
An Evaluation of Licensing issues and their impact on Policing and Community Safety.

The aim of this Evaluation is:-

To review the current licensing and saturation policy relating to Aylesbury town centre and demonstrate the ongoing concerns of Thames Valley Police in relation to Crime Reduction and Community Safety.

Preface from Superintendent Michael Loebenberg BSc(Hons) MSc, Aylesbury Vale Local Police Area Commander

“This evaluation of current licensing arrangements provides evidence to support the proposed Licensing Policy Statement. We continue to be successful in reducing crime and disorder in Aylesbury Town Centre for which the implementation of such a policy has contributed to the reduction. However, it is important that we are constantly striving to ensure that activity by Thames Valley Police and Buckinghamshire Council is effective in maintaining the safety of our town centre.

The key to effectively managing licensable activities is working in partnership with the Local Authority and key stakeholders such as licensees and members of the community. Working together for the communities of Aylesbury Vale we can protect them from harm and continue to reduce crime, disorder and alcohol related anti-social behaviour.”

Introduction.

During the previous 4 reviews of Aylesbury Vale District Council Licensing Policy Statement, concerns have been raised by Thames Valley

Police and they are still considered important factors when considering the consequences in any expansion of the night time economy in Aylesbury Town Centre.

This report sets out and shows that the above concerns are still important factors when considering the expansion of the late night economy. It not only uses data (crime and disorder figures) but also includes the practical experience of officers who are actually involved in policing the **Night Time Economy**. Statistics alone cannot demonstrate the practical consequences of policing the town centre.

Overview of the Town.

Over the past years the Town Centre of Aylesbury, defined by the area within the ring road, Cambridge Street (Including Cambridge Close), the residential area off New Street and a part of the Queens Park area has undergone some significant changes. New residential developments have been constructed on the Oxford Road/Friarage Road roundabout (Hen and Chickens site), the Oxford Road/Buckingham Street (Ringshall House), and a significant flat conversion on Cambridge Street, New retirement flats have now taken the place of the old cinema. An office block next to Coopers Yard has now been converted into flats; the site of the Britannia public house is now flats. Waitrose and Travel Lodge, and a large Sainsbury's with a significant public realm has evidenced the growth of the town. The current residential population of the town centre stands at approximately 3500 and this does not include the substantial refurbished offices above Friars Square into residential accommodation. Further changes will continue as the town centre expansion continues. The old civic centre has now been demolished and as well as the open planned car park we have a new build comprising of further flats but also new restaurants sit on this site making the Exchange a food led Hub. Also close by is the Waterside development which now incorporates a new modern theatre and is set for further major development. Aylesbury has seen changes in the style of licensed premises within the town with new restaurant style premises increasingly opening and others offering a variety of entertainment.

Whilst the style of premises may have changed over the years, the capacity of the licensed premises within the town centre has increased with the development of the Exchange, the old police station and a new 3 floor premise within Hale Leys. We have seen a slight increase in premises that cater for food being the main part of the operation with no increase in licensing hours. The number of venues that can operate after 11 p.m. at night remains the same. In comparison in 1999 only two public houses operated after 11 p.m. In 2003 this had increased to 14 and in 2010 this had increased to 21. This number is now 27 although a number of premises no longer make use of the full hours on their licences. The capacity of these late night drinking venues remains about the same. Since the introduction of this policy the town centre has seen premises close and re-open.

The town centre also has ten Late Night take-aways. Four of these premises within the town are also restricted to a terminal hour of 3.30am.

The town has always been seen to be a hot spot for policing especially between the hours of 10am and 4pm.

Premises spread sheet Appendix A

Consequences in Policing.

The consequence in Policing terms has been the need to review shift patterns, firstly when the new premises on Exchange Street were opened and again when the Licensing Act came in. These patterns are under constant review. Overlapping shifts are required to cover the peak periods in order to increase available officer numbers, which have become later and later. This has both a human cost to the officers, as well as an increase in costs of overtime, unsocial hours payments and use of police officer on Night Time Economy policing instead of other public priorities.

The Licensing Act 2003 has resulted in licensed premises with longer opening hours and consequently Thames Valley Police have changed shift patterns to cover the problems within the town. This has meant officers working longer hours on busy nights. With limited funds available, pre-planned overtime is not utilised to cover Night Time Economy, meaning hours have been taken from other rosters. Any additional extension to hours of licensed premises within the town centre, over and above the generally accepted 2.30am terminal hour will result in significant costs in overtime, a thorough review of shift patterns and potentially breach Health and Safety Worktime Regulations.

In real terms the actual monetary cost of policing on a Friday and Saturday night includes the need for an overlap shift consisting of two sergeants and nine constables, each working on overlap six hours between 9pm and 3am. This equates to £163,000 per annum. (2015 figure) This does not include any overtime needed to police incidents which extend over normal working hours.

Policing the night time economy places considerable pressure on police resources and can significantly impact on the police's ability to police the local neighbourhood and rural areas. Individual crimes impact massively on the officers having to deal with them. One arrest can take considerable time and resources.

The reality is that the actual hours worked can put pressure on officer's lives. For example consider an arrest at just before 3am involving a violent offence by two persons against another. These two persons will be escorted by four officers. Other officers will be with the aggrieved at the hospital attempting to get a statement if one can be provided. The two persons arrested will go through the custody procedure and also the seizure of exhibits (e.g. clothing) and dependant on whether the offenders are fit for interview an initial interview will take place. If unfit they will be bedded down until they are fit. In any case the arresting officers and any other witnesses will be required to complete statements before going off duty. These statements and a hand over report will be required for who ever takes over the investigation - normally the CID. It is necessarily a long process to ensure legal process and officers often find themselves working beyond when they should have been off duty. At 0700 a new shift will start. CID will pick up the handover sheet and continue with the investigation. Again the number of officers will be dictated by the number on duty. Officers from other areas may/will be required to cover the investigation team's area. This does not include CSI investigation, any bed watches that have to take place, ambulance and hospital statements, CCTV trawl etc. This will no doubt incur overtime by many officers and this cost is not shown anywhere other than to the force.

See officers report attached as appendix B

Cost to victims

It should be noted that not all violent crime or drink related incidents come to the notice of the Police. It is generally accepted that these incidents are under reported and the actual level will be much higher.

The cost to the victims is an important consideration, with some incidents involving multiple victims. Although this report is about Aylesbury Town Centre we should also bear in mind the impact it has outside of this area. Most Domestic Violence occurs in the home and figures show that this happens commonly at weekends after licensed premises have closed. Accident and Emergency departments are stretched during the night-time economy hours and beyond dealing with those that have been involved in incidents connected with alcohol are those that are too drunk to be deemed safe to be left alone.

The impact to other agencies and persons not only in the town should be mentioned as the majority of these emanate from the town.

Domestic Abuse within Aylesbury Vale impacts not only on the victim but other agencies to deal with. For the past year April 2020 to March 2021 recorded offences across Aylesbury Vale of domestic violence were 1409. 169 (12%) of these offences occurred between 10pm and 4am Sunday to Thursday, with 102 (7%) on a Friday or Saturday evening between these hours – it is clear that there is a disproportionate distribution of violence late night on a Friday and Saturday when compared to the rest of the week, affecting domestic violence victims.

The Ambulance Service now stations a responder within the town centre to cater for any incidents, most of which occur at the weekends.

Accident and Emergency at Stoke Mandeville Hospital will then have to deal with any person requiring treatment from injuries/collapse which are presented to them by way of Ambulance service self-admission and in a lot of cases where the police have assisted in taking them, police would be required to remain at A & E if the patient was drunk or causing problems.

Crime and Disorder statistics.

Over the years Thames Valley Police has supplied as part of its evidence to support the Special Saturation Policy statistics taken from our Crime reporting and recording systems. At a number of hearings these figures have been questioned, suggesting they are generic and not showing the true picture. What can be said about the figures are that they are reported upon in the same way each year, taken from the same systems and they break down the same type of offences, the dates and time these offences are committed and the place they are committed. They are not generic figures but well researched and consistently reported. Perhaps more importantly these figures have to be examined alongside the experiences of operational police officers and the other blue light services during the night time economy hours. It is in this context that the numerical value of the statistics can be appreciated. It is the aspiration of all of those concerned with the night time economy to reduce the volume of crime and disorder in the town centre and whilst there have been some successes, nevertheless the experience of the police has not warranted a reduction in police resources during the past years. It can be seen that alcohol plays a large part in crime and disorder within the town during the Night time economy. During the year of the pandemic we can see that very few problems occur as alcohol was not freely available.

Figures are attached as appendix C

Conclusion

Apart from policing, in real time Aylesbury's night time economy, the Police do actively influence the town centre through Planning and Licensing processes and play an important part of wider community safety initiatives and partnerships. Experience has shown that a policy that deals effectively and honestly with trading hours not only contains crime and disorder but provides a fair and transparent trading environment. Historically, for example the Police have successfully opposed extending Sunday Licensing hours. Consequently, whilst other nights have experienced increasing problems and violence, Sunday nights have remained relatively trouble free. With many years' experience it can now be seen that the Council's special saturation policy has effectively managed trading hours and number and type of premises. A policy not dealing effectively and honestly about trading hours can have a detrimental effect upon Community Safety.

It is felt that the proposals contained in the Licensing Act 2003, give significantly more weight to these issues. The Act lists 4 'Licensing objectives' :-

- A. The prevention of Nuisance
- B. The protection of children from harm
- C. The protection of public safety and
- D. The prevention of crime and disorder.

The latest and historic analysis supports an ongoing policing operation in relation to the night time economy termed 'Nightsafe' designed to tackle anti-social behaviour and crime and disorder. Every week both the police and licensing authority debrief the previous weekend, including an evaluation of offences, arrests, use of dispersal powers, penalty notices and discuss reports submitted by police officers relating to incidents in licensing premises (GEN40) and tasked visits. The forthcoming weekend is carefully planned and discussed.

Since the new licensing act has come into force partnership working has grown and together with the right decisions being made by sub-committees, a combination of enforcement work with Responsible authorities and the town Pubwatch scheme, the use of Street Angels and a weekly, carefully planned evaluation of Aylesbury's night time economy is seen as paying dividends.

The police and its partners have and continue to explore new initiatives to manage a safe and successful night time economy.

Policy Proposals Appendix D.

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Appendis A

Aylesbury	25/05/2021														
		Alcohol	Close	Alcohol											
Name	Address	Monday		Tuesday		Wed		Thursday		Friday		Saturday		Sunday	
Bell	Market Square	07.00 - 00.00	00.30	07.00 - 00.00	00.30	07.00 - 00.00	00.30	07.00 - 00.00	00.30	07.30 - 01.30	02.30	07.30 - 01.30	02.30	07.00 - 00.00	00.30
Manor	Hale Leys	10.00-00.00	00.30	10.00-00.00	00.30	10.00 - 00.00	00.30	10.00-00.00	00.30	10.00 - 00.00	00.30	10.00 - 00.00	00.30	10.00-00.30	23.00
Carlos	7-11 Temple Street	09.00 - 01.00	01.30	09.00 - 01.00	01.30	09.00 - 01.00	01.30	09.00 - 01.00	01.30	09.00 - 01.30	02.00	09.00 - 01.30	02.00	09.00 - 23.00	23.30
White Hart	Unit 4 The Exchange	11.00 - 02.00	02.30	11.00 - 02.00	02.30	11.00 - 02.00	02.30	11.00 - 02.00	02.30	11.00 - 02.00	02.30	11.00 - 02.00	02.30	11.00 - 00.00	00.30
Emperor	Buckingham Street	10.00 - 01.30	02.00	10.00 - 01.30	02.00	10.00 - 01.00	01.30	10.00 - 01.00	01.30	10.00 - 02.00	02.30	10.00 - 02.00	02.30	11.00 - 00.00	00.30
Rococo	The Exchange	09.00-00.00	00.30	09.00-00.00	00.30	09.00-00.00	00.30	09.00-00.00	00.30	09.00-00.00	00.30	09.00-00.00	00.30	09.00-00.00	00.30
Harrow	4 Cambridge Street	10.00 – 00.00	01.00	10.00 – 00.00	01.00	10.00 – 00.00	01.00	10.00 - 01.00	02.00	10.00 - 01.30	02.30	10.00 - 01.30	02.30	10.00 - 00.00	01.00
Fever & Cirque	14 Kingsbury	11.00 - 02.00	02.30	11.00 - 02.00	02.30	11.00 - 02.00	02.30	11.00 - 02.00	02.30	11.00 - 02.00	02.30	11.00 - 02.00	02.30	12.00 - 22.30	00.00
Wagamamma	Unit 3 The Exchange	10.00 - 02.00	02.30	10.00 - 02.00	02.30	10.00 - 02.00	02.30	10.00 - 02.00	02.30	10.00 - 02.00	02.30	10.00 - 02.00	02.30	10.00 - 00.00	00.30
Kings Head (Courtyard)	Market Square	10.00 - 23.00	00.00	10.00 - 23.00	00.00	10.00 - 23.00	00.00	10.00 - 23.00	00.00	10.00 - 23.00	00.00	10.00 - 23.00	00.00	10.00 - 23.00	00.00
Kings Head (Farmers Bar)	Market Square	10.00 - 00.00	00.00	10.00 - 00.00	00.00	10.00 - 00.00	00.00	10.00 - 00.00	00.00	10.00 - 00.00	00.00	10.00 - 00.00	00.00	10.00 - 00.00	00.00
Pulse 51	1 Silver Street	07.00 - 03.00	3:30	07.00 - 03.00	03:30	07.00 - 03.00	03:30	07.00 - 03.00	03:30	07.00 - 03.00	03:30	07.00 - 03.00	03:30	07.00 -03.00	03:30
Feathers	Kingsbury Court, Kingsbury	08.00 - 01.00	01.30	08.00 - 01.00	01.30	08.00 - 01.00	01.30	08.00 - 02.00	02.30	08.00 - 02.00	02.30	08.00 - 02.00	02.30	08.00 - 00.00	00.30
Niche	1A-3A Market Square	10.00 - 01.40	1:40	19.00 - 01.40	01:40	10.00 - 01.40	01:40	10.00 - 01.40	01:40	10.00 - 02.00	02:00	19.00 - 02.00	02:00	19.00 - 22.30	22.30
Green Man(closed)	Market Square	07.30 - 00.00	00.30	07.30 - 00.00	00.30	07.30 - 00.00	00.30	07.30 - 01.00	01.30	07.30 - 01.00	01.30	07.30 - 01.00	01.30	12.00 - 22.30	00.00
Peking Inn	Cambridge Place	12.00 - 00.00	00.00	12.00 - 00.00	00.00	12.00 - 00.00	00.00	12.00 - 00.00	00.00	12.00 - 00.00	00.00	12.00 - 00.00	00.00	12.00 - 00.00	00.00
Queens Head	Temple Square	10.00 - 00.00	00.30	10.00 - 00.00	00.30	10.00 - 00.00	00.30	10.00 - 01.00	01.30	10.00 - 02.00	02.30	10.00 - 02.00	02.30	12.00 - 23.30	23.30
Rockwood	32 Kingsbury	10.00 - 23.00	23.30	10.00 - 23.00	23.30	10.00 - 23.00	23.30	10.00 - 01.00	01.30	10.00 - 01.00	01.30	10.00 - 01.00	01.30	12.00 - 22.30	23.00
Mirage	39-41 Buckingham St	12.00 - 02.15	02.30	12.00 - 02.15	02.30	12.00 - 02.15	02.30	12.00 - 02.15	02.30	12.00 - 02.15	02.30	12.00 - 02.15	02.30	12.00 - 23.30	23.00

Appendix B

Appendix B

THAMES VALLEY POLICE

Subject :

Division/Station : Town Centre N/Hood Officer

From : PC David Grainger

To : Licensing Officer

Ref : Night Time Economy

Date : 2nd June 2021

Tel.No.

Aylesbury Town Centre Night time Economy

Aylesbury town centre has a number of pubs, bars, restaurants and clubs that attract a large number of people from both the town and surrounding villages and towns.

Traditionally this has been policed on Friday and Saturdays with a dedicated shift allocated to the town centre. On both these dates the town starts from late afternoon where drinkers will stop after work and have a few drinks. The pubs etc will do a steady and constant trade until about 21:00 or so where the clientele change.

Up to this time there are normally a few drinkers that cause issues that the police are called to.

Some of the earlier drinkers would go home whilst others would move to clubs such as Fever and Mendoza's etc before moving to other clubs later on at the end of the night, Mirage, Emperor's Fever.

Between roughly 21:00 hours and midnight, the demand on police increases as the intoxication levels increase. There are also a large number of people that due to the current climate drink at home and then come to the town to finish their evening in a club. These people too tend to be very drunk. There is normally an increased police presence in the town after 23:00 hours.

When pubs such as The White Hart close, the drinkers all move into town and the clubs get busy such as The Emperors and Mirage which tend to be the last places to go to as they open late. As the hours tick by into the early hours, there is a bigger demand on police until places such as Emperors and Mirage close but this causes a bigger demand on police. Normally the town centre shift is finished by 03:00 hours but history has shown that the disorder increases past that hour and can go to 04:00 or 05:00 in many cases. The issue being that the drinkers have no more venues to go to, they remain in the town and do not disperse which leads to arguments and disorder. In summary, the policing demand from the town centre increases as the hours go by each Friday and Saturday.

The severity of assaults also increases with the more serious assaults occurring later on in the early hours. Some venues have been very good at assisting the

police once their customers have left such as Fever, whose staff would go out onto Kingsbury and actively assist the police and deal with their customers. Sadly the norm is for the venues to close their doors as soon as they are shut to leave a large number of intoxicated people on the streets for the police to have to deal with the consequences there after.

Appendix C.

Alcohol Related Disorder in Aylesbury Town Centre 2018- 2021

Introduction

This report aims to analyse data in relation to alcohol disorder in Aylesbury Town Centre for the period 2018-2021 for each 24 hr day. And will show recorded offences/incidents in the locations of Kingsbury, Market Square, Cambridge Street, Cambridge Close, Cambridge Place and Exchange Street, which are all located in the town centre. These areas are where there is predominantly the highest amount of licensed premises in the Town Centre.

This report sources its data from the TVP crime recording system, and will consider the offences of:

- ABH
- Assault Police
- GBH
- ASB Offences
- Public Order
- Sexual Offences
- Common Assault

Aylesbury Police Evidence Saturation Policy Data

Requested by Trevor Hooper and Insp G Horton

Slides Showing:

Slide 2: Breakdown of offences by type

Slide 3: Offences by day of the week

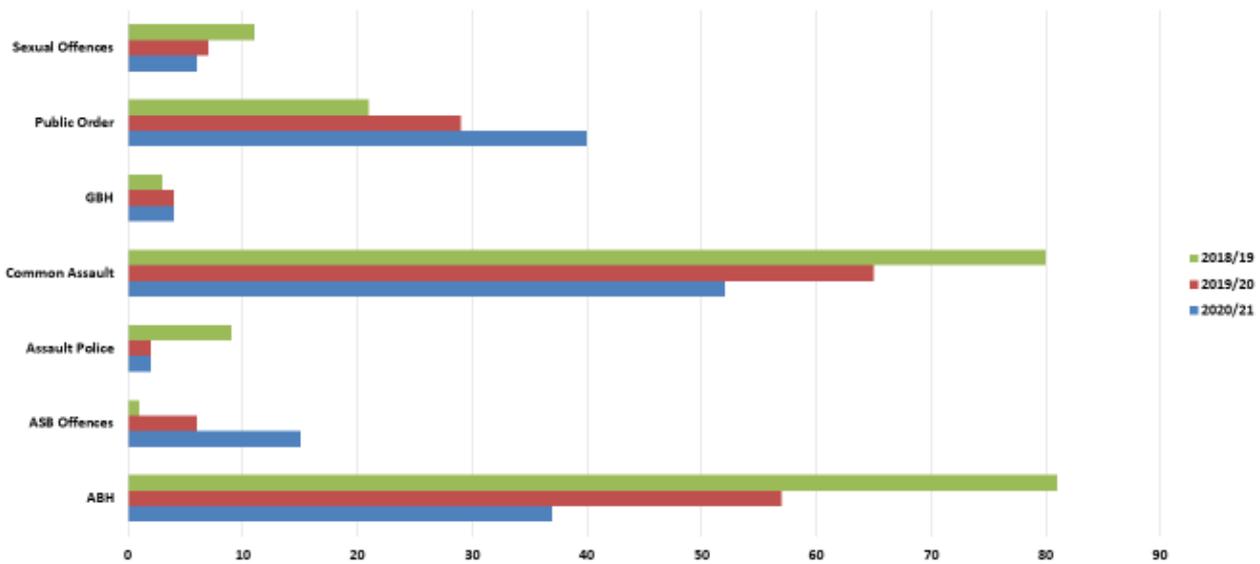
Slide 4: Breakdown of offences by street

Slide 5: Offences by time period

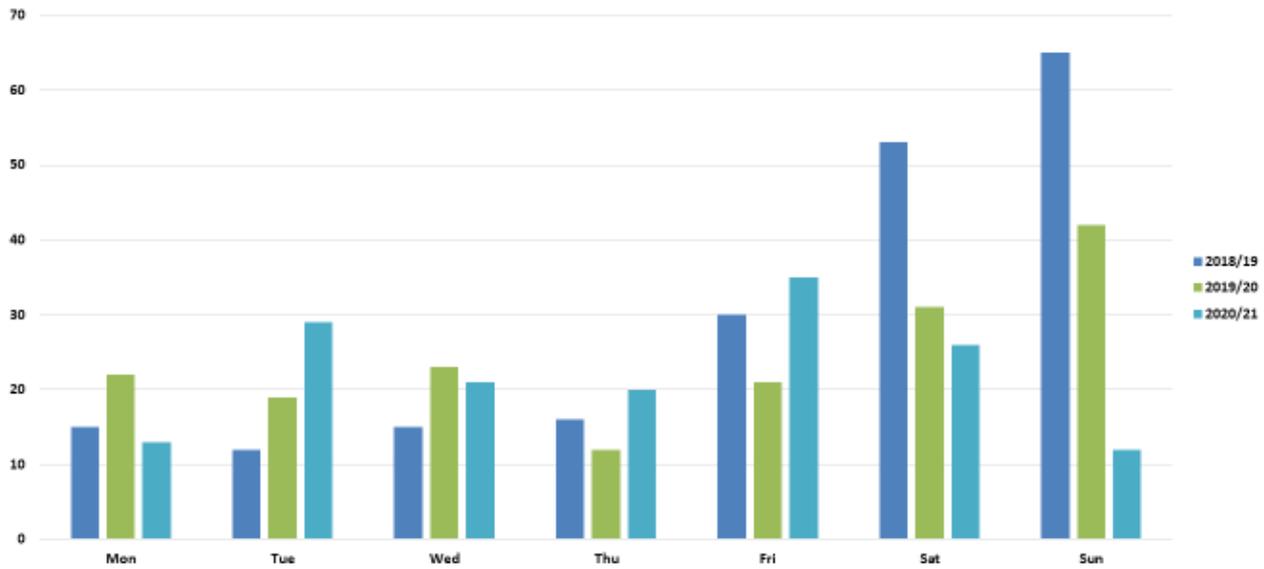
Methodology

All data has been gained from Niche using the iBase database. The time period is from 01/04/2018-31/03/2021 to ensure complete years. The locations are based on streets of interest as set out in slide 4.

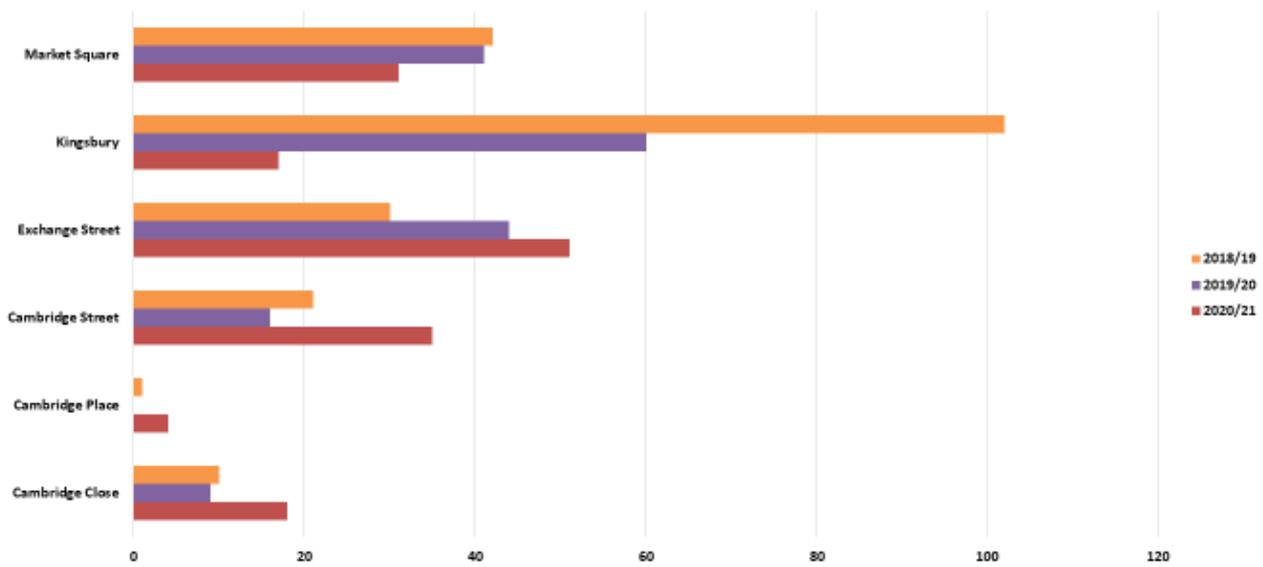
These are all within Aylesbury Town Centre. The offences have been grouped into 7 groups, researched using multiple Stats Class Descriptions that meet the overall threshold. These offence types can be provided if required.



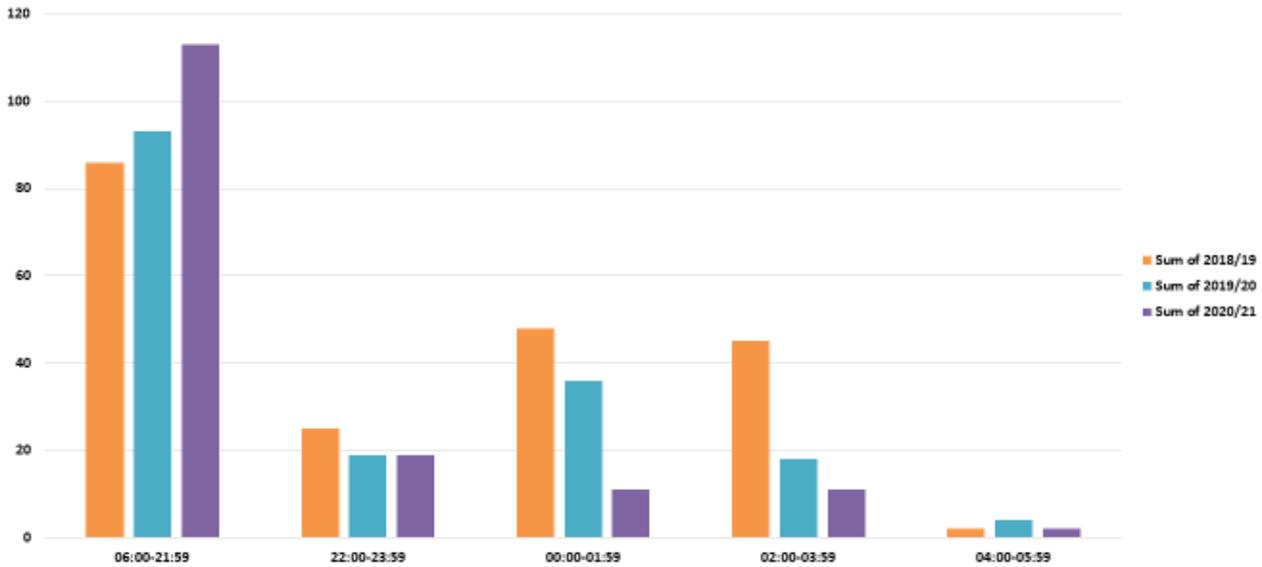
Offence Type	2018/19	2019/20	2020/21	Grand Total
ABH	81	57	37	175
ASB Offences	1	6	15	22
Assault Police	9	2	2	13
Common Assault	80	65	52	197
GBH	3	4	4	11
Public Order	21	29	40	90
Sexual Offences	11	7	6	24
Grand Total	206	170	156	532



Day	2018/19	2019/20	2020/21	Grand Total
Mon	15	22	13	50
Tue	12	19	29	60
Wed	15	23	21	59
Thu	16	12	20	48
Fri	30	21	35	86
Sat	53	31	26	110
Sun	65	42	12	119
Grand Total	206	170	156	532



Street	2018/19	2019/20	2020/21	Grand Total
Cambridge Close	10	9	18	37
Cambridge Place	1	0	4	5
Cambridge Street	21	16	35	72
Exchange Street	30	44	51	125
Kingsbury	102	60	17	179
Market Square	42	41	31	114
Grand Total	206	170	156	532



Time Period	2018/19	2019/20	2020/21	Grand Total
06:00-21:59	86	93	113	378
22:00-23:59	25	19	19	63
00:00-01:59	48	36	11	95
02:00-03:59	45	18	11	74
04:00-05:59	2	4	2	8
Grand Total	206	170	156	532

Appendix D.

Policy Proposals

Although this report shows a slight decrease in town centre incidents it still shows a clear link between violent crime and the changing profile of licensed premises in Aylesbury Vale, it is recommended that the following control measures stay in place, when granting licenses under the new Act.

The following table shows a list of control measures and reasons justifying each. Many of these have been tried and found to be effective..

Control Measure	Reason
Alcohol free Zone (Designated Public Place Order)	<p>Aylesbury Town Centre as defined by the inner relief road and some areas of Buckingham Town are designated areas in relation to the consumption of alcohol in public. Any changes of use in relation to</p> <p>Licensed Premises in this area need to take into account that it may reduce the effectiveness of this existing control measure. For example the sale of alcohol from tables and chairs situated on the Highway.</p>
<p>Ensure drinking outside and in view of the public is:-</p> <ol style="list-style-type: none"> 1. Enclosed, using robust system that is removed when not in use (7 a.m. to 9 p.m.) 2. Ancillary to a table meal. 3. Served to table. 4. No bottles to be served outside. 5. Stopped by 9 p.m. 6. Fully within view of the Town Centre CCTV system. 	<ol style="list-style-type: none"> 1. There is a need to provide clear demarcation between areas where drinking is or is not allowed. 2. Alcohol served as ancillary to a meal will reinforce the changing drinking culture to a Café style, rather than simply extending traditional drinking culture into the street. 3. Operator to provide waiter/ waitress service to tables outside will not only ensure that management provides adequate monitoring of their premises, but also that the space is used as intended. 4. By avoiding the use of bottles or breakable glass outside, the risk of violence and injury will be minimised. See below. 5. Most late night venues have to employ door staff from 7pm to provide adequate control at the point of entry, it therefore follows that tables and chairs situated outside this area of control should be removed. 6. Such areas need to be planned and considered with reference to the CCTV coverage, and extra cameras funded by the applicant where necessary.
Encouragement of complementary activities eg Restaurants, Cafés, Family venues, Jazz Clubs, Comedy Clubs, Theatres.	Aylesbury Town Centre is dominated by youth focused venues. A new Licensing Policy should encourage the development of complementary uses. See also comments under the saturation policy.
The number and location of food vans	Such facilities need to be located with care to avoid close proximity to other venues or gathering points such as Taxi ranks, to avoid rubbing points which could increase tension within groups already under the influence of alcohol.
<p>Expansion of town centre CCTV system.</p> <p>Installation of CCTV in licensed premises.</p>	<p>A long term strategy part funded through Sec106 contributions.</p> <p>CCTV in licensed premises is seen as good practice for community safety in particular the detection and prevention of crime. Licensed premises unless there are good reasons, should be equipped to a standard and in a manner in accordance with the established Thames Valley Police guidance on installing CCTV.</p>
Lighting proposals	A further long term strategy for lighting should be used to reduce the fear of crime, but also to help in the identification of offenders and enhance the picture quality of CCTV.
Street Urination is a concern especially in shop doorways and alleyways. Many areas install temporary urinals or even ones that rise up at night .	A Policy should be considered to ensure that adequate ground floor toilets are provided within each establishment, where this is not practical a contribution should be required to pay for the provision and maintenance of public facilities.
Pub Watch Membership	Pub watch schemes are considered to be best practice, and should be supported by Thames Valley Police and the Licensing Authority Links with the scheme are already maintained through the provision of a Police Liaison Officer. This policy should encourage voluntary active

	membership of pub watch, including the proper use of the radio/pager system where provided.
A more restrictive Policy in relation to trading hours for high risk premises	Contrary to central Government advice customers do not disperse gradually from premises but leave on masse between last sale of alcohol and closure of the premises..
Drugs Policy	Applicants should be required to adopt an appropriate policy. They should undertake a risk assessment; maintain an incident book to record relevant events. They should be aware of and follow the advise published by the Portman Group "Safer Clubbing" & Government Guidance.
Sundays Policy	Existing licensing hours which have restricted the Sunday trading have proved effective in maintaining lower levels of violent crime and antisocial behaviour. Existing local authority and Police resources do not have the capacity to accommodate later hours on this day of the week. The Aylesbury Town Centre is home to approx. 3500 residents, and many more live just outside the inner relief road. This number is increasing as the new building continues.
Door Supervisors	Late night licensed premises providing music or other entertainment should employ properly registered and trained door staff, who can deal with public order incidents. Clear operational guidelines should be issued for each venue setting out their role and responsibilities, including how they record violent and drug related incidents. See also Drug Policy.
Provision of internal tables and chairs.	To prevent the domination of 'Vertical Drinking' the provision of a reasonable proportion of tables and chairs for customers. e.g. 25 % trading floor area.
Standards of management	Experience shows that good and robust management is key to safe premises and the police would seek evidence of that for high risk premises.