

# West Suffolk Council Bury St Edmunds Cumulative Impact Review: Consultation Survey Summary

## Background

1. Public consultation took place between 6 July and 24 August 2020 on the review of the Bury St Edmunds Alcohol licensing Cumulative Impact Area (CIA).
2. Local authorities are required to produce a Statement of Licensing Policy under Section 5 of the Licensing Act 2003. The aim of West Suffolk's licensing policy is to ensure that the four licensing objectives are met:
  - Reducing crime and disorder
  - The prevention of public nuisance
  - The protection of children from harm
  - Promoting public safety.
3. Cumulative impact policies were introduced as a tool for licensing authorities to manage the growth of licensed premises in an area where the number, type and density of premises selling alcohol could lead to nuisance, disorder or public safety issues.
4. On 6 April 2018 section 5A of the Licensing Act 2003 came into force. This section permits a Licensing Authority to publish a "Cumulative Impact Assessment" stating that the licensing authority considers that granting more premises licenses and club premises certificates in one or more areas would have a negative impact on the area, and conflict with the local licensing objectives. As Cumulative Impact policies (CIPs) were not part of the licensing act, there are no transitional provisions that apply to CIPs that were in place before 6 April 2018.
5. The existing policy requires reviewing to ensure it complies with the legislation. The major legislative change is the need for not only a full consultation to implement the CIA, but a new requirement to review the it every three years (commencing with its publication or revision), including a full consultation.
6. The current Cumulative Impact Policy covering key areas of Bury St Edmunds town centre was adopted by the council in 2014. The current policy has been in place since 2017 and it is time to review it, to see whether it is effective and whether the area covered should be changed.
7. In reviewing the CIA, the council will be taking into consideration:
  - local crime and disorder statistics, including statistics on specific types of crime and crime hotspots such as antisocial behaviour offences

- health-related statistics such as alcohol-related emergency attendances and hospital admissions
  - environmental health complaints, particularly in relation to litter and noise
  - evidence obtained through local consultation.
8. The council is required to review the Bury St Edmunds CIA by the end of 2020 in consultation with stakeholders and residents. If the decision is not taken to renew, the CIA will be automatically removed.

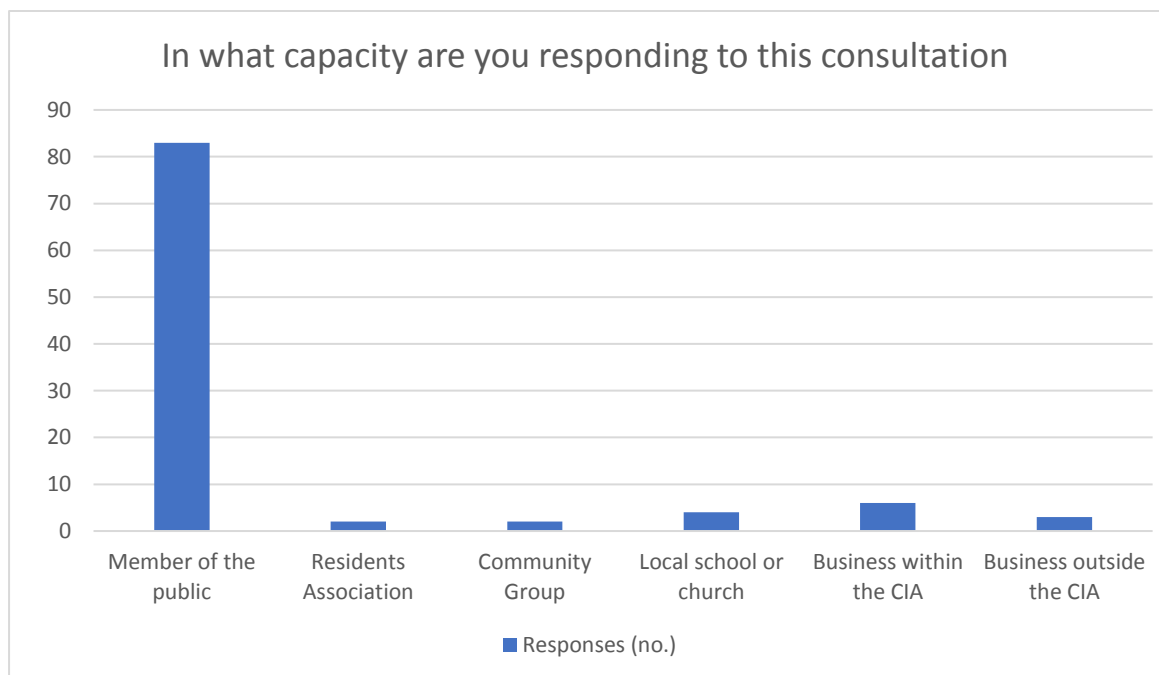
### Methodology

9. During the consultation period, views were sought from the public, residents' associations and other community groups or organisations within the Bury St Edmunds area regarding the intention to renew the CIA, as well as potential minor changes to the area covered.
10. Businesses and licensees from both within and outside the current CIA were also engaged. Businesses were specifically asked whether the CIA had any known positive or negative impact on their ability to undertake their work.
11. An online response form was created, and this was published through media, website, social media, councillors, staff and partner organisations, such as the Bury St Edmunds BID.
12. In addition, businesses were further engaged through direct emails to licensees and through personal visits by officers between 30 July and 19 August. Between 18 and 21 August, Bury St Edmunds community organisations, such as local churches and charities, were also engaged via direct email messages.
13. At the time the consultation closed, 100 online forms had been completed. This report outlines the results from the analysis of quantitative data and themes that can be drawn from the qualitative (free text) data.
14. Section 1 of this report outlines the type of respondents who took part. Sections 2 and 3 outline the specific survey results regarding whether the council should keep the CIA in place, the particular response from businesses and licensees, and comments on areas that could be added or removed from the CIA.
15. Please note:
- All questions are listed thematically to highlight the key findings of the consultation – namely whether there was agreement to retain the CIA in Bury; the particular response from businesses; and any additional information or suggested areas to add or remove from the CIA
  - A large part of the survey was made up of free text responses. These have been analysed using standard manual techniques for free text

- analysis, which while highly effective are unable to fully eliminate any degree of judgement or subjectivity
- Many free text responses mention street drinking. It should be explicitly noted that while street drinking and antisocial behaviour can be synonymous, the purpose of the CIA is not to reduce street drinking.

## **Section 1: About the respondents**

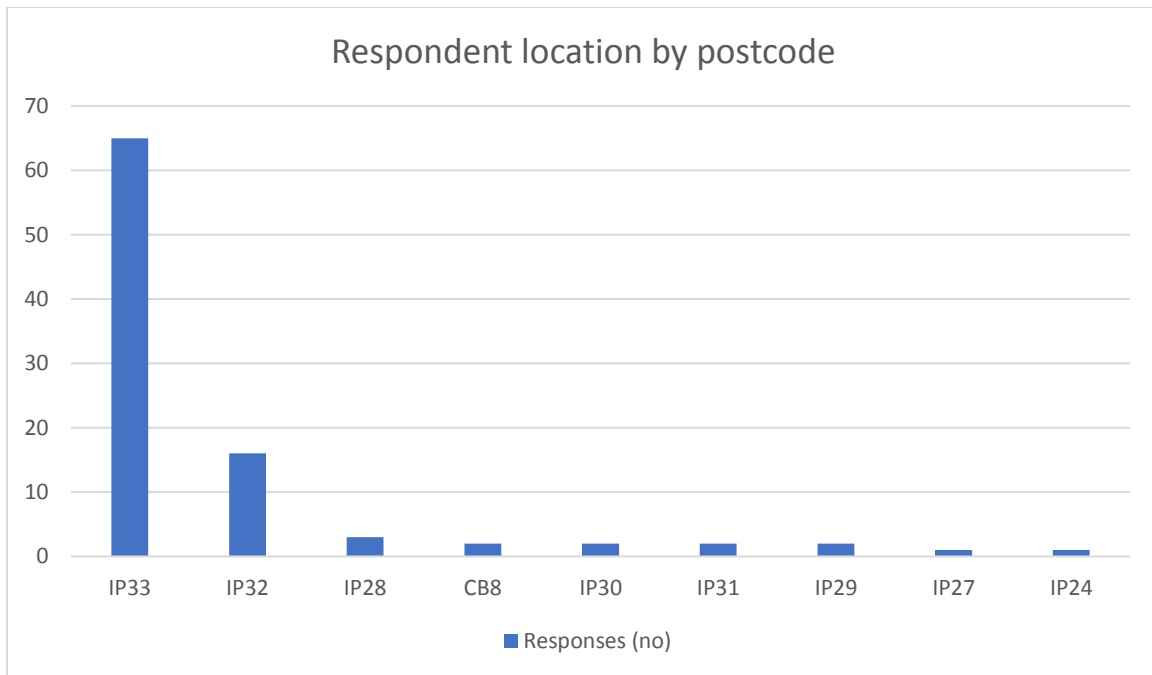
16. Of a total 100 respondents that responded online, the largest group of respondents were members of the public (83 per cent). 9 per cent responded to the survey as representatives of businesses. Of this number, the highest proportion identified as businesses situated within the current CIA in Bury (6 per cent). A further 8 per cent of respondents identified as representing local non-business organisation – local church or schools (4 per cent); community groups (2 per cent); and residents associations (2 per cent).



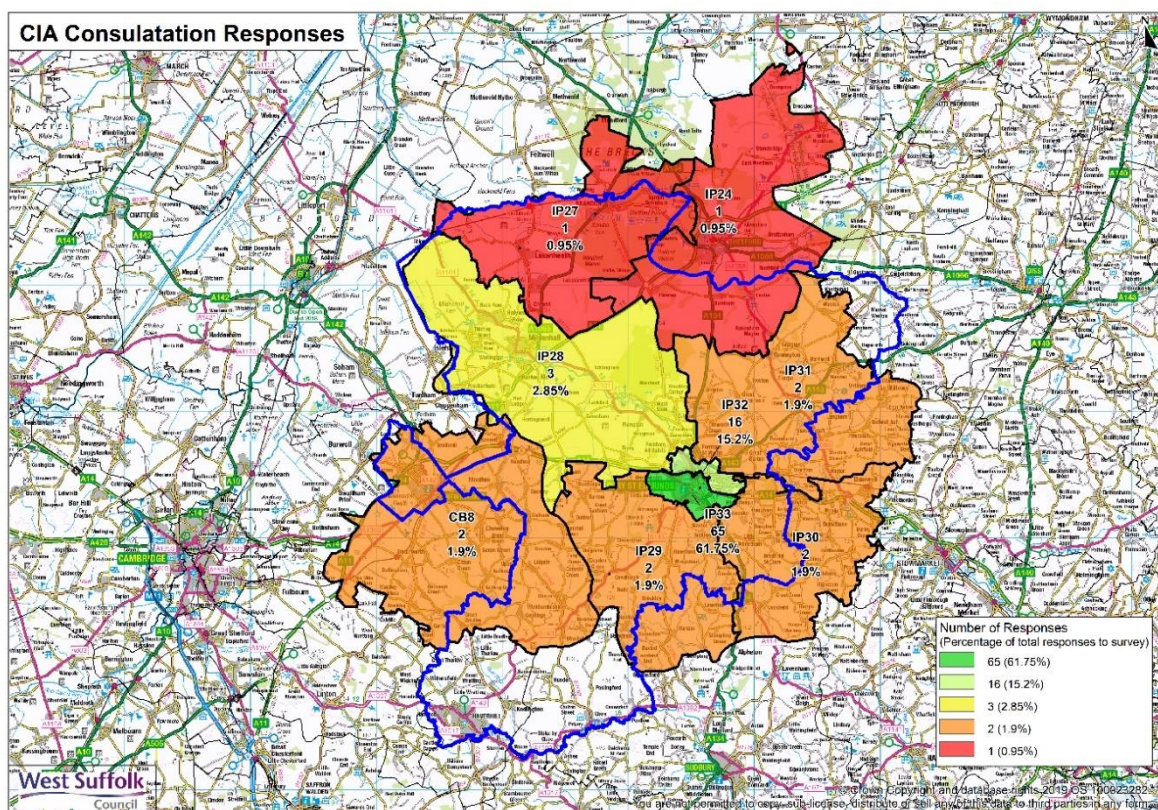
(The graph shows the majority of respondents were members of the public)

## **Respondent location**

17. 100 per cent of respondents are residents of West Suffolk. 90 of 94 complete responses (95.7 per cent) show that most respondents lived in Bury St Edmunds (IP32-33) or among the villages on the outskirts of the town (IP28-IP29-IP30-IP31). Two respondents were from the Thetford-Brandon area (IP24-IP27) and two respondents were from Newmarket (CB8).



(Graph shows that all respondents came from West Suffolk, with the majority from the IP33 and IP32 postcodes.)



(The image presents a map that highlights that the majority of respondents were from the Bury St Edmunds area)

**Gender**

18. The survey was completed by an equal number of males and females, with representatives of both genders each accounting for 46.9 per cent of respondents (46 respondents). Of the remaining respondents, three disclosed that they would “Prefer not to say” and a further three answered “Other” – with one specifying that there were of mixed gender.

**Age and health-disability**

19. The age breakdown (see chart below) shows a larger proportion of older people completed the survey; ages 35 to 70+ represents nearly 80 per cent of the total. There is no representation from those aged under 18 and very few 18-24-year olds responding to the survey. 9.5 per cent of respondents also stated that they had a longstanding disability, illness or infirmity, which is below the Suffolk average of 18 per cent.

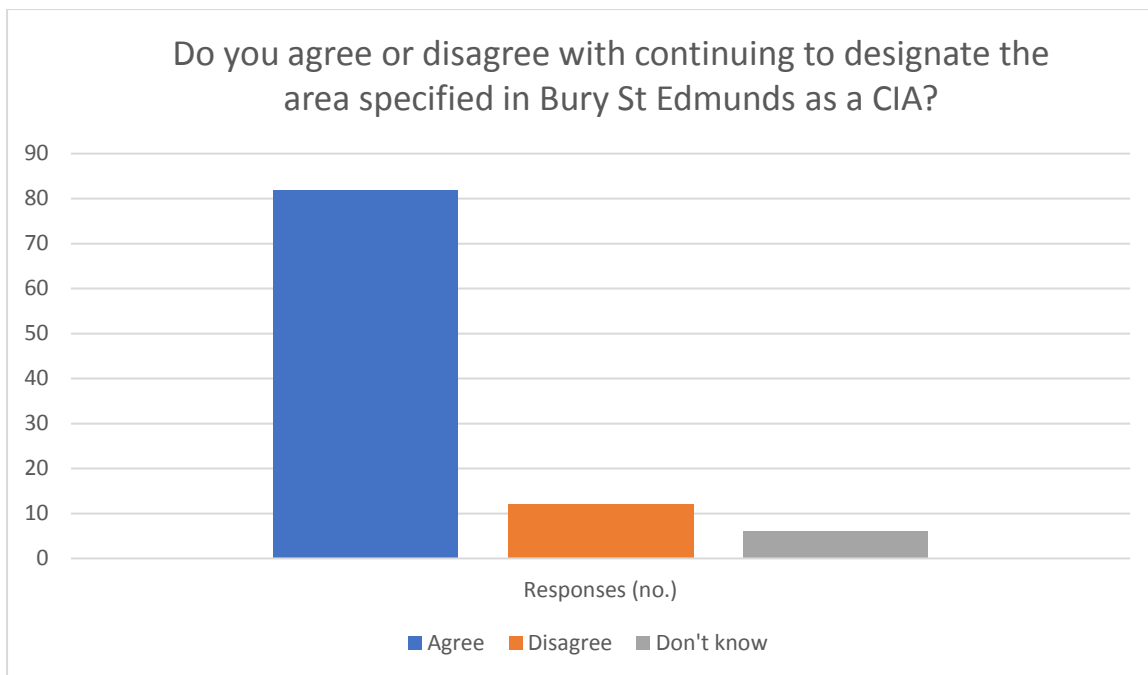
(Taken from 2011 Census data – Day to Day activities: 10.1 per cent limited a little; 7.9 per cent limited a lot)

<b>Age breakdown of respondents</b>		
<b>Age categories</b>	<b>% in each category</b>	<b>West Suffolk % (2018)</b>
<b>0-17</b>	0	21.1
<b>18-24</b>	2.1	7.7
<b>25-34</b>	6.3	13.8
<b>35-44</b>	13.7	11.5
<b>45-59</b>	24.2	19.5
<b>60-69</b>	30.5	10.9
<b>70+</b>	23.2	15.5

**Section 2: Question 6**

**Do you agree or disagree with continuing to designate the area specified in Bury St Edmunds as a CIA?**

20. Question 6 seeks to gauge whether there is agreement to continuing the Cumulative Impact Area in Bury St Edmunds. Of 100 responses, 82 (82 per cent) agreed to continuing the CIA. 12 (12 per cent) answered that they disagreed and 6 (6 per cent) responded that they did not know.



(Graph shows that the majority of respondents agree with continuing the CIA in Bury St Edmunds)

21. 68 respondents who were members of the public (81.9 per cent) and eight respondents representing a community organisation (100 per cent) agreed to the CIA. Six businesses (66.7 per cent) also agreed. These figures were reinforced with 40 respondents providing a free text reason for their answer; twelve comments indicated that respondents felt the CIA has already helped to lower street drinking and antisocial behaviour (ASB) in the town. However, others stated that they think that ASB is increasing in Bury and that further licensing and the impact of local development need to be considered carefully in relation to this.

Comments - Agree	Frequency of inclusion
CIA helps to minimise street drinking and ASB	12
It is important to maintain public order and reduce public disturbances, ASB	10
ASB is increasing	5
Binge drinking is off-putting to tourists and locals and negatively impacts the town	2
Any further proliferation of licenced premises needs to be considered carefully and may negatively impact the town	2
New builds mean the need for the CIA is increasing	2

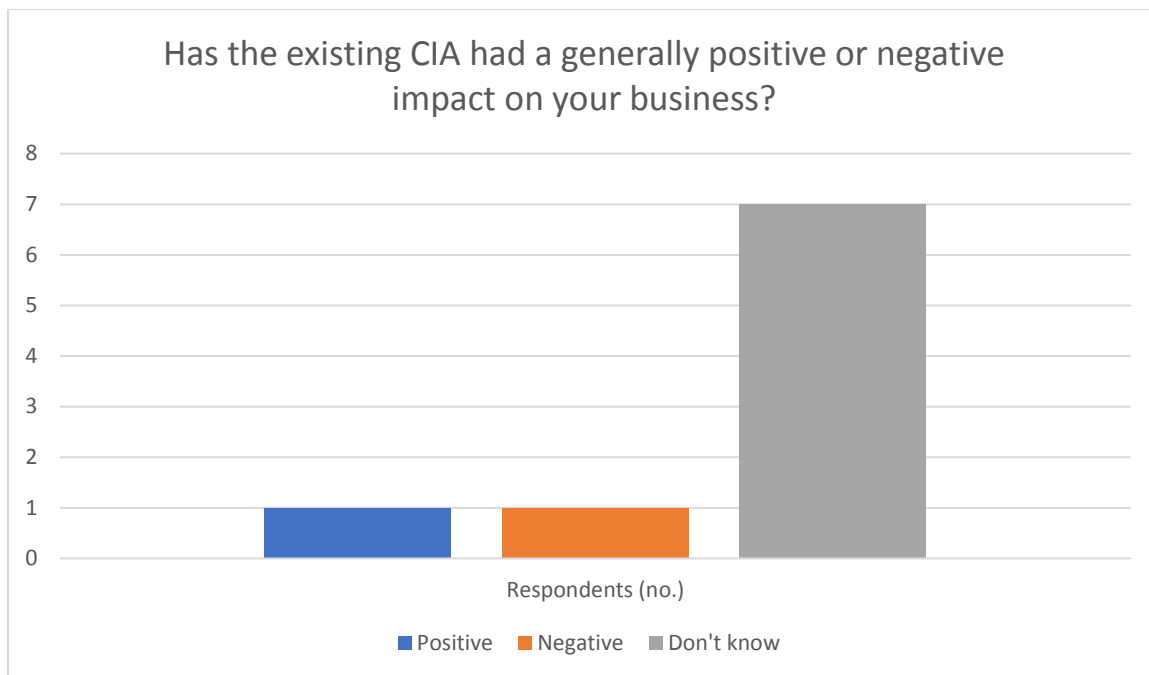
22. 12 respondents disagreed to the renewal of the CIA. 11 (13.3 per cent) were members of the public, and one represented a business within the CIA area (11.1 per cent of all businesses). All 12 respondents provided a free text response to explain their answer. The most frequent response highlighted the impact of COVID-19 on businesses in the town and that the CIA could hinder recovery.

<b>Comments - Disagree</b>	<b>Frequency of inclusion</b>
Post COVID-19 stimulus is needed, or the council should not stand in the way of recovery	3
More outside serving needed	2
CIA can have negative impact on business and removal can stimulate night time economy	2
A town centre should be full of licenced premises	1
Individual businesses can control behaviour inside their premises	1
No negative impact to licensed premises in Bury	1
Evidence provided by Public Health and Police does not suggest CIA is needed	1
Not necessary or a waste of public money	1

## **Section 2: Questions 2 – 5**

### **Business Questions**

23. These series of questions were specifically aimed at businesses and licensees in the Bury St Edmunds area, both within and outside the CIA, to investigate the possible impact the CIA may have had on business. A free text comment option was provided for respondents to offer a reason for their answers.
24. Of the nine responses from all businesses, four (44.4 per cent) identified as being alcohol licensees – two held an On-Off Trade Premises licence; one a bar licence; and one a licence to sell alcohol on premises. Five (55.6 per cent) stated that their business does not hold a licence to sell alcohol.
25. When asked whether the existing CIA has had a generally positive or negative impact on their businesses, seven of the nine respondents stated that they “don’t know”. The other respondents were split - one respondent answering that it had had a generally positive impact, and another that it had a generally negative impact.



(Graph shows that the majority of businesses don't know whether the impact of the CIA on their ability to operate has been positive or negative)

26. Of the respondents that answered "don't know", 4 were from businesses within the CIA and 3 from outside the CIA; and 3 stated they held an alcohol licence, compared to 4 non-licensees.
27. The free text comments provide greater clarity around why respondents answered "Don't know". 1 respondent stated that they had only opened recently, so could not assess its impact; 1 respondent considered it to have had both positive and negative impacts – positive in reducing ASB, but negative if it had resulted in premises remaining vacant for longer; and another respondent indicated that they had no issue managing customers, but that street drinking in the town was disruptive.

Comments – Don't know	Frequency of inclusion
Opened recently so cannot assess	1
Some positives, some negatives	1
No problems managing customers, but street drinking is disruptive	1

28. The respondent that considered the impact of the CIA to have been largely positive represented a non-licensee business from within the CIA area. This respondent provided a free text explanation for their answer, stating that they considered the removal of the CIA to have a negative impact on their business due to a resultant increase in night-time antisocial behaviour



resulting in loss or damage to premises and those of neighbouring businesses and homes.

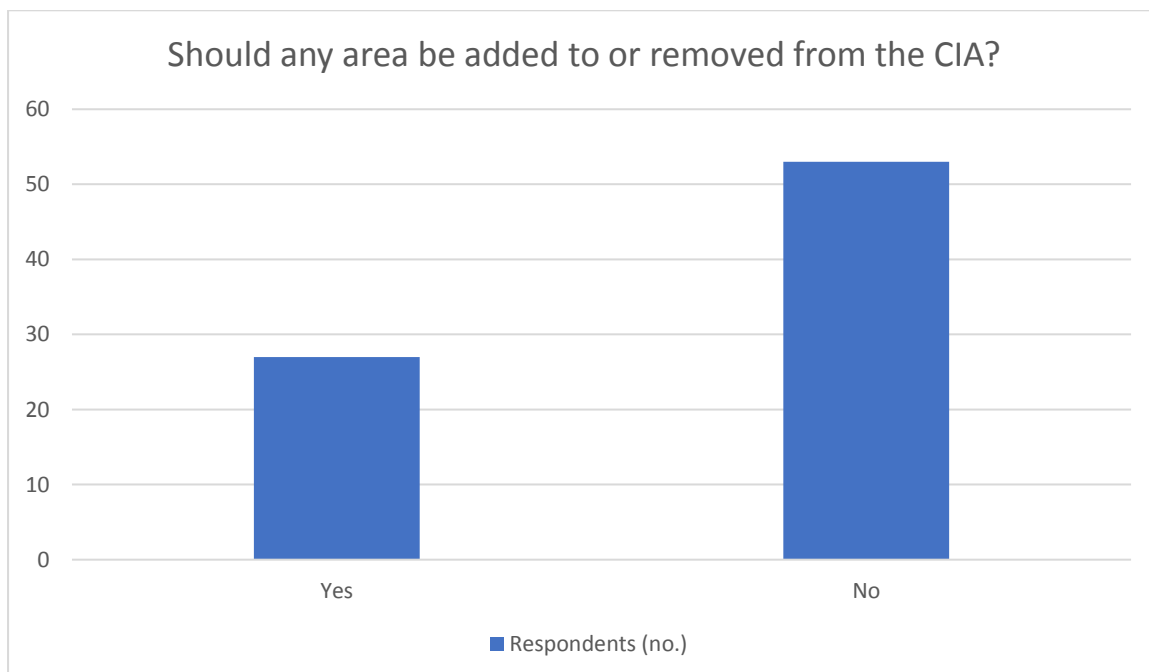
29. The respondent that considered the impact of the CIA to be largely negative was a bar licence holder from within the CIA. This respondent provided a free text explanation, stating that they did not see that the town was a safe place.

<b>Response</b>	<b>Comments</b>	<b>Frequency of inclusion</b>
Positive	The removal of the CIA will have a negative impact on their business due to an increase in night time antisocial behaviour	1
Negative	The town is not a safe place to be	1

### **Section 3 – Questions 8-11**

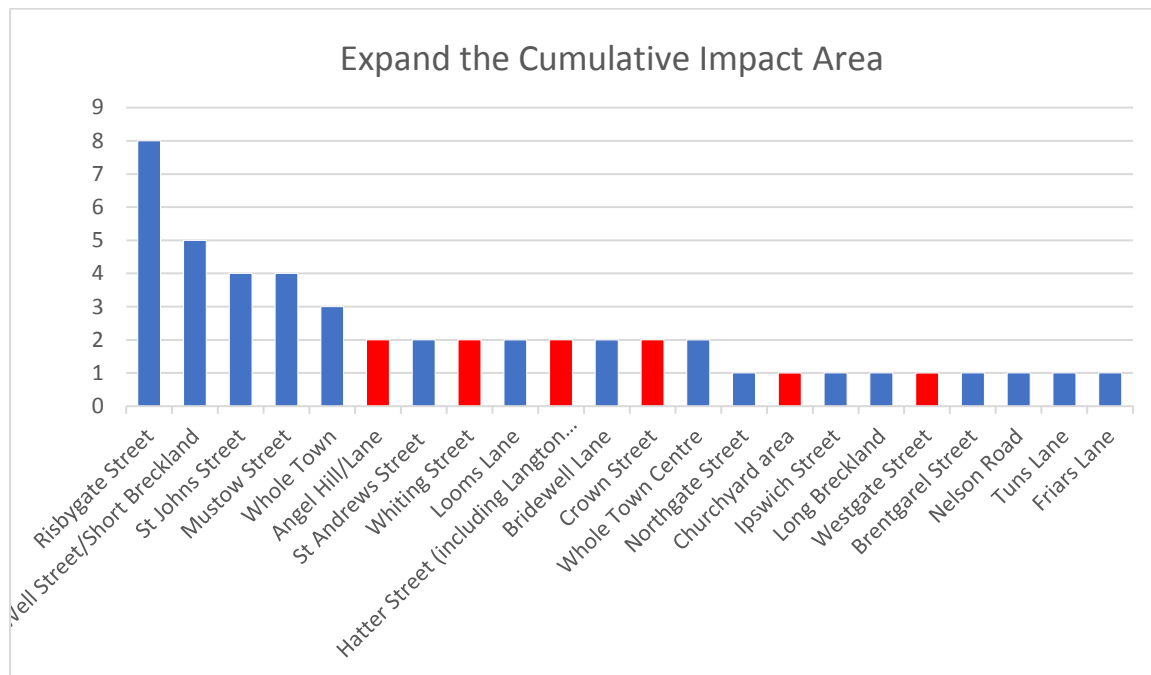
#### **Should any area be added to or removed from the CIA?**

30. Questions 8 to 11 focused on gathering evidence on possible areas to add to or remove from the current CIA. Where appropriate, comments made in other segments of the questionnaire will be incorporated into this data. This qualitative data once collated will be compared to other data held by the council and partners in order to make the case for changing the boundaries of the CIA. 27 of 80 responses (33.8 per cent) were in favour of adding to or removing an area to the CIA; 53 (66.3 per cent) answered no.



(Graph shows that the majority of respondents think the CIA boundaries should not be changed)

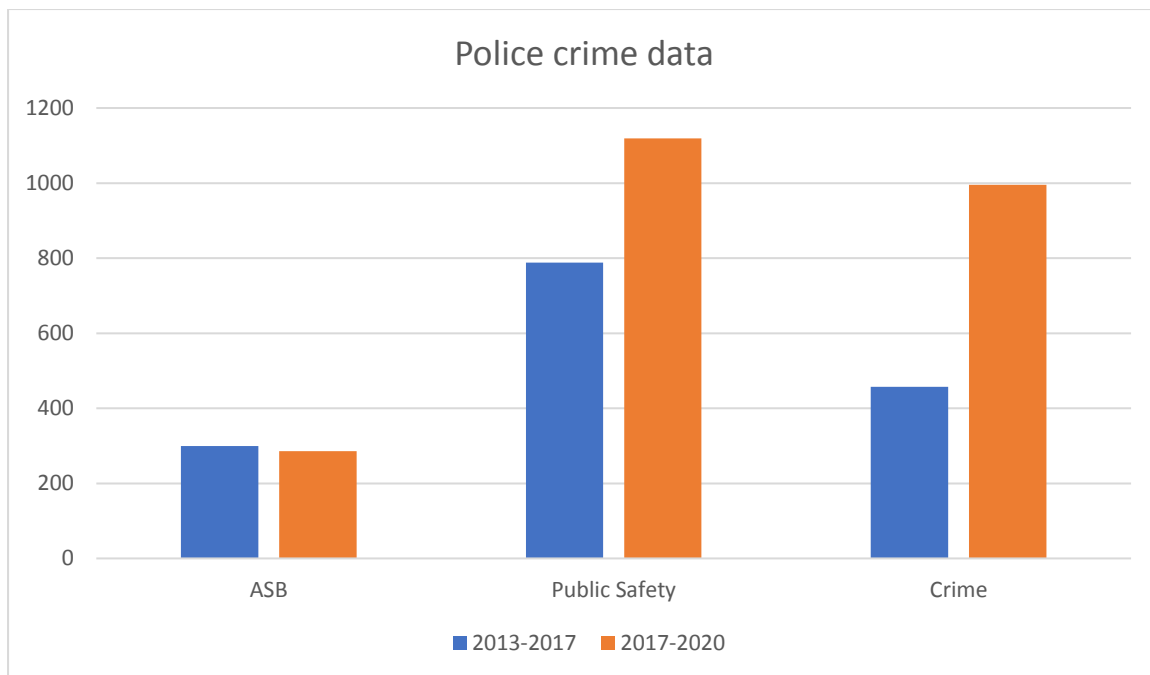
31. Of the 27 respondents that agreed that the CIA should be expanded or retracted, 25 provided free text responses. All free text responses indicate that the CIA should be expanded. Extending the CIA to include both sides of Risbygate Street was the most frequent recommendation (8), followed by the Well Street-Short Breckland area (5), St Johns Street (4), Mustow Street (4) and Whole Town (3).



(Graph shows streets that were mentioned as areas to potentially expand the CIA. Most respondents recommended expanding the CIA to both sides of Risbygate Street. Please note: some respondents recommended areas that are already in the CIA. These are highlighted in red and should be viewed to indicate where more work may be needed to combat ASB. In addition, some streets, most notably Risbygate and St Andrews, are only part covered by the CIA. For the purposes of this analysis, they will be marked as blue.)

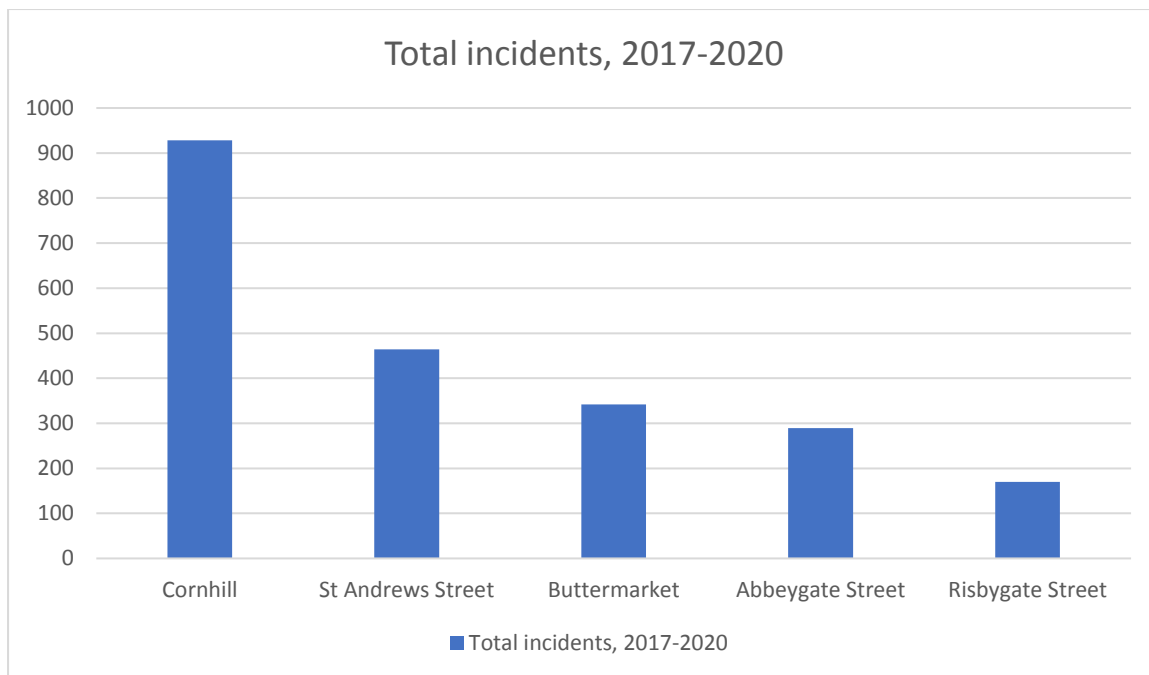
**Comparison with Police crime data**

32. The Police provided data as part of the evidence base for the consultation. The information provided includes a broad sweep of incidents in Bury St Edmunds between 2013 to 2017, and 2017 to 2020. The incidents recorded cover ASB, Public Safety issues and Crime. While the data provided by the Police does not support expanding the CIA, the number of incidents suggests that it is important to maintain the CIA in Bury St Edmunds.



(Graph shows that ASB has decreased slightly, but that public safety issues and crime have increased between the periods 2013-2017 and 2017-2020)

33. The overall trend suggests that the number of incidents of ASB in the town are at a stable level, with a slight decrease in the period 2017-2020 (286 incidents) compared to 2013-2017 (299 incidents). However, public safety and crime have increased. Public safety incidents have increased from 788 incidents between 2013-2017 to 1,119 incidents between 2017-2020. Similarly, crime incidents have increased from 457 between 2013-2017 to 995 between 2017-2020.
34. The Police information for 2017-2020 also provides location data. Five locations in Bury St Edmunds account for over 80 per cent of all incidents. The most incidents are recorded in Cornhill (928). St Andrews Street had the second highest number of incidents (464), followed by the Buttermarket (342), Abbeygate Street (289) and Risbygate Street (170).



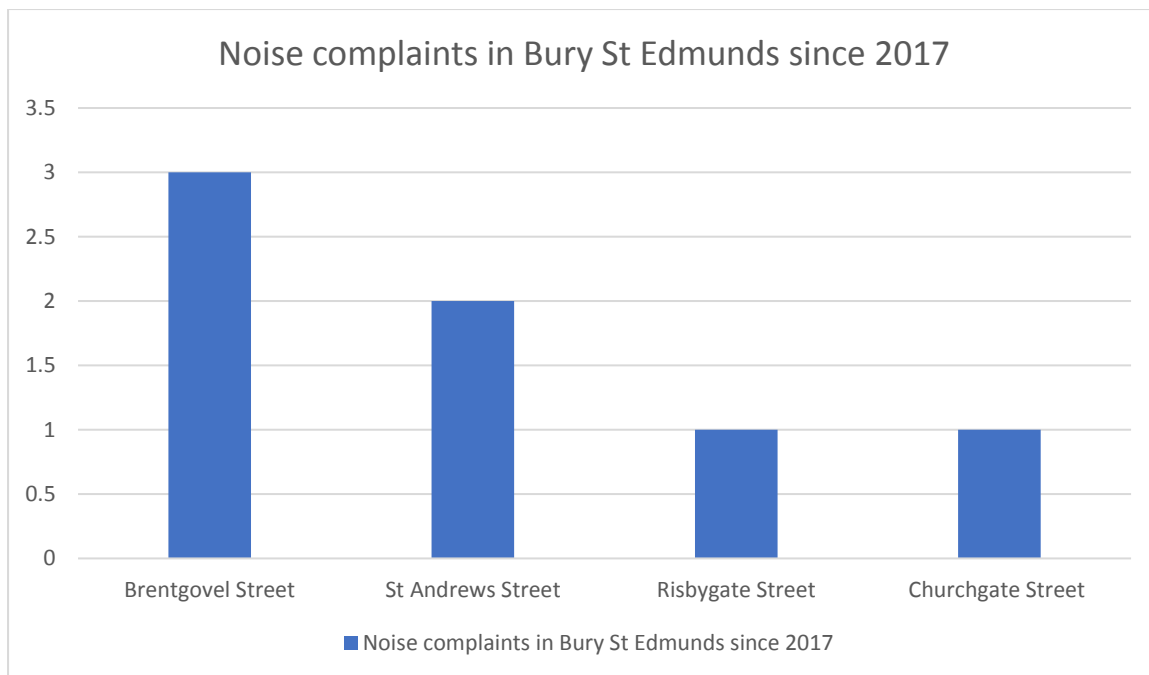
(Graph shows that the most number of incidents between 2017-2020 occurred around Cornhill, with having the St Andrews Street the second highest number of incidents)

35. All these areas are within the current CIA in Bury St Edmunds. However, two locations, St Andrews Street and Risbygate Street, are not entirely covered by the CIA and it is unknown how many recorded incidents occurred outside the CIA boundary.

### **Comparison with noise complaints information**

36. When the consultations qualitative data is compared with quantitative information gathered by the council on noise complaints in Bury St Edmunds since 2017, there is little evidence to suggest that the CIA requires expansion.

37. Since 2017, there have been seven official noise complaints originating from license-holders in Bury St Edmunds. Brentgovel Street received the most complaints (3), followed by two complaints for disturbances on St Andrews Street, one on Risbygate Street and one on Churchgate Street. However, all seven complaints originate around venues already within the CIA.



(Graph shows that the most number of noise complaints occurred on Brentgovel Street)

### Additional comments on the CIA - Question 11

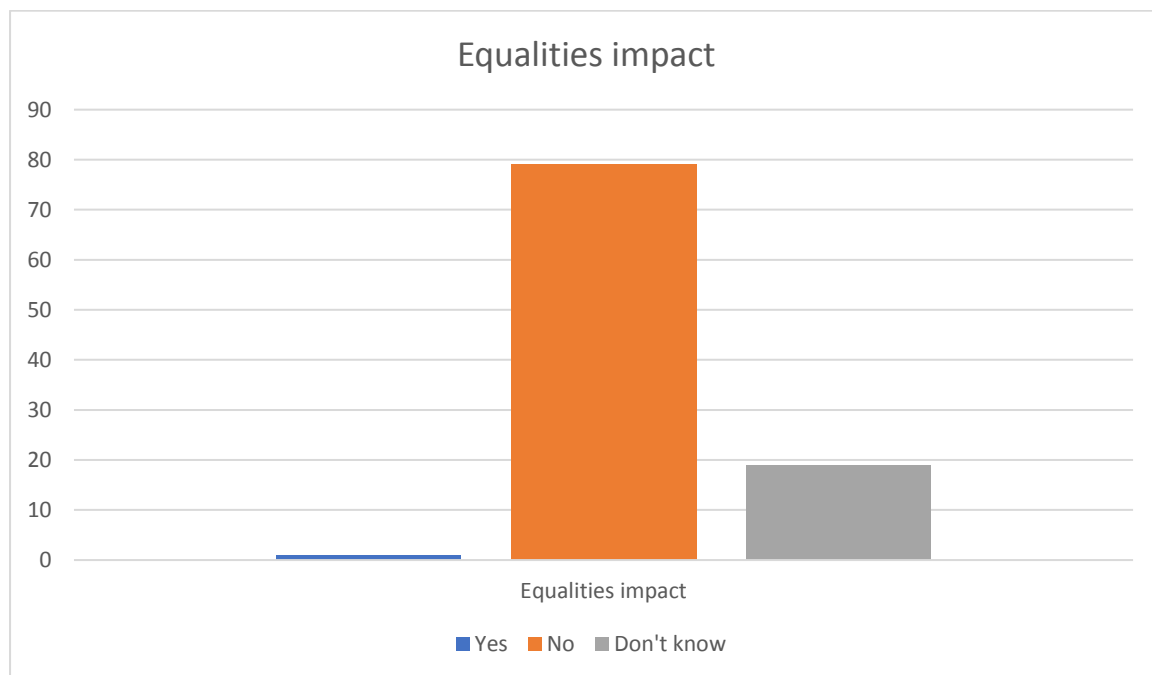
38. Question 11 asked respondents to provide any additional comments on the CIA. 35 respondents supplied a free text answer to this question. The most frequent additional comment related to the importance of renewing the CIA (18), with 4 respondents specifically stating that the CIA has made them feel safer in the town. Other comments highlighted a feeling that ASB was increasing in Bury St Edmunds (5), as well as a feeling that the Police needed to be more proactive and work in conjunction with PSPOs (4).

Additional comments	Frequency of inclusion
Important to renew the CIA	18
There is an increase in ASB, street drinking and other related	5
The Police should be more proactive in reducing ASB, street drinking and other related	4
Should not be used to limit businesses	2
No additional comment	2
There are enough licensed premises in town centre	1
Each new application should be considered in wider context	1

Pubs open late should be required to employ bouncers	1
The CIA should be expanded	1
The council should focus on supporting vulnerable people responsible for majority of ASB, street drinking and other related	1
Bars and pubs should close earlier	1
The CIA is not needed	1

### Equalities impact – Question 12

39. Respondents were asked an additional question around equalities impact. 79 out of 99 respondents (79.8 per cent) answered that they did not think that any aspect of the CIA had a disproportionate impact on any individual or group. 1 respondent answered that they did think it had a disproportionate impact, and 19 respondents (19.2 per cent) stated that they “Don’t know”. 8 free text comments were added by respondents.



(Graph shows that the majority of respondents think that there is no potential equalities impact from the CIA)

40. Responses to this question can be divided between issues that can be considered under the Equalities Act and other issues. The respondent that answered yes provided a free text explanation, stating that the CIA was very weighted in favour of older, wealthier residents. Other comments stated that alcoholism and ASB are issues affecting all members of society, regardless of background or status (3). Two comments stated that the CIA is not discriminatory, and one cited the need for more measures to educate people on responsible drinking.

<b>Comments – Equalities Legislation</b>	<b>Frequency of inclusion</b>
Alcoholism and ASB an issue for all	3
No discrimination	2
Age discrimination (favours older residents)	1
Income discrimination (favours wealthier residents)	1

<b>Comments – Other issues raised</b>	<b>Frequency of inclusion</b>
More measures needed to educate people on responsible drinking	1

## **Conclusion**

During the seven-week consultation period, the responses received to the consultation were significantly in favour of retaining the Cumulative Impact Area in Bury St Edmunds. In addition, there was no split in opinion between different groups, with a majority from each respondent grouping being in favour of retaining the CIA. Responses that were not in favour of retaining the CIA, however, did focus on pressing issues, such as the impact of COVID-19 on businesses in the area – although responses from businesses themselves did not indicate an overall negative impact of the CIA on their capacity to operate.

Regarding questions on expanding the CIA: most comments in favour of increasing CIA area focused on ensuring it covered both sides of Risbygate Street. However, the evidence suggests that there is neither a majority in favour of expansion, nor is there enough evidence to justify the CIA covering additional areas of the town centre.