



High Town Licensing Cumulative Impact Policy

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## 1. Introduction

Luton Council are reviewing the Licensing Policy in relation to 'stress areas' with the consideration of implementing the Cumulative Impact Policy. Part of the objectives for this is to prevent crime, disorder and public nuisance, as well as improving public safety. This report will outline some of the work already carried out which supports that the requirement CIP.

In March 2019 Luton Community Safety Partnership (CSPE) identified High Town as a priority for the partnership to have a primary focus of reducing the crime and ASB. High Town is a residential area, which also facilitates a number of businesses and Luton train station. The area therefore has a high footfall as well as road traffic, in and out of the Town Centre

With regards to levels of all crime, the output area of focus is 7<sup>th</sup> highest (out of 122) in Luton and there were 355 offences that were recorded in this area between 1<sup>st</sup> April 2019-31<sup>st</sup> December 2019. The only areas that were higher with regards to levels of all crime were the town centre and some other surrounding areas and the airport. High Town currently has a recorded population of 2256 (1250 males and 1006 females).

There have been longstanding reports of both crime and anti-social behaviour (ASB) in the High Town area of Luton. The most notable issue in this area is that of 'prostitution' related activity and other associated environmental issues. Evidence relating to these issues can come from a variety of sources including reports to Bedfordshire police, Luton Borough Council or other partner agencies. Anecdotal evidence also helps provide a picture of the issues.

However from residential meetings and the CSP knowledge of High Town community, reporting is significantly low in relation to not only the ASB but also the crime.

Because of this Operation Octans was set up, which was a partnership approach to identifying the issues within High Town, what is causing this and the best way to tackle them with a number of different interventions.

The first stage of the Operation was a three day door knock in the 8 streets of High Town which were identified as having the highest rate of crime and ASB. The door knock was conducted by Bedfordshire Police and Luton Council and all residents and businesses were approached, to complete a survey regarding their perceived issues of Crime and ASB in the area. This was conducted during different days and times, to maximise the amount of residents and businesses that were spoken to:

- **Monday 21<sup>st</sup> October – 1700 – 2100 hours**
- **Tuesday 22<sup>nd</sup> October – 1200 – 1600 hours**
- **Saturday 26<sup>th</sup> October – 0900 – 1300 hours**

A copy of the Order Application and Questionnaire has been embedded into this document.

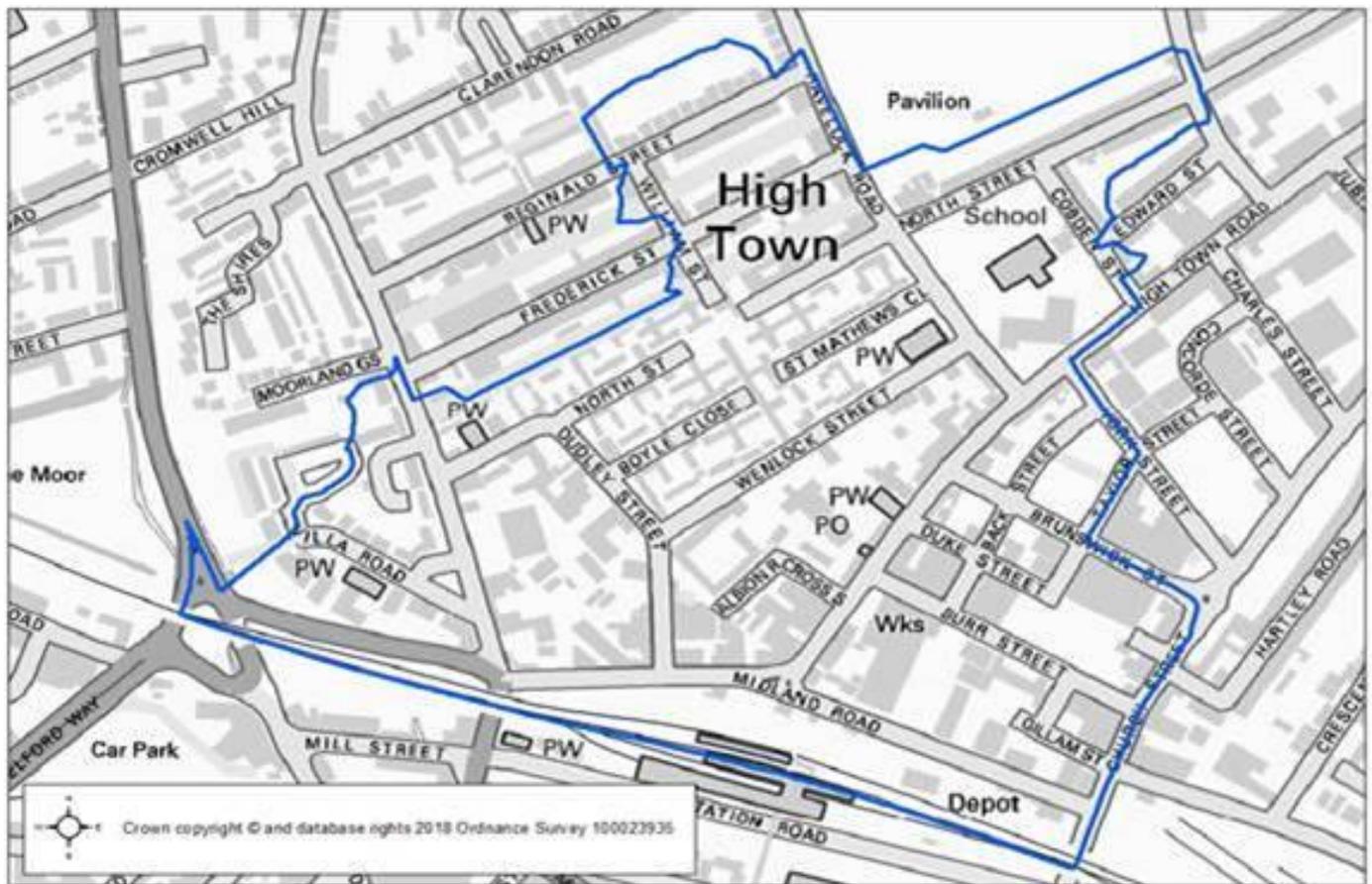


Operation Octans  
Operation Order.do



Op Octans Door  
Knock Questionnaire

## 2. Geographical area



The map above outlines the boundary for the High Town area and the 8 streets, which are included under Op Octans are:

1. High Town Road
2. Old Bedford Road (to the junc with Frederick Street)
3. Midland Road
4. Dudley Street
5. Wenlock Street
6. Havelock Road
7. Frederick Street
8. William Street.

## 3. Results of 3 day operation

189 people agreed to complete the survey, which were made up of the following:

Local resident (156) 83%  
 Business owner (23) 12%  
 Someone that works in the area (7) 4%  
 Visitor to the area (2) 1%

Friend/family member of a resident (-)

Respondents were asked **What would you say are your three main concerns, in terms of crime and anti-social behaviour within this area?**

The top three reported issues were in relation to the On-Street Sexual Exploitation (OSSE), Drug related Anti-Social Behaviour (ASB) and Environmental Crime (fly tipping and waste disposal).

Of the 189 responses, 54 reported ASB as being their main issue within High Town and from that 6 specified this being in relation to street drinking.

There were also comments specific to businesses within the area including:

- *Closed down businesses*
- *Vape station across the road*
- *New shops needed*

Residents were then asked **What suggestions would you have to help tackle these issues?**

The majority of recommendations were in relation to the following:

- Increased CCTV
- Increase in Police/Officer Presence
- Improved Street Lighting
- Additional support for Homeless and people with addictions

Again, some of the comments and suggestions were specific to the businesses within the area

- *Redevelopment of the area*
- *Better shops, lighting and enforcement needed*

#### 4. Joint Action Group

On Thursday 19<sup>th</sup> December 2019, a joint action group was held after the three days of action, to discuss the reported issues, identify the cause of these and action/initiatives that could overcome this.

The partners included (but no exclusive to):

- Public Health
- Community Policing
- Community Safety/ASB Officers
- Neighbourhood Delivery
- Parking Enforcement
- Friends of High Town
- NOAH
- Signpost
- LBC Housing
- Cllrs
- Street Services
- resoLUTiONS

- Beds Fire Service

The issues were outlined and it was commented that High Town was subject to the 'Broken Window Effect' meaning that because the area had geographical issues, this has a knock on effect, making it a hotspot for crime and ASB.

A number of improvements were recommended, and an action plan was developed. This including a review of the CCTV and lighting in the area, increased patrols and also, a review of the businesses and housing within the area.

A proposal to set up a Business Forum was put forward, to strengthen the relationship with the local businesses and the Partnership; encouraging them to report issues and provide intelligence regarding crime and ASB in the area.

Another recommendation was about improving the Business industry within High Town, providing a more vibrant, varied and appealing commercial offer to residents of High Town and Luton as a whole.

The CIP would support this as it would have an overview and influence to the business that open and operate within this area and how they can positively affect the community and prevent any further negative impacts in relation to crime and ASB.

## Overarching Approach

The CIP review would not tackle the issues of crime and disorder within the High Town in isolation; however they could complement initiatives and support services, in achieving a long term solutions to the issues.

### Safer Street Funding

An application via the Police Crime and Commissioner (PCC) has been made, for funding to assist with improving the High Town area and prevent the crime and ASB. The initiatives that have been included within this application are:

- Improved Lighting
- Additional CCTV coverage
- Set up and co-ordination of High Town BID
- Set up and co-ordination of Neighbourhood Watch in High Town
- Signage and communications projects
- PSPO/Gating Orders

### Housing Development

There is already a lot of work being done within High Town by LBC's Housing department, particularly within the Paths Estate. This is to improve the accommodation provided, by the council to some of the most vulnerable residents of Luton; making it safer and more appealing to live in.

### Dedicated Officers

Bedfordshire Police have assigned a dedicated Police Constable (PC) and Police Community Support Officer (PCSO) to the area. Who are tasked with regularly patrolling the area and engaging with the community. This is to offer assurance to the residents, increase enforcement, prevent/disrupt crime/ASB and to help build intelligence.

Luton Council's Neighbourhood Enforcement Team (NET) have also appointed a dedicated officer, which again will assist in the evidence gathering and disrupt issues, such as environmental crime.

## **Environmental Action Days**

There have already been a number of EAD's since the start of Op Octans, which have assisted with a community clear up, increased officer presence, increased community engagement and assisted with promoting and educating on supporting services.

If the CIP was implemented in the High Town area, this would further embed the joint working approach with partners, as well as further enhance the work to make it a better place to live and work.

## **Partnership Consultation of the CIP review**

### **James Hardiman – Deputy Neighbourhood Operations Manager**

*I have been employed by Luton Borough Council since January 2017, during this time I have been involved within the Neighbourhood Enforcement Team as an officer and then as a Team Leader. My role now as Deputy Neighbourhood Operations Manager, still encompasses work around the neighbourhood Enforcement Team but also sees me managing the Priority Anti-social Behaviour Team which comprises of officers from Luton Borough Council and Bedfordshire Police.*

*Since my time with Luton Borough Council, the town centre has always been a focus, specifically around street drinking and begging. In July 2018 a Public Spaces Protection Order was brought in to tackle various behaviours within the area including Street Drinking outside of a licensed premise.*

*Since the introduction of the PSPO the team has had 1319 interactions with persons found street drinking. Often these are repeat individuals who often come into the town centre to socialise with others whom are involved within this street life culture. There are four persistent areas of the town centre where persons are found street drinking and often at times this is either directly outside of licensed premises or within a very short distance from where the individual is found, therefore the town centre becomes a focal draw point due to the number of premises.*

*As part of this we are aware and have seen that those involved in street drinking often at times are perpetrators of associated Anti-social Behaviour, whether this be through verbal abuse to those within their group or others within an area, fighting, playing loud music or any other associated behaviours i.e begging.*

*We have received a number of reports alongside this from business premises that often have groups of individuals sitting outside of their premise, which then in turn affects persons coming into the location or walking past. We have also received reports from members of the public at time stating that they feel vulnerable when walking past drunk persons or groups for their own safety and that of their children. This then results in further enforcement being deployed into the area to look at combatting the problem, therefore impacting upon resourcing levels.*

*As part of the Priority Anti-social Behaviour team, the remit is to case manage victims of Anti-social Behaviour but to also look at perpetrators of ASB. The team have dealt with a number of complaints around street drinking and associated ASB along with looking at additional ancillary orders for those involved in persistent levels of ASB.*

*I am in support of the CIP as this would limit the number of licensed premises within the town centre, a number of whom do not abide by legislation around being a licensed premise. This would ultimately have an impact on the look and feel of the town centre and provide residents and visitors to the town with a safe place to go about their daily lives*

**Bill Masini – Trading Standards Officer**

*In early 2019, I was asked to tackle the irresponsible and illegal supply of strong alcohol from Licensed “convenience” shops in Luton’s Town Centre because I was told there was a serious problem with street drinking, begging and general social behaviour.*

*This was despite there being a Public Spaces Protection Order in place prohibiting such drinking. It was immediately clear to me that there was an acute problem in The Town Centre with people drinking very strong beers and ciders and begging was clear for everyone to experience. I witnessed regular “group drinking”, urination in public and vomiting during the day when other members of the public were just going about their normal day of working, leisure activities and/or shopping.*

*Initial enquiries revealed a widespread supply of these drinks with the most popular being a 9% beer from Poland, called “Karpackie”. Beers with an alcohol by volume of 7.5% or above are subject to an additional “strong beer duty” as part of HM Government’s health strategy to reduce consumption of these products. This beer in particular was being sold illegally below “The Duty Price” and was smuggled alcohol. Enquiries confirmed it was purchased in large quantities from illegal sources, predominantly from itinerant traders without any business documentation. 21 of 24 independent shops (88%) were selling this drink below or within 10 pence of the duty price indicating the product to be smuggled. One claimed it was sold as a loss leader to attract customers and thus not illegal. The cheapest price in Luton Town Centre was £1 per can that contained 4.5 units of alcohol making the price per unit of alcohol just 22 pence; incredibly cheap. Putting this in context, the minimum unit price for alcohol in Scotland and Wales is more than twice that at 50 pence per unit, meaning the duty alone on such a drink there is £2.25.*

*These drinks, being extremely strong and cheap, are particularly attractive to alcoholics and many members of the rough living “street” community and thus undermine attempts to rid themselves of their addiction. Begging, including outside those premises that sold these drinks, was widespread and undermining the PSPO and the licensing objectives.*

*Premises Licence holders knew what they were doing was illegal and had clearly “taken their chances”. Other conditions on their licences were often breached and the worst cases were “taken to review”*

*Seizures of more than 7,000 cans of Karpackie were made in the space of 3 months. In one off licence located within the Town Centre area of Luton, the stock area was completely dominated by super strength beers and ciders, containing 77 trays (1848 cans) of just Karpackie. Other similar illegal beers has included Perla Mocne (another Polish beer with an ABV of 7.6%) and so sold even cheaper than the Karpackie*

*I submitted 8 applications to review premises licences on behalf of the local authority within the Town Centre and Hightown area of Luton following my findings. This was a challenging piece of work, and is still on-going with licensed premises within the town.*

*It is my opinion that the Town Centre and Hightown is battling a huge problem in relation to street drinking and anti-social behaviour caused by the availability of super-strength beers being sold so cheaply, this is dramatically affecting the local area and the promotion of the licensing objectives, I therefore support the introduction of the Cumulative Impact Policy.*