ licensed venue) request ambulance for a very intoxicated female o/s location - told them to call ambulance from the scene but doorman at the location refused to call one - control inf - ambulance attends at 23:12hrs - female is taken to hospital.	High Street CIZ

No.	Incident	Location
63	Night Team requesting police to high street, outside the (High Street CIZ licensed venue). Picked up door staff restraining a male on the ground. Officers attended. 2 arrested for Affray.	High Street CIZ
64	Large crowd on the High Street. Patched to control, more units requested to keep control, and the High Street was closed from Mill Street. At 03:30HRS monitored unit struggling with male on Mill Street, 1 arrested for Drunk and Disorderly. 03:34HRS The High Street was reopened	High Street CIZ
65	Picked up males pushing & shoving on Mill St (High Street CIZ). Control inf & patched through. Unit attends – fight breaks out. 2 males separated. Details taken – no complaints. NFA.	High Street CIZ
66	Monitored a group of street drinkers on Chandos Street, Junction Tavistock Street. Contacted control and patched over.	Tavistock Street CIZ
67	Fight on the High Street, between 2 males, control patched, and police attended. Police spoke to all parties no completes no action taken.	High Street CIZ
68	(Midland Road CIZ licensed venue) – eject group for fighting, smashing glasses and setting fire alarm off – Control informed and monitored – unit attended – other pubs made aware.	Midland Road CIZ
69	(Midland Road CIZ licensed venue) – request assistance for a refusal to leave – control informed.	Midland Road CIZ
70	(High Street CIZ licensed venue) request assistance with crowd – units attended and dispersed	High Street CIZ
71	Embankment – CCTV request units to group of England supporters throwing cones and road signs at vehicles entering Embankment – units attend Sec.35 issued	Area between CIZs
72	Control report (known individual) drinking on Tavistock St in breach of CPN. Located & patched through. Unit attends – male walks away as unit arrives. NFA.	Tavistock Street CIZ
73	Picked up group in the road on the Broadway (Tavistock St CIZ). Unit flagged down. Patched through to control. Male has been assaulted. Incident not captured. ASNT for offender. IP taken to A&E.	Tavistock Street CIZ
74	(Town Centre licensed venue) on Bromham Rd request police assistance for a fight outside location – images patched and control inf – units attend 2 x arrested for breach of the peace.	Area between CIZs
75	Control reports fight on High St. Seen on playback involving street drinkers. They have gone their separate ways – control updated.	High Street CIZ
76	Report on radio of 3 males begging and drinking on High St. Patched through.	High Street CIZ

No.	Incident	Location
77	Picked up motionless female laying on ground on Midland Rd. Harpur Centre security & Control inf. Unit attends - female spoken to - intoxicated.	Midland Road CIZ
78	Report on radio of street drinkers on Tavistock St (CIZ). Located & patched through. Unit moves them on.	Tavistock Street CIZ
79	Control reports fight on Riverside bridge - nothing seen - all bridges checked. Group eventually located by unit on the right-hand side of the town bridge. Incident off camera. 2 arrested for assault & indecent exposure. Observation whilst arrested - patched through.	Area between CIZs
80	Picked up (known individual) Alexandra Road (Midland Road CIZ) - female wanted FTA assault by beating - Contacted control & image patched.	Midland Road CIZ
81	Control reports a male has been punched and hit with a baton on the High St - CCTV playback shows incident happening o/s (licensed venue) on Castle Lane at 20:16hrs - control informed of bike VRNs - units stop bikes. 2 x arrested for GBH.	High Street CIZ
82	Report in radio of intoxicated male outside bank, Midland Rd. Playback shows male was on bench. Now out of view behind food van. Control updated. ambulance attend. Male taken to A&E.	Midland Road CIZ
83	Control report street drinkers on Tavistock St. Located & patched through. Unit attends - group moved on.	Tavistock Street CIZ
84	TR reports street drinkers being very noisy on Greenhill St (town centre). Located - control inf & patched through.	Area between CIZs
85	Picked up very angry intoxicated male on Tavistock St. Unit happens to drive past - male stopped and spoken to. Patched through - NFA.	Tavistock Street CIZ
86	Control reports fight and female screaming on Castle Rd (town centre). Control inf & patched through - they have been arguing all night. Unit attends - both spoken to. Female refused to engage. Unit leaves - they fight again. Control inf - Unit re-attends. Individual stopped and searched. Both parties go their separate ways.	Area between CIZs
87	Picked up (known individual) on the pavement o/s (Tavistock Road CIZ off licence) - members of the public are seen trying to help him - image patched - ambulance and unit arrives to assist - male is very intoxicated - taken to hospital.	Tavistock Street CIZ
88	Officers over the airwaves report being flagged down by a group on Midland Rd - images patched - details are taken - a Breach of the Peace is recorded.	Midland Road CIZ
89	Picked up officers on the High St with a very intoxicated female - 1 arrested Drunk and Disorderly.	High Street CIZ

No.	Incident	Location
90	Control report 9 people shouting on Harpur St. Group located on Midland Rd. Patched through. Male and female are main aggressors – verbal only. Group eventually disperses.	Midland Road CIZ
91	Request to monitor male outside (Midland Road CIZ off licence) causing issues to staff and members of the public – unit attended – male arrested.	Midland Road CIZ
92	Picked up male and female fighting on Midland Rd. Control inf & patched through. Female is main aggressor. Unit attends. Female spits and kicks at officers. Spit hood deployed. 2 arrested.	Midland Road CIZ
93	Picked altercation on Midland Rd. Develops into an affray as several people join in. Control inf. Main offender goes to bus station. 1 arrest on Allhallows. Male later de-arrested.	Midland Road CIZ
94	Control report female on the ground on Midland Rd. Located & patched through. (Known individual) seen with her – both are intoxicated. Another male seen with them on playback before female falls over. Possible altercation – last seen on Coston St. Unit attends.	Midland Road CIZ
95	Observation on (licensed on-trade venue) in Midland Rd – large group leaving (nearby) off licence - small scuffle seen – patched to control.	Midland Road CIZ
96	Male calls Police hiding on Midland Rd on top of bridge – states he was jumped by 20 males – same person from (Midland Road licensed venue) scuffle – located offenders – Units attended, and 1 x arrested.	Midland Road CIZ
97	Picked up three males fighting on Midland Rd o/s (off-licence) – contacted control and image patched – officers attend - 1 male has visible facial injuries – 2 males arrested.	Midland Road CIZ
98	Control report female concern for welfare. Picked up female on the embankment. Control inf – unit attends – NFA.	Area between CIZs
99	Parking report male lying face down on his bike on Lurke St. Control inf – patched through. Unit attends. Male very drunk – refuses all help.	High Street CIZ
100	Control report disturbance outside (High Street licensed venue). Known male then located on town bridge. Male makes off from officers – 1 arrest.	High Street CIZ

9. Findings: Ambulance Data

9.1 9.1 Background

- 9.1.1 Significant numbers of ambulance call outs for assaults and alcohol-related illnesses in the night-time economy, as well as to street drinkers, are a recognised indicator of cumulative impact. However, it is impossible with the alcohol element to know that every person who is picked up was using, or had used, a licensed premises inside a cumulative impact zone.
- 9.1.2 East of England Ambulance Service Trust (EEAST) were asked for data on ambulance related call outs to Bedford and provided basic figures for the financial years 2018/19, 2019/2020 and 2020/21. However, they were not able to provide data to the granularity of inside or outside the existing CIZs.
- 9.1.3 The East of England Ambulance Service Trust were also not able to provide maps in a similar format to those provided by the community safety analyst, so it is not possible to identify where exact incidents are taking place nor at what time.
- 9.1.4 A decision was therefore made, on this occasion, to omit ambulance data and to work with EEAST to explore the provision of more granular data for any future CIA.

10. Findings: Residents' Experiences and Views

10.1 Background

- 10.1.1 Bedford Community Safety Partnership (CSP) carries out an annual Strategic Assessment which is also used to develop the Community Safety Plan. Public consultation is an important part of this process, gathering data around the community's perception of crime and disorder, ASB and awareness of emerging issues in both their local area and the town centre.
- 10.1.2 At the time of preparing this cumulative impact assessment, the most recent research available was in 2019. (The pandemic disrupted 2020 when this would have been repeated and 2021 had not happened at the time of the CIA preparation). Combined with the same consultation results from 2018 this new data clarifies residents feelings about safety in the town centre and whether this has changed year on year.
- 10.1.3 The research takes places on a large scale. For example, in 2019 1,533 respondents completed survey online or in the community. Of these, 980 respondents were resident in an urban ward and 479 respondents recorded a post code from a rural ward (a small number did not record a postcode, so the overall total does not equal 1,533. However, this is reasonably reflective of where people live in the borough (albeit a little weighted to rural areas).
- 10.1.4 Of the 27 wards in the borough, the Castle ward (which contains the High Street CIZ, and Midland Road CIZ) and the Harpur ward (which contains Tavistock Street) were over-represented in the response levels. Castle ward returned the highest number of responses of any ward at 160 and Harpur the third highest, with 111 survey completions.
- 10.1.5 Typically, the average ward returned around 50 responses, suggesting that the residents in these town centre wards (where crime is much higher than the rest of the borough) are particularly motivated to respond, albeit it is not possible to be certain this was their motivation.

10.2 Findings

10.2.1 All residents were asked how safe they felt in the town centre during the day and after dark. The results are shown in the charts below.

Figure 25: Residents' feelings of safety in the town centre 2019 – DURING THE DAY

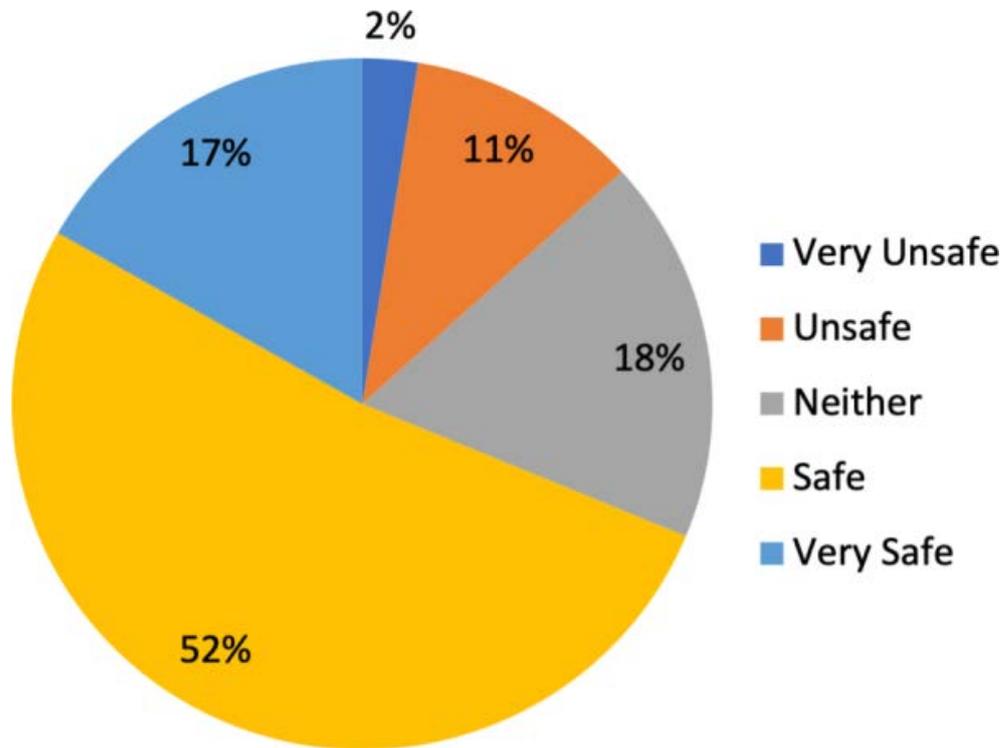
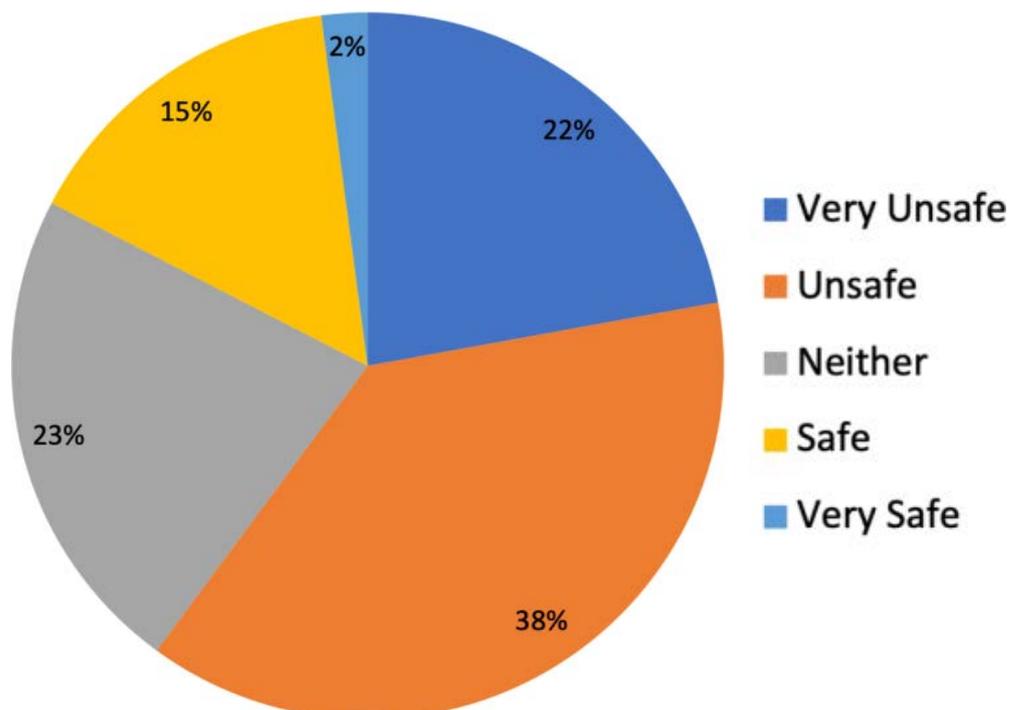


Figure 26: Residents' feelings of safety in the town centre 2019 – AFTER DARK



10.2.2 The results reflect trends seen nationally, i.e., those residents feel much safer during the day than at night, both in their neighbourhood and their town or city centres.

10.2.3 However, 60% of respondents saying that at night the town centre feels unsafe or very unsafe is a high level of fear (particularly as during the day the corresponding figure is 13%). Reasons given by residents for this are explored after the next table.

10.2.4 The table below compares 2018 and 2019. In summary, there is very little difference.

Figure 27 Residents' feelings of safety in the town centre 2018 vs 2019

Response	Day Time 2018	Day Time 2019	After Dark 2018	After Dark 2019
Very Safe	17.8%	16.8%	0.8%	2.1%
Safe	50.3%	52.0%	14.9%	15.3%
Neither	21.0%	18.0%	24.5%	22.5%
Unsafe	9.1%	10.7%	37.5%	38.0%
Very Unsafe	1.8%	2.6%	22.3%	22.1%

10.2.5 In 2019 those who felt safe after dark rose slightly from 2018 - 17.4% up from 15.7%. However, this was at the expense of those who felt neither safe nor unsafe, as those that felt unsafe after dark went up from 59.8% to 60.1%. However, these are within the statistical error margins for such a survey so should not be relied upon as indicators of a substantive change in residents' feelings. A 2021/22 survey would be required to see if feelings of safety after dark have changed since the pandemic.

10.2.6 Below is a table giving the coded free text reasons for why residents felt unsafe in the town centre. The sample was a substantial 997 individuals (though they could give more than one reason).

Figure 28: Why did residents feel unsafe in the town centre?

Factor affecting feelings of unsafety	%
Referenced the negative impacts of alcohol on the Town Centre	27.7%
Referenced the negative impacts of drugs on the Town Centre	25.7%
Suggested that a lack of police resources and funding was a factor	17.4%
Mentioned the impacts of begging on their perception of safety	16.8%
Specifically mentioned the towns 'Night Time Economy'	11.6%
Felt that groups of youths hanging around in the town made them feel unsafe	11.5%
Used the term 'Gangs' and how they are intimidating to visitors	10.2%
Mentioned the impacts of homelessness on their perception of safety	8.2%
Stated that rowdy and inconsiderate behaviour made them feel less safe	7.4%
Suggested that poorly lit areas of the Town Centre felt unsafe	5.6%

10.2.7 The most common reason given why residents in the town centre feel unsafe is due to the negative impacts of alcohol use. Obviously not all of those who are drinking will have bought their alcohol from the town centre licensed premises (for example there may have been some pre-loading at home). However, given the crime and CCTV data showing high levels of crime and disorder and street drinking in those areas with the largest concentrations of licensed premises (the three CIZs), it is a reasonable assumption that the majority is being purchased and consumed in the premises (on- sales) or in the street (off-sales).

10.2.8 Listed below are a selection of comments made in this question that give some context to the negative impacts that visitors experience.

“Excessive drinking can make the town centre feel very Intimidating”

“I feel unsafe because of drunken behaviour”

“Alcohol fuelled groups everywhere”

“Drinking in the street”

“Urinating in bushes”

“Cans and bottles in the streets”

“Drunks hanging around in green areas”

“Rowdy groups drunk”

“Aggressive drinkers”

“Peoples misusing alcohol, shouting at passers-by”

“People, who drink too much, turn nasty or violent”

“Drunk people swearing and shouting”.

10.2.9 After the negative alcohol impacts, drug dealing is the next most cited factor that causes residents to feel unsafe in the town centre.

10.2.10 Police numbers and visibility is always high up in the factors that makes people feel safe (and their absence makes them feel unsafe) in community safety surveys, as is street drinking and aggressive begging. However, specific references to the night-time economy is unusual and suggests that for around 1 in 8 residents this has an impact on how they feel in the town centre.

10.2.11 As is typical in community safety surveys, lighting is nearly always the least important factor with the public in terms of what makes them feel safe. It is much more the behaviour of those drinking alcohol, being rowdy, selling or using drugs or aggressively begging that has the biggest impact on people’s feelings of safety.

Figure 29: Below are the factors that residents (895 responded) said mad them feel safer in the town centre

Factor affecting feelings of unsafety	%
Stated that busy streets and lots of other people make them feel safe	42.1%
Felt that visible authority e.g. police, wardens) in the town was positive	24.5%
Recognised the importance of CCTV	11.8%
Listed street lighting as a factor of safety	9.5%
Mentioned the good community spirit and integration in the town	6.1%

10.2.12 There is considerable academic research that shows that natural surveillance, busy streets and people around make people feel safe when they are out and about. And conversely the same studies often show that people feel unsafe when an area is empty of people and movement, as it feels threatening, ominous and frightening.

10.2.13 However, the tables above also show that even if there are people around, if those other public space users are intoxicated with alcohol and / or drugs, selling drugs, exhibiting rowdy or inconsiderate behaviour or begging aggressively, they won't feel safe.

10.3 PSPO consultation 2019/20

10.3.1 In October 2020 the council consulted on the introduction a public spaces protection order (PSPO) targeting the prevention of alcohol consumption to tackle street drinking in the town centre. This was subsequently introduced in December 2020.

10.3.2 The proposed PSPO area was based on evidence produced by the community safety team of crime and disorder and public nuisance linked to the presence of street drinking. It was also based on the 2019 community consultation noted above, which covered street drinking, alcohol misuse and its relationship to crime and disorder and ASB / public nuisance, as well as a new survey in 2020.

10.3.3 The final PSPO area is a slightly different area to the council's town centre boundary as it includes some additional residential streets, but is largely the same and incorporates the three existing CIZ areas.

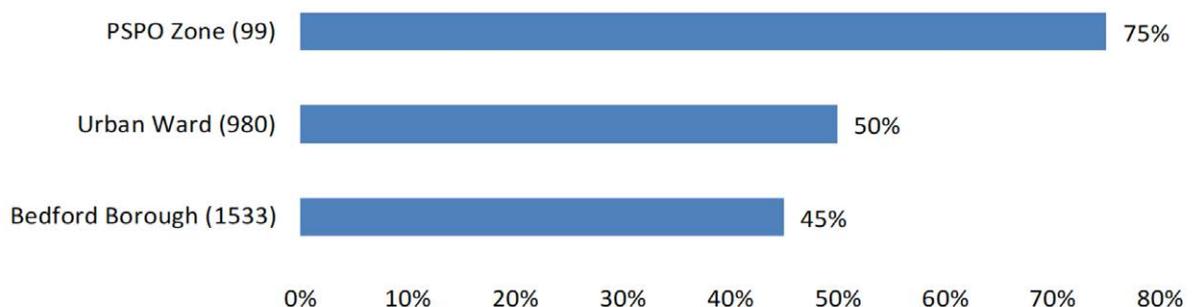
Figure 30: Map showing area (shaded) covered by alcohol prohibition PSPO



10.4 Results

10.4.1 The following table gives residents’ views of crime and ASB linked to alcohol misuse. It is divided into whether they lived in the proposed PSPO zone (i.e., broadly the town centre), in Bedford Town itself (the urban wards) and the borough average. It should be noted that the borough average includes both the PSPO zone / urban areas as well as the larger but less densely populated rural areas).

Figure 31: Residents saying that crime and ASB are linked to alcohol by locations

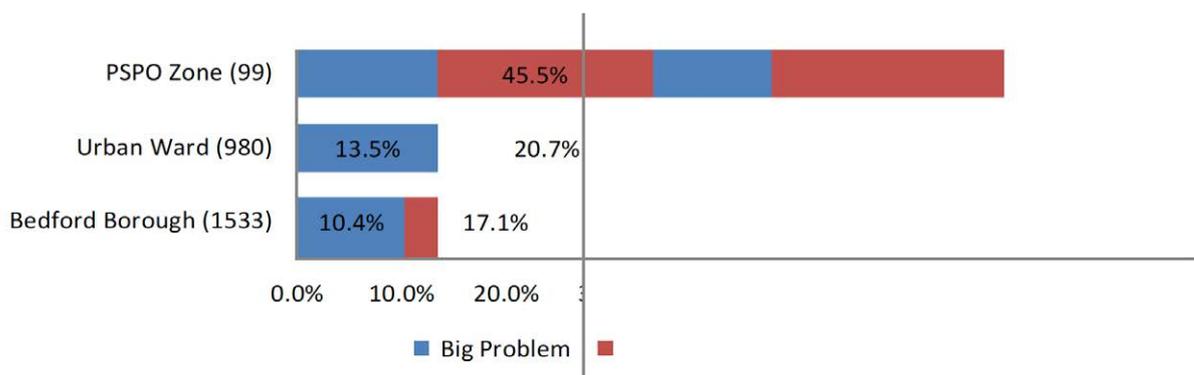


10.4.2 In general, 45% of respondents across the borough felt that alcohol was a contributing factor to levels of crime and ASB in their local community. This figure increases to 50% when data from just the urban wards is considered. There is a significant increase to 75% when the data for respondents that live inside the proposed PSPO zone was examined.

10.4.3 Residents’ experiences are therefore in line with the crime and disorder hotspot mapping and the CCTV observation data also shown in this report.

10.4.4 Respondent were also asked whether people drinking or being drunk in their area during the day was a problem. The results are shown in the table below.

Figure 32 Problem drinking and drunkenness – residents views 2019



10.4.5 Of all borough residents, only 10% suggested that people drinking or being drunk in their area during the day was a big problem. This increased slightly to 14% for the urban wards in the Borough. However, 46% of those living inside the proposed PSPO zone said that this was a big problem. This is a large variation.

11. Findings: Public Health

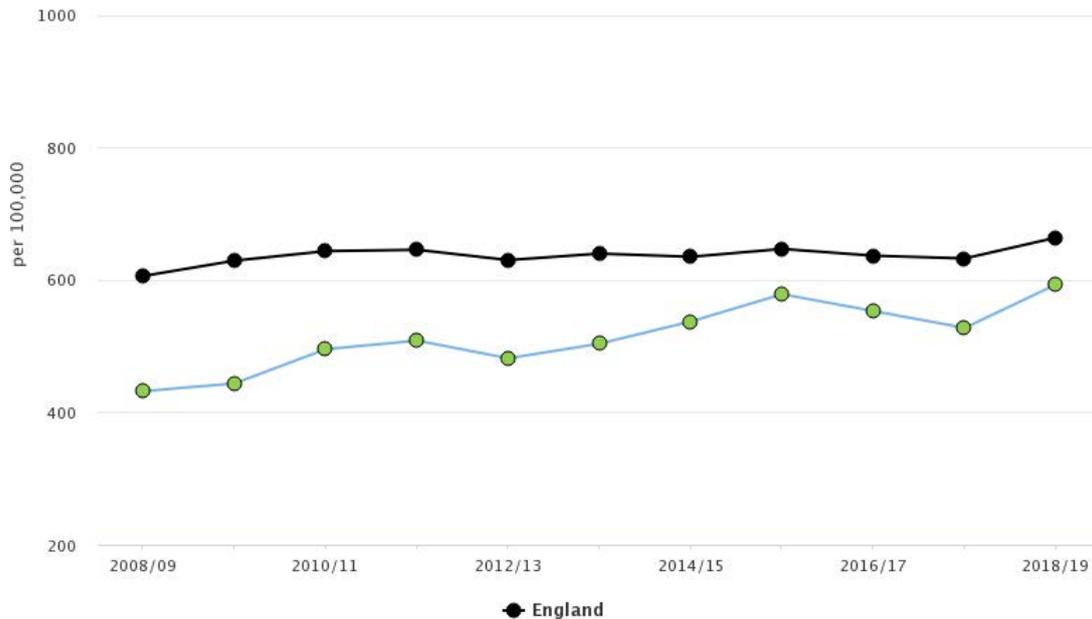
11.1 11.1 Background

- 11.1.1 Public Health is a statutory consultee under the Licensing Act 2003.
- 11.1.2 Whilst public health is not one of the four licensing objectives in England and Wales (unlike Scotland), public health is able to object to licences and respond to licensing policy.
- 11.1.3 This is most likely to be relevant on the basis of three of the four licensing objectives: *crime and disorder* (i.e., alcohol-related violence requiring hospital admissions) and *public safety* (fear of those who have consumed too much alcohol, for example in the street or in a domestic setting) and *protection of children from harm* (underage alcohol consumption and its negative individual health, crime and societal outcomes).
- 11.1.4 Alcohol plays an important social and economic role in society and most people who do drink enjoy alcohol without harm. However, excessive alcohol use can have a harmful effect on individuals, their families and the communities. There are huge costs to the UK economy with alcohol named as the most dangerous drug in the UK in 2009.
- 11.1.5 The health harms associated with alcohol consumption are widespread in every area of England, including Bedford. Nationally there are an estimated 10.4 million adults (Health Survey for England) drinking at levels that cause at least some level of risk to their health. Alcohol related harms are broad ranging and health-related problems include hypertension, cardiovascular disease, cancer, liver disease, *mental illness, accidents in the home and on the road, violence and premature death.* (*italics those that would be considered relevant to the Licensing Act 2003 and its four licensing objectives*).
- 11.1.6 Bedford Public Health provided the data in the following section on alcohol and alcohol-related harm in the borough.

11.2 Findings

11.2.1 Below are two figures showing statistics for Bedford and England for the Narrow Definition of Alcohol Admissions ⁵. The narrow definition covers admissions to hospital where the primary diagnosis is an alcohol-attributable code, or a secondary diagnosis is an alcohol-attributable external cause code.

Figure 33: Hospital NARROW definition alcohol admissions in Bedford Borough (blue) 2008/09 to 2018/19



Period	Bedford				East of England	England
	Count	Value	99.8% Lower CI	99.8% Upper CI		
2008/09	634	432	-	-	490	606
2009/10	653	444	-	-	531	629
2010/11	732	495	-	-	542	643
2011/12	754	508	-	-	559	645
2012/13	721	481	428	540	552	630
2013/14	773	504	449	562	582	640
2014/15	834	537	481	597	580	635
2015/16	912	578	521	640	588	647
2016/17	886	553	497	613	579	636
2017/18	857	527	473	586	594	632
2018/19	973	593	536	654	634	664

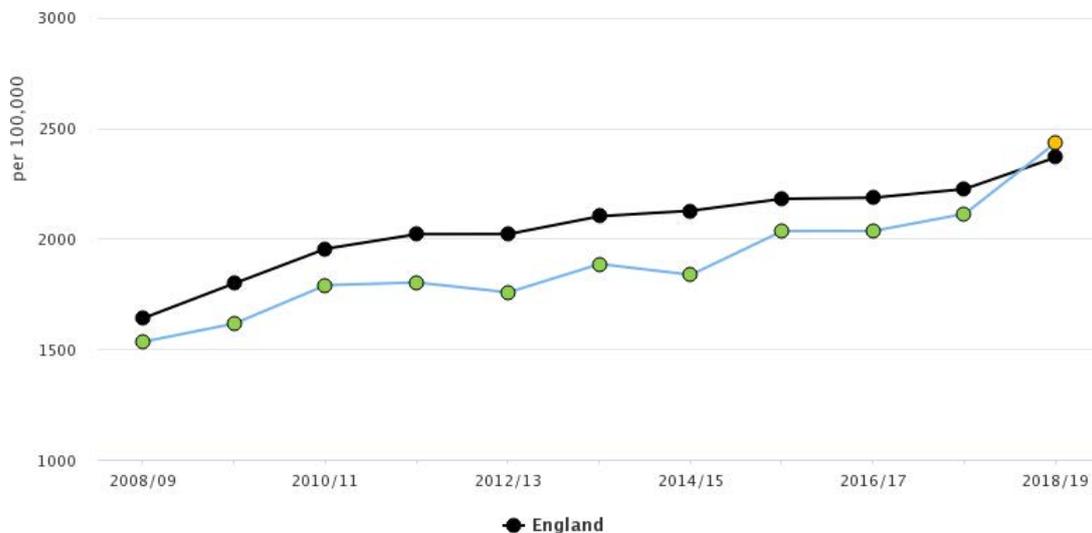
Source: Calculated by Public Health England: Population Health Analysis (PHA) team using data from NHS Digital - Hospital Episode Statistics (HES) and Office for National Statistics (ONS) - Mid Year Population Estimates.

5. Local Alcohol Profiles, PHE Fingertips Admissions (Directly age standardised rate per 100,000 population. Standardised to the European standard population).

11.2.2 Overall, the trend has seen narrowly defined alcohol hospital admissions in Bedford grow faster than the England average. They are now almost at the national average. 2018-19 saw the largest jump in admissions over the past ten years in the borough.

11.2.3 Below are two figures showing statistics for Bedford and England for the Broad Definition of Alcohol Admissions ⁶. The broad definition covers admissions to hospital where the primary diagnosis or any of the secondary diagnoses are an alcohol- attributable code.

Figure 34: Hospital BROAD definition alcohol admissions in Bedford Borough (blue) 2008/09 to 2018/19



Period	Bedford				East of England	England
	Count	Value	99.8% Lower CI	99.8% Upper CI		
2008/09	2,142	1,533	-	-	1,380	1,639
2009/10	2,275	1,615	-	-	1,575	1,797
2010/11	2,542	1,789	-	-	1,725	1,954
2011/12	2,579	1,801	-	-	1,791	2,020
2012/13	2,547	1,756	1,650	1,867	1,776	2,020
2013/14	2,792	1,885	1,776	1,998	1,868	2,101
2014/15	2,772	1,836	1,729	1,947	1,892	2,126
2015/16	3,137	2,033	1,922	2,149	1,958	2,179
2016/17	3,200	2,034	1,924	2,148	1,986	2,185
2017/18	3,367	2,112	2,001	2,227	2,052	2,224
2018/19	3,943	2,434	2,316	2,557	2,194	2,367

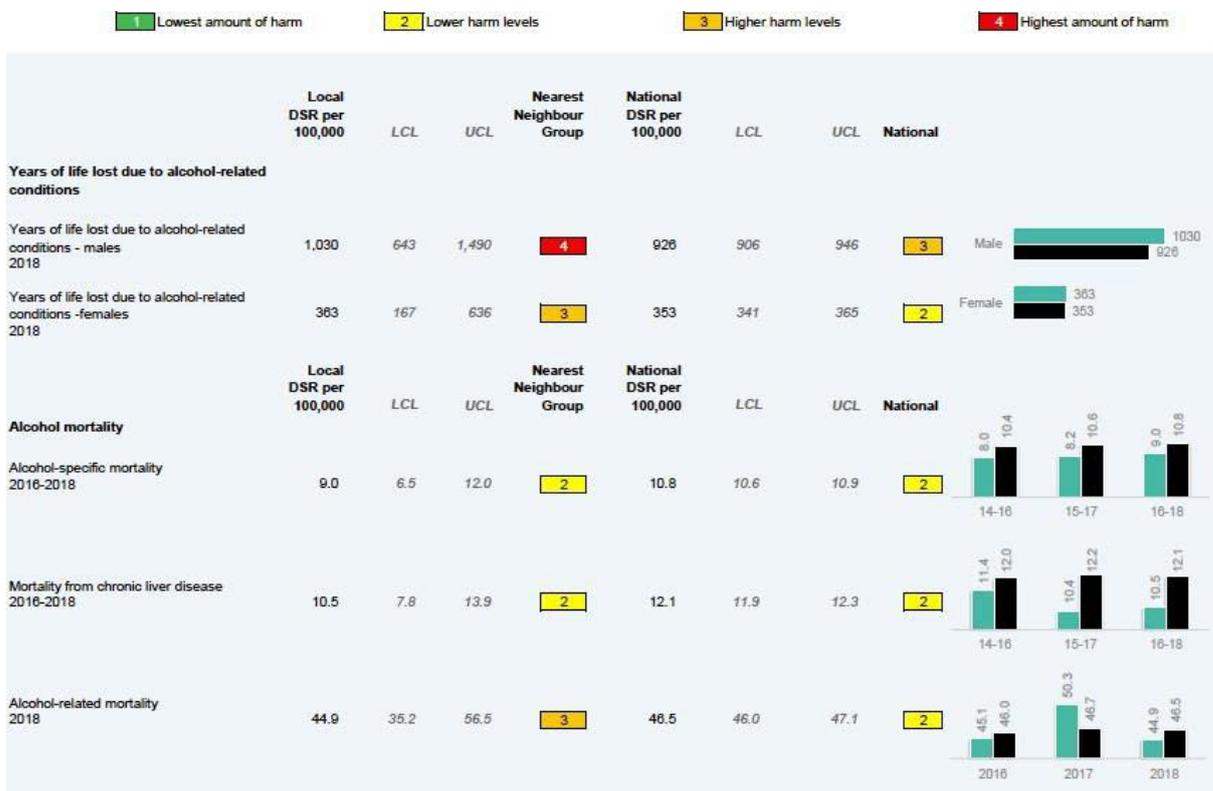
Source: Calculated by Public Health England: Population Health Analysis (PHA) team using data from NHS Digital - Hospital Episode Statistics (HES) and Office for National Statistics (ONS) - Mid Year Population Estimates.

6. Ibid

11.2.4 Overall, the trend has seen broadly defined alcohol hospital admissions in Bedford grow faster than the England average. They have now overtaken the national average. 2018-19 saw the largest jump in admissions over the past ten years in the borough.

11.2.5 The figure below shows several indicators of alcohol-related harm in the borough and at national level ⁷. Most of these aren't related to the Licensing Act's four licensing objectives, but within this there will be some deaths due to accidents or assault / murders where alcohol was a factor. Overall, Bedford has several indicators where it has lower than national average indicators. However, the alcohol-related mortality indicator is above national average.

Figure 35: Alcohol-related harm indicators in the borough 2016-18



11.2.6 The following shows levels of alcohol consumption by units per week in adults.

Figure 36: Health data showing levels of hazardous drinkers (those above 14 units a week) 2014

2011 - 2014 Health Survey for England data						
	Local %	LCL	UCL	National %	LCL	UCL
Proportion of adults who abstain from drinking alcohol	5.4	2.5	11.2	15.5	15.1	15.9
Proportion of adults drinking less than 14 units a week	60.3	50.8	69.0	59.1	58.6	59.6
Proportion of adults drinking more than 14 units a week	35.2	26.4	45.3	25.7	25.3	26.2

11.2.7 The data has not been updated since 2014. However, at that time, in Bedford, those drinking at hazardous levels was about ten percentage points higher than the national average. Those drinking at hazardous levels are more likely to suffer from alcohol related illness or be involved in alcohol related negative externalities, such as crime and disorder (e.g., violence in the night-time economy or domestic violence).

11.2.8 There is also likely to be a link between the rising levels of other alcohol health harms shown in the previous figures over the past few years and historically above average numbers of hazardous (14+ units a week) drinkers in the borough.

11.2.9 Below are charts showing details of those in alcohol treatment in the borough.

Figure 37: Age of adults in alcohol treatment 2019-20

Numbers in treatment in 2019-20								
	Local		Proportion by sex		National	Proportion by sex		
	n		M	F	n	M	F	
Number of alcohol only clients in treatment	307		66%	34%	74,818	60%	40%	
	Local	Proportion of all clients	Proportion by sex		National	Proportion of all clients	Proportion by sex	
	n	%	M	F	n	%	M	F
18-29	41	13	11	18	6,555	9	8	9
30-39	72	23	23	24	16,932	23	22	23
40-49	110	36	39	29	21,785	29	29	29
50-59	56	18	18	18	19,972	27	27	26
60-69	26	8	8	9	7,546	10	10	10
70-79	<5	1	0	1	1,695	2	2	2
80+	0	0	0	0	113	0	0	0

11.2.10 In Bedford, alcohol services clients make up a large proportion of clients in treatment, they tend to be of working age, male and white British.

12. Conclusions

Overall, there is a strong association between the high-density clustering of premises in the three existing CIZ areas of the High Street, Midland Road and Tavistock Street, and the presence of much higher than borough average levels of crime and disorder and public nuisance.

There does not appear to have been any significant expansion of cumulative impact related problems beyond the three existing CIZ boundaries.

There is some indication that in 2020, when there were more restrictions on licensed premises, that the levels of crime and disorder and CCTV incidents for cumulative impact were lower in the town centre than when the town was more open in 2021.

Street drinking remains a problem, particularly in Midland Road CIZ but also in Tavistock Street CIZ and neighbouring streets and public spaces.

The Riverside development and St Cuthbert's Street, as areas with new licenced premises, remain relatively low in terms of crime and disorder and public nuisance.

There does not appear to be any reason in this data to expand the CIZs or to modify the types of premises to which they apply.

13. Recommendations

Below are recommendations for the council to consider ahead of the repeat of this cumulative impact assessment when considering whether cumulative impact remains an issue in Bedford.

13.1 Recommendation 1

Specific data from the council's public health team updating the Local Alcohol Profile indicators for the last three years around alcohol-related hospital admissions, alcohol-related violence and binge drinking by ward would help allow a more nuanced picture of the link between time of crime and ASB incidents to be established.

13.2 Recommendation 2

Data on A&E admissions was not possible to gain from the borough hospitals due to the pressure on the NHS from Covid during the study. Capturing alcohol-related admissions and violence where alcohol is co-present in patients would enhance the robustness of the ambulance data.

13.3 Recommendation 3

Data on environmental grime and cleansing requests can be useful for identifying the public nuisance and public safety impacts of the night-time and licensed economy. Currently the council does not collect this in a format that is useable for cumulative impact assessment, and this could be addressed ahead of the next CIA.

13.4 Recommendation 4

The police and council children's services and child safeguarding board should consider developing data sets that will help establish if any relationship exists or not between the cumulative presence of licensed premises in the town centre and negative impacts on children, such as underage drinking or CSE (child sexual exploitation) and CCE (child criminal exploitation). They were asked for this CIA but were unable to provide any useable data.

13.5 Recommendation 5

Finally, in a post-Covid era, a repeat of the 2017 observational study in will allow further understanding of the low-level impacts of public nuisance from users of the night-time economy and licensed premises which are not captured via reported crimes and CCTV. This will be particularly useful for noise and low level ASB.

Finding out more

If you would like further information about us and our services, please telephone, email or write to us at our address below.

Për Informacion

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