

**Report to Regulatory and Appeals Committee 29 September 2016 -
Appendix B - Consultation data and written Submissions**

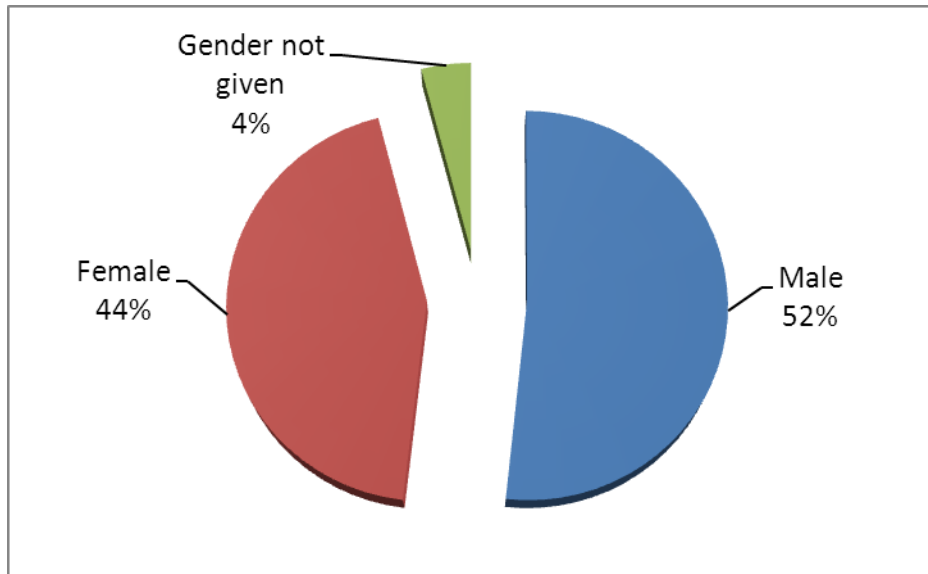
Contents

Contents	Page
1. PSPO Consultation Survey Data	2
2. Written submissions	
a) Police	13
b) Bradford District Chamber of Trade	17

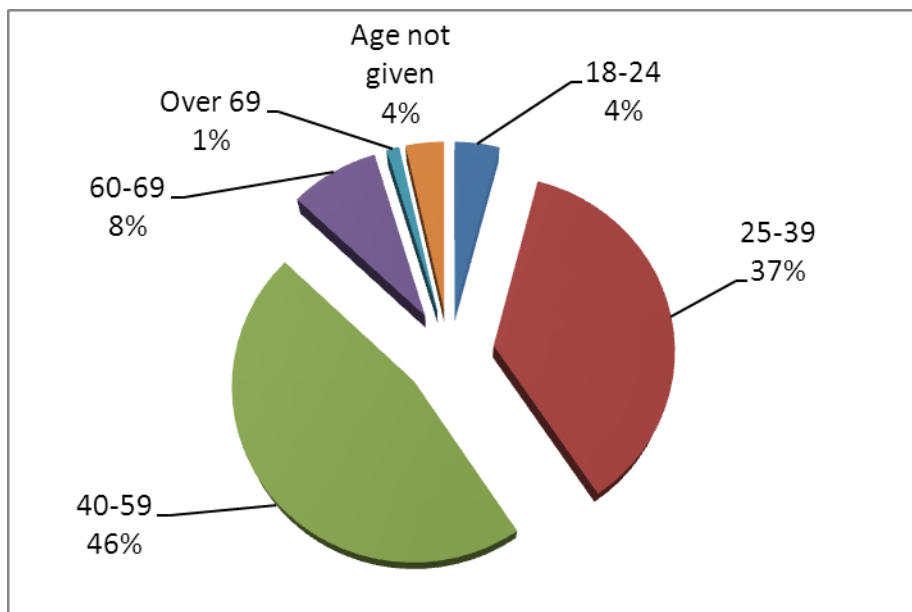
1. PSPO Consultation Survey Data

In total there were 170 responses to the survey (including 5 telephone responses)

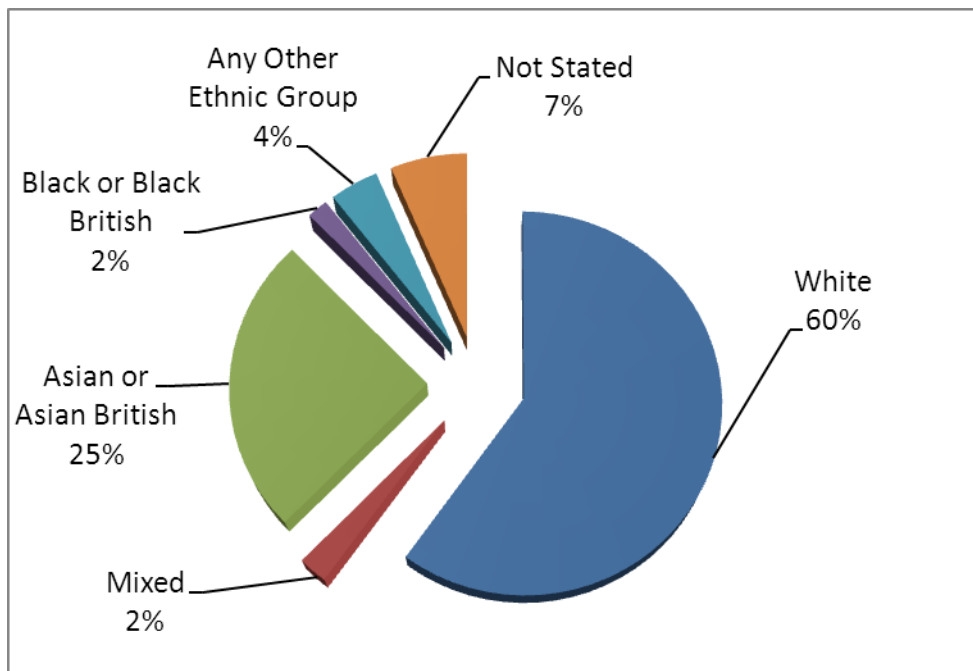
Responses by Gender	Male	Female	Gender not given
	88	75	7



Responses by Age Group	18-24	25-39	40-59	60-69	Over 69	Age not given
	7	62	79	14	2	6

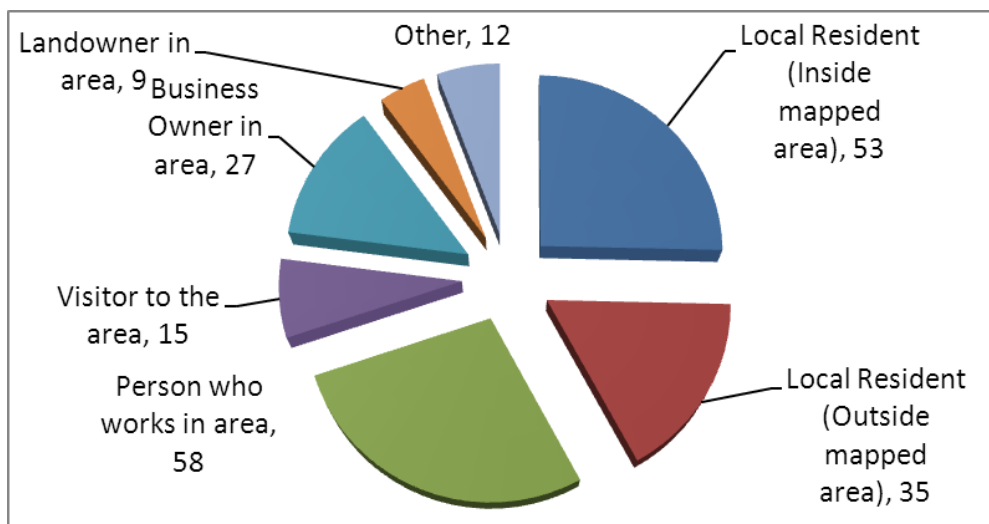


Responses by Ethnicity	White	102
	Mixed	4
	Asian or Asian British	43
	Black or Black British	3
	Any Other Ethnic Group	7
	Not Stated	11



Q1 Are you responding as a

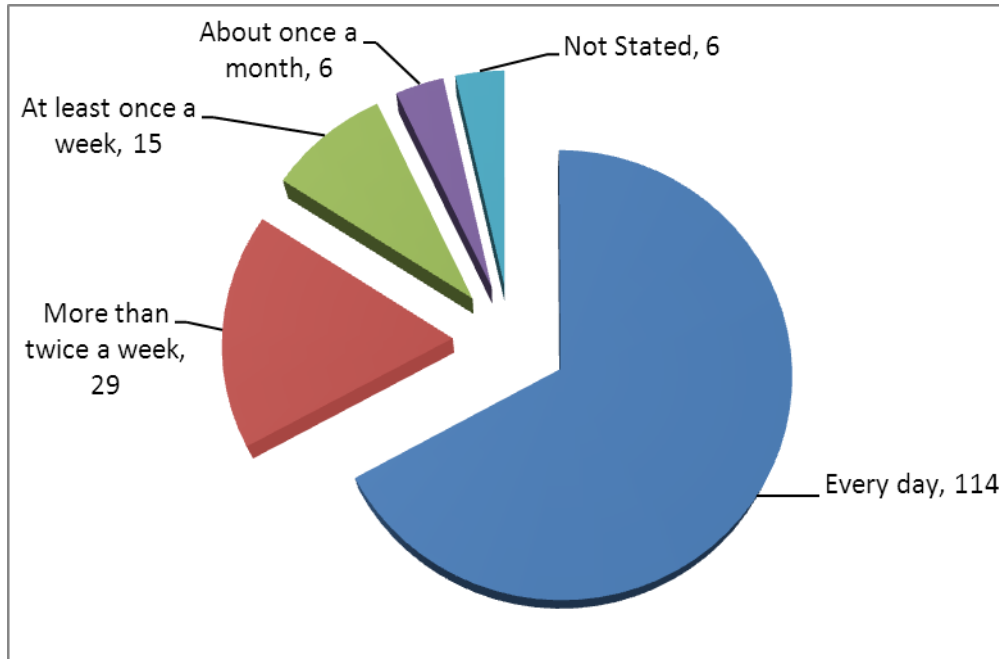
Local Resident (Inside mapped area)	Local Resident (Outside mapped area)	Person who works in area	Visitor to the area	Business Owner in area	Landowner in area	Other
53	35	58	15	27	9	12



*Respondents were asked to choose all that applied

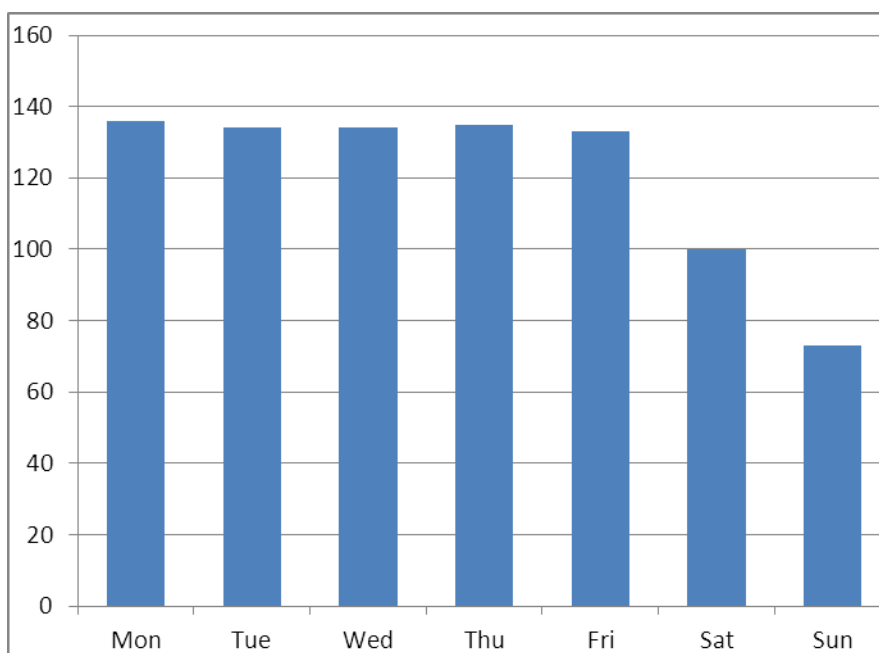
Q2. How often do you visit Bradford City Centre and surrounding area (Exclusion Zone) shown on the map? (Please choose only one option)

Every day	More than twice a week	At least once a week	About once a month	Not Stated
114	29	15	6	6

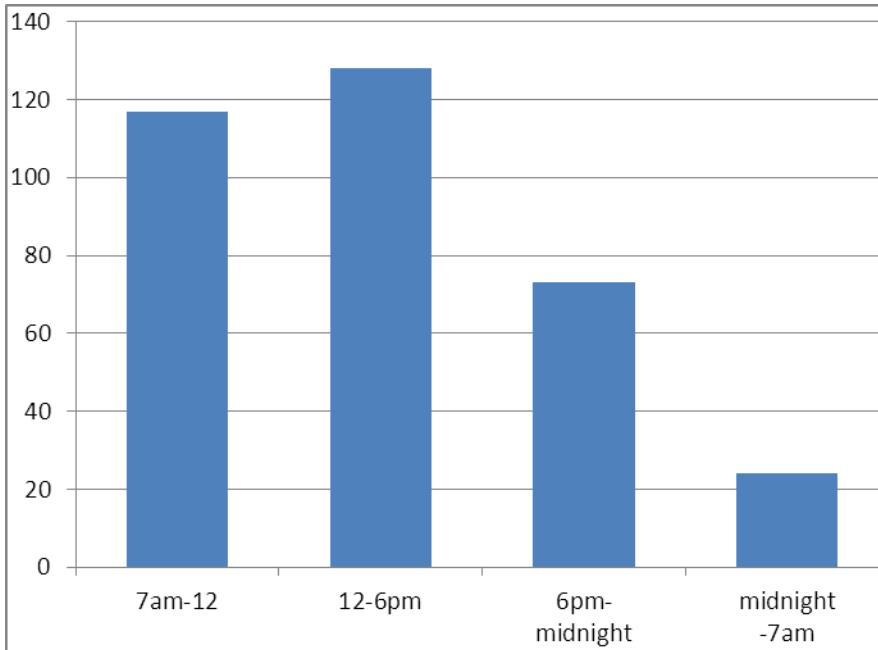


Q3. When do you visit the area shown on the map? (Please choose all options that apply)

Mon	Tue	Wed	Thu	Fri	Sat	Sun
136	134	134	135	133	100	73

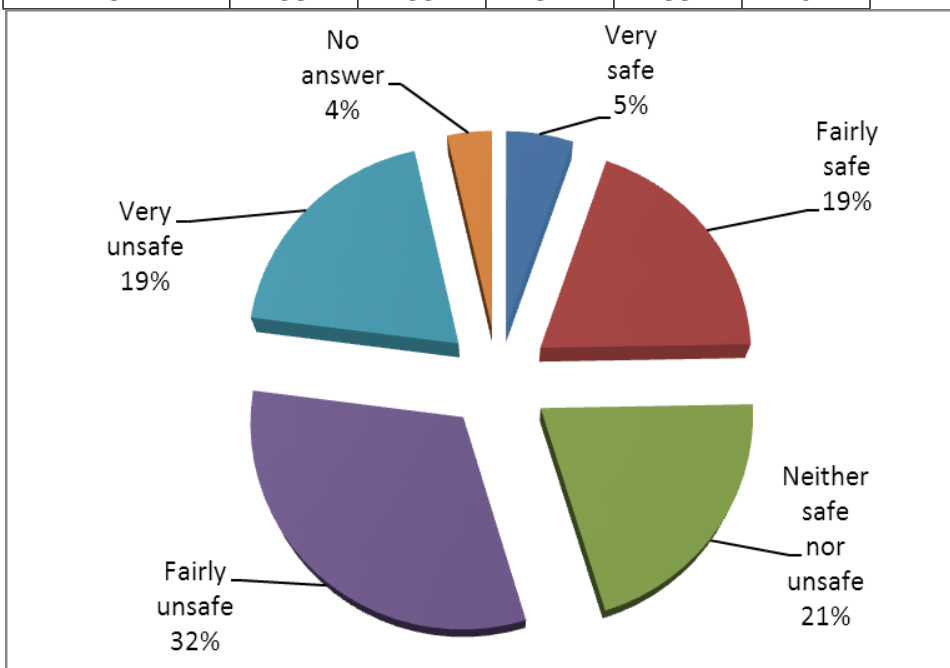


7am-12	12-6pm	6pm-midnight	midnight-7am
117	128	73	24



Q4. How safe do you feel in the area shown on the map?

Very safe	Fairly safe	Neither safe nor unsafe	Fairly unsafe	Very unsafe	No answer
9	33	35	54	33	6



Of the 33 people who replied 'Very unsafe' 15 people left comments on this question, 13 of which stated alcohol/drug issues within the area being the main reason they felt unsafe.

52% of females who answered the survey felt fairly or very unsafe compared to 55% of males.

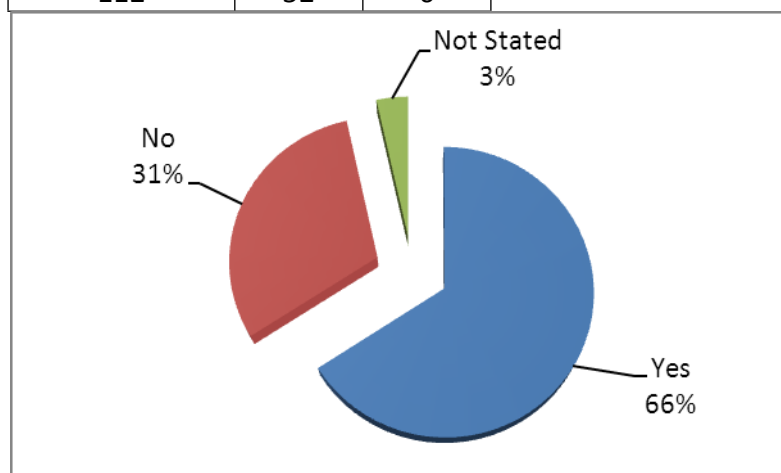
By Age Group	18-24	25-39	40-59	60-69	Over 69	not given
Percentage responding Fairly or Very Unsafe	71%	50%	57%	43%	0%	0%

Please note there were only 7 responses in the 18-24 age group and 2 in the over 69 age group

	Percentage responding Fairly or Very Unsafe
Local Resident in area	59%
Worker	47%
Visitor	33%
Business Owner	65%
Landowner	60%

Q5. Are there some parts of the area shown on the map where you feel less safe than others?

Yes	No	Not Stated
112	52	6

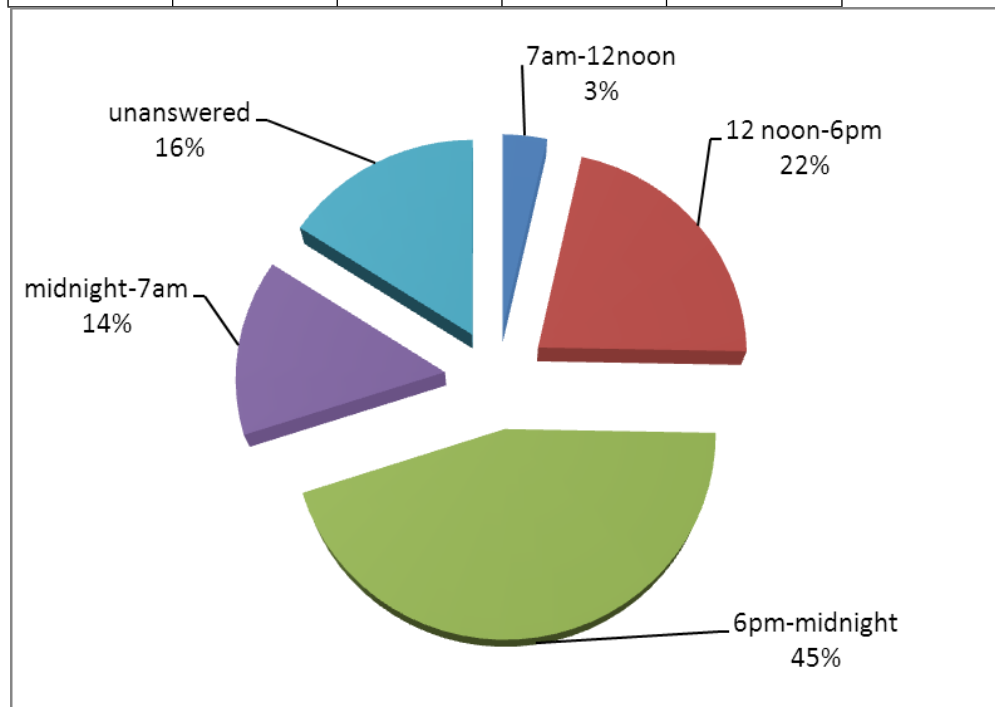


Of the people who commented on the areas that felt the least safe these are the areas that came up the most:

- Centenary Sq
- City Park
- Great Horton Rd / University area
- Hallfield Road/Houghton Place
- Ivegate
- Morley St
- Oastler Centre
- Rawson Road
- Sunbridge Road

Q6. Are there some times of the day or night when you feel less safe than others?

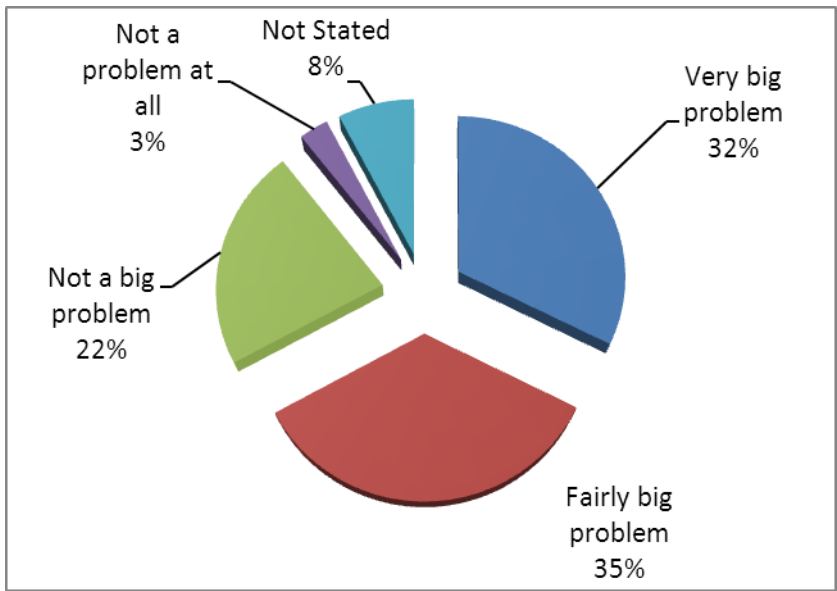
7am-12noon	12 noon-6pm	6pm-midnight	midnight-7am	Not Stated
6	37	76	24	27



Q7. How much of a problem, if at all, do you think each of the following are to people living in, working in, or visiting the area of Bradford shown on the map? (Please choose one option for each row)

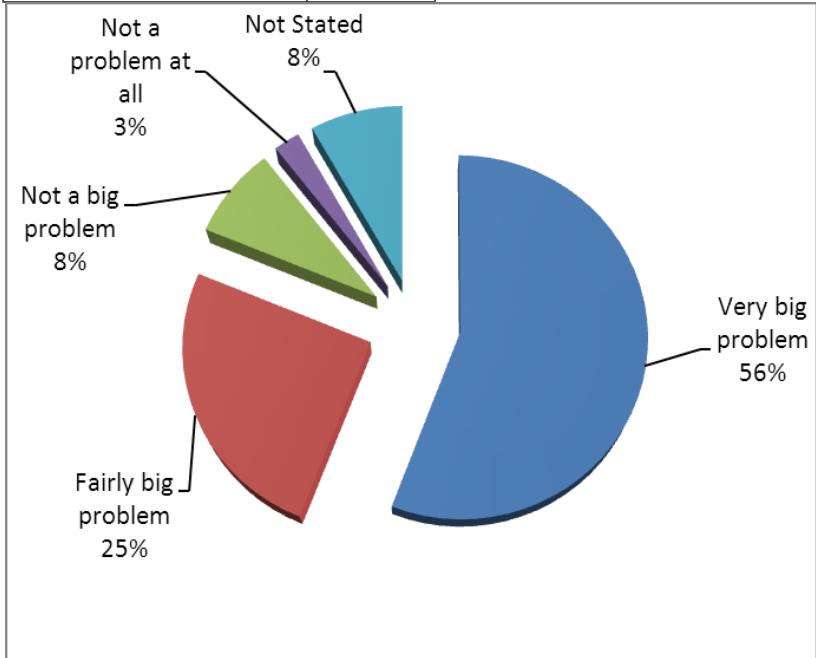
People being rowdy

Very big problem	55
Fairly big problem	59
Not a big problem	38
Not a problem at all	5
Not Stated	13
Total	170



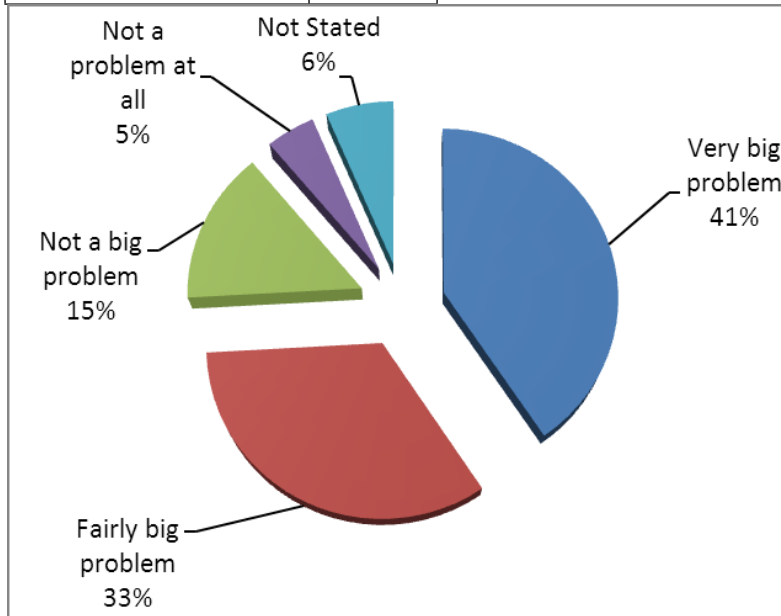
People behaving like they are intoxicated

Very big problem	95
Fairly big problem	43
Not a big problem	14
Not a problem at all	4
Not Stated	14
Total	170



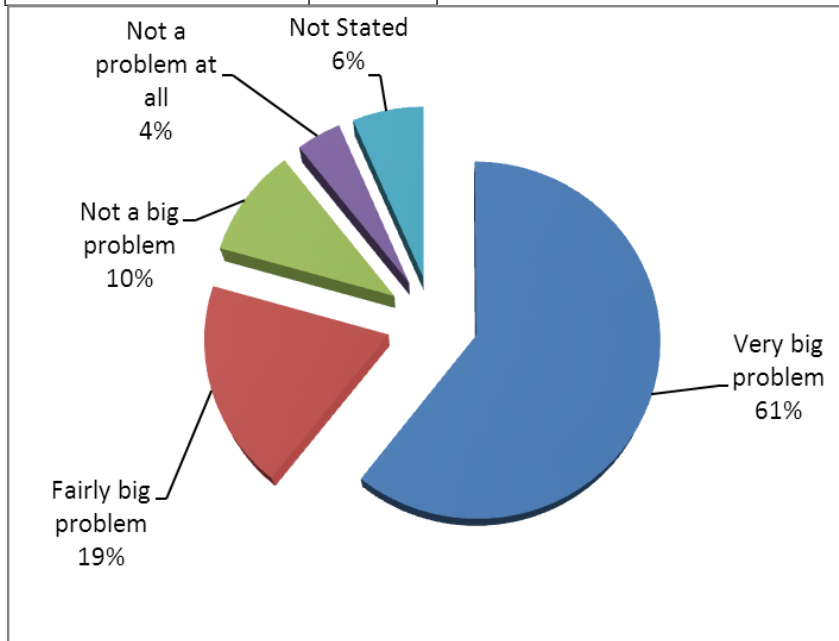
People harassing, intimidating or causing distress to other people

Very big problem	69
Fairly big problem	57
Not a big problem	25
Not a problem at all	8
Not Stated	11
Total	170



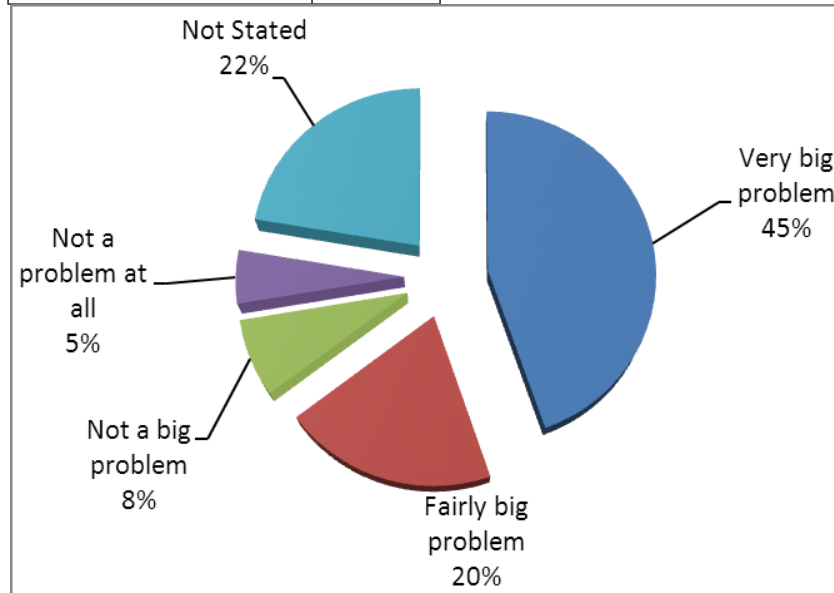
People drinking alcohol in the street

Very big problem	103
Fairly big problem	32
Not a big problem	17
Not a problem at all	7
Not Stated	11
Total	170



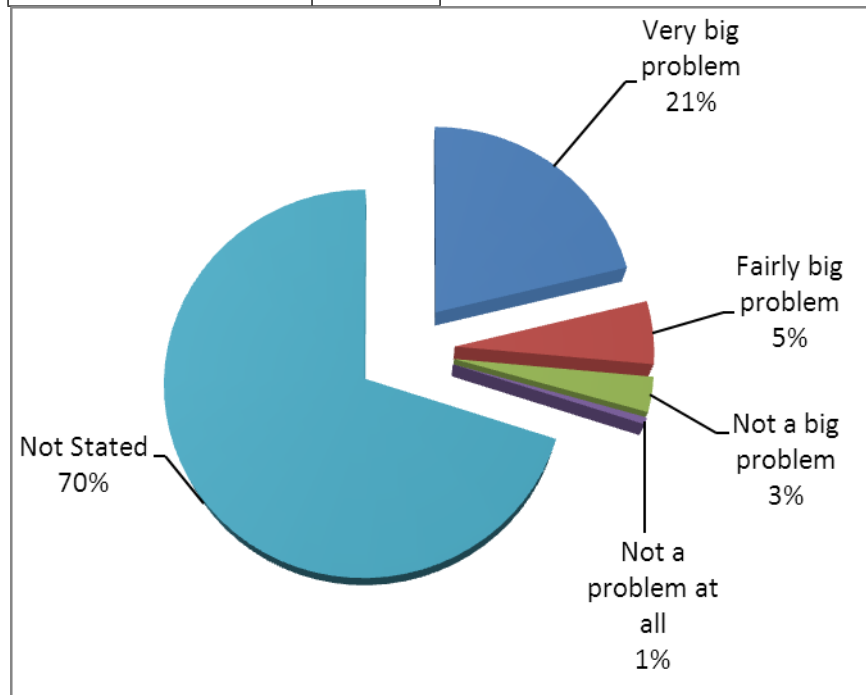
People taking psychoactive substances ('legal highs')

Very big problem	76
Fairly big problem	34
Not a big problem	13
Not a problem at all	9
Not Stated	38
Total	170



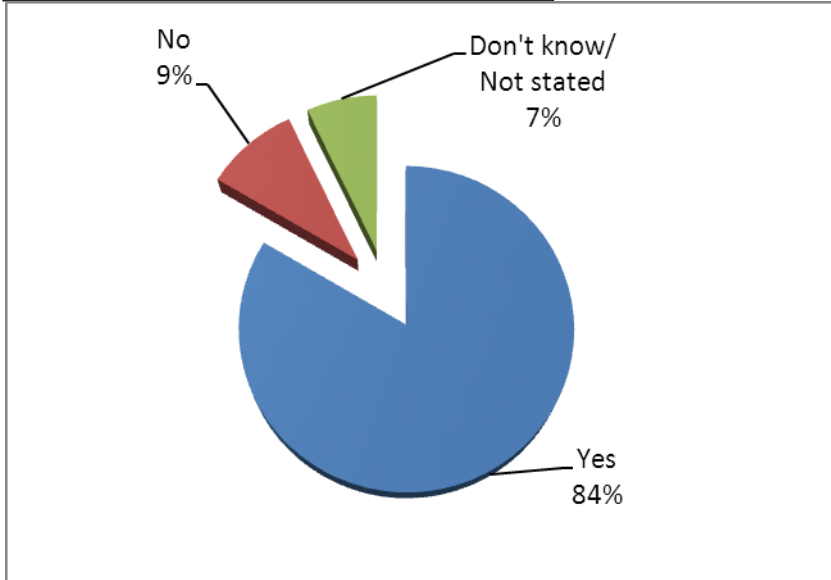
Other

Very big problem	36
Fairly big problem	9
Not a big problem	5
Not a problem at all	1
Not Stated	119
Total	170



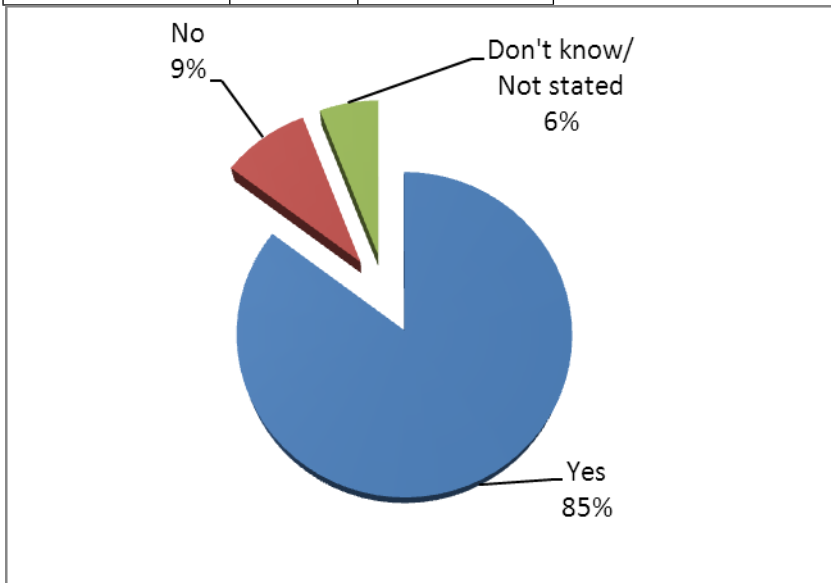
8. Do you support the use of a PSPO to stop people from using intoxicating substances in the area shown on the map?

Yes	No	Don't know/ Not stated
142	16	12



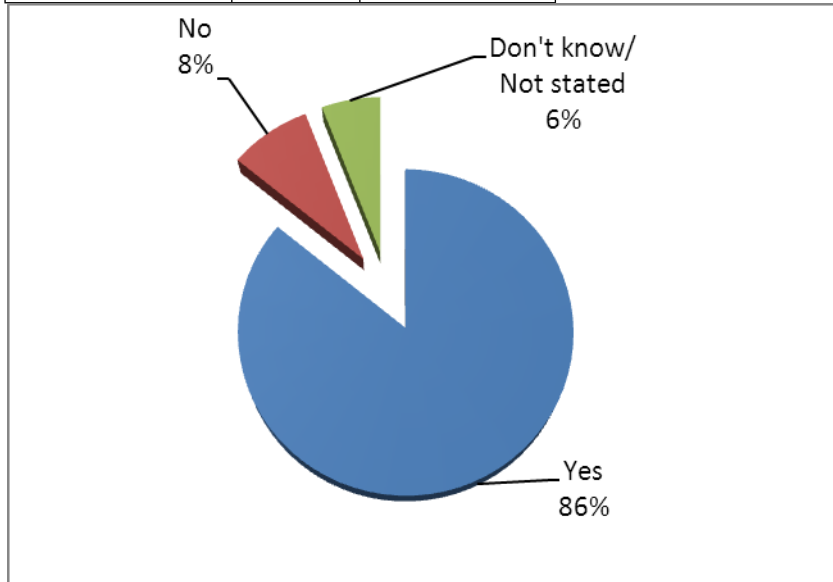
Q9. Do you support the use of a PSPO to stop people continuing to drink alcohol when asked to stop drinking by any authorised officer in the area shown on the map?

Yes	No	Don't know/ Not stated
145	15	10



Q10. Do you support the use of a PSPO to require a person to surrender alcohol at the request of an authorised officer in the area shown on the map?

Yes	No	Don't know/ Not stated
146	14	10



The majority of those responding 'No' to questions 8 through to 10 were local residents.

2. Written submissions

a) Police:

NOT PROTECTIVELY MARKED



Police and Crime Commissioner
for West Yorkshire
Ploughland House
62 George Street
Wakefield
WF1 1DL

Temporary Chief Constable
West Yorkshire Police Headquarters
PO Box 9
Laburnum Road
Wakefield
WF1 3QP

21st June 2016

Steve Hartley
Strategic Director
Department of Environment and Sport
Bradford City Council
BD1 5RW

Dear Steve

Thank you for your letter dated May 17th 2016 inviting West Yorkshire Police and the Office of the Police and Crime Commissioner to consider and be consulted upon proposals for public spaces protections orders (PSPo) in Bradford City Centre and surrounding areas.

We have now had the opportunity to consider these proposals and I have enclosed a response with this letter for your consideration.

Thank you for consulting with us on these proposals and should you require any further assistance Chief Superintendent Atkin will be available to discuss this with you.

Yours sincerely

Dee Collins OPM
Temporary Chief Constable
West Yorkshire Police

Mark Burns-Williamson, OBE
Police and Crime Commissioner
for West Yorkshire

Bradford City Centre PSPO

West Yorkshire Police and the Office of the Police and Crime Commissioner support the introduction of a Public Space Protection Order (PSPO) for the area of Bradford City Centre as defined by the circulated map.

The PSPO will complement the existing intervention work that Bradford City Centre Neighbourhood Policing Team have delivered using Dispersal powers to tackle issues relating to Anti-Social Behaviour, drinking and legal highs. It will also work alongside recent legislation introduced to combat the use of psychoactive substances (legal highs).

Importantly, this power allows Council employees, (or those accredited by the Council) to take enforcement action alongside Police Officers and Police Community Support Officers, allowing both services to publically work together to tackle ASB within Bradford.

Locality of the order

The boundaries of the proposed PSPO is consistent with current Police and partnership intelligence and reported incidents. It also protects areas around Bradford University and Bradford College, and associated residential premises, from potential relocation of anti-social drinking / behaviour should the map have simply involved the regeneration area of Bradford. (This wider area has been included to reflect learning from the implementation of a PSPO in Lincoln where issues were dispersed into residential streets surrounding the order).

Similarly, the residential flats around Manchester Road are included which reflects the wishes of In Communities, (Residential Social Landlord) and allows positive action for any anti-social drinking or use of legal highs in the vicinity of these residences. This ensures wider partnership and community support for the scheme.

Scope and review of prohibited actions

The Bradford Senior Leadership Team acknowledge that the use and preparation of legal highs, and anti-social drinking form the two key areas of reported anti-social behaviour in Bradford centre and fully support these being the key prohibitions for initiating a PSPO.

The 'report on the draft PSPO' notes that a **six monthly review** will be held after the PSPO is launched. The Bradford Senior Leadership Team would fully support a review at this time of both police and partnership intelligence to consider any adjustments to the prohibitions or geographic area covered by the order. For example, a future area that may be suitable for inclusion in the PSPO may be persistent begging. Bradford District Neighbourhood Teams have recently launched a new District wide policy to ensure appropriate support and intervention is offered on a partnership level to anyone who is visibly begging or rough sleeping in Bradford. This policy is shared across the community safety partnership and includes a stepped approach for dealing with those individuals who refuse support and intervention and persistently continue to beg. It is felt that one area for consideration at the six month review would be whether 'persistent begging' could be included within the PSPO if partnership intelligence supports this.

A further consideration for inclusion within the Order would be inclusion of a power for an **authorised person** to dispose of any item that has been surrendered. This prevents the logistical concerns of having to store prohibited items or potentially return at a future date alcohol to persons suffering from alcohol addiction. This suggestion has been raised previously for inclusion by the partnerships Inspector, but does not feature within the draft order circulated.

It is felt that the Bradford City Centre ASB Partnership would be the group best placed to consider and review any amendments at the six monthly juncture.

Positive Partnership Media Strategy

It is important to ensure that public support is maintained for the partnership enforcement of the PSPO. Therefore business and residential users of the city centre should be positively encouraged to share with the Council any positive feedback they have once the PSPO is in force. With approval, this could be shared with the wider public through use of established media, including T&A, Social media and Bradford Online Watch Link through the Bradford District Neighbourhood Support Team. This should positively influence public perception and satisfaction with partnership work in Bradford. Equally, any negative feedback could be incorporated and considered at the six monthly review.

Practical reassurances required from Bradford Council

The short and long term success of the PSPO relies upon active intervention from both Council and Police representatives, ensuring shared demand and a united public approach to tackling ASB in Bradford.

Bradford Senior Leadership Team note the following extract from the 'report on the draft PSPO to regulatory and appeals committee;'

5.11 Bradford Council and Bradford Police have agreed joint responsibility for enforcement. Council ASB (Anti-Social Behaviour) Officers, Police Officers and PCSOs will conduct enforcement patrols and have the power to issue Fixed Penalty Notices for breaches. However the Council's Wardens do not have the equipment or the capacity to do on-street enforcement of this nature due to heightened element of risk to personal safety and therefore additional enforcement activities would not be appropriate for Council staff with their current training and safety measures. Council Wardens who witness contraventions will therefore contact the Council ASB Officer and request their attendance to enforce the PSPO on their behalf.

Bradford Senior Leadership team note that Council Wardens are not currently trained, or in possession of safety measures to allow on-street enforcement. Reassurances are sought that the Council ASB officers will be trained and suitably equipped in time for the launch of the PSPO. There are also some concerns held by the partnerships Inspector that this work may impact upon the superb Criminal Behaviour Order work conducted by the council ASB officers having wider implications on partnership ASB intervention.

It is noted from government PSPO legislation (link; [Home Office web pages](#))

that;

'The FPN can be issued by a police officer, PCSO, council officer or other person designated by the council.'

If there should be a delay in Council ASB officers being suitably trained, provided with safety equipment and supported by Unions to deal with ASB, then a potential stop-gap measure would be for the Council to authorise and designate an individual or company to enforce on their behalf. This could also be considered in conjunction with training Council ASB officers to ensure no detrimental impact to their CBO work.

If this suggestion was followed, Community Safety Funding could potentially be considered to second a Police officer or PCSO, or recruit an enforcement officer (perhaps advertised to existing Special Constables as well as a wider audience) on behalf of the council. This would ensure that an individual with public safety training and appropriate equipment was in a position to enforce on behalf of the council at the commencement of this order ensuring maximum partnership impact.

It is also queried whether long term, an appropriate solution would be to reconsider the powers and remit of Council Wardens, who would provide an appropriate uniformed reassurance and deterrent if they were authorised to issue FPN's in the future.

2. Written submissions
- b) Bradford District Chamber of Trade



Gleave House
91A Victoria Road
Eccleshill
Bradford BD2 2DQ

Tel: 01274 635637

WEB PAGE: <http://www.bradford-chamber-of-trade.co.uk>
EMAIL: thesecretary@bradford-chamber-of-trade.co.uk

Secretary: Val Summerscales

15th June 2016

Steve Hartley
Strategic Director, Environment and Sport
Bradford MDC.,
3rd Floor, Jacobs Well,
Bradford BD1 5RW

Dear Mr Hartley

Re : Proposed - Public Spaces Protection Order (PSPO)
Bradford City Centre and Surrounding Areas.

Following full discussions at our Executive Meeting held on 13th June 2016 - we wish to advise that the Chamber of Trade is fully supportive of the Council obtaining a PSPO to combat anti social activities and behaviour - via the terms set out in the Draft PSPO currently being consulted on.

The Chamber is also fully supportive of the advertised map stating the intended / proposed footprint of the PSPO

Yours sincerely

VAL SUMMERSCALES
SECRETARY