

Bedford Licensing Study & Cumulative Impact Assessment

**A report by
MAKE Associates**

for

Bedford Borough Council

2017 (updated May 2018)

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1 SUMMARY

1.1 Background

1. This summary highlights the background and most important findings of the licensing study and cumulative impact assessment study undertaken by specialists in licensing research and the night-time economy - MAKE Associates - for Bedford Borough Council (BBC) in 2017.
2. **The study was updated in May 2018 to reflect the Government's updated Section 182 Guidance that accompanies the Licensing Act 2003. This put cumulative impact policies on a statutory footing for the first time:**

“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.”

“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.”

3. **To this end, this this Licensing Study and Cumulative Impact Assessment now forms the evidential basis for the *three* cumulative impact areas which Bedford Borough Council has deemed appropriate to consult upon and introduce from May 2018 into Bedford Town Centre. The Council will keep the cumulative impact areas under review and will revisit this cumulative impact assessment process within the next three years - as per the new legislative requirements (as set out in the Section 182 Guidance - revised in April 2018 - that accompanies the Licensing Act 2003).**

1.2 Objectives

4. The objectives of the study were:
 - a. To better understand the views of hard to reach groups in Bedford Town Centre on licensing issue.
 - b. To provide observational evidence to quantify what residents may be saying about low-level nuisance related to the licensed economy.
 - c. To quantify any issues around street drinking or late-night violence that is not reported to the police.

- d. To examine any issues of 'cumulative impact' that may exist due to concentrations of specific types of licenced premises.
- e. To provide useful comparisons to other locations that have undertaken similar studies.
- f. To provide an evidence base to help finalise Bedford's 2018-2023 *Statement of Licensing Policy* and support its ongoing robustness.
- g. To create a replicable method should a future study be needed to measure changes in the town's licensed economy.

1.3 Method

- 5. The study involved the following research methods:
 - a. Six day and night observation sessions (72hours) of Bedford town centre and the impact of licensed premises and public behaviour associated with them, including photographic evidence.
 - b. The council surveyed 368 residents on licensing and 1,300 on community safety across the borough (including a robust number in the town centre). MAKE surveyed a further 100 town centre residents about specific issues relating to licensing in the town centre.
 - c. A spatial and temporal analysis of crime and ASB in the town centre (conducted by the borough's community safety analyst).
 - d. Reference to best practice around licensing and specific issues of addressing street drinking and the management of the night-time economy.
- 6. The findings were presented to the council's licensing committee on 30th September 2017. Subsequently, MAKE hosted two workshops on 1st December 2017 with stakeholders from the borough's responsible authorities, residents and businesses to gain feedback and ideas that might address the issues raised in the research.
- 7. Following our report, the council can now decide how to use the data to draft its new *Statement of Licensing Policy*. We make broad recommendations of what the council might wish to consider including in this policy based on what we have found in Bedford and our experience nationally. However, this will need to be considered by the council and the community through its usual consultative and democratic processes.

1.4 Findings

- 8. Overall the research confirmed that there were *two* major issues with the behaviour of customers of licensed premises in the town centre:
 - a. Street drinking and its associated problems in and around Midland Road and, to a lesser extent, Tavistock Street.
 - b. Occasional violence but mainly antisocial behaviour and public nuisance in the High Street area and its vicinity linked to users of the night-time economy.

9. The **resident survey** showed they appreciate the facilities in the town centre and use licensed venues such as pubs, off-licences / supermarkets and takeaways.
10. However, residents are especially concerned about the negative impact of street drinkers, who purchase alcohol from the town's off-licences. This includes aggressive begging, drink vessel littering, urination and alleged drug dealing.
11. They are also concerned about the problems they experience with the night-time economy, particularly noise, urination, litter and feeling threatened at times by *some* users of the bars, pubs, clubs and takeaways around the High Street area.
12. Residents were supportive of a cumulative impact policy / CIP (70% in the borough survey / 81% in MAKE's town centre survey). Very few (18% / 8% respectively) were against this.
13. Of those who felt a CIP would be a valid tool to address issues within the licensed economy, 86% felt the policy should apply to *clubs*, the same for *pubs* (86%), and a similar percentage felt it should apply to *bars* (83%). To a lesser extent residents felt a CIP should also apply to *takeaways* (62%) and *off-licences* (52%).
14. 73% of those who supported a CIP felt it should apply to the town centre as a whole, whereas applying such a policy to individual streets was considered less preferable.
15. The stakeholder groups, once they understood the policy, were broadly supportive, but were more likely to suggest that such a policy was targeted at the areas where the evidence of negative impacts of the licensed economy was most compelling.
16. Residents were broadly supportive of restrictive measures to limit entry into licensed premises later at night / early hours (79%) (which was also broadly supported by most stakeholders). Support for restricting opening hours for licensed premises (68%) and limiting the sale of high strength low cost alcohol (63%) were considered useful policy tools.
17. Residents in the town centre were significantly more likely to say that crime / ASB had *gotten worse* in their neighbourhood over the past year than residents borough-wide (36% vs 27%).
18. Residents would like to see more cultural facilities in town centre, saying there were 'too few' *live music events* (41%), *festivals* (38%), *comedy* (41%) and *theatre* (42%) and *later retail* (30%). 49% felt there were 'too many' *takeaways*.
19. 81% of residents felt 'safe or very safe' during the *day*, but only 30% during the *evening* and 15% at *night*. Whilst the daytime figure is typical of other locations, these evening and night-time figures are the lowest we have seen.
20. However, more residents say they have seen crime take place in Bedford town centre during the daytime (23%) vs night-time (11%). This will be partly because fewer residents are out after

11pm, but it also suggests that at night their concerns around safety are partly perceptual or because of the very intense experience of locations such as the High Street.

21. The **crime analysis** shows that the most serious violent *crime* is evenly distributed across the town centre including residential areas. However, less serious *crime* is clustered around the main NTE area in the High Street. Sexual offences are highest in and around the High Street, Tavistock Street and Midland Road.
22. Antisocial behaviour (or *public nuisance*) associated with the licensed economy (e.g. rowdiness, street drinking, noise complaints) are located primarily in the NTE area of the High Street and at the western end of Midland Road.
23. Recorded street drinking and begging *crimes* are strongly linked with the presence of off-licences, particularly in Midland Road.
24. There is also a positive correlation between the presence of licensed premises of all night-time economy types (e.g. bars, pubs, clubs and takeaways) and *public nuisance* and *crime and disorder* in parts of Bedford town centre.
25. The **observational study** of the town's licensed economy recorded 473 individual incidents in contravention of the licensing objectives over the six-day observation period.
26. Of these 473, the largest number (139) were *drunken noise* sufficient to wake people up or to be aggressive or unpleasant. 74 incidents were of *drunken behaviour* (such as staggering dangerously in front of oncoming vehicles). There were 41 incidents of *street drinking*, 23 of *urination*, 12 of *vomiting* and 13 of *fighting*.
27. The highest numbers of incidents take place between 03:00 and 04:00hrs on Friday (and particularly) Saturday nights. Daytime problems are less frequent but still exist. The main location is the High Street at night and then Midland Road during the day. Tavistock Street experiences lower levels of problems day and night.
28. There are *public nuisance* noise and urination issues from some people leaving the town centre's night-time economy in the High Street and walking through corridors such as St Peter's, Tavistock Street and, to a lesser extent, along the Riverside and Embankment and south towards St John's Street.
29. Overall, the pedestrianised heart of the town centre appears to suffer from very little crime and ASB linked to licensed premises.

1.5 Conclusions

30. In our experience, these results are relatively typical of a town of this size and its small but intense night-time economy. It is certainly problematic, but without being at 'crisis' point.

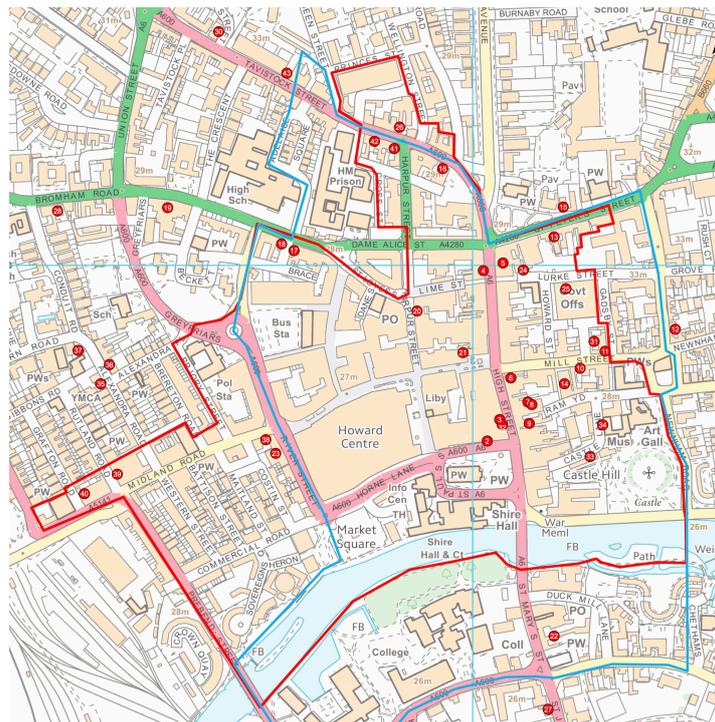
31. **We would say that Bedford town centre has *moderate* issues from its pub, bar and club-based late night-economy**, with some fighting, urination and disturbance on dispersal from the main venues in the High Street zone. This cumulatively contravenes the licensing objectives of *crime and disorder*, *public nuisance* and *public safety*.
32. **Takeaways are a *moderate* problem in the town centre**, particularly around the High Street, but also Tavistock Street and Midland Road where there are clusters of them. They contribute to littering (*public nuisance*), particularly late at night and attract some aggressive customers, which impacts upon *public safety*.
33. **Off-licences, particularly in Midland Road but also Tavistock Street**, are attractive to street drinkers, some of whom then cause problems in nearby residential areas with noise, aggressive begging and littering.
34. There were no incidents of the fourth licensing objective - *protecting children from harm* - observed in the research.

2 BACKGROUND

2.1 Introduction

1. This report highlights the approach to, and findings of, an independent study examining the evidence base for Bedford Borough Council’s licensing policy, the town’s licensed economy, crime and disorder and nuisance as well as residents’ experiences of Bedford town centre.
2. Throughout this report we refer *in italics* to the four licensing objectives that are set out in the Licensing Act 2003. Under this legislation every council (or ‘licensing authority’) must publish a ‘Statement of Licensing Policy’ (or licensing policy) at least every five years. The four licensing objectives are:
 - a. *The prevention of crime and disorder*
 - b. *The prevention of public nuisance*
 - c. *Public safety*
 - d. *The protection of children from harm.*
3. In its most recent licensing policy, the council created a concept which it called its ‘area of concern’ (see red boundary on map below).

4. This was a zone covering most of the town centre where it perceived there were problems linked to some of the licensing objectives created by some individuals who were using the town’s licensed premises. The evidence pointed in particular to problems with *crime and disorder* (particularly alcohol-related crime and nuisance) in and around the town’s night-time economy area – The High Street, but also with street drinking nuisance in Midland Road.



5. In principle, there is nothing wrong with the council having an area of concern for itself, but by including it in its statement of licensing policy this was outside the bounds of the Licensing Act 2003 and it was thus challenged.

6. The guidance that accompanies the Licensing Act 2003 specifies that a statement of licensing policy have a 'cumulative impact policy' or CIP (not area of concern) and that if a CIP is a designated then it must be supported by evidence that there are problems linked to the users of multiple licensed venues in an area and that this cannot be dealt with on a venue-by-venue basis.
7. Once a CIP has been designated, then it is up to any applicant for a new or extended existing premises licence (e.g. later operating hours, an extension to the size of a venue) to prove that they *won't* contravene any of the four licensing objectives (albeit there must be a representation against this application for the burden of proof to switch to the applicant).
8. It is also important to note that when we talk in this report of cumulative impact as a concept, this is separate from problem incidents that take place *inside* premises or their curtilage (e.g. smoking area), because, legally, any incidents inside premises are the direct responsibility of the licensee and her or his employees. Cumulative impact is about problems when away (however short a distance) from a licensed premise.
9. Two examples may help here. Firstly, a fight inside a smoking area *is not* cumulative impact. However, somebody leaving that venue and walking along the road and then shouting loudly causing annoyance to a local resident *is* public nuisance under the definition of cumulative impact in the guidance accompanying the Licensing Act 2003.
10. It is also worth noting that the responsibility for acts of crime and disorder or public nuisance remain those of the individuals committing them, whether inside a licensed premise or in the public realm.
11. Specialist licensing research and night-time economy consultants, MAKE Associates, were asked by Bedford Borough Council to give their independent and objective view on the existing evidence and to gather any additional evidence that was required to support the development of the new licensing policy.
12. MAKE are the leaders in night-time economy strategy development and licensing research. We provide insight and planning on the management of towns and cities 'after dark' to clients including national government (DCLG, DCMS, Home Office) and local authorities (from Liverpool to Westminster), as well as city mayors (e.g. London and Sydney) and city centre partnerships. We are frequently asked in licensing cases to provide objective and independent expert witness statements for committee and court hearings.
13. More information on MAKE's experience can be found in the *Appendices*.

3 OBJECTIVES

3.1 Introduction

14. There were six specific objectives for this project:

- a. To better understand the views of hard to reach groups in Bedford Town Centre on licensing issue.
- b. To provide observational evidence to quantify what residents may be saying about low-level nuisance related to the licensed economy.
- c. To quantify any issues around street drinking or late-night violence that is not reported to the police.
- d. To examine any issues of 'cumulative impact' that may exist due to concentrations of specific types of licensed premises.
- e. To provide useful comparisons to other locations that have undertaken similar studies.
- f. To provide an evidence base to help finalise Bedford's 2018-2023 *Statement of Licensing Policy* and support its ongoing robustness.
- g. To create a replicable method should a future study be needed to measure changes in the town's licensed economy.

4 APPROACH

4.1 Introduction

15. The approach to the research involved the following stages.



4.2 Council resident surveys

16. Before MAKE were asked to undertake this evidence review, the council had itself undertaken an unusually comprehensive process of community engagement around revising its licensing policy, both across the whole borough and with a focus in the town centre.
17. We reviewed this research, reported on in early 2017, and the 368 residents who responded provide a robust sample from which to draw conclusions and considerable detail about some of the challenges that exist in the town related to the licensed economy.
18. We also examined the borough's Community Safety Partnership 'annual safety survey' for 2016. This annual survey asks residents about how safe they feel in their neighbourhood, what would make them feel safer, (and if they feel unsafe) what are the main reasons why they feel unsafe in their neighbourhood.

19. We worked with the borough's community safety analyst to undertake some new and very specific analysis for this project by pulling out the findings for the Castle and Harpur wards from the overall borough statistics. We requested analysis by these two wards because they essentially make up the town centre.

4.3 MAKE in-depth surveys

20. It was felt that, despite the borough wide surveying undertaken by the council itself, that further insight was required into the views and experiences of those who live in the area around Midland Road, which is known to suffer from street drinking problems.
21. To do this we intended to moderate two focus groups that would allow us to explore the reasons why people in this area were so concerned about the licensed economy and how it impacted upon them personally.
22. However, due to the challenge of recruiting focus group participants in this area (despite financial incentives to do so), we moved to undertake 100 in-depth surveys that would complement what the council had already completed whilst adding some additional insight into residents' use of the town centre facilities in the evening and at night (e.g. pubs, bars, clubs, theatres, cinema, restaurants, gyms etc.).
23. We were also able to obtain useful data on whether residents in this part of the town centre thought a cumulative impact policy in parts or all of the town centre would be helpful or not in dealing with some of the challenges they report facing in Midland Road.

4.4 Crime and ASB analysis

24. In our experience of working with a range of community safety partnerships and police forces across the UK, our view is that the council and police in Bedford already have a strong understanding of the challenges that exist around licensed premises, alcohol-related crime, drug dealing and street drinking practices. Broadly their intelligence is reflective of what we found in the observational audits – see below. (NB the crime and ASB analysis is based on *recorded* crime, whereas our observations give a greater understanding of low level issues that remain unreported to the police).
25. For the purposes of this study we also worked with the borough's community safety analyst to produce fresh analysis that helped us specifically understand *crime and disorder* and *public nuisance* (ASB) behavioural trends by time (temporal) and location (spatial). We overlaid this 'hotspot' mapping with the locations of licensed premises. These maps are shown in the *Findings* chapter.

4.5 Observational audits

26. MAKE's most experienced field researcher also spent considerable time observing the town centre's daytime licensed economy and night-time economy zones, to provide a fuller picture

of how the town centre works at night, the differing demographics and behaviour of customers in each of its five distinct zones (the High Street, Midland Road, Tavistock Street, the Riverside and the pedestrianised town centre heart).

27. MAKE has pioneered this form of observational study in numerous other locations across the UK. The method is now well established, objective and robust and has been relied upon in licensing hearings and court cases.
28. The reason this element is so important (and is given substantial weight in our analysis) is because the police only record a fraction of the crime and disorder and nuisance that takes place in any area. The reasons for this is that only a small proportion of incidents is actually reported by the public or seen by the police. We know most incidents are not reported (the % varies on a crime-by-crime basis).
29. Our observations were written up immediately and are drawn upon in the *Findings* chapter, where relevant.

4.6 Photographic evidence

30. We also took pictures of any insightful observations. These are shown in the appendices.

4.7 Best practice and precedent

31. We also bring our knowledge of best practice in licensing policy development, managing street drinking and the night-time economy to our conclusions. We go beyond the licensing context where we recommend actions that could generally improve the quality of the town centre experience for all users.

4.8 Document review

32. In addition to those stages above we also reviewed the following documents:
 - a. The current Bedford Licensing Policy
 - b. The Bedfordshire Police's presentation at the Licensing Committee meeting of 21st September 2017.

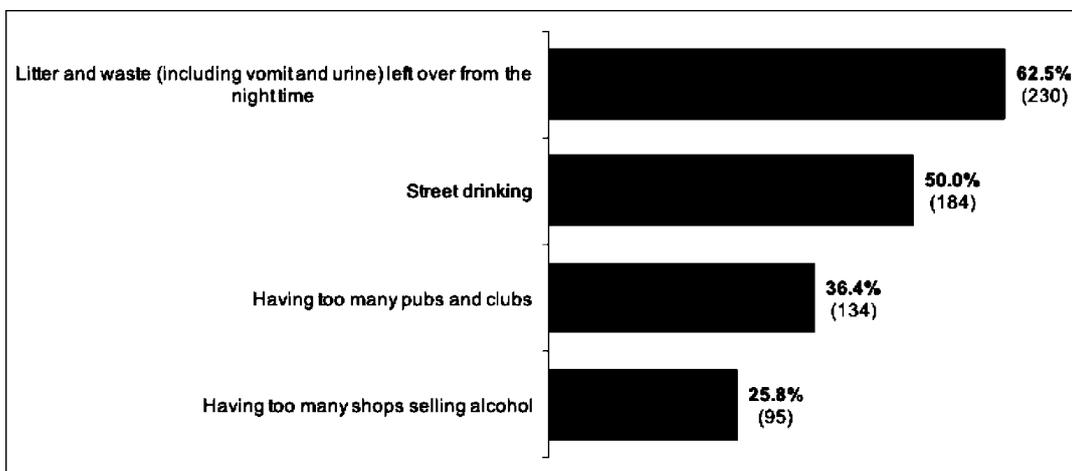
5 FINDINGS: Council licensing survey

5.1.2 Background

33. The council undertook paper and online surveys with residents about licensing between December 2016 and January 2017. It was a well prepared and executed survey campaign with a questionnaire that was both unbiased and allowed residents considerable freedom to express their views.
34. It wasn't a wholly randomised survey though. This was because some of the surveys were sent to existing mailing lists and were promoted via Twitter which, to some extent, influences who responds. But given the similarity of the results to the Bedford Community Safety Survey (see below) and our own survey, we can be confident that they are broadly representative of community opinion on the issues of licensing and safety.
35. The council received 368 completions. 79 (or 21%) of these were from residents who lived in the 'area of concern' (this area was targeted with follow up surveys to boost the number in this zone). The remaining 289 were from residents who live in the outer suburbs of the town centre or from the rural areas of the borough.
36. This is a high return rate and 368 is almost statistically significant to the research industry standard +/- 5% accuracy at a confidence interval of 95%. In short, the sample is robust.
37. It is important to note here that even though the council was initially disappointed with the number of responses, in our experience of working with many councils on licensing research across the country, Bedford's commitment to engaging with the community and the quality of the response is amongst the most proactive approaches we have seen. In turn, this has produced some of the most useful data on residents' views on licensing so far.
38. Below we extract some of the results to the questions asked by the council.

5.1.3 Problems related to licensing and users of alcohol in the town centres

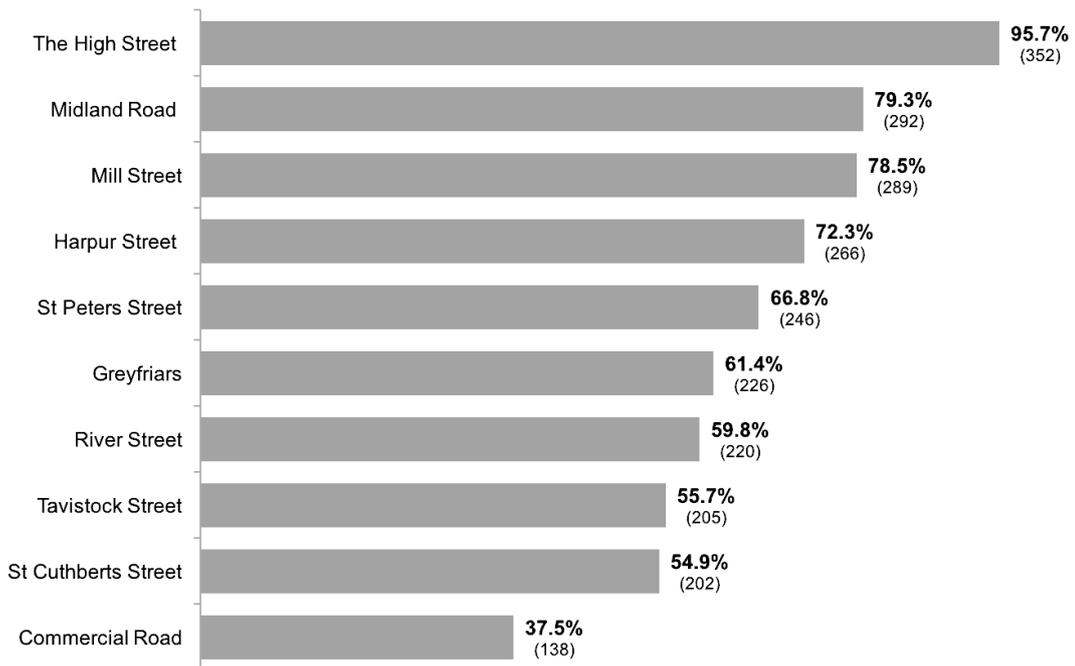
Figure 1. Do you believe that any of the following are a problem for Bedford Town Centre?



39. **Litter, vomit and urine** from the night-time economy is the primary problem for respondents with almost two-thirds of respondents saying this was a problem.
40. Interestingly, given that most of the respondents were *not* from the town centre, and that the council's town centre clean-up operation in the hours between the end of the night-time economy (5am) and the start of the 'retail day' (8am), is highly efficient (from our own observations), this suggests that residents have seen problems in the evening. They may also be conflating litter they see in the town during the day with this question.
41. Either way, the town simply isn't clean enough for many residents and, as our evidence shows, the night-time economy does have issues with the individuals it attracts, some of whom are vomiting and urinating and leaving fast food litter around (at times the High Street is in very poor condition as the result of some night-time economy customers' *public nuisance* behaviour).
42. It is also important to note that whilst littering and vomit are generally considered ASB, public place urination is a crime (albeit in most locations it is, wrongly, considered ASB).
43. Only just over a third of respondents felt that there were *too many pubs and clubs*. This is an interesting finding given that the vomit, urination and litter that two-thirds of residents say is a problem, comes from the customers of those venues.
44. This is particularly relevant as the number of late night venues has shrunk in Bedford town centre recently. For example, Vibe nightclub and bar HiFi had closed in the last two years before the research. This means there are *less* licences in the High Street NTE area than there have been in the recent past.
45. However, this raises an important point, and something that we return to in other sections of this report: there are many pubs in Bedford whose customers do *not* cause any problems whilst either on the premises (which would affect the premises licence) or in the public realm (cumulative impact).
46. These pubs usually attract an older demographic and close at 23:00hrs / midnight (occasionally 01:00hrs on Fridays and Saturdays).
47. However, there are a number of pubs in the High Street night-time economy area that now open until the early hours and it is highly likely that residents conflate the impact of these pubs with those of bars and clubs.
48. Indeed, as our observations showed, some customers from nearly every venue in the High Street area of the town that opened past midnight caused problems when they left the premises. This includes Empire, Yates's and Vogue, but also the Standard, the Rose and the Cross Keys albeit with less impact than customers of the larger venues.

49. At the larger venues, we observed (a minority) of their customers shouting and screaming, or staggering drunkenly as they walked along the High Street. Some of these venues also attract aggressive individuals who door supervisors must turn away. This is of course good practice but it can still constitute cumulative impact because if these venues weren't there, those individuals would not come into the area.
50. A conclusion from this question might therefore be that many residents aren't inherently against more licensed venues per se, but that they need to be of the type that doesn't attract those who create problems. That means that further alcohol-led vertical drinking venues that attract 18-25/30 year olds are therefore unwelcome.
51. **Street drinking** was a considerable issue for 50% of the residents surveyed.
52. This is an important finding. This is because, of those responding to the survey, only 21% lived in the 'area of concern'. As such, the other 29% (percentage points) of this 50% of respondents must see or experience the negatives of street drinking when they come into the town centre.
53. In other words, it's not just the most immediate residents that have concerns about street drinking but that other residents from outside the immediate area do as well. This is significant evidence that the town centre has a street drinking problem.
54. Given that 'only' 26% of the respondents felt that there were **too many shops selling alcohol** in the town centre, this means that some residents are not connecting the range of opportunities to purchase of alcohol with street drinking (and we know that virtually all street drinkers buy alcohol from mainly independently owned, off-licences).
55. This is not unreasoned. It is perfectly understandable for residents to want a choice of shops selling alcohol for their own purchase and consumption without having this curbed to restrict the supply to street drinkers.
56. However, there may also be another explanation. The town centre - as many people may define it in their heads - does not always include those areas where most of the off-licences are located. For example, in the questionnaire, respondents were asked which roads were included in their definition of the town centre. The results are shown below.

Figure 2. When talking about 'Bedford Town Centre' which of the following do you include in your definition?

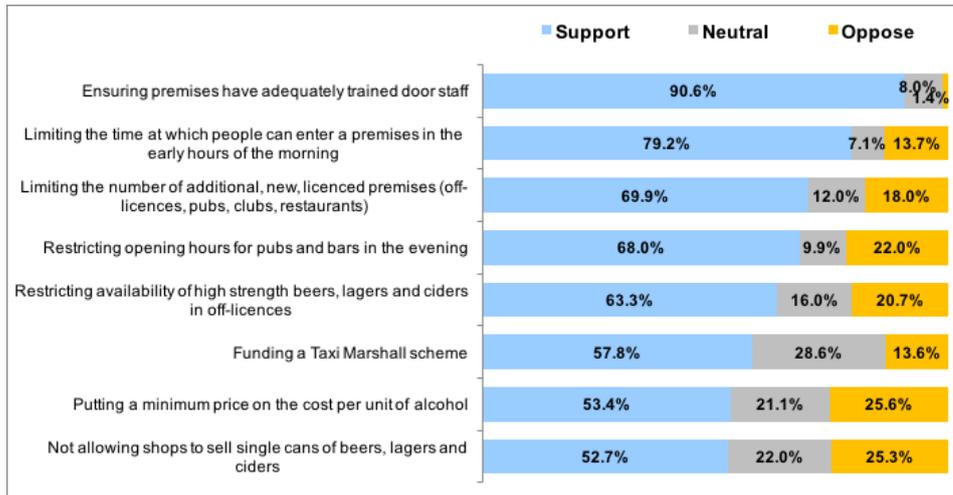


- 57. 79% of people include Midland Road in their definition of the town centre.
- 58. Only just over half (56%) of respondents said Tavistock Street was part of the town centre. Yet there is street drinking taking place here and several off-licences.
- 59. The town centre, as most people would probably define it, has very few off licences. There are exceptions such as Marks & Spencer, Tesco Metro and Lidl but these are supermarkets that happen to sell alcohol and are, as evidence in our previous work for Hounslow shows, not the vendors street drinkers typically buy alcohol from.
- 60. Thus, whilst Tavistock Street and Midland Road appear (from the other evidence sources in the research) to suffer from the negatives associated with street drinking and street drinkers, these are probably not included in most people's mental geography of what constitutes the town centre and this may be why some of the respondents did not feel there were too many off-licences in the town centre. But, obviously without further research cannot know exactly why they said this.

5.1.4 Residents’ support for possible policy solutions

61. Residents were then asked about their support for various policies that the council *might* be able to adopt to address those issues that residents considered to be a problem. The results are shown below.

Figure 3. Resident support for council pursuing following policies (all 368 responses)



5.1.4.1 Ensuring that premises have adequately door trained staff

62. This comes out as the public’s highest priority. This is unusual relative to our previous research. However, whilst all door supervisors must be SIA registered, this does not mean that they are ‘adequately trained’. It is a minimum not an aspiration. But it is hard to know if this comes from residents’ experience of door supervisors or just that they believe it is a good idea in practice.

63. Certainly, in our observational study we did not see any negative behaviour by door supervisor and that the behaviour we did observe was positive and best practice when dealing with difficult customers.

64. However, there is always room for improvement and one area that it would be worth the borough considering is Westminster’s Licensees Charter. This takes the licensee’s duty of care to the next level, not just for those inside the premises but for what happens to those individuals who are refused entry and who may be vulnerable as a result, e.g. being separated from their friends.

5.1.4.2 Limiting the time that people can enter premises in the early hours

65. This was broadly backed by residents, with 79% supporting. This can be controversial as it can be portrayed as a ‘curfew’. Perhaps the most famous examples of this policy are Glasgow and Sydney. Sydney has slightly relaxed its policy after it was widely seen to be the cause of the collapse of the city’s night-time economy since 2015.

66. What is the problem therefore with allowing people to enter after, say 1 or 2am? Well we assume that most of those moving between premises are intoxicated. This is certainly the case in all but a handful of exceptions in the High Street area, where people - through a combination of pre-loading and consumption on the premises - means that there is a huge amount of staggering, tripping up, shouting, play fighting. We describe these chaotic scenes in more detail in the chapter below based on our own observations.
67. Thus, because of the levels of intoxication of most town centre night-time economy visitors, there are several problems that may occur if last entry times are very late or do not exist.
- a. The first of these is that by simply having large numbers of people out on the street, this inevitably means that many are causing noise which is a *public nuisance* under the licensing objectives.
 - b. Secondly, a smaller minority might be causing criminal damage or getting into fights they might not otherwise have done. Whilst this may happen inside venues, these are much better controlled than public space and door supervisors are usually quick to intervene and call the police. This is not possible in the public realm and of course this then affects feelings of *public safety*.
 - c. Thirdly, there is more of a chance of intoxicated individuals becoming a victim of crime. For example, being knocked down by a speeding car. Now of course those individuals should be in control of themselves but there is a strong argument for minimizing the risk of harm. More seriously, and a growing problem according to Safe Space schemes interviewed as part of another piece of work undertaken by MAKE, is a rise in predatory males preying on and subjecting women in the night-time economy to sexual assault or rape. The more people are in a controlled environment the more chance there is of this behaviour being identified and potential offenders being disrupted.
 - d. Fourthly, when (particularly male) individuals have left one venue and have then tried to gain entry to another later opening venue, but are turned away by the door staff because they are too intoxicated, *some* of those individuals then become aggressive (we witnessed this in Bedford as we have in every other study we have undertaken).
68. So, whilst it is hard to imagine that the public fully understand the reasons for why, in certain instances, limiting later entry *could* help reduce *crime* such as violence and aggression as well as *public nuisance*, they instinctively seem to 'get it' and support it as a policy.
69. So, whilst each individual application for a premises licence must be treated on its own merits, there is no reason why the borough's licensing policy can't, as per Westminster's Core Hours Policy, suggest a typical last entry time (the evidence of our observation supports 00:00-0:100 when incidents rise considerably on the streets).

70. However, whilst limiting the time of the last entry seems like a common-sense dictum that everybody can sign up to, it can find resistance amongst licences (as was noted in the stakeholder groups we chaired).

5.1.4.3 Limiting the number of additional and new premise off licensed premises (off-licences, pubs, clubs and restaurants)

71. Residents also considered this a useful policy to address problems associated with the town centre's night-time economy. 70% said they agreed with this.
72. Overall, this question is basically asking whether the borough should bring in a cumulative impact policy (CIP).
73. However, we would suggest that if this had been broken down by type of premises (e.g. a separate answer for pubs, clubs, restaurants etc.) we would have seen different results. To this end we asked a similar version of the question in our own survey (see next section) to try and understand this further.
74. The reasons for doing this is important because different operational types of venues tend to have different impacts on the licensing objectives. For example, we know that nightclubs and late-night bars, as a group, have much higher incidences of violence associated with them than, for example, restaurants. This is also true for late night takeaways, which are often flashpoints for violence (something we observed in Bedford).

5.1.4.4 Restricting opening hours for pubs and bars in the evening

75. This gathered 68% support. However, this is a rather ambiguous question because what is 'evening'? And does it really just mean 'pubs and bars' or does it mean also nightclubs? We think this is too ambiguous to give credence to the answers.
76. Could it mean restricting bars and pubs back to their old hours of 23:00hrs and leaving nightclubs with 2am licences providing the post 23:00hrs entertainment. This would be both impossible under the licensing laws and against the spirit, but it may be something that the council could consider through the aforementioned 'core hours' approach.

5.1.4.5 Restricting the availability of high-strength beers, lagers and ciders in off-licences

77. This has become a popular 'policy' with many licensing authorities following its introduction by Ipswich. 63% of those residents surveyed in Bedford supported it. Albeit we need to be careful about the wording of 'restricting' because there are competition issues with this.
78. The idea behind this policy is of course that these are the products favoured by those with alcohol dependency issues, particularly high strength alcohol.

79. Sometimes the argument is made that those who have alcohol dependency will get hold of alcohol anyway. These products are certainly the drink of choice amongst most street drinkers.
80. However, because they are buying it on a can-by-can or bottle-by-bottle basis, and because these individuals are normally on low or 'no' incomes, then by restricting access to the highest unit of alcohol per pence products could conceivably help.
81. However, in terms of the problems residents see on their streets, then it is unlikely that this will reduce the number of street drinkers, mainly due to the complexity of their problems.
82. However, the possible advantage to residents of this type of policy is that by removing strong alcohols from sale the longer it takes for street drinkers to get drunk each day. This may result in those who tend to become aggressive taking longer to get to the stage at which this might happen. And, as we note below, the town does have an aggressive begging problem.
83. Such a policy may also help these individuals manage their addictions better, something that must also be at the core of a holistic approach to helping these vulnerable people.

5.1.4.6 Funding a taxi marshall scheme

84. This was ranked only sixth out of the eight options in the council survey with 58% of residents supporting it. This is a little surprising given the proven effect they have in reducing violence flashpoints in the competition for often scarce resources. There are also benefits to users of the night-time economy in that the marshalls aid in terms of cab-sharing and money saving. However, it may be that the public are unaware of this effectiveness.
85. We witnessed the taxi marshalls in action in Bedford and their presence certainly reduced pressure on these relatively scarce resources. Whilst there are three taxi firms around the High Street area they all have queues on Fridays and Saturdays between 02:00-hrs and 04:30hrs, sometimes with aggression displayed by those waiting in the queues. The removal of the taxi marshall would simply increase pressure on those resources and this would almost certainly be problematic from a *crime and disorder* reduction perspective.

5.1.4.7 Putting a minimum price on the cost per unit of alcohol

86. This is something that cannot be done by the council only by a national government. This was affirmed recently when the Supreme Court ruled in the Scottish government's favour in its fight against the Scotch Whisky Association to introduce minimum pricing.
87. Like the population nationally, more people favour this in Bedford (53%) than reject it, but it is not as strongly supported as some of the other interventions that are noted above. This is probably as it goes against some people's innate dislike of the state 'interfering' (as they would see it), in the market.

5.1.4.8 Not allowing shops to sell single cans of lager beers and ciders

88. This was the least popular of the options that the questionnaire put to residents. But overall, still more than half of respondents (53%) felt it would address the alcohol-related problems the town centre suffers from.
89. It is possible to put this on a licence as a condition (rather than as a blanket policy within the Statement of licensing policy) which would be unlawful.

5.1.4.9 Area of concern residents vs other residents

90. Whilst there were slight variations, there were no were statistically significant differences between those residents who live inside the 'area of concern' and those residents outside.

5.1.5 In residents' own words

91. In this type of survey, we have rarely seen as many verbatim 'qualitative' comments given by respondents when asked to clarify or expand upon their answers. This was particularly true of issues such as littering, vomit and urination as well as street drinking.
92. What is particularly revealing is how 'hyper-aware' many residents are of the problems associated with the licensed economy in their area and how specific they are about the times and locations of these problems.
93. Whilst it is easy to say, "*no more pubs*" or "*those urinating should be locked up*", many respondents were, for example, able to connect the presence of off-licence opening hours with problems in their street or neighbourhood and give quite detailed explanations of how they felt that problems were linked to existing premises, either individually or, cumulatively, in clusters.
94. It is important to note that whilst the distribution of the questionnaire was widespread, those who responded were mainly those who had experienced problems linked to customers of the town's licensed economy.
95. These comments fell into the following categories:
- a. Littering, vomiting urination
 - b. Street drinking and its associated problems
 - c. Number of pubs and clubs
96. The following section is quite long, but we feel that the comments are so valuable that a representative selection of them needed to be included in the report. Further, they still only represent a small sample of the thousands of comments given overall.

5.1.5.1 Littering, vomiting and urination

97. This was seen by those surveyed as the most significant problem linked to the licensed economy (and particularly the late-night economy), with **181 comments**. This was most noticeable from residents in and around the **High Street**, Mill Street and the residential roads to the east of here.

98. Typical comments included:

"[The] High Street is the main spot for nights out. [Here] people urinate, throw up on shops, stairs, leave rubbish everywhere - food, whatever. Honestly, it's an awful scenario every weekend for such a good [town]."

"[The] High Street is the main litter problem area, as is the riverside near [the] Park Inn. The... council [and] private car parks in Duck Mill Lane, which many town centre drinkers use for evening parking, are a litter eyesore and the food waste attracts vermin from the riverside area. Primarily the litter consists of fast food packaging. MacDonald's and KFC are a particular problem and there are no nearby litter bins... Vomit and urine in the High Street and nearby alleyways, including Castle Lane, is a common problem. Smoking areas outside pubs and restaurants do not provide ashtrays (for example those in Castle Lane) and smokers therefore throw their butts on the ground."

"Urine [is seen] regularly in Luddington's Passage and in the entrance to the Salvation Army shop [corner of Lurke Street / High Street]."

"The experience we have living at Castle Quay is that Ram Yard / Luddington's Passage is an absolute disgrace, not only with broken glass [but also] fast food containers."

"Some areas smell daily - where people have vomited or passed urine. This has been the case for many years in the alley from the High Street through to Lurke Street and from the High Street to Ram Yard. About six years ago the smell was not so bad, but in recent years it has deteriorated again."

"Around every nightclub [there is a urination and vomiting problem]. The cost to clear [it] up [is] funded by rate payers."

"I start work at 7am. When walking down Lime Street, the High Street, St Peter's Street and many other places in town I see vomit, urine or dropped food, especially the morning after student nights and at weekends."

"You walk down any side road or alley at your peril. To have a town with the reputation for litter, waste, vomit and urine is a disgrace. The many pubs may encourage mostly the young to the town centre of a night but such an aftermath is excluding every other generation. They are driven to go elsewhere."

“High Street... particularly near Phoenix Chambers archway [suffers from urination] as it is covered and out of direct sight from passers-by. Lots of bars and alcohol, [which is] very reminiscent of a ‘strip’ in Ibiza.”

99. However, it is not only the High Street, other streets suffer including **Midland Road** and

“Vomit [is also seen] very often on the intersection between Tavistock Street and De Parys Avenue.

“Midland Road and adjoining streets - frequently vomit on pavements and lots of beer cans and bottles on the street. I have discovered a lot in my front garden on Western Street dumped by drunks.”

“Awful smell of urine in shop doorways and in many alleyways, such as the one leading from Church Square to Midland Road.”

“I regularly walk my dog along Midland Road and there are lots of chicken bones, litter from food wrappers, bodily fluids which are unpleasant and dangerous for my dog too. This also spills into side roads where people retreat to eat and be ill.”

Tavistock Street is also mentioned by residents as sources of alcohol-related / street drinking grime and detritus.

“Tavistock Street, late night drinkers going to takeaways.”

Also, the **riverbank**

“The river...should be the jewel in Bedford's crown, not an eyesore.”

“The river bank in general and under the bridges in particular [suffers from street drinking mess].”

“This...is to a level never before] seen. This year so far [we] have had people (male and female) urinating - and worse - outside of house on the riverside. In the summer, it was a daily occurrence, some days [it was] 10 times a day.”

However, there is recognition that the council is clearing up the worst of the street drinking and night-time economy detritus:

“Have to get used to avoiding it. Although [the] council do appear to clean the area.”

“Overall this gets cleaned up very well but you can always tell when the cleaners have been working the night before – it makes a major difference”

“Unfortunately, one can often see evidence of vomit and urine in the back streets and doorways. On the whole, I think that litter is very well managed in the town centre.”

5.1.5.2 Street drinking and its associated problems

100. There were **150 specific comments** from respondents about where and why street drinking is a problem in Bedford. They are very specific about who is causing the problem and where in the **town centre** this is at its worst. The following quote sums up the mode of street drinking and its extent:

“It is common to see men (usually) drinking from cans of 'extra strong' beer either seated in the area around Harpur Centre or increasingly while walking (Riverside, High Street). This happens in the daytime as much as in the evenings. The can is thrown on the floor afterwards. In warmer weather street drinkers congregate at Castle Mound, near The Higgins and on the Riverside near Bedford College. The public benches outside the Harpur Centre are often occupied by street drinkers in summer.”

101. The **town centre**, whilst not the most frequently cited location (see Midland Road below), does suffer from street drinking in the experiences of many residents (and which is supported by our own research).

“This is because people sleep rough in doorways and make the shop doorways dirty. These people drink [and use] drugs but [the shops] need shutters [because this is where] they sit beg.”

“Cans and bottles, carefully placed on floor or walls, instead of public receptacles that are amply provided in the area. Re waste: public urination, which seems to be mainly committed by street drinkers, against walls, in corners of walls along streets and in street planters.”

“The length of the High Street from St Peter's to St Paul's [is affected by street drinking]. It is not a good example for residents/visitors.”

“The visible impact of the hardened street drinkers makes those using the Town Centre feel unsafe. Some areas of the Town Centre are not used by residents / visitors] because of this.”

“At the end of De Pary's Avenue, close to the church I saw a few times that people drink there and [are] quite aggressive to people passing by.”

“This [street drinking] is out of control in my opinion, there isn't a day living in Bedford I don't see people walking in the 'No Drinking Zone'¹ whilst drinking alcohol. It's not policed

¹ It is important to note that at present there is no 'No Drinking Zone'. This is a Designated Public Place Order (DPPO) which allows the police to remove alcohol from individuals if they suspect may go on to cause problems. It doesn't prevent people from drinking in the first place.

or enforced in any way. If we make a law it should be enforced, otherwise it just isn't worth the time of creating!"

102. **Midland Road** is the town's major hotspot for street drinking and associated problems, as well as some likely drug dealing. This is supported by our own observational research and statistics produced by the community safety team and the police.

"We are affected by constant anti-social behaviour from [street drinkers]. They [street drinkers] group and make lots of noise, [use] foul language and urinate [in] Maitland Street and Battison Street... People all the time throw alcohol cans and bottles in our back garden and on one occasion a brick was thrown and [just] missed my child while playing in the back garden. It's a dangerous place to live in around [the] Maitland Street area."

"Midland Road. They congregate in groups blocking walking on the pavements, and it feels very intimidating walking past. If they are drinking you know they can be unpredictable. Living off Midland Road means the drinkers gather in groups, are noisy and urinate and defalcate in your drive/garden. I also come across them passed out on the pavement, or ill. This again is worrying as helping them can be dangerous."

"My dentist is at the far end of Midland Road - there are often groups of frightening looking people gathered in front of it or nearby and they are holding cans [of alcohol]."

"I see this on the outskirts of town centre and people begging for money to go and buy some more alcohol especially in the mornings on Midland Rd and Bromham Rd."

"Midland Road is a terrible [example] for people visiting the town by train - coming across drinkers and drug dealing."

"The alleyways off the roads between Midland Road & Commercial Road. Some street drinkers litter, urinate and fail to pick up their dog foul. I've also caught people drinking in the private alley between my house & my neighbours more than once."

"Midland Road and all roads leading off this [are a problem] – [there are] dirty aggressive loud people hanging around."

"There are loads of street drinking down Midland Road and most of the street drinkers are constantly trying to pick fights. They also beg for money."

103. The **Riverside** is also a problem location for street drinking, particularly near the rowing club and Prebend Street. This is, from our observations, linked to street drinkers from Midland Road who, having purchased alcohol, are looking for a less public and more conducive location in which to drink it. This is particularly prevalent during the day.

"[Street drinking is] especially [frequent] by [the] Star Rowing Club (outside where I live)."

“The Embankment in front of Sovereigns Quay and Heron Quay [is a key location for street drinkers].”

“Daytime drinkers drink along the Embankment between the Star Rowing Club and the Prebend Street bridge, despite the signage stating that it is an ‘alcohol-free zone’.”

“Along the riverside, under Prebend Street bridge during the daytime [is a street drinking hotspot].”

“Under the Prebend Street bridge to the circular footbridge over railway along the river [is a hotspot for street drinking, as well as] urinating, [leaving] rubbish, people being drunk/drugged. [It’s] the same people getting in the way or being intimidating during the day.”

“People drinking alcohol is a constant sign in Bedford. Even [in the] early morning around the river groups of people are standing or walking drinking from cans of beer.”

104. Also, **Tavistock Street, St Peter’s Green and De Pary’s Avenue** are noted by many residents as a hotspot for street drinkers spending large amounts of time and their potential for aggressive behaviour. This concurs with our own observations.

“[I see street drinking taking place] predominantly in areas outside of the town centre, e.g. [the] Tavistock Street area and surrounding, mainly residential areas.”

“Tavistock Street [is a hotspot for street drinking]. I have nearly been hit by a can thrown from the YMCA! [Also, the] children’s home at... Warwick Avenue. [I’ve seen] children drinking bottles of vodka!”

“On the green in front of St Peter’s Church [is a street drinking hotspot]. This is part of the ‘alcohol-free zone’, however there has been no attempt to enforce this policy. Drinking in this area has now become a permanent feature. [It is] indirectly supported by the church in allowing drinkers to use the church doorway when the weather is unfavourable. The issue is further compounded by drinkers urinating in the churchyard in clear sight of both the public footpath and Bedford School.”

“At the end of De Pary’s Avenue, close to the church [is a street drinking hotspot]. I saw a few times that people drink there and [are] quite aggressive to people passing by.”

“In the Tavistock Street area, you can often see people wandering along carrying cans of lager. It can be intimidating to be confronted by someone who has been drinking, and to be asked for change.”

“St Peter’s Gardens are often frequented by alcoholics, making it intimidating to walk by. The same applies to the riverside between the Star Rowing Club and Prebend Street. Excessive drinking makes people aggressive.”

105. One of the most frequently cited concerns was that lack of enforcement of the town's widespread DPPO or what residents often call "no drinking zone". As we noted previously this is not a 'no drinking zone' and as such the concept has probably been poorly communicated to residents. However, the council is currently using more recent legislation (public space protection order) to introduce something that will more closely resemble what residents clearly would like.

"Without due enforcement, the law becomes irrelevant."

"There is blatant [street] drinking [in the town centre] during the day and night where the consumption of alcohol is not allowed."

"I thought this [town centre] was already a no open bottle zone, but it's not enforced."

"[Street drinking] should be banned all the time and policed very well."

"The notices banning drink from these areas [in the town centre] are useless without being policed. They are just ignored."

"[Street drinking is a] constant problem, regardless of bylaws put in place. It is an issue that is not tackled by the council and always left to the police that do not have the resources available to do this. It is not fair to leave this to the police."

106. Not all respondents felt the policy and approach to enforcing street drinking-related issues was ineffective, but they were very much in the minority:

"The problem has been worse within the town centre, but is much improved with the by-law prohibiting street drinking."

5.1.5.3 Too many pubs and clubs

107. There were **103 responses** that could be categorised under the heading that there were too many pubs and clubs in Bedford town centre. These could be classified into the following themes.

108. **Too many pubs and clubs leads to an alcohol-dominated night-time economy.** Several respondents felt that Bedford currently suffered from a 'homogenous' or one-dimensional evening and, particularly, night-time offer; a post-5pm centre that only appealed only to alcohol seeking young people. Typical quotes were:

"The [venues located] length of the High Street - from St Peter's to St Paul's - attracts too many of the same age group."

"There are too many clubs [and] drinking places in close proximity of the High Street."

"What else is there in the High Street?"

“At the weekends, especially, the town centre is crowded with rowdy people and this detracts from the peaceful use of the area.”

“[The pubs and clubs are] all so close together.”

[The pubs and club are] mainly in the High Street. It is reminiscent of a ‘strip’ in Ibiza!”

109. Pubs and clubs deterring a more diverse user-base. The result of this alcohol domination of the town’s evening and night time economy (in the eyes of many of the residents who responded to the survey) means that they (and others they knew) felt deterred from using the town centre ‘after dark’.

“On any occasion when I eat out in Bedford there are far too many intoxicated people in the town centre.”

“[The concentration of pubs and clubs] encourages people to drink to excess and cause disturbances, mostly in the town centre.”

“I do not drive down the High Street on Friday or Saturday late [in the] evening as I no longer feel safe [due to the concentration of pubs and clubs and presumably intoxicated individuals].”

“The High Street and Mill Street are really a no-go area after hours, unless [you’re] interested in heavy drinking and the society of that.”

“The town can become something of a no-go area for older people in the evening [due to the concentration of pubs and clubs and their customers].”

“The High Street has far too many pubs and the sight of people drinking as you walk past on the pavement deters you from coming in to town.”

“[There is] too much drunken behaviour, especially on Friday/Saturday nights [from the users of the large number of pubs and clubs]. This stops others from visiting the town.”

“Both St Peters and the High Street [have too many pubs and clubs]. [The] area should be suitable for families in the evening and not just pub crawlers.”

“The pubs and nightclubs around Bedford force the sober tourist and café society away... The number of clubs means that the streets are full of rowdy drunks moving from one to the other and picking fights at taxi ranks.”

“Like many UK towns, the extension of drinking hours and irresponsible drinking has led to town centres becoming unpleasant locations unsuitable for families and older people in the evenings and at night.”

“[The presence of so many pubs and clubs] steers [the town centre] towards alcohol in preference to everything else. Of a weekend, we therefore avoid walking through here at all costs.”

“On the high street. I think we need to have access to a wider variety of evening entertainment, not just drinking!”

110. **Smoking areas and intimidating intoxicated smokers outside premises** was an unusual issue that we had not seen in other towns and cities (although drinkers on pavements is a common problem country-wide).

“The High Street: how many [pubs, bars and clubs] are there? There must be close to 10. People sit out [smoking] virtually on the pavement. It does not give the High Street a great feel. Some of the pubs blast out disco music even in the day time.”

“Drunks spilling out onto the streets...as early as 5.30pm. It does make walking home a little intimidating.”

“There are too many youngsters hanging about waiting to go into clubs. [It’s] intimidating for older people.”

111. **Keeping people up at night.** This is a major issue for most residents in and around intense night-time economies and the respondents to the survey in Bedford appear no different. We observed individuals in apartments above the High Street closing their windows when the noise from sound system leakage and from the shouting and screaming of clubbers became too much.

112. This tends to affect both those directly above licensed premises and, to a lesser extent, those who live on arterial routes in and out of a town or city.

“Loud music coming out from the clubs three or four times a week, makes [it] impossible to sleep.”

“It [the dispersal from the night-time economy] causes crowd problems and hence [it is hard] to control...the streets. It means noisy late nights for people, living in the town centre on Friday and Saturday...and more and more flats are being built or buildings converted into flats. Bedford is a lovely town spoilt at the weekend by late noise and trouble after 11pm.”

“The trend is for the clubbers to drink at home prior to going to the bars, thus avoiding the high cost of buying alcohol in the pubs [and] clubs. This means the youth of Bedford come into the town at about 11:30pm and the roads and people on the streets can be very noisy when the people who live in the town centre need to sleep! There is often disruption particularly at weekends until 3 to 4am the next morning. As more people are living in the town centre this is becoming a big problem.”

113. **Maintaining management standards** wasn't a frequent observation of the respondents responding to the issue of whether there were too many pubs and clubs, but one respondent did perceptively raise the issue that competition can be problematic in a night-time economy.

"Around [the] High Street and adjoining roads. I suspect the intense competition for clients means proprietors are less likely to enforce rigorous behaviour standards, including refusing to serve those who are [or who appear to be] drunk."

114. **Disproportionate use of police resources** is, in our experience, a frequent complaint from outer lying residents who believe there are too many licensed premises in the centre of a town or city requiring their time. This was also of concern to Bedford residents who completed the survey.

"Too many police hours [are] taken up with drunken behaviour."

"Friday and Saturday (and probably on other) nights police resources are required to keep order [in the High Street area]. [Yet there are] many instances of criminal and anti-social behaviour [which] occur outside of these[central] areas in the Bedford [and] which are... exacerbated by [police being required to address] the problems in the streets mentioned above."

"The fact that there are police cars [and] ambulances parked on Silver Street on a Saturday night indicates that there is a significant problem with people drinking in [the] High Street pubs and clubs. The customers spill out onto the...street and make it a place that ordinary residents don't want to go. The only people attracted to Bedford on a Saturday night are ones who want to get completely trolleyed."

"Excessive sales of alcohol, cheap sales [and] late nights [require considerable police time]. Each club should pay a levy to pay for extra police."

5.1.5.4 Too many shops selling alcohol

115. There were **70 specific quotes** from those respondents who felt there were too many shops in Bedford town centre selling alcohol. We present some typical examples, as well as comments that are unusually insightful below.

116. These fell into three main categories. The largest number of comments was about **Midland Road** and the concentration of off-licences located there and the resulting congregations of street drinkers and anti-social behaviour. There are also homeless / rough sleeping support services in the area and one respondent suggested that this co-location of a high number of off-licences and these facilities may be connected.

"Midland Road [contains] a concentration of off-licences selling cans and bottles at low prices; competition results in lower prices than other areas of Bedford, thereby attracting those dependent on alcohol to visit the area to purchase, and, usually, to congregate and

loiter, drinking in groups, despite the public notices stating, 'Alcohol-free Zone'. Individuals remain in the area, drinking, and some begging."

"[There is a lot of] anti-social behaviour and drunkards easily get alcohol from too many licensed shops in [the] Midland Road area. The council should reduce licensed retail operators so that drunkards cannot buy alcohol easily."

"Midland Road is overflowing with places to purchase alcohol and there are often groups of people congregating in the area."

"[In my] local newsagent every morning [I] see people buying cans of Special Brew."

"They [encourage] people to buy alcohol and most of the homeless are sitting there just to get cash and expend money on alcohol."

"The homeless and drunk are the biggest issue in our eyes. Numbers have increased this year, and 90% of them are seen drunk and with alcohol. It needs to be cracked down. We live on the High Street and sometimes feel scared entering [the town] due to them."

"[The] Midland Road area in particular has many shops selling the extra-strong east European beers beloved of street drinkers at cut prices. There is no need for so many competing outlets in a small area. If a number alcohol licences are not withdrawn, existing outlets should have their trading hours for alcohol sales curtailed and possibly restrictions placed on the strength of alcohol products on sale."

"in general, Bedford's rough sleepers often have an alcohol problem, which easy access to alcohol does not help. I suspect the intense competition for clients means proprietors are less likely to enforce rigorous behaviour standards, including refusing to serve those who are [or] appear drunk."

"[There are] 15 convenience stores on Midland Road. Do we really need that many? It provides...access points for street drinkers and if one shop acts responsibly they can try others who don't."²

"Shops [that are very close to each other] are being given licences. This is not necessary and is just creating more opportunity for on-street drinking, which is still happening and is not being monitored. [For example, in] Brereton Road there seems to be a new drinking group set up [who] sit on the wall outside what used to be the old registry office - this is not conducive to attracting people to Bedford, nor is it pleasant for residents. There are no visible signs of this being controlled by the police."

² There are four off-licences on the central section of Midland Road between Bridge Street and two on the western section between the roundabouts at Rutland Road and Ashburnham Road (six in total). There is also the Tesco Metro on the pedestrianised section of Midland Road that heads east into the town centre.

“The issue is the people buying the alcohol and the policing of this. We live on the river and it has been a horrific year for drinking outside our house - night and day. We have lived here for 10 years and have called the police probably [once] in nine of [those] years. This year it was almost daily through the summer and horrible: the litter, language, scene etc. This all happened under a ‘no drinking zone’ sign and the police at the time had a carefree attitude to it.”

“[There are] too many shops selling alcohol in [the] Midland Road area, which is located amongst accommodation specifically for those dealing with addictions.”

117. The **second** theme to emerge from respondents was that they felt they had observed shops selling to underage drinkers. This is hard to prove as the residents are not test purchasing in these outlets with under age volunteers (as trading standards would do), so it is speculation. We also did not observe any individuals who appeared to be underage purchasing or proxy purchasing alcohol from off-licences in the town. However, these comments should still be taken seriously by the police and the licensing authority.

“Less scrupulous shops appear to sell alcohol to underage drinkers.”

“The small shops that sell alcohol do not enforce the age limits and will sell to already inebriated people.”

“I feel this is an issue mostly for the Tavistock Street area. Whilst I do not think that all traders are lax in their policy of selling alcohol to those who are under the legal age limit it is here that I have witnessed street drinking in the evening [and at] night and whilst I cannot claim to have been a victim of any offence due to this, it is very intimidating for me - mostly because of my age and that I may appear vulnerable.”

118. **Thirdly**, there were a small number of comments that address issues such as the impact on the reputation of a neighbourhood if there are too many off-licences, some of whose customers are not well-behaved, as well as a perceived lack resources to enforce the laws those prevent those shops from mis-selling alcohol:

“Many shops have appeared over recent years within the town centre...that offer alcohol as part of their wares. If too many of these shops open in a certain area they may lead to problems with the perceived desirability or reputation of the area that can have a knock-on effect upon other businesses and residents. Also, the more shops that sell alcohol, the harder it becomes to effectively police licence conditions, particularly with the ongoing cuts to public funding.”

“Midland Road. It is ridiculous that the burden of proof is on residents to show that more off-licences will be detrimental, when street drinking in the area is [already] out of control. [It’s also] now more threatening due to the reduced street lighting from the new street lights: it’s a very threatening part of town now.”

"[It's] too easy for people to obtain alcohol at any time e.g. usually only a short walk away. This] leads to alcohol being an everyday thing in people's lives, leads to lower price competition between retailers, leads to increased intake and increased nuisance to neighbours."

*"The more shops that sell alcohol, the more revenue they take from the pubs."*³

119. Only one respondent who expressed an opinion felt that it wasn't necessarily the concentration of premises, but the enforcement of the law that was at the core of the problems noted in areas such as Midland Road:

"This is only a problem when businesses are selling to the wrong people - underage, already drunk etc."

5.1.5.5 Making the town safer

120. The council's survey with residents concludes with a question about what can be done to make the town safer and other improvements.

121. Most answers focus on the issues covered above, such as addressing street drinking and aggressive begging, enhancing CCTV, limiting the opening hours of pubs / bars / clubs, and off-licences and making venues pay for policing.

122. Crucially, for many residents, enforcing the 'no drinking zone' was important, as was tackling aggressive begging. And, as with any questionnaire about safety, the most frequent answer was along the lines of *"Bedford town centre needs more visible police"*.

123. However, there were several new points that residents raised that are worth highlighting, not just from a licensing review perspective but also from a broader agenda of town centre improvement.

124. **Toilets** are a national issue which respondents Bedford have also picked up on:

"Have more public toilets outside the Harpur Centre area, open later."

"24/7 toilet facilities on the High Street."

125. Street cleansing was repeatedly noted by respondents as an area that the licensed economy not only impacts negatively on, but an area that can be improved. Our observations (see later) suggest that overall cleansing is solid during the day, although on the busiest days it can be

³ This cannot directly be considered a licensing or cumulative impact issue, but there is academic evidence that from a sustainability and public health / crime perspective that people do become more intoxicated when drinking at home because they are unsupervised and are known to pour themselves larger measures of alcoholic drinks than they would receive in an on-premise such as a pub or bar.

overwhelmed. But at night, and even from the early evening, as residents are aware, there is considerable litter. This is mainly takeaway detritus but also pre-loading bottles and cans at a time when there is no cleansing. This is perhaps something the town may wish to introduce.

"[Bedford's] street litter pickers seemed to have disappeared from [the] town centre?"

"[The borough should introduce] on the spot fines for urination!"

"Remove all [the] wheelie bins that should not be on [the street]. The reason for this is [because] angry [intoxicated] people like to tip them over."

126. Linked to the issue of street drinking rough sleepers, a small number of residents referenced the **banning the sale of single units of high strength beers and ciders**.

"Do not allow the sale of single cans of high strength lager / cider by off-licences in certain areas (Midland Road, Tavistock Street, High Street, London Road). Ensure that those who are caught in 'no drinking zones' have their alcohol removed and are taken to Pathway to Recovery for support."

127. **Pedestrianising the High Street** was an intervention which several respondents mentioned.

The motivation behind this was mainly around avoiding accidents involving drunk clubbers. Indeed, many other locations have installed temporary night-time economy pedestrianisation schemes to cope with large numbers of socialisers, some highly intoxicated and seen accident reduction outcomes.

128. However, there are also other benefits of pedestrianisation, such as relieving pressure on pavements and in turn reducing flashpoints and fights.

"Make the High Street [a] pedestrian-only zone after 8pm."

"The main safety issue in Bedford town centre is traffic in the High Street and to a lesser extent in the other streets, injuring pedestrians. This affects High Street...and is also related to late night drinking. [As a nurse] I see that there are 'after pub or club closing time' peaks. [For example] 8 of [an average of] 15 casualties from 11pm until 4am [in my hospital] involve drunk pedestrians. Most of these casualties are from the south [end] of [the] High Street and St Paul's Square. I would therefore suggest that there is a night time ban on motorised vehicles using High Street on Friday and Saturday nights between 10pm and 2am. This would make it safer for all users."

"Pedestrianise the High Street on Friday and Saturday nights (example 9pm to 4am). Possible exceptions [could be] made for taxis and private hire vehicles."

"While difficult, [the] High Street should be pedestrianised and incentives given to small businesses to improve atmosphere."

“The High Street needs to be de-trafficked and returned to pedestrians. [Without this] it means that Bedford is a less attractive town to shop in, compared to other similar towns, which enhance their historic shopping streets.”

“The High Street [is dangerous at night]. Widen pavements and create a single lane of traffic.”

5.1.5.6 Agent of change

129. One area that is increasingly of relevance is the impact of the licensed economy on residential development and vice versa. This is known in planning terms as ‘agent of change’ principle. The Mayor of London has included it in his consultative London Plan and it is, at the time of writing, being debated in the House of Commons. It was noted by several residents as an area of possible conflict.

“It is not fair to mix drinking premises with residential properties - in particular if you are going to approve late night opening. Premises that are to be allowed this should be very selective - by means of licences issued by the Council.”

“Also, increasingly successful town centres seem to have more restaurants than shops e.g. St Albans. [This is because] less shops [are] needed. Also make it [would make the town centre] feel safer if there were more upmarket flats in the town centre, e.g. convert empty shops as residences as...residents would call [the police] for help.”

5.1.5.7 Individual premise problems

130. Whilst noise from individual premises is an issue for individual enforcement rather than one of cumulative impact, it is still an area that some residents felt the council should be doing more to address.

“The level of noise from [the] nightclub (Empire) is a problem. The nightclubs are too loud. Especially Empire. I can hear it in Castle Quay like music is playing in my flat. I'd really appreciate if the volume is reduced or there is an order not to go above the level of volume which is heard outside the club.”

“My main issue stems from the music levels from the Cross Keys pub on the corner of the High Street and Mill Street. Frequently I can hear the lyrics of the music! Apart from that I suffer little issues beyond what I expect for choosing to live in the town centre.”

“I would prefer if music from venues was not audible on the street, there are at least two in the High Street area [where this is the case].”

5.1.5.8 Diversification

131. Increasingly licensing policy is being seen as an important way of achieving greater diversity in town centres. Many residents surveyed by the council understood this.

“Encourage more cafes to open in the evening to allow a mix of people rather than be dominated by gangs of people. Encourage families and tourists with family style restaurants and events, make them central, not hidden down alleys and move the drinking clubs to one area rather than spread all over the town. Increase a visible police presence.”

“I'd like to see a bias towards restaurants/cafes in planning, rather than more nightclubs. Not straight forward, I know.”

“Having car parks open later to encourage more people into town to eat. More people would mean younger generation would not be the overwhelmingly largest group.”

“Providing different types of entertainment... bowling, cinema, eating out, theatre, shows etc. Not just drinking places.”

“The majority of pubs and clubs in the town centre are no-go areas for me personally, but it would be nice if that could change. Meatcure, Oh You Pretty Things, Brewhouse Kitchen and the reopened Bear are the only decent places. It's lovely that one end of the High Street is acquiring a bit of class, I hope it spreads.”

5.1.5.9 Lighting

132. Whilst not a licensing issue per se, lighting was considered by residents as an area the town centre needed to improve, both for safety and for the quality of the town's leisure experience.

“Better lighting e.g. behind the rowing club it's really dark.”

“[We need] more cameras and better lighting of alleyways.”

“Clean and light some of the alleyways.”

“More street lights [are needed] down Brereton Road. The new lights that have been put in place are not as effective as the old versions - these just concentrate light in a smaller area whereas the old ones shed light around a much greater area. Also, one side of the street has two lamp posts and the other (my side) only has one, which is not enough and needs to be looked into as it creates lots of very dark spots, which I find unsafe.”

“It's scary to walk through the shopping area at night, though well lit.”

5.1.5.10 Transport

133. Although also not a licensing issue, some residents identified that transport was important to the sustainability of the town centre, particularly in bringing in a more diverse set of users.

“I am always pleasantly surprised by how safe Bedford Town Centre is in general, even during the late/early hours. The key is to ensure that there are safe and reasonably priced transportation links at the necessary times to ship the visitors in and out. Perhaps some key sign posts of facilities would help e.g. to taxi rank. Also, a town map?”

“Walking from the station at night does not feel particularly safe for lone women. The park and ride operating from the station [later] would be helpful to save walking across town to pick the bus up.”

“Later operating [of the] park and ride would also encourage more people into town. More people makes it feel safer. Security staff in car parks would make them feel safer at night/when dark.”

5.1.5.11 Management and partnership

134. Given that it is often hidden, there was a surprising amount of recognition and understanding of the importance of partnership around licensing, the town centre’s management and night-time economy. In particular, some residents were effectively describing the need for a ‘safe space’, as these schemes have become known.

“Continue to support the Bed:Safe initiative and target problem venues more aggressively.”

“The Bed:Safe initiative is good.”

“I have seen door security refuse admission to people who are clearly drunk and potential trouble which is a positive step.”

“The only way I feel safe is if there are police / door staff / security monitoring and safe taxi options. Taxi marshalling is a great idea.”

“A mobile drunk tank for Fridays and Saturdays should be used.”

“[Perhaps we need] an ambulance [present on the street] as well as police. [This] would help as there are always a small minority who need help, however good their intentions at the start of the evening. This is almost a social care issue and something the council should be looking to improve rather than ignore.”

“More Street Angels. A place (during the evening, in the town centre) where people can receive advice about their drinking, attention if they are too drunk, have an injury that doesn't require A & E support for street drinkers. Places for street drinkers to go and receive health support.”

“Encourage and support Bedford Street Angels.”

“I think simple, good policing and responsible pub management should do [the] job (and doing things like counselling those who are already drunk to head home). Some pubs (like the Pilgrim’s Progress) already seem quite good at this.”

“I feel you [Bedford Borough Council] are doing a good job. [There is also a] very good police presence on the High Street over the weekend / evenings.”

5.1.5.12 Paying for pollution

135. Whilst the Late-Night Levy has not been used nationally in a widespread manner, many high-profile authorities have gone down this road (e.g. Newcastle, Liverpool, Tower Hamlets). Obviously, the licensed trade is very much against it, but it is possible to use it as a last resort ‘stick’ whilst also offering the ‘carrot’ of partnership and dialogue first. One resident wrote eloquently of their belief that the “polluter should pay”.

“Use powers to impose a late-night levy to ensure adequate number of police officers on duty when required. The night-time economy promotes consumption of alcohol, but excessive consumption can cause disturbances, unruly behaviour violence and crime. It is just and equitable that the 'cause finds a solution'”

I understand that football clubs pay towards policing of matches [NB this applies to inside grounds only] - the night-time economy is a parallel situation. At the moment neither the general public nor the night-time economy gets an adequate policing capacity. Such a levy would cause the night-time economy to bear its fair share of the direct cost of its activities, and it would factor them into its business model.

The objections publicised by the licensees are to be expected when a possible increase in operating costs is aired, but the costs to the public purse, and the detrimental effect upon policing the remainder of the population are blithely ignored by them.”

5.1.5.13 Supporting pubs and clubs

136. Whilst the resident above was clearly in favour of the Late-Night Levy, others also noted the importance of supporting the licensed economy.

“Pubs are not an issue for Bedford Town Centre. The issues lie within the landlords of the empty units around town that are charging very high rates putting people off opening shops, meaning we look like a deserted wasteland. If you start attacking the pubs and clubs then they will have to close also. So, what would become of Bedford?”

“Although having [the] view that less drinking would improve so many aspects of our town and society in general, I believe that there should be a balance between the retention of places for responsible drinking and the establishment of good restaurants within environments that people of all ages and ethnic groups can meet together and enjoy each other’s company.”

5.1.5.14 “It’s all fine”

137. There were also a small minority of residents who genuinely didn’t appear to have any issues with any aspect of the town centre’s licensed economy and were quick to praise the town, its facilities and the authorities.

“I have not personally experienced any dangerous situations in the town centre. I do not get the impression that there is a pressing need to address the issue, if one exists.”

“I enjoy going out in Bedford but only when I feel safe - it's definitely about striking a balance working with young people [and] not treating them as a problem.”

“It's generally a nice place to live and I feel pretty safe.”

“It's coming on very well. Nice to see the High Street looking much better.”

“Bedford is by no means like the Wild West on weekends, and I feel pretty safe when visiting the town centre at night. Licensees should be respected for the very difficult job they perform and consideration given for subsidised training for them and staff including workshops etc. to spread best practice.”

“Bedford is a much safer place to go out than many larger towns and cities where violence is more common.”

“Bedford town centre is not an exceptionally unsafe place for most people...and the issues should not be exaggerated.”

“If you implement too many restrictions you will adversely affect businesses and it is personal responsibility that is lacking and should be encouraged.”

“It's not amazing, but it's better than many people think. Bedfordians do like having a moan - usually those who haven't lived anywhere else! Riverside North should help liven things up, though...Midland Road [east], Harpur Street, Silver Street seem too quiet at night... But even now there are some great restaurants, pubs and bars around the town centre, and excellent cultural venues like the Corn Exchange, Esquires, and the Quarry and (a bit further out) [the] Place Theatre.”

5.2 Summary

138. In short, many residents do experience considerable negative impact from street drinking and the night-time economy, but they also recognise the value of pubs, bars and restaurants to the town and rather than close it down, would generally like to see a shift towards a more sustainable and less alcohol-focused Bedford.

6 FINDINGS: MAKE resident interviews

6.1 Background

139. Because the council felt that it didn't have a sufficiently in-depth insight into the views of those who live on and near Midland Road, we undertook 100 surveys with residents who lived inside the 'area of concern'.
140. Half of these respondents lived on or near Midland Road. The remainder were split between the 'Castle Quarter' (the High Street, Ram Yard and Castle Lane) and Tavistock Street. Ultimately, this was an in-depth survey of those living in the town centre – the people best placed to provide detailed and meaningful insight into the way the town functions, is changing and the benefits and dis-benefits of living centrally in Bedford.
141. The participants were randomly approached in their neighbourhood and asked if they could spare 15 minutes to undertake the survey, usually in a community building or café where they could give better responses than if they were rushed in the street. Responses were captured on a tablet computer and analysed at a MAKE head office.
142. The respondent profile also broadly reflects the ethnic diversity of the borough.
143. The survey covered general use of the town centre, as well as asking about any issues they had with daytime street-drinking in their neighbourhood and the night-time economy. We also went further than this and asked some more specific questions to gain further insight into some issue that the council survey raised and to be a little more precise about certain areas of licensing interest.
144. In broad terms, the results validate the results of the council survey which is useful as this survey was of a more randomised nature and respondents less self-selecting.

6.2 Findings

6.2.1 Use of town centre facilities

145. We asked respondents what town centre facilities they had used in the last six months. This was important because for two reasons. Firstly, we wanted to know if town centre residents simply lived in the town centre and didn't engage in the evening and night-time economy. If this was the case then it wouldn't be a surprise if many of them saw a vibrant night-time economy as a problem. But, secondly, we were also interested in the services they used in terms and what might be missing from the town centre.

Figure 4. What facilities do respondents (and families) use in Bedford Town Centre at what times of day?

Activity	Day	Evening	Night	D/K	Not used
Traditional pubs	31	27	3	0	58
Bars & wine bars	12	25	8	0	70
Cafes	80	5	0	0	20
Nightclubs	0	8	8	0	90
Fine dining rest.	23	34	0	0	57
Family/chain/world rest.	38	25	0	0	49
Takeaways/fast food	17	54	4	0	35
Comedy venues/nights	0	9	1	1	89
Popular music concerts	5	9	1	1	86
Classical music concerts	2	5	0	1	92
Theatre	2	11	0	0	87
Ballet / dance	2	3	0	0	95
Cinema	24	33	0	0	59
Festivals & outdoor events	46	7	1	0	50
Evening social clubs, faith, societies, edu	0	17	0	1	82
Evening sports facilities	0	14	0	0	86
Shops & boutiques post 6pm	0	38	0	0	62
Off licences	4	28	2	1	69
Under 18s nights, events and activities	0	1	0	0	99

(D/K = Don't know)

146. Residents we interviewed used a range of the town's facilities in the evening, with restaurants, takeaways, traditional pubs, bars and wine bars, the cinema and later opening shops being visited by at least 25% of individuals after 5:30pm and until 11pm.

147. It is worth noting that, despite some of the problems that residents have with takeaways (particularly litter and noise), they are also major users of them (54% in the evening). This suggests that many of our surveyed residents are not against fast food shops in principle, but as we saw from the council's own survey, they are disapproving of about 'negative

externalities' that they associate with them and their late-night users. It is also worth noting that residents hardly use takeaways after 23:00hrs (only 4%).

148. It is also true that most residents do not use the facilities that are open past 23:00hrs generally, e.g. nightclubs (7%), live music (1%) and off-licences (1%). Obviously, while nightclubs are at their peak between midnight and 04:00hrs, the latter two of these have mostly closed by midnight, with a few exceptions. However, town centre residents interviewed are clearly frequent users of the evening economy, they are just not out much past midnight.
149. It is worth noting that the survey was undertaken two weeks before the new cinema at Riverside North opened so these figures, e.g. 33% of respondents using the cinema in the last six months in the evening, will probably increase substantially.
150. Residents also benefit from off-licences, with 28% of them using them in the evening. This may be higher as a lot of people don't classify the likes of Tesco and Sainsbury's as 'off-licences' but as later opening shops (which 38% of users said they used in the evening). This again suggests that town centre residents aren't opposed to off-licences per se (although they may think there are too many in certain streets), but rather that they are concerned about the impact of them serving to those who are already intoxicated and in particular street drinkers who can then cause social problems.
151. From a daytime perspective, Bedford residents *do* like to attend organised festivals and cultural events – 46%. And as the next question in the survey shows, they want more, suggesting there is a major appetite for daytime / evening cultural events.
152. Whilst the take up of other cultural events such as dance, live music and comedy appear to be relatively low, this doesn't mean there isn't demand for them, it is quite likely that this would be higher if there was more provision of these types of arts in the town centre.

6.2.2 Sufficiency or overprovision of town centre facilities

153. We then asked residents if they thought there were too many / too few or about the right amount of the same activities in Bedford Town Centre.

Figure 5. What facilities do survey respondents feel there are too many or few of in Bedford Town Centre?

Activity	About right	Too many	Too few	D/K
Traditional pubs	50	21	19	10
Bars & wine bars	45	26	10	19
Cafes	54	35	10	1
Nightclubs	31	18	10	41
Fine dining rest.	47	11	26	16
Family/chain/world rest.	56	12	19	13
Takeaways/fast food	40	49	3	8
Comedy venues/nights	13	3	41	43
Popular music concerts	21	2	42	35
Classical music concerts	12	1	40	47
Theatre	17	1	42	40
Ballet / dance	8	1	27	64
Cinema	65	4	20	11
Festivals & outdoor events	45	0	38	17
Social clubs, faith events, societies, edu	39	1	24	36
Evening sports facilities	64	1	14	21
Shops & boutiques post 6pm	38	10	30	22
Off licences	33	26	5	36
Under 18s nights, events and activities	1	1	22	76

154. There was a very clear divide between the types of activities for which many residents felt there were too many (alcohol-led) and for those activities where there were not enough (the arts).
155. For example, almost half of respondents (49%) felt there were too many takeaways in the town centre.
156. Interestingly, this was followed by cafes (at 35%). Even though café users are not seen to cause problems in the same way as those of takeaways and clubs late at night, there has been a backlash in many locations across the UK regarding the rise of chain coffee shops and Bedford has a considerable number of Costa, Nero and Starbucks outlets. It may be this that is what's driving this response.
157. When we undertake any survey, we get a sense whether what respondents are saying reflects the 'reality on the ground' as opposed to saying what they think the interview wants to hear or what they should say. This can be revealed by the specific answers they give. In this question, we can see this phenomenon in the number of nightclubs. Give the problems many residents say they suffer from late night socialisers (both in the MAKE survey and the council survey), only 18% of respondents felt that there were too many nightclubs.
158. This gives us a sense that respondents are both highly aware and being fair, because after the closure of Vibe, there was at the time of the research only one true nightclub in the town – Empire (albeit some might consider Vogue a nightclub). Around a third (31% of respondents) felt they had the right number of nightclubs in the town.
159. Regarding off-licences, more respondents felt there were about the right number than those that felt there were too many: 33% vs 26%. However, this probably varies by location in the town centre. For example, in the council's own survey, there were many respondents who felt that there were too many off-licences in Midland Road, and a small number who felt there were too many on Tavistock Street. Yet there were very few mentions of there being too many in the pedestrianised heart of the town centre or around the High Street and riverside.
160. This response is reflective of academic research which does suggest that licensed venues do cause more problems when clustered together. Single premises (be they an off-licences or pub) rarely cause problems because it is easy to identify a link between any problems and that business and steps can be taken to improve the management or withdraw its licence.
161. The area where residents feel the town is substantially underprovided for is in arts facilities. Our own analysis of the town centre also suggests this to be the case, though the recent opening of the cinema in the centre will provide for both residents and those in the suburbs and rural catchment. However, popular music (42%), theatre (42%), comedy (41%) and classical music (40%) are all areas where residents felt there was a need for greater provision. Bedford does have cultural provision, such as the Corn Exchange and The Quarry, but it is by no means a cultural hotspot.

162. As a key part of the creating safer and more sustainable evening and night-time economies our own studies at MAKE and our work through Purple Flag and the Home Office’s diversification scheme, we are seeking to increase the number of non-alcohol-led options for communities.
163. Our survey here and the council’s own survey presented in the chapter above tie together very closely in this regard: many residents - from inside and outside the town centre and from across the wider borough - do not want to come into the centre because of A. the intimidating environment in locations like the High Street at the weekend and B. the lack of entertainment and leisure options to draw them in. This should form the basis of the borough’s town centre development strategy and work by the BID and council in enhancing Bedford’s evening offer.
164. Finally, despite the high levels of participation in festivals in the town centre (e.g. the regatta) residents would still like to see more of them (38%) and greater numbers of later opening shops (30%).

6.2.3 Feelings of safety in Bedford town centre

165. One of the most important areas when surveying residents about their neighbourhood is in understanding how safe or unsafe they feel in their neighbourhood. The council’s own community safety survey is helpful in this regard, but we also asked our respondents how safe they felt in the town centre (their neighbourhood) at different times of day. The results are shown below.

Figure 6. How safe do you feel in Bedford town centre at different times of day?

Time	Unsafe / very unsafe	Safe / very safe
Daytime	5	81
Evening (6pm-11pm)	33	30
Night-time (11pm-6am)	48	15

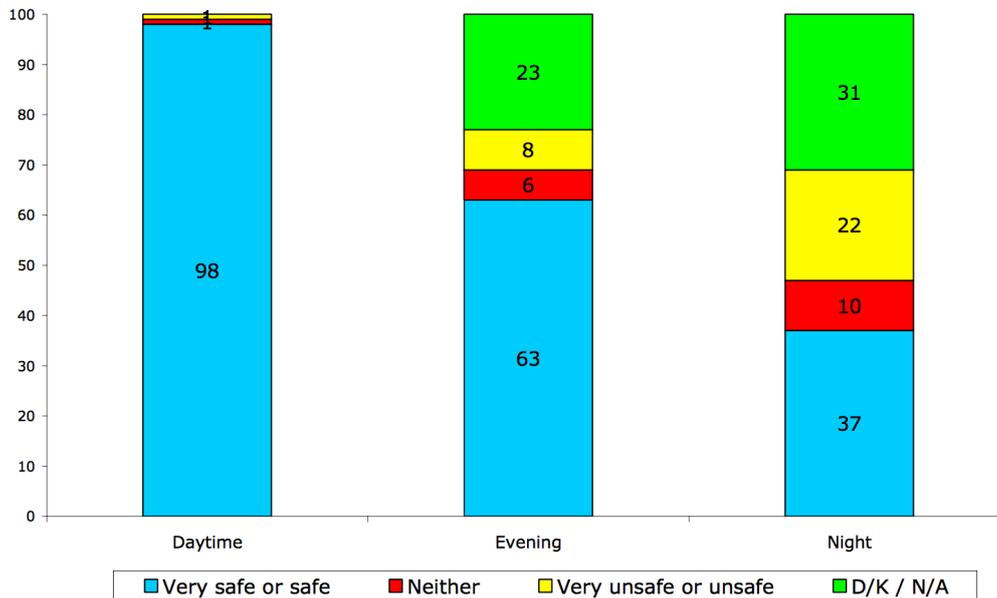
NB totals do not = 100% as there were ‘don’t know’ answers that we have not included here

166. Four fifths of people (81%) feel safe in the town centre during the day. However, this drops very rapidly to only 30% in the evening and 15% at night. This is very concerning as whilst the day-time figure is fairly typical, these are the lowest evening and night-time ratings we’ve seen for a question like this.
167. For example, we have seen and undertaken many evening and night-time economy safety surveys in towns and cities around the UK. Liverpool has a typical set of responses shown in the chart overleaf.

Figure 7. Liverpool city centre public safety survey results

Chart 13 – How safe do you feel in the city centre during the following times?

Base: 850 (Daytime interviewees)



168. As we can see, during the day 98% of visitors to Liverpool feel safe (compared to 81% in Bedford). In the evening, it's 63% (vs 30% in Bedford) and 37% at night (vs 15% in Bedford).

169. In Derby, research that our fieldworkers completed found that 78% of respondents felt safe up to 23:00hrs and this declined to 55% after 23:00hrs. However, again this is much higher than the 15% figure for resident feeling safe post-11pm in Bedford.

170. It's important to note that the methodology and samples are different in each of these locations (Liverpool for example includes both regular city centre visitors and residents, as does Derby's survey).

171. In Clapham our results showed that 79% felt 'safe' for 'very safe' during the evening (until 22:00hrs) and 50% still felt safe at night (after 22:00hrs in this case). These times are an hour different to those in Bedford, but even so this is higher than the 30% and 15% respectively in Bedford.

172. So, while Liverpool has its own problems around violence in the night-time economy, it's clear that there are greater feelings of safety more generally. This may be because there is greater diversity in the city centre than there is in Bedford. However, in short, Bedford should not have ratings as low in the evening and night-time economy.

173. So, whilst we can't make absolute comparisons between the two surveys, what is clear is that Bedford must improve the feelings of safety in the town centre for residents.

174. In Bedford *women* feel less ‘safe’ than *men at night* (10% vs 22%). This is a typical trend. In Cardiff, a recent survey showed that only 51% women felt safe at night, but this is still safer than our sample from Bedford.

175. In the evening, *younger* and *older* residents feel equally safe / unsafe. However, at *night*, *younger* people feel **less safe** than older residents (42% vs 56%). At first this may appear counterintuitive, as traditionally in most community safety type surveys older people feel less safe in nearly all contexts. However, the likelihood is that because younger people are out in Bedford town centre at night more frequently, they see more incidents that influence their feelings of safety.

176. Overall, whilst Bedford is, relatively, a very safe place to visit in the evening and at night (see local crime statistics), we must also bear in mind that it only takes a small number of incidents whilst out and about to create a perception of unsafety in individuals, even though the clear majority of those using the town centre will never be a victim of alcohol or drug related crime in the evening or night-time economy.

177. We must treat this question with caution as the sample size is small.

6.2.4 Experience of crime and anti-social behaviour

178. We then asked respondents if they had ever witnessed any crime at varying times of the day in Bedford town centre. The results are shown below.

Figure 8. Have you ever witnessed crime or ASB in Bedford town centre? If so, what time was it?

Time	Yes	No	DK
Daytime	23	77	0
Evening (6pm-11pm)	20	79	1
Night-time (11pm-6am)	11	84	5

179. Whilst most violent crime takes place at night and is often fueled by alcohol (and to a lesser extent) illegal drugs, most crime (including lots of low level incidents) take place during the day. Bedford is no exception, with almost a quarter of people (23%) witnessing a crime during the day, a fifth (20%) in the evening and only a tenth at night (11%).

180. In the daytime, the crimes that had been witnessed were store theft in shops in the town centre and (alleged) drug dealing in Midland Road.

181. Unsurprisingly, given they use the town more after dark, it was in the **evening** and at **night** that *younger* people were more likely to have witnessed crime in Bedford town centre.

182. About half of residents (48%) interviewed had witnessed ASB during the **day**. This was compared to 46% in the *evening* and 21% at *night*. Again, the lower level at night is almost

certainly due to less people being out at that time of night (31% of younger people had witnessed it vs 11% of older people).

183. If we examine the ‘qualitative’ comments that people gave in support of the ‘types’ of ASB they saw, during the evening these were dominated by accounts of street drinking / aggressive begging, shouting and swearing by intoxicated socialisers and, occasionally, fighting.

184. At night, these comments were similar to the evening but with more focus on assaults / fighting / urination / vomiting.

185. We then asked respondents if they had ever been a victim of crime in Bedford Town Centre. The results are shown below. We asked them not to include any crime in their own homes (e.g. domestic violence, burglary etc.)

Figure 9. Have you ever been a victim of crime in Bedford Town Centre?

Time	Yes	No
Daytime	6	94
Evening (6pm-11pm)	5	95
Night-time (11pm-6am)	2	98

186. Fortunately, most respondents had *not* been a victim of crime. And, like our results for ‘witnessing crime’, less people had been a victim of crime at night than during the day. This is likely because less of our respondents are out at night to become a victim of crime (although we were unable in our survey to go into that level of depth).

187. However, what the results suggest is that being a victim of crime is relatively unlikely in Bedford town centre and this is something that is positive. But it also shows that there is a gap between ‘perception’ of crime and ‘actual’ crime in many residents’ minds.

188. It is also worth flagging up that these answers are for somebody’s entire time spend living in Bedford town centre, i.e. we didn’t put a time limit on their answer. So, whilst some people will have lived in the town centre for a few months, most will have lived there for at least a year or two and there will be some who have lived there for a decade or more. This further reinforces that people’s chances of being a victim of crime in Bedford town centre, at any time of day, are low.

189. We then asked people what crime they had experienced. It was mostly damage to vehicles, but also theft (daytime) and threats. More seriously, there was one mugging and one stabbing reported.

6.2.5 Improving Bedford town centre

190. We then asked people what improvements they would like to see at night in the town centre.

This was to provide *quantitative* data to the *qualitative* written answers that residents gave to the council's questionnaire.

Figure 10. Improvements to Bedford town centre at night

Improvements to Bedford town centre at night	%
More police/PCSOs on the beat	70
Further enforcement against street drinking	34
More street wardens	33
Addressing aggressive begging	23
More or better street lighting (to deter crime and enhance public safety)	15
Street cleansing in the evening	15
Later public transport	14
More taxis	3
Other	31

The total does not equal 100% as people could choose multiple answers.

191. As with the council survey comments, the most important addition was more police or PCSOs visible (and to a lesser extent street wardens). This is important because often there were comments in the council survey about wanting the police to be on foot patrol not just in cars and vans, which is often a concern for the public.

192. There was support for greater enforcement against street drinking and aggressive begging as per the council's survey.

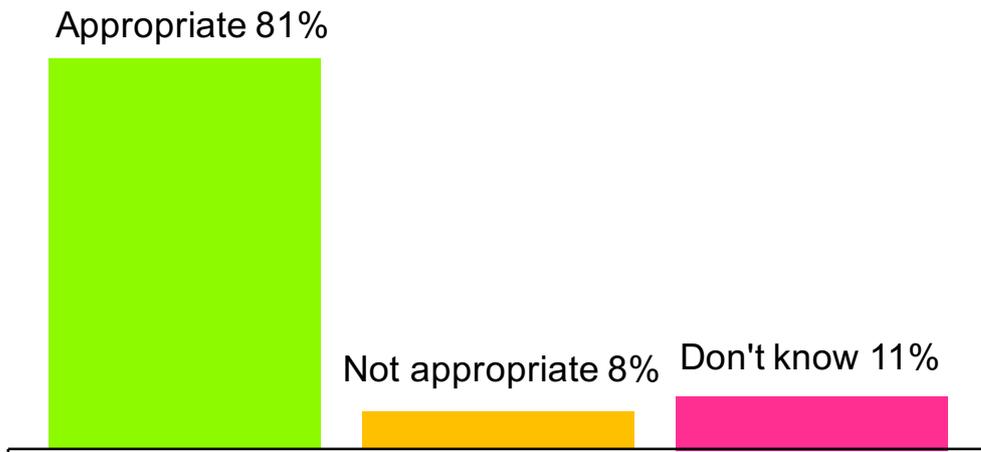
193. We also added some possible answers that the public often don't think about but which research tells us is important to either reducing crime or improving the night-time economy experience. These included 'street cleansing in the evening' and 'better street lighting', both of which a minority of the respondents thought important (15% in both cases).

194. Later public transport is often the most or second most important way of improving the night-time economy experience, but in Bedford's case only 14% felt it would help. But given that everybody interviewed could walk home in less than five (or ten minutes) then this may not be surprising.

6.2.6 Support for or against introducing a cumulative impact policy

195. Following an explanation of it the concept, we asked respondents if they felt that a 'cumulative impact policy' would be appropriate or not in helping address some of the problems that many of them had referred to in some of their qualitative answers. The results are shown below

Figure 11. Would a cumulative impact policy be appropriate or inappropriate to the town centre?

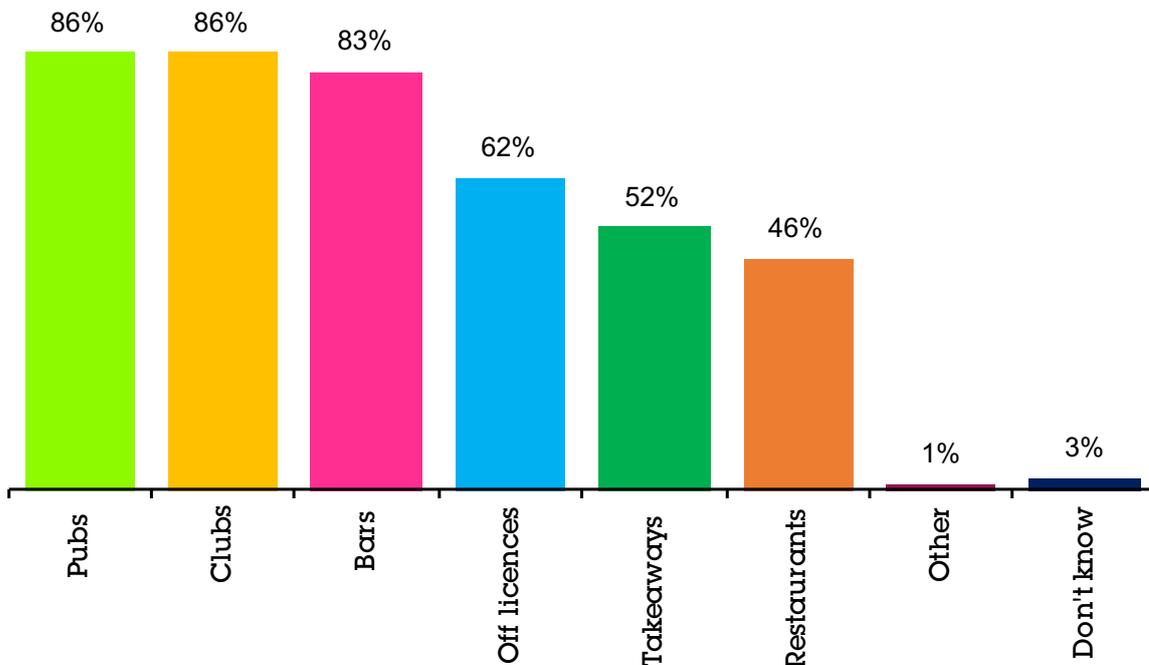


196. Four fifths of respondents (81%) said that such a policy could be appropriate to the town centre and less than a tenth (8%) felt it wouldn't be.

197. In our experience of asking this question in other locations, these proportions are broadly in line with the results from those surveys (e.g. Richmond 86% and Hammersmith 84%).

198. We then asked the 81% of those who said it *would* be appropriate, what types of venue it should apply to (it is possible when drafting a policy to make a CIP licence-type specific).

Figure 12. If the council implemented a cumulative impact policy, what venue types should it apply to?



The total does not equal 100% as people could choose multiple answers.

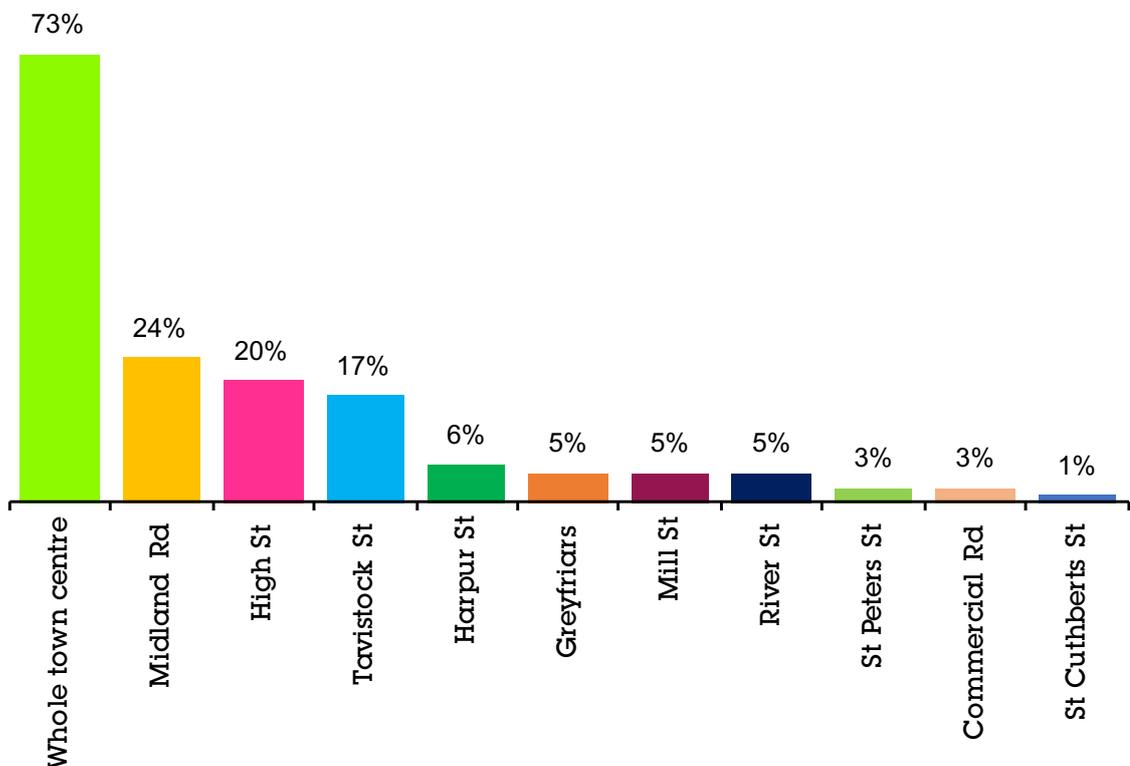
199. This broadly follows other results we have seen, with the exception that pubs are usually considerably lower down the list of priority CIP venue types - normally well below nightclubs and bars. In some cases, pubs are even below off-licences and takeaways. This is because residents often see pubs as a community asset. The fact that they are joint top with clubs suggests that some town centre Bedfordians have issues with (at least some) of the town's pubs. This may be because some of the pubs in the High Street area - where there are problems - are also open very late.

200. Given the street drinking issues in Bedford town centre, it is no surprise that off-licences are also considered worth including in a CIP by those that think such a policy should exist. Over half (52%) also felt takeaways should be included.

201. Interestingly, support for the inclusion of restaurants in any potential CIP was 46%. This is unusual, given that most residents want more family-friendly opportunities for socialising and that restaurants are one of the few growing high street business sectors. It may be that some people feel there are too many of a particular type of restaurant in the town. Within this research we were unable to dig into this further.

202. We then asked the same 81% favouring a cumulative impact policy what parts of the town centre it should apply to if the council did adopt such a policy.

Figure 13. Which parts of Bedford town centre should a cumulative impact policy apply to?



Total is not 100% as people could choose multiple answers (albeit only if they did not choose 'whole town centre')

203. The result here was clearer, with 73% saying any CIP should apply to the whole town centre.

204. Midland Road (with the town's highest density of off licences) is above the High Street, which has the highest density of pubs, clubs and bars, and Tavistock Street which has a lower density than the former two areas. These are the areas we would expect to be highest.

205. Obviously, there are other connected roads, such as Mill Street - which is linked to the High Street, which if the council did introduce a cumulative impact policy, would prove difficult to not include.

206. Likewise, there are areas such as St Peter's Street that did have Vibe nightclub and Modella bar, but these were closed at the time of the research and it is primarily a restaurant and personal services street, so St Peter's would now prove difficult to include in any such policy.

207. Likewise, it is important to note that covering the whole town centre would prove problematic because there are some streets, such as St Loyes Street, Dane Street and Horne Lane that currently have no premises and very few incidents of crime or public nuisance, whether this is recorded crime (police) or that observed during the MAKE observational audit.

7 FINDINGS: Crime & ASB analysis

7.1.1 Background

209. Whilst Bedford (police and council through the community safety analyst) had already carried out extensive crime and ASB mapping of the town, which informs both the community safety strategy and policing, we undertook some additional bespoke analysis for the purposes of this study.

210. In particular, we were interested in how the town's licensed economy and venue locations interwove with issues of *crime and disorder and public nuisance* (ASB). The following charts show that relationship.

211. It is worth noting some definitional issues before proceeding to the mapping.

212. Firstly, the data is for April 2016 to March 2017.

213. These maps only show 'recorded' crime and ASB. This is important as we know that most crimes and ASB are substantially underreported (sometimes by up to 90%). This particularly applies to 'low level' ASB *public nuisance* and this is why we undertook the observational study as well.

214. Some less serious crimes and types of ASB can often become confused. For example, public place urination is a *crime*, but is often seen as ASB or *public nuisance* behaviour (particularly as prosecutions are virtually zero for this offence).

215. In our analysis, we used data that was as close as possible to those *crimes* and *public nuisance* / ASB offences most linked to licensed premises and the negatives that surround some of them, such as 'rowdy and inconsiderate behaviour' for the night-time economy or 'begging/ vagrancy' or 'street drinking' for association with the daytime off-licence economy. (NB. obviously both of these incidents can and do take place throughout the day and at night but they are more common at certain times of day).

216. The full list of these ASB categories can be found in the appendices.

217. We are grateful to Sarah Stephens, the borough's community safety analyst, for her hard work on this section of the study.

7.1.2 Crime

218. The following section focuses on *crime* analysis.

7.1.2.1 All crime by geography

Figure 14. All crime in Bedford Borough and that which is alcohol related (2016/17)

Month	All Crime	Night-Time	Alcohol	Night + Alcohol
Apr-16	861	279	218	69
May-16	890	256	262	66
Jun-16	962	305	292	72
Jul-16	1057	379	336	103
Aug-16	984	384	303	104
Sep-16	1055	336	308	72
Oct-16	948	310	294	73
Nov-16	919	275	292	77
Dec-16	948	371	233	75
Jan-17	894	310	263	73
Feb-17	864	274	231	53
Mar-17	1069	356	280	71
Total	11451	3835	3312	908

219. This table gives us an idea of the levels of crime across the borough as context. We cannot apply it to licensing, alcohol and crime in the town specifically because it includes every type of crime, from burglary to vehicle theft as well as those recorded incidents that are closely linked to the licensed economy, such as violence in the night-time economy areas of the town.

220. However, given that the majority of *crime* occurs inside the town centre (see next figure), it is still a useful table because it shows us that summer months of July and August tend to be the highest for 'alcohol related crime at night', whilst for 'all crime' this has year-round peaks and troughs.

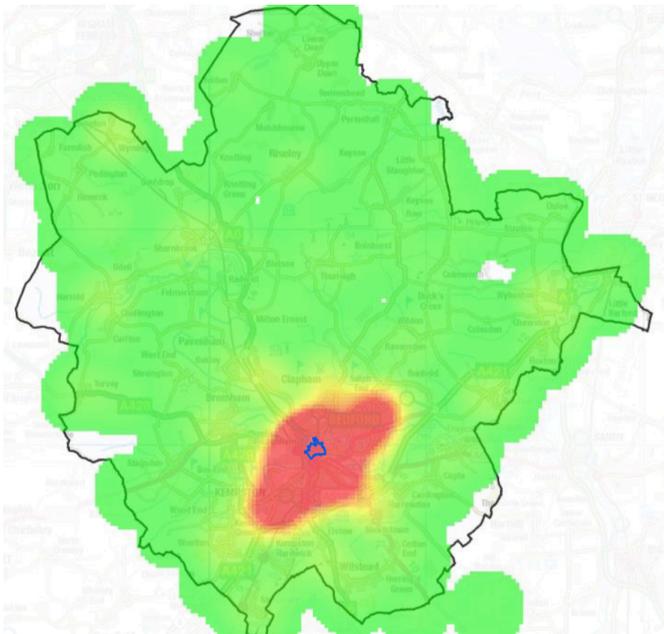
221. This is typical of other areas we have researched, where *crime* in summer spikes related to alcohol and larger numbers of people outside due to the better weather. However, we also tend to see more recorded crime in December in the run up to Christmas too. This does not appear to be the case in 2016-17 in Bedford.

222. A third (34%) of crimes take place at night (21:00-05:59hrs) across the borough and 29% that takes place has an alcohol marker against it. It is important to note that of those crimes that have an alcohol marker, the total will almost certainly be underestimate because the way the police nationally record alcohol's role in any crime is currently highly inconsistent.

223. Around 8% of *crime* is both ‘alcohol-related’ and takes place at ‘night’, albeit as noted above this is likely to be considerably higher in reality given known problems of under-recording of alcohol in individuals who commit crimes.

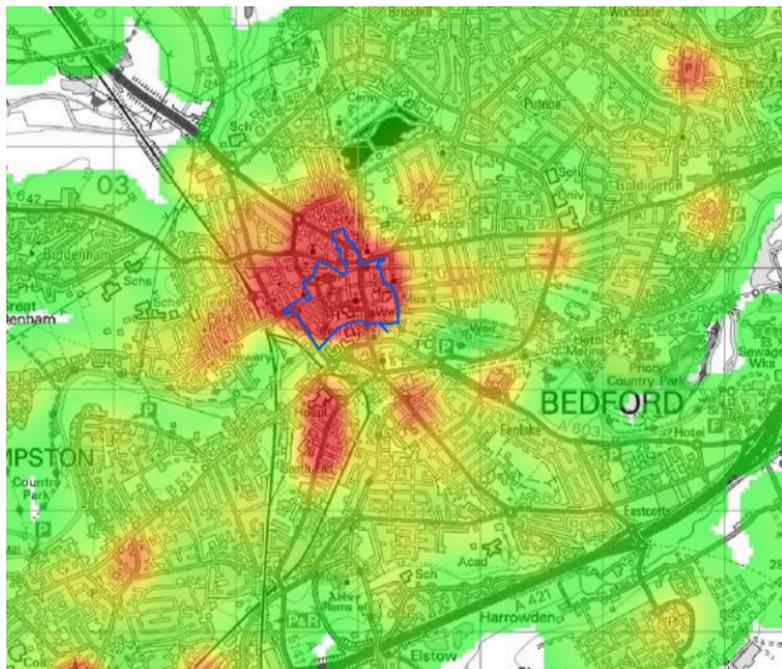
224. The following maps show where all crime is located within Bedford borough.

Figure 15. All CRIME in Bedford borough- April 16 to March 17 (The ‘area of concern’ is shown in blue)



225. The figure above shows clearly that the majority of all crime (not just that associated with the licensed economy and the night-time economy) in the borough is located in and around the urban area of Bedford.

Figure 16. All CRIME in Bedford urban area - April 16 to March 17 (The ‘area of concern’ is shown in blue)

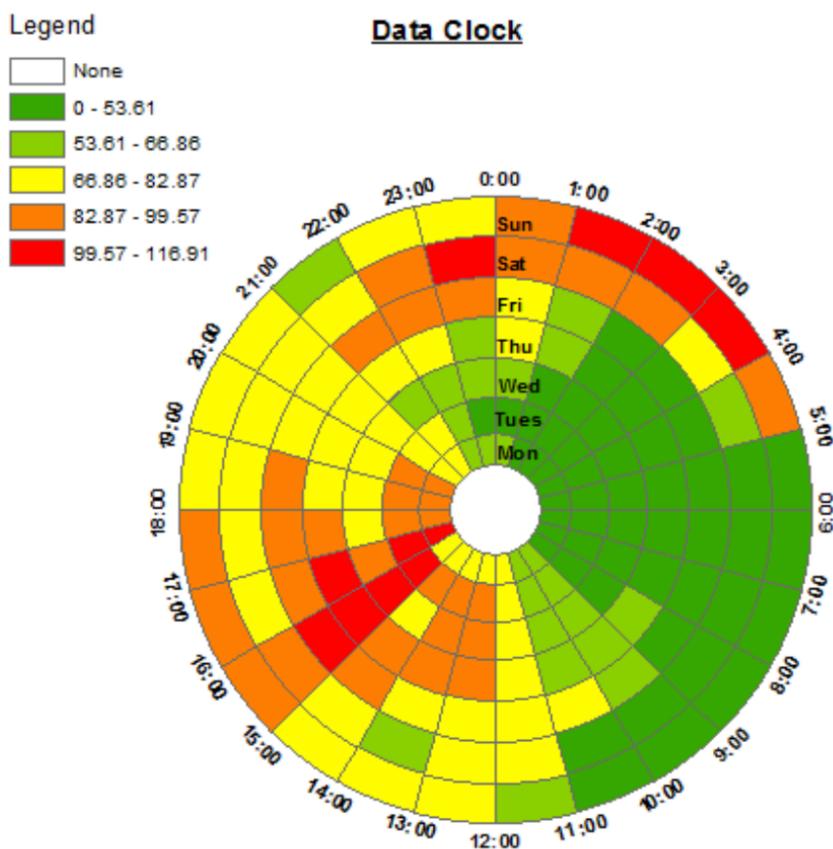


226. The figure above shows all types of *crime* in the Bedford urban area much more clearly. The hotspots are mainly around the town centre and with occasional smaller hotspots outside. The town centre crime hotspot broadly follows the ‘area of concern’, but also extends some way north-west of it as well.

7.1.2.2 All crime, by time of day

227. The following ‘data clock’ shows the times of day and days of the week when ‘all crimes’ took place between April 2016 and March 2017 across the whole of Bedford borough.

Figure 17. All crime in Bedford borough April 2016 – March 2017 by time of day / day of week



228. Whilst this cannot be considered specific enough to be fully representative of crime related to Bedford town centre’s licensed economy, what this data clock does reinforce is how disproportionate the night-time economy is likely to be in contributing to the overall crime figures for the borough. We can see this because of the patterns on Friday and, particularly, Saturday night, when the borough suffers peaks of crime from 23:00hrs through until 04:00hrs on the following Sunday morning.

229. During these hours, it is almost certain that certain crimes aside, e.g. rural burglaries, drink driving - the bulk of crimes in the borough across the year took place in the town centre - as

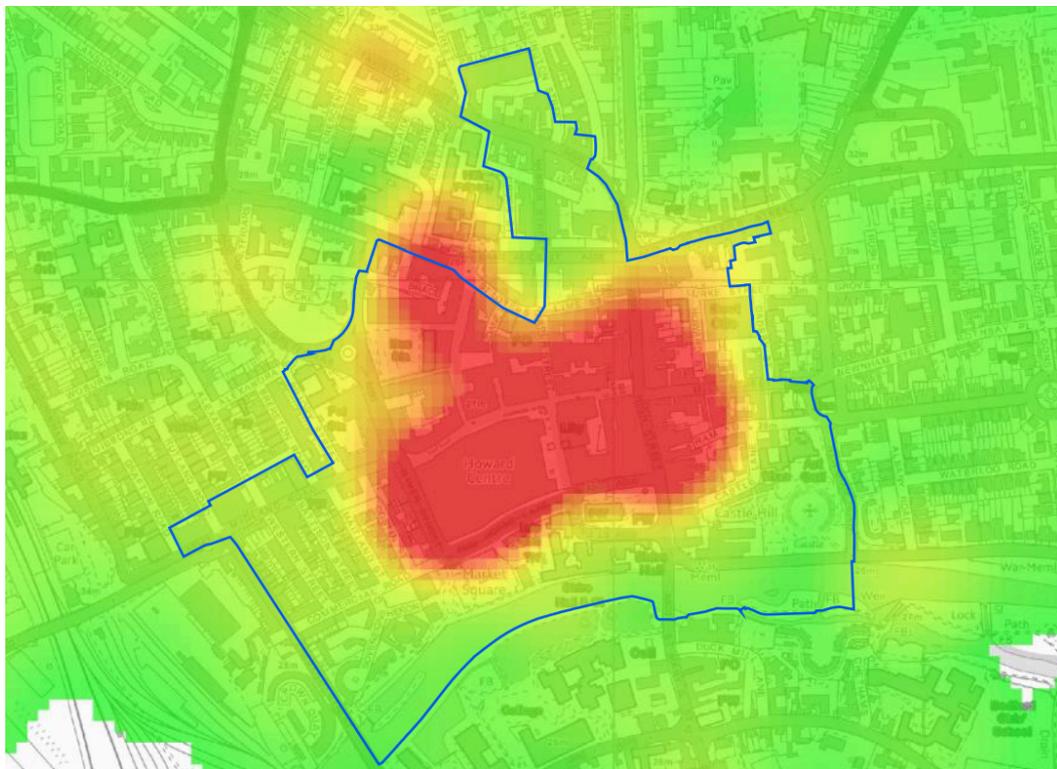
the previous maps showed. The town centre is thus both a place *and* time specific hotspot for the 'lion's share' of Bedford Borough's crime.

230. On Friday nights, whilst less crimes are recorded, they mirror exactly the operating hours and intensity of the town centre's night-time economy as per our observations: starting a little earlier and winding down about an hour earlier than Saturdays and with a lower footfall overall.

7.1.2.3 All crime in Bedford town centre

231. The next figure shows crime in the town centre and the area of concern. It is clear from this that the area of concern is not quite contiguous with all crime that took place in 2016-17.

Figure 18. All CRIME in the Bedford town centre - April 16 - March 17. (The 'area of concern' is shown in blue)



232. Whilst the whole of Bedford town centre sees raised levels of crime relative to the rest of the borough, even within the town centre itself there is a clear focus of crime in the pedestrianised heart, High Street zone and up to Tavistock Street.

233. It must be borne in mind that this is *all crime* and we examine alcohol-related crime below. However, what we can see is that recorded crime in the western end of Midland Road is lower than the pedestrianised heart. This suggests a number of possibilities. Yes, there may be more crime happening in the town centre but also perhaps that there is underreporting of some crime

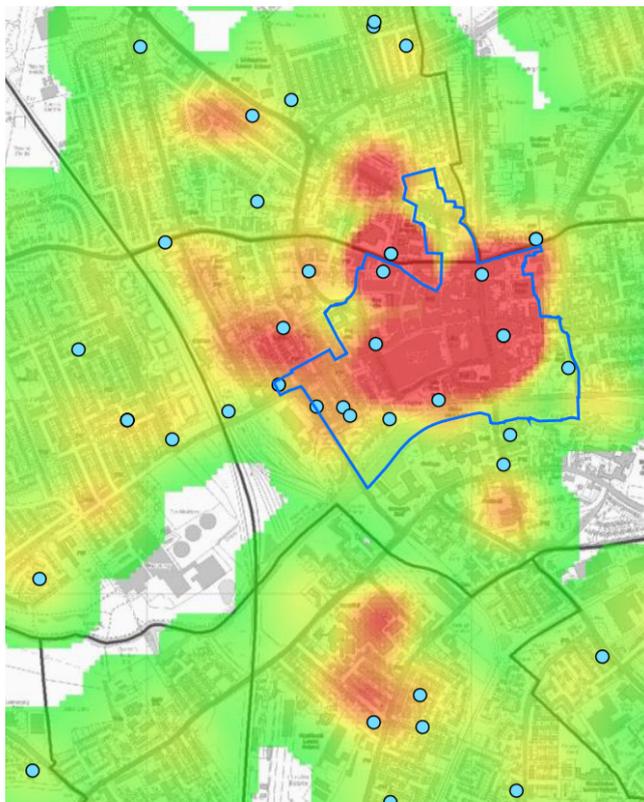
in the Western end of Midland Road (this happens if it is frequent and lower level and residents become immune to it).

234. Also, there are considerable amounts of shoplifting in the pedestrianised area of the town centre which rapidly increases reporting levels in our experience of crime analysis in any town or city centre.

7.1.2.4 Most and less violent crimes

235. Below is a map that shows the most serious violent crimes (MSV - the blue dots) with the much larger amount of less serious violent crimes (LSV) in the 'area of concern', town centre and suburbs between April 2016 and March 2017.

Figure 19. MSV and LSV, April 2016 to March 2017 (the 'area of concern' is shown by the blue boundary)



236. Overall, the large majority of both less and most serious violent crimes take place centrally in Bedford borough and town centre.

237. The least serious violent crimes are much higher in number and more concentrated in the town centre and within the 'area of concern'. There are two outliers here - the northern spur of the 'area of concern' - near Tavistock Street and the south east / south west of the riverside, both of which are relatively free of violent crime.

238. There were only five MSV crimes in the town's night-time economy area (and only two on the High Street) between April 2016 and March 2017. This is surprisingly low give that this is the epicentre for less serious violent crimes.

239. The likely explanation for this is that, due to a larger police presence (and large number of door staff), that while numerous fights clearly do break out (usually between men aged 18 to 30), they do not escalate to crimes such as GBH, murder and attempted murder because the police and security intervene first. This was witnessed in our own observations of Bedford and in all the other locations where we have worked.
240. There are however considerable MSV incidents just outside the 'area of concern', particularly in some of the residential roads off Midland Road and Tavistock Street. These incidents are all within walking distance of the off-licences on Midland Road and Tavistock Street. Whilst we are unable to examine individual incidents, national and international research suggests that many of these will be very serious domestic violence crimes where there was nobody to step in to protect victims until it was too late.
241. Whilst it must be made clear that there is no evidence in any academic literature of a *causal* link between alcohol and violence (nor is there likely ever to be as violence is a learned behaviour), violent acts may be instigated by the perpetrator having lowered inhibitions due to alcohol or having become aggressive as a result of alcohol misuse. This is almost certainly the case given international research shows, varyingly, that between 45% and 92% of domestic abusers have been drinking alcohol at the time of the crime.
242. This is an area where Bedford would benefit from additional research – the role of alcohol its purchase locally and its association with incidents of domestic violence in the borough (and by default in local residential areas such as Midland Road that have above average levels of violent crime).

7.1.2.5 Sexual offences

243. Sexual offences range from less (but still very) serious crimes, such as sexual harassment, through to the most serious violent sexual crimes such as rape. Of course, they take place in many different settings, including the home and workplaces but of interest to us in this study is any co-location around licensed premises and the night-time economy.
244. It is also important to acknowledge that sexual crimes are one of the crime types that are most underreported. We know this due to the discrepancies between (lower) police-recorded incidents and higher numbers of victims that the British Crime Survey finds each year. Whilst it's difficult to obtain accurate statistics on sexual crimes in the night-time economy, many experts, including the police, women's groups and anti- NTE sexual harassment organisations like Hollaback, as well as Street Angels and Street Pastors tell us that over the past decade they have seen an increase in the number of incidents of the more serious sexual crimes and sexual harassment in the night-time economy.

245. Below is a map showing those *most serious* sexual crimes recorded in Bedford, the ‘area of concern’ and the town’s suburbs in the twelve months to March 2017.

Figure 20. Most serious sexual crimes in Bedford Town Centre and suburbs, April 2016 to March 2017



246. The map shows that there are some outlying smaller sexual crime hotspots, but that the three main hotspots are around the High Street, the junction of Midland Road and Bridge Street and around Dame Alice Street near the prison.

247. Most obviously the High Street is commensurate with the night-time economy, but without the individual incident records we cannot fully explain why these other hotspots exists.

7.1.3 Antisocial behaviour

7.1.3.1 Introduction

248. We undertook analysis of antisocial behavior at the borough level and within the 'area of concern'. We analysed 'all recorded ASB' and then pulled out those ASB incidents most connected with the licensed economy. This was incidents typically associated with users of off-licences and the night-time economy - such as 'rowdy and inconsiderate behaviour', 'street drinking and begging' and 'noise complaints'.

249. It is worth noting that ASB is a hugely underreported area. The statistics shown here are just the 'tip of the iceberg'. (As our observations show, the police are called to only a fraction of incidents and most incidents are ignored by residents, shop workers, licensed venue staff simply because they are too 'low level').

250. However, it is the accumulation of these that can impact upon people's quality of life, mental health, wellbeing, community cohesion, property prices and so forth, e.g. the street drinking problems around Midland Road and its tangential streets clearly poses significant concerns and stresses on these individuals, as does the very late-night noise on residents in the High Street and neighbouring quarters.

Figure 21. All recorded ASB in Bedford borough 2016-17 by month and by night-time / alcohol-related

Month	All ASB	Night-Time	Alcohol	Night + Alcohol
Apr-16	513	156	81	46
May-16	586	205	76	37
Jun-16	574	208	75	47
Jul-16	710	271	111	48
Aug-16	635	277	113	47
Sep-16	582	213	88	43
Oct-16	508	151	77	30
Nov-16	434	158	76	37
Dec-16	442	172	67	37
Jan-17	405	135	55	25
Feb-17	449	149	60	23
Mar-17	518	155	67	23
Total	6356	2250	946	443

251. All ASB across the borough follows broadly similar monthly patterns to crime recording. Incidents peak in the summer.

252. 36% of all recorded ASB takes place at night (21:00-05:59) which is similar to the 34% of recorded crimes across the borough.

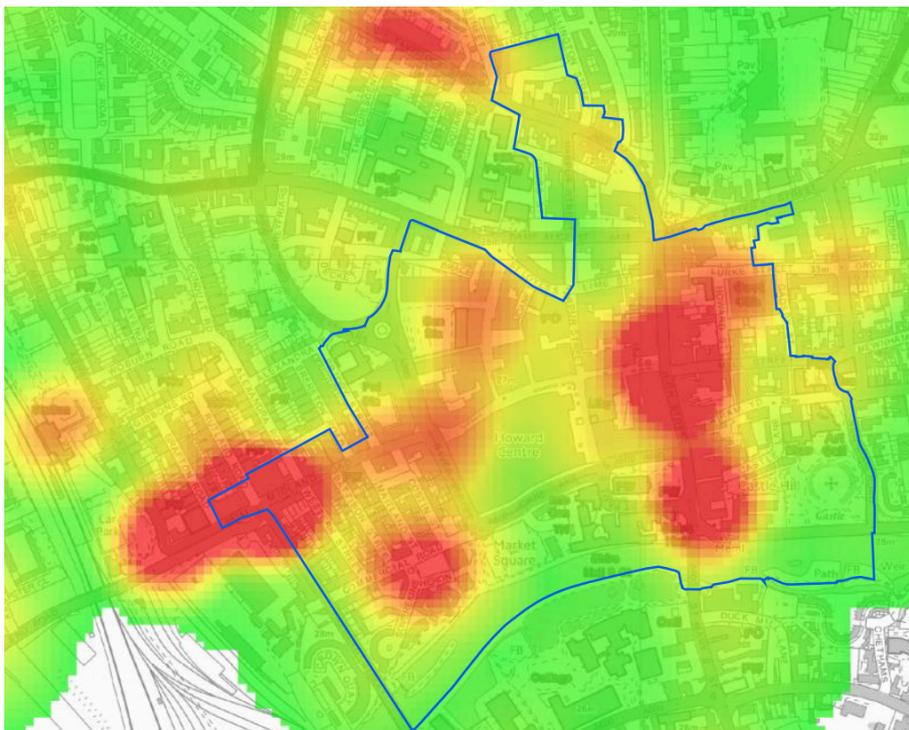
253. Despite over a third of all borough-wide ASB incidents taking place at night, only 15% were said to have an alcohol component. This is much lower than the 29% of crime. However, in reality this is likely to be considerably higher, yet because frequently there is no perpetrator who is apprehended by the police (just a report from a member of the public about shouting or noise), then there is nobody there to make a decision about whether alcohol is involved and whether it was an 'contributory factor' as to why the incident took place.

254. Below we present maps showing the spatial configuration of recorded antisocial behaviour in Bedford borough. It follows broadly similar geographical patterns to crime – i.e. the majority is in Bedford itself and, within those boundaries, most of it takes place in the town centre.

255. However, there *are* some differences at the town centre level, with a much smaller proportion in the pedestrianised area and the majority located in the High Street (night-time economy) and Midland Road and Tavistock Street (off-licence clusters and street drinking hotspots).

256. There is also a cluster near the riverside (where many residents reported street drinkers causing problems) and a small hotspot near the train station, which is common to most towns (intoxicated individuals often hang around these hubs begging for money).

Figure 22. All ASB in the Bedford town centre - April 16 to March 17. (The 'area of concern' is shown in blue)



257. Broadly, this pattern matches our own observations and that of residents.

258. It is important to note that on Tavistock Street, the majority of ASB is located at the north-west end. This is outside the original 'area of concern'. This may be because the ASB in this area is not related to the off-licences in the area or those walking home intoxicated from the High Street shouting and screaming, as well as occasional urination and breaking of bottles (our and residents' observations).

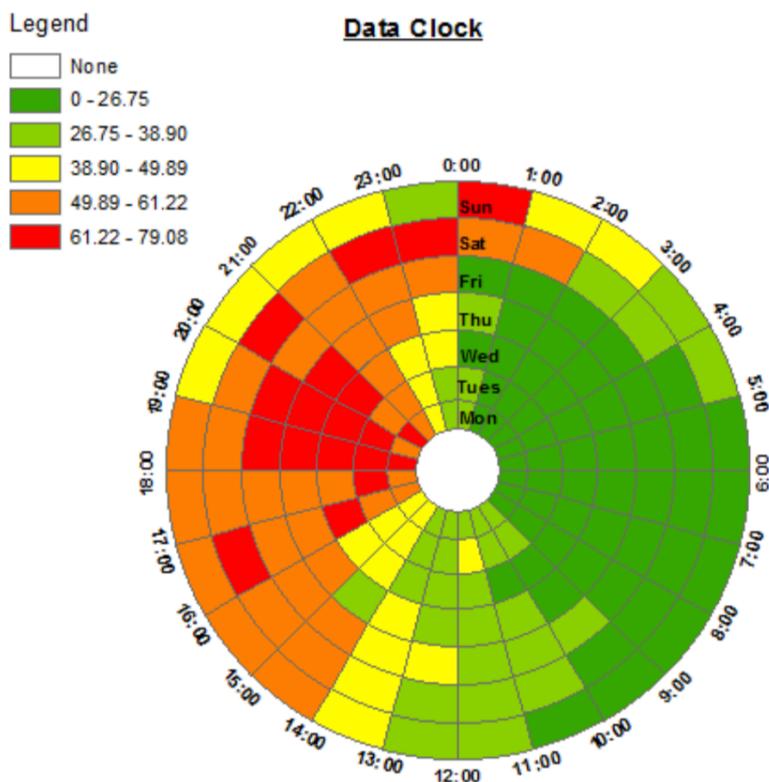
259. For example, it may be that there is a specific building (e.g. a hostel or social housing complex) at that end of the street where rough sleepers or young people gather and other residents may make a large number of complaints about noise and ASB.

7.1.3.2 All ASB in Bedford Borough by time of day and day of the week

260. The chart below shows all the ASB in the borough by the time of day and night when it was reported and by day of the week. Most is concentrated between mid-afternoon and the early hours.

261. Because this chart includes the borough's suburbs and rural areas, when compared to the town centre (see later charts), there is less late night ASB borough-wide. There is also very little ASB before mid-afternoon, whereas in the town centre data shows that ASB, which we know is substantially linked to street drinking and begging, starts as early as 11:00hrs.

Figure 23. ASB in Bedford borough by time of the day and by day of the week



7.1.3.3 ASB Street drinking / begging and off-licence location

262. To be more specific, we then overlaid the location of off-licences (blue dots) with street drinking and begging ASB offences.

Figure 24. Off-licences overlaid with recorded begging / street drinking offences



263. Whilst there are some outliers, overall there is a clear correlation between the locations of off-licences and street drinking and begging offences.

264. There are some off-licences that are in the pedestrianised area of the town centre that are not associated with ASB and begging, probably because they are inside the Harpur centre or the likes of Marks & Spencer - which is not a natural purchasing location for street drinkers.

265. For begging, there needs to be a flow of potential donors passing by. Street drinking often accompanies the act of begging (e.g. sitting next to a cash machine or outside an off-licence) but it can also take place in areas near to these but out of public view. This results in a hotspot at the station, even though there is no off-licence there, and also near the riverside, which residents report as one of the top street drinking and ASB locations in the town centre (and where we also observed street drinking and occasional rowdy behaviour).

266. However, not all off-licences sit inside the hotspots for recorded street drinking and begging incidents. There are multiple possible reasons for this. It may be because some of these off-licences are the likes of Tesco and Sainsbury which are less favoured by street drinkers as they

do not sell the brands of strong lagers and ciders favoured by street drinkers. It may also be that some of these off-licences are independent stores that also do not sell individual cans of drink, or that they are upmarket wine merchants. It may also be that they are simply too far from the centre and its flows of people from whom to beg.

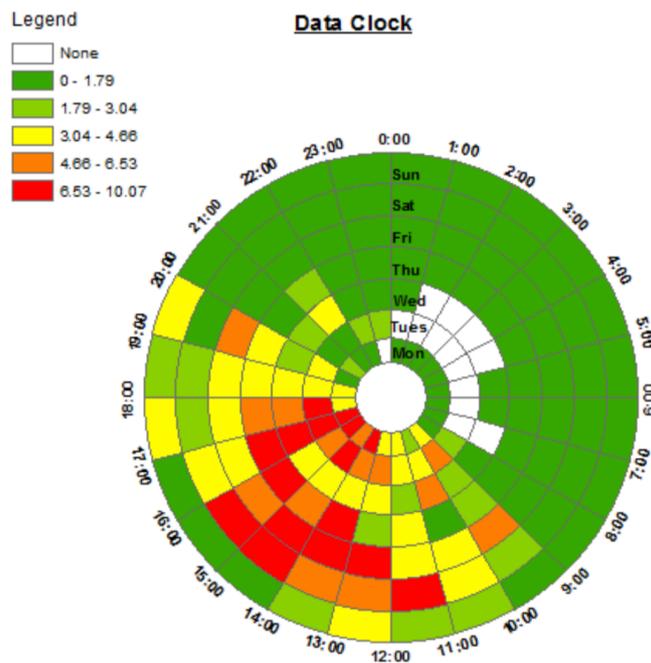
267. This is almost certainly true of the ones to the north of the map above / near / in Cavendish Street or near Bromham Road and the junction of Cavendish Street.

268. Certainly, the ‘area of concern’ (and any cumulative impact area - should the council decide to introduce one) may need to be redrawn to reflect the full length of Tavistock Street, certainly regarding of-licences.

7.1.3.4 ASB Street drinking and begging - by time and by day of the week

269. We then analysed what time of day these begging and street drinking offences took place.

Figure 25. Time of day and week for recorded begging / street drinking offences



270. Street drinking and begging incidents are mainly occurring between 09:00hrs in the morning through until around 20:00hrs in the evening. The peak time for them is between midday and 17:00hrs. This is a wholly typical pattern reflecting when street drinkers and rough sleepers get up, leave their accommodation / hostel and are on the streets drinking and begging.

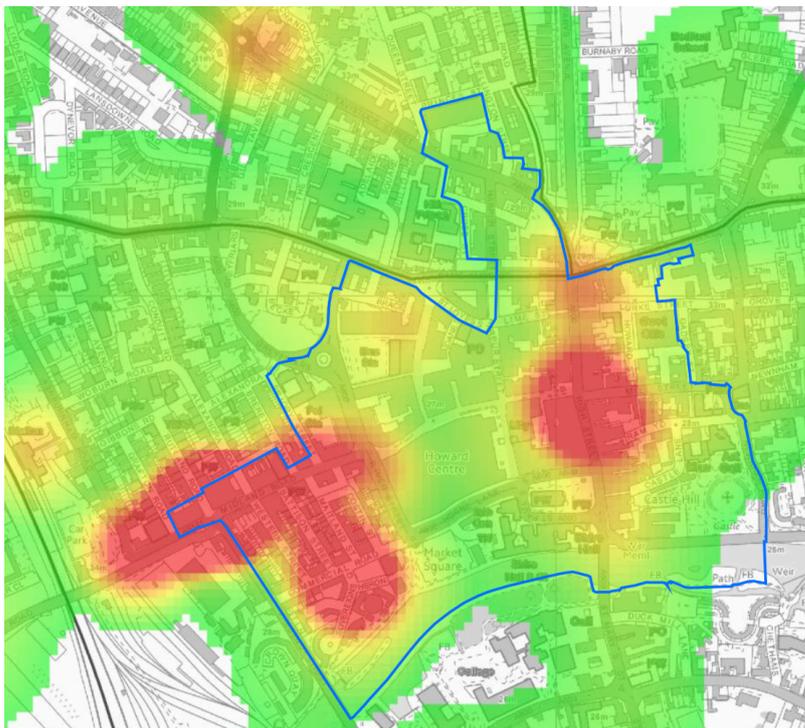
271. In terms of days of the week, Monday to Saturday are when the highest levels of street drinking and begging incidents are reported (incidents being higher slightly early in the day on Friday and Saturday). Sunday has very few reported incidents. It is not immediately apparent why this is, given street drinking is a ‘seven day a week occupation’ for those who are unfortunate

enough to be dependent on alcohol. It could be that there are less people or police around to report / record incidents.

7.1.3.5 All alcohol –related ASB

272. We then analysed alcohol-related ASB incidents that were reported to the police over the same period, April 2016 to March 2017. (It is important to note that this probably still underestimates the number of alcohol-related ASB incidents, because as with alcohol-related crime, we know from other research that all forms of alcohol-related incident reporting are low).

Figure 26. Alcohol related ASB incidents in Bedford town centre



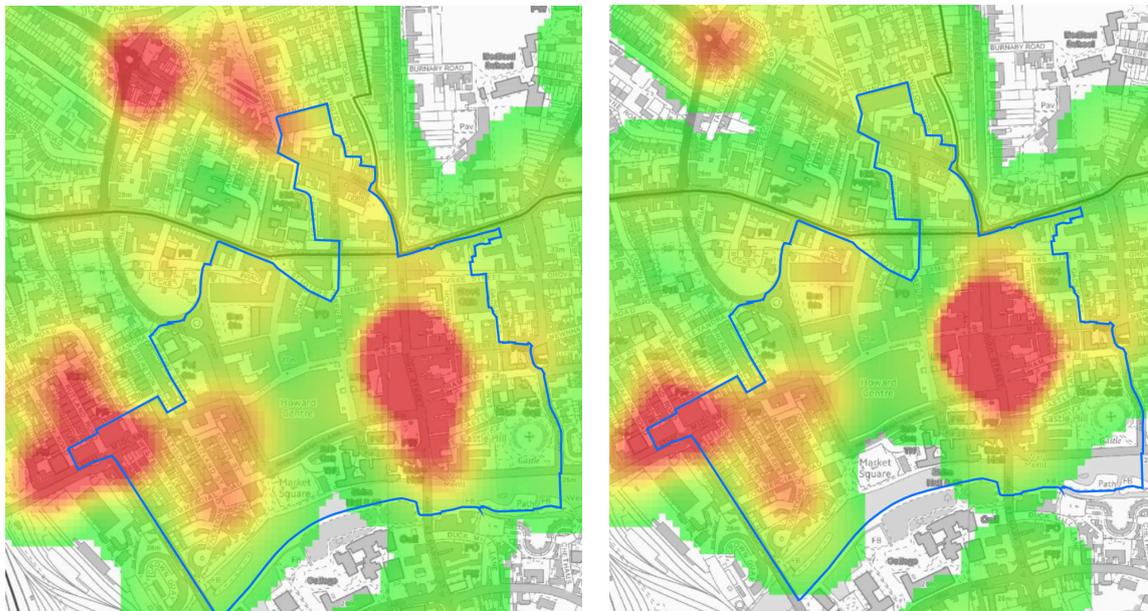
273. The two concentrations of alcohol-related ASB incident reporting are concurrent with the two main areas that we identified in our own observations for these problems – Midland Road and the High Street. It is the Midland Road that has the greatest number of incidents.

274. It is also clear that Tavistock Street is less affected by alcohol-related ASB reported incidents.

7.1.3.6 All alcohol-related ASB - at night

275. Below we filtered *all* ASB recorded incidents by night, i.e. between 21:00hrs and 05:59hrs the following morning (chart A on the left) and then *all* ASB by night but also with an alcohol marker (chart B on the right).

Figure 27. Two maps showing A. Night-time ASB / B. Night-time ASB with alcohol marker



276. The two maps appear relatively similar; however, the most obvious difference is that in the north of the map - where Tavistock Street meets the roundabout at Union Street - there is a lower proportion of night-time ASB recorded incidents that are *alcohol*-related.

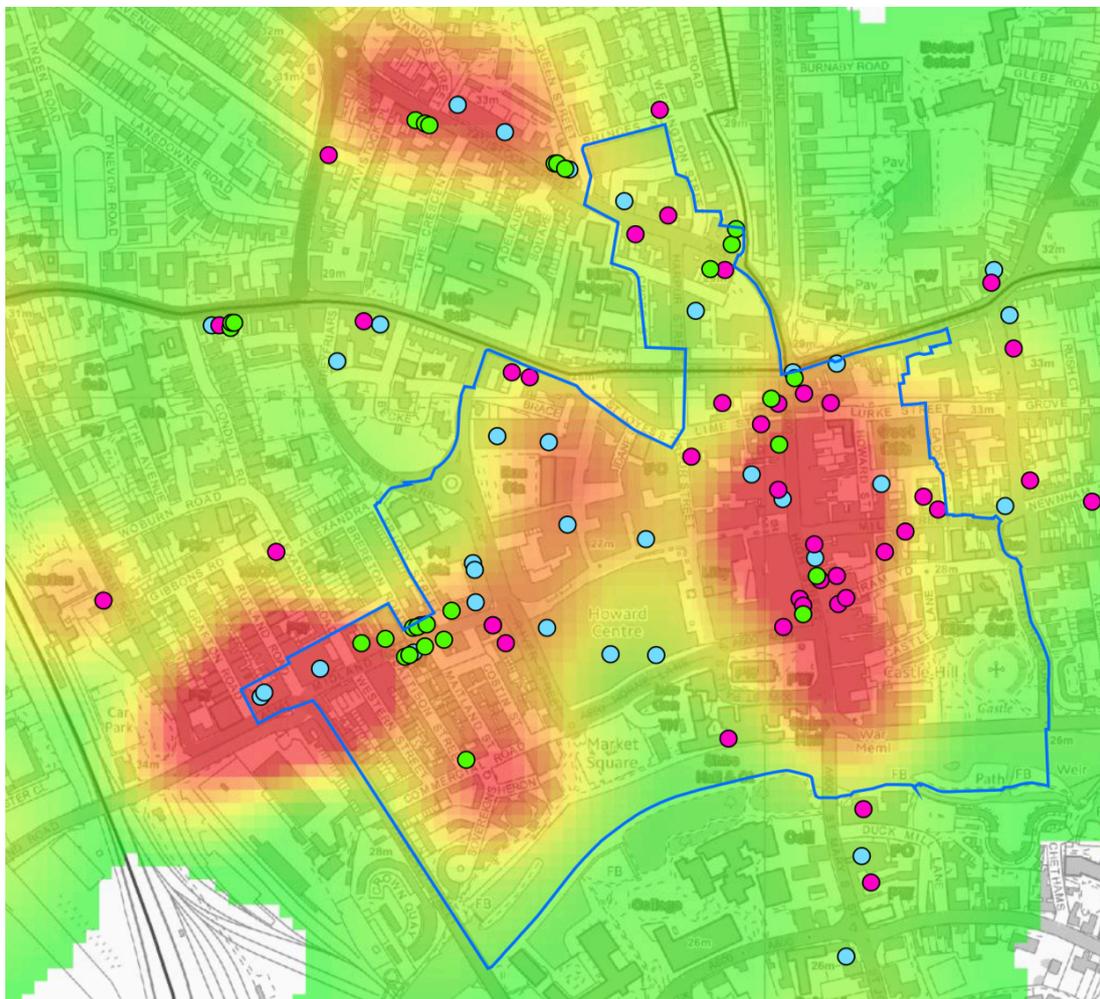
277. The *alcohol*-related night-time ASB hotspot at Midland Road is also smaller at night (right hand map) when we consider it against all incidents of night-time ASB (left hand map).

278. This ASB hotspot is at the far west end of Midland Road and corresponds with our observations of where street drinkers gather. There is also lower level of ASB problems (orange not red shading) the whole way along Midland Road east towards Bridge Street.

7.1.3.7 All ASB in relation to licensed premises

279. The chart below shows all ASB recorded incident hotspots in Bedford Town Centre with all types of licensed premises overlaid.

Figure 28. All ASB with licensed premises overlaid



Blue dots = Licensed Retailers, Green dots = Late Night Refreshment, Pink dots = Pubs, Clubs and Night Clubs

280. The clusters of ASB and of licensed premises show a strong correlative relationship

281. There are, however, some clear differences between the three main hotspots – with the Midland Road hotspot associated with the presence of takeaways and off licences.

282. The High Street ASB hotspot is linked to a cluster of pubs, bars and nightclub, as well as five takeaways but fewer off-licences.

283. The Tavistock Street ASB hotspot is dominated by takeaways and off licences.

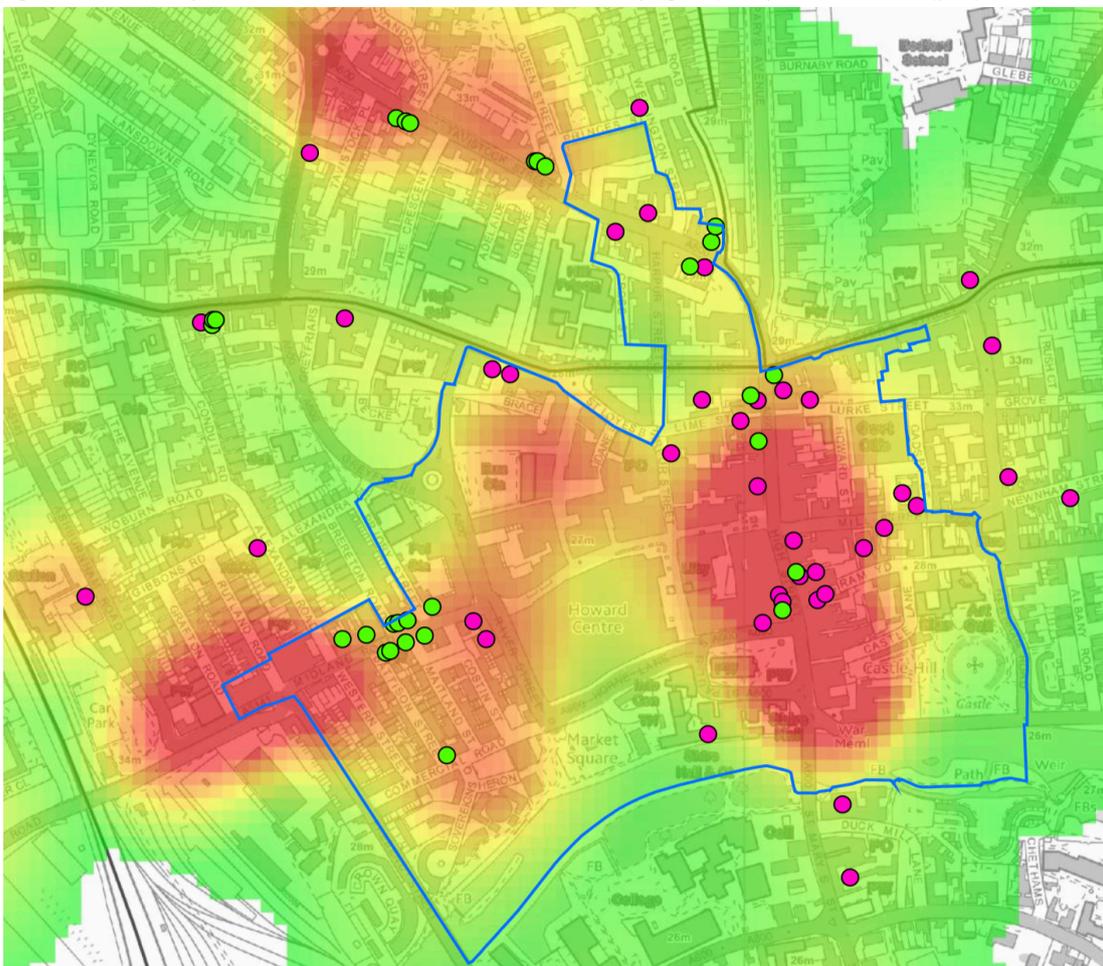
7.1.3.8 ASB (rowdy & inconsiderate behaviour) and evening / late night licences

284. We again drilled down into the types of ASB relevant to the night-time economy.

285. The following map shows reported 'rowdy and inconsiderate behaviour' in 2016-17 mapped against two licence types that operate until late in the evening / into the early hours: late-night refreshment premises (i.e. takeaways) and on-premises (pubs, bars and nightclubs).

286. Evidence from many other studies shows that 'rowdy and inconsiderate behaviour' is strongly linked to both late-night premises and also house parties (where alcohol purchased from off-licences or supermarkets is often consumed in large quantities).

Figure 29. 'Rowdy and inconsiderate behaviour' 2016-17 vs takeaways (green) and pubs, bars & clubs (pink)

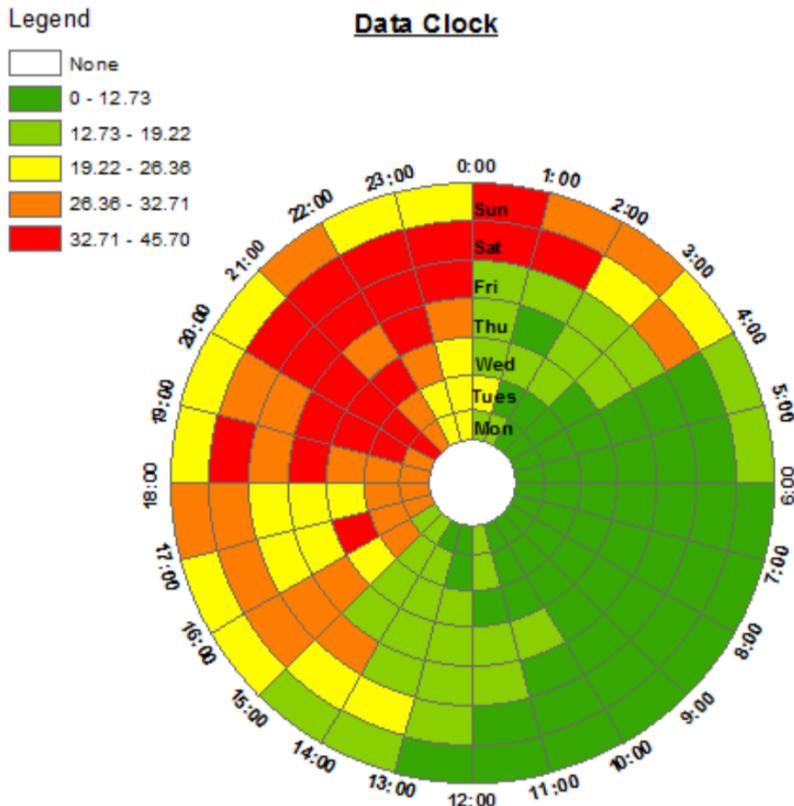


287. The patterns for 'rowdy and inconsiderate behaviour' in the town centre remain broadly the same as for *all* ASB. The hotspot on Tavistock Street is restricted mainly to the north-west end of the street, suggesting something more than just people walking home drunk and shouting - there is a clearly a substantial ASB issue at this end of Tavistock Street.

288. This pattern and the times of incidents (see below), match our own observations of the Bedford evening and night-time economy.

289. If we examine the times when reported ‘rowdy and inconsiderate’ behaviour takes place in the town centre, we can see that the majority of it occurs from 15:00hrs to 04:00hrs in the morning.

Figure 30. Times of the day and days of week when ‘rowdy and inconsiderate’ behaviour is recorded



290. This late afternoon spike in reported ‘rowdy and inconsiderate’ behaviour almost certainly comes from a combination of school-aged children leaving school and some street drinkers.

291. The highest - red - concentrations of reported ‘rowdy and inconsiderate’ behaviour take place between 20:00hrs and 02:00hrs. Most of these reports are on Friday and Saturday nights and for the 00:00-01:00hrs period during Sunday mornings. This is commensurate with the operation of the town’s night-time economy.

292. It is worth noting that ‘rowdy and inconsiderate’ incident reporting reduces (around 02:00hrs) before the operation of the town’s night-time economy ceases (this continues until 04:00hrs and until 05:00hrs for final dispersal). In our experience, this is almost certainly in part because residents, who have been awake until the early hours, have finally gotten to sleep by 03:00hrs / 04:00hrs and they are therefore no longer reporting incidents in the same numbers.

293. It is also highly plausible that the town’s 01:00hrs last entry policy means that for two hours after this time there are fewer individuals on the street until around 03:00hrs/04:00hrs when the remaining venues, such as Vogue, Yates’s and Empire, finally close.

7.1.4 Summary

294. Overall, the crime and ASB analysis demonstrates that the town centre *is* the hotspot of the borough's crime and disorder and nuisance problems. Understandably, this is already well known by the police, council and residents. However, the analysis does reveal some specific temporal and spatial patterns of crime and ASB reporting that are particularly linked to the presence and opening hours of licensing and licensed premises.
295. In the main, crime and disorder incidents are concurrent with the council's original 'area of concern'. However, there is a notable amount of nuisance taking place the full length of Tavistock Street, not just at the south-eastern end that was originally proposed for inclusion in the 'area of concern'.
296. The main hotspot for crime is the High Street and the town centre area. For ASB there are three hotspots: The High Street, Midland Road and Tavistock Street.
297. The times at which peak reported crime and ASB takes place within the town centre / 'area of concern' are commensurate with times that the public in the surveys tell us that problems exist (and this is reinforced by our own observations- see below).
298. That is, in the High Street (including Mill Street / St Paul's Square) where crime and ASB peaks on Friday, and particularly, Saturday nights between 21:00hrs and 04:00hrs.
299. Likewise, the problems of ASB are particularly found in the 11:00hrs and 18:00hrs time zone and in the Midland Road area and, to a lesser but still present extent, Tavistock Street and St Peter's Green.
300. There is also a strong correlation between the density of licensed premises of particular types and the type of crime and ASB incidents. For example, the presence of a high density of alcohol-led pubs, bars and clubs as well as takeaways are present around the highest levels of crime and disorder in the High Street zone. At the same time, Midland Road's high density of off-licences closely correlates with the spatial patterns of ASB and street drinking and begging incidents during the day.

8 FINDINGS:

Observation audit

8.1 Background

301. During MAKE's observational research across 72 hours and over six days and six night-time sessions in June 2017 we sought to record any behaviour or incidents that may be considered in contravention of one or more of the four licensing objectives contained in the Licensing Act 2003:

- a. 'Prevention of crime and disorder'
- b. 'Prevention of public nuisance'
- c. 'Public safety'
- d. 'Protection of children from harm'.

302. The observation area was confined mainly to the council's 'area of concern' (shown below). However, based on the public's response to the council's own surveys, we also observed the full length of Tavistock Street and we also visited some of the peripheral areas to examine if any more central problems crept into these.

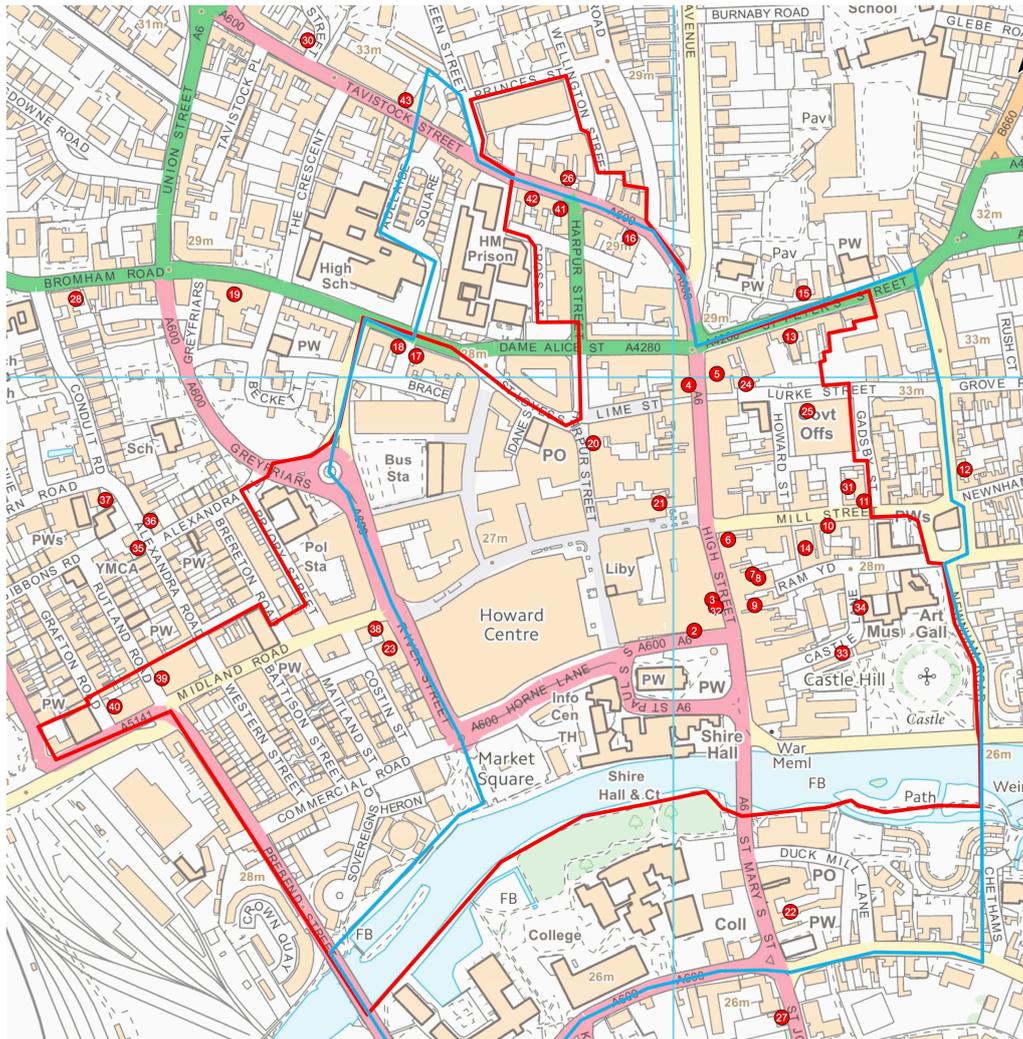
303. The purpose of this observation methodology is to test the quantity of incidents (particular 'low-level' ones) relative to those reported to the police. So, for example, during the observation period, we observed 473 incidents. Virtually none of these would have been reported to the police and we witnessed the police intervening in the most serious incidents of fighting in the High Street area and PCSOs handing out a fixed penalty notice in Midland Road.

304. The reason this data is useful in developing a licensing policy, and in particular deciding if the licensed economy of a place is creating 'cumulative impact', is because *recorded* crime and ASB is often 'the tip of the iceberg'. As such, we wanted to know if this was the case in Bedford as it has been in all the other locations.

305. We did not observe any incidents involving children who appeared to be intoxicated in public spaces, such as the riverside, or leaving shops having purchased alcohol. These incidents may still take place in Bedford town centre, but it suggests that the town's retailers of alcohol are probably exercising reasonable due diligence in not serving underage drinkers.

306. The full list of 473 incidents observed is provided in an Excel spreadsheet format to the council.

Figure 31. Map of observation area (the red boundary is the 'area of concern' and the blue line is that of the town's business improvement district)



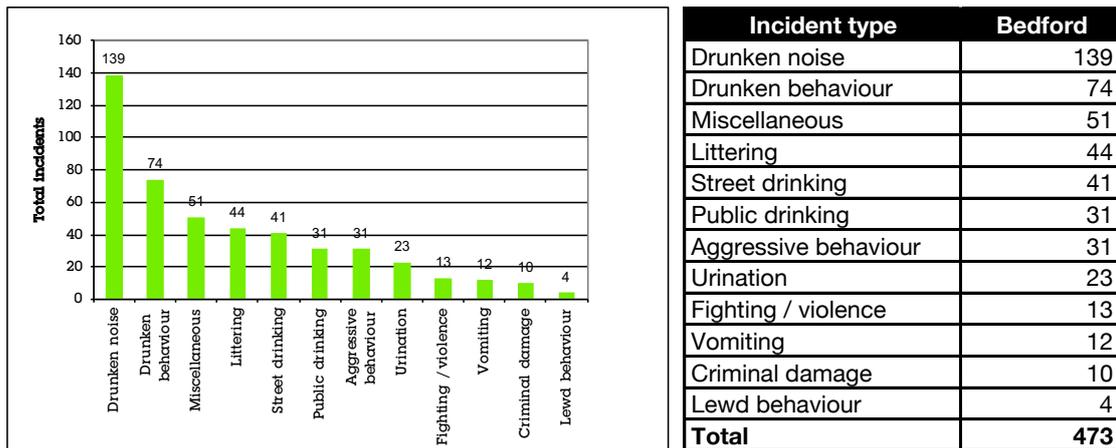
307. We undertook the observations broadly equally across the day and night. Daytime sessions were from 11:00hrs to 16:00hrs and the night-time sessions on the same days took place from 22:00hrs to 03:00hrs on Sunday and Thursday, until 04:00hrs on Fridays and 04:30hrs on Saturday.
308. The earlier terminating night-time observation hours on Thursdays and Sundays were reflective of the much earlier closing times of venues, particularly on Sundays. The extra half an hour of observation on the two Fridays and Saturdays was undertaken to identify any issues with the dispersal as the latest operating venues (e.g. Vogue and Empire) close at 04:00hrs on this night.
309. It is also essential to reinforce that our research, while strongly indicative of what takes place in Bedford town centre relating to the users of its licensed economy, it can only capture a small number of the incidents at any one time and *only* at the locations being observed. The true number of incidents taking place during the observation period in the overall area will likely be multiple times greater. Our observations are almost certainly a substantial underestimate.

8.2 Observations

8.2.1 Overall incidents

310. The table below shows the incidents we observed in Bedford Town Centre during the 72 hours of observation. This includes both the daytime and night-time sessions.

Figure 32. Total recorded incidents during 72 hours of observation



311. Before analysing the trends, it's important to note that in this context the *overall number* of incidents is less important than the *type* and *distribution* of them and the presence (or otherwise) of more serious incidents. So, whilst there are 6.6 incidents per hour, this is relatively unimportant without the context that we provide below.

312. The distribution of incidents is broadly similar to many of our other similar studies, with the highest number of **incidents (139)** being **drunken noise** (people shouting, screaming, chanting and screeching whilst appearing intoxicated). The majority of this behaviour we witnessed in the High Street area between around 23:00hrs and 04:00hrs.

313. **Drunken behaviour** (such as falling, staggering in front of buses, trying to climb street furniture and statues). Most of these **75 incidents** were found in the night-time economy around the High Street and its connected streets between the same hours as above. However, we did witness some drunkenness during the day in and around Midland Road and to a lesser extent Tavistock Street and the pedestrianised area of the town centre.

314. The **miscellaneous** category of **51 incidents** includes what we suspected to be drug dealing in the Midland Road area during the day, but also extreme sound leakage from venues (not cumulative impact), begging (but not of the most aggressive kind) and (infrequently) very serious incidents such as potential sexual predation in the night-time economy,

315. **Littering** is mainly of takeaway cartons and wrappers between midnight and 04:00hrs in the High Street area on Friday and Saturday nights. However, of these **44 incidents**, some were of

pre-loaders leaving bottles and cans around the High Street and street drinkers discarding cans near where they are sitting or collapsed.

316. The littering of street drinking cans and bottles is not as bad as some areas we have studied where there are piles of between 100 and 300 discarded alcohol vessels in public parks and places of waste ground. Most of the street drinking litter in Bedford (town centre at least) is picked up by the street cleansing team before most users of the town centre arrive the next morning.
317. We define 'street drinking' and 'public drinking' differently.
318. **Street drinking**, of which there were **41 incidents** is a practice undertaken by (mainly) rough sleepers who are often begging (occasionally aggressively) and usually in a single static location – sitting on walls, in doorways and by the river in the case of Bedford.
319. **Public drinking**, of which there were **31 incidents** observed is undertaken by a wider range of individuals, but mainly those visiting the town for the night-time economy and who are still drinking from vessels of alcohol before entering pubs, bars and clubs. It also includes those who are drinking whilst walking through town on their way to a party or to meet friends. Both are seen as problematic by most other members of the public.
320. Public drinking at the Riverside by couples or families enjoying the warm June weather are not included in our figures, unless there were other problems associated with them. Unlike our Richmond-upon-Thames riverside study (which has substantial riverbank drinking issues), we did not see any issues linked to those 'picnic' type drinkers by the Great Ouse.
321. In most locations, we would expect to see more *public* drinking, particularly pre-loading (for example in our studies of Kingston upon Thames or Richmond and Fulham) than *street* drinking. In Bedford's case, like our Hounslow study, we observed more *street* drinking. This is linked to the relatively high number of rough sleepers and those with clear alcohol dependency problems.
322. There was a relatively large number of **aggressive behaviour** in a short observation period. The **31 incidents** were divided between aggressive begging by rough sleepers / homeless individuals and those in the night-time economy demonstrating aggression to each other (intimidating behaviour, using threats etc.) and against door staff (and occasionally towards police officers).
323. **Urination (23 incidents)** and **vomiting (12 incidents)** are at relatively typical levels for this type of study and scale of night-time economy in our experience. The hotspots for this are the alleys (as noted by many residents) around the High Street. Other locations for urination included Lime Street, Lurke Street and Howard Street as people move around the area between venues.

324. The **10 incidents of criminal damage** we observed was relatively limited in its nature and was mostly ‘attempted’ rather than successful, e.g. the kicking of shop windows that surprisingly didn’t break, the picking up and throwing of bins at other people and windows. This is typical and at lower levels than some of the other studies we have undertaken.

325. **Lewd behaviour** (public place sex) or lewd comments (which are close to the boundaries of sexual harassment) were limited in Bedford – **4 incidents**. That is not to say they don't happen in larger volumes but just that our observations only showed a small amount.

8.2.1.1 Bedford vs Hounslow

326. The only other study that we have undertaken in the UK that analysed *both* daytime (i.e. for street drinking) and post-22:00hrs activity (for night-time economy impact) has been in Hounslow west London. Most of our studies have been solely at night.

327. Hounslow is different to Bedford in many ways so we are hesitant to draw a direct comparison. It has a smaller night-time economy – five venues vs. around 15 in Bedford but a similar street drinking problem and a much greater number of off-licences.

328. Our study of Hounslow took place in 2015 and, due to a more complex borough-wide geography, we needed almost twice as many observational hours (133 hours to Bedford’s 72 hours) to produce meaningful data. However, despite the differences between the two locations, it is a useful comparator in ways we explain below.

Figure 33. Total recorded incidents in Bedford (72 hours of observation) vs Hounslow (133 hours)

Incident type	Bedford	Hounslow
Drunken noise	139	157
Drunken behaviour	74	64
Miscellaneous	51	29
Littering	44	51
Street drinking	41	47
Public drinking	31	51
Aggressive behaviour	31	31
Urination	23	27
Fighting / violence	13	7
Vomiting	12	5
Criminal damage	10	5
Lewd behaviour	4	8
Total	473	482

329. An obvious and major difference is the larger number of ‘drunken noise’ incidents related to Bedford’s larger night-time economy. i.e. even with twice as many hours observation in Hounslow, the total number of recorded incidents of this type was almost the same (157 incidents in Hounslow vs 139 in Bedford).

330. This suggests that there may even be a linear relationship between the number of night-time economy venues clustered together and the number of noisy drunken incidents that take place in any given location with a night-time economy.

331. Other incidents we associate with the night-time economy (urination and vomiting) are also commensurate with the presence of a larger and more intense NTE in Bedford than in Hounslow. So, with only about half the number observational hours in Bedford, we see similar volume of urination incidents (so about half the per hour ratio) and 12 incidents of vomiting in Bedford vs 5 in Hounslow.

332. This ratio of twice as many incidents and only just over half as much observation is similar for fighting (which in both locations took place exclusively around the night-time economy), albeit on occasion daytime drinkers can get into aggressive confrontations with each other but it's much less common). The ration is also similar for criminal damage.

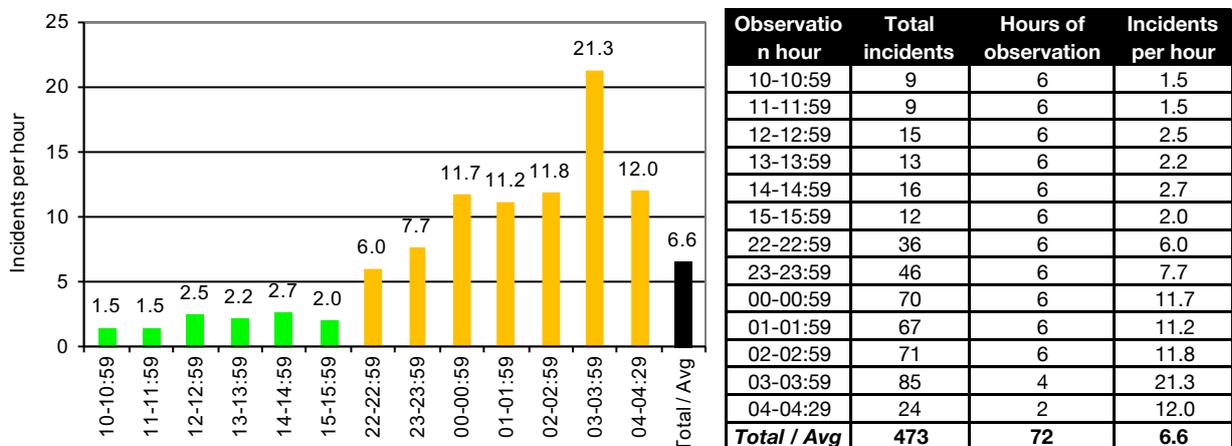
333. The evidence from both locations shows us that where there is an intensification of night-time economy uses, there is an increase in public place incidents associated with the excessive consumption of alcohol (and possibly to a lesser extent the use of illegal drugs)

334. It also tells us that daytime street drinkers tend to be small in number but cause a disproportionate scale of nuisance, public safety and criminal problems, a phenomenon that was not just noticeable in our observations but was observed by the public in response to our survey and the surveys undertaken by the council.

8.2.1.2 Incidents observed by time of day /night

335. Below we show the same data as above but analysed by the hour of the day and night when the research was undertaken.

Figure 34. Incidents observed in Bedford town centre by hour observation slot



336. The number of relevant incidents is lowest during the day (the green bars in the chart above). These are mainly street drinking related activities.
337. Throughout the evening, but particularly the early hours, the number of incidents observed increased. This is typical of every study we have undertaken. However, the exact pattern and the intensity varies by location, reflecting the closing times of late night pubs, bars and clubs.
338. So, for example in Liverpool, which has 06:00hrs and 07:00hrs club and bar licences, problems associated with them continue until these hours and slightly afterwards as customers disperse.
339. Our observations, as well as talking to stakeholders including the police and operators, showed that socialisers who visit the night-time economy in the High Street arrive later than they did pre-Licensing Act 2003. So, on Fridays and Saturdays, it is only from 22:30hrs (and mainly between 23:00hrs and 00:00hrs) that taxis arrive or that friends / parents drop off clubbers in the High Street. Many of them have clearly pre-loaded as they are already intoxicated (this can be identified by their lack of inhibitions, shouting and drunken movements).
340. They then move between venues between midnight and 01:00hrs and it is during this time is when considerable rowdiness happens and occasionally flashpoints between drunk, almost exclusively male, participants takes place.
341. The exodus of socialisers starts at around 02:00hrs, depending on whether it's a Friday Saturday night (the former is a little earlier). The flow continues to increase with most people deciding to find a taxi between 03:00hrs and 04:00hrs. At 04:00hrs, Vogue, Empire and Yate's disperse their last customers (other venues have closed at 02/03:00hrs).
342. There was clear observational evidence that between 00:00hrs and 02:59 as people move between venues or leave them to go home, whilst most are well-behaved, there is a notable but small minority who are not. Because this minority of less-responsible individuals are out on the street at these times and are prone to negative behaviour, this leads us to observe this consistent number of around 11-12 incidents per hour, prior to a peak of around 21 incidents per hour at 03:00-04:00hrs. This penultimate hour is when the maximum number of most highly intoxicated individuals are on the street.
343. Thus, whilst the police presence deters *some* behaviour and allows a rapid and effective response to serious incidents, low-level public nuisance remains high during this time.
344. Between 04:00hrs and 04:30hrs, whilst our time spent observing was limited to four Friday and Saturday nights, this is time is when the street is at its most fractious. So, whilst overall incidents are lower than the hour before - simply because there are less people on the street, those incidents that do happen tend to be more intense and occasionally violent.
345. It is the most fractious because at this point the most intoxicated individuals (and arguably those least capable of managing their own behaviour) have remained in the venues - they may

have wanted to continue dancing, drinking and socialising. Thus, we see a repeat of pre-Licensing Act 2003 nightclub ‘kicking out time’, albeit with a better infrastructure (e.g. taxi marshals, Street Angels), but with considerably more intoxicated individuals, some of whom were visibly unhappy at being asked to leave premises.

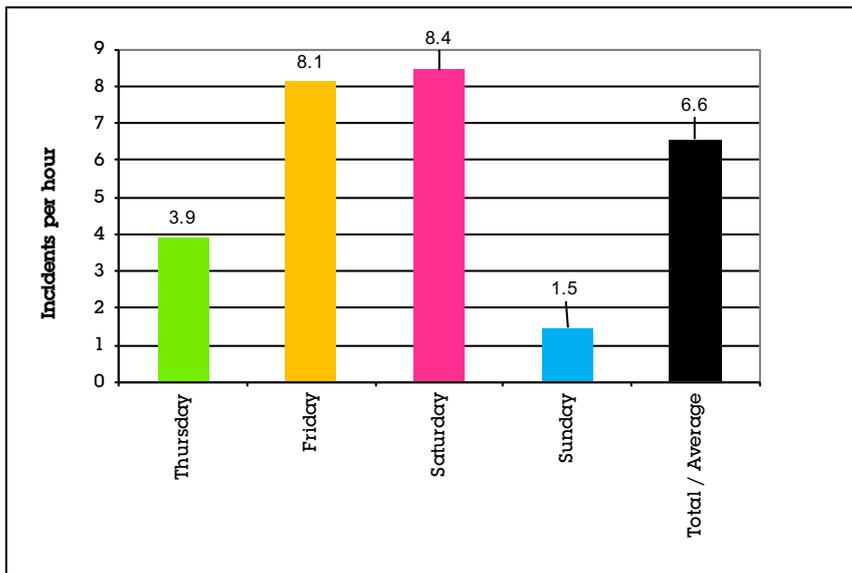
346. These individuals are dispersed by door staff (in a professional manner during our observations) but then are in the public domain. Most are not causing problems to others but the level of drunken behaviour (staggering, examples of people not being able to get up off the floor having fallen) and noise is incessant and very high.

347. At around 04:30hrs, when we closed our observations, the town was mostly empty but for around 50 to 100 individuals – alone or in groups - waiting for a taxi or lost. There were no visible police on foot patrol post-04:15 on our observation nights and the Street Angels appeared to have finished their shifts (NB the police of course remain on call).

8.2.1.3 Incidents per hour by day/night of the week

348. The chart below shows how the incidents we observed were divided by observation days (NB these are ‘weighted’ to take account of the extra hours observed on Fridays and Saturdays).

Figure 35. Incidents per hour by day/night of the week



349. As noted previously, Friday and particular Saturdays are the most intense for incidents observed. This in terms of both number of incidents but also in numbers of visitors.

350. What is particularly interesting is just how quiet Sunday is. This is both beneficial for residents and the police when dealing with the behaviour of some intoxicated people. However, from a broader perspective, Bedford town centre is something of a tumbleweed town and clearly

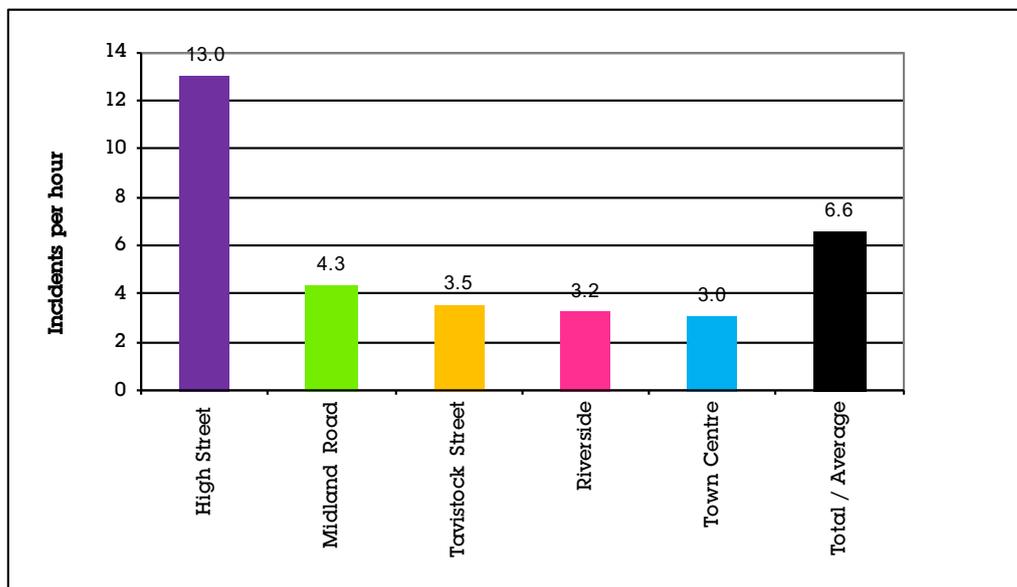
needs a more diverse leisure offer to attract a different clientele in the early evenings (the Riverside North development is a positive start for this).

8.2.2 Incidents per hour by location

351. The following table and chart shows the number of incidents in the five observation zones in the town centre. (NB these are weighted to take account of the different number of hours observed at different locations).

Figure 36. Incidents per hour by observation zone

Location	Total incidents	Hours of observation	Incidents per hour
High Street	292	22.5	13.0
Midland Road	76	17.5	4.3
Tavistock Street	39	11	3.5
Riverside	34	10.5	3.2
Town Centre	32	10.5	3.0
Total / Average	473	72	6.6



352. Even when weighted to take account of the extra time spent observing the High Street zone, the number of incidents in the High Street and its surrounding streets are three times that of Midland Road. They are almost four times that of the three other zones.

8.2.3 Summary

353. Overall, it is clear that there is a substantial amount of low-level negative behaviour contrary to the three relevant licensing objectives linked to users of the town’s licensed economy.

354. In particular, we observed considerable drunken noise, intoxicated erratic behaviour and littering, and to a lesser extent, urination and vomiting and occasional violence from users of the town’s night-time economy on Friday and Saturday nights.

355. There were fewer problems observed in Midland Road and Tavistock Street, but residents’ own views were supported, particularly around aggressive begging and alleged drug dealing.

9 FINDINGS: By location

9.1 Background

356. The following section briefly profiles the findings about each of the zones in the town centre and area of concern. This will be of use when deciding how to revise the borough's licensing policy.

9.2 Zone 1: The High Street

9.2.1 About



357. The High Street zone is bounded to the north by St Peter's Street and to the south by The Riverside zone. St Cuthbert's Street and Newnham Road demarcate the eastern limit of the zone. The Town Centre zone (see next) is the western boundary.

358. As noted previously, most of our observation time was spent on the High Street itself, and on its side streets St Paul's Square, Mill Street, Lurke Street and Howard Street. We did, however, undertake patrols around the quieter side streets in the Castle area to examine for any nuisance behaviour on routes away from the High Street.

359. The greatest number of the town's licensed on-premises are in this zone, particularly along the High Street itself. The southern half of the High Street (from Mill Street to the river) has the highest concentration of alcohol-led licensed premises in the town.

360. The area contains the following 11 licensed late-night alcohol-led premises: Vogue / Yates's / Empire / Vodka Live / The Pad / Faces / Cross Keys (a traditional pub but open late) / The Rose (a traditional pub but open late) / The Standard / The Auction Room / The Exec Club / Bears & Tales.

361. Most of these venues are open until between 02:00hrs and 04:00hrs on Friday and Saturday. They close earlier on weekdays and Sunday nights (if they are open at all). The cumulative impact of these venues *does* cause problems, which we explore below.
362. The area is also home to the following traditional pubs which close at 23:00hrs or 00:00hrs most nights: The Bear / George & Dragon / The Mill / the Brewhouse & Kitchen (a modern craft beer pub-restaurant). There does not appear to be any cumulative impact from the customers of these venues.
363. There are also a considerable number of restaurants and some cafés open past 18:00hrs. In the south of the High Street area there are the following restaurants: Nando's, Nazar, Spice Shop, Spaghetti John's, Baja, The Higgins Pantry and McDonald's. The latter operates partly as a takeaway – see below - but appears to serve more seated diners than takeaways in the evening. It closes unusually early for A McDonald's situated in a night-time economy area - at 10pm).
364. In the northern half of the High Street there is Reem, Eatalia and Meatcure (which closed shortly after our fieldwork). Slightly off the map above are Herd and Pizza Express. There do not appear to be any issues associated cumulatively with the presence of these venues.
365. There are several venues that have closed in this area in recent years including HiFi (late bar), Vibe (nightclub) and Modello (bar).
366. The zone also includes several takeaway food outlets with late night (post 23:00hrs) refreshment licences. This includes two Subways, Mario's, Millennium Kebabs and Piri Piri Chicken. Some of the clients of all these venues, either before or after entering, were seen to be problematic (e.g. littering, shouting, aggressive). See below for further details. Police were called to major incidents at Mario's and Millennium Kebabs during our observations.
367. There are very few off-licences in this zone – only Tesco functions in such a capacity here (open until 22:00hrs). Whilst street drinkers do sit in its doorway once it has closed, using it as a site for begging, it does not appear to be a magnet for street drinkers when open. Lidl also has an licence for alcohol off-sales but operates as a conventional supermarket.
368. There are also three mini-cab offices (one on St Paul's Square, one in Mill Street and another at the north end of the zone on St Peter's Street). These are reasonably well managed by the staff but incidents were observed with their clientele (shouting, littering, screaming) whilst they were waiting for minicabs.
369. There is a *moderate* level of residential accommodation in the High Street itself (above some of the shops), and our research showed that the night-time economy does disturb some of the people who live here, with people closing windows when shouting becomes too loud.

370. There are also some recently constructed 100% residential blocks behind the High Street (in the Castle area) where many complainants from the resident survey research live. The streets become almost fully residential very quickly as you move east (within 100m of the High Street) so any negative impacts of those walking nosily home, urinating etc. are felt here as these are very quiet roads.

9.2.2 Issues

371. Four issues were observed in The High Street zone during the research.

9.2.2.1 A. Serious crime and disorder

372. In our experience of larger towns and cities, serious crime around in Bedford's High Street night-time economy is relatively low. However, it is still present to an unacceptable degree and both our observations and police recorded crime show it is linked to users of the night-time economy. Fighting, scuffling and assaults take place. For example, on one occasion we witnessed a man pick up the knife arch at Empire nightclub and use it as a battering ram before being subdued and arrested.

373. Overall, the police have a considerable presence in this area which varies depending on their risk assessment. They respond quickly to incidents and are proactive.

374. However, by improving the quality of the venues in the area and thus discouraging those more aggression-prone 18-30-year-old males from visiting the town, this zone will, over time, reduce the incidents of most serious crime to zero. This should be part of the new licensing policy and the future strategy for the town centre.

375. The current levels of these problems (both from the customers of late-night refreshment premises and from on-premises) is, in our view, sufficient to be considered cumulative impact.

9.2.2.2 B. Noise nuisance from on-premises customers.

376. Whilst serious crime around the High Street night-time economy area is relatively low, noise nuisance is much higher. This is to be expected, but not accepted.

377. Some of this noise breakout is attributable to the design and management of individual venues (e.g. sound leakage from some premises such as Faces which needs addressing) and thus would not be considered cumulative impact. However, High Street venues' customers, once away from the immediate vicinity of its 11 premises, can and do become a cumulative impact *public nuisance* issue.

378. In a busy town centre with no residents, noise would not necessarily be a major concern, but because there are apartments above the shops and in residential areas such as Castle quarter,

this noise *public nuisance* will certainly impact on local residents. This is reinforced by our own observation and the surveying of residents.

379. As we noted in the previous sections, the High Street area suffers from considerable noise from those arriving there and then moving between and leaving venues during the hours of 22:00 - 04:30hrs. At times the scene is chaotic and the volume (noise not quantity) of screeching, shouting and chanting is as high as we have seen anywhere in the UK (Cardiff and Blackpool aside).

380. Many individuals continue making noise as they walk away from venues as the night closes - towards the bridge, through the town centre and north via The Broadway, St Peter's and Tavistock Street, all at times when most residents are sleeping.

381. The current levels of these noise problems are, in our view, so high that they are more than sufficient to be considered *public nuisance* cumulative impact.

9.2.2.3 C. Litter, urination and vomiting

382. Around the high street there is a serious *public nuisance* problem, with litter from takeaways at night. Here, most of the takeaways are open until at least 03:00hrs and some until 04:00hrs. Many customers do try to put litter in the bins, but many are so intoxicated that they just drop their kebab / chicken wrappers on to the floor. This problem is worse in other locations we have assessed, e.g. Cardiff, Bournemouth, but it still creates a deeply unpleasant street scene. As a result, the council / BID could consider a later cleansing regime. (NB on Saturday and Sunday mornings we saw an excellent clean-up operation by the council's contractors).

383. The vomiting and urination problem can be ranked as 'typical' for this scale of late-night economy in our experience. For urination problems, pop-up urinals or public toilets would help, as would further enforcement of the law, but it is ultimately highly intoxicated (males) that are the cause of this problem. Only by changing the *type* of customer through changing the operational *style* of premises to attract a better quality of customer at night, would this be wholly solved.

384. Vomiting remains a problem – with the nightly piles of vomit on street corners from those who have consumed too much alcohol. Whilst there does need to be regular server training so that all staff are refusing to serve drunks, with the rise of pre-loading and social groups sending the least intoxicated individual to the bar to buy more drinks, it is hard to make much further impact in this area.

385. The Street Angels perform an excellent job of looking after those who have consumed too much alcohol, and in particular, intoxicated vulnerable females who may be subject to predatory males.

386. This is considerable evidence of cumulative impact in this area for *public nuisance* linked to street scene issues.

9.2.2.4 Public safety

387. The High Street area at night is subject to aggressive beggars (residents, recorded crime and our observations confirm this). Occasionally there were unpleasant and aggressive exchanges between these beggars and user groups in this area. This will certainly impact upon feelings *public safety* (as noted by residents).

388. The aggressive nature of some of the users of the night-time economy is also a public safety problem. Even when they are 'only' play fighting or being aggressive amongst themselves, the behaviour between midnight and 04:00hrs creates a hostile environment for residents, hotel guests and other NTE users (e.g. pubs, restaurant clients) to walk through.

9.2.2.5 Cumulative impact

389. The areas in the High Street zone that are affected by all types of cumulative impact are The High Street (full length), Mill Street (full length, lessening eastwards), St Paul's Square (north and east), Silver Street (eastern end), Howard Street (all), Lurke Street (western half), Lime Street (eastern half), and to a lesser extent Castle Lane, Ram Yard, Dame Alice Street and Duke Street.

9.3.2 The issues

9.3.2.1 A. Litter

394. There is considerable littering in the pedestrianised part of the town centre zone. Most of this comes from daytime customers and whilst some is linked to takeaways, such as Costa Coffee and Burger King, these do not operate as late-night refreshment premises, so they cannot be considered under licensing cumulative impact.

395. Regardless of this, because there is so much littering in the town centre zone, it is an area that the town's BID and the council should look to address. The problem is exacerbated because, whilst the street cleaning the following morning is excellent, from late afternoon, particularly on Saturdays, littering is substantial and creates a poor image of the town. This certainly affects civic pride (as residents note) and it probably impacts upon user perceptions of *public safety*.

396. There is occasional littering from pre-loaders leaving bottles on their way through the town centre to the High Street on Friday and Saturday nights.

9.3.2.2 B. Street drinking

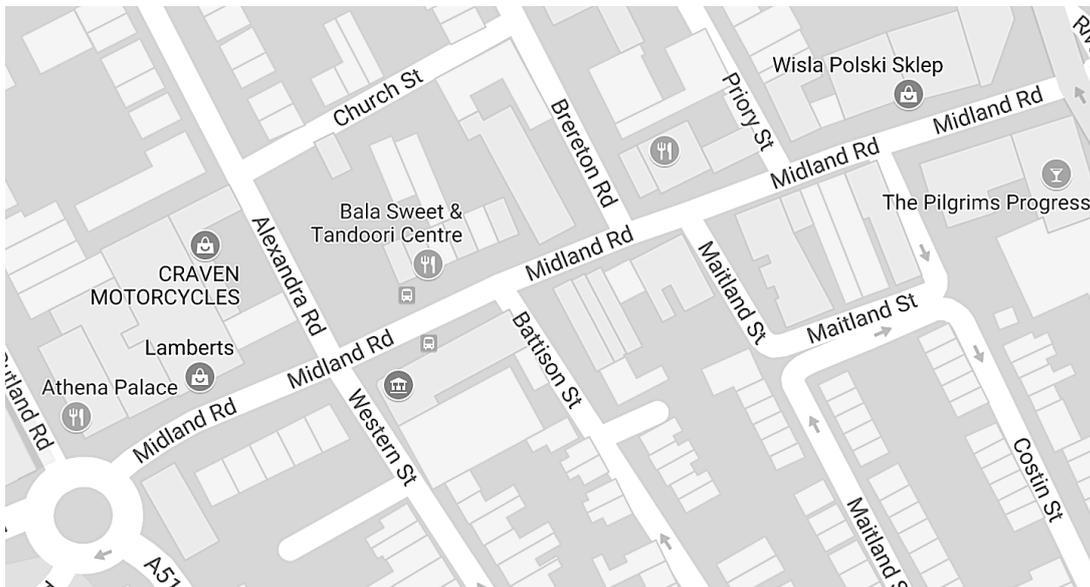
397. There is some street drinking throughout the pedestrianised town centre, but particularly on the benches at the eastern (pedestrianised) side of Midland Road - opposite Tesco. They leave cans and bottles next to the benches. Residents mention seeing this on a regular basis and it is something we also witnessed. Some street drinkers can also be seen around the pedestrianised spaces of Harpur Street.

9.3.2.3 Cumulative impact

398. We don't see any cumulative impact on any of the licensing grounds in the town centre at present. It is more that the Town Centre zone is affected from users of its neighbouring zones.

9.4 Zone 3: Midland Road

9.4.1 About



399. Midland Road is comprised of two distinct sections – the pedestrianised east (that is part of the town centre zone) and the traffic-laden west. When residents talk about Midland Road, they invariably mean this western end of the street, with its mix of retail, personal services, takeaways and off-licences.

400. Midland Road is vibrant and provides lots of important local services, however it also feels – in our experience and that of many residents – ‘edgy’ (see below). It is ‘down at heel’ and ‘rough round the edges’. Yet in many ways it is thriving with high footfall and many businesses that are clearly successful. It has huge potential for further improvement given the large number of residents locally who depend on its services.

401. There are very few on-licensed premises on Midland Road with just four pubs and bars: Wetherspoon’s Pilgrim’s Progress, City Café, The Paddington and The Grafton. There does not appear to be any major issue of cumulative impact linked to the presence of these four venues, albeit occasionally a customer can leave any one of those four above in a noisy fashion, but at present there are insufficient numbers for pubs to be considered cumulative impact.

402. However, there are seven off-licences: Euro Convenience Store & Off Licence, Lambert’s, Midland Food & Wine, Euro Market, Midland Local Store, Wisla and Baltika. This is a very high concentration in a street that is only 0.2 miles in length. Residents, police incidents and our own observations link the purchase of alcohol in these venues to problems caused by their purchasers, such as street drinking, noise, nuisance and litter.

403. There is only one sit down restaurant (not takeaway) – the Athena Palace (at the western end of the street). We observed no issues with this venue.

404. There are ten takeaways that open until later in the evening (most have post-23:00hrs late night refreshment licences: Tikka Masala, Flying Pizza, Al Jannat, Bala, Royal Peri Peri, Spicy Grill, Dixy's, Al Badar, Bedford Pizza and Kebab House and Al Fairoz. (Domino's closes at 22:45hrs).

405. There are three main issues that affect Midland Road.

9.4.2 The issues

9.4.2.1 A. Street drinking, crime, public safety and public nuisance

406. Midland Road feels unsafe. Residents from the local area and from Bedford more generally tell us this in their hundreds. Our observations confirm this. This is almost exclusively due to the small number of street drinkers (particularly at the western end of the road) and the alleged drug dealing (we witnessed what appeared to be a number of deals taking place during the day).

407. This clearly impacts hugely on feelings of public safety and the reputation of the area.

408. It important to note that the off-licences here are not necessarily the cause of the problem themselves (albeit if they are serving intoxicated individuals they are and more could be done to ascertain this). But rather, they are the licensed venues from which the street drinkers gain their alcohol. Thus, we did witness street drinkers emerging from off-licences with cans and beer in their hands before drinking on the street or heading to locations such as the Riverside to consume with their friends in a more secluded location. Therefore, the (relatively) large number of off-licences on Midland Road, all of which sell strong lagers and white ciders, are *enabling* the problem.

409. Most street drinkers in the area *are* generally well-behaved, but there is the likely drug dealing as well as some instances of aggression and fallings out between themselves, as well as some aggressive begging and intimidation of passersby. Residents here also note urination and occasional defecation which they allege is by street drinkers.

410. If the off-licences were not here, whilst some street drinkers might remain in the location (there are at least two hostels in the area), most would go elsewhere because street drinkers tend not to want to travel a long way to purchase alcohol.

411. Thus, there *is* cumulative impact in Midland Road because the off-licences are the reason for the retention of street drinking individuals the area. There is clearly competition between the off-licences on product and price and we know from academic evidence that the more opportunities there are to buy alcohol, the more will be consumed. This is particularly the case

if some retailers have lower standards about whom they are prepared to sell, such as those who are substantially intoxicated.

412. These drinkers also leave cans and bottles around Midland Road, particularly the benches to the eastern side of Midland Road in the town centre zone (opposite Tesco Metro).

9.4.2.2 B. Noise nuisance from NTE users

413. Because Midland Road has only one late-night on-licensed venue - City Café (e.g. on one night of our observations had a loud and raucous party until at least 03:00hrs) - it is a relatively quiet street post-midnight. This is certainly the case relative, say, to the High Street. It is noise from those travelling home along the road from the High Street clubs and bars that tends to punctuate the streets soundscape. This is similar to Tavistock Street but it is slightly worse because there are more late-night takeaways here (see below).

9.4.2.3 C. Takeaway and litter nuisance

414. Because there are so many takeaways, there is inevitable littering (throughout the day) including post-23:00hrs when they become licensed premises. This is in not as severe as littering from those using the night-time economy venues in the High Street zone, but it is both unnecessary and messy for residents. It will not help perceptions of the road or the wider area's reputation.

9.4.3 Cumulative impact

415. The evidence strongly suggests there is *crime*, *public nuisance* and *public safety* problems associated with off-licenses and late-night refreshment premises located in Midland Road. The area affected is mainly Midland Road itself, albeit if the council did want to introduce a cumulative impact policy, it would almost certainly need to include some of Bridge Street to prevent displacement of new off-licences to this location.

9.5 Zone 4: Tavistock Street

9.5.1 About



416. Tavistock Street consists mainly of a mix of local retail, residential, services, takeaways and Bedford's impressive cluster of South Asian restaurants. During our observations, none of these restaurants appeared busy, even on Friday and Saturday nights. Whilst outside the bounds of our brief, this is an area that requires attention in terms of promoting this unique offer.

417. Whilst most of these restaurants also offer a takeaway service they remain first and foremost sit-down restaurants and do not cause problems.

418. There are also a number of dedicated (or predominantly) takeaways, including KFC, Peri Peri Grill and Pizza, Andrea's Kebab and Chicken shop, King Kebab and Dixy Chicken that operate on late night refreshment licences (some until 03:00hrs on certain nights). There are also some traditional Chinese-type takeaways, but these are closed before 23:00hrs.

419. In terms of alcohol-led licensed venues in the Tavistock Street area, there are very few: Six's is at the street's southern end; in the middle is The Flower Pot live music pub (from which occasionally noisy customers and sound leakage do occur) and Noble Rot wine bar, whilst the Tavistock Carvery and Family Pub is located at the street's northern end.

420. There are four off-licences on Tavistock Street, including Sainsbury's Local, Premier Off-licence, Tavistock Wine and Londis. This is a relatively large number for such a residential neighbourhood.

9.5.2 The issues

421. There are three main issues related to license premises and their customers in the street.

9.5.2.1 A. Street drinking & nuisance

422. Residents report considerable street drinking in the Tavistock Street area. We observed only a small amount but when we did observe it, some was linked to noise, occasional aggression and broken bottles and cans being left on the street. Sometimes drinkers would purchase cans of beer and cider in the off-licences and then open them, drinking them as they went towards town for a night out (public drinking) or to join other street drinkers on St Peter's Green.

423. The main area for street drinking is outside St Peter's Church (and sometimes inside the grounds). In particular, the space on St Peter's Green is both dark and intimidating at night and there are reports from residents (and which we also experienced during our observations) of aggression from out of the darkness by highly intoxicated street drinkers.

424. There is some urination in side alleys and gardens from both street drinkers and those using the town centre's night-time economy.

9.5.2.2 B. Littering

425. There are moderate levels of littering in the area linked to users of the takeaways. One localised hotspot is outside KFC (see images in the *Appendices*). Indeed, some way from KFC branded litter can be found in the High Street. Users of other takeaways also create litter problems and this is then left for residents in the streets to experience before the council cleansing team removes it early the following morning,

9.5.2.3 C. Late night noise

426. Tavistock Street is one of the main arterial routes out of the town centre for those who have been visiting the High Street's night-time economy area. They are often loud and some take part in drunken behaviour in the street. Whilst not on the scale of the noise found in the High Street zone, because of the apartments above many of the shops, the residential blocks that directly front Tavistock Street and the highly residential nature of the side streets, any sporadic late-night noise is problematic, particularly in summer when many people leave their windows open for ventilation (something we observed during our fieldwork).

9.5.3 Cumulative impact

427. In terms of cumulative impact, there is, in our view, sufficient evidence that there is negative impact around takeaways and street drinking / off-licences, should the council wish to take action to resist some or all new licences. There is limited impact from on-premises so this would be more difficult to sustain but could be given a 'watching brief'. Indeed, further opening of 'aspirational' licensed venues, such as Noble Rot, could be of use in diversifying and reviving the street.

428. When the council consulted on its 'area of concern' it included around half of Tavistock Street and some surrounding streets. Our research suggests that if the council wished to introduce a cumulative impact area in this zone, it would be feasible to consider also including the north-west end of Tavistock Street. This is because there is noise, litter, occasionally urination and other low-level ASB clustered at this end of the street.

9.6 Zone 5: The Riverside

9.6.1 About



429. The Riverside zone, for our purposes, stretches from Bridge Street to the Embankment. The original 'area of concern' included the narrow strip south of the river including the college, Park Inn etc. We saw no evidence that there were any problems with this area and it was not mentioned by residents as an issue, nor is it a crime / ASB hotspot.

430. The only licensed venues in this area, other than the rowing clubs, are the new restaurants at Riverside North (such as Wagamama) and the hotels, such as the Park Inn and The Swan. The Swan Hotel's bar is popular in summer, but its clientele does not appear to cause any issues at the venue, either during nor upon arriving or leaving.

9.6.2 The issues

431. The two issues that do manifest themselves in the Riverside zone are relatively limited and do not come from any of the customers of the licensed premises in the zone, but from elsewhere in the town centre.

9.6.2.1 A. Street drinking

432. There is a street drinking issue which we observed during the day and as frequently noted by residents. This occasionally leads to aggressive incidents between street drinkers, aggressive begging and urination. Street drinkers use the Riverside area, particularly near the Star Rowing Club. It is quiet and they must believe it is out of sight. Yet a large number of residents reported this as a serious problem, so it is clearly not as out of sight as street drinkers may think. They also leave bottles and cans here.

9.6.2.2 B. Night-time economy noise

433. The riverside is a naturally quiet place and therefore any sporadic noise has a disproportionate impact on residential amenity. With the new residential development at Riverside North this

means we could see an increase in noise complaints, particularly in summer months when the new residents are enjoying their balconies, even if noise linked to users of the night-time economy on dispersal remains at its current levels.

434. The noise comes not only from street drinkers but particular from a small number of individuals who use the riverside west and Embankment east to approach the town's night time economy or to walk home after a night out. Whilst there are not a huge number of incidents, those that *are* connected to the town's licensed economy are sufficiently loud to disturb residents and hotel guests.

9.6.3 Cumulative impact

435. In terms of cumulative impact, there is, in our view, no evidence that there is any negative impact from premises located here at present.

10 CONCLUSIONS

10.1 General

436. Our overall conclusion is that, in some areas and at certain times, central Bedford *is* affected negatively by customers of licensed premises. Sometimes substantially so. It is by no means universal and the impact of the licensed economy on the three relevant licensing objectives is unusually complex for what is a relatively small town.
437. It is our view that there *is* sufficient evidence to support the introduction of a cumulative impact policy (CIP) zone or zones should the council wish to do so.
438. Relative to other areas we have studied, there are certainly cumulative impact issues in the **High Street** zone (for night-time economy pubs, bars and nightclubs, as well as takeaways), in the **Midland Road** zone for off-licences and takeaways, and in **Tavistock Street** - also for off licences and takeaways.
439. The **town centre's** pedestrianised heart and **riverside** zone are currently not substantially affected by the behaviour of customers of the licensed premises located within them. However, sometimes people who have used licensed premises in other areas, such as the High Street, do walk through them causing problems.
440. The council now has some of the most extensive evidence anywhere in the UK of the impact of Bedford town centre's licensed economy on three of the four licensing objectives, as well as more broadly on residents and the town centre as a destination and the flagship for the borough.
441. The council can now use this research, alongside other evidence at its disposal, to develop its new licensing policy and consider whether it should introduce a cumulative impact policy and, if it does so, what boundaries and types of premises should be included.

10.2 By location

442. The area most affected by the negative cumulative impact of customers of licensed premises within the town centre is the **High Street** and its side roads and alleyways. The zone's night-time economy is a major source of the town and borough's *crime and disorder*, but also *public nuisance* from substantial noise and littering, as well as vomiting and urination. It is not so much the number of premises here (which is not huge compared to many other night-time economies), but the lateness and the type of clientele they attract which makes it problematic.
443. However, it is important to note that Bedford's night-time economy is a significant attraction, employer and service that is enjoyed by many in a respectful manner.
444. Yet, it is also clear that the 'monoculture' of alcohol-led venues in the High Street zone is deterring residents from passing through this area – it feels like a 'no go' space for many.

445. **Midland Road** is also problematic, but in a different way. It suffers from street drinkers who purchase alcohol from the off-licences located here. Some then become aggressive, contribute to littering and noise and engage in potential drug purchasing. This has a substantial negative impact on residents' feelings of *public safety*. There is also some noise and litter *public nuisance* from those later night socialisers walking home and using the takeaways here.

446. **Tavistock Street** is less affected than the two most impacted zones above but residents still experience *public nuisance* from street drinkers here as well as noise and litter linked to them and the off-licences they frequent. Night-time economy users returning home very late can also sometimes be noisy or urinate in gardens which is a *public nuisance* issue.

10.3 By day

447. The main days of the week for negative impacts on the licensing objectives, such as the noise, fighting and urination that are associated with on-premises (i.e. pubs, bars and clubs) are **Friday** and **Saturday** nights. This is typical of most town centres in the UK.

448. There are fewer issues on **Thursdays** and **Sundays** than in many other locations we have studied. We believe this is because Bedford is a very 'weekend-oriented' town.

449. Takeaway litter appears to be generally consistent throughout the week in Bedford, but with a spike on Saturday in the town centre between 0:00hrs and 04:30hrs. This is seen most obviously in the High Street zone where kebab wrappers and chicken boxes are discarded freely.

450. However, unlike towns that have very large late-night economies, considerable numbers of intoxicated customers and a large choice of very late hot food refreshment premises, we do not see 'litter mountains' between 01:00hrs and 04/05:00hrs on **Saturday** and **Sunday** mornings. However, despite this, there is no attempt by businesses to contribute to the cleansing of the mess made by their customers late at night /early hours.

451. For off-licensed premises, specifically convenience stores, street-drinking and the purchase of alcohol associated with them occurs throughout the week, albeit it is less pronounced on Sundays.

10.4 By time

452. For **on-licensed** premises the pattern is clear: between 23:00hrs and 04:30hrs (on weekends) is the main time for issues of *crime and disorder* and *public nuisance*, albeit there are a small number of incidents in the evening and isolated ones in the afternoon.

453. For **off-licences** and street drinking, drinkers are purchasing and consuming alcohol throughout the day from these stores. However, incidents linked to this behaviour peak between 11:00hrs and 18:00hrs.

454. For **takeaways**, the impact is mainly from 00:00hrs through to 04:00hrs (when the last late-night refreshment licences close).

10.5 By licensing objectives

10.5.1 Crime & disorder

455. This licensing objective has the potential to make the greatest impact on people's lives, e.g. serious injury from violence and sexual violence (albeit it also includes robbery and criminal damage). Based on MAKE's experience, we would say that Bedford town centres suffers from **low** levels of crime and **moderate** levels of disorder linked to its night-time economy and to off-licences and street drinking.

456. This observation is relative to the very high crime areas where we have worked e.g. Clapham, Brixton, the West End of London, Liverpool and similar hotspots. Bedford's small number of venues, the tightly clustered late-night premises and the police presence on Friday and Saturday night all help reduce (though not minimise) the impact on the town.

10.5.2 Public nuisance

457. The largest impact observed throughout the five town centre zones is *public nuisance* and this is linked to people using takeaways, off-licences, street drinking and those leaving on-premises.

458. The two most common nuisance issues are noise and litter.

459. Noise is often made worse because within the 'area of concern' because there are pockets of highly residential land use, even centrally (e.g. Sovereigns Quay, above shops on the High Street, Castle Quarter, and it only takes a small number of intoxicated individuals behaving badly to create problems for residents).

460. Litter, both takeaway packaging and street drinking vessels, is a considerable *public nuisance* issue in Bedford. Another issue we noticed is that occasionally glasses and bottles are taken out of pubs and bars at the end of the night, but this happens less than in other areas we have worked, suggesting door staff are doing a reasonably effective job here. However, the town must remain vigilant on this issue as glass vessels present a potential *public safety* hazard in the event of fights in the public realm.

10.5.3 Public safety

461. *Public safety* is the most underappreciated of licensing objectives, particularly in assessing cumulative impact our experience. It was clear from the surveys that negative behaviour of users of licensed premises seriously influences feelings of personal safety of Bedford residents whilst out and about in the town – day, evening and night. There is also ample academic evidence that violence, aggression, shouting, urination and littering within the licensed economy hugely influences how safe people feel.

462. Therefore, within the ‘area of concern’, it is clear that public safety must be affected in a number of locations. Most obviously this is from intoxicated and aggressive or loud people in the High Street leaving venues at night, but also the intimidating behaviour of some street drinkers or those using takeaways.

463. There is a huge amount of concern from residents in the Midland Road area about the street drinking issues here and its link to off-licences, as well as some of those rough sleepers or those ‘hanging around’ here allegedly supporting drug dealers who frequent the area.

464. Alcohol and takeaway litter may also impact negatively on people’s perceptions of how safe their neighbourhood is, e.g. the High Street and its surrounding residential areas such as St Peter’s, Mill Street, Howard Street, Castle Road and Castle Lane.

10.5.4 Protection of children from harm

465. During the research, there were no observations of children (i.e. those who appear under 18) accessing alcohol directly or via proxy purchase from off-licences, nor gaining entry to on-premises.

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12 APPENDICES

12.1 Appendix 1. MAKE, biography

Alistair Turnham founded MAKE Associates in 2008. His specialist subject is the evening and night-time economy, a phrase he created in 1994 when he undertook a number of degrees in the subject.

In 2007, he was appointed as a technical **special adviser on the night-time economy to Department of Communities & Local Government**. Until 2010, he worked across government, including with the Home Office and the Department of Culture, Media & Sport, raising the profile of and policy responses to the night-time economy post-Licensing Act 2003 reform.

He has since completed a futurecasting study for the Department of Communities & Local Government (CLG) on how the UK's night-time economy would change by 2020 and helped develop CLG's *How To... Manage City Centres* programme. His thinking on this helped inform the **Purple Flag scheme that he co-developed** with Paul Davies of the Civic Trust (now of NightWorx and the Home Office's Local Alcohol Action Areas programme).

Alistair has been involved with over **100 night-time economy projects** for city centres across the UK from Liverpool to Preston, Oldham to London's West End. He also pioneered the concept of the '**night-time economy cost-benefit analysis**' which he first trialed in Sydney's for the city's Mayor, Clover Moore. This intellectual property forms the basis of the 'NightMix' Cost Benefit Analysis study commissioned by Westminster City Council from our former partners TBR Economics and which is drawn upon as evidence in WCC's current statement of licensing policy.

In 2005 Alistair devised the **first night-time observational study methodology** for councils requiring more evidence on whether to introduce cumulative impact policies (special or stress area policies). Since then his studies and policy advice have been used by the London boroughs of Richmond upon Thames, Westminster, Hammersmith & Fulham, Kingston, Hounslow, as well as Liverpool and now Bedford.

Alistair's latest project, is the **first ever evaluation of 'safe spaces'** (e.g. safe buses and buildings e.g. Nottingham's Malt Cross, Bournemouth's Safe Bus). These schemes provide care for those who intoxicated or vulnerable in the night time economy and MAKE's study of these examines their contribution to reducing alcohol related injuries and crime in town centres after dark. The work is for the Local Alcohol Partnerships Group and is being rolled out nationally in 2017/18 as part of the Home Office's current Local Alcohol Action Areas 2 programme.

Alistair has visited 75% of the UK's 450 largest night-time economies (as ranked in MAKE's own NightMix Index) and he has attended over 1,000 licensed venues across the UK in a professional capacity over the past 20 years.

12.2 Appendix 2. ASB categories

Figure 37. ASB categories used in the community safety analysts' ASB mapping

ROWDY OR INCONSIDERATE	3234
VEHICLE NUISANCE OR INAPP USE	829
ABAN VEHICLE NOT STOLEN	548
NUISANCE NEIGHBOUR	244
STREET DRINKING	207
BEGGING/VAGRANCY	195
NOISE COMPLAINT	152
SUSP CIRCS/INSECURE PREMS/VEH	102
TRESPASS	93
MALICIOUS/NUISANCE COMMS	77
VIOLENCE AGAINST PERSON	74
DOMESTIC INCIDENT	69
CONCERN FOR WELFARE	53
ADVICE/MESSAGES	26
FIREWORK RELATED	24
POLICE GENERATED ACTIVITY	21
OFFENSIVE WEAPONS	20
CRIMINAL DAMAGE	17
CRIME OTHER	16
ABANDONED CALL	15
ROAD RELATED OFFENCE	13
HOAX CALLS	11
FIRE	10
PREJUDICE INCIDENT	10
LITTERING	9
PROSTITUTION RELATED ACTIVITY	8
HIGHWAYS DISRUPTION	7
SEXUAL OFFENCE	7
BREACH OF ORDER	5
DRUGS	5
OBSERVATION MESSAGE	5
PROPERTY LOST/FOUND	3
BURGLARY - DWELLING	2
R.T.C. - SUSPECTED INJURY	2
RAVE OR ANTICIPATED RAVE	2
ROBBERY	2
BAIL ENQUIRY/BREACH	1
CIVIL DISPUTE	1
COLLAPSE/INJ/ILL/TRAP	1
FOUND PERSON	1
FOUND SMV	1
SHOPLIFTING	1
SILENT 999/112 CALL	1

12.3 Appendix 3. Stakeholder groups

12.3.1 Background

1. On 1st December 2017 two interactive stakeholder sessions took place at Bedford Borough Council (BBC) offices. The purpose of the sessions was to introduce the findings of the recently completed MAKE study into licensing for Bedford Borough Council, to gain feedback on the research and to consider specific licensing-related questions around cumulative impact, alcohol pricing, street drinking and the operational hours of licensed venues.
2. The morning session was attended by members of the borough's responsible authorities (i.e. council, police, environmental health and trading standards, public health). The afternoon session also included further representatives from the responsible authorities but also from the town's residents' groups, licensed businesses and the business improvement district. (A full list of invitees and participants is available from Gill Anderson, Head of Licensing, Bedford Borough Council).
3. The sessions were chaired by Alistair Turnham (AT) of MAKE – specialists in licensing research. AT authored the licensing review report for BBC. Also present was independent licensing specialist Jim Ratchford (JR). JR has been asked by BBC to help revise BBC's licensing policy for 2018 to 2023.

12.4 Session 1: Responsible Authorities Group

4. There was broad support for the prevention of sales of single cans and bottles of high strength alcohol ciders and beers from off-licences due to their consumption by street drinkers, particularly in the Midland Road and Tavistock Street areas.
5. There was also acknowledgement of the limitations of this policy given that any agreement *not* to sell certain products or price at an informal floor level may be in contravention of free trade legislation. However, where possible, stakeholders generally felt having it included in the new Statement of Licensing Policy as something that BBC might *expect* to see – where it was relevant and proportionate - on specific licence applications, was appropriate.
6. There was also support in the group for investigating community alcohol partnerships (CAPs) in support of street drinking. AT noted that CAPs now address issues of adult street drinking, not just children using alcohol – which was CAP's initial mission. AT said he would put CAP in touch with the borough. It was noted that it would need to be decided who would take this forward as Licensing do not currently have the capacity to lead on this.
7. There was general support for the continuation of the 1am last entry policy for late night pubs, bars and clubs and that this was about the right time. It was felt that the 1am last entry helped ensure that there were less people on the streets between 1am and 3/4am when these venues

'kicked out' and that, without it, people would come into town even later than they already do, which already causes issues for the police and residents.

8. Whilst not a direct licensing policy issue, Public Health representatives noted that the council's contracts for drug and alcohol treatment and outreach work (often for rough sleeping or homeless individuals with alcohol problems) could be better directed to focus on tackling street drinking with their service users.
9. There was a consensus that the new Statement of Licensing Policy should be clear about what type of licensed economy and evening and night-time economy that the borough wants, particularly in the town centre, where pressures and opportunities are greatest. A vision for where, what time, and what types of licensed operation the borough envisages.
10. A point was made that ambulance call data for the premises where patients were picked up from was not being used more effectively to identify premises that were selling to those already intoxicated. Public health said this was being addressed.
11. Overall, participants were in agreement that a cumulative impact policy *could* help address some of the issues in the town centre relating to street drinking and alcohol related disorder. There was also acknowledgement that it was not a 'silver bullet'.
12. Participants were broadly in agreement that the three areas identified in the research data (the High Street and the streets leading from it, as well as Midland Road and Tavistock Street) were logical locations for a CIP (if the council decides to adopt such a policy one). Participants were also able to give examples in these areas linked to the users of the licensed premises in those locations creating problems under the licensing objectives, e.g. noise, intimidation, aggressive begging etc.
13. One participant also felt that there were some issues related to street drinking and night-time economy users around the bus station area and that this area should be included as well.
14. There was a feeling that, should a CIP be introduced, displacement might occur, but that this was easy to monitor. JR pointed out that they could revise the policy if this was the case – the council was not restricted to cycles of five years for its Statement of Licensing Policy.
15. (Non-licensing issue) Some participants noted that rents and, particularly, business rates revisions were too high in the town centre and that this was impacting on the viability of the existing evening economy and nightlife. Council officers noted that whilst BBC collected business rates it did not set them and passed them to government. However, all the authorities recognised that it was important to support the licensed industry as well as regulate it and enforce against the poor operators.

16. It was considered important to ensure new operators with exciting and interesting additions to the town's leisure economy were not deterred by a cumulative impact policy - if the council was to bring one in.
17. There was general agreement that there should be no post-midnight off-licence operations in the town centre (or borough more generally). This was due to the problems with street drinking, domestic violence and those continuing to drink after a night out.
18. The child sexual exploitation (CSE) work being undertaken through Operation Makesafe was considered important to reference in the new Statement of Licensing Policy. And, to ensure that premises operating in the night-time economy are expected, through their licence conditions / operating schedule (where appropriate), to have a policy, training, systems etc. to identify, prevent and report CSE taking place, specifically in the night-time economy.
19. There was also mention of the recently produced Hertfordshire CSE video that could be referenced in the new Statement of Licensing Policy as a useful source of help for licensees in the NTE.
20. There was general agreement that the SIA (Security Industry Authority) has been fundamental to the good governance of pub, bar and club doors and internal premises in the town. Individuals believed more could be done to use door supervisors to spot vulnerable individuals and potential predatory individuals beyond the immediate vicinity of premises by working more closely together (AT noted Westminster Licensees Charter as an example worth pursuing).
21. There was a general acknowledgment that the taxi marshal scheme that used SIA staff was an essential part of managing the town's night-time economy.
22. There was an acknowledgement that whilst responsible authority engagement with the on-trade was positive, engagement with most independent off-licences remained problematic. Was there a way the new Statement of Licensing Policy could 'strongly encourage' them to better engage with the council as part of being a responsible licence holder?
23. Protecting vulnerable people, particularly women in the night-time economy, was an area of increasing importance. A participant wondered if Ask for Angela (Pubwatch created scheme where vulnerable females can ask bar staff for 'Angela' i.e. to get help) was an intervention where licences could be asked, if appropriate, to have as part of their operating schedule.

12.4.1 Session 2: Residents, Businesses and Responsible Authorities Group

24. The first issue raised by the stakeholders after the presentation was around public place urination. It was acknowledged that many individuals can't get back into premises once they've left and therefore, despite the best intentions of most, some will urinate in the street. This is compounded by the lack of public toilets open after dark (there are none). This doesn't at first appear to be a licensing issue, rather one of public order. However, it is, because the

customers of premises are causing cumulative impact (public nuisance) once they leave. Therefore, it is reasonable to expect licensed premises to address this where possible.

25. One non-licensing-related solution to public urination suggested was to improve the lighting in locations such as alleys around the High Street and Midland Road areas and in particular the alleys leading from the High Street. It was also mentioned that the Corn Exchange toilets could potentially be opened later (at a cost). Was this something that Bedford BID could address? Also, the possibility of pop-up or temporary urinals was also suggested as a possibility that should be investigated.
26. There were differing opinions on the 1am last entry time to pubs, bars and clubs. Most felt it was useful in preventing too many people being out on the street. But some members of the licensed trade were more ambivalent. This was less about them wanting maximum operational flexibility (as is sometimes the case with last entry policies). Rather it was a feeling that it can create problems 20 minutes before closing of some 1am premises when many socialisers leave to go to their final later destination knowing they can't gain entry after 1am. This was seen almost as a return to the 'old days' when there were large numbers of people on the street due to 11pm / 2am closing times. Also, one individual noted that "*people not moving around town would be boring*".
27. One participant noted that there was potential for somebody 'kicked out' of one venue to then potentially enter another before 1am anyway (NB. if Pubwatch is working effectively with radios this should NOT happen).
28. There was no outright opposition to a cumulative impact policy, but one licensee felt that it would be impossible to make a CIP work in practice as venues would then seek to open elsewhere outside any zone(s) (i.e. displacement).
29. There was agreement in the room that, whatever licensing policies were introduced, that they must be mindful that the night-time economy is a "*great industry*" that brings people in to the town centre and supports jobs. Indeed, given the challenge of retail and empty shops it is one of the town's "*bright spots*".
30. There was broad agreement from participants that more police were needed and that PCSOs were not a substitute for this. (NB. The police told the previous group that in 2018 the number of officers on patrol on a Friday and Saturday night would rise from one sergeant and four constables to six constables and a sergeant).
31. It was raised by a resident that it was not right to expect residents to take venues to court. There was a feeling that, at the moment, this was the case, particularly around venue and customer noise from specific premises.

32. Licensees (from on-premises) felt that the £1.50 per pint minimum in the current Statement of Licensing Policy didn't affect them directly as they couldn't sell their beer and lager at such a low price in any case. But they, and residents, were concerned at the low retail prices offered in the off-trade which it was felt, contributed to pre-loading, street drinking and underage sales.
33. The 50p minimum per unit of alcohol was seen by all in this group as of potential value in reducing alcohol related issues (should it come into law) but it was accepted that this might not be for some time yet, if at all. In the meanwhile, the problem seen by the trade was that a voluntary code on minimum pricing (either by £x per pint or per unit of alcohol) is just that, voluntary – and should one licensee refuse to go down this route it could spark a price war leading to a 'race to the bottom'. A voluntary code would need to be carefully and constantly monitored.
34. Street Angels were universally praised.
35. The creation of a place of safety (safe space type scheme) was something considered by some participants as a potentially important development. AT promised to forward his recent report on this issue to BBC.
36. There was general agreement that child sexual exploitation awareness amongst all operators in the NTE was not high enough and this should be a priority for licensing, the police and operators in 2018.

12.5 Appendix 4. Image gallery

Below are images captured during the six observation days and the Friday and Saturday nights when the town is busiest. NB many of these appear to be in the light, despite taking place between 03:00hrs and 05:00hrs. This is because so of the research took place on 17th and 18th June, close to the longest day of the year.

Figure 38. Police are called to an incident at Vogue in the High Street. During our observations, Vogue, Yates's and the Empire (on Mill Street) were the three venues to which the police were called

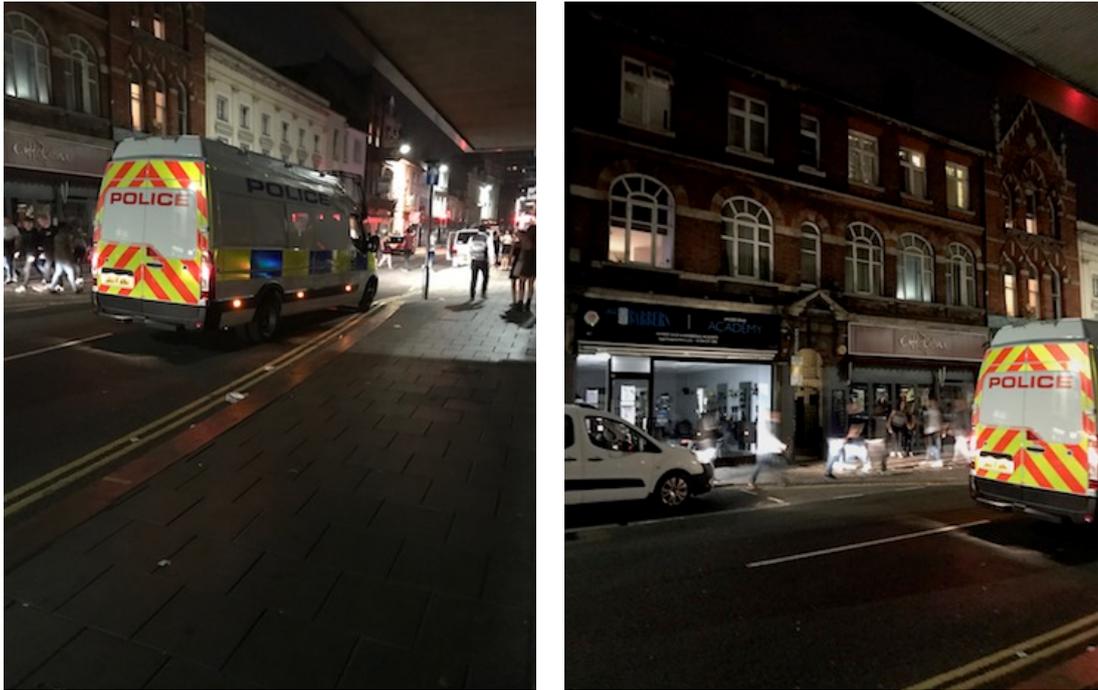


Figure 39. After closing at Vogue and Yates', two women have a heated and highly drunken argument in the street (left). Customers from Faces (right) have a mass stand-off in the street stopping traffic

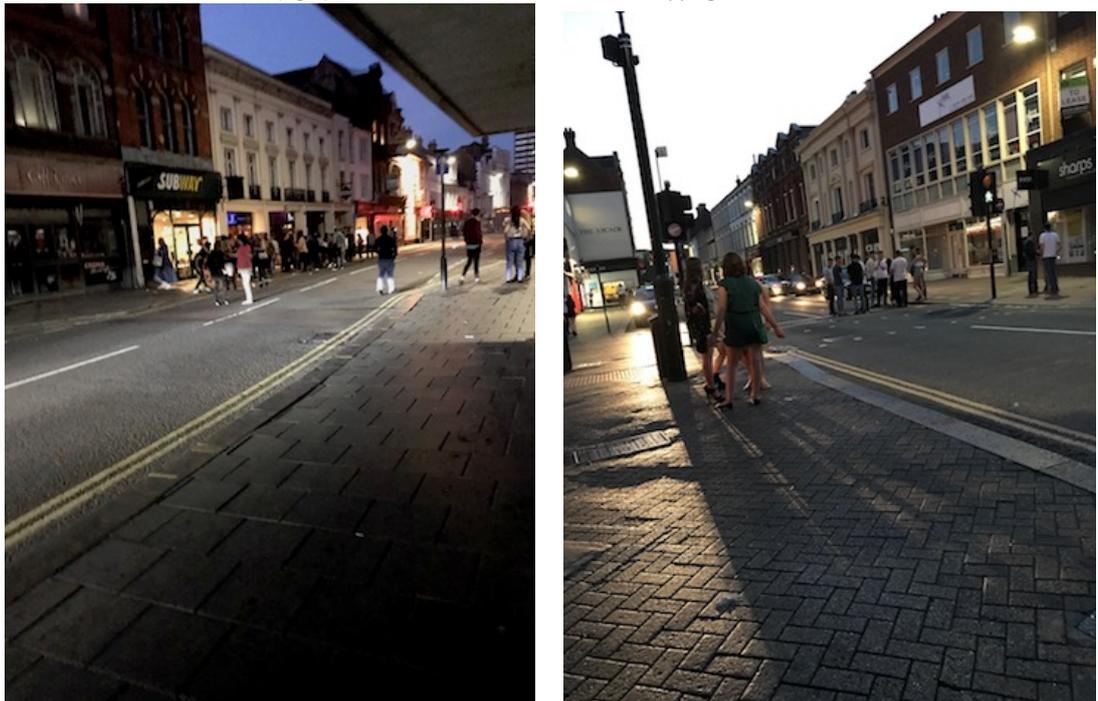


Figure 40. The alleyways off the High Street become magnets for public place urination at night

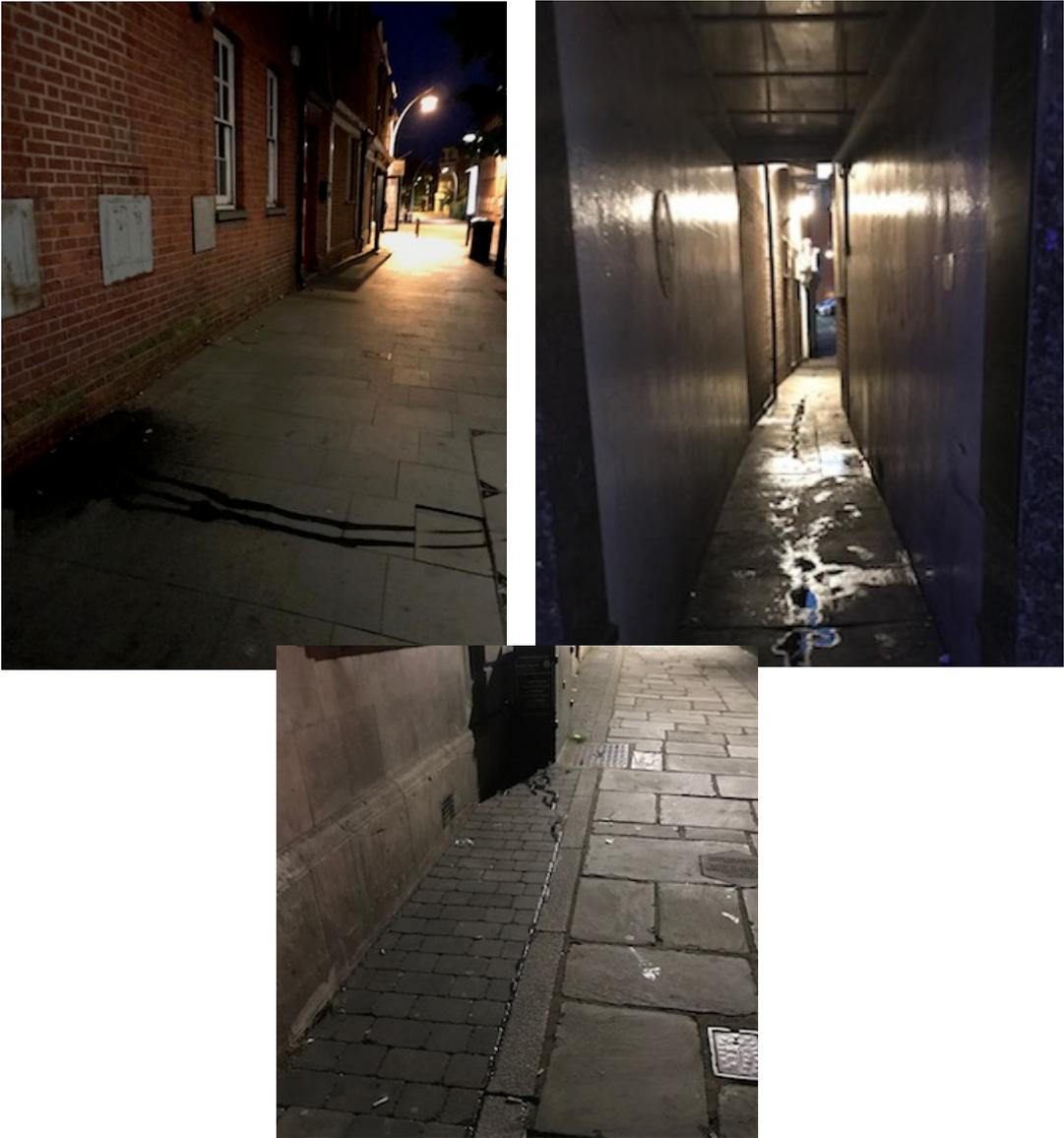


Figure 41. The removal of glass and glass bottles from venues in Bedford by customers concealing them in their clothes is relatively rare. This suggests door supervisors are doing an effective job.



Figure 42. Vomiting linked to users of the NTE is relatively limited in Bedford but it does occur around the High Street and neighbouring roads



Figure 43. Residents and businesses often complain about litter, vomit and urine in their doorways and there is ample evidence that this takes place, particularly in the High Street and its vicinity

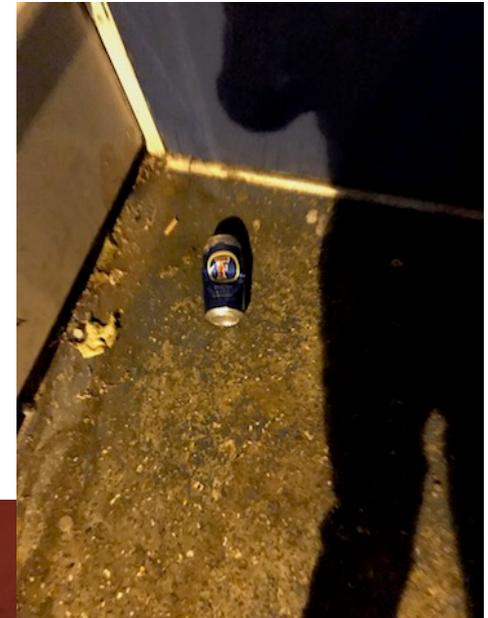


Figure 44. Often electricity / phone junction boxes and bins (whether full or not) are used to leave cans and bottles of alcohol as well as fast food cartons – both from street drinkers and from rough sleepers / beggars



Figure 45. ATMs are also a location where there is considerable littering by those in the NTE. Whilst waiting (often drunkenly) for friends to take out money they drop litter. Sometimes, beggars leave vessels of super strength lager and cider by ATMs where they beg for money



Figure 46. NTE litter nuisance on Tavistock Street. The largest amount if comes from customers of KFC, but customers of the other late-night refreshment premises are also seen to drop wrappers

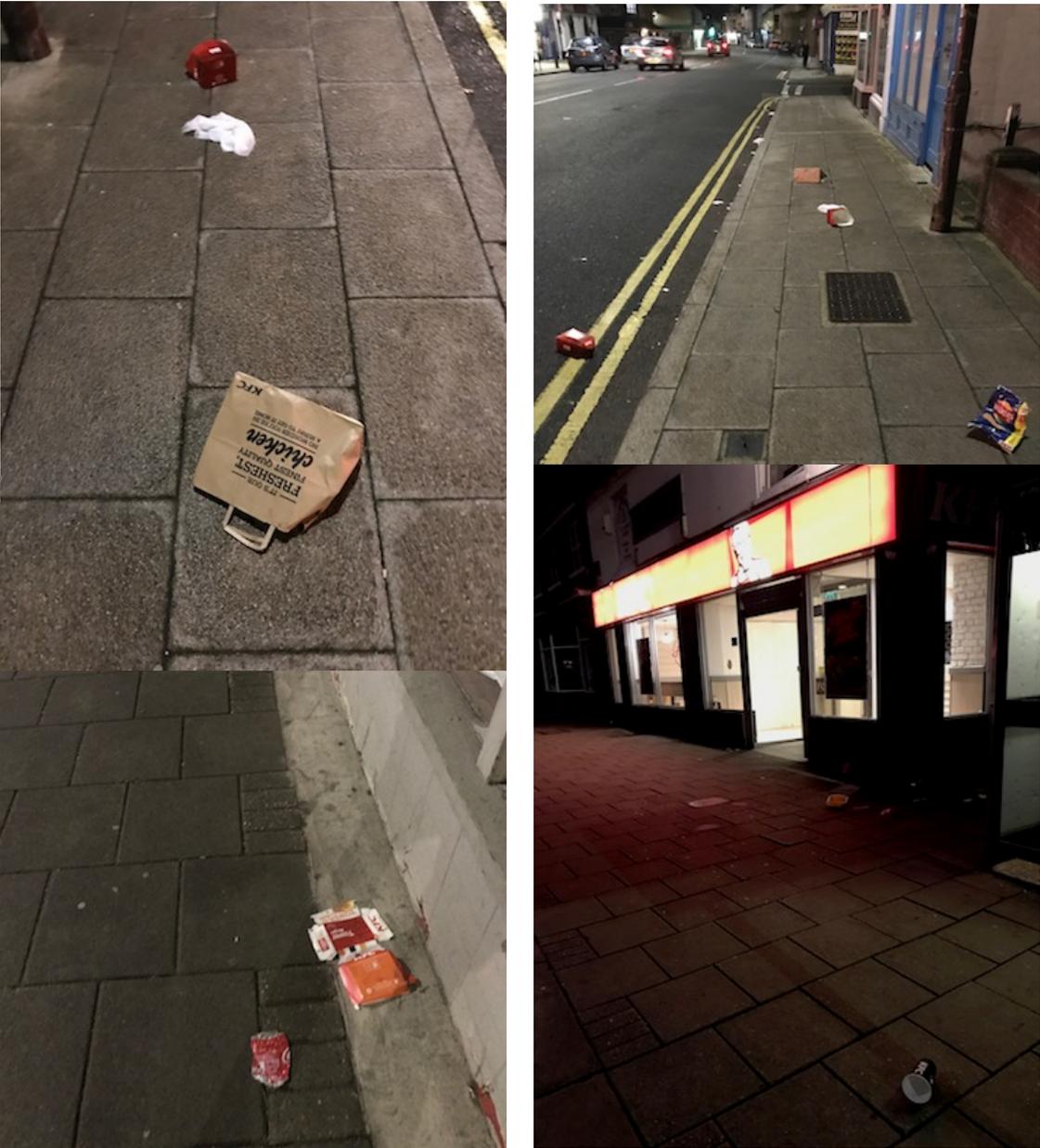


Figure 47. A glass bottle is smashed by a drunk individual using the off-licence on Tavistock Street



Figure 48. Street furniture provide hotspots for both night-time economy litter (for example St Paul's Square) and for street drinkers (opposite Tesco on the pedestrianised eastern area of Midland Road)



Figure 49. Whilst the town centre is very quiet late at night, as people walk home through it from the night-time economy in the High Street they discard considerable litter and often food itself. Also (see over) many are highly intoxicated and struggle to eat what they have purchased and drop food on the floor.





Figure 50. However, the most substantial impact of littering and food detritus is immediately outside takeaways in the High Street, particularly Mario's and Subway



Figure 51. Midland Road also suffers from night-time economy users discarding litter from the cluster of late night refreshment operators located here. They walk home alone Midland Road and despite bins some throw their packaging on the floor or drunkenly spill food



Figure 52. There are moderate amounts of street drinking litter left around the town. This comes from both pre-loaders and rough sleepers / street drinkers



Figure 53. During the observations, residents in these upper storey apartments either closed their windows when noisy users of the NTE were below them or hung out of their windows to berate inconsiderate intoxicated individuals



Figure 54. There is a serious problem with homelessness / rough sleeping in Bedford. Whilst most do not intimidate people, a small number do aggressively beg. Most rough sleepers do leave a mess around doorways where they sleep, including empty cans and bottles of strong lager / cider.



Figure 55. At night, large parts of the town centre are empty and can be intimidating for residents and visitors because it is so deserted and the only individuals in the streets are either intoxicated and often noisy or those who are rough sleeping, some of whom can aggressively beg

