

Area 1 relates to the city centre. West Yorkshire Police has shared information and statistics that show that the nature of the city centre is such that the cumulative impact of licensed premises leads to problems that aren't experienced in other parts of the city and this can be attributed to the density of licensed premises in specific areas. The number and close proximity of venues on a street can result in difficulties in identifying individual premises as causing problems and so action planning and reviewing individual licences is not possible.

The closure or opening of businesses can have a dramatic effect on reported crime and incidents in an area. While problems at individual premises are dealt with using action planning and the review process, there are areas in Leeds city centre which become saturated as new businesses open or existing businesses change their style of operation.

In addition the council recognises that a previous problem area can be improved by the introduction of new styles of business types, such as food led premises like restaurants and seeks to encourage this.

The dynamic nature of the city centre has created difficulties in setting a policy that will be relevant for five years until the next formal review of the Licensing Policy. Therefore the council has adopted an approach of designating areas within the city centre CIP as 'red' or 'amber' based upon an analysis of crime and disorder in the night time economy and will review these areas on an annual basis.

Areas that are considered highly saturated and that are experiencing particularly high levels of crime, disorder and/or nuisance will be designated as red areas. The policy states that the council will seek to refuse all applications in these **red areas** on the basis that the impact on the licensing objectives is at such a level that the area cannot support any more premises opening or extending their operation and that the council will only grant applications in the red zone in exceptional cases. Exceptional does not mean that an application is innovative or novel, but that it allows Members to make an exception to their policy. Those exceptional cases would be where the premises can demonstrate that they will not impact on the issues already being experienced in the area, i.e. by containing their operation within the hours of the daytime and early evening economy.

Any variation that will effectively increase the occupancy of premises will be viewed in a similar light to a new application as it may increase the available capacity in the same way a new premises in that area would, which in the red area would be unacceptable. Similarly new businesses seeking to introduce a new concept, and so attract different people into the area, may be acceptable in the amber area but in the red area the problems are exacerbated by the sheer number of people on the street during the peak hours and introducing a new or extended business, even with a different concept, would add to the impact rather than reduce it.

Management controls such as door staff will not be adequately effective in preventing an increase in the number of people within the red zone.

The **amber area** is an area which is of concern, based upon an analysis of issues within the night time economy that are relevant to the licensing objectives, and the council will expect applicants to offer additional measures tailored to the problems in that area. Applicants are strongly advised to consult with West Yorkshire Police and the licensing authority during their application process. By working together, the responsible authorities and businesses can establish working practices that reduce crime and disorder and so benefit the long term aims of the city to be a vibrant, thriving economy.

All other areas within the city centre CIP will be designated **green areas** where good quality applications will be generally be more acceptable even though the area is a CIP area.

It is the council's policy, on receipt of relevant representations, to

- refuse new and variation applications in the red area
- to seek additional measures for new and variation applications in the amber area
- to seek good quality applications for application in the green area

This applies to alcohol led premises such as bars, pubs and nightclubs, and for premises seeking late night refreshment such as takeaways and late opening restaurants.

Extra scrutiny is given to applications which appear to adopt a number of different styles during their trading. For example businesses that purport to be food led but seek late opening hours may be judged to be predominantly alcohol led due to their late night activities. It is for the applicant to demonstrate how their business will not impact on the licensing objectives.

## Changes in the last year

There are two distinct areas in the city where extra police resources are deployed on a regular basis. These areas are the Call Lane area and the Albion Street/ Woodhouse Lane area. Premises in those areas have deployed street marshals at their own expense in the past as it has been recognised that incidents on the street require extra attention and that early intervention can prevent an escalation in the severity of incidents on the street. However in recent years this scheme has fallen away and the violent crime rate has increased.

As police resources are reducing each year, priorities have been realigned. There has been a small reduction in the number of arrests for drunk and disorderly again this year but an increase in assault. The increase in assaults could be due to early intervention methods being cut back, such as the street marshalling scheme and intervention at an early level (i.e. arresting people for being drunk and disorderly), and so the low level offences are escalating to the more serious assault charge.

The issues with disorder in the street on Call Lane has led to a road closure between 11pm and 5am on the Friday, Saturday and Sunday night which took effect in October 2015. The sheer numbers of people, often intoxicated, in the street during these hours highlights the need for the overall capacity of the red area to decrease, not increase. Further work is ongoing with the operators in Hirsts Yard to reduce criminality in this area.

The Council continues to receive applications within the areas designated as red. There has been a trend for existing operators to apply for minor and full variations to bring into use areas which were unlicensed previously. In all cases the premises licence holder has undertaken to keep their capacity the same. However this trend for increasing the licensed area is concerning as the ability to control capacity is difficult. Any application seeking an increase in floor space, even without an increase in stated capacity, can expect close scrutiny.

## Police Crime Reporting

West Yorkshire Police has produced a crime report "*Leeds City Centre: Night Time Economy Related Crime*" dated September 2017 which has been referred to when reviewing the red and amber zones for 2017. This report is referred to as the Police report in this document. It uses reported crime figures from 01/09/2015 – 31/08/2017. The police report only compares statistics from the last two years, as the statistics are not comparable going further back than that due to the changes in the way in which crime is recorded. The following data tables and key findings (signified by bullet points) have been extracted from the police report.

### City Centre

Occurrence Type	01/09/2015 - 31/08/2016	01/09/2016 - 31/08/2017	Change +/-	% Change
Affray	38	52	14	37%
Assault	1300	1524	224	17%
Drunk And Disorderly	255	267	12	5%
Public Order	291	389	98	34%
Robbery	95	146	51	54%
Theft From Person	1168	1453	285	24%
Theft Non Specific	1518	1554	36	2%
<b>Total</b>	<b>4665</b>	<b>5385</b>	<b>720</b>	<b>15%</b>

Figure 1 shows the breakdown of occurrence type 01/09/2015 – 31/08/2017

## Licensed Premises Flag

Occurrence Type	01/09/2015 - 31/08/2016	01/09/2016 - 31/08/2017	Change +/-	% Change
Affray	3	4	1	33%
Assault	251	263	12	5%
Drunk And Disorderly	15	15	0	0
Public Order	11	21	10	91%
Robbery	2	1	-1	-50%
Theft From Person	488	453	-35	-7%
Theft Non Specific	537	586	49	9%
<b>Total</b>	<b>1307</b>	<b>2650</b>	<b>36</b>	<b>103%</b>

Figure 2 shows the offences flagged as license premises involved 01/09/2015 – 31/08/2017

## Alcohol involved flag

Occurrence Type	01/09/2015 - 31/08/2016	01/09/2016 - 31/08/2017	Change +/-	% Change
Affray	14	18	4	29%
Assault	331	347	16	5%
Drunk And Disorderly	203	180	-23	-11%
Public Order	39	59	20	51%
Robbery	11	15	4	36%
Theft From Person	43	35	-8	-19%
Theft Non Specific	27	20	-7	26%
<b>Total</b>	<b>668</b>	<b>674</b>	<b>6</b>	<b>1%</b>

Figure 3 shows the offences flagged as alcohol involved 01/09/2015 – 31/08/2017

## Offences by day or night time economy

### DTE

Occurrence Type	01/09/2015 - 31/08/2016	01/09/2016 - 31/08/2017	Change	% Change
Affray	6	10	4	67%
Assault	288	320	32	11%
Drunk And Disorderly	35	30	-5	-14%
Public Order	149	214	65	44%
Robbery	29	38	9	31%
Theft From Person	352	599	247	70%
Theft Non Specific	674	705	31	5%
<b>Total</b>	<b>1533</b>	<b>1916</b>	<b>383</b>	<b>25%</b>

Figure 4 shows the offences during the DTE (06:00 – 17:59) between 01/09/2015 – 31/08/2017

## NTE

Occurrence Type	01/09/2015 - 31/08/2016	01/09/2016 - 31/08/2017	Change +/-	% Change
Affray	32	42	10	31%
Assault	1012	1204	192	19%
Drunk And Disorderly	220	237	17	8%
Public Order	142	175	33	23%
Robbery	66	108	42	64%
Theft From Person	816	854	38	5%
Theft Non Specific	844	849	5	5%
<b>Total</b>	<b>3132</b>	<b>3469</b>	<b>337</b>	<b>11%</b>

Figure 5 shows the offences during the NTE (18:00 – 05:59) between 01/09/2015 – 31/08/2017

The tables clearly show that there has been an increase in crime across the city centre. The police report conclusions state:

- An analysis of the examined offences shows overall offending in the City Centre has increased by 15% compared with the previous examined period.
- During 01/09/2016 and 31/08/2017, Assaults and Theft from Person offences have seen the highest increases in terms of volume compared with the previous year. Robbery offences have experienced the greatest percentage change. All examined offences experienced an increase in volume.
- As seen in previous reporting, Assaults and Theft (Non Specific) have the highest number of offences with a licensed premises flag and experienced the greatest increases during the period.
- Assaults continue to be the highest alcohol related crime, followed by Drunk and Disorderly offences. While Drunk and Disorderly offences saw a decrease, Public Order offences increased.
- Theft and Assault offences are the top offence categories for both the day time economy and night time economy.
- In both the examined periods there are more reports of 'off street' offences than 'on street'. The number of assaults occurring 'off street' are fairly similar in both years. There are more assaults reported to occur 'on street'.

## Street Level Data

The tables below relate to Leeds City Centre night time economy offending only (18:00 to 05:59) and show the top ten streets and the top ten streets of increasing concern for the night time economy offending. The table shows the percentage of the street compared with the city centre total as shown in Figure 5.

Top 10 Street Names	2015 - 2016	% of City 2015-2016	2016 - 2017	% of City 2016 -2017	Change +/-
BRIGGATE	572	18.3%	631	18%	59
CALL LANE	531	17%	565	16.8%	34
ALBION STREET	263	8.4%	294	8.7%	31
WOODHOUSE LANE	213	6.8%	248	7.3%	35
BOAR LANE	140	4.5%	178	5.2%	38
COOKRIDGE STREET	99	3.2%	116	3.4%	17
THE HEADROW	88	2.8%	109	3.2%	21
MERRION STREET	113	3.6%	98	2.9%	-15
GREAT GEORGE ST	76	2.7%	95	2.8%	19
HEATONS COURT	72	2.3%	79	2.3%	7

Top 10 Street Names Of Increasing Concern	2015 - 2016	% of City 2015-2016	2016 - 2017	% of City 2016-2017	Change +/-
BRIGGATE	572	18.3%	631	18%	59
CALL LANE	531	17%	565	16.8%	34
ALBION STREET	263	8.4%	294	8.7%	31
WOODHOUSE LANE	213	6.8%	248	7.3%	35
BOAR LANE	140	4.1%	178	5.2%	38
THE HEADROW	88	2.6%	109	3.2%	21
GREAT GEORGE ST	76	2.2%	95	2.8%	19
PARK ROW	21	0.6%	40	1.1%	19
KIRKGATE	27	0.8%	34	1%	7
BRIDGE END	16	0.5%	30	0.9%	14

These clearly show that there has been no improvement over the last year with Briggate and Call Lane areas are responsible for 35% of crime reported in the city in the last year. 16% of crime was reported in the other red area of Albion Street/Woodhouse Lane.

The police report conclusions were:

- Briggate, Call Lane, Albion Street and Woodhouse Lane are the top streets for offending in the night time economy for both examined periods. These streets are located within the two city centre CIP red areas, supporting the view that both red areas should be maintained.

### Red Area Comparisons

The stated crime figures and time analysis is taken from offences occurring within the red outlining square, between 18:00 – 05:59. Assaults, theft from person, theft non-specific, robbery and sexual offences have been included in this analysis.

### Call Lane Red Area



<p><b>NTE: Year 2015– 2016 (Sept – Aug)</b></p> <p>Crime:</p> <ul style="list-style-type: none"> <li>▪ Assault: 420 (+73)</li> <li>▪ Robbery: 27 (+14)</li> <li>▪ Sexual Offences: 26 (+6)</li> <li>▪ Theft From Person: 487 (+77)</li> <li>▪ Theft Non Specific: 382 (+27)</li> </ul> <p>Time Analysis:</p> <p>Peak Time: 00:00 – 05:00</p> <p>Risk days: Thursday, Friday and Saturday</p>	<p><b>NTE: Year 2016 – 2017 (Sept – Aug)</b></p> <p>Crime:</p> <ul style="list-style-type: none"> <li>▪ Assault: 495 (+75)</li> <li>▪ Robbery: 37 (+10)</li> <li>▪ Sexual Offences: 31 (+5)</li> <li>▪ Theft From Person: 472 (-15)</li> <li>▪ Theft Non Specific: 422 (+40)</li> </ul> <p>Time Analysis:</p> <p>Peak Time: 23:00 – 04:00</p> <p>Risk days: Saturday/Sunday highest; also Thursday and Friday</p>
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Figure 8: Call Lane red area for the period 01/09/2015 - 31/08/2016 and 01/09/2016 - 31/08/2017

The police report conclusions were:

- The Call Lane red area remains the predominant hot-spot area. Geo-spatial analysis shows the main risk area within the city centre is the area of Call Lane and Briggate, as shown as Section 7.1. The highest concentration of offences remains in this area and has slightly extended compared with the previous 12 months, but still falling within the existing designated area. The peak time for offending in the Call Lane area is now 23:00 - 04:00.
- Within the Call Lane area, all the examined offences namely Assaults, Robberies, Sexual Offences and Thefts have increased during 2016 and 2017 with Assaults, Robberies and Theft offences seeing the largest increase.

Not only have all crimes increased in this area again this year by another 15%, the peak times have shifted from midnight to 5am to 11pm to 4am. The risk days have changed from Thursday, Friday and Saturday to Thursday to Sunday with Saturday and Sunday the highest. Most worrying are the increases in assault and theft from person.

This shows not only how important it is that the number of people using this area during the night time does not increase but that it would be desirable for the number of people using this area during peak hours to reduce. Therefore any change to the current licences, either new premises or any increase in the operation of the existing premises should not have the effect of increasing visitors to the area.

Furthermore the Council will be investigating ways in which assault and theft can be reduced, in liaison with the operators and agencies. LeedsBID has introduced teams of Purple Ambassadors who operate in a similar way to the street marshalling scheme, with officers patrolling the red areas and dealing with low level nuisance to prevent it from becoming the more serious crime of assault.

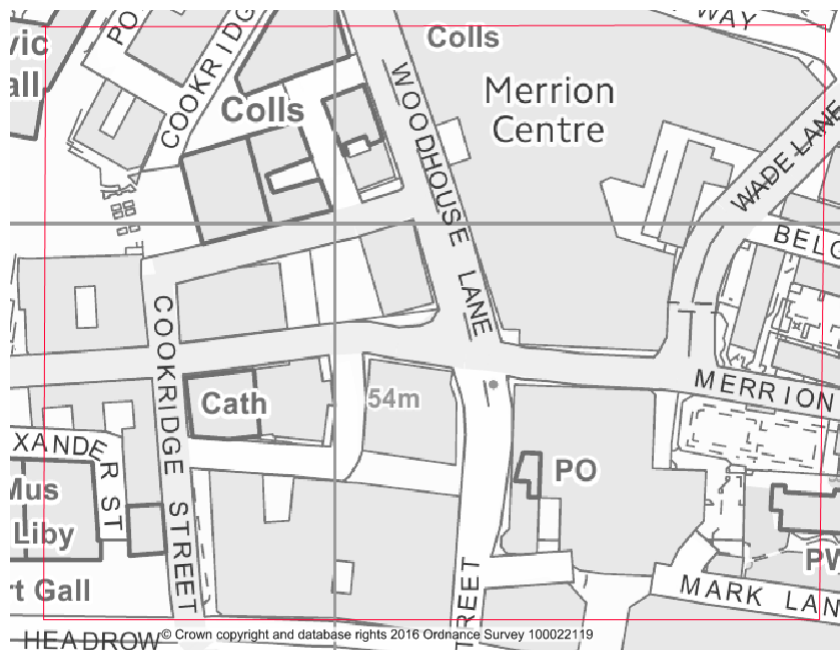
In the last year the Licensing Authority has received applications from:

- a premises on Albion Street seeking to increase their hours, which was refused;
- a premises on Hirsts Yard seeking to make structural changes and update conditions which was granted
- a premises on Call Lane which sought to add off sales to their current licence to allow people to use an outside area, which was granted

- a premises on Briggate which sought to increase their floor space but offered a number of stricter conditions which controlled capacity which was granted
- a premises on Briggate seeking a new application for late night refreshment which was refused
- a premises on Call Lane seeking alcohol in conjunction with food and closing prior to peak hours which was granted
- a premises on Call Lane which sought to extend their hours by one hour til midnight. This matter was outstanding as this assessment was finalised.

Any operator seeking a variation to their current licence must be mindful of the problems being experienced in the area and must ensure that the additional measures they offer will result in no impact on the licensing objectives. A responsible operator will always be seeking ways in which they can contribute to the efforts made to reduce the crime statistics, and would not be satisfied with merely maintaining the status quo.

### Albion Street / Woodhouse Lane Red Area



<p><b>NTE: Year 2015 – 2016 (Sept – Aug)</b></p> <p>Crime:</p> <ul style="list-style-type: none"> <li>▪ Assault: 228 (+64)</li> <li>▪ Robbery: 3 (+2)</li> <li>▪ Sexual Offences: 7 (-2)</li> <li>▪ Theft From Person: 126 (-2)</li> <li>▪ Theft Non Specific: 150 (+19)</li> </ul> <p>Time Analysis:</p> <ul style="list-style-type: none"> <li>▪ Peak: 00:00 - 0400</li> <li>▪ Secondary : 23:00 – 00:00</li> </ul> <p>Risk days: Monday, Friday, Saturday</p>	<p><b>NTE: Year 2016 – 2017 (Sept – Aug)</b></p> <p>Crime:</p> <ul style="list-style-type: none"> <li>▪ Assault: 251 (+23)</li> <li>▪ Robbery: 8 (+5)</li> <li>▪ Sexual Offences: 14 (+7)</li> <li>▪ Theft From Person: 151 (+25)</li> <li>▪ Theft Non Specific: 147 (-3)</li> </ul> <p>Time Analysis:</p> <ul style="list-style-type: none"> <li>▪ Peak: 23:00 - 0400</li> <li>▪ Main Peak : 01:00 – 03:00</li> </ul> <p>Risk days: Saturday</p> <p>Secondary days: Monday, Tuesday, Thursday</p>
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Figure 9 Map showing the Albion Street red area for the period 01/09/2015 - 31/08/2016 and 01/09/2016 - 31/08/2017



The police report conclusions were:

- Within the Albion Street / Woodhouse Lane Red area, the hot-spot areas have remained the same in both examined periods, specifically the bottom of Woodhouse Lane and top of Albion Street, as shown in Section 7.2. During the period 2016 to 2017, the peak time is shown as between 01:00 – 03:00.

In the last year the Licensing Authority has received one application from a premises on Albion Street seeking to increase their hours, which was refused.

However the overall 9% increase in crime and the lengthening of the peak hours is worrying. As with the Call Lane/Lower Briggate area this shows not only how important it is that the number of people using this area during the night time does not increase but that it would be desirable for the number of people to reduce. Therefore any change to the current licences, either new premises or any increase in the operation of the existing premises should not have the effect of increasing visitors to the area.

As with the Call Lane area the Council will be investigating ways in which assault and theft can be reduced, in liaison with the operators and agencies. LeedsBID has introduced teams of Purple Ambassadors who operate in a similar way to the street marshalling scheme, with officers patrolling the red areas and dealing with low level nuisance to prevent it from becoming the more serious crime of assault.

### **Cross Belgrave Street / Merrion Street / New Briggate:**

The following area is not a designated 'red area' in the existing CIP; although, it has been noted as an emerging area of popularity during the 'Night Time Economy'.



<p><b>NTE: Year 2015 – 2016 (Sept – Aug)</b></p> <p>Crime:</p> <ul style="list-style-type: none"> <li>▪ Assault: 108 (+28)</li> <li>▪ Robbery: 8 (+2)</li> <li>▪ Sexual Offences: 8 (+2)</li> <li>▪ Theft From Person: 96 (+11)</li> <li>▪ Theft Non Specific: 112 (-6)</li> </ul> <p>Time Analysis:</p> <ul style="list-style-type: none"> <li>▪ Peak: 01:00 – 04:00</li> <li>Secondary peak: 23:00 – 00:00 and 04:00 – 05:00</li> </ul> <p>Risk days: Thursday, Friday and Saturday</p>	<p><b>NTE: Year 2016 – 2017 (Sept – Aug)</b></p> <p>Crime:</p> <ul style="list-style-type: none"> <li>▪ Assault: 57 (-51)</li> <li>▪ Robbery: 8 (no change)</li> <li>▪ Sexual Offences: 7 (-1)</li> <li>▪ Theft From Person: 50 (-46)</li> <li>▪ Theft Non Specific: 48 (-64)</li> </ul> <p>Time Analysis:</p> <ul style="list-style-type: none"> <li>▪ Peak: 00:00 – 04:00</li> <li>Secondary peak: 23:00 – 00:00 and 04:00 – 05:00</li> </ul> <p>Risk days: Friday and Saturday</p>
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Figure 10: Map showing New Briggate area for the period 01/09/2015 - 31/08/2016 and 01/09/2016 - 31/08/2017

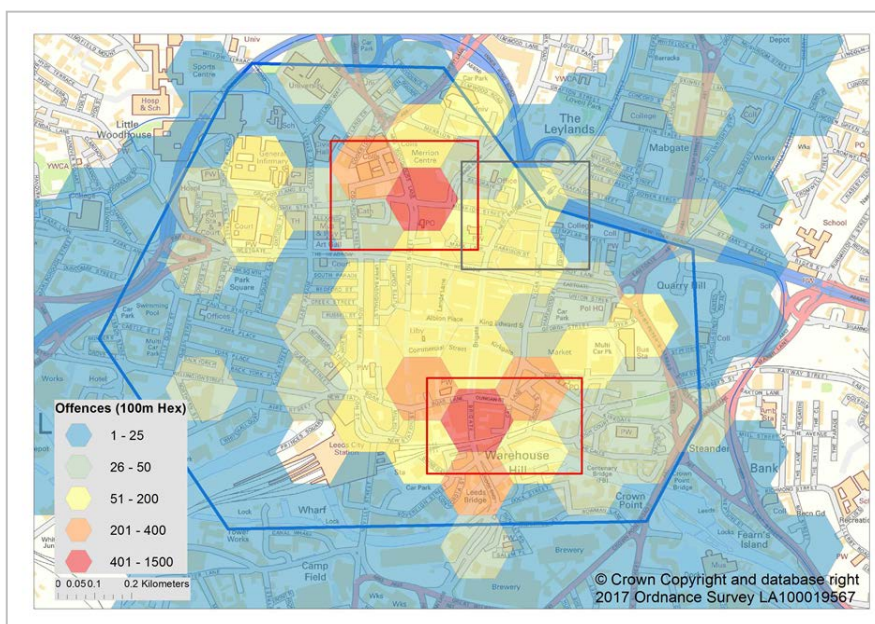
The police report conclusions were:

- The Cross Belgrave Street/Merrion Street/New Briggate areas were noted as an emerging area of concern for the period 2015 – 2016 however several associated offence types have seen reductions over the last 12 month period.

As reported in previous years, this area in Leeds has been developed in the north of the city and is proving very popular. The lengthening of the hot spot period is common with the two red areas however there has been a dramatic reduction in crime across the board.

This area remains in the amber area this year, as this provides the most flexibility to negotiate with applicants regarding safeguards that can be put in place. .

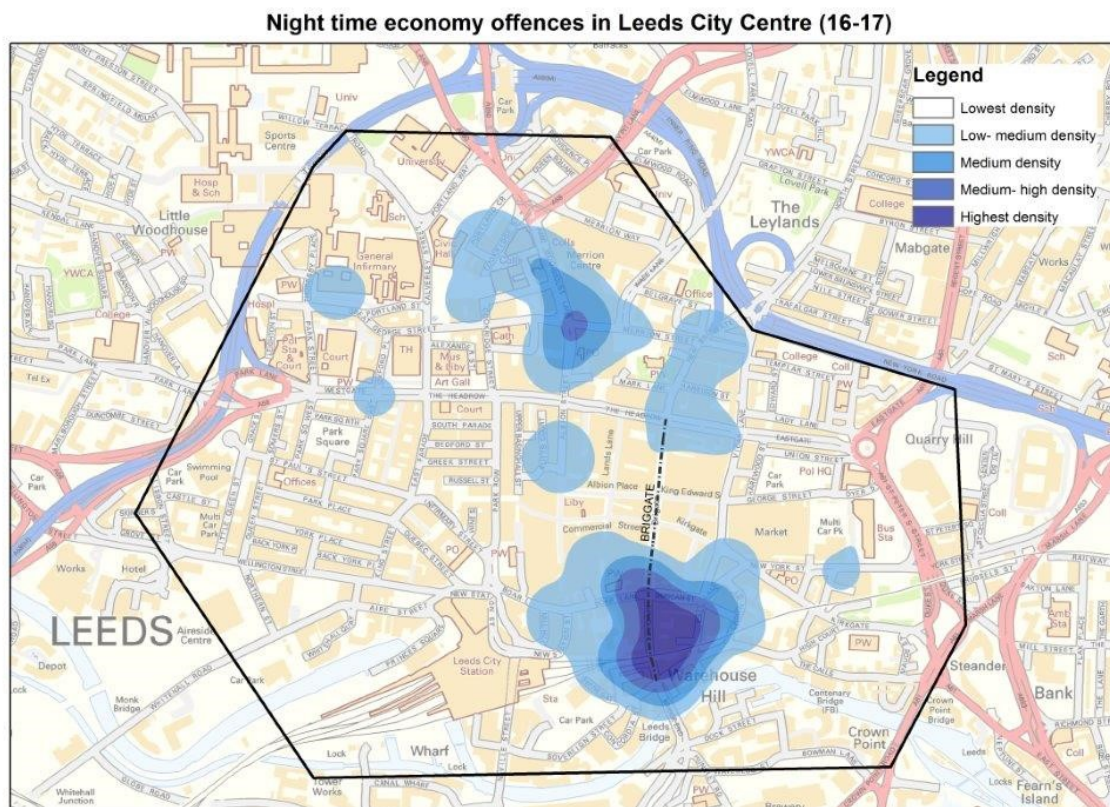
### Night Time Related Offences



The Police Report provides two new maps which show the overall spread of night time offences across the area. The 100m Hex grid shows that the main “hotspot” areas detailed previously (shown as red rectangles on the map) cover the main areas of concern, and that the “emerging” area identified previously (grey rectangle) is no longer covering a major offence hotspot. There

are also no “new” areas of concern (that would be orange or red) outside the current localities.

The map below shows the density of night-time offences across the defined area and the concentration of where offences have occurred, highlighted by darker areas. Briggate (highlighted by a dotted line) has the highest density.



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### City Centre A&E Assault data

A&E data was provided for the period 01/09/2016 – 31/08/2017. A notable proportion did not have a location address or did not specify an exact address, for example “on street” or “on bus”. Detailed location data is no longer provided therefore the proportion directly associated with the City Centre cannot be assessed.

### Road Traffic Incidents

The below table shows the breakdown of Road Traffic Incidents 01/09/2015 - 31/08/2017. The figures have been derived from the red line area “Leeds City Centre” as shown in Section 3.

Incident Type	DTE		DTE Total	NTE		NTE Total	Total
	2015-2016	2016-2017		2015-2016	2016-2017		
Highway Disruption	132	142	274	86	68	154	428
OPL	11	10	21	34	47	81	102
Road Related Offence	62	93	155	68	67	135	290
RTC - Damage Only	316	332	648	165	181	346	994
RTC - Serious Injury	8	14	22	6	6	12	34
RTC - Slight Injury	96	107	203	54	44	98	301
<b>Total</b>	<b>625</b>	<b>698</b>	<b>1323</b>	<b>413</b>	<b>413</b>	<b>826</b>	<b>2149</b>

Figure 12 shows the breakdown of Road Traffic Incidents 01/09/2015 - 31/08/2017.

### Day Time Economy – Top Streets

The below tables show the top ten streets and the top ten streets of increasing concern for road traffic incidents during the daytime economy.

	2015 - 2016	2016 - 2017	Change		2015 - 2016	2016 - 2017	Change
<b>Top Ten Street Names</b>				<b>Top 10 Street Names Of Increasing Concern</b>			
THE HEADROW	26	43	17	THE HEADROW	26	43	17
A58	26	40	14	A58	26	40	14
WELLINGTON ST	26	37	11	WELLINGTON ST	26	37	11
A58(M)	21	31	10	A58(M)	21	31	10
INNER RING ROAD	25	30	5	GREAT GEORGE ST	17	29	12
GREAT GEORGE ST	17	29	12	ALBION ST	15	22	7
WOODHOUSE LANE	22	24	2	CLAY PIT LANE	14	20	6
CROWN POINT RD	17	23	6	A61	11	17	6
ALBION STREET	15	22	7	GEORGE ST	6	11	5
CLAY PIT LANE	14	20	6	BOAR LANE	8	12	4

Figure 13 shows the top streets 01/09/2015 – 31/08/2017 or road traffic incidents during the day time economy.

### Night Time Economy – Top Streets

The below tables show the top ten streets and the top ten streets of increasing concern for road traffic incidents during the night time economy hours.

	2015 - 2016	2016 - 2017	Change		2015 - 2016	2016 - 2017	Change
<b>Top 10 Street Names</b>				<b>Top 10 Street Names of Increasing Concern</b>			
THE HEADROW	19	22	3	SWINEGATE	4	14	10
WOODHOUSE LANE	21	17	4	BRIGGATE	4	12	8
ALBION STREET	16	18	2	CROWN POINT RD	4	12	8
A58	16	16	0	CALL LANE	7	12	5
BOAR LANE	18	14	-4	GREAT GEORGE ST	12	16	4
WELLINGTON ST	13	15	2	INNER RING ROAD	12	16	4
GREAT GEORGE ST	12	16	4	CALVERLEY ST	6	10	4
INNER RING ROAD	12	16	4	VICAR LANE	3	6	3
CLAY PIT LANE	13	14	1	MERRION STREET	7	10	3
A58(M)	11	12	1	PARK SQUARE	0	3	3

Figure 14 shows the top streets 01/09/2015 – 31/08/2017 for road traffic incidents during the night time economy.

The police report conclusions were:

- During the NTE the main hot-spots for Road Related Incidents were around The Headrow, Woodhouse Lane and Albion Street with a smaller concentration around Boar Lane and Wellington Street

### **Conclusion**

With the police report conclusions in mind the Licensing Authority has determined that the red areas be maintained. Merrion Street/Cross Belgrave Street area and the Boar Lane areas will continue to be closely monitored.

The increase in theft and violent crime in the two red areas is concerning. The council will work with the businesses and partners to establish if further work can be done to reduce these crime figures over the next 12 months and to establish if the Purple Ambassador Scheme has a positive effect on reducing low level crime and disorder.

The Licensing Committee will bear in mind that in the next 12 months there may be significant changes to the way late night levies can be introduced and may also consider the option of an early morning restriction order if these figures do not significantly reduce over the next 12 months.

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