

**NORTHAMPTON BOROUGH COUNCIL**

**Licensing Committee**

Your attendance is requested at a meeting to be held at The Jeffrey Room, St. Giles Square, Northampton, NN1 1DE. on Tuesday, 18 June 2013 at 6:00 pm.

**D Kennedy  
Chief Executive**

**AGENDA**

1. Apologies
2. Minutes
3. Deputations / Public Addresses
4. Declarations of Interest
5. Matters of Urgency which by reason of special circumstances the chair is of the opinion should be considered
6. Proposal for an Early Morning Restriction Order  
(Report of Chief Executive – Copy herewith)
7. Exclusion of Public and Press

The Chair to Move:

“that the public and press be excluded from the remainder of the meeting on the grounds that there is likely to be disclosure to them of such categories of exempt information as defined by section 100(1) of the Local Government Act 1972 as listed against such items of business by reference to the appropriate paragraph of Schedule 12a to such act.”

**Public Participation**

Members of the public may address the Committee on any non-procedural matter listed on this agenda. Addresses shall not last longer than three minutes. Committee members may then ask questions of the speaker. No prior notice is required prior to the commencement of the meeting of a request to address the Committee.

**LICENSING COMMITTEE**

**Tuesday, 30 April 2013**

**PRESENT:** Councillor Malpas (Chair); Councillor Hill (Deputy Chair); Councillors Beardsworth, Ford, Patel, Sargeant, Strachan and Wire DL.

**1. APOLOGIES**

Apologies for absence were received from Councillors Capstick, Duncan and Eales.

**2. MINUTES**

- (1) The confidential (Part 2) minutes of the meeting held on 11 February 2013, which had been deferred at the previous meeting (held on 19 March 2013) to ensure that all Members had received them, were confirmed and signed by the Chair as a true record.
- (2) The minutes of the meeting held on 19 March 2013 were confirmed and signed by the Chair as a true record.

**3. DEPUTATIONS / PUBLIC ADDRESSES**

Mr Pasquale Renda, Mr Ian Page, Mr Paul Bruere, Mr Trevor Brown and Mr Ashraf Hussain were granted leave to address the Committee in respect of item 6: Safety Awareness Course. Mr Aldo Gallone was granted leave to address the Committee in respect of item 7: Street Trading Fees and Consents.

**4. DECLARATIONS OF INTEREST**

There were none.

**5. MATTERS OF URGENCY WHICH BY REASON OF SPECIAL CIRCUMSTANCES THE CHAIR IS OF THE OPINION SHOULD BE CONSIDERED**

There were none.

**6. SAFETY AWARENESS COURSE**

A Senior Licensing Officer presented a report on the proposed introduction of the Safety Awareness Course for drivers who had been acting illegally. The report had been deferred at the last meeting of the Committee, held on 19 March 2013, to seek the views of the trade and to give the trade the opportunity to present their views to the Committee.

Mr Pasquale Renda, having been given leave, addressed the Committee to commend the course, which he considered to be excellent. He asked that the course be extended for a further 6 or 12 months and that the resulting information from the course could then be reported to the Committee. He stated that he had a friend who was a Private Hire driver who had been "flagging" and who had received a £1,000 fine and 6 points on his licence. He was aware that his friend had contemplated suicide. Mr Renda stated that the course would provide a breathing space for any drivers caught acting in this way, whilst maintaining the Council's duty of keeping the public safe. He also referred to the high regard drivers and operators had for the Licensing officers.

Mr Ian Page, having been given leave, addressed the Committee, and gave a personal insight into the course. He had, in a moment of weakness and under financial pressure as

costs escalated, picked up two people who had “flagged” him down and been caught. He had been devastated, having always taken pride in his work and also at the thought of receiving 8 points on his licence and possibly losing his driver’s licence. He had been relieved to go on the course as an alternative to prosecution. He stated that many drivers would benefit from the same alternative. He recommended the Committee to agree to the continuation of the course. Mr Page also spoke of the excellent service provided by the Licensing Department and the good working relationship with the trade.

In answer to a question, Mr Page considered that drivers committing speeding offences should also have the opportunity of going on the course.

Mr Paul Bruere, having been given leave, addressed the Committee, and spoke to notes on “Prohibiting ‘Flagging’” which he had placed around the table before the start of the meeting. He stated that the Local Government (Miscellaneous Provisions) Act 1976 required the offence of “flagging” to be prohibited and that the proposal would not do so and would create a two tier system. He stated that prosecutions had not provided a deterrent to “flagging” as out of 72 prosecutions to September 2012 only 2 Private Hire badges had been permanently revoked. The Council’s Solicitor stated that if the Magistrates Court imposed a disqualification period on a driver’s DVLA licence then the driver would not be able to drive and subsequently his Private Hire Driver’s licence would have to be surrendered. With reference to Mr Bruere’s comments about prosecutions and revocations, the Chair referred to a recent incident where the Director of Public Prosecutions had decided that it was not in the public interest to prosecute a Hackney Carriage driver caught without a licence and as a result had no insurance. Mr Bruere was asked if the driver should be treated any differently to a Private Hire driver caught “flagging” and Mr Bruere stated that he should. Mr Bruere was also asked if he thought a Hackney Carriage driver caught driving without a licence and as a result had no insurance should always be prosecuted and he said no.

Mr Bruere referred to his proposals to deter “flagging”, as set out in his paper and stated that the safety awareness course should be taught to all drivers when badges were issued and that safety was emphasised in the Private Hire Drivers Handbook.

In answer to questions, Mr Bruere stated that Private Hire drivers were blocking the taxi ranks, were “flagging” when they knew it was an offence, and that Hackney Carriage drivers were committing an offence if they did not have insurance. He stated that these issues were not mistakes but were instances of drivers acting illegally.

The Chair asked anyone submitting a paper to the Committee to do so at least the day before the meeting, not at the meeting itself, in order that the paper could be read and researched by Members before the meeting took place.

Mr Trevor Brown, having been given leave, addressed the Committee, and spoke of the town centre taxi ranks being blocked by Private Hire drivers so that when taxis had passengers they could not leave the ranks, of Private Hire drivers “flagging”, and of receiving abuse from Private Hire drivers.

These were particular problems at weekends, between 2.00am and 4.40am. He invited Committee members to join him at these times to see the situation for themselves. He stated that the Police took no action in these circumstances and often moved taxis on if they could not get on to the ranks.

In answer to a question Mr Brown considered that the Safety Awareness Course should be open to both Private Hire and Hackney Carriage drivers who had acted illegally.

Mr Ashraf Hussain, having been given leave, addressed the Committee, and stated that

much of what he had wanted to say had already been said. He stated that the situation with “flagging” was getting out of hand, particularly at weekends, and that the proposed course would make the situation worse. Currently, drivers “flagging” could get points and might get banned. Under the proposal, drivers flagging would not be banned after the first offence and would be more relaxed and comfortable about “flagging” rather than fearful of prosecution. Mr Hussain stated that he had been caught “flagging”, been banned and received six points on his licence. He considered that prosecution was a deterrent to drivers in respect of “flagging.”

In answer to questions Mr Hussain stated that between being reported and appearing in court for his offence he had been able to keep driving, also that under the proposal drivers would have to pay £200 to attend the Safety Awareness Course but would keep their Private Hire licences.

In answer to Members’ questions and issues raised by the speakers the Senior Licensing Officer stated that there had been a progression in the action taken by officers to address the problem of “flagging.” Initially, warnings had been given, followed by cautions. Prosecutions had then been introduced but, as some of the public speakers had said, had not proved effective in stopping flagging . The fact that it could take 12 months or longer to conclude a case could present an issue as during that time the driver was still able to drive. It was considered that an approach that included an element of education might have improved results. There had been a good response to date to the Safety Awareness Course and there had been no repeat offenders to date.

Members expressed concerns about the issues raised by the public speakers in respect of Private Hire drivers and the establishment of a working party was suggested to look into the issues. Whilst not doubting the comments they had heard some Members indicated a desire that information on the issues be collected and a Member suggested the possibility of a site visit at the times mentioned by a public speaker to ascertain the nature of the problem. The Council’s Solicitor stated that the Committee should not take a decision on an issue and afterwards investigate whether or not there actually was an issue. He stated that the issue should be investigated and then a course of action be considered.

The Head of Public Protection stated that resources had been increased in the Licensing area and would be deployed to investigate the issues raised by the speakers in respect of Private Hire drivers. He confirmed any repeat offenders would be taken to court, or individuals taken straight to court if that was felt to be a more appropriate action than attendance on the Safety Awareness Course.

Members considered that, although not part of the Safety Awareness Course, the issues raised by the speakers should be looked into and agreed to establish a working party consisting of Members and supported by a Licensing officer. This investigation would result in a report to a future meeting of the Committee.

The Council’s Solicitor advised that the Committee needed to consider whether or not the Safety Awareness Course should be introduced and, if so, indicate the reason(s) for so doing.

Members considered that in view of the information given earlier by the Senior Licensing Officer, and supported by the comments of some of the public speakers, that the current system of prosecutions could take 12 months or longer to conclude a case and prosecutions were not considered to be proving effective, the Safety Awareness Course should be introduced as a swifter way of maintaining public safety and reinforcing the concept of public safety to the drivers, and that the course be extended to Hackney Carriage drivers as well as Private Hire drivers.



## **RESOLVED:**

- (1) That the Safety Awareness Course be introduced as an addition to the introduction of a phased process of discipline/punishment for Private Hire Drivers and Hackney Carriage drivers who breached conditions and legislation in relation to plying for hire.
- (2) That reasonable powers be delegated to the Licensing Enforcement Officers to use their discretion as to when and under what circumstances the alternative action be taken.
- (3) That a working party, supported by a Licensing officer, be established to investigate issues raised by the public speakers above in respect of Private Hire drivers, with a membership of Councillors Beardsworth, Malpas, Patel and Wire DL.

## **7. STREET TRADING FEES AND CONSENTS**

A Senior Licensing Officer stated that the Committee had received the results of the consultation regarding the proposed increase in street trading fees and amendments to the Street Trading locations at its meeting on 11 February 2013. The Committee had agreed to undertake the consultation at its meeting on 11 December 2012. At the 11 February 2013 meeting the Committee had asked the officers to re-consider the proposed increases and to present a revised report indicating a more phased increase. All street traders had been notified about the proposed increases and a statutory notice had been placed in the local press and two objections to the proposed increases had been received, from Aldo Gallone and from Keith Hills.

Further analysis was being undertaken by the officers to determine suitable locations and periods of trading for Street Trading pitches in the town centre and a report on this issue would be presented to the Committee once the analysis had been completed.

Mr Gallone, having been given leave, addressed the Committee. He stated that he objected to the proposed increases and would like his site to be considered in line with increases to other sites and based on the Retail Price Index. This would make transparent any future increases and could be reviewed every 5 years. He stated that he paid £700 for his pitch now and that this would rise to £2,000+ over 5 years. He was concerned that any future changes to the Council's Administration might result in further high increases. He also stated that he paid business rates but the café in the park did not. Mr Gallone also wished to object at being moved from the traditional spot he had occupied outside Abington Park for over 80 years, which had affected his trade, and would prefer to stay in his location and have a pitch marked out on the highway.

In answer to questions Mr Gallone stated that he had no objection to paying an increase but wanted a level playing field for all street traders. He also supported a 5 year rent review. He would be happy to take the 2003 fees, which had not been increased since that time, and increase retrospectively by the Recommended Price Index. He accepted that there had not been an increase in his fees in 10 years

The Head of Public Protection stated that fees were reviewed annually and Street Trading fees had not been increased since they were introduced in 2003. The Council was now seeking to bring them up to a realistic level over a 5 year period. The Senior Licensing Officer stated that activities such as Mr Gallone's, which were outside the Park, were counted as licensable activities and that those in the Park were managed by leases under the Asset Management functions which were put out to tender. The fees had to be calculated in differing ways and governed by different legislation. In relation to Street

Trading fees, the Council is directed to calculate fees only to cover the cost of running the service in respect of licensable activities. Currently, this part of the service was running at a loss.

In respect of Mr Gallone's pitch, it was noted that there was currently some limited scope in respect of other pitches which might be available for his operation, should he wish to consider this. The Senior Licensing Officer outlined that any proposal to designate a new street trading pitch would go through the statutory consultation and be presented to the Licensing Committee accordingly.

In respect of any future review of fees it was noted that this Council could not lawfully fetter the discretion of any future Council.

**RESOLVED:**

That after due consideration of the two objections detailed in Appendix D to the report, the following be approved:

- (1) The three tier structure of the Street Trading fees, to include Standard, premium and Town centre categories, in accordance with paragraphs 3.1.16 to 3.1.18 of the report;
- (2) The proposed increases in Street Trading fees, in accordance with paragraph 3.1.19 of the report.

The meeting concluded at 7:12 pm



**NORTHAMPTON**  
BOROUGH COUNCIL

## LICENSING COMMITTEE REPORT

<b>Report Title</b>	<b>PROPOSAL FOR AN EARLY MORNING RESTRICTION ORDER</b>
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**AGENDA STATUS: PUBLIC**

<b>Committee Meeting Date:</b>	<b>18<sup>th</sup> June 2013</b>
<b>Policy Document:</b>	<b>Early Morning Restriction Orders</b>
<b>Directorate:</b>	<b>Customers and Communities</b>

### 1. Purpose

For the Licensing Committee to consider this report and supporting evidence in order that consideration be given to introduce an Early Morning Restriction Order (EMRO) under the Police Reform and Social Responsibility Act 2011.

### 2. Recommendations

2.1 Having considered the evidence and all options, it is recommended that members resolve to agree that sufficient evidence exists with two or more premises and for the promotion of the licensing objectives namely,

- the prevention of crime and disorder
- public safety
- the prevention of public nuisance
- the protection of children from harm

to advertise the proposal to introduce an EMRO and therefore to commence a consultation period of no less than 42 days, in accordance with section 172B(1)(a) of the Licensing Act 2003 and the Licensing Act 2003 (Early Morning Alcohol Restriction Orders) Regulations 2012, the EMRO detailed in 3.3 option D, as follows:-

- D** An EMRO commencing on the 18<sup>th</sup> November 2013, to prohibit the sale of alcohol between the hours of 03:00am and 06:00am, Monday to

Sunday, for an indefinite period, in respect of the Leisure zone area designated on the plan in **Appendix 1**  
(Leisure zone being an area with a high concentration of licensed premises)

- 2.2 To consider any representations arising from the advertising of the proposed order in accordance with the timetable referred to in paragraph 3.4 and within the context of promoting the licensing objectives.

### **3. Issues and Choices**

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#### **3.1 Report Background**

- 3.1.1 On the 11 February 2013 the Licensing Committee agreed that Northampton Borough Council should not pursue consideration of the imposition of a Late Night Levy, but that it should conduct a more detailed analysis in respect of introducing an early morning alcohol restriction order in Northampton.
- 3.1.2 Since the implementation of the Licensing Act 2003 on the 23<sup>rd</sup> November 2005, governments have recognised that alcohol related crime and disorder has increased. The coalition government considered that this increase was in part due to the proliferation of extended operation into the late night and early morning hours. It responded to these concerns with a range of measures contained in the Police Reform and Social Responsibility Act 2011. The Police Reform and Social Responsibility Act 2011 (PRSRA) gave licensing authorities the power to make an early morning alcohol restriction order (EMRO).
- 3.1.3 EMRO's are designed to address recurring problems such as high levels of alcohol-related crime and disorder in specific areas at specific times during the late night and early morning hours; serious public nuisance; and other instances of alcohol-related anti-social behaviour which are not directly attributable to specific premises.
- 3.1.4 An EMRO is a power which has been introduced by the (PRSRA) enabling licensing authorities to restrict the sale of alcohol where they consider that there are alcohol related crime and disorder, public nuisance, protection of children from harm, public nuisance issues in the whole or a part of their area between 12 midnight and 06.00am on all or some days.
- 3.1.5 The Home Office have made it clear in its consultations and publications that the purpose of the PRSRA is the rebalancing of the Licensing Act 2003 in favour of local communities and regulatory authorities. An EMRO is one of a range of tools which can be used to rebalance the licensing regime. As with other functions of a licensing authority this is to be exercised for the promotion of the licensing objectives.

## Late Night Drinking in Northampton

- 3.1.6 The Licensing Act 2003 (LA03) came into force at midnight on the 23<sup>rd</sup> November 2005 and established a single integrated scheme for licensing premises used for the sale or supply of alcohol, regulated entertainment and late night refreshment. The new system replaced the requirement to apply for several different licences under different schemes and created one unified authorisation regime, with the flexibility to apply for a 24 hour licence tailored to the requirement of each premise. The new Act also made provision for individuals to apply to the local authority for a one off Temporary Event Notice (TEN) in order to obtain the necessary permissions on unlicensed premises, or as an extension to the existing hours for those already holding a licence.
- 3.1.7 Previously in accordance with the Licensing Act 1964, magistrates granted standard hours until 11pm for the sale of alcohol, with additional hours being granted under special certificates, or for those premises who applied for a public entertainment licence, with the latest terminal hour for the sale of alcohol in Northampton being granted until 03:00 am.
- 3.1.8 Magistrates and local authority records indicate that in 2004 Northampton had 70 premises granted public entertainment licences, or special certificates for extended hours past midnight. In comparison and since the introduction of the LA03, Northampton currently has 183 licences granted for the sale of alcohol after midnight, with 35 selling alcohol beyond 03:00am.
- 3.1.9 A detailed breakdown of the number of licences that existed in 2004 and comparable data as at January 2013, shown by type, and the latest hour granted for the sale of alcohol is detailed in **Appendix 2**
- 3.1.10 During the transitional period in 2005, applicants had the opportunity to apply to the local authority to simply convert their existing licence, or apply to convert and extend their hours. At this time a small number of premises applied to extend their existing hours for the sale of alcohol.
- 3.1.11 Since the transitional period to take advantage of the new flexible hours, NBC has received and granted over 100 applications, permitting hours for the sale of alcohol past midnight. There has been an increase of 150% in the number of premises now selling alcohol beyond midnight; this in turn has created a domino effect whereby premises are now applying to extend their hours in order to compete with other premises. It is well documented and generally recognised that the late night economy on both a national and local level now starts and ends later. Evidence of this continuing need and gradual shift for later hours, for the sale of alcohol is detailed in **Appendix 2**
- 3.1.12 The data analysed has been calculated using the end of permitted hours for the sale of alcohol, on the day of the week with the latest permitted hour for each premises, and not the closing time of the premises.
- 3.1.13 In addition to those applying to increase their licence into the early hours on a permanent basis, evidence from data extracted has shown that in recent years there has been an increase in the number of days where Temporary Event Notices (TEN) permissions have been granted for the sale of alcohol, with a peak in the number of days between 02:01am – 03:00am and 04:01am

– 05:00am in 2012. A sample of the data in 2012 between these times, shows that a high percentage of those days granted are within the area of the leisure zone. Evidence of this is detailed in **Appendix 2**

- 3.1.14 As a result of these changes in legislation and increasing numbers of premises staying open later, the night time economy in Northampton now starts and ends later and with an increase in alcohol-related crime and disorder during the early hours of the morning.
- 3.1.15 Northampton Borough Council, Northamptonshire Police and other relevant partners, have produced evidence showing the impact that late night drinking is having within Northampton. This evidence shows that there is an increase in alcohol related crime and disorder into the early hours of the morning, with a higher, disproportionate problem within the leisure zone. Evidence of this increase is shown in **Appendix 3**
- 3.1.16 Crime and disorder also has a significant cost implication for the Northampton economy. In September 2012, Northamptonshire County Council published a report detailing the cost of Alcohol to the Northamptonshire Economy. Pages 13 and 14 of the report show the costs of alcohol misuse appropriated to the Northampton area. Evidence of this report is attached in **Appendix 4**
- 3.1.17 To tackle these problems, all partnership agencies in Northampton have and continue to work proactively using tools available to assist with the promotion of all of the licensing objectives (not just crime and disorder), for example these include;
- Setting up a Community Safety Partnership
  - The adoption in 2009 of a Designated Public Places Order and using directions to leave under section 27 of the Violent Crime Reduction Act 2006.
  - Actively participating within the local Pubwatch scheme.
  - Establishing and maintaining a Best Bar None awards scheme.
  - Taxi Marshalls
  - Street Pastors
  - Dedicated police licensing officers.
  - Closure Notices
  - Road Closures
  - Nightsafe
- 3.1.18 It is of note that significant work has been undertaken by the partnership agencies and the licensees to develop a Best Bar None scheme. However there has seen a drop in applications from 38 in 2012, to 23 in 2013.
- 3.1.19 Under the current legislation, the hours of trade permitted by the licence can only be amended by either a variation, or by order of a licensing sub-committee following a review of the licence. Northamptonshire Police has used this tool to bring about the review of premises and will continue to take this course of action where there has been evidence of crime and disorder clearly linked to particular premises. Since the implementation of the LA03, Northamptonshire Police have applied for 28 reviews of licences within the

Northampton area under the licensing objective of the prevention of crime and disorder.

- 3.1.20 Northamptonshire Police have also worked with a number of premises to voluntarily restrict the hour for the last entry of customers, in an effort to minimise the movement of people from one premises to another. Whilst it has been recognised that licensees have cooperated fully, it is very difficult for the police to evidence **ALL** incidents of crime and disorder to any particular premises and call for a review, in order to bring about a reduction in the permitted hours.
- 3.1.21 In 2009 Northampton Borough Council successfully applied for and received authorisation to implement a Designated Public Places order for the whole of the Borough. This allows police officers to confiscate alcohol in public places if deemed there is potential for anti-social behaviour or disorder.
- 3.1.22 Having used these tools, the local authority having consulted with the Community Safety Partnership is now of the view that it is appropriate for an EMRO to be considered and for consultation to be commenced in accordance with The Licensing Act 2003 (Early Morning Alcohol Restriction Orders) Regulations 2012.
- 3.1.23 Northampton has not adopted a cumulative impact policy, which is dealt with under the s.182 Guidance and is not specifically mentioned in the Licensing Act 2003. This type of policy allows a local authority the opportunity to make a presumption against any new/variation of premises licence applications, on the basis that the applicant would be unable to promote the licensing objectives, unless they could demonstrate otherwise. This type of policy is not designed to redress retrospectively those premises already operating.
- 3.1.24 In arriving at the proposal officers have considered the location and the timing of an EMRO and the following are key findings to support this proposal.

#### **Is an EMRO appropriate?**

- 3.1.25 Violence is reducing at a slower rate than all crime and accounts for a higher proportion of all crime in recent years than it did in 2004/5. All agency data relating to crime and disorder shows a peak at weekends 00.00-04.49 with some data showing peaks extending to 05.59.
- 3.1.26 Anti-Social Behaviour is increasing on the Leisure Zone in general, and nearly a fifth takes place during the night time economy period with levels remaining high until 04.59 at weekends.
- 3.1.27 CCTV incidents show a peak until 04.59 at weekends in line with the peaks seen in crime, violence, incidents, East Midlands Ambulance Service and A&E data.

#### **The Location of an EMRO**

- 3.1.28 The leisure zone area, and the night time economy period specifically account for a disproportionate amount of crime within Northampton Borough. Crime in the leisure zone has fallen at a slower rate when compared with the rest of Northampton.

- 3.1.29 Where alcohol has been identified as a factor for the offender, the majority are violence against the person, and a large proportion occurs within the Leisure Zone and night time economy period.
- 3.1.30 Within the leisure zone, there is a clear correlation between the location of licensed premises selling alcohol at a specific time of night and assaults recorded by police and ambulance services at that time. This correlation is not evident across the rest of the borough so crimes cannot be attributed to alcohol licensing for the whole borough.
- 3.1.31 There is a concentration of violence after 02.00 within a specific area of the leisure zone, in close proximity to open licensed premises, and a disproportionate amount of violence 03.00-05.59 in the same area.
- 3.1.32 Data from health partners directly relating to assaults correspond with police recorded crime. Showing significantly more incidents between 00:00 – 04:59 on weekend nights in the leisure zone than any other time of the week. The peak is outside of the leisure zone tends to be earlier than this, with volume reducing around 02:59 - 03:59.

#### **What time is appropriate?**

- 3.1.33 Violent crime in Northampton peaks between 01:00 – 03:00, although the peak has extended later into the night since 2004-05.
- 3.1.34 Crime occurring on the leisure zone between 03.00-05.59 Saturday and Sunday mornings is increasing in volume and disproportionately. There is an increased risk that the public are subject to more crime and disorder during this time than they have in the past, thus undermining the promotion of the prevention of crime and disorder.
- 3.1.35 Violence on the leisure zone between 03.00-05.59 has increased by 107% between 2004/5 and 2012/13. There has been a 26% increase in violence between 02:00 – 05:59 in the leisure zone when comparing the same periods.
- 3.1.36 The increase in violent crime between 03:00 – 06:00 on Saturday and Sundays only is 91%, this is slightly less than the overall week.
- 3.1.37 Incident volumes occurring during 03.00-05.59 have not changed notably over the last 3 years despite a fall in those occurring during the wider NTE period.
- 3.1.38 When comparing 2004-5 and 2012-13, every day of the week has had an increase in violent crime in the leisure zone between 03:00 – 06:00, excluding Thursdays, which had one fewer crime.
- 3.1.39 Data from health partners directly relating to assaults correspond with police recorded crime and shows significantly more incidents between 00:00 – 04:59 on weekend nights in the leisure zone than any other time of the week. The peak outside of the leisure zone tends to be earlier than this, with volume reducing around 02:59 - 03:59.
- 3.1.40 Given the high concentration of crime and incidents within the Leisure Zone, the fact that crime and incident patterns and trends have not mirrored what has happened elsewhere on Northampton Borough, and that the NTE period, specifically incidents of crime and disorder after 03.00 is growing, it is



important for all agencies to target this area and time period to ensure the licensing objectives are met.

### **Impact of Proposal**

- 3.1.41 If adopted this restriction will apply to all premises licences; club premises certificates and temporary event notices operating past 03:00am within the leisure zone area detailed within the proposals, and will apply every day Monday to Sunday throughout the year, for an indefinite period, with the exception of the early hours on New Year's Day.
- 3.1.42 All types of premises that sell alcohol will be affected by these proposals, except for hotels that provide alcohol to residents through minibars and room service. Hotels who serve alcohol in a bar, lounge or lobby will be affected by this EMRO.
- 3.1.43 Northampton has 35 premises which operate past 3:00am, of those premises 25 will be affected by the area recommended in the EMRO proposal, this includes a mixture of pubs, clubs, bars, casinos, restaurants and supermarkets. A map and details of those premises affected is shown at **Appendix 5**
- 3.1.44 To consider the impact of dispersal, it is worth noting the dispersal times of premises in 2004 and the current licensing permissions. In 2004, premises by law had what was commonly known as a "drinking up time", being 20 minutes in addition to the last sale of alcohol (30 minutes being allowed for restaurants). Under the current legislation and with the flexibility of the 24 hour licence, the "drinking up time" is now determined by the discretion of the individual making the application for a premises licence or club premises certificate or the licensing sub-committee.
- 3.1.45 The closing times of premises under the current legislation has been analysed further and data indicates that approximately 50% of those premises selling alcohol between midnight and 06:00am have a 30 minute drinking up time, with approximately 25% having a 60 minute period and 25% having no drinking up time. These percentages are similar throughout the night time economy, including the leisure zone.
- 3.1.46 As other licensable activities, including for example regulated entertainment and late night refreshment (sale and supply of hot food), will not be affected by this EMRO, premises will be able to continue past 03:00 am, in accordance with their existing closing times.
- 3.1.47 In considering the impact of dispersal, it has been encouraged by both regulation and good practice schemes that licensees take responsibility for allowing a "drinking up", or "winding down" period and it is envisaged that licensees will continue with this good practice and use their existing permissions to carry on with the licensable activities that will not be affected by the proposed EMRO.
- 3.1.48 In addition Northampton has 27 takeaways which are currently licensed for late night refreshment later than 03:00am, 21 of which are located within the recommended proposed EMRO leisure zone area, and who will not be

affected by these proposals and will be able to continue to operate in accordance with their existing permissions.

### **3.2 Feasibility Study of adopting and implementing an EMRO** **- Informal Consultation**

3.2.1 The aim of this informal consultation was to find out people's views on the potential introduction of an EMRO, as requested at Licensing Committee on 11 February and in accordance with guidelines detailed in s.182 of the Licensing Act 2003 paragraphs 16.7, 13.23 -13.24.

3.2.2 Key stakeholders, including residents, businesses, licensees, relevant businesses and services and any other interested party were invited to provide initial views on the possibility of an EMRO(s) being introduced in Northampton to help tackle problems associated with drinking.

3.2.3 The informal consultation started 28 February 2013 and ran for 5 weeks, closing on 5 April 2013.

3.2.4 People were able to engage in a range of ways:

- Licensing Committee 11 February 2013-Open to the public
- Address and e-mail address given for comments/views etc.
- Engagement with our key stakeholders and partners

This activity was advertised through the Council's website, direct letters to key stakeholders, news releases to the local media and social media, including twitter alerts and reminders.

3.2.5 Views were also sought from responsible authorities and their feedback (including data) is not included in this part of this study.

3.2.6 Over 1000 letters were sent out to key stakeholders.

3.2.7 A total of 56 residents visited our dedicated webpages during the informal consultation.

3.2.8 A list of all parties contacted and those who responded can be found at **Appendix 6**

#### **3.2.9 Results**

3.2.10 A total of 43 written responses were received. Copies of communications received are available in **Appendix 7**

3.2.11 It should be noted that additional activity relating to EMROs was undertaken independently of this exercise during the period of informal consultation and that the views expressed during such events are not included in this report.

#### **3.2.12 Findings**

Out of the 43 comments and representations received, 22 were in favour of an EMRO (although 5 of those felt that if an EMRO was introduced, it would be

more appropriate after 2am or 3am in the morning); 19 were against an EMRO at any time and 2 neither for nor against.

**A key summary of the issues raised by those objecting to the introduction of EMRO:-**

- **Displacement-** "it is likely that drinkers would start drinking in other towns"; encourage house parties/illegal parties/raves/street drinkers
- **Burden on Licensees-**Unfair to licensed premises who operate safe, secure and well managed premises; financial impact on licensees; a blunt instrument; "A balance must be sought to ensure that only those implicated in contributing to the problem are the recipients of restrictions in the trade"; businesses trapped into long leases; unfair competition; potential job losses
- **Policing/Enforcement-**Surge in customers/flashpoints
- **Impact on Northampton-** businesses will close; damage town economy; premises will close; difficult to attract new business tenants; discourage investment in town; increase anti-social behaviour; job losses; loss of business rates revenue ; discourage students coming to Northampton University; reduce town centre spending; loss of revenue in the town ; restrict special occasions, i.e. sporting events

**A key summary of the issues raised by those supporting the introduction of EMRO:-**

- **Discourage pre-loading** ; drinkers will come into town earlier
- **Police resourcing-** Allow police resources to be targeted more effectively
- **Level playing field for bars and clubs**
- **Promote licensing objectives** –Crime and disorder; Reduce public nuisance ; noise impact and better quality of life for residents
- **Reduce resources on ambulance and health service**

### **3.3 Options**

#### 3.3.1

- A. Do nothing
- B. An EMRO to prohibit the sale of alcohol for an indefinite period between; the hours of 03:00 am to 06:00 am Monday to Sunday in respect of the whole licensing authority area.
- C. An EMRO to prohibit the sale of alcohol for an indefinite period between; the hours of 02:00am and 06:00 am Monday to Sunday in respect of the whole of the licensing authority area.
- D. An EMRO to prohibit the sale of alcohol for an indefinite period between; the hours of 3:00am and 06:00am, Monday to Sunday, in respect of the leisure zone area designated on the plan in **Appendix 1**

- E. An EMRO to prohibit the sale of alcohol for an indefinite period between; the hours of 2:00am and 06:00am, Monday to Sunday in respect of the leisure zone area designated on the plan in **Appendix 1**

3.3.2 The committee have the option to;

- Decide that the recommended proposal D detailed above is appropriate for the promotion of the licensing objectives and commence consultation on the proposal;
- Decide that the proposals detailed above are not appropriate and that the process should be ended; or
- Decide that the proposal should be modified. In this case the process must begin again, based on any modified terms.

**3.4 Timetable if Committee decide to proceed**

18 <sup>th</sup> June 2013	Licensing Committee consider EMRO proposal for consultation and if agreed;
Local Authority will advertise the proposal on the 27 <sup>th</sup> June 2013 by:	Publishing a notice on its website Publish at least one advert in a local newspaper Displaying a notice in the proposed area Notify all affected persons
28 <sup>th</sup> June 2013	42 day consultation begins
Representations:	A responsible authority or any person wishes to make representation may do so; starting on the day after the day the proposal is advertised.  Representations must be made in writing and on the prescribed form.
9 <sup>th</sup> August 2013	Consultation ends
Hearing no later than the 20 <sup>th</sup> September 2013	If relevant representations are received, a hearing will be held within 30 working days, beginning with the day after the end of the consultation to consider all representations and if agreed
Determination by Licensing Committee no later than 4 <sup>th</sup> October 2013	A determination will be resolved within 10 working days of the conclusion of the hearing
14 <sup>th</sup> October 2013	Report to Special Full Council
Publication of Order:	A notice of an EMRO order if agreed at Full Council, will be sent within 7 days to all affected persons and a notice will be published on its website

	and placed within the affected area for a period of no less than 28 days
18 <sup>th</sup> November 2013	EMRO commences

- 3.4.1 NBC is required to advertise these proposals on its website and in its local newspaper as well as notifying those licence holders within the proposed EMRO area. Any person wishing to make representations for, or against, these proposals will have 42 days in which to lodge their comments. A timetable of the expected consultation period is given at 3.4.
- 3.4.2 If representations are received during the consultation period then a hearing will be held and further consideration will be given to those representations/objections before the outcome of these EMRO proposals are decided. If amendments to the proposals are considered necessary, the process for adopting an EMRO will start again.
- 3.4.3 Full Council would need to approve and decide on a start date for the Order.

#### **4. Implications (including financial implications)**

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##### **4.1 Policy**

- 4.1.2 The Council's Statement of Licensing Policy will be given a full review and updated to reflect the relevant changes to legislation.

##### **4.2 Resources and Risk**

- 4.2.1 Costs associated with advertising, consultation and administration of the EMRO will be met from the Licensing Departments budget.
- 4.2.2 There is always a risk in any process of this nature that the process and decisions of Council could be subject to legal challenge or review. Officers will carefully manage the process to seek to minimise this risk.

##### **4.3 Legal**

- 4.3.1 The framework for EMRO's is set out in Sections 172A to 172E of The Licensing Act 2003. These sections enable a licensing authority to make an EMRO in its area if it considers that this is appropriate for the promotion of the licensing objectives. An EMRO has the effect of prohibiting the supply of alcohol under the 2003 Act, subject to prescribed exceptions. An EMRO may apply for any period beginning at or after midnight and ending at or before 6 am, on all or some days, for different periods on different days, for a limited or unlimited period and in relation to the whole or any part of the licensing authority's area.
- 4.3.2 Committee members should note that the amended guidance issued under S182 of the Licensing Act 2003 states that licensing authorities are best placed to determine what actions are appropriate for the promotion of the licensing objectives in their areas. All licensing determinations should be considered on a case by case basis. They should take into account any

representations or objections that have been received from responsible authorities or other persons and representations made by the applicant or premises users as the case may be.

- 4.3.3 The authorities determinations should be evidence based, justified as being appropriate for the promotion of the licensing objectives and proportionate to what it is intended to achieve.
- 4.3.4 Determination of whether an action or step is appropriate for the promotion of the licensing objectives requires an assessment of what action or step would be suitable to achieve that end. The local authority should seek to exercise its functions as are an appropriate and proportionate response to the causes of concern. However it is imperative that the members ensure that the factors which form the basis of its determination are limited to consideration of the promotion of the licensing objectives and nothing outside those parameters.

#### **4.4 Equality**

- 4.4.1 An equality screening prior to the potential introduction of an EMRO was carried out and is attached at **Appendix 8**. This analysis did not highlight any disproportionate adverse impacts on groups with protected characteristics. The feedback received during the informal consultation stage did not identify equality concerns. If this matter proceeds to further consultation, feedback received will be taken into consideration and review undertaken as relevant and appropriate.

#### **4.6 Consultees (Internal and External)**

##### **Internal**

Director of Customers & Communities  
Head of Public Protection  
NBC Legal Services  
NBC Senior Licensing Officers  
Finance

##### **External**

Key stakeholders and other interested parties as stated in 3.2.8 above. A list of those invited to comment is available in **Appendix 6**

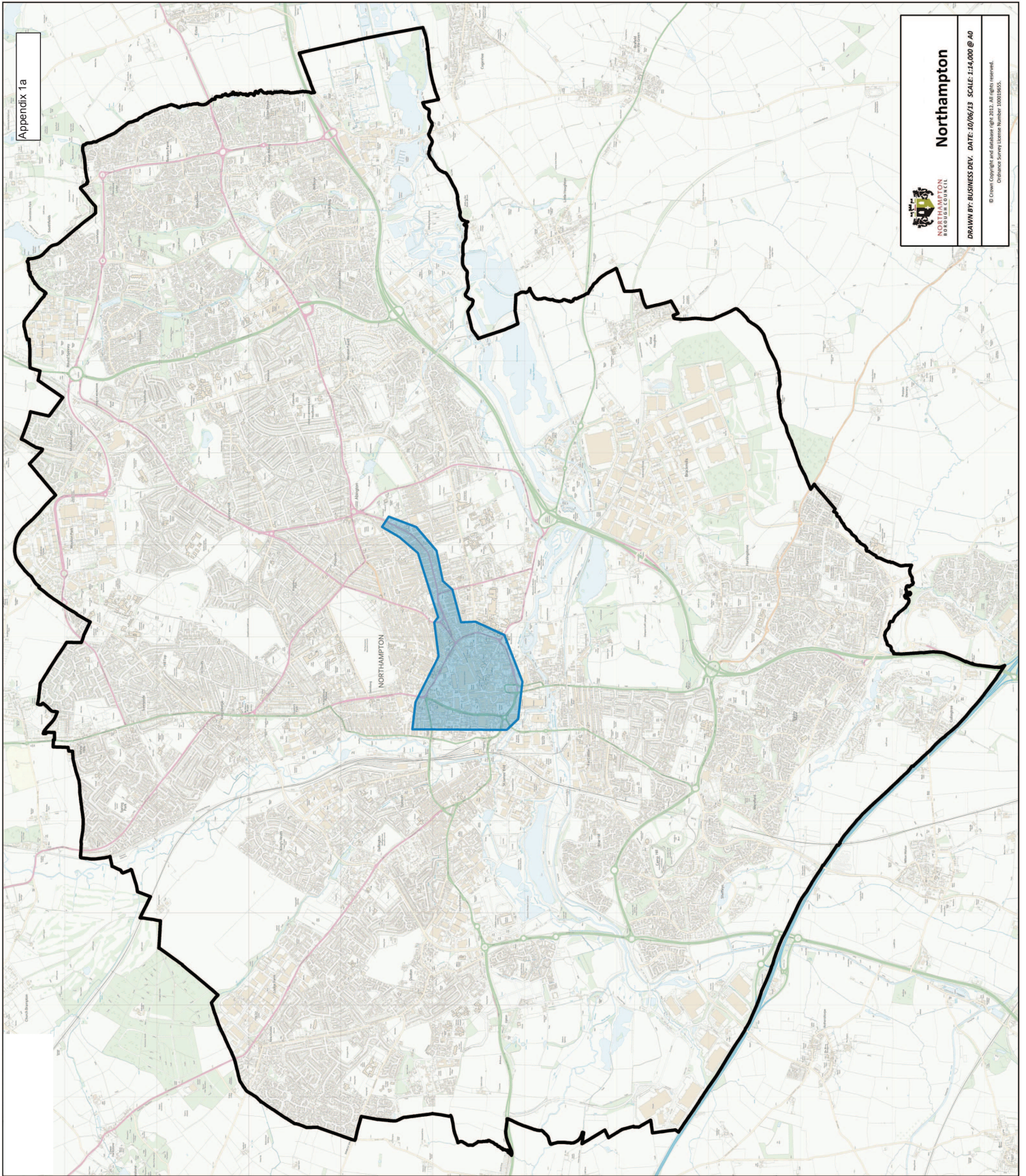
#### **4.7 Background Papers**


The Licensing Act 2003  
The Police Reform and Social Responsibility Act 2011  
Home Office Guidance Early Morning Restriction Orders  
The Licensing Act 2003 s.182 Guidance

David Kennedy  
Chief Executive

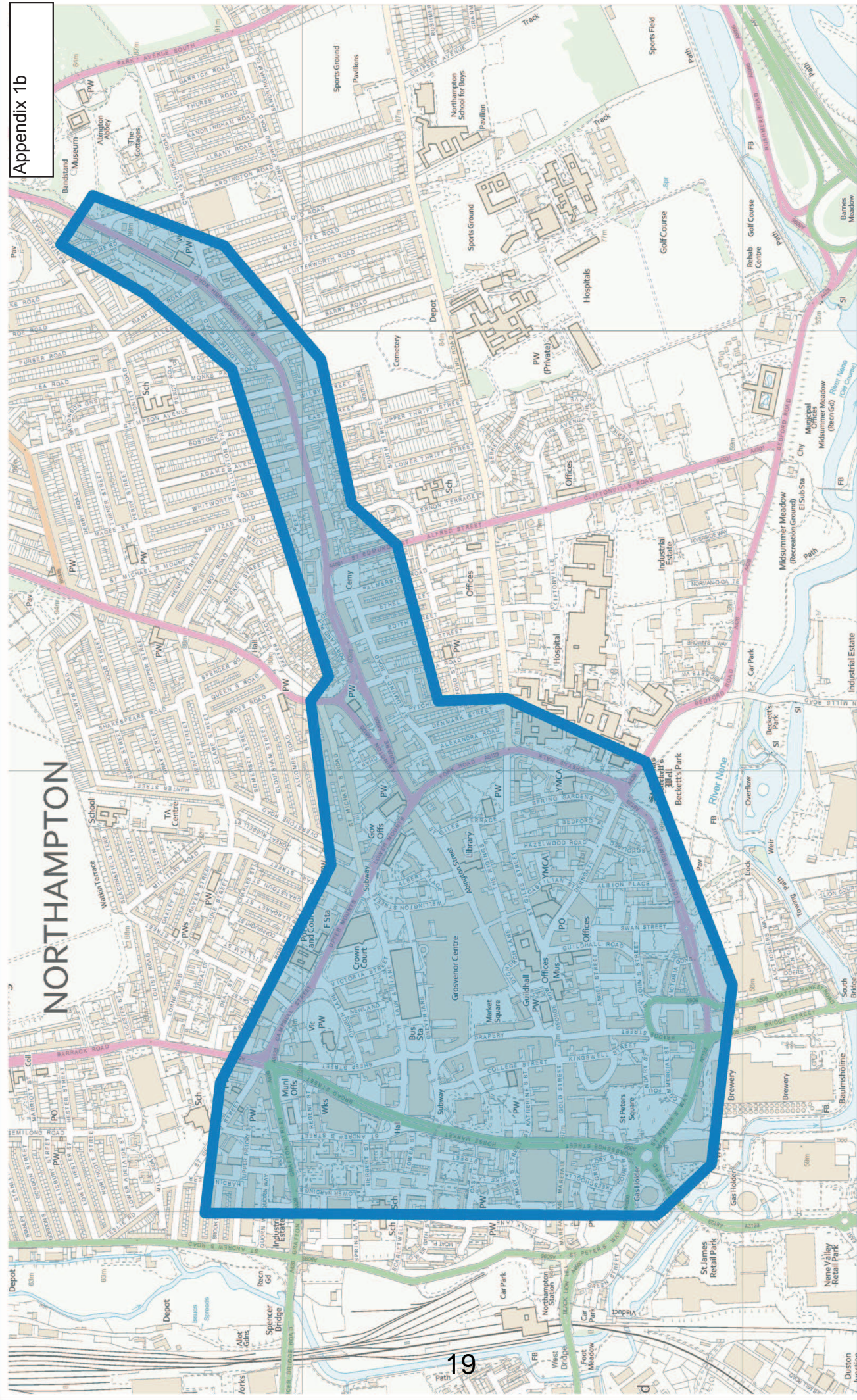


Appendix 1a



 <b>Northampton</b> BOROUGH COUNCIL
<b>DRAWN BY: BUSINESS DEV. DATE: 10/06/13 SCALE: 1:14,000 @ A0</b>
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# NORTHAMPTON

# Northampton

Date: 10th June 2013  
 Scale: NTS  
 Dept: GIS  
 Project: Licensing



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## **Licensed Premises in Northampton**

- 1.1 The following data is taken from Northampton Borough Council's (NBC) licensing system 'LalPac'. In the case of data relating to 2004, this is taken from hard copy files, as LalPac was first introduced to NBC in 2005.
- 1.2 The time of the last permitted sale of alcohol of a licensed premise has been calculated by the latest possible time on a normal weekday (excluding specific holidays such as Christmas or Bank Holidays). In most circumstances this will relate to a Friday/Saturday night or Saturday/Sunday night.
- 1.3 Licensed premises have been mapped by matching easting and northing grid references to the UPRN number of the licensed building, which is populated in LalPac.
- 1.4 Where premises within the leisure zone has been analysed in isolation, this has been done by importing data into NBC's GIS System 'Cartology,' then exporting the required data back out into excel for further analysis.
- 1.5 The tables below shows the volume of licensed premises of different types in 2004, prior to implementation of the Licensing Act (2003), compared to a snapshot from March 2013. Please note the categories of premises type differ slightly in each table, the categories used now are those in accordance with government data requests

**Figure 1: Licensed Premises in Northampton by alcohol sales (2004)**

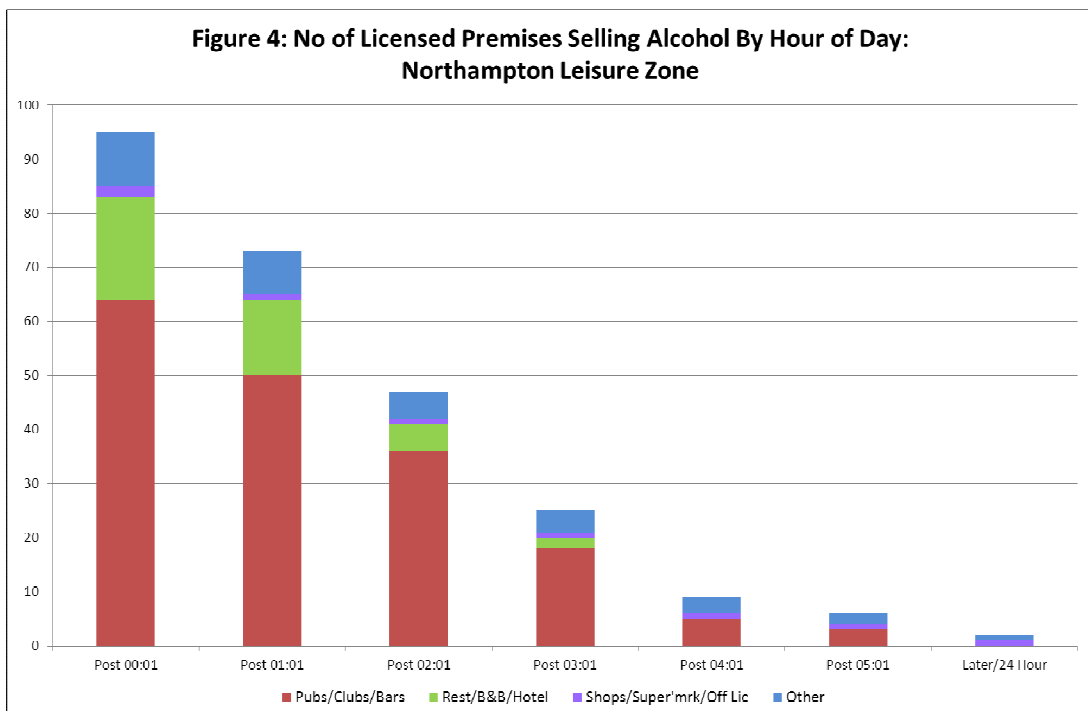
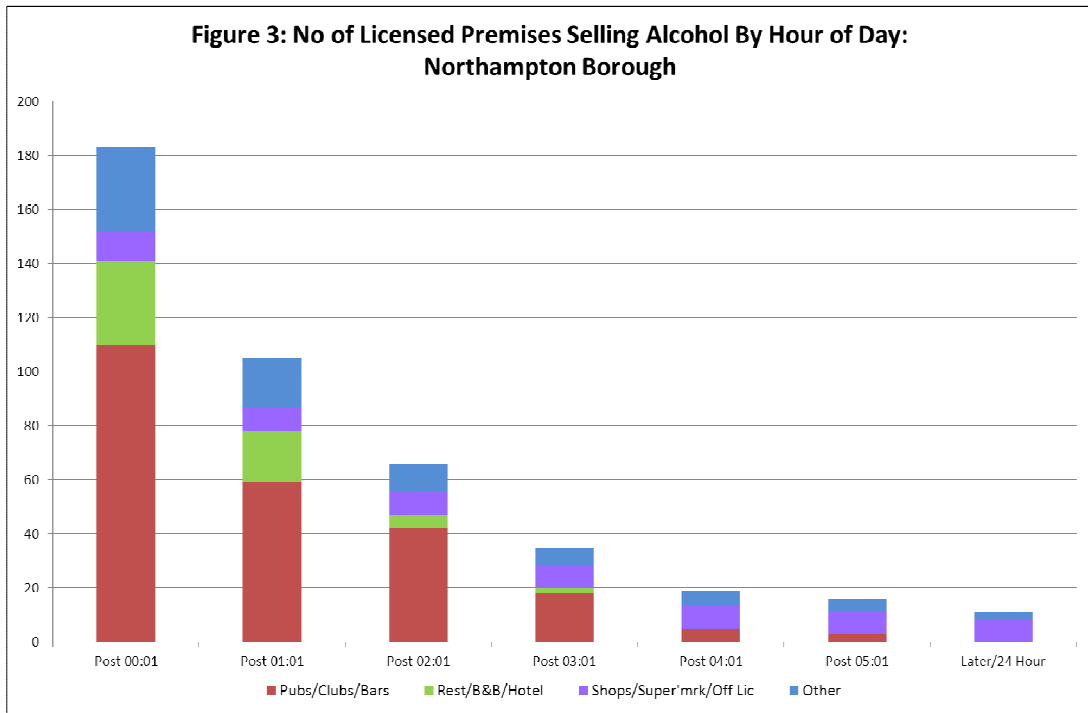
<b>Last Sale of Alc</b>	<b>All Premises</b>	<b>Pubs/ Clubs/ Bars/ Rest/ B&amp;B/ Hotel</b>	<b>Shops/ Super'mrk/ Off Licences</b>	<b>Registered Members Clubs</b>
TOTAL	596	325	191	80
Post 00:01	70	70	0	0
Post 01:01	51	51	0	0
Post 02:01	39	39	0	0
Post 03:01/Later	0	0	0	0

**Figure 2: Licensed Premises in Northampton by alcohol sales (Mar 2013)**

<b>Last Sale of Alc</b>	<b>All Premises</b>	<b>Pubs/Club s/Bars</b>	<b>Rest/B&amp;B /Hotel</b>	<b>Shops/Su per'mrk/ Off Lic</b>	<b>Other</b>
Total	589	159	114	211	105
Post 00:01	183	110	31	11	31
Post 01:01	105	59	19	9	18
Post 02:01	66	42	5	9	10
Post 03:01	35	18	2	8	7
Post 04:01	19	5	0	8	6
Post 05:01	16	3	0	8	5
Later/24 Hour	11	0	0	8	3

1.6 As shown, there has been an increase of 161% of premises selling alcohol beyond midnight, 105.9% increase in trading beyond 01:00am, 69% increase in premises trading beyond 02:00am and there are now 35 premises with an alcohol licence after 03:00am. In 2004 no premises were permitted to sell alcohol beyond 03:00am.

1.7 The charts below show a more visual representation of the current situation of alcohol licensing hours, showing the breakdown of premises permitted to sell alcohol at different times of the night. This is shown for the whole of Northampton Borough, and Northampton Leisure Zone area only.



1.8 The table below shows the proportion of premises selling alcohol at specific times of the night in the leisure economy which fall within and outside of

the leisure zone. As shown, between 02:00 – 04:00 is the period when the highest proportion of premises are within the leisure zone. This provides an overview of how many premises will be affected by an EMRO at specific times and locations.

<b>Last Sale Of Alc (2013)</b>	<b>All Premises in Borough</b>	<b>Inside LZ</b>	<b>Outside LZ</b>	<b>% Of All Premises Open within the LZ</b>
Post 00:01	183	95	88	51.9%
Post 01:01	105	73	32	69.5%
Post 02:01	66	47	19	71.2%
Post 03:01	35	25	10	71.4%
Post 04:01	19	9	10	47.4%
Post 05:01	16	6	10	37.5%

1.9 Below is a table showing every new application for an alcohol licence or variation of an existing licence to extend licensing hours since 2006 (following the licensing act coming into force in Nov 2005). As shown, 2006 had notably higher number of applications/ variations to adjust licensing hours than any other year, and there has been a gradual reduction since. However, this reduction tends to relate to changes in licensing hours prior to 01:00. Applications/variations to sell alcohol after 01:00 have remained relatively constant since 2006.

<b>YEAR</b>	<b>TOTAL</b>	<b>21:00 - 01:00</b>	<b>01:00 - 02:00</b>	<b>02:00 - 03:00</b>	<b>03:00 - 04:00</b>	<b>04:00 - LATER</b>
<b>2006</b>	26	14	6	3	1	2
<b>2007</b>	19	8	4	6	0	1
<b>2008</b>	17	4	3	2	3	5
<b>2009</b>	14	4	3	3	2	2
<b>2010</b>	14	6	2	4	1	1
<b>2011</b>	12	3	3	3	1	2
<b>2012</b>	17	6	5	4	1	1
<b>TOTAL</b>	119	45	26	25	9	14

1.9 Licensed premises are also able to apply for temporary event notices (TENS), which allows applicants to sell alcohol on a one off occasion, or extend their licensing hours on a one off occasion. As shown, there has been a steady increase in these applications, with above average (yellow) volume in the past 2 years, and significantly more applications (red) for extensions between 03:01 – 04:00 and after 05:01.

FIGURE 7: NORTHAMPTON BOROUGH - TEMPORARY EVENT NOTICES – EXTENSIONS/ONE OFF PERMISSIONS GRANTED FOR SALE OF ALCOHOL HOURS (BY DAY)							
YEAR	TOTAL	00:01 - 01:00	01:01 - 02:00	02:01 - 03:00	03:01 - 04:00	04:01 - 05:00	05:01 - Later
2006	48	21	15	3	8	1	2
2007	59	10	9	5	17	18	2
2008	44	14	13	10	6	1	2
2009	124	27	17	29	15	26	10
2010	86	23	10	6	4	23	20
2011	136	29	19	22	18	17	31
2012	183	33	20	25	43	21	41

\*This data excludes TENs for New Year's eve/day as an EMRO would not effort licensing hours on this day.

1.10 In the past year, 83.6% of the days granted as a TEN have been inside the leisure zone. Of the days granted to sell alcohol after 03:01, 93.3% (98 out of 105) have been inside the leisure zone.



# Supporting analysis for the Northampton Early Morning Restriction Order (EMRO) application

<b>Date</b>	24 <sup>th</sup> May 2013
<b>Contributors:</b>	Northamptonshire Police Northampton Borough Council

## **1 Aim**

- 1.1 This document seeks to provide evidence and contextual data to inform the application for an Early Morning Restriction Order (EMRO) within Northampton borough. The following analysis will seek to understand current issues relating to Prevention of Crime and Disorder, and Protecting Children from Harm – 2 of the 4 licensing objectives.

## **2 Scope**

- 2.1 From the outset it has been recognised that the Police are not the only agency involved in ensuring the licensing objectives are met. Northampton Borough Council, East Midlands Ambulance Service (EMAS), the NHS and the voluntary sector all contribute. Data from the Police, Northampton Borough Council, EMAS and NHS have all been included in this analysis to look beyond crime data.
- 2.2 Data from Northamptonshire Police systems has been sourced as follows:
- Crime data: Local Force crime recording system
  - Incident data: From the Steria STORM incident recording system
  - Anti-Social Behaviour data: From the Steria STORM incident recording system
- 2.3 NHS assaults data has been collected by the receptionists at point of booking patients in. A series of questions are asked of each patient to ascertain details of their assault. This is voluntary.
- 2.4 EMAS data has been sourced from the locations the ambulances pick up patients following a telephone call to the ambulance control room. This data is completed on their electronic system.
- 2.5 CCTV data from Northampton Borough Council has been compiled by the CCTV controllers and reported on their local system.
- 2.6 All data unless specified is for the period 1<sup>st</sup> April to 31<sup>st</sup> March for each period. Crime data has been analysed from 2004/5 to 2012/13 in the aforementioned time period in order to show how crime and disorder has changed since the licensing hours were changed, all the way through to the present day.
- 2.7 The analysis contained within this document refers to the Borough of Northampton (the boundary recognised by Northampton Borough Council) or an area defined as the "Leisure Zone". The Leisure Zone area has been identified through this analysis as an area that has high volumes of crimes and incidents in a small concentrated area, particularly at weekends during evening/night/early morning hours. It also encompasses the main concentration of pubs and clubs within Northampton. Figure.1 below confirms the borough boundary with Figure.2 confirming the Leisure Zone boundary, (which is already a recognised boundary for Section 27 notices.

Figure.1

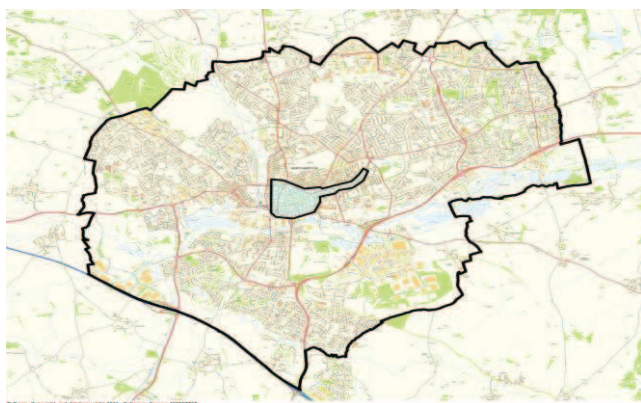


Figure.2



- 2.8 For the purposes of this document, a period of the week has been identified which has a high prevalence of crime and disorder. This is called the "Night Time Economy" (NTE) and is defined as the period 21.00-0559 on Friday/Saturday and 21.00-0559 Saturday/Sunday, as per the existing Operation Nightsafe strategy, the dedicated plan for the Police to manage crime and disorder within Northampton Leisure Zone.

### 3 Methodology

- 3.1 In seeking to provide an evidence base for the EMRO application, analysis of the different data types from the Police, EMAS and NHS has provided relevant evidence for the Crime and Disorder licensing objective.
- 3.2 Analysis of under 18 victimisation and offending supports the "Protecting Children from Harm" licensing objective.
- 3.3 Throughout the document, key points highlighted by the analysis that support the introduction of the EMRO are found in boxes. These are drawn together as part of the summary and inform the conclusion at the end of this document.

#### 3.4 Crime data:

- 3.4.1 This has been analysed in accordance with the Home Office Crime Tree 2013. All main crime types identified in the Crime Tree were initially reviewed, with those displaying crime patterns or high crime volumes within the Leisure Zone or Night time economy period analysed in more detail. This included: All Crime, Violence against the Person, Stealing, Public Disorder, Sexual Offences and Criminal Damage/Arson.
- 3.4.2 Within each of the above categories, the data was first analysed by location (grid references), then hour of day, and day of week. Where possible, it was the further split to assess how influential or prevalent certain factors were within each crime breakdown. The factors assessed were; amount of alcohol flags, whether the crime occurred in licensed premises and if there were any U18 offenders/victims. It is important to note that Alcohol flags for Crime are only recorded in relation to the offender, where known. This suggests that the actual number of offences where alcohol is a factor in a broader sense (e.g. victim was affected by alcohol) is likely to be higher.
- 3.4.3 Where the data was analysed by day and hour, each resulting data table was analysed for peaks in recorded offences against the average and +1 and +2 standard deviations. These peaks are statistically valid peaks and indicate where rises are significant and not 'normal variation'.

3.4.4 Under-18 victimisation and offending is based on the age at time of offence. For both aspects of crime, it is only where a crime is reported that we will know if it is against a young person – if they do not report it then we will not know a crime has taken place.

### **3.5 Incident data:**

3.5.1 This has been analysed in accordance with the National Standard of Incident Recording (NSIR). The categories analysed were all incidents (Anti Social Behaviour, Public Safety and Welfare, and Crime incidents but *excluding* Administration which include sub-categories of Admin Other, Cancelled, Complaints against the Police, Duplicate, Forensic Visit, Lost property, Message, Police Generated resource, Pre-planned event, Test), and Anti-Social Behaviour specifically.

3.5.2 Incidents which had a motivator of “alcohol” were also analysed but due to the way incidents on the LZ are managed at weekends (through a single operational log rather than individual incidents) the number of alcohol related incidents in the LZ is very small and not statistically valid for further analysis.

3.5.3 Incidents for Saturday and Sunday have been compared with an average for Monday-Friday as no historical data is available for 2003-4 as incidents used a completely different incident recording system and classification system.

3.5.4 Incidents which had a motivator of “Youth” were also analysed to understand incidents in the context of ‘Protecting Children from Harm’. It is important to note that the use of this flag is based on perceptions of young people being involved in the incident; there is no clear age criterion, but this provides an approximation of those incidents relating to under-18 years.

### **3.6 Mapping of data:**

3.6.1 Crime and Incident data was imported into Northgate XD mapping to produce any maps required. Anything related to the LZ was then exported back out into excel for further analysis. Where temporal analysis was conducted via Data Clocks, the data has been migrated into tables for ease of reading within this document.

3.6.2 It should be noted that some crimes and incidents were not able to be mapped using the XD system as they did not contain grid references. This can occur when crimes are known to have taken place within Northampton but the victim cannot be exactly sure where within Northampton. This could be because they have visited a number of locations during their time out and cannot identify when or where they were. Calculations comparing LZ and Non LZ areas exclude unmappable crime.

### **3.7 Other Agency Data**

- 3.7.1 Data from other agencies outside of the Police also forms part of this analysis.
- East Midlands Ambulance Service (EMAS) Pick Up Data (March 01 2012 – February 28 2013)
  - Northampton Borough Council CCTV Incident Data (January 01 2011 – December 31 2012)
  - Northampton General Hospital Accident & Emergency (A&E) Assaults Data (February 01 2011 – December 31 2012)



- 3.7.2 Due to the diverse nature of the data sets relating to EMAS, A&E and CCTV, in respect of recording practices, the 'leisure zone' is less defined than the maps above has indicated. EMAS aligns with Northants Police definition of the 'Leisure Zone'. However, A&E data coded as postcode area 'NN1' has been allocated to the 'town centre,' a proxy for the Leisure zone. CCTV incidents are allocated to camera 'zones' dependent upon which CCTV camera was used to capture the incident. All incidents allocated to 'town centre' or 'leisure zones' are attributed to the town centre.
- 3.7.3 The A&E assaults data analysed was all data within the town centre which fell under the location categories of '*licensed premises*' and '*on the street.*' Categories '*Home*' and '*Other*' were disregarded.
- 3.7.4 When analysing EMAS data, only the call outs categorised under 'Assault/Sexual Assault in the 'Chief Complaint' (reason for callout) field were analysed. This is the only category of 'Chief Complaint' which is directly related to the licensing objectives (e.g. Prevention of Crime and Disorder).
- 3.7.5 The NBC CCTV control room data analysed was all incidents classified as 'public order.' Public order incidents include the following sub categories: - drunk & disorderly, anti-social behaviour, domestic violence, juvenile nuisance, criminal damage, ABH, GBH, drunk and incapable, and begging.
- 3.7.6 It should be noted that much of this data will be captured within police recorded crime data, for example one assault may have been identified by NBC CCTV control room, attended to by EMAS and Northamptonshire Police, then the victim presented at Northampton General Hospital A&E. As a result, this data should be considered added contextual information.
- 3.7.7 It should also be noted that data for previous years does not exist for this other agency data so comparisons are unable to be shown. The analysis below therefore illustrates the current context and does not show any change over time as a consequence of later liquor licensing hours.

## **4 Crime and Disorder**

### **4.1 General**

- 4.1.1 The Leisure Zone area accounts for 1.7% of the geographical area of Northampton Borough, yet in 2012/13 22.9% of All Crime occurs in this same area, and of this volume, 27.5% occurs during the NTE period. Likewise, 15.9% of all incidents occur on the Leisure Zone, and within that 13.7% occurs during the NTE period. The NTE period accounts for 10.7% of a week (18 hours of the 168 in a week). This disproportionate amount of crime and incidents in the Leisure Zone and particularly during the NTE period highlight the specific nature of this area and its contribution to crime and disorder.

**1. The leisure zone area, and the NTE period specifically account for a disproportionate amount of crime within Northampton Borough.**

## 4.2 All crime

4.2.1 All Crime within Northampton Borough as recorded by the Police has fallen 37.3% since 2004/5. However, this reduction has not been equal across the Borough or during the course of a day. The reduction on the Leisure Zone area specifically has only fallen 24%. The proportion of crime that is within the Leisure Zone has also increased from 18.9% in 2004/5 to 22.9% in 2012/13. The table below shows how Borough and Leisure Zone crime levels have changed over time.

Year	All Crime in Northampton	All Crime In Northampton (Excl LZ)	% of Whole	All Crime In Northampton LZ	% of Whole
<b>Reduction in whole period</b>	<b>-37.3%</b>	<b>-40.4%</b>		<b>-24.0%</b>	
2012/13	19779	15250	77.1%	4529	22.9%
2011/12	20224	15975	79.0%	4249	21.0%
2010/11	19537	15519	79.4%	4018	20.6%
2009/10	21842	17338	79.4%	4504	20.6%
2008/09	23643	19176	81.1%	4467	18.9%
2007/08	26546	21414	80.7%	5132	19.3%
2006/07	285266	22936	81.1%	5330	18.9%
2005/06	29453	23562	80.0%	5891	20.0%
2004/05	31545	25587	81.1%	5958	18.9%

### 2. Crime on the leisure zone has fallen at a slower rate when compared with the rest of Northampton.

4.2.2 The Leisure Zone has produced a crime pattern that is different to the rest of the Borough. This is not unusual given the concentration of shops and retail outlets within the area. However, it is not just day time crime that has changed, crime occurring during evenings and early mornings has changed too.

4.2.3 Analysis of crime by hour and day has shown a diverging trend when looking at the Borough and Leisure Zones separately. Over a third of crime occurring in the NTE for the whole Borough takes place within the Leisure Zone. Furthermore, within the Leisure Zone, the highest volume of offending takes place during the NTE. 27.4% of crime occurred between 21.00-05.59 Friday/Saturday & Saturday/Sunday in 2012/13 compared with 20.6% in 2004/5 and 22.1% in 2005/6 (the first year after the licensing hours were relaxed nationally).

### 3. Within the Leisure Zone, over a quarter of crime takes place within the NTE period

4.2.4 The tables below show the LZ crime volume during 2004/5 and 2012/13. The peak of crime in 2004/5 was between 23.00 and 02.59 and moderate crime levels only continued until 03.59. However, this has gradually shifted over time and by 2012/13 this peak had extended to between 00:00 and 04:59 on Friday/Saturday/Sunday.

All Crime within Northampton Leisure Zone							
2004/05	MON/ TUES	TUE/ WEDS	WED/ THURS	THURS/ FRI	FRI/ SAT	SAT/ SUN	SUN/ MON
12:00-12:59	44	54	48	41	32	41	30
13:00-13:59	44	54	68	44	54	50	21
14:00-14:59	52	58	65	54	61	65	25
15:00-15:59	75	74	82	64	78	74	24
16:00-16:59	66	60	52	69	61	75	15
17:00-17:59	45	47	47	46	58	58	16
18:00-18:59	28	20	20	45	23	32	14
19:00-19:59	23	23	24	28	24	20	17
20:00-20:59	17	22	17	27	19	22	21
21:00-21:59	20	28	24	18	23	30	25
22:00-22:59	19	23	30	29	55	63	35
23:00-23:59	32	45	60	56	109	105	42
00:00-00:59	48	52	93	86	132	98	92
01:00-01:59	29	11	48	28	121	105	39
02:00-02:59	20	13	40	28	123	88	22
03:00-03:59	8	5	20	14	62	65	8
04:00-04:59	5	1	11	10	23	17	4
05:00-05:59	5	6	4	2	4	3	1
06:00-06:59	10	5	9	5	10	6	7
07:00-07:59	15	8	12	11	13	8	13
08:00-08:59	25	15	14	23	17	7	25
09:00-09:59	28	26	24	22	18	9	28
10:00-10:59	31	17	25	24	27	19	26
11:00-11:59	42	37	36	40	37	21	21

All Crime within Northampton Leisure Zone							
2012/13	MON/ TUES	TUE/ WEDS	WED/ THURS	THURS/ FRI	FRI/ SAT	SAT/ SUN	SUN/ MON
12:00-12:59	37	39	35	35	44	31	29
13:00-13:59	26	34	42	33	37	38	33
14:00-14:59	48	52	45	37	35	35	23
15:00-15:59	39	36	46	40	41	45	18
16:00-16:59	42	33	52	44	45	47	18
17:00-17:59	18	42	42	37	39	31	13
18:00-18:59	21	21	17	24	25	24	16
19:00-19:59	22	18	9	17	21	10	21
20:00-20:59	10	11	17	13	15	20	14
21:00-21:59	18	16	17	15	26	26	12
22:00-22:59	14	10	15	15	26	27	16
23:00-23:59	26	22	17	18	56	63	28
00:00-00:59	14	19	25	23	47	85	25
01:00-01:59	14	20	17	23	83	180	20
02:00-02:59	15	18	22	33	130	162	15
03:00-03:59	11	23	19	30	80	94	9
04:00-04:59	15	7	9	16	54	58	17
05:00-05:59	9	5	4	3	18	28	8
06:00-06:59	2	1	5	3	16	18	6
07:00-07:59	8	9	7	11	5	5	7
08:00-08:59	18	14	15	15	9	7	14
09:00-09:59	18	10	11	17	18	14	17
10:00-10:59	26	31	27	26	19	11	21
11:00-11:59	29	23	33	27	22	18	24

4.2.5 This extension of crime to latter hours of Saturday and Sunday mornings on the Leisure Zone is impacting on one of the licensing objectives – the Prevention of Crime and Disorder. A growing volume and proportion of crime is now taking place after 03.00 Saturday and Sunday mornings which previously did not occur. The proportion of NTE crime which took place during 03.00-05.59 on a Saturday/Sunday has increased from 14.2% in 2004/5 to 26.7% in 2012/13.

**4. Crime occurring on the leisure zone between 03.00-05.59 Saturday and Sunday mornings is increasing in volume and proportion terms. The public are subject to more crime and disorder during this time than they have in the past, thus not meeting the licensing objective of Prevention of Crime and Disorder.**

4.2.6 Analysis of crime types has identified that nearly three quarters of offending which took place during the NTE period related to Stealing or Violence (71.4%) during 2012/13. This has increased when compared with 2004/5 from 67.1%. In terms of achieving the licensing objective of the Prevention of crime and disorder, activity that tackles reducing stealing and violence is of particular interest. Whilst it is understood that an element of reported stealing could relate to fraudulent claims for lost mobile phones or devices, research carried out by the Jill Dando Institute reveals this would only be 10% of cases.

	No. of Crimes 2012/13	No. of Crimes during NTE hours 2012/13	% of all NTE crime 2012/13	% of all NTE crime 2004/05
Stealing	11223	1215	42.6%	40.7%
Violence Against The Person	3536	820	28.8%	26.4%
Criminal Damage & Arson	3177	405	14.2%	21.9%
Drug Offences	689	171	6.0%	2.0%
Public Disorder	494	113	4.0%	3.0%
Sexual Offences	351	62	2.2%	1.2%
Fraud & Forgery	255	14	0.5%	4.3%
Crimes Disrupted	221	45	1.6%	1.0%
Other Non Victim Based	81	6	0.2%	2.6%
<b>ALL CRIME</b>	<b>20,027</b>	<b>2,851</b>		

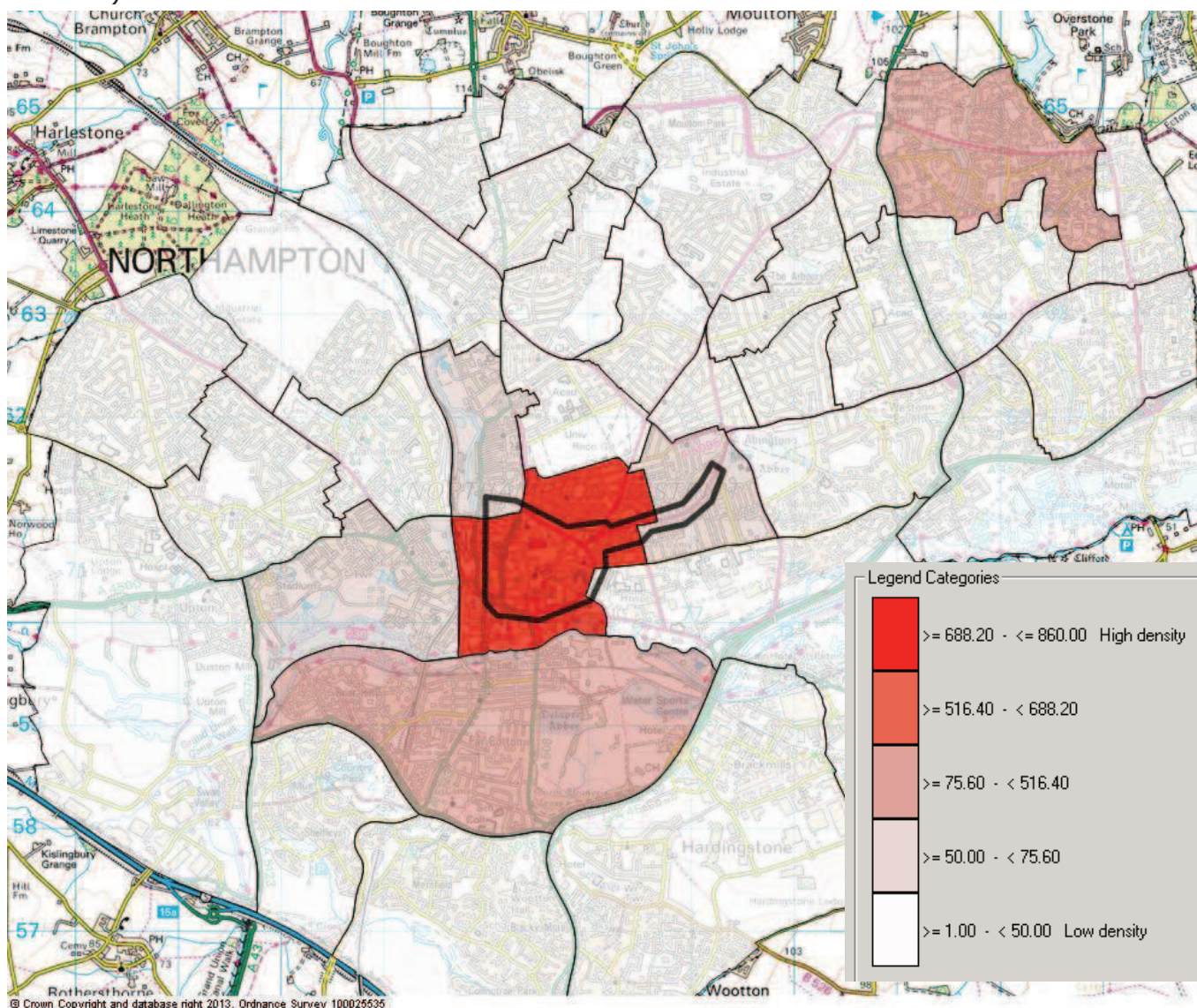
4.2.7 Of the 20,027 all crime offences recorded for Northampton Borough in 2012/13, 9.4% had an alcohol flag. It is important to note that this is likely to be an underestimate of the actual proportion of alcohol related offences (see 3.6.2). It is not possible to analyse how the proportion of alcohol-related offences has changed since 2004/5, as this flag was only introduced as a mandatory field in 1<sup>st</sup> April 2008.

4.2.8 40.7% (763) of alcohol-related all crime took place during the NTE period. Highest on Saturday 02:00-03:59 and Sunday 00:00-03:59.

4.2.9 The majority of alcohol-related crimes in 2012/13 were violence offences (77.9%), followed by Public Disorder (12.3%). Alcohol motivated crimes are not just confined to the Leisure Zone. Figure.3 below shows that alcohol flagged crimes do occur elsewhere on the Borough but to a far lesser extent. The majority are confined to two wards that the Leisure Zone forms part of.



Figure 3. All Crime across the Borough with an Offender Drink related tag (split by Wards):



**5. Where alcohol has been identified as a factor for the offender, the majority are violence against the person, and a large proportion occur within the Leisure Zone and NTE period.**

### 4.3 Violence against the person

4.3.1 With Violence against the person identified as a significant proportion of crime during the NTE period, and the majority of alcohol flagged crime as violence, this next section concentrates on the pattern of violence against the person.

4.3.2 During 2012/13, 3536 crimes of violence against the person were recorded in Northampton Borough. This is a reduction of 21.7% compared with 2004/5 levels, which is a much slower rate of reduction than for all crime (37.5%). Violence offences account for an increasing proportion of all crime (from 13.1% in 2004/5 to 17.9% in 2012/13).

\*From this overall data, between 0.1% and 1.4% of crime was unable to be mapped, due to the victim being unable to say exactly where the crime happened. The below data reflects only mapped data.

Year	Violence in Northampton (Excl LZ)	Violence in Northampton (Excl LZ) NTE	Violence in Northampton (Excl LZ) 03:00-05:59	Violence in Northampton LZ	Violence in Northampton LZ NTE	Violence in Northampton LZ 03:00-05:59	% of All Crime on Northampton
<b>Reduction in whole period</b>	<b>-20.4%</b>	<b>-19.9%</b>	<b>52.8%</b>	<b>-26.9%</b>	<b>-28.6%</b>	<b>91.2%</b>	
2012/13	2615	472	110	873	340	109	17.9
2011/12	2873	483	88	973	385	111	19.2
2010/11	2818	513	95	998	431	97	19.7
2009/10	2805	506	94	970	446	123	17.4
2008/09	2512	508	86	830	350	107	14.2
2007/08	3079	702	87	1196	610	130	16.1
2006/07	2866	602	98	1084	516	102	14
2005/06	3018	581	94	1119	490	72	14.1
2004/05	3286	589	72	1194	476	57	13.1

4.3.3 The table above shows that although violence has reduced over the 9 year period, it accounts for an increasing proportion of All Crime in more recent years (far right column). The rate of reduction for violence is also lower than All Crime and remains a focus for the Police and Northampton CSP. Crucially it shows the change in violence between the 03:00-05:59 period. There is a 91.2% increase in recorded violence on the Leisure Zone between 2004/05 and 2012/13, from 57 crimes to 109. This is also reflected in Northampton (excl LZ) albeit an increase of 52.8%

4.3.4 25.0% of all violence occurred on the Leisure Zone in 2012/13. This has remained relatively stable over the last 9 years.

**6. Violence is reducing at a slower rate than All crime and accounts for a higher proportion of all crime in recent years than it did in 2004/5.**

**7. Violence on the leisure zone is decreasing overall, but the within 03:00-05:59 it is increasing**

4.3.5 14.2% of violence offences in 2012/13 took place during the Night time Economy period, which was slightly lower in 2004/5 (14.1%). This is the case for the wider Borough and the Leisure Zone. This small time period accounts for a disproportionate volume of violence compared with the number of hours it makes up.

4.3.6 When looking at the hour by hour totals for the Borough and Leisure Zone, it is clear that 2012/13 violence is spread over a longer period within the NTE whereas 2004/5 was more concentrated to a smaller range. The leisure zone shows a particularly strong extension of hours. The tables below show the volume of violence by hour and day for 2004/5 and 2012/13 for the leisure zone.

VAP within Northampton Leisure Zone							
2004/05	MON/ TUES	TUE/ WEDS	WED/ THURS	THURS/ FRI	FRI/ SAT	SAT/ SUN	SUN/ MON
12:00-12:59	4	3	2	4	2	1	3
13:00-13:59	7	5	5	3	5	3	2
14:00-14:59	7	4	5	7	7	11	3
15:00-15:59	8	12	6	7	10	10	0
16:00-16:59	9	8	3	7	6	8	4
17:00-17:59	7	4	7	3	3	12	5
18:00-18:59	10	6	3	2	2	6	1
19:00-19:59	2	5	4	5	1	6	5
20:00-20:59	3	4	3	6	3	7	9
21:00-21:59	4	7	7	2	9	17	7
22:00-22:59	5	2	7	6	13	21	8
23:00-23:59	8	10	14	13	36	38	16
00:00-00:59	8	1	13	14	39	32	17
01:00-01:59	7	3	25	6	65	56	21
02:00-02:59	8	3	11	19	67	26	10
03:00-03:59	2	0	6	6	21	26	2
04:00-04:59	1	0	5	2	6	3	0
05:00-05:59	1	2	1	0	1	0	0
06:00-06:59	1	2	2	2	0	2	0
07:00-07:59	0	1	0	0	2	0	1
08:00-08:59	1	3	1	2	1	0	0
09:00-09:59	4	5	1	2	0	1	4
10:00-10:59	3	4	2	2	2	1	4
11:00-11:59	1	5	3	6	5	2	5

VAP within Northampton Leisure Zone							
2005/06	MON/ TUES	TUE/ WEDS	WED/ THURS	THURS/ FRI	FRI/ SAT	SAT/ SUN	SUN/ MON
12:00-12:59	4	6	4	4	5	3	1
13:00-13:59	2	3	5	4	10	5	4
14:00-14:59	6	5	3	3	8	7	1
15:00-15:59	2	11	7	4	15	9	6
16:00-16:59	5	11	4	7	10	10	3
17:00-17:59	0	5	5	3	10	7	4
18:00-18:59	1	6	3	5	10	6	0
19:00-19:59	4	7	2	3	5	5	3
20:00-20:59	3	8	1	3	9	8	4
21:00-21:59	4	5	3	7	3	9	7
22:00-22:59	7	5	4	2	16	19	9
23:00-23:59	5	6	5	11	37	33	13
00:00-00:59	2	4	7	10	35	41	7
01:00-01:59	6	1	14	10	41	61	13
02:00-02:59	7	3	21	6	66	57	10
03:00-03:59	2	2	5	5	25	30	5
04:00-04:59	2	2	0	1	5	9	1
05:00-05:59	0	1	1	1	2	1	2
06:00-06:59	0	1	0	1	1	1	2
07:00-07:59	0	2	0	1	0	0	1
08:00-08:59	1	0	3	0	2	2	3
09:00-09:59	1	2	4	1	2	1	1
10:00-10:59	2	2	1	1	1	0	1
11:00-11:59	5	0	3	1	5	0	3

	VAP within Northampton Leisure Zone							
2006/07	MON/ TUES	TUE/ WEDS	WED/ THURS	THURS/ FRI	FRI/ SAT	SAT/ SUN	SUN/ MON	
12:00-12:59	5	1	2	1	6	10	2	
13:00-13:59	5	7	2	6	4	2	2	
14:00-14:59	8	3	5	5	5	2	0	
15:00-15:59	8	3	7	6	5	9	1	
16:00-16:59	3	2	3	6	7	7	3	
17:00-17:59	3	2	3	4	7	6	5	
18:00-18:59	3	4	2	10	4	7	2	
19:00-19:59	2	1	5	6	5	9	5	
20:00-20:59	6	2	0	4	3	13	4	
21:00-21:59	2	5	3	2	22	20	5	
22:00-22:59	4	3	4	2	34	36	5	
23:00-23:59	13	7	10	13	31	42	8	
00:00-00:59	8	6	6	9	41	62	7	
01:00-01:59	16	5	17	9	65	45	16	
02:00-02:59	3	2	8	9	36	37	6	
03:00-03:59	1	1	3	1	14	9	2	
04:00-04:59	2	1	1	1	4	2	1	
05:00-05:59	0	0	0	0	1	2	1	
06:00-06:59	0	2	1	2	1	0	0	
07:00-07:59	0	0	0	2	2	0	1	
08:00-08:59	2	3	1	2	2	1	0	
09:00-09:59	5	3	1	1	0	4	0	
10:00-10:59	3	2	3	3	4	3	0	
11:00-11:59	3	3	2	3	5	1	2	
	VAP within Northampton Leisure Zone							
2007/08	MON/ TUES	TUE/ WEDS	WED/ THURS	THURS/ FRI	FRI/ SAT	SAT/ SUN	SUN/ MON	
12:00-12:59	5	2	1	4	6	1	3	
13:00-13:59	3	1	3	6	6	4	3	
14:00-14:59	2	6	5	7	2	4	5	
15:00-15:59	6	8	7	3	3	8	5	
16:00-16:59	8	9	1	9	4	8	9	
17:00-17:59	7	4	10	1	2	9	4	
18:00-18:59	3	5	3	2	4	7	3	
19:00-19:59	1	10	2	5	8	3	6	
20:00-20:59	5	3	4	1	1	6	5	
21:00-21:59	1	2	3	5	5	20	5	
22:00-22:59	1	5	2	5	26	18	6	
23:00-23:59	7	9	7	3	44	45	10	
00:00-00:59	9	6	6	10	50	39	12	
01:00-01:59	14	6	14	11	62	51	10	
02:00-02:59	3	1	10	8	56	64	7	
03:00-03:59	5	5	10	11	43	47	6	
04:00-04:59	1	1	1	2	18	12	3	
05:00-05:59	0	0	0	1	8	2	2	
06:00-06:59	0	1	0	1	1	1	1	
07:00-07:59	0	0	1	1	0	2	0	
08:00-08:59	0	2	1	1	1	0	0	
09:00-09:59	4	0	0	1	0	1	1	
10:00-10:59	3	3	1	0	0	0	3	
11:00-11:59	3	3	2	0	5	4	1	



VAP within Northampton Leisure Zone							
2008/09	MON/ TUES	TUE/ WEDS	WED/ THURS	THURS/ FRI	FRI/ SAT	SAT/ SUN	SUN/ MON
12:00-12:59	4	5	0	2	1	6	1
13:00-13:59	2	0	7	4	2	4	3
14:00-14:59	4	1	4	4	6	9	3
15:00-15:59	3	5	3	1	5	7	2
16:00-16:59	5	6	7	3	5	9	2
17:00-17:59	6	4	3	3	3	5	4
18:00-18:59	6	4	3	2	2	3	2
19:00-19:59	2	2	5	4	1	7	3
20:00-20:59	5	2	1	4	5	5	5
21:00-21:59	0	4	0	3	3	13	6
22:00-22:59	2	5	1	2	7	7	5
23:00-23:59	4	5	2	6	16	18	5
00:00-00:59	6	5	18	5	18	29	9
01:00-01:59	3	5	9	2	27	35	6
02:00-02:59	5	7	15	6	26	44	1
03:00-03:59	5	2	8	3	35	31	6
04:00-04:59	2	2	2	5	18	14	1
05:00-05:59	0	1	0	0	5	4	1
06:00-06:59	1	0	0	0	0	5	1
07:00-07:59	1	0	0	0	0	3	0
08:00-08:59	0	0	2	0	1	2	0
09:00-09:59	1	0	1	0	0	0	4
10:00-10:59	2	1	0	3	4	2	2
11:00-11:59	2	3	3	2	3	2	3

VAP within Northampton Leisure Zone							
2009/10	MON/ TUES	TUE/ WEDS	WED/ THURS	THURS/ FRI	FRI/ SAT	SAT/ SUN	SUN/ MON
12:00-12:59	3	6	4	5	1	2	2
13:00-13:59	2	1	4	1	0	1	0
14:00-14:59	2	2	3	2	7	8	2
15:00-15:59	8	3	4	5	8	7	4
16:00-16:59	6	4	5	2	3	4	0
17:00-17:59	6	7	9	2	4	7	0
18:00-18:59	1	0	5	6	5	4	2
19:00-19:59	2	3	3	2	8	8	5
20:00-20:59	1	3	6	2	4	4	8
21:00-21:59	1	3	3	2	5	10	3
22:00-22:59	1	0	3	4	6	12	4
23:00-23:59	1	8	5	15	16	16	10
00:00-00:59	5	3	5	8	22	32	7
01:00-01:59	5	2	5	18	40	48	7
02:00-02:59	10	3	9	13	51	65	10
03:00-03:59	17	2	6	10	35	38	3
04:00-04:59	3	0	4	2	12	24	4
05:00-05:59	2	0	1	2	7	7	1
06:00-06:59	0	2	0	0	3	3	0
07:00-07:59	0	1	0	0	4	0	0
08:00-08:59	0	1	1	0	4	2	0
09:00-09:59	1	2	0	1	1	1	3
10:00-10:59	3	1	2	5	0	0	0
11:00-11:59	2	4	1	2	2	1	3

	VAP within Northampton Leisure Zone							
2010/11	MON/ TUES	TUE/ WEDS	WED/ THURS	THURS/ FRI	FRI/ SAT	SAT/ SUN	SUN/ MON	
12:00-12:59	10	5	5	3	4	5	2	
13:00-13:59	1	0	5	2	3	7	3	
14:00-14:59	4	5	4	7	4	5	3	
15:00-15:59	4	3	5	3	4	4	1	
16:00-16:59	5	2	8	6	9	4	4	
17:00-17:59	3	6	1	2	1	0	3	
18:00-18:59	5	5	5	9	7	3	5	
19:00-19:59	5	5	4	2	2	3	3	
20:00-20:59	0	1	5	8	4	8	2	
21:00-21:59	2	5	3	6	5	5	2	
22:00-22:59	6	4	3	4	10	17	5	
23:00-23:59	6	6	9	4	16	25	4	
00:00-00:59	7	6	7	8	26	36	6	
01:00-01:59	8	10	8	8	37	63	6	
02:00-02:59	8	8	4	6	38	56	10	
03:00-03:59	17	11	12	7	22	31	5	
04:00-04:59	3	2	1	4	10	14	5	
05:00-05:59	0	0	1	1	9	11	0	
06:00-06:59	0	0	0	1	1	4	1	
07:00-07:59	2	0	0	2	0	1	1	
08:00-08:59	1	1	1	0	1	0	0	
09:00-09:59	0	1	0	2	1	5	3	
10:00-10:59	1	1	3	5	1	1	3	
11:00-11:59	4	3	2	3	4	1	2	
	VAP within Northampton Leisure Zone							
2011/12	MON/ TUES	TUE/ WEDS	WED/ THURS	THURS/ FRI	FRI/ SAT	SAT/ SUN	SUN/ MON	
12:00-12:59	3	4	5	2	11	4	4	
13:00-13:59	7	2	4	3	8	1	3	
14:00-14:59	6	3	3	4	4	3	2	
15:00-15:59	4	5	10	7	4	5	8	
16:00-16:59	1	11	2	7	5	11	1	
17:00-17:59	3	2	3	5	8	6	3	
18:00-18:59	3	4	6	0	6	7	0	
19:00-19:59	5	1	4	2	7	6	3	
20:00-20:59	1	4	6	4	9	5	6	
21:00-21:59	3	6	4	2	11	12	3	
22:00-22:59	1	4	5	12	15	23	5	
23:00-23:59	0	6	5	4	19	34	7	
00:00-00:59	8	6	2	13	26	49	2	
01:00-01:59	3	10	3	13	22	49	6	
02:00-02:59	4	8	9	18	25	35	2	
03:00-03:59	3	5	2	11	24	22	9	
04:00-04:59	0	0	2	3	2	3	0	
05:00-05:59	1	2	0	0	1	7	0	
06:00-06:59	1	1	1	1	0	2	0	
07:00-07:59	1	1	0	0	2	4	0	
08:00-08:59	3	2	0	1	1	4	3	
09:00-09:59	3	2	2	2	3	0	3	
10:00-10:59	2	1	7	4	3	4	2	
11:00-11:59	2	7	7	2	3	2	7	

	VAP within Northampton Leisure Zone							
2012/13	MON/ TUES	TUE/ WEDS	WED/ THURS	THURS/ FRI	FRI/ SAT	SAT/ SUN	SUN/ MON	
12:00-12:59	3	1	3	4	2	2	2	
13:00-13:59	2	6	1	4	4	5	4	
14:00-14:59	2	4	3	6	3	3	3	
15:00-15:59	2	5	6	2	5	7	2	
16:00-16:59	6	2	6	1	7	4	3	
17:00-17:59	1	6	6	2	7	6	2	
18:00-18:59	0	7	6	2	7	7	6	
19:00-19:59	5	3	2	4	6	3	3	
20:00-20:59	2	2	8	1	3	8	4	
21:00-21:59	3	4	3	0	7	7	5	
22:00-22:59	2	1	3	4	5	7	4	
23:00-23:59	8	8	6	3	17	19	6	
00:00-00:59	4	5	6	4	13	13	12	
01:00-01:59	2	10	4	6	20	46	9	
02:00-02:59	4	9	4	12	48	29	7	
03:00-03:59	5	10	8	8	23	29	3	
04:00-04:59	8	2	2	11	23	18	7	
05:00-05:59	2	0	1	0	5	11	0	
06:00-06:59	0	0	1	0	5	4	2	
07:00-07:59	0	0	0	0	0	0	0	
08:00-08:59	1	0	1	0	2	0	1	
09:00-09:59	1	3	1	3	2	4	1	
10:00-10:59	3	2	2	3	2	1	2	
11:00-11:59	5	0	3	0	5	1	3	

4.3.7 The peak times for violence have extended from 23.00-02.59 on Friday/Saturday/Sunday, in 2004/5 to include 03.00-04.59 on a Saturday/Sunday morning in 2012/13. This extension is not achieving the licensing objective of Preventing Crime and Disorder.

**8. Violence on the Leisure Zone remains statistically higher for a longer period of time in 2012/13 than in previous years and since the licensing laws were relaxed.**

4.3.8 The proportion of Night Time Economy violence on the Leisure Zone which took place specifically between 03.00-05.59 on a Saturday/Sunday, has increased from 12% in 2004/5 to 32.1% in 2012/13 (an increase of 91% in volume terms). This 3 hour period is accounting for a much larger volume of violence than it ever has and the table below shows how the volume has increased since the licensing laws were relaxed on selling alcohol.

		<b>00:00-00:59</b>			<b>01:00-01:59</b>		
<b>Year</b>	<b>VAP in Northampton LZ 2012/13</b>	<b>VAP in Northampton LZ 2004/05</b>	<b>% Change</b>	<b>Year</b>	<b>VAP in Northampton LZ 2012/13</b>	<b>VAP in Northampton LZ 2004/05</b>	<b>% Change</b>
Mon	12	17	-29.4%	Mon	9	21	-57.1%
Tues	4	8	-50.0%	Tues	2	7	-71.4%
Weds	5	1	400.0%	Weds	10	3	233.3%
Thurs	6	13	-53.8%	Thurs	4	25	-84.0%
Fri	4	14	-71.4%	Fri	6	6	0.0%
Sat	13	39	-66.7%	Sat	20	65	-69.2%
Sun	13	32	-59.4%	Sun	46	56	-17.9%
<b>Total</b>	<b>57</b>	<b>124</b>	<b>-54.0%</b>	<b>Total</b>	<b>97</b>	<b>183</b>	<b>-47.0%</b>
<b>Sat/Sun Total</b>	<b>26</b>	<b>71</b>	<b>-63.4%</b>	<b>Sat/Sun Total</b>	<b>66</b>	<b>121</b>	<b>-45.5%</b>

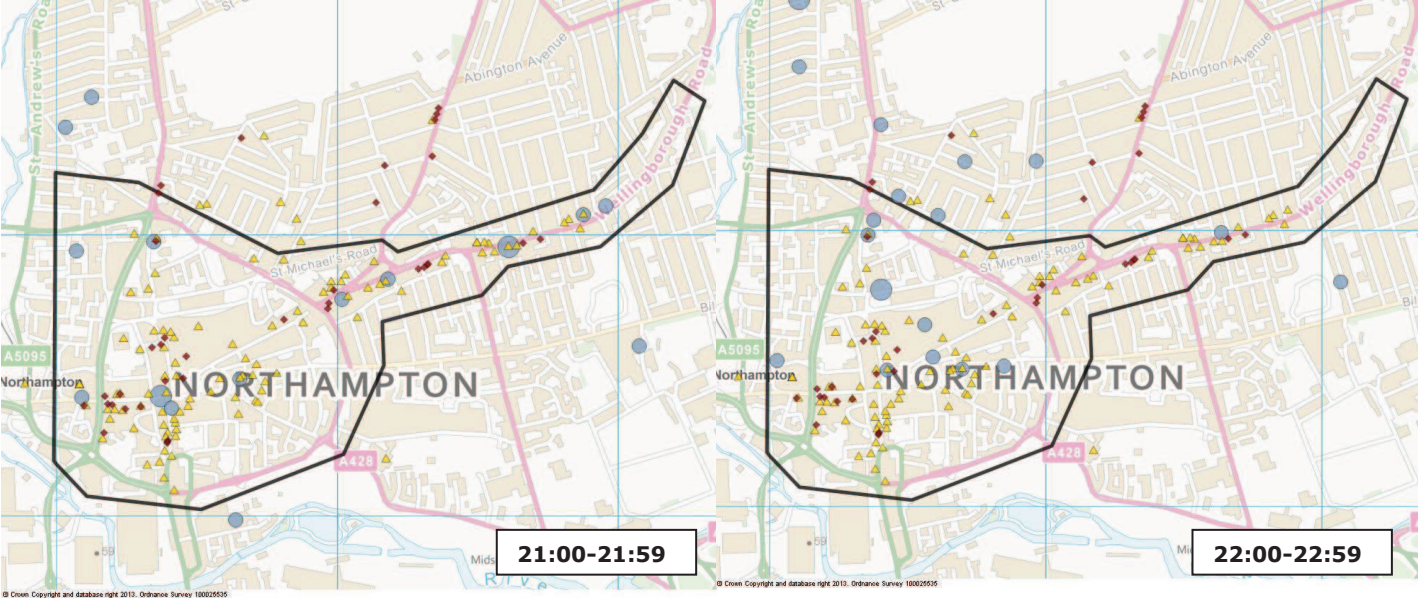
		<b>02:00-02:59</b>			<b>03:00-03:59</b>		
<b>Year</b>	<b>VAP in Northampton LZ 2012/13</b>	<b>VAP in Northampton LZ 2004/05</b>	<b>% Change</b>	<b>Year</b>	<b>VAP in Northampton LZ 2012/13</b>	<b>VAP in Northampton LZ 2004/05</b>	<b>% Change</b>
Mon	7	10	-30.0%	Mon	3	2	50.0%
Tues	4	8	-50.0%	Tues	5	2	150.0%
Weds	9	3	200.0%	Weds	10	0	#DIV/0!
Thurs	4	11	-63.6%	Thurs	8	6	33.3%
Fri	12	19	-36.8%	Fri	8	6	33.3%
Sat	48	67	-28.4%	Sat	23	21	9.5%
Sun	29	26	11.5%	Sun	29	26	11.5%
<b>Total</b>	<b>113</b>	<b>144</b>	<b>-21.5%</b>	<b>Total</b>	<b>86</b>	<b>63</b>	<b>36.5%</b>
<b>Sat/Sun Total</b>	<b>77</b>	<b>93</b>	<b>-17.2%</b>	<b>Sat/Sun Total</b>	<b>52</b>	<b>47</b>	<b>10.6%</b>

04:00-04:59				05:00-05:59			
Year	VAP in Northampton LZ 2012/13	VAP in Northampton LZ 2004/05	% Change	Year	VAP in Northampton LZ 2012/13	VAP in Northampton LZ 2004/05	% Change
Mon	7	0		Mon	0	0	
Tues	8	1	700.0%	Tues	2	1	100.0%
Weds	2	0		Weds	0	2	-100.0%
Thurs	2	5	-60.0%	Thurs	1	1	0.0%
Fri	11	2	450.0%	Fri	0	0	
Sat	23	6	283.3%	Sat	5	1	400.0%
Sun	18	3	500.0%	Sun	11	0	
<b>Total</b>	<b>71</b>	<b>17</b>	<b>317.6%</b>	<b>Total</b>	<b>19</b>	<b>5</b>	<b>280.0%</b>
<b>Sat/Sun Total</b>	<b>41</b>	<b>9</b>	<b>355.6%</b>	<b>Sat/Sun Total</b>	<b>16</b>	<b>1</b>	<b>1500.0%</b>

**9. Violence on the Leisure Zone between 03.00-05.59 has increased by 91% between 2004/5 and 2012/13.**

4.3.9 The pattern of violence during 2012/13 and within the NTE period shows wide dispersal from 21.00 and increased concentration towards a single area from 02.00. The maps below show the progression of violence between 21.00 and 05.59. The high volume that still exists after 03.00 is different to previous years, especially prior to the extension of the licensing hours. When compared with the locations of licensed premises and food outlets open at each hour, there is a clear correlation as can be seen in figure.4 below.

Figure.4

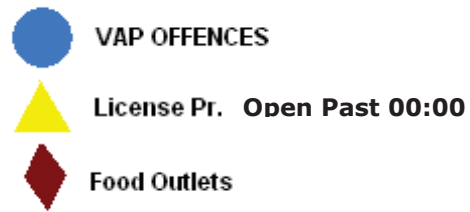
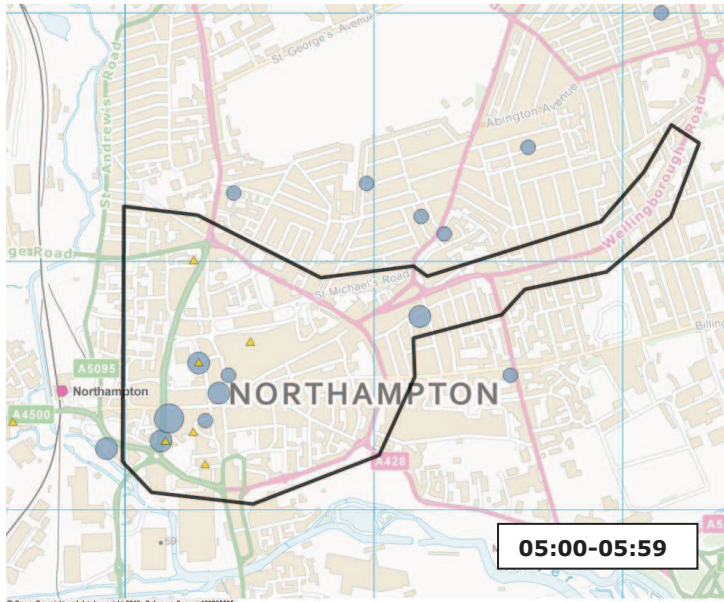






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**10. There is a concentration of violence after 02.00 within a specific area of the leisure Zone, in close proximity to open licensed premises, and a disproportionate amount of violence 03.00-05.59 in the same area.**

4.3.10 41.3% of violence is alcohol flagged, which represents 1460 offences for 2012/13. 42.6% of these offences took place during the Night Time Economy (622), with 29.9% (186) occurring between the hours of 03.00-05.59.

4.3.11 Over a third of alcohol related violence in 2012/13 took place on the Leisure Zone (38%, 555). Over half of all alcohol related violence that took place on the Leisure Zone, occurred during the Night Time Economy period (51.7%%, 287), and a high proportion within that specifically between the hours of 03.00-05.59 (32.8%, 94). Although small volumes because of how it is counted, it still represents a current issue.

**11. The NTE period accounts for a high proportion of alcohol flagged violence both for the wider Borough and particularly for the LZ area.**

**12. A third of LZ alcohol flagged violence occurs between 03.00-05.59 at weekends.**

## 5.1 Northampton General Hospital A&E Assaults Data

5.1.1 It is widely recognised only a portion of crime is reported to the police, in order to verify the findings from analysis of police recorded crime data, data relating to crime and disorder sourced from other agencies has been analysed.

5.1.2 Temporal Analysis of A&E assaults in the town centre shows a significant peak between 01:00 – 03:59 on a Friday/Saturday and 00:00 – 04:59 on a Saturday/Sunday night. This peak is also observed on a Thursday/Friday, albeit it isn't statistically significant.

**13. A&E assaults peak at weekends and in the early hours of Saturday and Sunday mornings.**



5.1.3 This peak in town centre A&E recorded assaults correlates with widespread later alcohol licensing hours in the leisure zone, during weekends. As shown 74.3% of assaults between Friday 12:00 – Sunday 11:59 occur between 00:00 – 06:00, compared to 58.1% of those occurring between Sunday 12:00 – Friday 11:59.

5.1.4 43.4% of assaults within the town centre recorded by A&E occurred between 00:00 – 06:00 on Friday/Saturday and Saturday/Sunday nights, this time period accounts for 7% of the week. Similarly, 16.8% of these assaults occurred between 03:00 – 06:00 on Friday/Saturday and Saturday/Sunday nights. This time period accounts for just 3.6% of the week.

Northampton General Hospital A&E Assaults By Time Of Day: Town Centre (NN1 Postcode)							
Hour/ Day of Assault	Mon/Tues	Tues/Weds	Weds/Thurs	Thurs/Fri	Fri/Sat	Sat/Sun	Sun/Mon
12:00 - 12:59	1	0	0	4	0	1	2
13:00 - 13:59	1	1	0	1	0	0	2
14:00 - 14:59	0	0	2	3	3	2	0
15:00 - 15:59	2	4	0	0	4	4	0
16:00 - 16:59	3	2	3	0	1	6	6
17:00 - 17:59	2	8	1	2	5	4	2
18:00 - 18:59	2	2	0	4	4	4	5
19:00 - 19:59	1	4	1	0	4	3	1
20:00 - 20:59	3	2	2	2	4	4	7
21:00 - 21:59	5	4	0	2	7	6	5
22:00 - 22:59	7	11	4	8	7	15	6
23:00 - 23:59	3	1	6	7	26	20	8
00:00 - 00:59	7	4	7	9	24	29	5
01:00 - 01:59	10	12	7	17	41	58	8
02:00 - 02:59	7	17	9	22	50	74	10
03:00 - 03:59	11	6	14	27	43	62	9
04:00 - 04:59	3	2	6	10	19	33	5
05:00 - 05:59	0	1	2	2	10	7	1
06:00 - 06:59	0	2	0	3	2	9	1
07:00 - 07:59	0	0	0	1	1	3	0
08:00 - 08:59	0	0	1	0	1	0	0
09:00 - 09:59	1	1	0	0	0	0	0
10:00 - 10:59	1	0	0	2	0	1	0
11:00 - 11:59	0	2	0	0	3	2	0

*\*There were 9 assaults recorded with fields missing for either time or day of assault, these have been discounted.*

5.1.5 Temporal Analysis of A&E assaults outside the town centre show a different picture, with peaks being less significant and slightly earlier in the night time economy. Assaults peak between 23:00 – 02:59 on a Friday/Saturday and between 19:00 – 01:59 on a Saturday/Sunday. This demonstrates the density of licensed premises selling alcohol later at night within the town centre has a clear impact upon the volume assault victims attending A&E at this time of night.



5.1.6 19.1% of assaults outside the town centre occurred between 00:00 – 06:00 on Friday/Saturday and Saturday/Sunday nights, a much lower figure compared to 43.4% within the town centre. Similarly, 4.6% of assaults outside the town centre occurred between 03:00 – 06:00 Friday/Saturday and Saturday/Sunday nights, this is much more aligned with the proportion of the week this time frame accounts for (3.6%).

Northampton General Hospital A&E Assaults By Time Of Day: Northampton (excluding NN1 Postcode)							
Hour/ Day of Assault	Mon/Tues	Tues/Weds	Weds/Thurs	Thurs/Fri	Fri/Sat	Sat/Sun	Sun/Mon
12:00 - 12:59	4	1	2	0	0	1	2
13:00 - 13:59	3	2	0	1	1	4	3
14:00 - 14:59	2	3	0	2	2	3	4
15:00 - 15:59	3	1	0	3	2	4	1
16:00 - 16:59	1	2	5	3	2	4	7
17:00 - 17:59	1	1	4	1	6	6	3
18:00 - 18:59	3	5	5	3	7	2	5
19:00 - 19:59	7	7	5	3	2	15	8
20:00 - 20:59	9	5	5	6	10	13	4
21:00 - 21:59	3	2	5	4	5	10	5
22:00 - 22:59	5	7	2	5	11	11	12
23:00 - 23:59	6	0	4	3	21	21	9
00:00 - 00:59	3	3	2	4	15	7	1
01:00 - 01:59	1	0	0	2	16	22	4
02:00 - 02:59	1	2	2	2	14	8	2
03:00 - 03:59	3	1	3	1	5	8	1
04:00 - 04:59	0	0	1	0	8	4	1
05:00 - 05:59	0	1	0	1	0	1	0
06:00 - 06:59	0	0	2	0	0	1	1
07:00 - 07:59	0	1	0	0	4	0	0
08:00 - 08:59	1	0	1	2	5	0	3
09:00 - 09:59	2	1	0	0	0	0	0
10:00 - 10:59	1	1	1	2	0	0	1
11:00 - 11:59	0	1	1	0	3	0	1

*\*There were 24 assaults recorded with fields missing for either time or day of assault, these have been discounted.*

5.1.7 As this data is self-reported by patients, the location information of the data is considered not robust enough to be included within this report. However, East Midlands Ambulance Service (EMAS) pick up information is geocoded by XY co-ordinates so provides a reliable picture of emergency health conditions by time and place across Northampton.

## 5.2 East Midlands Ambulance Service (EMAS) Pick Ups

5.2.1 EMAS pick up data both inside and outside of the leisure zone was analysed by time and location of pick up to find peak times of callouts and determine if there is any geographic correlation between call outs and licensed premises locations.

5.2.2 The following tables show the peak times for EMAS pickups categorised as Assault/Sexual Assault only, as this is the only EMAS data which illustrates crime & disorder.

5.2.3 As shown, there is a significant peak in assaults within the leisure zone between 01:00 – 04:59 on a Friday/Saturday and 00:00 – 04:59 on a Saturday/Sunday. Outside of the leisure zone this peak is slightly earlier; 23:00 – 03:59 on both Friday/Saturday and Saturday/Sunday.

EMAS Assault Pick Ups By Day & Time: Northampton Leisure Zone Only							
Hour/ Day of Assault	Mon/Tues	Tues/Weds	Weds/Thurs	Thurs/Fri	Fri/Sat	Sat/Sun	Sun/Mon
12:00 - 12:59	0	2	1	2	1	3	0
13:00 - 13:59	1	2	2	1	5	1	0
14:00 - 14:59	2	1	2	1	2	2	0
15:00 - 15:59	1	3	2	0	1	3	0
16:00 - 16:59	4	2	2	3	5	3	0
17:00 - 17:59	1	2	1	2	2	1	0
18:00 - 18:59	0	4	1	1	0	3	4
19:00 - 19:59	1	2	2	1	4	3	3
20:00 - 20:59	4	4	3	2	3	3	0
21:00 - 21:59	1	3	5	3	2	7	3
22:00 - 22:59	0	8	4	2	4	7	2
23:00 - 23:59	4	2	0	3	9	10	9
00:00 - 00:59	3	4	5	3	11	24	1
01:00 - 01:59	9	9	7	7	21	24	4
02:00 - 02:59	8	7	1	6	31	30	5
03:00 - 03:59	9	4	6	12	19	24	3
04:00 - 04:59	4	2	5	4	19	21	2
05:00 - 05:59	1	1	1	0	9	12	0
06:00 - 06:59	0	0	1	0	3	2	1
07:00 - 07:59	0	0	1	0	0	0	0
08:00 - 08:59	0	1	0	0	2	0	1
09:00 - 09:59	0	2	0	0	2	0	0
10:00 - 10:59	2	1	0	1	2	1	0
11:00 - 11:59	0	2	3	0	1	0	0




EMAS Assault Pick Ups By Day & Time: Northampton Borough (excluding Leisure Zone)							
Hour/ Day of Assault	Mon/Tues	Tues/Weds	Weds/Thurs	Thurs/Fri	Fri/Sat	Sat/Sun	Sun/Mon
12:00 - 12:59	2	2	0	2	3	1	3
13:00 - 13:59	3	5	2	2	4	6	7
14:00 - 14:59	0	6	3	2	6	4	3
15:00 - 15:59	5	4	4	6	2	8	6
16:00 - 16:59	5	12	9	10	10	8	13
17:00 - 17:59	8	4	10	5	4	8	8
18:00 - 18:59	7	6	6	5	13	9	9
19:00 - 19:59	20	5	6	6	10	13	12
20:00 - 20:59	16	7	12	13	12	14	14
21:00 - 21:59	17	8	17	9	21	14	14
22:00 - 22:59	11	16	8	9	18	14	17
23:00 - 23:59	14	9	12	11	21	23	11
00:00 - 00:59	11	6	14	9	21	28	7
01:00 - 01:59	7	7	4	7	24	21	7
02:00 - 02:59	9	2	2	3	25	27	1
03:00 - 03:59	4	5	3	5	22	24	4
04:00 - 04:59	3	2	0	0	16	18	1
05:00 - 05:59	2	0	2	2	13	8	3
06:00 - 06:59	2	3	1	2	4	10	0
07:00 - 07:59	3	1	3	3	3	10	0
08:00 - 08:59	3	1	2	1	1	5	2
09:00 - 09:59	4	6	4	4	2	3	0
10:00 - 10:59	3	0	4	2	3	5	1
11:00 - 11:59	2	4	1	3	4	1	2

5.2.4 EMAS assaults between 00:00 – 05:59 on Friday/Saturday and Saturday/Sunday within the leisure zone account for 40% of all EMAS assaults within the leisure zone, whereas assaults outside the leisure zone during this period account for 20.2% of EMAS assaults outside the leisure zone.

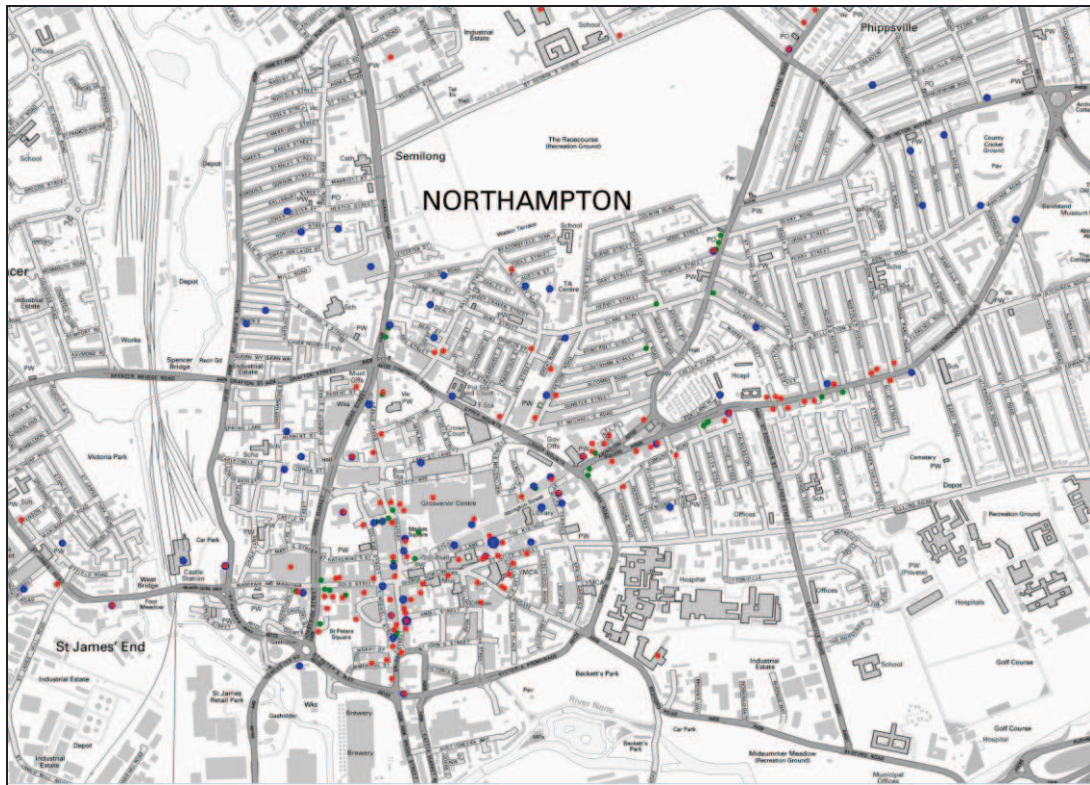
5.2.5 The maps below show the progression of EMAS attendance at assaults between 00.00 and 05.59 in relation to the location of licensed premises and late night refreshment premises. When compared with the locations of licensed premises and food outlets open at each hour, there is a clear correlation as can be seen in the maps below. As the number of premises open reduces, assaults tend to cluster around these premises and routes from premises to food outlets.

**14. EMAS assault data shows a peak on the Leisure Zone and rest of the Borough between 00.00-04.59 at weekends.**

**\*Please refer to the key below when reading the maps. Multiple pickups in the same location are illustrated by a larger point on the map**

KEY	
Licensed Alcohol Sales Premise	
Late Night Refreshment Premise	
EMAS Assault Pick Up	

**00:00 – 00:59**

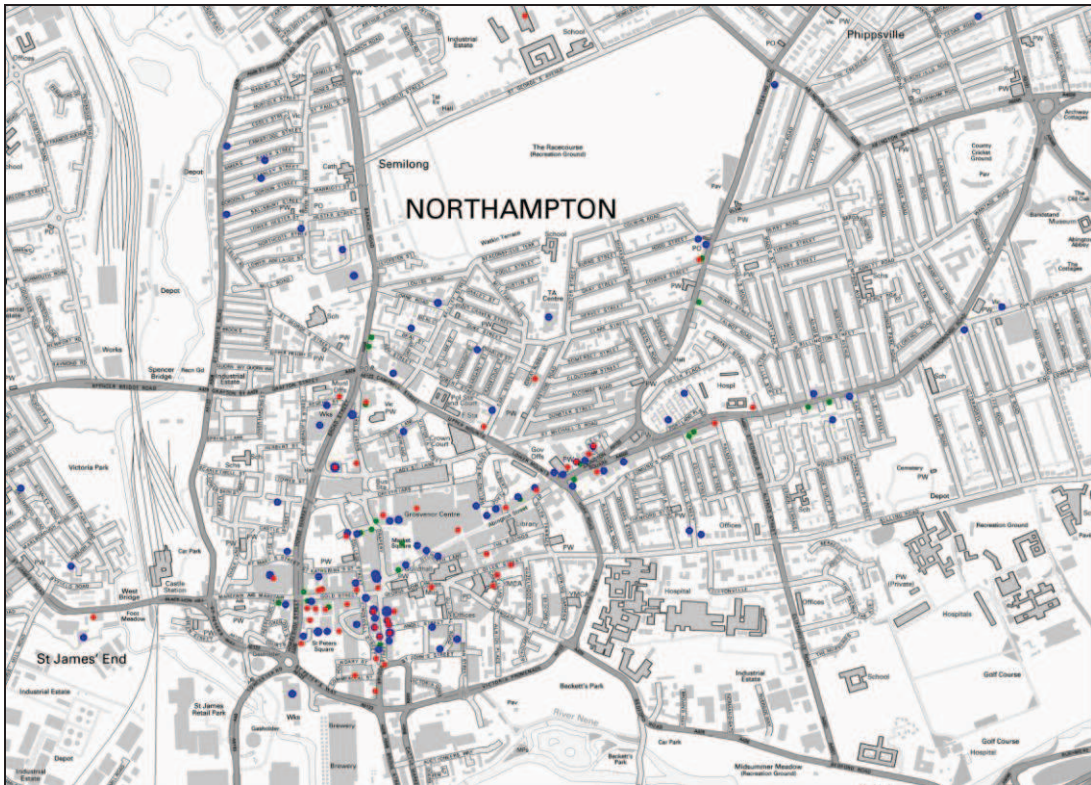


**01:00 – 01:59**

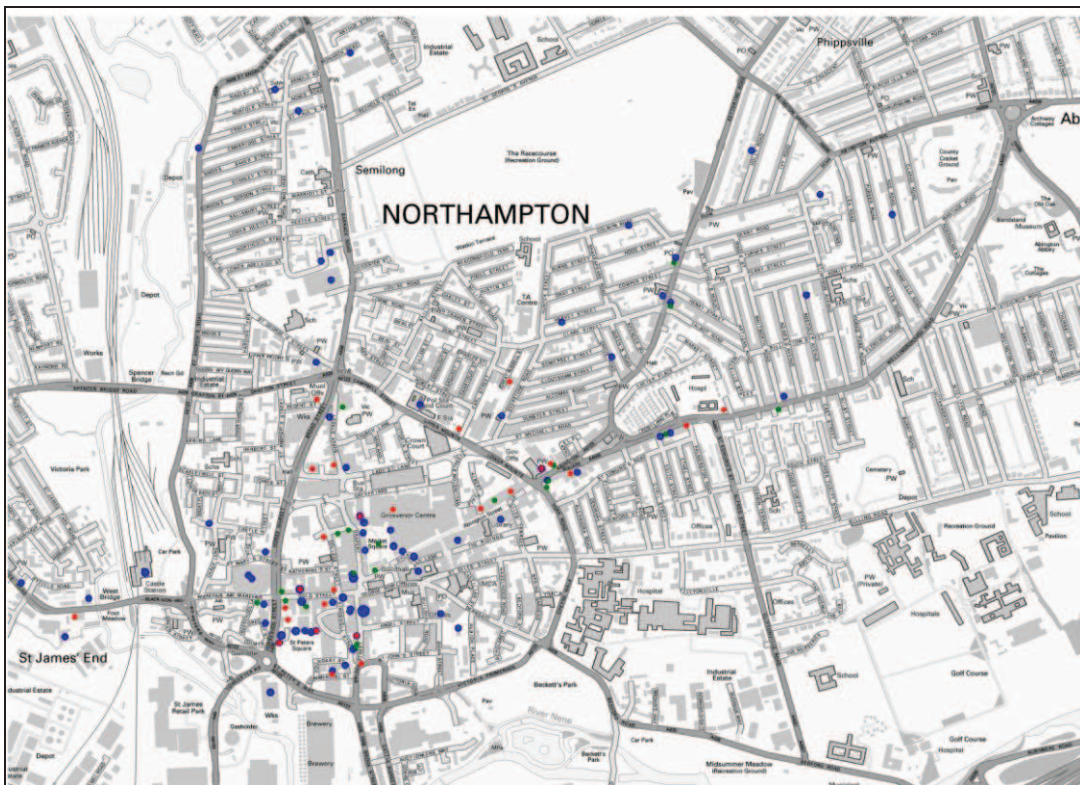




**02:00 – 02:59**

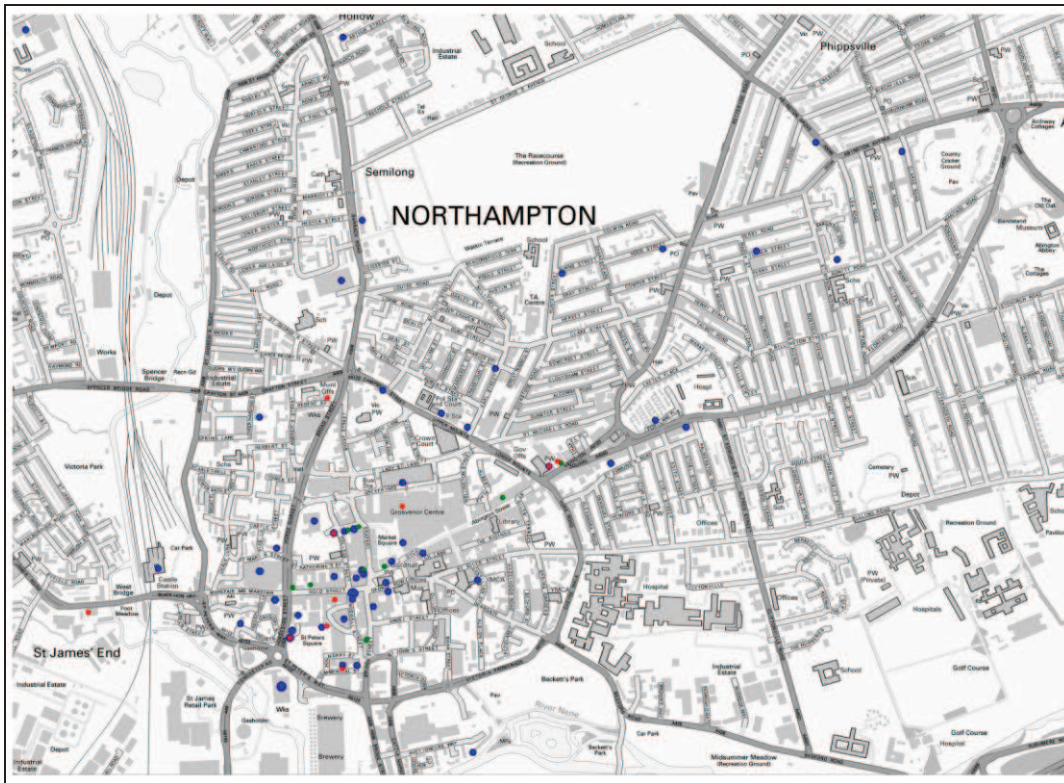


**03:00 – 03:59**

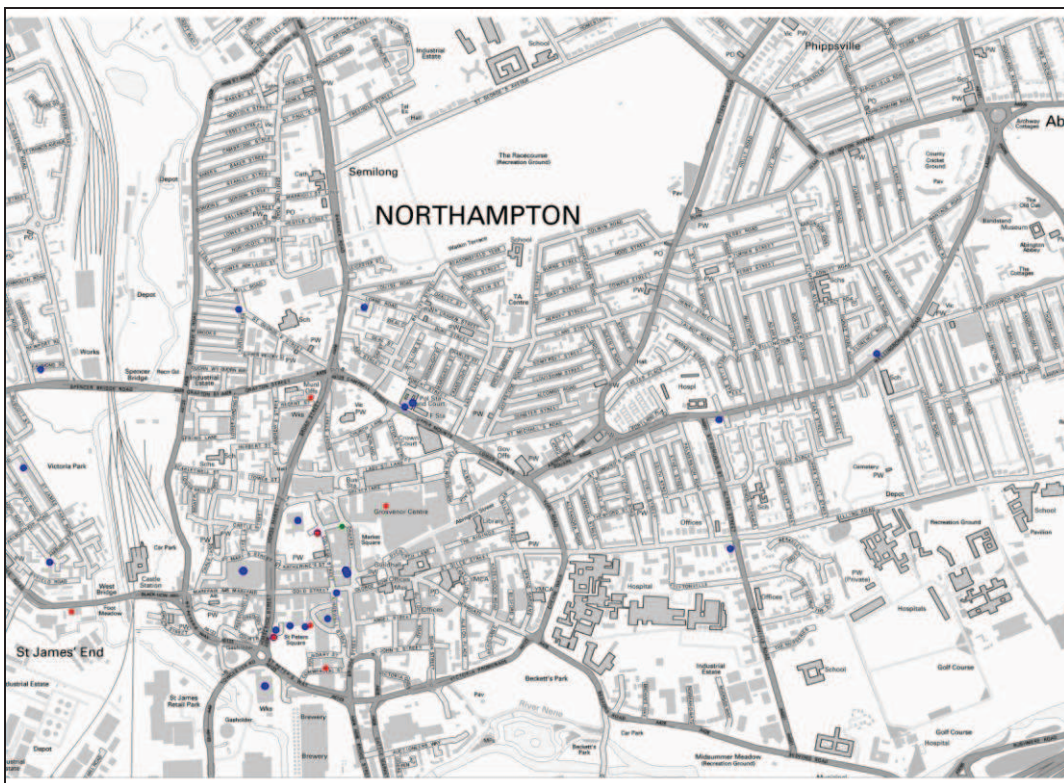




**04:00 – 04:59**



**05:00 – 05:59**



**15. Data from health partners directly relating to assaults correspond with police recorded crime. There are significantly more incidents between 00:00 – 06:00 on weekend nights, and a correlation between the location of licensed premises selling alcohol and assaults.**



## 6.1 Incident data

6.1.1 During 2012/13, 61,750 incidents were recorded for the Borough of Northampton. This comprised 21.5% (13274) Anti Social Behaviour (ASB); 24.5% (15115) Crime; 43.2% (26700) Public Safety and Welfare; 10.8% (6661) Transport.

NSIR Closing Theme	2012/13	%	2011/12	%	2010/11	%
PSW	26700	43.2%	27550	42.5%	22839	35.8%
CRIME	15115	24.5%	14944	23.0%	16895	28.1%
ASB	13274	21.5%	14971	23.1%	17907	26.5%
TRANSPORT	6661	10.8%	7388	11.4%	6082	9.5%

6.1.2 11.2% of all incidents during 2012/13 occur during NTE period. This compares with 12.3% in 2010/11. There has been a reduction of 3.1% between 2010/11 and 2012/13 for all incidents, with those occurring during the NTE period reducing by 11.2% but those occurring between 03.00-05.59 have remained unchanged. The table below shows how NTE incidents have changed over the last 3 years.

Year	Total Incidents	Within NTE	%	NTE 03:00-05:59	%
2012/13	61750	6944	11.2	1405	2.3
2011/12	64853	7916	12.2	1479	2.3
2010/11	63723	7822	12.3	1417	2.2

**16. Incident volumes occurring during 03.00-05.59 have hardly changed over the last 3 years despite a fall in those occurring during the wider NTE period and overall.**

6.1.3 The table below shows that peak times for all incidents are during the day, into the evening, specifically 15:00 – 20:00. Fridays peak extends up to 23:00

2012/13	Monday/ Tuesday	Tuesday / Wednesday	Wednesday / Thursday	Thursday/ Friday	Friday/ Saturday	Saturday/ Sunday	Sunday/ Monday
12:00-12:59	462	467	460	457	462	458	408
13:00-13:59	479	466	502	472	457	485	452
14:00-14:59	480	437	463	503	511	494	406
15:00-15:59	529	596	554	566	564	509	466
16:00-16:59	542	558	608	583	569	490	501
17:00-17:59	627	577	579	616	567	476	424
18:00-18:59	545	565	581	583	611	524	518
19:00-19:59	605	552	589	585	608	509	525
20:00-20:59	538	523	513	534	621	571	492
21:00-21:59	487	421	472	433	567	495	438
22:00-22:59	403	402	402	442	545	509	395
23:00-23:59	355	335	342	368	502	540	357
00:00-00:59	279	258	253	292	405	487	260
01:00-01:59	214	203	198	214	362	440	182
02:00-02:59	140	116	145	159	322	365	149
03:00-03:59	135	109	116	145	303	293	113
04:00-04:59	103	77	102	104	203	240	68
05:00-05:59	75	77	58	74	160	206	62
06:00-06:59	83	78	92	85	130	154	85
07:00-07:59	139	133	155	137	148	135	157
08:00-08:59	269	292	226	264	232	176	275
09:00-09:59	380	335	322	320	319	242	353
10:00-10:59	396	388	388	384	359	318	388
11:00-11:59	446	437	416	409	403	377	475

6.1.4 The Leisure Zone, contributes 15.9% of all incidents recorded; however, geographically it only represents 1.7% of the total area of Northampton Borough.

6.1.5 Temporal analysis for incidents on the Leisure Zone, indicates high volumes during daytime, predominantly between 12:00-18:00 Monday-Friday, and during the Night-time Economy, predominantly Saturday into Sunday between reducing after 05:00.

2012/13	Monday/ Tuesday	Tuesday / Wednesday	Wednesday / Thursday	Thursday/ Friday	Friday/ Saturday	Saturday/ Sunday	Sunday/ Monday
12:00-12:59	78	81	89	84	80	78	61
13:00-13:59	73	79	91	96	89	97	61
14:00-14:59	74	90	77	89	98	85	64
15:00-15:59	87	95	103	101	69	95	54
16:00-16:59	89	95	84	99	94	69	82
17:00-17:59	83	78	101	100	102	73	55
18:00-18:59	81	69	65	80	78	74	67
19:00-19:59	64	63	70	71	81	90	52
20:00-20:59	70	67	66	57	88	74	56
21:00-21:59	69	44	57	52	71	64	53
22:00-22:59	56	58	57	58	63	61	47
23:00-23:59	49	50	63	57	76	67	55
00:00-00:59	44	42	40	62	64	88	43
01:00-01:59	38	48	44	55	73	104	36
02:00-02:59	32	27	37	63	82	95	35
03:00-03:59	39	35	35	47	86	96	22
04:00-04:59	22	20	25	28	48	87	15
05:00-05:59	14	16	15	15	58	64	10
06:00-06:59	13	4	9	17	28	50	22
07:00-07:59	14	17	16	15	20	19	10
08:00-08:59	28	37	21	33	29	29	24
09:00-09:59	61	37	42	52	56	43	43
10:00-10:59	60	61	57	60	52	34	58
11:00-11:59	64	66	70	73	60	48	77

6.1.6 Anti social behaviour accounts for 21.5% of all incidents for the Borough, and 23.1% of all incidents on the leisure Zone. ASB has decreased over the last 3 years, However, it has increased within the LZ.

6.1.7 13.8% of Borough and 18% of Leisure zone ASB takes place during the NTE period.

6.1.8 Peak times for LZ ASB are Monday-Sunday, 12:00-18:00, there is also a clear block of activity on Saturday and Sunday between 00:00 and 04:59.

**17. ASB is increasing on the Leisure Zone in general, and nearly a fifth takes place during the NTE period with levels remaining high until 04.59 at weekends.**



6.1.9 When comparing Incident data on Northampton Borough compared to the LZ, "Rowdy or Inconsiderate Behaviour" has a much higher impact on the LZ, accounting for 19.3% of all incidents recorded (on LZ) compared to 9.3% of recorded incidents across the Borough

#### Incident types in Northampton Borough and the LZ (2012/13)

Northampton Borough			LZ		
NSIR Closing Theme	Count	%	NSIR Closing Theme	Count	%
Concern For Safety	9480	14.5%	Rowdy or Inconsiderate	1898	19.3%
Rowdy or Inconsiderate	8934	9.3%	Concern For Safety	1797	18.3%
Suspicious Circs	8143	8.9%	Suspicious Circs	1145	11.7%
Domestic Incident	3763	8.1%	Theft	731	7.5%
Abandoned Call	3629	4.3%	VAP	583	5.9%
Road Inc	2764	2.8%	Abandoned Call	483	4.9%
VAP	2449	2.4%	Road Inc	365	3.7%
Theft	2344	1.6%	Domestic	310	3.2%

## 7 Northampton Borough Council CCTV Control Room Incidents

- 7.1 Incidents were analysed by time and day of recording in line with other data analysed. As shown, of those incident attributed to the town centre/ leisure zone, there is high volume between 22:00 – 04:59 on Friday/Saturday and Saturday/Sunday, with significantly greater volume between the hours of 00:00 – 03:59 on Friday/ Saturday and 23:00 – 03:59 Saturday/Sunday.
- 7.2 Incident data recorded on cameras outside the leisure zone/ town centre show significantly greater volumes between 01:00 – 03:59 on Friday/Saturday and 01:00 – 04:59 on Saturday/Sunday. However, this trend is less significant than that of the leisure zone, and incidents are more evenly distributed throughout the week, showing a higher proportion of volume in the early evening than the leisure zone/town centre data does.
- 7.3 There were 164.7% (n = 2283) more incidents between 00:00 – 05:59 in the town centre/ leisure zone compare to outside this camera zone. Between 03:00 – 05:59 there were 96.9% (n = 625) more incidents between 03:00 – 05:59 in the town centre/ leisure zone compare to outside this camera zone.

**18. CCTV incidents show a peak until 04.59 at weekends in line with the peaks seen in crime, violence, incidents, EMAS and A&E data.**

NBC CCTV Public Order Incident Logs By Day & Time: Leisure Zone/ Town Centre Cameras Only							
Hour/ Day of Assault	Mon/Tues	Tues/Weds	Weds/Thurs	Thurs/Fri	Fri/Sat	Sat/Sun	Sun/Mon
12:00 - 12:59	35	34	36	30	27	27	9
13:00 - 13:59	25	29	27	20	36	41	22
14:00 - 14:59	38	22	36	24	30	43	20
15:00 - 15:59	32	30	30	31	31	44	16
16:00 - 16:59	34	36	36	30	37	45	17
17:00 - 17:59	37	24	26	30	39	46	16
18:00 - 18:59	26	19	23	28	30	32	13
19:00 - 19:59	30	32	22	20	43	45	20
20:00 - 20:59	28	19	30	42	37	44	18
21:00 - 21:59	26	14	32	20	51	74	31
22:00 - 22:59	16	22	25	33	101	129	22
23:00 - 23:59	30	18	28	42	137	195	34
00:00 - 00:59	37	37	49	65	183	268	46
01:00 - 01:59	44	55	44	78	239	344	37
02:00 - 02:59	47	58	48	102	263	313	42
03:00 - 03:59	56	81	48	106	178	287	29
04:00 - 04:59	21	14	25	32	115	131	15
05:00 - 05:59	8	3	12	9	42	50	8
06:00 - 06:59	1	5	3	1	12	23	3
07:00 - 07:59	4	4	3	4	8	5	5
08:00 - 08:59	10	7	6	12	13	10	3
09:00 - 09:59	24	8	21	24	14	4	16
10:00 - 10:59	15	28	22	19	16	3	19
11:00 - 11:59	31	27	26	20	11	7	19

NBC CCTV Public Order Incident Logs By Day & Time: Excluding Leisure Zone/ Town Centre Cameras							
Hour/ Day of Assault	Mon/Tues	Tues/Weds	Weds/Thurs	Thurs/Fri	Fri/Sat	Sat/Sun	Sun/Mon
12:00 - 12:59	10	17	14	13	14	10	15
13:00 - 13:59	21	21	21	17	17	19	9
14:00 - 14:59	33	20	17	17	19	31	31
15:00 - 15:59	24	21	20	21	36	44	33
16:00 - 16:59	28	23	26	30	27	47	21
17:00 - 17:59	27	27	33	24	23	43	22
18:00 - 18:59	34	28	23	25	35	25	21
19:00 - 19:59	49	40	47	34	36	37	25
20:00 - 20:59	40	43	50	53	41	54	31
21:00 - 21:59	29	30	30	22	49	37	18
22:00 - 22:59	29	26	29	30	46	55	22
23:00 - 23:59	12	19	24	21	44	51	15
00:00 - 00:59	17	33	23	25	49	58	21
01:00 - 01:59	13	36	22	18	74	73	12
02:00 - 02:59	14	29	19	23	64	103	15
03:00 - 03:59	22	22	20	27	85	109	18
04:00 - 04:59	13	10	14	15	58	96	11
05:00 - 05:59	15	6	11	9	34	45	5
06:00 - 06:59	2	4	3	2	26	15	3
07:00 - 07:59	5	5	2	2	6	10	3
08:00 - 08:59	7	4	4	11	6	5	3
09:00 - 09:59	8	5	7	6	10	6	4
10:00 - 10:59	13	11	5	12	10	6	10
11:00 - 11:59	13	13	9	14	4	12	10

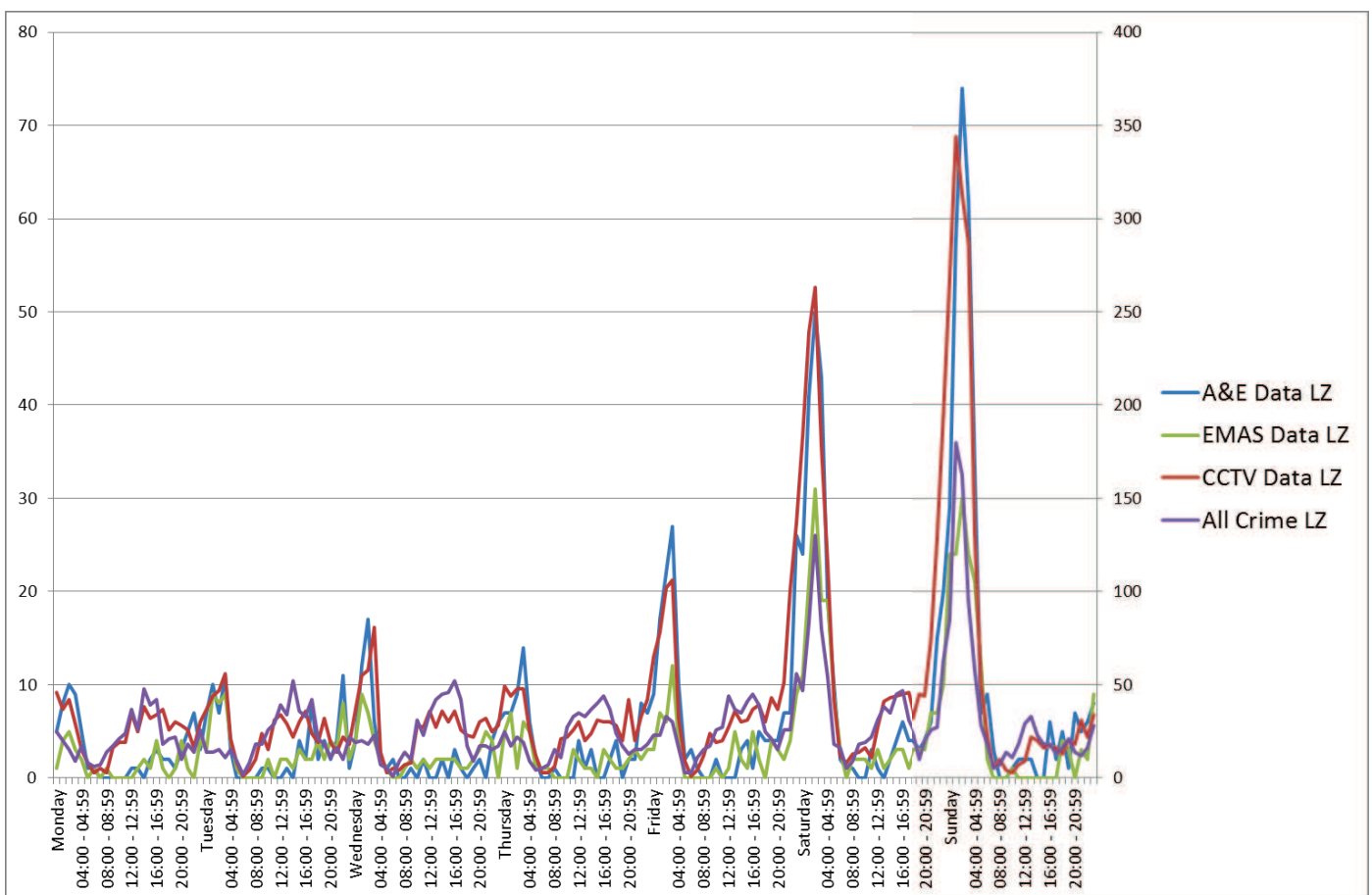
\*(List of CCTV Camera Zones excluding Leisure Zone & Town Centre: Bellinge, Blackthorn, Brackmills, Briar Hill, Duston, Goldings, Kings Heath, Kingsley Park Terrace, Kingsthorpe Shopping Centre, Lings, Mereway, NBC Car Parks, NBC Sites, Rectory Farm, Retail/ Business Parks, Sixfields, Southfields, Spring Boroughs, St James, Thorplands, UTC)

## 8 Protecting children from harm

- 8.1 Analysis of crime and incident data for under 18s has shown no issues or concerns with this age group. Only 5.1% of victims are aged 17 or under for the entire Borough, falling to 3.7% for the Leisure Zone and 0.6% on the Leisure Zone during NTE hours. The licensing objective of protecting children from harm is being achieved through existing practices by all parties.

## 9 Combined analysis

- 9.1 When all the data sets are brought together, a very interesting picture emerges. Police recorded crime, CCTV data, EMAS pick ups and A&E admissions all experience increases at similar times. There is a distinctive peak on the Leisure Zone for all the data at weekends, particularly between 21.00 and 05.59 Friday/Saturday and Saturday/Sunday. The period 03.00-05.59 although not large volume, is still notable. The chart below shows all data combined across the profile of a week.



- 9.2 It is clear from all of the data, that the NTE period as a whole, but particularly post 03.00 is a growing concern for crime, incidents, ambulance pick ups and A&E admissions. Where comparable data exists, this period of a weekend was not previously an issue, but since the licensing laws changed has become more of a concern.

**19. All agency data shows a peak at weekends 00.00-04.49 with some data extending to 05.59 at weekends**

## **10 Key Findings**

### **10.1 Is an EMRO appropriate?**

10.1.1 Violence is reducing at a slower rate than All crime and accounts for a higher proportion of all crime in recent years than it did in 2004/5.

10.1.2 The NTE period accounts for a high proportion of alcohol flagged violence both for the wider Borough and particularly for the LZ area.

10.1.3 All agency data relating to crime and disorder shows a peak at weekends 00.00-04.49 with some data showing peaks extending to 05.59.

10.1.4 ASB is increasing on the Leisure Zone in general, and nearly a fifth takes place during the NTE period with levels remaining high until 04.59 at weekends

10.1.5 CCTV incidents show a peak until 04.59 at weekends in line with the peaks seen in crime, violence, incidents, EMAS and A&E data.

### **10.2 Where is it appropriate?**

10.2.1 The leisure zone area, and the NTE period specifically account for a disproportionate amount of crime within Northampton Borough.

10.2.2 Crime on the leisure zone has fallen at a slower rate when compared with the rest of Northampton.

10.2.3 Where alcohol has been identified as a factor for the offender, the majority are violence against the person, and a large proportion occurs within the Leisure Zone and NTE period.

10.2.4 Within the leisure zone, there is clear a correlation between the location of licensed premises selling alcohol at a specific time of night and assaults recorded by police and ambulance services at that time. This correlation is not evident across the rest of the borough so crimes cannot be attributed to alcohol licensing for the whole borough.

10.2.5 There is a concentration of violence after 02.00 within a specific area of the leisure Zone, in close proximity to open licensed premises, and a disproportionate amount of violence 03.00-05.59 in the same area.

10.2.6 Data from health partners directly relating to assaults correspond with police recorded crime. Showing significantly more incidents between 00:00 – 04:59 on weekend nights in the leisure zone than any other time of the week. The peak is outside of the leisure zone tends to be earlier than this, with volume reducing around 02:59 - 03:59.

### **10.3 What time is appropriate?**

10.3.1 Violent crime in Northampton peaks between 01:00 – 03:00, although the peak has extended later into the night since 2004-05.

10.3.2 Crime occurring on the leisure zone between 03.00-05.59 Saturday and Sunday mornings is increasing in volume and proportion terms. The public are subject to more crime and disorder during this time than they have in the past, thus not meeting the licensing objective of protecting people from crime and disorder.

- 10.3.3 Violence on the Leisure Zone between 03.00-05.59 has increased by 107% between 2004/5 and 2012/13. There has been a 26% increase in violence between 02:00 – 05:59 in the leisure zone when comparing the same periods.
- 10.3.4 The increase in violent crime between 03:00 – 06:00 on Saturday and Sundays only is 91%, slightly less than the overall week.
- 10.3.5 Incident volumes occurring during 03.00-05.59 have hardly changed over the last 3 years despite a fall in those occurring during the wider NTE period and overall
- 10.3.6 When comparing 2004-5 and 2012-13, every day of the week has had an increase in violent crime in the leisure zone between 03:00 – 06:00, excluding Thursdays, which had 1 less crime.
- 10.3.7 Data from health partners directly relating to assaults correspond with police recorded crime. Showing significantly more incidents between 00:00 – 04:59 on weekend nights in the leisure zone than any other time of the week. The peak is outside of the leisure zone tends to be earlier than this, with volume reducing around 02:59 - 03:59.
- 10.3.8 Given the high concentration of crime and incidents within the Leisure Zone, the fact that crime and incident patterns and trends have not mirrored what has happened elsewhere on Northampton Borough, and that the NTE period and specifically after 03.00 is growing, it is important for all agencies to target this area and time period to ensure the licensing objectives are met.



Locality Data Breakdown

CDRP	Higher Risk Drinkers	NHS	Crime	Workforce and Wider Economy	Social Services	Total
Northamptonshire	100%	£37,808,837	£30,571,587	£36,158,132	£34,446,180	£138,984,736
Corby	8.3%	£3,127,198	£2,528,600	£2,990,667	£2,849,070	£11,495,536
Daventry	11.6%	£4,390,183	£3,549,828	£4,198,511	£3,999,727	£16,138,249
East Northants	12.9%	£4,863,298	£3,932,380	£4,650,970	£4,430,764	£17,877,412
Kettering	12.8%	£4,823,956	£3,900,569	£4,613,345	£4,394,921	£17,732,791
Northamptonshire	31.6%	£11,943,880	£9,657,620	£11,422,420	£10,881,611	£43,905,530
South Northants	12.3%	£4,640,359	£3,752,116	£4,437,764	£4,227,653	£17,057,892
Wellingborough	10.6%	£4,019,963	£3,250,474	£3,844,455	£3,662,434	£14,777,326

Table 5: Total Cost Breakdown by higher risk drinkers proportion

CDRP	Higher Risk Drinkers	Hospital Admissions	Outpatient Visits	A&E Attendance	Ambulance Journeys	GP Consultations	Practice Nurse Consultations	Specialist Treatment Services	Other Costs
Northamptonshire	100%	£2,001,510	£6,438,577	£5,849,206	£19,862,871	£1,975,065	£263,418	£749,070	£669,120
Corby	8.3%	£165,546	£532,540	£483,792	£1,642,874	£163,359	£21,788	£61,956	£55,343
Daventry	11.6%	£232,406	£747,617	£679,182	£2,306,382	£229,335	£30,587	£86,978	£77,695
East Northants	12.9%	£257,451	£828,185	£752,375	£2,554,933	£254,050	£33,883	£96,352	£86,068
Kettering	12.8%	£255,369	£821,485	£746,289	£2,534,265	£251,995	£33,609	£95,572	£85,372
Northampton	31.6%	£632,281	£2,033,958	£1,847,775	£6,274,717	£623,927	£83,214	£236,633	£211,376
South Northants	12.3%	£245,650	£790,220	£717,885	£2,437,812	£242,404	£32,330	£91,935	£82,123
Wellingborough	10.6%	£212,807	£684,571	£621,907	£2,111,887	£209,996	£28,007	£79,644	£71,143

Table 6: NHS CDRP Breakdown by higher risk drinkers proportion

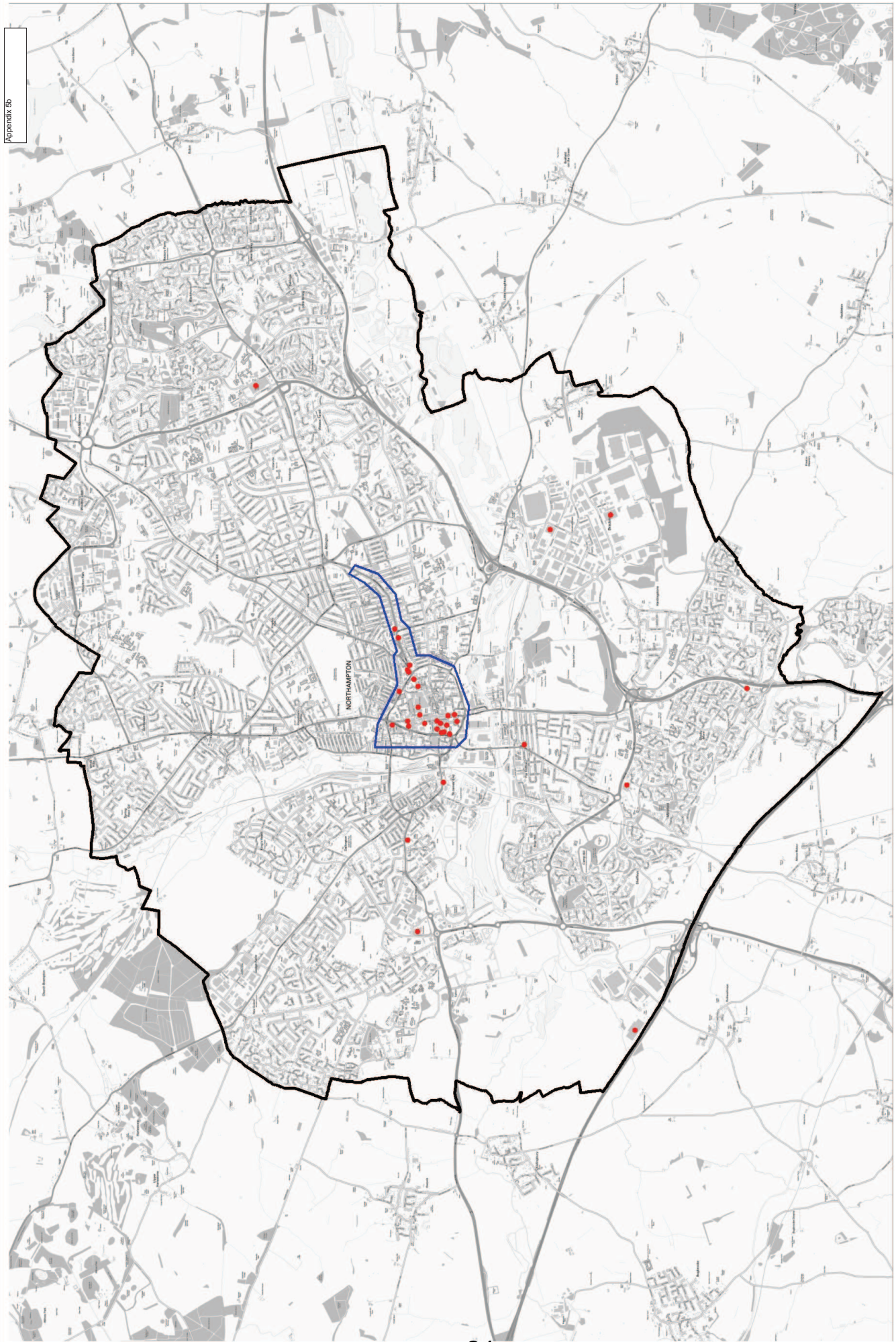
	Total cost of offences		East		South		Wellington			
	Corby	Daventry	Northants	Kettering	Northampton	Northants	Wellington			
Violence against the person	£17,565,765	£1,528,222	£2,037,629	9	£2,265,984	£2,248,418	8	£5,550,782	£2,160,589	£1,861,971
Sexual offences	£4,626,279	£402,486	£536,648		£596,790	£592,164		£1,461,904	£569,032	£490,386
Common Assault	£1,006,972	£87,607	£116,809		£129,899	£128,892		£318,203	£123,858	£106,739
Robbery	£242,247	£21,075	£28,101		£31,250	£31,008		£76,550	£29,796	£25,678
Burglary (in a dwelling)	£508,218	£44,215	£58,953		£65,560	£65,052		£160,597	£62,511	£53,871
Theft	£96,496	£8,395	£11,194		£12,448	£12,351		£30,493	£11,869	£10,229
Theft of a pedal cycle	£40,520	£3,525	£4,700		£5,227	£5,187		£12,804	£4,984	£4,295
Theft of a vehicle	£557,445	£48,498	£64,664		£71,910	£71,353		£176,153	£68,566	£59,089
Theft from a vehicle	£190,300	£16,566	£22,075		£24,549	£24,358		£60,135	£23,407	£20,172
Attempted vehicle theft	£16,362	£1,424	£1,898		£2,111	£2,094		£5,171	£2,013	£1,734
Criminal damage	£2,329,326	£202,651	£270,202		£300,483	£298,154		£736,067	£286,507	£246,909
Robbery of a business property	£29,950	£2,486	£3,474		£3,864	£3,834		£9,464	£3,684	£3,175
Burglary (not in a dwelling)	£654,426	£54,317	£75,913		£84,421	£83,767		£206,799	£80,494	£69,369
Theft from a shop	£28,345	£2,353	£3,288		£3,657	£3,628		£8,957	£3,486	£3,005
Fraud and forgery	£79,585	£6,606	£9,232		£10,267	£10,187		£25,149	£9,789	£8,436

Table 7: Crime Costs Breakdown by higher risk drinkers proportion

LICENSED PREMISES INSIDE LEISURE ZONE SELLING ALCOHOL POST 03:00					
(note this does not include recent changes to licence authorisations)					
NAME	STREET	POSTCODE	PREMISES TYPE	LAST SALE OF ALC	
Ambassade Nightclub & Bar	Abington Square	NN1 4AE	Pubs, Clubs & Bars	04:30	
Aspers Casino	Commercial Street	NN1 1PJ	Others	24hour	
Atmosphere	Adelaide Place	NN1 1AJ	Pubs, Clubs & Bars	04:00	
Balestra	The Parade	NN1 2EA	Pubs, Clubs & Bars	04:00	
Bantam Cock PH	Abington Square	NN1 4AE	Pubs, Clubs & Bars	05:00	
Club Base	Gas Street	NN1 1PY	Pubs, Clubs & Bars	06:00	
Club Fever	Horseshoe Street	NN1 1TB	Pubs, Clubs & Bars	04:00	
Fiddlers PH	Wellingborough Road	NN1 4DR	Pubs, Clubs & Bars	04:00	
Fuse	Wellingborough Road	NN1 4DX	Pubs, Clubs & Bars	03:30	
Gala Casino Regent Street	Regent Street	NN1 2LA	Others	06:00	
Level 4	Sheep Street	NN1 2NE	Pubs, Clubs & Bars	04:00	
Lost	St Peters Square	NN1 1PS	Pubs, Clubs & Bars	05:30	
Millennium Fast Food	Gold Street	NN1 1RS	Takeaways	04:00	
MoMo	Abington Street	NN1 2EH	Pubs, Clubs & Bars	04:00	
Motion	Albert Place	NN1 2BQ	Pubs, Clubs & Bars	04:00	
Pepe's Piri Piri	Gold Street	NN1 1RA	Takeaways	05:00	
Rahuls	Bridge Street	NN1 1NS	Hotels, B&B's & Restaurants	04:00	
Revolution	Bridge Street	NN1 1PA	Pubs, Clubs & Bars	04:00	
Sainsburys Supermarket	Princes Walk	NN1 2EL	Supermarkets, Shops & Off Licences	24hours	
Thali/Fuse	Wellingborough Road	NN1 4DX	Hotels, B&B's & Restaurants	03:30	
The Academy	Gold Street	NN1 1RS	Pubs, Clubs & Bars	04:00	
The Boston Clipper PH	College Street	NN1 2QP	Pubs, Clubs & Bars	05:30	
The Charles Bradlaugh PH	Upper Mounts	NN1 3DN	Pubs, Clubs & Bars	04:00	
The Roadmender Club	Ladys Lane	NN1 3AH	Pubs, Clubs & Bars	04:00	
Urban Tiger	Abington Square	NN1 4AA	Pubs, Clubs & Bars	04:00	



LICENSED PREMISES OUTSIDE LEISURE ZONE SELLING ALCOHOL POST 03:00					
(note this does not include recent changes to licence authorisations)					
NAME	STREET	POST CODE	PREMISES TYPE	LAST SALE OF ALC	
Beacon Bingo	Weedon Road	NN5 5BG	Others	06:00	
Carlsberg Distribution Centre	Tithe Barn Way	NN4 9BA	Others	24hours	
Hampton Gate Tesco Distribution Centre	Caswell Road	NN4 7PW	Supermarkets, Shops & Off Licences	24hours	
Harvey Nicholls Distribution	Liliput Road	NN4 7DT	Others	24hours	
Sainsburys Superstore	Gambrel Road	NN5 5DG	Supermarkets, Shops & Off Licences	24hours	
Shell	London Road	NN4 8AJ	Supermarkets, Shops & Off Licences	24hours	
Shell Far Cotton	Towcester Road	NN4 8LA	Supermarkets, Shops & Off Licences	24hours	
Spar	St James Road	NN5 5HS	Supermarkets, Shops & Off Licences	24hours	
Tesco Extra Weston Favell	Billing Brook Road	NN3 8JZ	Supermarkets, Shops & Off Licences	24hour	
Tesco Superstore Hunsbury Centre	Clannell Road	NN4 8BE	Supermarkets, Shops & Off Licences	24hour	



Title

# Licensed Premises Selling Alcohol Post 03:00

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Name: W Finn

Date: 6th June 2013

Scale: 1:64500

Dept: Community Safety

Project: EMRO





**APPENDIX 6**  
Informal Consultation Information Letters Sent

<u>Name of organisation</u>	<u>Date sent</u>	<u>Response returned</u>
Responsible Authorities	28/02/2013	9
Hackney Drivers	28/02/2013	155
Private Hire operators	28/02/2013	50
University	28/02/2013	1
BID	28/02/2013	1
Pubwatch	28/02/2013	1
Churches	28/02/2013	52
Mosques	04/03/2013	4
Street Pastors	05/03/2013	1
CRI	04/03/2013	1
Hope	05/03/2013	1
Voluntary Organisations	04/03/2013	15
Residents Associations	04/03/2013	10
Parish Councils	28/02/2013	7
Larger Hotels	04/03/2013	7
Licencees	04/03/2013	650
Solicitors	01/03/2013	47
GPs	28/02/2013	25

APPENDIX 6

Views on principle of EMRO	Organisation Type	Comments
For	Person	Times
For	Church	
For	Person	
Against	Casino	Unfair to licensed premises who operate safe, secure and well managed premises; threat to late night economy; detrimental to business and could lead to loss of employment and revenue to treasury
For	Licensee	Times; better use of police resources; "bars and clubs will be on level playing field"
Against	Licensee	incidents at house parties; rekindle rave parties; displacement "it is likely that drinkers would start drinking in other towns"; loss of business rates revenue; should adopt zero tolerance approach; financial impact on licensees
Against	Person	damage town economy; businesses will close; need tougher sentencing
For	Residents Assoc.	
For	Parish Council	
Against	Solicitors	loss of jobs; premises will close; discourage university students; loss of revenue in the town; displacement of drinkers to elsewhere; loss of jobs will impact on welfare of children
Neutral	Licensee	
For	Person	Times
For	Person	"Positives far outweigh negatives"; Better use of police resources
For	Person	
For	Person	"will be in the interest of public safety and the crime and disorder problems this town is being tarnished with"
For	Person	will protect young people from harm
Against	Licensee	
For	Store	reduce public nuisance on abington street

Against	Casino	A blunt instrument; "A balance must be sought to ensure that only those implicated in contributing to the problem are the recipients of restrictions in the trade"
For	Private Hire	
Against	hotel	Times unable to compete; loss of business
For	Residents Assoc.	
Against	Solicitors	
? Arguments	Licensee	Times "severe impact on local nighttime economy"
Against	Licensee	discourage students; discourage investment in town; increase anti-social behaviour;
Against	Owners	create flashpoints; difficult to attract new tenants; to business units
Against	Person	Cause more crime as "nothing for people my age to do"; destroy families as no income
For	Person	improve safety and crime and disorder in the town centre
Against	Licensee	displacement to Milton Keynes; will kill nightlife trade
Neutral	Licensee	
For	Residents Assoc.	
For	Licensee	
For	Church	
Against	Person	promote 4 licensing objectives ruining businesses in town; encourage people to drink on streets; job losses; need better patrols in town centre
For	Doctors	help prevent crime and disorder; improve public safety; prevention public nuisance; protection of children from harm
Against	Students' Union	Have Best Bar None; committed to security; no problems in their bar; EMRO indiscriminate punishment for responsible organisation; suggest responsible drink campaign
Against	Solicitors	
Against	Licensee	Times; staggered closing; drinking up time; bottle neck; shorter drinking time for same amount of alcohol; problem shifting to another area; enforcement. "Serious implications for many licenced businesses, including those which are well run...Unclear that EMROs will ameliorate problems.."
Against	Licensee	loss of jobs; create empty town centre premises; displacement to neighbouring town

Against	Taxi Driver	People generally well behaved. Congestion and Building work in Bridge Street is a worse issue.
Against	Person	People who can only get out late wont be able to enjoy themselves
For	Person	But only in Bridge Street area
For	Person	Protect young people from short and long term harm
For	Person	Too much police resources being wasted under present system



**Far Cotton Working Men's Club**  
**Main Road**  
**Far Cotton**  
**Northampton**  
**NN4 8EN**

The Licensing Department  
Northampton Brough Council  
The Guildhall  
St Giles Square  
Northampton  
NN1 1DE

Dear Sir or Madam

I write in response with regards to the notification of the implementing an Early Morning Restriction Order. The Club site is situated within an industrial estate where there are just a few houses near by at the end of the road. As a Club we ask that our members leave the premises in an orderly fashion and as quietly as possible. The only occasion that this may not happen is New Years Eve.

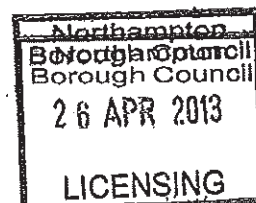
Please accept my apologies in not making contact sooner.

Yours Faithfully



Secretary

Far Cotton Working Men's Club.





**Louise Faulkner**

03 March 2013 14:30

**From:**

**Sent:**

**To:**

**Subject:**

03 March 2013 14:30

Licensing

[Suspected SPAM] I would like to offer my support for an EMRO to be implemented through out the whole of northampton/norhamptonshire as soon as possible with a midweek restriction of the sale of alcohol at 01.00 and a weekend restriction at 03.00 I s...

03 March 2013

**Bill Edwards**

---

**From:** [REDACTED]  
**Sent:** 06 April 2013 14:19  
**To:** Licensing  
**Subject:** EMRO consultation

If this order comes into effect surely it will massively reduce the income of the town's establishments which will eventually mean the closure of many and will damage the town's economy.

Establishments will simply be unable to meet overheads and will be forced to close or raise entry/drink prices which will in-turn deter customers and eventually lead to closure.

Or they might opt to provide more offers to offset this and this will cause people to drink more but in a shorter space of time, which will exacerbate the problems seen with drinking.

One of the best things Northampton has to offer is a large variety of pubs, bars and clubs and is popular with people in surrounding towns/cities, as well as inhabitants of Northampton.

Whilst I recognise that alcohol causes a lot of problems in the town (I have been a victim myself) I feel you should be focusing your efforts on combating street drinkers rather than targeting paying punters that are keeping Northampton's night time economy alive.

People convicted of alcohol fuelled/related crimes need tougher sentencing to make people think twice and send a clear message that it will not be tolerated. Everyone else that doesn't cause trouble shouldn't need to be penalised because of others.

My main concern is that there will be more closures and Northampton's economy will plummet further. I really want to see Northampton do well and as the nightlife here is one of the best things about the town, I think we should be using this to encourage visitors and investment rather than curbing it with these silly, short-sighted orders.

People that cause problems when drinking won't change, it will just mean the time limit in which they get drunk to their eyeballs and cause chaos will shorten which could end up making the problem worse.

**Louise Faulkner**

---

**From:** [REDACTED]  
**Sent:** 20 March 2013 18:39  
**To:** Licensing  
**Subject:** Feedback

Dear Sirs

I have read the proposal that premises will not be able to sell alcohol between midnight and 6am. I am really disappointed by this. Over recent years Northampton has become less appealing to the younger generation. Milton Keynes who have a better shopping area, restaurants and leisure activities has continued to offer more for the younger generation which is right on our doorstep.

I do not believe that closing premises will tackle the problem. It will cause the closure of the few good bars in Northampton that are available to responsible adults who enjoy being out with friends. It will not stop the small minority of people who abuse alcohol. In fact I think it will increase the problem. At present people who are out in town at present slowly start leaving bars from 11.30pm until closing time. Under the present proposal everybody who is out in town to be out in the streets from midnight causing further problem for the police.

I personally think this will also have a negative impact on the university also. At present there is a lot of competition amongst universities and I believe that potential students will be put off by the town with this proposal as they the social element is important to students.

Over recent months I have seen lots of marketing about northampton alive unfortunately this does not seem to be the case northampton in closed.

I do hope this proposal is reconsidered.

Kindest regards

[REDACTED]



Louise Faulkner

---

From: [REDACTED]  
Sent: 20 March 2013 18:58  
To: Licensing  
Subject: Emro

Hello

I would like to put forward my opinion on the proposed changes to the licensing hours for the town centre. I support the plan - whilst it will have a negative effect on the club businesses (primarily Bridge St) of northampton i believe the positives will far outweigh the negatives. The time wasted by our police force continually having to have a presence in the town with riot vans and multiple squad cars, on a Friday/Saturday night is unbelievable, perhaps their time could be spent on more productive activities such as policing local neighbourhoods to reduce crime there. There is also the strain put on the local ambulance service and the nurses/doctors at Northampton general, whilst people will still find places to "overdrink" in the numbers will be far less and there wouldn't be such a strain on the already limited resources of our hospital and paramedics.

Regards

**Louise Faulkner**

---

**From:** [REDACTED]  
**Sent:** 20 March 2013 20:15  
**To:** Licensing  
**Subject:** Restrictions for alcohol licensing

To whom it may concern,

Whilst I appreciate the intention of this proposal is to make Northampton a better place to live and enjoy, I do not feel that imposing the ban will bring the desired affect.  
It is my view that it will not only shift the problem to pre-midnight hours but also has the potential to make matters worse with those wishing to over-do it cramming in more alcohol as they know they won't get any after midnight.

Northampton's nightlife is hardly the bustling metropolis of New York but the clubs and bars provide jobs and income to our town. As well as a place to go for fun.

The establishments in the town centre are responsible and have in my view always dealt with situations fairly and swiftly. As well as this, it has been my experience that the people causing a problem are in the minority and on the whole Northampton is a safe and good night out. Lets face it, it's hardly Brixton or some dodgy city centre you see on cop shows.

So I implore you not to punish bars and clubs and those that drink and behave responsibly but rather look at other ways to manage those that choose not to. Prohibition didn't work in 1930 and I feel neither will this action. It'll make it a whole lot worse.

Please consider any actions very carefully.

Kind regards,

**Louise Faulkner**

---

**From:** [REDACTED]  
**Sent:** 20 March 2013 22:03  
**To:** Licensing  
**Subject:** Restrictions on licensing

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Dear Sir/Madam

I am writing with regards to the planned restrictions to sale of alcohol from midnight to 6am. This is an over reaction to a minor issue of a small number of drunk people.

As someone in my 30's who enjoys a Friday or Saturday night out once or twice a month either out for drinks or for a meal with my husband or friends I am appalled that the council & police think its a good idea to stop successful businesses trading after midnight. When you are enjoying yourself as an adult you do not need the Nanny council & police telling you to go home just because a small number of people go a bit too far. We live in a free country where i have the right to continue drinking alcohol until one of these locations closes, normally 2am. Pubs, bars, restaurants & clubs will go out of business & will put many hundreds of employees out of work, and associated suppliers will also suffer. These business owners & employees will be unemployed & will be claiming benefits thus increasing the number of unemployed up & be a greater strain on the tax payer.

Lastly this will be the death of Northampton with more boarded up units, thus attracting less people to a town that is already struggling in the current economic climate. You will drive people to go to neighbouring towns taking their money with them.

By all means don't give licences to open past 2 or 3 am & continue the good work the police are doing on a weekend. I have noticed a drop in extreme drunken behaviour since the licensing was brought in. Please don't treat the residents & bar, pub, club & restaurant owners of Northampton like children by imposing a ban.

Yours sincerely

[REDACTED]

Sent from Galaxy S3 on Three

**Louise Faulkner**

---

**From:** [redacted]  
**Sent:** 20 March 2013 20:35  
**To:** Licensing  
**Subject:** Proposal to end post midnight alcohol sales- Residents opinion

To whom it may concern,

I've read with increasing dismay the proposal that has been put forward to end alcohol sales after midnight in Northampton town centre. This is the first time I've felt the need to contact the council on any issues but as a council tax payer I feel the need to air my views.

I, as with the large majority of town residents, am a casual drinker who enjoys going out into the town centre every now and then for a night out. Like the large majority, I am always well behaved, abhorre trouble and violence and am genuinely only interested in having a good time with friends. My nights out never end before midnight.

I find it so narrow minded and short sighted that such measures can so forcefully be brought forward which will punish the large majority of town centre visitors because of the actions of such a small contingent. It is ridiculous to think that this will have any real impact on the issues of binge drinking and anti social behaviour. The same people you are trying to combat by introducing such measures are the exact same people who will merely by even cheaper alcohol from off licenses and then drink on street corners instead.

As for myself, I am, like the large majority, fairly affluent and mobile and therefore this measure will affect me in only one way- I will no longer go out in Northampton but will travel to other towns and cities which dont have such stupid, short sighted and draconian measures in place. I will spend my hard earned money elsewhere as Northampton centre dies a slow and painful death.

The actions of the council have already seen the town centre high street die....have you seen the number of empty shops? Why are you so hell bent on destroying the night time economy too? These are peoples jobs and livelihoods that you are basically nailing the coffins on.

Ultimately, if this is a matter you seriously expect to enforce, you will not be able to do so without popular opinion. You also know that if you were to put this to a popular vote, there is no chance it would be carried, so why would you put it into practise anyway?

Yours sincerely,

[redacted signature]

-----Original Message-----

From: [REDACTED]  
Sent: 04 March 2013 15:03  
To: Licensing [REDACTED]  
Subject: EMRO consultation

Please don't waste scarce resources on this consultation.

Just go ahead and do it!

Yours sincerely,

-----Original Message-----

From: [REDACTED]  
Sent: 04 March 2013 22:30  
To: Licensing  
Subject: Proposed changes to licensing hours, comment from [REDACTED]

Hello,

We think that the problem is partly that people are getting pre-loaded at home or on cans of beer bought in supermarkets and shops.

---

Maybe the pubs could be a source of stability, if the landlords were brought into a scheme where they would really bear down on people who were drunk early in the evening?  
Could the 'good' co-operative pubs be rewarded in some way?

The bye-law that prohibits drinking in the street is not observed. We understand that the police view is that if they tried to implement it the cells would soon be full and all the available police would be inside the station taking down particulars. Couldn't there be a well advertised campaign, using the local radio and paper, and make an example of one or two people who would be charged and fined and that would be made public in the media.

Regards,



**From:** [REDACTED]  
**Sent:** 30 April 2013 08:56  
**To:** Phillip Bayliss  
**Subject:** EMRO

Dear Mr. Bayliss,

I write to support the idea of restricting drinking hours. I am particularly in favour of shutting the town centre pubs and clubs at Midnight on Friday and Saturday nights. I feel we should

protect particularly the young people from themselves and from harm that may have long term consequences.

---

**From:** [REDACTED]  
**Sent:** 12 March 2013 13:54  
**To:** Licensing  
**Subject:** EMRO views

I saw the article in last week's Herald requesting views on drinking hours in Northampton.

I would like these imposed in the Bridge Street area of Northampton, which thanks to large numbers of people binge drinking has now become a no-go area at night.

My son is in his teens and will soon be starting to go out into town at night. I worry for his safety and think that EMROs in that area would have a huge impact on improved safety and reduced crime in the town centre.

**Philip Bayliss**

---

**From:** Philip Bayliss  
**Sent:** 18 March 2013 23:56  
**To:** Licensing  
**Subject:** Early closure of licenced premises

To whom it may concern,

I have just seen information with regards to the idea of banning licenced premises from serving alcohol in the town centre between the hours of 12am-6am.

For my personal situation this seems ridiculous and it will strip the right I have of a night off from responsibilities and my 24/7 job.

I am a full time farmer and mother of 2 young boys. My business is my own and I work 7 days a week running my farm, delivering orders etc.. My only time off is a night out in Northampton town centre, where I enjoy music and a few alcoholic drinks until the early hours. Because of my work and children I do not get into the town centre until around 1030pm.

So if this idea of a drink free time came into force it would take away my right of enjoying myself. I'm sure I would not be the only one who would lose that right.

Years ago before I moved out of town I used to work in the nightclub industry and I do understand the problems there are in the town with alcoholism violence and other antisocial issues. But this isn't going to be the answer.

Yours faithfully

**Louise Faulkner**

---

**From:** Louise Faulkner  
**Sent:** 20 March 2013 18:58  
**To:** Licensing  
**Subject:** Emro

Hello

I would like to put forward my opinion on the proposed changes to the licensing hours for the town centre. I support the plan - whilst it will have a negative effect on the club businesses (primarily Bridge St) of Northampton I believe the positives will far outweigh the negatives. The time wasted by our police force continually having to have a presence in the town with riot vans and multiple squad cars, on a Friday/Saturday night is unbelievable, perhaps their time could be spent on more productive activities such as policing local neighbourhoods to reduce crime there. There is also the strain put on the local ambulance service and the nurses/doctors at Northampton general, whilst people will still find places to "overdrink" in the numbers will be far less and there wouldn't be such a strain on the already limited resources of our hospital and paramedics.

Regards

From: Facebook  
Sent: 12 April 2013 11:01  
To: communications  
Subject:

commented on Northampton Borough Council's link.

facebook



commented on  
**Northampton Borough Council's link.**

Simon wrote: "please pass this on why we have the chance to SAY NO <http://www.notoemro.co.uk/> Council and police are proposing a possible 12pm EMRO across the shire,s for the sale of Alcohol this will defiantly CLOSE us down even a reduced licensing time 2am or 3am will have a massive impact on the town and clubbers would I believe travel to mlton keynes Instead.. thos Killing our nightlife trade just like our shopping trade.. this will then spiral down to others food shops, taxi's, hair dressers & cloths shops as maybe once a month partying or house party's are the only alternative!"

Reply to this email to comment on this link.

[See Comment](#)

This message was sent to [publicrelations@northampton.gov.uk](mailto:publicrelations@northampton.gov.uk). If you don't want to receive these emails from Facebook in the future, please unsubscribe.  
Facebook, Inc., Attention: Department 415, PO Box 10005, Palo Alto, CA 94303

Phillip Bayliss

---

**From:** NorthamptonSM <Northampton.SM@marks-and-spencer.com>  
**Sent:** 06 March 2013 12:51  
**To:** Licensing  
**Subject:** EMRO

Good afternoon.

The proposal for an EMRO covering hours between 12 midnight and 06.00am is one that I support. It will not affect our trade and should reduce some of the issues around public nuisance that can impact us as a business on Abington Street.

Kind Regards

Phillip Bayliss Store Manager  
Marks & Spencer Northampton  
☎ 07585126276 | 7611 ex. 3400 |  
✉ [northampton.sm@marksandspencer.com](mailto:northampton.sm@marksandspencer.com)



*Consider the environment - do you really need to print this email?*

.....

Unless otherwise stated above:

Marks and Spencer plc

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Waterside House

35 North Wharf Road

London

W2 1NW

Registered No. 214436 in England and Wales.

Telephone (020) 7935 4422

Facsimile (020) 7487 2670

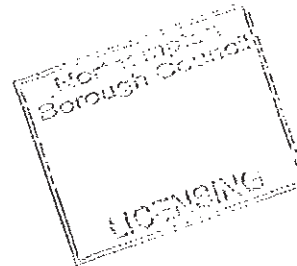
[www.marksandspencer.com](http://www.marksandspencer.com)

Please note that electronic mail may be monitored.



16<sup>th</sup> March 2013

The Licensing Department  
Northampton Borough Council  
The Guild Hall  
St Giles Square  
Northampton  
NN1 1DE



## Re: Early Morning Restriction Order

Dear Sir/Madam

Following your letter with regard to the Council's consultation regarding the introduction of an EMRO into Northampton I have the following comments that I would like to be noted by the Licensing Committee.

- We have been informed that the political will from the Police/ Council leadership, and Crime Commissioner is such that the introduction of an EMRO is considered by the Police a foregone conclusion. This is a disappointment in terms of local democracy, especially as an EMRO was originally intended to be a sanction of the last resort.
- We don't feel that the situation has reached anything like as serious as requiring a measure of last resort given that Northampton has an award winning Pubwatch, and a diverse and vibrant range of venues, many of whom participate in Bast Bar None every year.
- The Licensing Act of 2003 gives Police and Local Authority the powers required to individually review the licences of premises that are felt to be trading in contravention of the Licensing Objectives. To our knowledge this has not occurred with relation to the early morning retail of alcohol.

Given the 'foregone conclusion' that an EMRO will be granted we have the following comments relating to the eventual terms of the EMRO:

- The late night economy is a safe and happy environment for the vast majority of Northampton's residents – and increasingly those of outlying town such as Milton Keynes who visit Northampton at weekends. While some people may disapprove,

Manula Bar Company Ltd. Registered in England 6663228  
Hakamou Bar, 1 Wood Street, Northampton, NN1 2ED  
VAT No 985248671  
[www.hakamou.co.uk](http://www.hakamou.co.uk)

they might perhaps do well to remember that the weekend out on the town for people who work hard all week is a tradition that has existed for much longer than a few decades. **The town centre is a focal point for people to meet, form relationships, and enjoy themselves. Most people do, and they deserve to be protected by the police and local authority – not penalised by them.**

- The granting of an EMRO is an admission by the local authority and Police that they have lost control of the streets, and have failed in addressing problems at individual premises. The creation of an inaccurate fear of crime could be very damaging to reputation of Northampton – and have a subsequent negative impact upon the late night economy. **From a PR point of view the perception will be one of Northampton has awarded itself an ASBO due to the inappropriate behaviour of a very small number of people. This will result in closures of businesses, job losses (especially in the 18-21 age group), and a reduction in business taxes etc.**
- The setting of a terminal time for retailing of alcohol that is too early will not allow for natural dispersal, and will instead lead to very large numbers of people congregating on streets with limited numbers of taxis and take-aways available. **Not only will we potentially then have a fear of crime – we could have a very real escalation in crime, especially during the warmer summer months.**
- In addition to the above, Northampton could see the phenomenon that has arisen already around New Year's Eve – namely that people (understandably but inaccurately) fearful of no taxis, high prices and long service times don't come into town preferring instead to hold house parties throughout the town. **Such unregulated drinking could lead to greater harm from alcohol given cheaper prices, the size of 'home measures' – and also lead to wider problems of nuisance to neighbours. We imagine that the Police would be far greater stretched if they had to employ their limited resources throughout residential areas as opposed to just the town centre.**
- Also, further to the above if all venues have to stop serving at the same time any pressures from doing so at an hour that customers perceive as being unreasonably early could result in a whole host of venues all requiring the assistance of the police at the same time.
- Finally, there is talk of a 'level playing field' where all businesses will have to compete based on quality/safety rather than trading times. This would be true, unless an inequality is created where venues such as casinos, lap dancing venues, or other outlying businesses were suddenly 'gifted' an opportunity by the EMRO.



## THE MOUNTS MEDICAL CENTRE

DR J A G D RAPHAËL  
DR A J WILLIAMS  
DR S S DALE  
DR S SADEK  
DR A A SHURRAB  
DR S N MIRZA  
DR A SAEED

CAMPBELL STREET  
NORTHAMPTON  
NN1 3DS

CHIEF EXECUTIVE  
RECEIVED

18 MAR 2013

CEX 5375

TEL: 0844 387 8181

FAX: 0844 387 8180

C M/K38025

David Kennedy  
The Licensing Department  
Northampton Borough Council  
The Guildhall  
St Giles Square  
Northampton  
NN1 1 DE

Dear Mr Kennedy

Thank you for your letter from Philip Bayliss dated the 28<sup>th</sup> February 2013. My name is             
           I am one of the senior partners at The Mounts Medical Centre. I understand that the Council is thinking of adopting an EMRO (Early Morning Restriction Order).

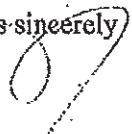
I would wholly support the concept of an EMRO. The Mounts Medical Centre has been ~~plagued by local drunks who congregate around our premises and frequently have to be moved on by the Police.~~ Not only is this unsociable for the patients that visit our surgery in terms of the very old and the very young, but it also creates a health hazard in terms of the fact that they urinate, vomit and leave glass smashed around our fire exits.

I have written a copy of a letter to the Police previously and I enclose a copy of my previous letter and their reply which I got back from the local Police force. In fact, the Police have been contacted several times at Campbell Square and I am sure you would be able to get a record of the times that they have had to be called out to us due to having to move on the drunks during the day-time from around the Medical Centre.

The Mounts Medical Centre is already working in an area of high deprivation dealing with patients with very complex social needs. We do not feel that we can have added pressures on us. I think this EMRO would help prevent crime and disorder and obviously the public safety is paramount as we have 15,000 patients of various ethnic minorities who come and attend the surgery, and also the prevention of being a public nuisance, loitering around our surgery and most importantly the protection of children from harm.

I would strongly support an EMRO and any other measures the Council can apply. I am sorry to say that since the Oasis Centre was built for the homeless, this has increased considerable the problems that we have faced with the above problems from people suffering with chronic alcohol dependence and abuse.

Yours sincerely





5<sup>th</sup> April 2013

The Licensing Department  
Northampton Borough Council  
The Guildhall  
St Giles Square  
Northampton, NN1 1DE

E-mail: [licensing@northampton.gov.uk](mailto:licensing@northampton.gov.uk)

To: The Licensing Officer

### Early Morning Restriction Orders - EMRO

The National Casino Industry Forum (NCiF) is the major trade body representing the land based casino industry. NCiF represents all the major operators in the UK and most of the smaller independent operators. Together our members hold 90% of all casino licences.

We are grateful for the opportunity to express our concerns regarding the possible introduction of Early Morning Restriction Orders, (EMRO) introduced by sub-sections 172A to 172E in the Licensing Act 2003.

We support the intended purpose of this legislation, which we understand is to address concerns in the operation of the late night economy ("EMROs will help licensing authorities to address specific problems caused by late night supply of alcohol in their areas", para. 2.01, 'Dealing With The Problems Of Late Night Drinking, Response to Consultation', July 2012 – the Response document) and are aware that for this reason a licensing authority will be given the power to restrict the sale of alcohol, where it considers it appropriate, between midnight and 06:00hrs. However, the legislation recognises that not all premises that open during these hours are a cause of late night, alcohol fuelled, anti-social behaviour in our town and city centres. For that reason a balance must be sought to ensure that only those implicated in contributing to the problem are the recipients of this restriction on trade.

Given the provision of sanctions already available to licensing authorities, the police and others to deal with those premises in breach of the Licensing Objectives (from Reviews on specific premises, to the establishment of a Cumulative Impact Area) the imposition of an EMRO must be seen as a final resort, and an admission of failure by both businesses and the regulators to deal with the problem in their area. But, and this in our view is a very important 'but', it is a blunt instrument. Within a discrete geographical area it potentially punishes all for the transgressions of the few. Given the range of sanctions available (Reviews to Cumulative Impact Areas) we are very concerned that businesses in our sector may be punished for problems they do not contribute to, but instead help to mitigate by offering different types of entertainment in the late night economy not centred around social drinking.

Alcohol sales are a small part of a casino's overall business model, in these tough economic times, maintaining our full offer to customers is vital. If EMROs are implemented without protecting those sectors of the night time economy that clearly do not contribute to the problem it will drive away

those very businesses that add attraction, vigour and variety to our town and city centres and encourage tourism.

The casino sector is highly regulated and provides employment for thousands of people adding value to the local economy as well as millions of pounds to the Exchequer every year. The potential damage of the 'catch-all' approach of an EMRO as currently proposed is catastrophic.

We understand that licensing authorities are able to draw around specific premises within an EMRO area to exclude those particular businesses from the sanction. Given the clear intent of the legislation to focus on those irresponsible retailers of alcohol, sometimes referred to as 'Vertical Drinking Establishments', we respectfully request that casino establishments remain outside of any EMRO designated area, allowing them to continue to contribute to the positive night time entertainment environment in UK towns and city centres.

Licensing authorities have also made clear their concern that the lack of an appeal procedure against a decision to impose an EMRO may well lead to a number of legal challenges by way of Judicial Review.

Chief Executive

# NORTHAMPTON PRIVATE HIRE ASSOCIATION

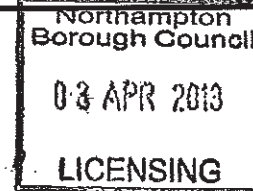
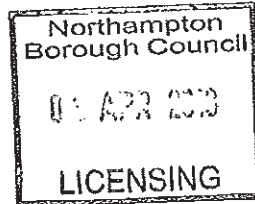


64 Crofters Close, East Hunsbury, Northampton, NN4 0QD

Tel: 07860 763398

e-mail: [steve.ward@email.com](mailto:steve.ward@email.com)

Licensing Department  
Northampton Borough Council  
The Guildhall  
St Giles Square  
Northampton  
NN1 1DE



Date: 30<sup>th</sup> March 2013

Dear Sirs,

Once upon a time when I was in my late teens / early twenties I used to frequent pubs and clubs on a much more regular basis than I do today. The evening would generally start somewhere between 7.30pm and 9.00pm. If we just went to the pub we would generally be home somewhere around 11.30pm, plenty early enough to be up for work the next day. On Saturday night we would probably extend the evening by going to a nightclub afterwards. As nightclubs then closed at 2.00am we would probably be home by 2.30am after getting a taxi.

This scenario carried on with other youngsters long after I left that part of my life behind. Most people were reasonably happy with this and it worked. My main point here is that most people like to go out on the town when everybody else is out on the town.

Shift forward some years until the government of the day decided that we should to be introduced to the café culture of Europe, introducing the so-called 24 hour opening times. Unfortunately if you have ever been to any of the European holiday resorts frequented by the Club 18-30 type groups you would have seen what we were most likely to get. And we did get it. Although we are in Europe, we are not by any stretch of the imagination Europeans.

Many pub landlords were rubbing their hand with delight with this news at the time. They thought it would be a bonanza for them. Unfortunately this was not to be the case. Most bar owners will admit that they are selling less than ever. The supermarkets have done well out of it though.

We now have a situation where most youngsters do not come into town until about midnight on Friday and Saturday nights. Many who would come out earlier won't, as their friends don't. And because most revellers are not coming out until midnight they are drinking heavily before they go into town. So when they get into town they are already drunk in many cases, so most of their drinking when in the bars is just a top up. Has it not always been the case that the cost of drinking in bars limits to a large degree the actual consumption?

Because most night revellers are coming out so late, they are going home even later. Some bars are staying open until 6.00am in the morning, and those that aren't are applying for extensions to be able to. The massive expense of policing all this activity until this hour must be horrendous. It's now getting ridiculous. When I am working ( as a private hire driver) I am often bringing revellers into town at 2.00am.

I have no wish to be a killjoy, but would it not be nice to just turn the clock back a few years? In my view opening until midnight for most bars is plenty late enough. Some would complain at first, but they would soon adapt to a new regime as they have already adapted to the one we have at present, and come into town at a reasonable hour. They would then go home at a reasonable hour.

I would however like to see something like the old nightclub system introduced. Perhaps until 2.00am.

So in my view bring on your EMRO. Even if it is an admission that the whole experiment has been a dismal failure.

Drivers Representative

**Bill Edwards**

---

**From:** Bill Edwards on behalf of Licensing  
**Sent:** [REDACTED]  
**To:** [REDACTED]  
**Subject:** RE: Early Morning Restriction Order

Dear Mr Wilson,

Thankyou for your e-mail. Your concerns have been duly noted.

The letter of the 27<sup>th</sup> was an initial letter looking for general feedback on the feasibility of an EMRO and as you can imagine there has been a mix of responses.

If an application for an EMRO is put forward there will be a consultation period of 42 days. It is at that stage that the specifics of the proposal will be made public allowing you the opportunity to file a formal objection to the EMRO.

Kind regards

Bill Edwards  
Licensing Officer  
Northampton Borough Council

---

**From:** [REDACTED]  
**Sent:** 04 April 2013 10:51  
**To:** Licensing  
**Subject:** FW: Early Morning Restriction Order

Dear Sir / Madam

I understand from the letter dated 27 February 2013 Northampton Council are considering introducing an Early Morning Restriction Order and I would like to register an objection against the implementation of an EMRO on the Northampton town centre area.

Whilst I understand the reasons for the proposal detailed in the letter, the implementation of an EMRO will put the Park Inn Northampton at competitive disadvantage when tendering for event business against other venues that do not have a restriction on the sale of alcohol. The hotel will also risk losing revenues, as the majority of our beverage sales to residents occur over the bar and if this source of revenue is closed between midnight - 06:00 this would impact our revenues and may also end up with the hotel losing the residential business as we are not able to off the same service as our competitor would if the EMRO is adopted.

There would also be an increase to our costs if the EMRO is adopted as the hotel would then be serving alcohol to the rooms which would have a greater impact on our labour costs.

With the potential loss of business to the Park Inn Northampton there could also be an economic impact on the other local businesses in the area that get associated revenue when events and guest accommodation occur at the Park Inn Northampton.

Regards

---

Please consider the environment before printing this e-mail.

District Financial Controller

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matthew.wilson@rezidorparkinn.com

[www.parkinn.co.uk/hotel-northampton](http://www.parkinn.co.uk/hotel-northampton)

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**Philip Bayliss**

---

**From:** [REDACTED]  
**Sent:** 19 March 2013 08:24  
**To:** Licensing  
**Cc:** Dee  
**Subject:** EMRO's

**Categories:** Red Category

Dear Sir/Madam,

Our estate is situated between Kettering Road and Wellingborough Road, and has 2 public footpaths going through the estate.

In this area there are too many establishments ie supermarkets, pubs, premises selling alcohol at all times.

We have a constant problem with drunks not only through their anti social behaviour, shouting, arguing, knocking on residents doors/windows, but throwing cans and their takeaway rubbish on the paths as they walk through.

Some have even been seen going to the toilet against residents garden walls/fences in full view of everyone passing, as this is happening 24/7.

Therefore, I speak on behalf of all residents of Portland Place, Exeter Place, Market Street/Walk, Brunswick Place/Walk, when I state that we would prefer the selling of alcohol to return to normal licensing hours.

To sell alcohol in the early hours of the morning is absolutely ridiculous.

from,

[REDACTED]  
Chair of P.E.M.B.A Residents Association

Licensing Department  
Northampton Borough Council  
The Guildhall  
St Giles Square  
Northampton  
Northamptonshire  
NN1 1DE

**By email only:** [licensing@northampton.gov.uk](mailto:licensing@northampton.gov.uk)

Date: 05 April 2013

Our ref: JS/SH/P42116-3  
Doc Ref: 2144375649

Your ref:

E-mail:

Direct line: 0115 9538505

Dear Sirs

## **Early Morning Restriction Order (EMRO)**

We are instructed by the Association of Licensed Multiple Retailers to make representations in relation to the proposal to introduce an EMRO in Northampton and are responding to your letter dated 27 February 2013.

The Association of Licensed Multiple Retailers (ALMR) is the only national trade body dedicated to representing the views of pub, bar and casual dining operators and, following the absorption of the Bar, Entertainment & Discotheque Association (BEDA) into membership in May 2012, the only trade body for nightclubs and the voice of the late night economy.

ALMR's 153 member companies operate just over 13,500 outlets – almost all the managed outlets in the UK – between them employing 325,000 people. These outlets are primarily pubs and bars but also include casual dining outlets, restaurants, licensed accommodation providers and nightclubs.

Licensed hospitality is one of the UK's primary economy sectors. It has a turnover of £21 billion, and in the past year its contribution to GDP increased by over 8% – the average GVA each bar makes to its local community is £190k per annum. Around half a million people are employed directly in bars and nightclubs alone, with jobs in all regions for all ages and all skill levels. Crucially, the sector provides the first taste of work for many young people and generated 1 in 6 of all new jobs for 18-24 year olds in the last year. Therefore, while the sector is occasionally depicted in a negative light, it is a crucial component of the economy both nationally and locally, as well as providing leisure opportunities for local communities and forming part of the tourist draw of the UK's towns and cities.

This letter will address the general principle of introducing an EMRO as opposed to any specific proposals put forward. The proposal for an EMRO is unclear from your letter in terms of:

- when it is to be introduced;
- what area is it to cover;
- what time will the sale of alcohol be restricted to.

We make the following observations on behalf of the ALMR, concerning the socio-economic effect of the proposed EMRO. While these representations are not directly concerned with the promotion of the licensing objectives, they do concern the question of whether it is appropriate to make an EMRO, in accordance with section 172A of the Licensing Act 2003. In similar vein, the section 182 National Guidance to the Licensing Act 2003 to which the authority is bound to have regard states in terms at paragraph 16.8 that authorities have to consider the potential burden that would be imposed on premises licence holders. The burden that would be imposed on premises licence holders is not directly concerned with the promotion of the licensing objectives, but is to be brought into account because it goes to the appropriateness of the order. In the same way, other socio-economic considerations must be brought into account.

ALMR submits that the proposed EMRO will have the following effects:

- It will reduce spend in the town centre.
- It will reduce the viability and profitability of the premises affected by the order.
- It will reduce the wages which are paid to local workers, many of whom are young workers, and/or reduce employment in the town centre.
- It is likely to or threatens to cause the closure of those premises such as nightclubs which are reliant on late night trade, with a consequent loss of jobs among those directly employed such as the nightclub staff and door staff together with jobs which derive income from the patronage of the venue such as minicabs and taxis.
- To that extent, it threatens the viability of other premises and businesses which are reliant on the trade of the nightclub, in particular local suppliers, feeder bars and other venues which depend in part on the desire of customers for linked trips such as restaurants and cinemas.
- It will cause multiple premises to stop selling alcohol at the same time creating a 'surge' of customers on to the street at the same time creating flashpoints at taxi ranks and takeaways.
- It will reduce choice and diversity within the town centre.
- It risks driving late night trade to competitor centres.

- It will reduce the demand for investment in the town centre, both as a direct consequence of the limitation on the ability of freeholders to use their premises for the purposes of their businesses and because the EMRO will send out a negative message to prospective investors as to the desire of the authorities to encourage business investment.
- It will reduce the capacity of the town centre to engage in regeneration initiatives.
- At a time of austerity, it risks driving the night time economy in the town centre into a spiral of decline. Given that town centre vacancy levels in the day time economy are running at historically high levels, with the continuing demise of a number of well-known high street brands, it is the more important that this is balanced by a vibrant, successful night time economy.

The authority will wish to take into account that the night time economy of town centres has been built up over a period of decades and depends on a network of mutually inter-dependent businesses combining to create a critical mass of leisure attractions, drawing a stream of customers whose spending in turn funds employment, investment and perpetuation of the economy. The effect of an artificial truncation of trade among multiple premises is untested in the United Kingdom economy, but the socio-economic consequences are multi-faceted and potentially severe. Therefore a precautionary approach is justified.

Furthermore, the authority will wish to bear in mind that investors in late night town centre businesses will frequently have taken on long, onerous leases with restrictions on assignment, and will have invested substantial sums which can only be recouped over long periods of time. The effect of a truncation of the hours of trade may be to convert leases from assets to liabilities and to waste very large sums invested. Where the premises management is at fault, and a review ensues, that eventuality can be regarded as a fair risk attaching to the business. Where no allegation of fault is made, the undermining of the investment which the EMRO brings about is unfair.

For all these reasons, together with those set out in the attached representations, the authority is requested to refrain from making an EMRO in this case.

There is a requirement on the authority both in adopting a human rights-compliant approach, and following the National Guidance to the Licensing Act 2003 at paragraph 16.8, that before introducing an EMRO, an authority should consider whether other measures may address the problems that have been identified as justifying an EMRO. Those measures might include:

- Introducing a cumulative impact policy.
- Reviewing licences of specific problem premises.
- Encouraging the creation of business-led best practice schemes, such as Purple Flag.

- Using other mechanisms such as those set out in paragraph 13.39 of the Guidance, including:
  - planning controls;
  - positive measures to create a safe and clean town centre environment in partnership with local businesses, transport operators and other departments of the local authority;
  - the provision of CCTV surveillance in town centres, taxi ranks, provision of public conveniences open late at night, street cleaning and litter patrols;
  - powers of local authorities to designate parts of the local authority area as places where alcohol may not be consumed publicly;
  - the confiscation of alcohol from adults and children in designated areas;
  - police enforcement of the general law concerning disorder and anti-social behaviour, including the issuing of fixed penalty notices;
  - prosecution for the offence of selling alcohol to a person who is drunk (or allowing such a sale);
  - police powers to close down instantly for up to 24 hours (extendable to 48 hours) any licensed premises in respect of which a TEN has effect on grounds of disorder, the likelihood of disorder, or noise emanating from the premises causing a nuisance;
  - the power of the police, other responsible authorities or other persons to seek a review of a licence or certificate.

Without such consideration properly given, it cannot rationally be concluded that it is proportionate to remove legal rights enjoyed by businesses in the area of the authority.

Even at its most basic level, if particular premises are causing harm to the licensing objectives, then there is provision to review their licences. If they are not, then their right to trade should not be removed by the imposition of an EMRO. In any event, there is a plethora of powers available to regulatory authorities, and quite clearly the blanket removal of rights to trade should not be considered until other measures which are not so damaging to local businesses have been properly considered.

Further, in order that the human rights of licensees can properly be brought into consideration, it is necessary to consider the burden upon those licensees of introducing the restrictions under the EMRO. This involves consideration of the burden on each and every licensee affected, in order to ascertain whether the effect upon them is excessive or disproportionate.

### **Conclusion**

We simply do not have sufficient information at this stage to comment fully on the proposal to introduce an EMRO for the reasons outlined above.

In any event before any consultation exercise starts, you the authority must consider:



- The burden placed on Premises Licence Holders by an EMRO;
- The socio-economic effects of introducing an EMRO;
- Other measures that can be adopted to address the problems that the Police may have identified as justifying the implementation of an EMRO

Without exploring the above it is simply too early to start the consultation process.

Yours faithfully



Poppleston Allen

-----Original Message-----  
From: [redacted]@ents.com]  
Sent: Thursday, March 21, 2013 06:58 PM GMT Standard Time  
To: Dav (Cllr); Licensing  
Cc: Colin  
Subject: RE: EMRO

Hi

Thanks for your email. My initial feelings re an EMRO are as follows:

- Whilst most of us 'idealistically' agreed with the concept of responsible adults being able to drink at any time of day without having to be in a hotel or nightclub, we always knew elongated drinking times would drive up the on-trades operating costs whilst people would still only be able to spend the same amount of their income on going out.
- We did not perhaps realise that the supermarkets would have the 'game changing' impact that they have had.
- Despite Adrian Lee's assertion that people will come out earlier if/when EMRO is introduced, no-one can be certain that he is correct and that they won't continue to 'pre-load' with supermarket booze.
- There is also the argument that if on-licences close earlier, will people re-locate to house parties – if they do, the Police will have to cover a wider area putting greater strain on their already meagre staffing.
- My feelings are that due to Police budgets and the on-trades running costs, reality suggests there should be an EMRO from 2am or 3am – this, I feel, should apply to all venues within the town so we're all on a level playing field. It must also be recognised, however, that there is a risk that people will travel to Milton Keynes

and to Birmingham and bypass Northampton as a night-time destination – I would be inclined to take that risk!

- A successful Northampton town centre is one where pensioners can walk down Bridger St at midnight without fear or intimidation. To achieve this aim the Police will need to do a better job dealing with unacceptable behaviour and must do so consistently; and problem venues must be tackled: it mystifies me that one of the most notorious town centre venues for trouble won Best Bar None awards last year. Also, that Pubwatch had its last meeting in a venue selling drinks for 90 pence!
- Pre-loading will probably be best tackled by creating greater parity of price between the on-trade and the off-trade – however that may be achieved!

Regards,

# roadmender

05<sup>th</sup> April 2013  
The Licensing Department  
Northampton Borough Council  
The Guildhall  
Northampton  
NN1 1DE

## Personal Details

I am: An individual or body which is not a responsible authority.

## Name:

The Roadmender Ltd  
The Roadmender is a Live Music Venue within Northampton which provides late night entertainment to over 1500 persons per week, the venue employs over 30 persons of which work during the hours of 2100-0400.

## Address:

1 Lady's lane  
Northampton  
NN1 3AH

## View

The introduction of an EMRO would have a severe impact on the local Night Time Economy

05<sup>th</sup> April 2013

1 Lady's Lane  
Northampton  
NN1 3AH  
Tele: 01604 231688  
[WWW.TheRoadmender.com](http://WWW.TheRoadmender.com)



Contact name: [REDACTED]  
Contact e-mail: [REDACTED]  
Contact number: [REDACTED]

4<sup>th</sup> April 2013.

licensing@northampton.gov.uk

Dear Sirs,

**Re: Potential implementation of Early Morning Restriction Orders (EMROs) in Northampton**

I am writing with reference to the potential adoption and implementation of EMROs in Northampton.

Rochmills Limited own various freehold properties in Northampton, including the licensed premises at 145 Wellingborough Rd (Fusion, Thall and Fuse) and 357-363 Wellingborough Rd (Corkers and Mem-Saab). Although these premises are currently tenanted, we as the Landlord and freehold owners are concerned about the potential implications of EMROs on our current tenants and also about attracting further tenants in the future.

Also, we have concerns that if EMROs were to be implemented for only part of the town (e.g. Bridge Street) it would effectively move the problem to other areas of the town, which could cause issues for our premises.

As a company we have always been passionate about investing in Northampton and have future plans for the various sites in the town. Some of the potential development opportunities for these sites are based upon the possibility of the University of Northampton moving towards the town centre. If EMROs are implemented we are concerned that this could adversely influence potential students decisions about where to go to university (this has been the documented view on various websites since the subject of potential EMROs in Northampton was raised).

We believe that Northampton needs investment and improvement to grow as a town and feel that if EMROs are implemented that it would stunt growth and be a real step back for the town.

Personally, I also believe that EMROs would increase the risk of anti-social behaviour and violence associated with excessive alcohol consumption. In my opinion people who choose to binge drink and cause problems will not choose to drink less, they will simply drink the same amount in a shorter time period. If the licensed premises then all close at the same time you will have a vast amount of intoxicated people entering the streets at the same time, and trouble and violence is bound to ensue.

Although we are in agreement that policing problems resulting from excessive alcohol consumption should be tackled, we do not believe that EMROs are the best way of doing so. The individuals and businesses that are instigating or contributing to the problem should be tackled as opposed to punishing the many for the actions of the few.

In summary, as a business owner in Northampton we, and our tenants, face enough challenges in the current economic climate without facing additional pressure brought about by implementation of EMROs.

Yours faithfully,

1



Rowd 18.3-13



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**South East Midlands Branch  
Working Men's Club & Institute Union Limited**

1 Shirley Road Rushden Northants NN10 6BY  
Telephone: 01933 315372 Facsimile: - 01933 315436  
E-mail:- [semciu@wmcui.org.uk](mailto:semciu@wmcui.org.uk)

CG/KM

14 March 2013

Councillor David Mackintosh  
Leader of Northampton Borough Council  
The Guildhall  
St. Giles Square  
Northampton  
NN1 1DE

Dear Councillor Mackintosh,

I have been contacted by our Vocal and Instrumental Club, 26 Bailiff Street, Northampton, NN1 3YD, who come under the umbrella of this Organisation.

The Secretary informs me that a letter has been sent to all clubs in the Borough regarding an Early Morning Restriction Order and requesting responses, to which the addressed Club will be replying.

As the umbrella Organisation for many non-profit making clubs in the Borough I would ask that in addition to the clubs being notified, a copy of all correspondence be sent to these offices to enable us to evaluate.

Thank you,

Yours sincerely

Cc: Clubs in the Northampton Borough

President: Barry Slasberg, CMD    Vice President: Mick Bott    Secretary: Carol Goddard  
Vat Registration No 119 9874 19

**Bill Edwards**

---

**From:** [REDACTED]  
**Sent:** 01 April 2013 14:53  
**To:** Licensing  
**Subject:** EMRO  
**Attachments:** The Licensing Department.docx

Dear Sir/Madam

I have attached comments on the proposed adoption of an EMRO.

Yours faithfully

[REDACTED]



The Licensing Department  
Northampton Borough Council  
The Guildhall  
St Giles Square  
Northampton NN1 1DE

2<sup>nd</sup> April 2013

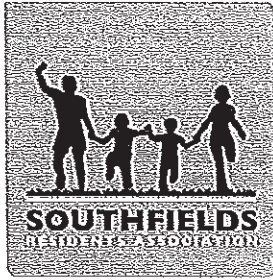
**Early Morning Restriction Order**

Dear Sir/Madam,

I refer to an open letter sent to the Northampton Federation of Residents' Associations regarding the proposed consultation relating to EMRO's. The content of this letter was discussed at the March meeting of the Southfields Residents' Association of which I am a committee member. I have been asked by SRA to respond.

Southfields is on the edge of Northampton Borough where apart from on New Year's Day the sale of alcohol doesn't take place after 12 midnight. The following comments therefore relate to town centre areas where there are known to be alcohol related crime, disorder, noise and safety problems between 12 midnight and 6am.

Permitting the sale of alcohol throughout the day was doubtless once considered by some people to be a good idea, the theory being that anyone wishing to consume a large amount of alcohol as part of their late night recreational activities could spread their alcohol consumption over a long period of time. Critics of an EMRO will perhaps argue that people who want to consume a fair amount of alcohol will simply get all their drinking in earlier, there will still be the same amount of crime, disorder, noise and safety problems; the problems will simply occur before 12 midnight. My feeling is that even if actual numbers of drinkers and actual alcohol consumption doesn't reduce with an EMRO the reduced hours in which alcoholic drinks can be purchased could make it easier for the police to manage the town centre problems and reduce the undesirable resultant effects.



Those who run pubs and clubs in the town centre will probably be concerned that an EMRO will have a significant adverse effect on their trade. The reality may be that the currently popular and successful town centre pubs and clubs will adapt their business to an EMRO and reasonable trade will continue.

The people who run the pubs and clubs in areas such as Bridge Street are running a business and should not be unreasonably restricted in the way they run their business. All businesses do however need to consider the effect their business has on other people. It is known that late night/early morning town

centre pub and club business is responsible for alcohol fueled disorderly behavior that results in considerable problems for the police and often the ambulance and hospital emergency service as well.

Southfields Residents Association supports the adoption of an EMRO in the main town centre areas every day between 12 midnight and 6am subject to having firm support from Northamptonshire Police and there being identifiable evidence of a problem where an alternative reasonably practical solution to the problem has not been found.

Yours faithfully

  
on behalf of Southfields Residents Association

*Northampton St James Working Men's Club,  
Weedon Road,  
St James,  
Northampton      Tel No Club 01604 751686  
NN5 5BE                      Office 01604 456602*

25<sup>th</sup> March 2013

The Licencing Department,  
Northampton Borough Council,  
The Guildhall,  
St Giles Square,  
Northampton.

Dear Sir/Madam,

Thank you for your letter of 27<sup>th</sup> February 2013 concerning the Early Morning Restriction order (EMRO), this was read to the Executive Committee of this club at their last meeting.

They agreed that they would support this restriction, obviously apart from New Years Eve into New Years Day, as they feel that opening until midnight suits the club's requirements.

Yours sincerely,

  
  
Secretary





Philip Bayliss

---

From: [REDACTED]  
Sent: 19 March 2013 12:02  
To: Licensing

Dear Sir/Madam

The EMRO is not really applicable to St Matthew's Church as such. However, we would support such an order in principle to promote the 4 licencing objectives.

Kind regards.

[REDACTED]  
Churchwarden at St Matthew's

[REDACTED]

Taxi driver, Licence number

14/3/2013

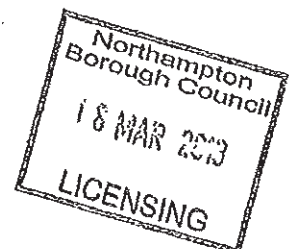
Dear Sir or Madam,

Regarding Early Morning Restriction Order

I have to say that I was saddened and disappointed to see this proposal. I work in Northampton in the early hours of the morning, taking as my passengers people who have enjoyed a night out in Northampton, and can honestly say that their standards of behaviour are excellent. I find that my passengers queue politely, are respectful of others, and just wish to go home safely.

However, it must be noted that there is congestion on Bridge Street, largely do to the building work, and congestion at the top of Drapery due to the large volume of private hire cars there, and again more building work. This could be resolved in an instant if taxis were allowed to go through St Giles Square in both directions. This would instantly reduce pressure on the whole area.

Yours Sincerely,

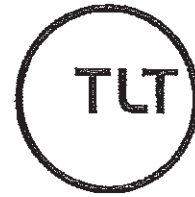


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Our ref 303L/MP01/CS03/83944/1703  
Your ref



The Licensing Team  
Guildhall  
St Charles Square  
NORTHAMPTON  
NN1 1DE

By post & email: [licensing@northampton.gov.uk](mailto:licensing@northampton.gov.uk)

Direct tel +44 (0)117 917 8815 Date 9 April 2013  
Direct fax +44 (0)117 917 7566 Email

Please note telephone calls may be recorded for training or regulatory purposes

Dear Sirs

**Response on behalf of Spirit Pub Company in relation to the proposed implementation of an Early Morning Restriction Order within Northampton Borough**

We act for Spirit Pub Company plc, operators of a significant number of premises within Northampton Borough, in both their managed and leased estates.

You have asked for comments in relation to the council's consideration of the introduction of an early morning restriction order and on behalf of our client would comment as follows:-

**Remit of early morning restriction order (EMRO)**

As you are aware the remit for adoption of an EMRO is wide, in comparison with late night levy for instance. Given that potentially wide remit but bearing in mind the preliminary nature of your consultation we have concentrated on high level points of principle. As you develop your consideration we would appreciate the opportunity to refine those comments in light of any greater detail which may become available.

The implementation of an EMRO confers the right for the Committee to designate particular areas subject to the EMRO, rather than it being imposed uniformly across the borough. This potentially calls into question the areas to be designated and also the impact on premises just outside those areas. The likelihood is that late night premises simply 'migrate' to the edges of those areas, with either existing premises looking to extend hours or new premises or 'displaced' premises seeking new licences.

**Hours of the early morning restriction order**

As the council are aware, EMRO hours can be implemented from midnight to 6.00am in any given area. Given that the Licensing Act 2003 established a regime where premises licence holders were encouraged to apply for the hours for their premises that they felt were

Offices in London, Bristol and Prague.  
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appropriate, (with the right for responsible authorities and residents in the immediate vicinity to make representations against such an application), the imposition of an EMRO fundamentally runs counter to this principle. The purpose of an EMRO is effectively to curtail the hours of trading at an arbitrary point, which is counter-intuitive to the idea that licensing hours should not be arbitrary but based on a reasonable balance between interests. Set closing, was proven to put an unnecessary strain put on resources and services at particular times and a reversion to this principal may do the same.

As such, when considering whether to introduce an EMRO or not the Committee needs to look very carefully at the premises likely to be affected in any given area and the financial implications of curtailing hours that these premises currently operate. In particular, the committee needs to bear in mind that business plans for these businesses, including levels of investment based on anticipated trading would have been drawn up and considered in light of permissions to trade that they had been granted by your committee and which now may be arbitrarily restricted.

It follows on from this point that in setting areas with different arbitrary closing times when compared to other adjacent areas, which will still have unrestricted closing times (subject to applications being granted), the implementation of an early morning restriction order may well have unforeseen consequences in terms of competition, being unfairly skewed within the borough. If neighbouring authorities also adopt EMRO's but with different hours then those unforeseen consequences may be multiplied

#### Exceptions to early morning restriction orders

Our client intends to make no comment at this time in relation to the hotel provisions. However, we suggest that the committee should look very carefully at the effect of restricting temporary event notices and also New Years Eve by way of the EMRO. There is the possibility of exempting New Years Eve, however, temporary event notices are affected by the implementation of an EMRO with no right to sell alcohol later than is stipulated in the order. This may have a serious knock-on effect on premises on 'special' days and indeed may have cultural effects in terms of restricting opening for premises for special events such as the 2013 Lions tour to Australia where it has been traditional for pubs to open early in the morning and serve drinks (and breakfast) to sports fans looking to watch the matches.

#### Evidential issues

An EMRO can only be introduced where evidence identifies areas where restrictions on the night time economy are necessary because of significant issues of crime and disorder. This evidential base should be founded upon a proper assessment of crime and disorder in the entire borough, along with specific analysis showing areas identified where crime and disorder is particularly prevalent or occurs as a direct result of the night time economy and not for other reasons.

It is imperative that such an assessment is properly carried out and correctly links cause, effect and proposed solution, given the potential effects of implementation of an EMRO on businesses operating in the area, in order to justify any such restriction. All such information needs to be made available to premises likely to be affected (including those outside of proposed EMRO areas) as this will need to be properly analysed to ensure that adoption of an EMRO is indeed necessary or appropriate.

#### Conclusions

Our client's concerns are that any implementation of an EMRO within areas identified in the borough could potentially have unintended consequences on the distribution and nature of

premises participating in the late night/early morning economy. In addition, the introduction of an EMRO is contrary to one of the fundamental tenants of the Licensing Act 2003, that of staggered closing hours and indeed there is a very real likelihood that the implementation of an EMRO will artificially create a strain on resources at given points of an evening as was the case prior to the implementation of the Licensing Act 2003. It is not felt that EMRO's offer a practical and balanced approach to issues relating to premises that trade late into the night and in doing so provide jobs, taxes and vibrancy to town centres, nor one that is necessarily likely to be effective to deal with any proven cause and effect of late night/early morning licensing hours and crime/disorder.

Our client will almost certainly want to take part in any full consultation on the matter, in particular once the council licensing committee has considered those areas that they wish to introduce an EMRO. As such we would ask to be kept informed of any such consultation.

Yours faithfully



TLT

TLT LLP





Dear Sirs,

In response to your consultation regarding the feasibility of adopting an EMRO across the Borough of Northampton.

The University of Northampton Students' Union does not support an application for an Early Morning Restriction Order (EMRO) within the Borough of Northampton.

Our reasons for this are as follows: -

- The Students' Union operates licensed premises within the Borough of Northampton. We adhere strictly to the principles of: -
  - The prevention of crime and disorder;
  - Public safety;
  - The prevention of public nuisance; and
  - The protection of children from harm.

Our operations are considered by the police authority to be safe and appropriate; we have won 'Best Bar None' twice for the county, and have been awarded Gold and Bronze in the NUS National events, further demonstrating our commitment to safety and security. An EMRO would financially penalise our operations as well as severely curtailing our ability to meet our members needs by providing social events and opportunities, although no problems with our provision exists.

- It is our belief that problem behaviour is perpetrated by a very small minority, of whom few, if any, are our members. An EMRO would effectively 'punish' the law-abiding majority wishing to enjoy Northampton's night-time amenities as well as harming the night-time economy of the town as a whole.
- It is similarly our belief that an emphasis upon reducing inappropriate drinks promotion activity and innovative alcohol awareness campaigns would be a more effective way of reducing inappropriate behaviours as this would impact upon the actual problem, and would not punish the innocent, nor licensees.

Yours Sincerely,

(Chief Executive Officer)

On behalf of the Executive Committee

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University of Northampton  
Students Union  
Park Campus  
Boughton Green Road  
Northampton  
NN2 7AL  
01604 892818



Response.  
14/3/2013.

## FAO Licensing:

There are a number of concerns regarding the on-going discussion over EMRO's. Northampton's night-time economy is in a precarious state, the wider economic conditions are providing considerable difficulty and uncertainty, and further uncertainty over possible regulation is unhelpful.

1. Different proposals regarding EMROs have been reported by different parties at different times. Is the council considering a definite proposal regarding EMROs? The council should urgently clarify whether/what restrictions are being sought or considered.
2. Will the council carry out a proper consultation, giving all interested parties a full opportunity to make representations?
3. Is there any evidence that EMROs will actually reduce the incidence of alcohol related disorder, or, indeed, make life any easier for the police? If there is no evidence that EMROs will solve the problems, then this should be given due weight. Specifically:
  - a. The whole point of 24-hour licensing was to allow venues to close at different times, which would naturally stagger the emptying of venues. This has been largely successful – venues that are open till 4am, for example, are rarely busy at closing time. Customers tend to drift out in small numbers from 2am onwards, so that at 4am there are few patrons being ejected simultaneously. Similarly, adjacent venues may already be closed by 4am, or may go on till later, providing for a much smaller number of people being ejected from venues in the same vicinity at the same time. If an EMRO forced all venues to close at the same time, then it is inevitably going to create a choke point with many people being ejected at the same time. Is there any evidence that problems would reduce if all the bars on Bridge Street ejected all their patrons simultaneously at 3am?
  - b. Another objection to earlier closing times is that of drinking up time. Many young people have a fixed budget for a night out. Earlier closing times may simply mean that they drink the same amount of alcohol, as dictated by their budget, but in a shorter time. This exacerbates drunkenness rather than alleviating it.
  - c. It might also be that EMROs simply move problems elsewhere. If early closing of bars causes people to adopt, for example, house parties as an alternative, this would be not only the final nail in the coffin of many licensed businesses, but could potentially mean that the police have to attend properties in residential areas all across Northampton to attend to disorder/nuisance issues, whereas everything is currently contained in one area. What would be the impact of this dispersal on police resources?
  - d. It is suggested that earlier closing times would encourage people to go out earlier. This is a wild assumption for which there is no evidence. Habits do not change easily. But, even if it were true, then, hypothetically, people would go out earlier, get drunk earlier, and still cause the same problems, only earlier. A choke point is a choke point, whether it is at 4am, 3am, or 2am.

4. Will the council give full consideration to the effects on the licensed businesses in any area where EMROs are being considered? The licensed trade is already in a precarious state. Most venues are surviving on their Saturday night business, with Fridays running at half capacity at best, and the rest of the week a total non-event; many people have reacted to the recession by restricting their nights out to Saturdays only. In this environment, EMROs will certainly damage Northampton's night-time economy. Further, this damage will be indiscriminate – it is quite possible that an EMRO would cause venue A to close down, when venue B next door was actually the one responsible for most of the problems. The Licensing Act already provides for taking action against venues where there are problems. EMROs will simply blanket bomb all venues in the affected area.
5. If EMROs are being considered for 'problem areas' such as Bridge Street, then will the council also consider likely knock-on effects, e.g. the impact on all the pubs on the Wellingborough road that benefit from trade from people who are making their way into town to Bridge Street?
6. If EMROs are being considered for 'problem areas', then will the council consider the likelihood that an EMRO in one area will simply move problems to a different area?
7. Indeed, it may well be that the problems of drunkenness and disorder are not LICENSING issues, but are in fact LAW ENFORCEMENT issues. No amount of action against licensed premises will solve disorder if law enforcement is not doing its share. As already noted, the Licensing Act allows the council to take action against problematic venues, and most venues go to great lengths (and expense) to maintain order. The council should consider alternative strategies *first*, before resorting to action which is likely to put well-run licensed businesses out of business. These might include:

a) Zero tolerance policing

I have witnessed a man across the street assault 2 people in the early hours, one of whom was a woman. Two police officers attended, spoke with the man, but took no further action. Once the officers had left the scene, the man proceeded to assault a doorman at the next venue down the street. This could and should have been avoided. The law is only ever a deterrent if action is taken against offenders, even if such action is limited to that person spending the night in a cell. I respectfully suggest, whilst acknowledging the severe constraints within which the police now have to work, that action against licensed businesses cannot possibly compensate for inadequate action by the police or courts. In short, tougher policing may be the better place to start.

b) Greater police support of door supervisors.

There is a widespread belief among door supervisors that the police love nothing more than to arrest a doorman. I have watched as my own doormen are harassed and threatened for up to an hour by a drunk person, showing great restraint all the while, and when police arrive at best they move the offender on. Conversely, as soon as a doorman does anything remotely controversial, the police seem suddenly very willing to seek a prosecution. As a result, door supervisors are unwilling to intervene in situations where common decency might dictate that they should, for fear of being

arrested and losing their licence. Greater co-operation and trust between police and door supervisors could therefore be very beneficial. After all, without door supervisors, the town really would have problems!

In summary, the imposition of EMROs is likely to have serious implications for many licenced businesses, including those which are well-run, and those outside of areas directly affected by the EMRO. It is also unclear that EMROs will ameliorate the problems which the council rightly seeks to address.

It is hoped that the council will take a considered approach to the issue, clarify its intentions, allow for proper consultation, look at all possible alternative strategies, and take into account all available evidence. The vast majority of licenced businesses already work willingly with the council and the police to deal with disorder, participating in Pubwatch and Best Bar None, among other things. It is reasonable to hope that, in return, the council will work sympathetically with these businesses.

Yours sincerely



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Urban Tiger

Bill Edwards

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From: [REDACTED]  
Sent: 05 April 2013 22:54  
To: Licensing  
Cc: [REDACTED]  
Subject: [REDACTED] ultation

Importance: High

Dear Sir/Madam

Thank you for letter of the 27<sup>th</sup> February requesting views of those bodies who have may have an interest in the potential introduction of an EMRO in Northampton.

JD Wetherspoon own and operate 3 premises in Northampton as follows:

The Cordwainer  
The Moon on the Square  
The East Gate

The premises employ over 120 people between them on a part time and full time basis and provide a significant amenity to those who use them either for food, drink or a combination of both from first thing in the morning to late at night.

In the absence of a detailed proposal for the EMRO both in its geographical extent, supporting evidence and when it would apply from, it is difficult to make a detailed response to the pre-consultation. On a point of general principle however we would oppose the introduction of any EMRO in Northampton for a number of reasons.

We are not aware that there are serious enough problems of crime and disorder in Northampton to justify the introduction of an EMRO. The s182 Guidance on EMROs requires a Licensing Authority who wishes to introduce an EMRO to have "sufficient evidence to demonstrate that its decision is appropriate for the promotion of the licensing objective". One would expect that if an EMRO was worthy of consideration that evidence would have manifested itself in concerns raised by the Police. If there are such concerns then they have not been raised with us directly as one of the most important operators within the town or collectively by any form of wider liaison with the operators of premises in the late night economy.

The s182 Guidance states that an EMRO is

"a powerful tool which will prevent licensed premises in the area to which the EMRO relates from supplying alcohol during the times at which the EMRO applies. The licensing authority should consider whether other measures may address the problems that they have identified as the basis for introducing an EMRO"

If problems have been identified, which is not clear at this stage, then consideration should be given to those other measures before an EMRO is formally considered. The town benefits from an active Pubwatch, a well organised Best Bar None and is policed by a force that has in general a positive relationship with the licensed trade and is therefore much better placed than other night time economies in having a structure for the type of partnership initiatives which would avoid the need for the "iron fist" approach of an EMRO. As a company we would fully support such an initiatives as we have done to date. The energy operators would have to expend on opposing an EMRO would be far more productively spent in this fashion.

Of course "other measures" do not simply mean partnership initiatives, as welcome as they are. The Licensing Act has supplied responsible authorities and local residents with a number of tools such as reviews, closure



orders etc. to bring errant operators who are not promoting the licensing objectives into line and where problems can be reasonably linked to individual premises, these tools must be used first. The advantage of such an approach is that it means responsible operators who do promote the licensing objectives are quite rightly left unaffected. Contrast this with the indiscriminate effect of an EMRO.

The economic effect of an EMRO should also be considered on both a premises specific basis and a collective basis. For a late night operator who has to curtail its hours, the introduction of an EMRO will have a fundamental effect on its business. The selling point of many night clubs for example is their ability to trade later than other premises. If this is lost and that operator has to close at the same time as many other operators in an already crowded market, then the likelihood of that business failing with a knock effect on jobs and the creation of another empty town centre premises is significant. Whilst an EMRO can force certain premises caught by its terms to close earlier, it cannot force those beyond its scope to do so and the differential in hours many late night operators rely upon from standard bars and pubs is lost. It is unrealistic and legally unenforceable to expect those bars and pubs to curtail their own hours to preserve the differential for their competitors and somehow preserve the late night economy in its present form but simply with earlier hours, as we understand the Police are seeking via the EMRO.

It is extrapolated that an EMRO will mean that customers who currently stay at home until late, often it is said pre-loading on alcohol bought from supermarkets, will be forced to come out earlier. This is not supported by any research and the danger is that they either simply not come out at all or alternatively go to a neighbouring town with a later late night economy. Given that Northampton's late night economy is economically struggling with a reduced footfall that is a significant risk to take. Many bars and pubs rely, especially on Fridays and Saturdays, on customers of the later night clubs for trade and with those night clubs either closed or curtailed in trading hours, such customers are likely to be lost with obvious economic impact.

We hope that the above submission is helpful. If there are issues which targeted enforcement in the town cannot target, then

the proper approach should be swift and open dialogue between all stakeholder to resolve those issues before any consideration is given to a formal EMRO consultation process and we urge that approach is taken.

If you wish to discuss any of the above with me further, please do not hesitate to contact me.

Regards

Solicitor  
Head of Legal  
JD Wetherspoon PLC

**Phillip Bayliss**

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**From:** [REDACTED]  
**Sent:** 18 March 2013 11:37  
**To:** Phillip Bayliss  
**Cc:** llcensing@northampton.gov.uk  
**Subject:** EMROs

Dear Mr Bayless

I appreciate your contact giving us the opportunity to make some observations regarding the possible implementation of EMROs in our area. Please see my comments below.

- I am particularly concerned about the Abington Square area and where it connects to Kettering Rd and Wellingborough Rd.
- In addition we would be supportive of EMROs in any area of the town where residential and licensed premises coexist.
- licensed premises in Abington Square and connected streets cause severe noise disruption and inconvenience to the local domestic residents. Loud noise - particularly on Friday through Sunday evenings - from music played within the premises, loud noise from shouted conversations and arguments - often resulting in scuffles or fights - on the streets outside the premises.
- The premises involved include but are not exclusive to, The Bootleggers Liquor Bar, Penny Whistle Pub and Com Chop licensed Cafe.
- Residents often from bed sitter type accommodation find it almost impossible to get to sleep before the early hours of the morning during the Friday to Sunday evening window - sometimes earlier in the week from the Penny Whistle Pub.
- I would recommend a ban on the sale of Alcohol after 10.30pm which would contribute positively to quality of residents lives in this area- which include members of our congregation who live in or nearby the area.

It is my prayer and wish that the consultation will result in some positive action being taken.

Rev

On behalf the members and friends of All Nations Church)



A S P E R S

28<sup>th</sup> March 2013

The Licensing Department  
Northampton Borough Council  
The Guildhall  
St Giles Square  
Northampton. NN1 1DE

Dear Sir/Madam.

I am writing to you in response to your letter dated 27<sup>th</sup> February whereby you are seeking the initial views on Northampton Borough Council introducing an Early Morning Restriction Order (EMRO).

I believe that the unilateral application of an EMRO would be unfair to licensed premises holders who operate safe, secure and well managed premises and who work with local authorities and the police to provide a quality offering within a safe environment with appropriate policies and procedures for the responsible service of alcohol.

Aspers have concerns that all sectors of the "late-night" economy are tarred with the same brush and believe there should be a differentiation between those who operate premises where the primary activity is the sale and consumption of alcohol and which may give rise to problems, and those who operate other venues such as casinos, where the sale and consumption of alcohol is ancillary to the premises primary purpose.

Aspers fully supports the responsible service of alcohol and the four licensing objectives of the Licensing Act 2003. Aspers Casino in Northampton is not a "late night" drinking venue but a casino where a Patron can enjoy the facilities on offer in a socially responsible atmosphere.

The proposal to introduce an EMRO and restrict the sale of alcohol for any specified period between 12am and 6am would be detrimental to Aspers business and have a financial impact on the casino and may result in loss of employment and loss of substantial revenue to the Treasury from gaming duty.

We would be more than happy to meet with you and discuss the policies and procedures we have in place to ensure compliance with the Licensing Act 2003.

Yours sincerely,

  
Aspers Group Compliance Manager

ASPERS GROUP LIMITED 1 HANS STREET LONDON SW1X 0JD T: +44 (0)20 7235 2768 F: +44 (0)20 7235 7336

REGISTERED OFFICE AS ABOVE COMPANY No. 05261538



NEWCASTLE • SWANSEA • NORTHAMPTON • STRATFORD CITY

**Bill Edwards**

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**From:** [REDACTED]  
**Sent:** 29 March 2013 16:14  
**To:** Licensing  
**Subject:** EMRO Consultation

The Licensing Department  
Northampton Borough Council  
The Guildhall  
St Giles Square  
Northampton NN1 1DE

Re EMRO

Dear Sir/Madam

I operate 2 bars in the town centre and would broadly welcome a return to sensible operating times as existed before the 2003 act.

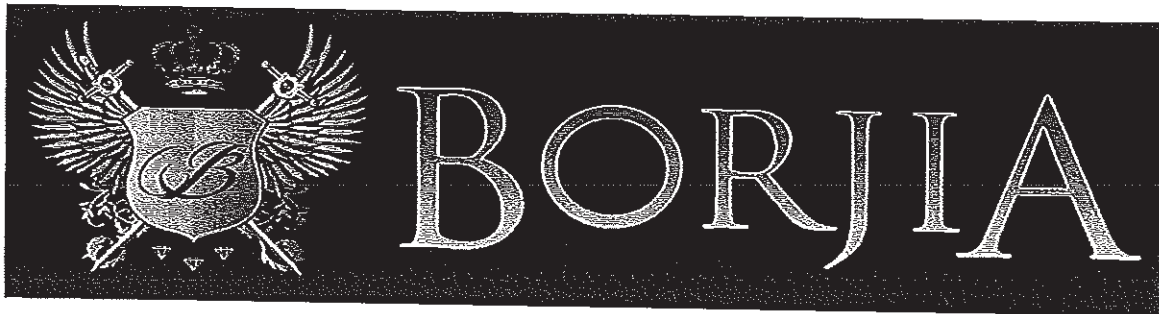
During this time day time operators closed down by midnight and the late trade by 3am in general, this appeared to accommodate all concerned.

~~It must surely make economical sense during these difficult times for operators and the local authority if bars and clubs trade on a level playing field over a shorter time period and in a more concentrated area thus allowing police resources to be targeted more effectively.~~

I'm sure we can all agree that we need to change the current culture of the young who are now growing up and think it is normal to drink large amounts of cheap supermarket alcohol at home and then arrive into the town at midnight worst for wear and party till 6am. By adopting a EMRO we might and its only a might be able to start reversing some aspects of the present behaviour exhibited .

I had a meeting with the Police and it is quite clear from there remarks that they are unable to take control of the streets as they would wish as their resources are inadequate for the present job. When you consider approximately 200 door supervisors control the bars of Northampton and 15 Police officers are expected to maintain law and order in the this town and Kettering if required, its clear to people on the front line Police, supervisors and bar staff that we need to find a better way forward.

Director  
BarSo/Balloon Bar



*Response*  
*14/3/13*

17a Castilian Street  
Northampton  
NN1 1JT

01604 637555  
info@borjia.co.uk

Louise Faulkner  
Licencing Department  
Northampton Borough Council  
The Guildhall  
St. Giles Square  
Northampton  
NN1 1DE

**BY EMAIL:** [lfaulkner@northampton.gov.uk](mailto:lfaulkner@northampton.gov.uk)

Date: 28<sup>th</sup> February 2013

Dear Louise,

**RE: Early Morning Restriction Orders ("EMROS")**

There have been various representations in the paper recently and also at several of the recent Pub Watch meetings that Early Morning Restrictions Orders are being considered.

I would ask that you clarify whether there is a current proposal and if so, what the current proposal is, given that there has been a number of disjointed representations as to the restriction that is being sought. Last week, the radio was referring to a midnight restriction, whereas the Chronicle & Echo are suggesting either 2:00 am or 3:00 am restrictions and at the Pub Watch meetings a 3:00 am restriction has been suggested.

I am very conscious that certain publicans have been spoken to. I am not sure, in my view, that those that have been spoken to have actually fully and properly



detailed the thoughts, fears and concerns of the majority.

I enclose a copy of a note that I have prepared which details Borjia's thoughts and representations. There are a number of reasons why I do not consider that EMROs are appropriate.

I am not sure whether we are now within the 42 representation period. That is something that I would ask that you clarify.

If we are, I would ask that this letter is treated as appropriate representations on behalf of Borjia objecting to the proposal for the reasons set out in Borjia's note of representations.

I would ask that you revert to me at your earliest convenience.

Many thanks.

Yours sincerely,

.....  
.....  
.....  
**Director**



Note of Concerns and Representations Regarding  
Early Morning Restriction Orders  
(EMRO'S)

1. It is considered that proper representations need to be made given, to date, those asked for views on EMRO's have not had time to give a thought out response.
2. Speakers and those asking and/or answering questions should always have structure and regard to what they are saying and the implications of what they are saying and how it may be interpreted.
3. We should seek clarity on the restrictions sought, given the BBC has stated a midnight restriction is being sought and local papers are suggesting that it only applies to crime areas and that restriction sought is either 2:00 am or 3:00 am. At Pub Watch meetings it has been suggested that the restriction sought is 3:00 am.
4. It also needs to be clarified whether if EMRO's are implemented with a 3:00 am restriction whether that would be a starting point for further restrictions being implemented at a later date.
5. There should be clarity on whether if EMRO's are affected whether:
  - 5.1 It would truly reduce incidents or move them elsewhere, which would have the affect of spreading the blue line further and creating incidents at house parties or rekindle the rave problem that used to exist. It is considered that the police and licencing authority would not be able to properly or effectively police house parties or raves.
  - 5.2 It would cause an influx of drinkers leaving licenced premises at the same time causing greater risk of disturbance and violence problems with differing groups and drinkers from different bars clashing in the street at the same time. I believe that this problem was one of the underlying reasons why the licencing restrictions were removed in the Licencing Act 2003, coupled with extending the

period in which drinkers consumed their drinks as opposed to them consuming their drinking quota in a shorter period. There is no evidence that drinkers will drink less. That, in effect, means that they will either drink more in a shorter period which would be likely to create greater problems earlier on in the evening than currently exists, or carrying on their drinking elsewhere.

6. The affect that such changes would have on bars also needs to be very carefully considered. It is suggested by those seeking the restriction that it will encourage drinkers to come out earlier. There is no evidence that that will happen and I believe the general view is that drinkers will not change their routines and habits overnight and more likely not at all.

If the drinkers did not change their habits and they did not decide to have house parties or drink in other unlicensed circumstances it is likely that those drinkers would start drinking out of town in other towns where the restriction does not apply causing a direct knock on loss of business for licensed premises in Northampton.

It is thought by some of the publicans that EMRO's will not affect their business has the restriction does not affect their trading hours. In the converse, it will cause a knock on affect if those drinkers decided to drink elsewhere. By way of example, those licensed premises on the Wellingborough Road which are traditionally the pubs that people stop off at on the way into town would also suffer if potential customers were not making their way into town and had left town completely and go elsewhere.

7. The newspaper articles and adverse publicity seem to be suggesting that the EMRO's would only be affected in what is referred to as the "crime" areas. There is no suggestion that I have heard at any of the Pub Watch meetings that there would be such a restriction and that the EMRO restriction would apply to all licensed premises, not only those in the directly affected areas. It would not, in any event, make sense to impose EMRO's in one particular area, given that the problem would merely move from one area to another.
8. Those seeking to impose the EMRO should seriously consider whether or not they do believe that there would be an influx in drinking in unlicensed premises which the police and Licencing Authorities and also the publicans are not able to police. If they are not policed by the publicans themselves that would be likely to give rise to not only enhanced drinking problems but also enhanced drug related problems. At present, the publicans deter dealers. That deterrent would not be present in an unlicensed environment.

9. There is also some suggestion that no respectable person would want to be drinking in the early hours of the morning. That view is completely unsubstantiated. Many respectable people decide for various reasons to drink in the early hours including those that finish work late including bar and restaurants, owners and staff that are not able to go out and socialize themselves until the early hours.
10. The affect of EMRO's on some businesses will be damming and will, without doubt, cause those businesses to close. Licenced premises are wholly dependant upon their Friday and Saturday night trade. In many cases trade does not start until around 11:00 pm. That would cause a significant reduction in takings.
11. The reduction in takings would, in turn, have a significant knock on affect on reassessment of business rates, given that for licenced premises the business rates seem, at present, to be based on turnover. It does need to be appreciated that the business rates for licenced premises are very high compared to retailers and other businesses. The ratable value of the bars in Bridge Street alone equate to £272,500.00 per year. This figure does not include Fat Cats or Revolution.
12. It does seem prior to putting some publicans out of business completely that alternative considerations need to be fully and properly considered and also (if considered appropriate) implemented, including a zero tolerance policy. If the police operated a zero tolerance policy that would make the job of the publicans also easier and also that of the door staff who, I believe, do their utmost to avoid drunken customers from entering their premises.
13. For all of the reasons that the licencing restrictions were removed in the first place, similarly, endorses why EMRO's are not now appropriate.
14. A freedom of information request has been submitted for police statistics, both prior to the licencing regime being implemented and also since.
15. The ability of EMRO's to be implemented does also need to be fully considered and the process and the legitimacy of such orders.

From: [REDACTED]  
Sent: 14 March 2013 09:50  
To: communications@northampton.gov.uk  
Cc: [REDACTED]  
Subject: Views on possible restrictions for licensing sought

In response to the above I feel that I must raise my concerns as Vice Chair of Double H Residents Association and Representing Cowper Street.

----

I take a distance from St. Michaels Road to Hood Street ( a distance of 0.4miles) there are 69units 26 of these are related to Retail Food i.e. a ratio of 1 in 2.65

In the section from Cowper Street to Hood Street (west side) the ratio is 1 in 1.45

We have drug dealing in door ways on the nearby residential streets.

Girls from the Massage Parlour standing on again residential street corners.

Take away/ eat in establishments - doors can be open till 04.00hrs but the clients might not leave until 05.00hrs

Shops selling alcohol being open until 02.46hrs - advertised - but the customers might not leave the premises until 03.30hrs - some of these establishments re-open at 06.00hrs

ALL OF THE ABOVE HAVE CONSEQUENCES / RAMIFICATIONS

The area is a magnet for all types of people together with the mobile disco's, mobile phones, shouting, car horns being sounded, car engine being started and / or revved, car doors being slammed. There is also sporadic fighting in the near area. At times the entrance to Cowper Street is blocked by the number of people standing around - this is a one way street.. This also very frightening for anyone whether they are in pairs or even walking on their own after 21.00hrs.

Then the overspill from all this degradation!

There is the VOMIT. Doorways to residential property being used as urinals, shouting, windows being bashed but not broken (again resulting in disturbed sleep in more ways than one) and then there is the unwanted litter and in warmer months the smell and the flies from this 'mess'

There have been several muggings during the day - one can only assume this is to obtain money - over the past six months.

MEANWHILE the RESIDENTS who have invested in the area are having sleepless nights, rats, pigeons broken bottles, empty bottles, cans and the general appearance becoming very shabby and demeaning.

Just a note The Picturedrome (a licensed property) does have a restricted alcohol / entertainment licence.

Vice Chair  
Double H Residents Association

Please acknowledge receipt of this.

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**Bill Edwards**

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**From:** Duston Parish Council <admin@dustonparish.org.uk>  
**Sent:** 05 April 2013 11:59  
**To:** Licensing  
**Subject:** Early Morning Restriction Order

Duston Parish Council met last night and wish to make the following comment regarding the Early Morning Restriction Order.

*"The Early Morning Restriction Order should be for the whole of the Northampton Borough to prevention the risk of displacement behaviour".*

Regards

Acting Deputy Clerk

DUSTON PARISH COUNCIL  
Duston Community Centre  
Pendle Road  
Duston  
Northampton NN5 6DT  
Tel: 01604 583626  
Email: [admin@dustonparish.org.uk](mailto:admin@dustonparish.org.uk)  
Website: [www.dustonparish.org.uk](http://www.dustonparish.org.uk)



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# DW SOLICITORS

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262a Wellingborough Road, Northampton NN1 4E

Licensing, Licensing Committee & Councillors

Tel: 01604 624 222 Fax: 01604 601123  
Email: [info@dwsolicitors.com](mailto:info@dwsolicitors.com)

Date: 1<sup>st</sup> May 2013

[www.dwsolicitors.com](http://www.dwsolicitors.com)

Dear Sirs,

**RE: EMROs and the Closing Down of Northampton**

This representation is submitted on behalf of those licensed premises set out in the Schedule.

We would ask that the following is taken into account in considering whether a consultation on EMROs is necessary and/or appropriate:-

- Prior to EMROs being implemented all other possible alternatives need to be considered.
- EMROs can only be validly issued if it enhances the licensing objective.

**Alternatives**

- The alternatives which have yet to be considered would include:
  - 1 The Ipswich Scheme
  - 2 The introduction of custody suites
  - 3 Stiffer penalties being imposed upon offenders.
  - 4 Zero tolerance principle being applied by both police and licensed premises.
  - 5 Greater police support of door supervisors.
  - 6 Tougher policing. Football violence was a much larger problem and was resolved by tough policing.

### Licensing Objective

- Is there a problem?
- No suggestion of a problem at Pub Watch meetings prior to the suggestion of implementation of EMROs.
- Extensive research carried out prior to the Licensing Act 2003 being implemented (including a Green Paper) which supported extended hours.
- The green paper stated that staggered hours promoted the licensing objective.
- Staggered hours reduces crime.
- Extended drinking hours encourages drinkers to leave licensed premises and go straight home as opposed to hanging around the streets and seeking to party elsewhere.
- Staggered hours avoids an influx of drinkers onto the street all at one time.
- Staggered hours encourages drinkers to spread their drinking over an extended period.
- BIIAB clearly states that a flexible framework for drinking establishments is a pre requisite to achieving the licensing objective.
- Staggered hours avoids drinkers being forced onto the street before they are ready to go home.
- Staggered hours deters drinkers from having parties or gatherings in unlicensed venues.

### Avoiding Nuisance and Violent Disorder

- Enhanced drinking hours in licensed premises reduces crime and nuisance.
- It avoids potential for nuisance being caused in residential areas.
- It avoids drinkers from having house parties or gatherings in unlicensed venues.
- It enables police to properly police those areas where it is known that there may be a problem.
- Drinking in unlicensed establishments or house parties will increase the need for police resources and stretch those resources to a much wider geographical area.
- The police would not be able to police house parties or unlicensed venues to avoid nuisance and violent disorder type problems occurring prior to them occurring.
- Better to police drinking in licensed premises.

### Protecting Children from Harm

- Children will be far greater at risk if drinking is occurring in unlicensed premises.
- Children will be at far greater risk if drinkers are forced to consume their drink in a shorter period.

- Children will be at far greater risk if there is likelihood of nuisance and violent disorder in the early part of the evening.

**Children will be at risk if EMROs were implemented, given the financial implications.**

- Reduction in hours will result in a loss of employment.
- Reduction in hours will force a number of premises to close.
- Restrictions, if implemented, would discourage university students from studying in Northampton.
- The loss of university students in Northampton would have a knock on affect on businesses, the rental market, property prices and the amount of money in circulation generally.
- A restriction would encourage customers to drink elsewhere.
- Customers drinking elsewhere will have a knock on affect, not only on the licensed premises, but also on taxis, hotels, shops, restaurants, take aways and business generally.
- The adverse affect on business would have a knock on affect on business rates, council tax and the loss of taxable income.
- The loss of these revenues will have a knock on affect on available budgets, potentially resulting in further job losses.
- The loss of jobs and/or the reduction in working hours will have a knock on affect on the income of children's parents. That would have adverse affects on the welfare of the children.
- The adverse affect on revenue and budgets would also be likely to have an adverse affect on children as a consequence of potential reduction in services.

Northampton Pub Watch has a very good rapport with the police. Alternative considerations have yet to be considered, or even put to Pub Watch. **We have not reached the point of last resort.**

It is not considered that EMROs can legally be implemented. That position has been accepted in Hartlepool and Blackpool.

We would ask, as opposed to a consultation being considered on EMROs, a consultation is commenced on alternatives, if it is considered there is a problem that needs addressing. This is more likely to achieve the licensing objective than curtailing the leisure activities of a large number of the law – abiding voting public.

Yours faithfully,

**DW Solicitors**



# Equality Impact Assessment

## Part 1: Screening

When reviewing, planning or providing services Northampton Borough Council needs to assess the impacts on people. Both residents and staff, of how it works - or is planning to – work (in relation to things like disability). It has to take steps to remove/minimise any harm it identifies. It has to help people to participate in its services and public life. “**Equality Impact Assessments**” (EIAs) prompt people to think things through, considering people’s different needs in relation to the law on equalities. The first stage of the process is known as ‘screening’ and is used to come to a decision about whether and why further analysis is – or is not – required. EIAs are published in line with transparency requirements.

A helpful guide to equalities law is available at: [www.northampton.gov.uk/equality](http://www.northampton.gov.uk/equality). A few notes about the laws that need to be considered are included at the end of this document. Helpful questions are provided as prompts throughout the form.

<b>1 Name of policy/activity/project/practice</b>	This is: New policy/activity/practice Early Morning Restriction Order (EMRO)
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<b>2. Screening undertaken (please complete as appropriate)</b>	
Director or Head of Service	Steve Elsey
Lead Officer for developing the policy/activity/practice	Louise Faulkner
Other people involved in the screening (this may be people who work for NBC or a related service or people outside NBC)	Bill Edwards

<p><b>3. Brief description of policy/activity/project/practice: including its main purpose, aims, objectives and projected outcomes, and how these fit in with the wider aims of the organisation.</b></p> <p><b>Please explain:</b> The Police Reform And Social Responsibility Act 2011 introduced powers for local Authorities to apply for an EMRO which subject to consultation and adoption by the authority allows for a restriction on the sale and supply of alcohol in a designated area on specified days between midnight and six am. The purpose of the EMRO is to promote the four licensing objectives of: The prevention of Crime and Disorder, Public Nuisance, Public Safety and Protecting children from harm. This fits in with the corporate priority of safer cleaner neighbourhoods.</p> <p>Currently, evidence is being obtained as to whether an EMRO is justified in Northampton and to determine the specific area and times the EMRO should include.</p> <p>While there has been a reduction in violent incidents in the Borough overall, the reduction in the Town Centre and associated night time economy areas have not reflected the same reduction with data showing peaks of violence associated with late night opening after 3am. The aim of the EMRO is to reduce violence incidents in these areas in line with the rest of Northampton.</p>
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#### 4 Relevance to Equality and Diversity Duties

Is it linked to NBC's Equality Strategy ("Our Approach to Equalities")? NBC's Public Sector Duties? Equality Framework for Local Government Criteria? Service or departmental equality priorities? (all of these can be found at [www.northampton.gov.uk/equality](http://www.northampton.gov.uk/equality))

**Please explain:** As a key partner of the Northampton Community Safety Partnership NBC are working to reduce Alcohol related violence and it is seen that the EMRO is a tool which can assist in the Partnership achieving its target.

By reducing violence incidents with the introduction of an EMRO we believe we are making Northampton a safer place for all groups and individuals and therefore removing opportunities for potential discriminatory or hate motivated incidents that can be fuelled by the improper use of alcohol.

We do not feel at this stage, or foresee any impingement on any groups with protected characteristics in relation to their equality of opportunity.

Any EMRO that is introduced will only restrict the sale of alcohol in a designated area in the early hours of the morning. We do not believe any groups will be impacted negatively.

#### 5 Evidence Base for Screening

List the evidence sources you have used to make this assessment (i.e. the *known evidence*) (e.g. Index of Multiple Deprivation, workforce data, population statistics, any relevant reports, customer surveys, equality monitoring data for the service area.)

There is no evidence to suggest that any particular group will be negatively impacted upon by a restriction in the sale of alcohol in the early hours of the morning. However, we are aware that a restriction to sales may have an impact upon the revenue of those establishments which could have implications for staff who work during those hours. The restriction does not impact on the other licensable activities at the premises, or the opening hours. So, there is potential for these premises to look at alternative avenues for generating revenue at those times.

Are there any significant gaps in the known evidence base? If so what are your recommendations for how and by when those gaps will be filled?

Prior to any EMRO being introduced a full consultation exercise will be undertaken. This will allow us to review our assessment based on the feedback received. We will then be in a better position to implement any initiatives to redress any identified or potential negative impact on any particular group.

## 6 Requirements of the equality duties:

(remember there's a note to remind you what they are at the end of this form and more detailed information at [www.northampton.gov.uk/equality](http://www.northampton.gov.uk/equality))

Will there be/has there been consultation with all interested parties?

**Yes**

**Please explain:** There has been an initial informal consultation exercise undertaken with premises licence holders and members of the public in general. There were 44 responses. This was seeking the general views of the public and interested parties. None of the responses identified any potential for a negative impact on groups with protected characteristics, but as stated above there were concerns in relation to potential loss of revenue resulting in closure/job losses. A full consultation will commence if the licensing Committee approve the application when it is submitted to them for consideration.

Are proposed actions necessary and proportionate to the desired outcomes?

**Yes**

**Please explain:** The number of premises affected by the EMRO is minimal. The premises can remain open and provide other activities or entertainment. Alcohol related violence is a priority for the Community safety partnership and is a key concern of the residents of Northampton. We aim to make Northampton a safer place and a key measure is the actual and perceived nature of its town centre and what happens within its night time economy. We believe that the steps are appropriate and balance the requirement to maintain a vibrant night time economy and increasing its safety for those who use it.

Where appropriate, will there be scope for prompt, independent reviews and appeals against decisions arising from the proposed policy/practice/activity?

**Yes** Prior to the adoption of an EMRO full consultation must take place. If there are relevant objections then a hearing will be held for those objections to be considered. If upheld then the EMRO must be amended accordingly.

Does the proposed policy/practice/activity have the ability to be tailored to fit different individual circumstances?

The proposed EMRO will be tailored to reflect the areas of the Town where the issues of alcohol related violence are of most concern.

Where appropriate, can the policy/practice/activity exceed the minimum legal equality and human rights requirements, rather than merely complying with them?

**Yes**

**No N/A**

**Please explain:**

**From the evidence you have and strategic thinking, what are the key risks (the harm or 'adverse impacts') and opportunities (benefits and opportunities to promote equality) this policy/practice/activity might present?**

	Risks (Negative)	Opportunities (Positive)
Race	None identified at this stage	A safer place
Disability	None identified at this stage	A safer place
Gender or Gender Identity/Gender Assignment	None identified at this stage	A safer place
Pregnancy and Maternity (including breastfeeding)	None identified at this stage	A safer place
Sexual Orientation	None identified at this stage	A safer place
Age (including children, youth, midlife and older people)	None identified at this stage	A safer place
Religion, Faith and Belief	None identified at this stage	A safer place
Human Rights	None identified at this stage	A safer place

**7 Proportionality**

Describe the scale and likelihood of these risks and opportunities

No risk identified at this stage.

**8 Decision**

Equality concerns arising during prospective further consultation will be duly considered