



# PLANNING FOR OUR NIGHT TIME ECONOMY:

**A DISCUSSION PAPER ON POTENTIAL STRATEGIES TO  
ENHANCE THE SAFETY, VIBRANCY AND FUNCTION OF  
YARRA'S ENTERTAINMENT PRECINCTS, FROM  
TWILIGHT TO DAYBREAK.**

The City of Yarra is renowned for its dynamic night life spread across several precincts, principally Collingwood and Fitzroy (Smith, Gertrude, Brunswick and Johnston Streets) and Richmond (Victoria, Church and Swan Streets).

However, the nature and intensity of this activity can negatively impact upon the local community through noise, litter and matters of public nuisance.

This paper examines obstacles to amenity at night and considers strategic opportunities to keep Yarra safe, vibrant and functional.

Council seeks the views of residents, traders and visitors, alongside those of industry, government and experts, as how best to manage our night time economy. It is hoped that this discussion paper will stimulate conversation between stakeholders and lead to shared solutions.



## Contents

1. Executive Summary .....	4
2. Introduction .....	5
2.1. Purpose .....	5
2.2. Contents .....	5
2.3. Project Milestones .....	6
3. Yarra Fast Facts .....	7
4. About Yarra’s Night Time Economy (5pm to 9am) .....	8
4.1. Where is the heart of Yarra’s nightlife? .....	10
4.2. Why is safety an issue in Yarra’s night time economy? .....	12
5. To what extent are Yarra’s night entertainment precincts safe and functional?.....	13
5.1. Introduction .....	13
5.2. Safer people and vehicle movement .....	14
5.2.1. Context .....	14
5.2.2. Evidence & experiences elsewhere .....	14
5.2.3. Opportunities .....	15
5.3. People getting home safely.....	15
5.3.1. Context .....	15
5.3.2. Evidence & experiences elsewhere .....	16
5.3.3. Opportunities .....	17
5.4. Enhance safety and appearance of public spaces used at night .....	19
5.4.1. Context .....	19
5.4.2. Evidence and experiences elsewhere.....	20
5.4.3. Opportunities .....	21
5.5. Increase diverse night activities in Yarra .....	23
5.5.1. Context .....	23
5.5.2. Evidence and experiences elsewhere.....	23
5.5.3. Opportunities .....	24

5.6.	Clearer expectations on acceptable noise levels .....	25
5.6.1.	Context .....	25
5.6.2.	Evidence & experiences elsewhere .....	26
5.6.3.	Opportunities .....	27
5.7.	Minimise anti-social behaviours and negative perceptions associated with night activities .....	28
5.7.1.	Context .....	28
5.7.2.	Evidence and experiences elsewhere.....	29
5.7.3.	Opportunities .....	29
6.	Conclusion.....	32
7.	Have your Say .....	33
8.	References .....	34
9.	Appendices .....	36
9.1.	Table 1. Total employment of Yarra Night Time Economy –related Industries.....	36
9.2.	Background Paper: Safe Taxi Rank Schemes in Victoria .....	37
9.2.1.	References .....	40
9.3.	Background Paper: Identification (ID) Scanners in Licensed Venues .....	41
9.3.1.	References .....	44

### Case Studies

Safe taxi rank schemes .....	19
Night time waste collection and cleansing service UK.....	23
The Norwich SOS Bus Project .....	31
Identification scanners in licensed venues.....	32

### Figures

Figure 1: Project Milestones.....	6
Figure 2: Key night entertainment precincts in Yarra .....	10
Figure 3: Noise complaints reported to Yarra City Council in 2012 .....	25

## 1. Executive Summary

By night in the City of Yarra (Yarra), you can find a vibrant atmosphere to have a meal, drink, listen to music and experience other forms of entertainment.

A lively night life can also on occasion make for unsafe behaviour and feelings of reduced personal safety. For example, anti-social behaviour, injury or assault from excessive alcohol drinking or excess noise from nearby activity, decrease everyone's enjoyment of the local area.<sup>1</sup> Perceptions of safety are often lower for residents and visitors who have experienced these issues (Metropolis Research, 2012: 50).

Safe experiences at night and enjoyment of local neighbourhood will grow in importance to community if the anticipated 20,000 new residents settle in the next 15 years in Yarra (.id, 2011), some close to night entertainment precincts.<sup>2</sup> More new residents, means more visitors. Visitors expect an enjoyable and safe place where transport is available and they do not encounter any threatening behaviour.

This Paper aims to encourage community discussion about how Yarra's night entertainment precincts can be both vibrant and safe places. What influences night entertainment precincts to be safe and functional is discussed including:

- the ease of people and vehicles moving within the centres;
- the appearance of public places used at night;
- the diversity of night time activities available;
- unreasonable noise close to residential homes; and
- anti-social behaviour and negative perceptions associated with night activities.

These five topics are then considered in terms of:

- what other cities do to make their night entertainment precincts safe; and
- what opportunities there are for Yarra City Council and the local community to ensure a safe and enjoyable Yarra nightlife for visitors and residents?

Throughout the Paper there are questions to elicit community's ideas to improve safety, vibrancy and functionality in Yarra's night entertainment precincts.

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<sup>1</sup> Amenity means the things that people appreciate about their urban environment. Amenity can be tangible like a shopping centre or a park, and it can be an intangible thing, like a feeling of safety or sense of community

<sup>2</sup>Night entertainment precincts, refers to a concentration of businesses in a street open after 5pm.

## 2. Introduction

### 2.1. Purpose

This Discussion Paper aims to encourage community discussion about how to improve safety, functionality and vibrancy in Yarra’s night time economy.<sup>3</sup> This discussion will inform Council on what safety concerns the community has, and potential strategies to address their concerns.

### 2.2. Contents

The Discussion Paper has been informed by desktop research (literature reviews, analysis of Council and other government/agency data sets), consultation with Council officers and anecdotal feedback from resident and business networks.

**Section Two** outlines the Discussion Paper’s purpose, scope and project’s milestones.

**Section Three** introduces the City of Yarra with some fast facts.

**Section Four** introduces Yarra’s night time economy and why safety can be an issue at night.

**Section Five** discusses five factors that influence night entertainment precincts’ functionality and safety and then considers how other cities keep their night precincts safe, and the opportunities for Yarra City Council and the local community to aim for a safe and vibrant Yarra nightlife.

**Section Six** concludes the Paper.

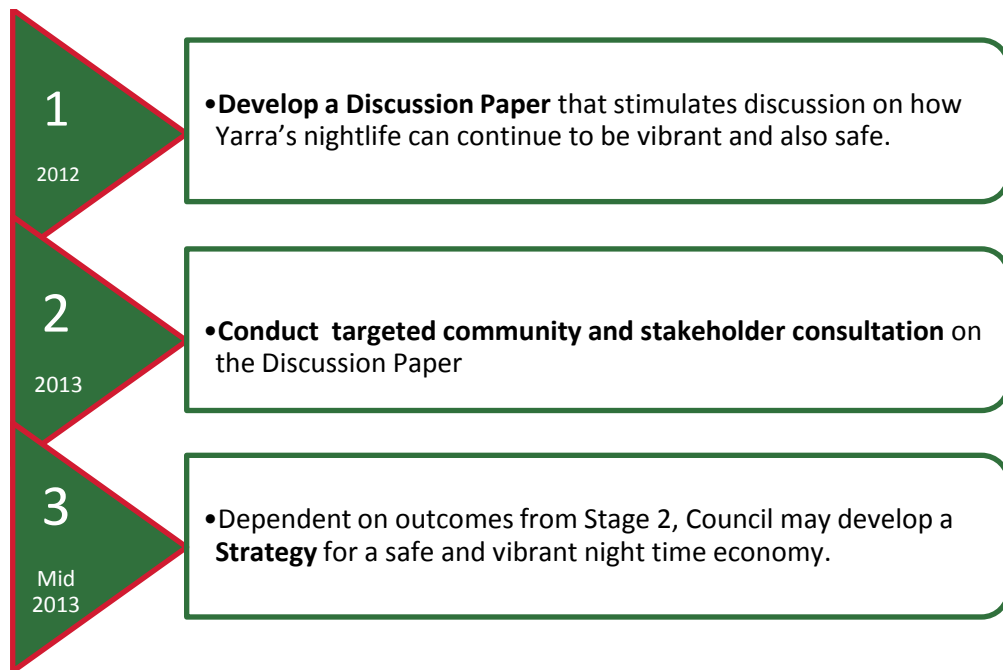
**Section Seven** outlines how to ‘have your say’.

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<sup>3</sup> The term Night Time Economy captures certain social and business activities happening at night. Non-hospitality and non-entertainment related economic activities also take place at night, including cleaning services, education, government services, retailing, baking and other forms of food preparation, and logistics activities.

## 2.3. Project Milestones

Figure 1: Project Milestones





### 3. Yarra Fast Facts

#### People



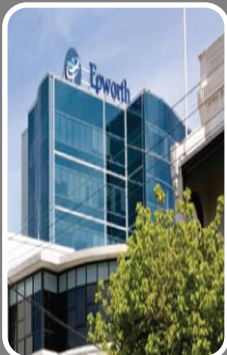
- The estimated residential population was 79,015 living in 33,500 households.
- Just under 40 percent of all residents (28,652 persons) relocated to Yarra from elsewhere between 2006 and 2011.
- The largest age cohort is 25-34. This group makes up 29 percent of the population compared with only 15 percent for Greater Melbourne.
- One-in-four households are couples without children – a proportion that is remaining stable over time.
- Median weekly household income is \$1,680 while Greater Melbourne is \$1,333. Just under one-in-three households earned \$2,500 or more per week.
- Median weekly rent had increased from \$200 in 2001 to \$370 in 2011 (23 percent higher than Greater Melbourne).

#### Place



- At 19.5 square kilometres, Yarra is one of Australia's smallest municipalities.
- Many of Yarra's neighbourhoods are within walking distance of Melbourne's CBD, MCG, AAMI Park, and Rod Laver Arena.
- Yarra has good transport links with an extensive tram network, three rail lines, cycling trails, and connectivity to the Eastern and South Eastern Freeways.
- Nearly one-in-two residents (46 percent) journey to work on sustainable transport: tram, train and bus, cycling or walking.
- Parks and gardens include some of Melbourne's best known open space areas, including Edinburgh Gardens, Darling Gardens, Barkly Gardens, Burnley Park, Linear Park, Mayors Park and many more open space reserves.

#### Economy



- The gross regional product for Yarra is estimated at approximately \$8 billion with 66,792 jobs in the local labour force.
- Yarra's night time economy generates approximately 8% of total jobs in the municipality
- There are 22 night time economy related industries in Yarra,
- Art and Recreation services in Yarra is the 4th highest in metro Melbourne, and Food and Accommodation services is the 3rd highest.



## 4. About Yarra's Night Time Economy (5<sub>pm</sub> to 9<sub>am</sub>)

Business and social activity that goes on at night is an important part of the Australian economy, particularly for tourism, leisure and employment. Victorian night time businesses contributed \$3.4 billion and employed 80,000 people in 2008 (Victorian Auditor General's Office, 2012: 26). Victorian live music in venues alone generates approximately \$500 million and is estimated to increase full-time equivalent employment by approximately 17,200 persons (Deloitte Access Economics, 2011: ii).

Yarra's night time economy provides approximately 8 percent of the total 66,792 jobs in Yarra.<sup>4</sup> Activities considered a benefit to the economy and community include:

- Drink-led activities
- Food-led activities
- Gaming venues
- Retailing (Post 6pm)
- Accommodation
- Performance venues
- Film, theatre, live music opera, etc.
- Cultural institutions
- Sporting and leisure
- Brothels and sex establishments

Source: REMPLAN

The value of these activities to the Yarra economy is estimated in a cost-benefit analysis report that is expected in April 2013.



<sup>4</sup> Appendix 9.1 lists the types of employment that exists in Yarra's night time economy

Much of Yarra's growth is in new apartments in, and around, night entertainment precincts. In a recent survey to new residents, 57 out of 94 responses said they enjoy their neighbourhood because of the restaurants, bars and cafes (Yarra City Council, 2012). Feedback includes:

*"Bars, cafes, nightlife, proximity to city, lots of public transport options, great shopping, interesting people etc."*



*"Vibrant mixture, improving continually, close to rail stations and trams (Victoria St), pubs and restaurants, Abbotsford convent, close to CBD (shops, theatres), easy access to number of cinemas, close to Carlton, Richmond, Northcote etc."*

*"Friendly, feel safe as people are out late at night, inclusive, diverse population, clean, good rubbish collection and good cleaning of streets. Good public transport, good access to restaurants, shopping and entertainment."*

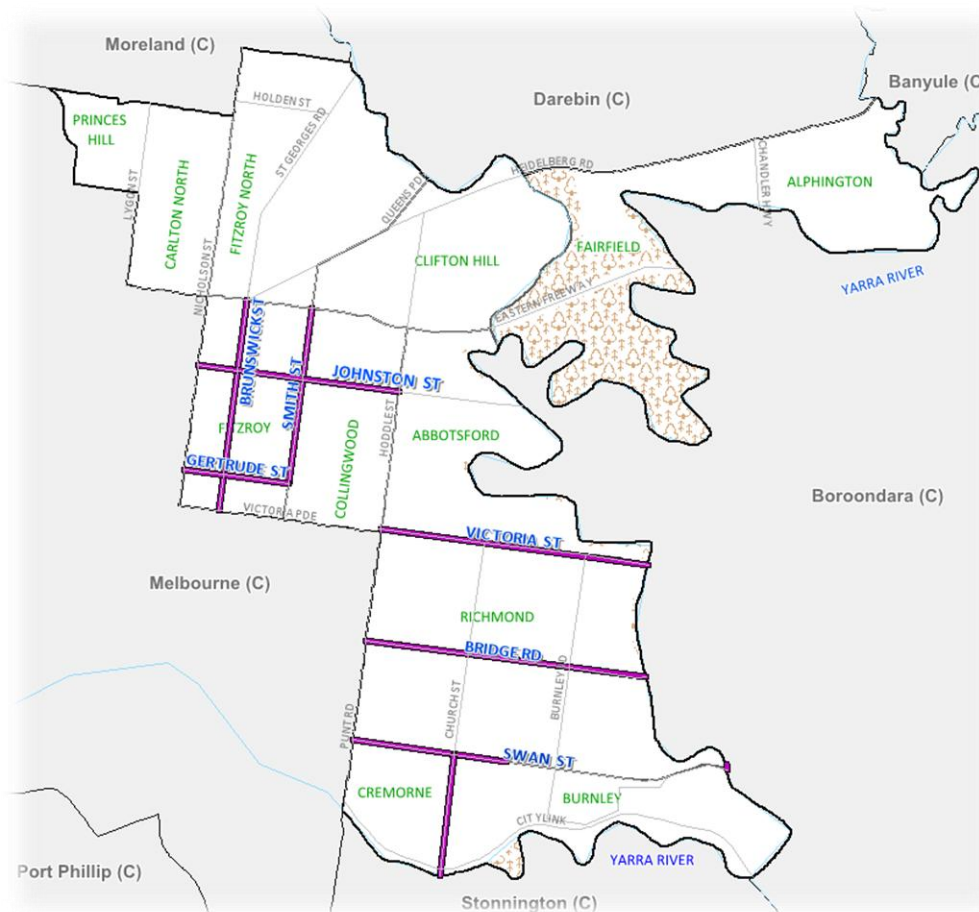
There are also services that are required to support the night time economy, which generate costs for the local economy. These services include:

- Public Services
- Hospitals
- Public Transport
- Policing

A well known cost from night time economic activity is the health and social harms from excessive alcohol consumption. The total cost of providing these services to support Yarra's night time economy will be provided in a cost-benefit analysis report that is expected in April 2013.

## 4.1. Where is the heart of Yarra's nightlife?

Figure 2: Key night entertainment precincts in Yarra



The key night entertainment precincts can be classified as:

- **Swan Street** includes good value eateries, take away food premises and a number of pubs iconic to Melbourne including the Corner Hotel, a popular live music venue. The street is often a destination prior to, and following a sports event at AAMI Stadium or the MCG and for major events held at Rod Laver Arena;
- **Bridge Road** includes endless restaurants of various cuisines, intermingled with several stylish bars and pubs, and like Swan Street, also a destination before or after a sports game or major event;

- **Victoria Street** is the heart of Vietnamese food of high quality and low prices. In addition there are a handful of pubs and non-Vietnamese restaurants;
- **Gertrude Street** has become the centre of sophistication in Yarra and for Melbourne. It hosts a number of cocktail bars, fine dining restaurants like Charcoal Lane and a handful of late night venues in the intimate street;
- **Smith Street** has almost every entertainment option on offer, including nightclubs, numerous restaurants, several intimate bars, live music venues and late night venues;
- **Johnston Street, Fitzroy** is the heart of Melbourne's Spanish precinct, with many tapas bars and the Spanish Club, in addition there are entertainment options such as burlesque and flamenco dancing, and also some late night music and dancing options; and
- **Brunswick Street** offers endless options including cheap and fine dining, the famous Vegie Bar, book shops, live music, late night take away options and several late night venues. In addition, many well-known Yarra pubs are located nearby.

Throughout the week, these entertainment precincts are buzzing and are busier on Friday and Saturday nights. In addition, Queens Parade, Clifton Hill; Rathdowne and Nicholson Streets, North Carlton; St Georges Road, North Fitzroy; Church Street, Richmond; and Johnston Street, Collingwood also have strips of night activities.

## 4.2. Why is safety an issue in Yarra's night time economy?

### **Preserving residents' enjoyment of their neighbourhood**

Yarra's population has increased by 10,000 in just 10 years. Over the next 15 years it is projected that there will be 20,000 additional residents. The majority of the actual and projected growth is in and around the night entertainment precincts. At the same time, trends in visitor numbers are mirroring that of residential growth.

More people are occupying the same amount of public space, placing pressure on urban amenity. Concurrently, community expectations are heightened, with residents, businesses and visitors expecting clean public spaces, quality public facilities and well-behaved visitors.

Perceptions of safety tend to be lower when public spaces are not well looked after (Metropolis Research, 2012: 50). Council will need to ensure those public spaces used at night are functional for two purposes: residential living and entertainment.

### **Public drunkenness and alcohol-related assault or injury**

Among sections of the Australian community, there is a culture that normalises heavy drinking when socialising. When socialising amidst a buzz of street activity, some people, often alcohol intoxicated, can behave in an anti-social manner resulting in assault or injury (Miller, et.al, 2012: 2). Such behaviour not only increases risk to the individual, but can cause harm to others or make others feel unsafe. This reduces the attractiveness of the night entertainment precinct for everyone.

### **Limited public services and amenities at night**

At night, services change. Most public transport options stop by 1am placing greater demand on taxi services. Many public toilets in Yarra close at sunset. As an inner city locality, access to such services is expected.

## 5. To what extent are Yarra's night entertainment precincts safe and functional?

### 5.1. Introduction

This section discusses five factors that influence the safety and functionality of night time activities, these are:

- safer people and vehicle movement;
- the appearance of public places used at night and how this impacts on perceptions of safety;
- the diversity of night activities on offer;
- clear standards of acceptable environmental noise levels; and
- presence of anti-social behaviour and perception that it is generally associated with night activities.

Each factor is discussed through the following structure:

- Context – the current situation and known challenges;
- Evidence and experiences elsewhere – other cities responses to the identified challenges; and
- Opportunities – potential options to consider addressing the identified challenges.



*Questions on each factor are posed to the reader* and can be addressed in submissions to Council.

Please note that some of the factors/issues are generally relevant for only some precincts in Yarra.



## 5.2. Safer people and vehicle movement

### 5.2.1. Context

Footpaths are vital for people to move along the main streets safely. Also, the more people walking or dining outdoors, the greater is the passive surveillance, which contributes to improving actual and perceived safety and the night precinct's vibrancy.

Footpaths in Yarra's night activity streets vary in capacity to accommodate foot traffic, wheelchairs, bike racks, outdoor dining and street furniture. Congestion does occur when people queue outside a venue, bikes are parked on the footpath and there are pedestrians.

Other than pedestrians on footpaths, cars frequently pass through Yarra's night precincts. Events from the nearby MCG, Rod Laver Arena and AAMI Park significantly increase the volume of cars (and people) passing through Swan Street and Bridge Road. Both streets have a 40km/per hour speed limit to minimise potential pedestrian and vehicle collisions.



*Which specific locations in Yarra's main streets have you had difficulty passing through?*

### 5.2.2. Evidence & experiences elsewhere

Overcrowding of footpaths is a challenge for many cities at night (and day). Evidence indicates that responses such as traffic calming measures, temporary road closures and footpath management enhance the safety of pedestrians (Hadfield, 2011: 178). For example, in the City of Melbourne, footpaths are wide in high pedestrian zones such as Swanston Street and roads are temporarily closed with bollards to accommodate heavy foot traffic after sports events at the MCG or Etihad Stadium.

### 5.2.3. Opportunities

Opportunities to improve safer people and vehicle movement include:

- exploring ways to accommodate large volumes of people in public spaces particularly around congestion hotspots, through public squares/piazza;
- exploring traffic calming measures (e.g. road bollards) to manage car and foot traffic before or after major events; and
- investigating current use of bike racks to assess if more bike parks are needed, and consider if the footpath is the best location for racks.

## 5.3. People getting home safely

### 5.3.1. Context

For those visitors without private transport (vehicle, bicycle or foot), getting home depends on a taxi service, with the last public transport services terminating at around 1am on Friday and Saturday nights.<sup>5</sup> Data shows that taxis are most heavily used by those who live closer to the CBD (Taxi Industry Inquiry, 2012: 60, 72).

A lack of transport can contribute to drink-driving, the injury of intoxicated pedestrians and increased violence when people are on the streets long after they wish to be there, waiting for a taxi or when walking home (VicHealth, 2012: 18).

In Yarra, there are approximately 90 businesses that operate beyond 1am. These are mainly located in Brunswick, Johnston, Smith, Gertrude and Swan Streets. Traders report that late night patrons struggle to find an available taxi. The recent taxi inquiry similarly found that a service shortage exists on Saturday and Sunday morning, between midnight and 2am. This leads to frustration and the potential for anti-social behaviour because of competition for scarce transport resources in a context where the majority of customers are likely to be intoxicated (Hadfield, 2011: 46). However, despite this finding, wait times for ready to ride passengers who make a booking through a network are not substantially higher at this time (Taxi Industry Inquiry, 2012: 80).

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<sup>5</sup> Later at night, Sunday to Thursday, the last public transport available is at midnight and on Friday and Saturday until 1:30am for trams, 1am for trains and 12:30am for buses. There are also nightrider bus services that operate on the outskirts of Yarra, destined away from the city.

In 2007/08, two safe taxi ranks were trialled in Yarra, one in Swan Street and the other in Brunswick Street. Both ranks were positioned close to popular late night venues. The trial found that these ranks were unsuccessful in getting more people home. Key reasons included: limited space for the rank space, limited use by patrons particularly in Brunswick Street as venues are spread out, taxi drivers did not use rank, and lack of publicising of the rank to traders and patrons (Monash University Accident and Research Centre, 2009: 6).



*Do you use public transport or taxis late at night? If so, have you experienced difficulties in accessing either service from night entertainment precincts?*

### 5.3.2. Evidence & experiences elsewhere

Research shows that safe late-night transport can notably contribute to preventing violence and injury, as well as helping to make city centres more welcoming (Hadfield, 2011: 31).

In Manchester, UK, local Council and police decided to introduce late-night buses in 2001. This additional service was successful in becoming commercially viable with services every 20 to 30 minutes until 3:30am on Saturdays and Sundays. Similarly, in Amsterdam a late night bus service was introduced, funded by late night traders (Hadfield, 2011:173-4). Some cities like New York and London offer 24 hour subways/buses which offer late night patrons a way to get home (Matthews, 2009:12).

While to address scarce taxi services late at night, in the City of Melbourne several safe taxi ranks were introduced to improve opportunities to get people home safe. A case study below details City of Melbourne's safe taxi rank program. Notably, these ranks are

supervised by a security officer to guide queuing for taxis to minimise potential conflict. Also in the city there is a share taxi service operating from the ranks as a way to move large numbers of people out of the CBD quickly and safely. Melbourne City Council also has a late night transport options map which details transport options and provides tips for travelling safely late at night.

### 5.3.3. Opportunities

Opportunities to address limited late night public transport options may include:

- Council with late night venue operators and the Department of Transport developing a mutual understanding of when and where additional transport is required;
- Council to plan with sports/entertainment precinct and City of Melbourne how to reduce the impact of high volumes of cars and people before and after major events;
- undertaking a survey of where late night patrons live, how they travel to venues and intend to travel home;
- engaging with late night venue operators about opportunities to get their patrons home safely (e.g. pre-ordering taxis; including share schemes, offering private buses);
- producing community information on late night transport options; and
- promoting sustainable travel (e.g. walking, cycling as alternative late night travel modes).

## ***Case Study: City of Melbourne Safe taxi rank schemes***

### **Project Information (see Appendix 9.2 for further information about safe taxi ranks)**

**Commenced and operates:** The Safe City Taxi Ranks (SCTR) have been operating since 2003. Swanston St rank operates 24 hours, 7 days and the other ranks, 11pm – 5am Friday and Saturday nights and for special events.

**Locations:** Flinders Street Station (Swanston Street), 20 Bourke Street, 8 King Street, 200 Queen Street mega rank.

**Cost:** The annual costs associated with operating and maintaining the SCTR (four ranks and security personnel costs) as of 2007 were \$438,000.

### **Reason for Project**

The Safe City taxi rank scheme aims to address concerns about getting home safely late at night, provide a safe environment, reduce and detect crime and assist in the apprehension of offenders.

### **Project Description**

The SCTR are located in improved popular pedestrian routes with lighting and signage and Safe City security cameras. Each rank consists of a varying number of kerb side parking bays and is staffed by a security officer in a distinct uniform. The ranks are linked to the Safe City Cameras Program which aims to provide a safe environment, reduce and detect crime and assist in the apprehension of offenders. Each rank has a totem-style sign with an emergency duress button and pinhole camera installed. When the duress button is pressed it automatically rotates the nearest Safe City camera to provide vision of the area of the taxi rank.

### **Fast Facts**

More than 54,000 used the SCTR service in 2006. A Survey of patrons identified that of the majority, male or female, were using the SCTR more than once a week to weekly.

### **Evaluation**

A review was conducted in 2007. Moutia & Rowe (2007) recommended:

- improving public knowledge of SCTR by promotion, targeting patrons (e.g. at clubs, pubs etc) and ensuring that signage displayed on the SCTR totems is present and relevant;
- relocating some ranks;
- modifying of the hours of operation from the current midnight til 6am to 11pm til 5am; and
- introducing a distinctive full uniform for SCTR security officers.

The recommendations also suggested that designs of Taxi Ranks incorporate these principles:

- shelter for both security officers and patrons;
- queuing and crowd control systems; and
- Victoria Police patrol support for operating ranks.



## 5.4. Enhance safety and appearance of public spaces used at night

### 5.4.1. Context

Public toilets, litter bins and lighting improve local amenity, perceptions of safety and support social activities.

Council regularly receives complaints that individuals urinate in public around later trading venues. Along major streets with night activities, public toilets are open in:

- Brunswick Street (corner of Victoria St);
- Smith Street (corners of Otter Street; Keele Street and Peel Street);
- Swan Street (Richmond Train Station till the last train); and
- Victoria Street (corner of Lithgow Street).

Litter such as takeaway food wrappers, alcoholic and non-alcoholic beverage containers can accumulate on Friday and Saturday nights. When excess litter is evident in nearby residential streets, this affects residents' perceptions of safety and reduces their sense of pride of the local neighbourhood.

On busy nights in entertainment precincts, street cleaning services operate throughout the night. Main streets are cleaned several times throughout the night and more services are put on for major events, such as the Johnston Street Fiesta and New Year's Eve.



*What existing night entertainment precincts in Yarra or potential spaces are underutilised at night because of their perceived unsafe or unclean appearance?*



Street lighting improves visibility and safety in Yarra's entertainment precincts, residential streets and parks (when used by a sports club). Council is required to provide lighting across the municipality. Not every piece of footpath is possible to light up as private property should not be exposed. Occasionally Council receives request to install more lighting in activity precincts. One such location is Richmond Train Station's underpass on Swan Street with complaints that is unsafe because of the lack of lighting.



*What public amenities do you need when visiting night entertainment precincts?*

#### 5.4.2. Evidence and experiences elsewhere

The presence of well designed and managed public spaces attracts businesses and these in turn attract visitors, employees and services.

Public toilets are an important part of any functional entertainment precinct. Several cities such as London and Amsterdam, and recently Sydney, use temporary urinals on busy nights to preserve the local amenity. Also some cities in the UK have supervised 24 hour public toilets (Hadfield, 2011:165). Sydney City Council has also committed to enabling public toilets to operate 24/7 and improve their signage because of demand for their use (Sydney City Council, 2011: 30).

Street cleaning services similarly are crucial to a functional night entertainment precinct. Various methods are used elsewhere to maintain clean public places, including: underground vacuum removal of waste because of footpath congestion, larger bins and additional services funded by late night businesses (Sydney City Council, 2011:29). Below is a case study on how the City of Westminster maintains clean streets on busy nights.

Research shows that street lighting enhances perceptions of safety and prevents crime in and around busy entertainment precincts because it encourages foot traffic. (Hadfield, 2011:163) For example in the City of Melbourne, parks are lit to encourage pedestrian use so parks are part of Melbourne’s night character.

### 5.4.3. Opportunities

Opportunities to improve perceptions of safety and local amenity may include:

- identifying gaps in public amenities based on observations of night time behaviours e.g. litter audit;
- working with late night businesses whose operations may be contributing to the litter to collaboratively clean up the area; and
- identifying any potential public spaces underutilised for night activity e.g. parks, pedestrian routes, because of a current lack of public infrastructure.



*What makes a night time precinct appear safe to you?*

## ***Case Study: Night time waste collection and cleansing service provided by Onyx UK Ltd***

### **Project Information**

<b>Commenced and operates:</b>	Since September 2003, 7 nights a week 10pm to 6am
<b>Location:</b>	City of Westminster, London, UK
<b>Cost:</b>	32 million pounds annually (AUD \$47 million)

### **Reason for Project**

Between 6pm and 6am, there is an increase in night time local environmental problems, such as litter, club flyers, street urination and other forms of anti-social behaviour. The worst of the litter can be found around congregation areas such as bus stops, club entrances, fast food shops, etc. People lose their inhibitions and act in a manner unfamiliar to them when they are sober.

### **Project Description**

The night-time waste collection and cleansing service uses mechanical sweepers and flushing vehicles across 204 streets every night. Generally a minimum of three hours (between 03.00 and 06.00) is required to clean streets for the start of the next working day. The City Council has a dedicated Night Operations Manager with a team of Street Enforcement staff to liaise with Onyx to resolve issues as they arise.

The service is structured differently to that of the day shift. Due to the changing nature of the problems and the issues that the city presents to the service, the night shift must be very flexible. In some locations streets are so busy that the contractor is unable to obtain access until the crowds disperse. At these times it is accepted that the most that can be achieved is litter picking to contain levels within reasonable bounds before comprehensive cleaning becomes possible. This encourages people to observe normal standards of care by placing litter in bins whilst also assisting the early morning cleansing process.

### **Fast Facts**

- An estimated 110 tons of waste is removed from a total of 204 streets every night.
- Cleansing team is made up of 21 night-time road sweepers.

## 5.5. Increase diverse night activities in Yarra

### 5.5.1. Context

In Yarra's night precincts, dining, drinking, listening to live music and other performances are the main activities on offer. Later at night (e.g. after midnight), having a drink or a snack are often the remaining options. This tends to be the case around Smith, Brunswick, Johnston (Fitzroy) and Swan Streets.

On occasion Council receives feedback that the precincts are mono-cultural by night and that people want more alternative night activities. Currently gyms, libraries, retail, neighbourhood house programs and youth facilities are only available till 6pm or 9pm. Without these additional services, the social and economic benefits from the night time economy are narrowed and consequently, so too are the types of people in the precincts. A mono-cultural late night economy can also result in lower perceptions of safety and amenity.



*What activities, services or open spaces do you want currently use in Yarra at night? Are there others you would want available at night?*

### 5.5.2. Evidence and experiences elsewhere

The evidence indicates that successful night-time cities offer an interesting choice of leisure and entertainment for a diversity of ages, lifestyles and cultures (Sydney City Council, 2011:20). Providing more diverse attractions and routine activities (visiting a supermarket or gym) in the evening attracts a broader population into the area which promotes social cohesion, vibrancy and deters crime (Hadfield, 2011:19).

Many cities in Asia, North America and Europe have well-established late shopping precincts. Such extended shopping creates a viable transition from daytime to evening economies and also encourages office workers to stay in the area later. It is also common across European cities to have cultural institutions open in the evening.

Within Melbourne, when cultural night-based events are on offer Melbournians flock to them. The City of Melbourne thrives during International Comedy Festival, Moomba, Melbourne International Film Festival, Arts Festival and other night events. Similarly the City of Port Phillip buzzes during the St Kilda Music Festival, Film Festival, and regular events, such as the South Melbourne Night Market.

More recently, White Night Melbourne is a new event with an arts-focus to encourage Melbournians to spend a whole night out in the city. The event includes opening iconic cultural centres (the Arts Centre and the National Gallery of Victoria) from 7pm to 7am, plus a raft of free events and performances around the CBD.

### 5.5.3. Opportunities

Opportunities to increase diverse night activities in Yarra include:

- Council, traders and community promoting the diverse activities already in Yarra, and explore the potential for more, such as pop-up and activity-oriented public spaces;
- assisting community groups and businesses to navigate administration processes required to establish or extend ventures at night; and
- gathering further evidence on what night activities appeal to a broader cross section of the community.



*How could businesses and community encourage diverse activities at night?*



## 5.6. Clearer expectations on acceptable noise levels

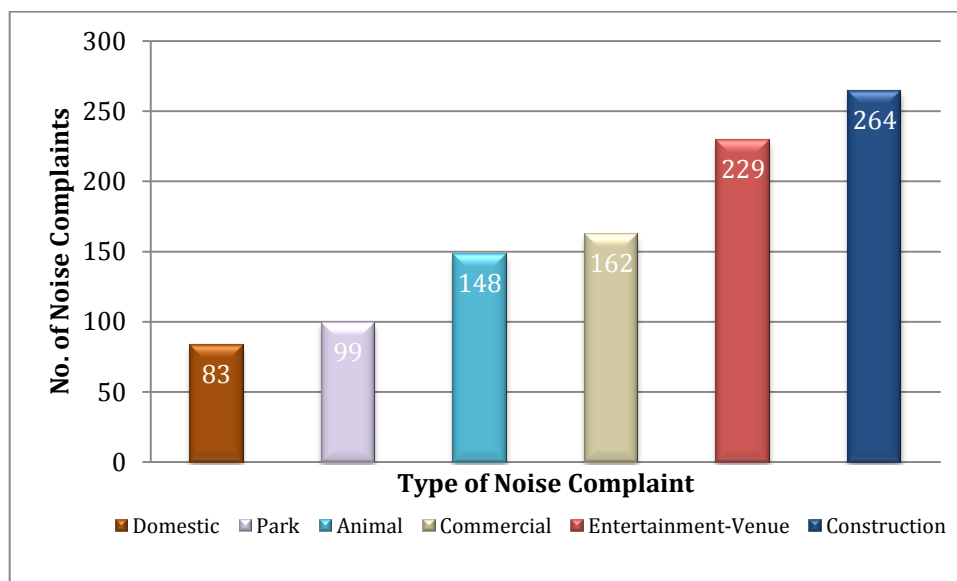
### 5.6.1. Context

Noise is constant from day to night in Yarra because of its inner city locality, nearby arterial roads, public transport, shopping strips and dense population. Noise from night entertainment precincts which is largely from venues, foot and vehicle traffic, outdoor dining and music, can in some cases lower perceptions of safety for nearby residents.

Noise is regulated in Victoria to support residents and traders to live in close proximity, as in Yarra.<sup>6</sup> However, despite these regulations, noise both during day and night does impact some residents' sense of safety and amenity.

In both 2011 and 2012, Council received approximately 200 noise complaints related to night time economy activity (entertainment venues). Figure 3 below shows the main types of noise complaints that Council received in 2012.

**Figure 3: Noise complaints reported to Yarra City Council in 2012**



<sup>6</sup> Noise regulation includes the State Environmental Protection Policies (SEPP) No. 1—control of noise from commerce, industry and trade; No. 2—control of music noise from public premises and the Live Music Practice Guide.



Of those venue-related noise complaints, just short of half were reported as an issue after 11pm, and more than half reported were about noise on a weekend. While noise from night time activity is not residents' major noise disturbance, it's likely to grow. As previously stated, Yarra is projected to have 20,000 new residents in the next 15 years and many of these new residents will be located in or near the entertainment precincts.

To preserve and encourage positive night activity such as live music, Council's Live Music Working Group has created fact sheets for businesses, which clarifies their right to operate within the conditions set on their planning permit. This is to help deal with common misunderstandings that Council does not approve of night activity and/or live music.

***Are noise levels impacting on you at night? If so, what type of noise is it?  
How can 'night' activities in Yarra operate while nearby residents get a good night's sleep?***

#### **5.6.2. Evidence & experiences elsewhere**

Yarra is similar to other vibrant night entertainment precincts where residents live close to commercial premises, which can create a tension around acceptable levels of noise and amenity. Research done in New York found that night noise levels while potentially disruptive for residents was not anti-social as commonly perceived (Hadfield, 2011:150).

Experiences elsewhere to enhance amenity for residents close to night entertainment precincts include "noise maps" of late night areas, such as in Scotland. This then sets clear expectations for residents (Matthews, 2009:27). Similarly in the Fortitude Valley in Brisbane, a special entertainment precinct was created around an existing cluster of night venues. This sets clear expectations of noise levels and amenity for the area.

Other approaches used elsewhere include double glazing and thicker exterior walls for residential development in areas with later trading (Sydney City Council, 2011:37).

### 5.6.3. Opportunities

To enhance liveability and perceptions of safety for residents later at night and to support live music and other legitimate noise-generating night activities, opportunities include:

- late night traders and residents learning more about each other's expectations;
- briefing new residents about what type of environmental noise to expect;
- exploring alternative options to resolve common causes of noise complaints;
- reviewing Council's approach to recording and resolving noise complaints to determine if a more efficient process is possible; and
- conducting a literature review of building requirements for soundproofing in urban areas to understand how residents in night entertainment precincts can live comfortably.

## 5.7. Minimise anti-social behaviours and negative perceptions associated with night activities

### 5.7.1. Context

After 11pm, there are approximately 290 businesses open, and after 1am there are approximately 90 open on a Friday and Saturday night in Yarra. Many of these are licensed bars, pubs, several nightclubs and snack food outlets concentrated mainly along Brunswick, Swan and Smith Streets.

There is inevitably potential for anti-social behaviour around these night businesses because of patrons' tendency to drink alcohol excessively, particularly on Friday/Saturday nights. Research, experience and anecdotes from licensed premises' managers indicates that excessive alcohol consumption can lead to aggressive behaviour in some individuals.

Available data shows that some level of anti-social behaviour exists in Yarra, as indicated by:

- Yarra having the third highest ambulance alcohol-related attendances in the Melbourne metro in 2009/10. The peak time for these alcohol-related attendances was between 10pm and 2am and on Friday and Saturday nights (Lloyd, 2011:27);
- Victoria Police data showing that nearly two-thirds of assaults in Victoria between 8pm Friday to 6am Saturday and 8pm Saturday to 6am Sunday were alcohol-related (Victorian Auditor General's Office, 2012:45); and
- 17 percent of respondents to a Council survey reported feeling unsafe because of alcohol-related anti-social behaviour, and drugs (Yarra City Council, 2012: 50).



*Is anti-social behaviour evident when out in Yarra at night? If so, where, what and why did it happen?*

### 5.7.2. Evidence and experiences elsewhere

To reduce anti-social behaviour in late night entertainment precincts, contested evidence exists. On one hand, widespread research points to reducing the concentration of late night licensed venues. Later closing times and clusters of licensed venues (and takeaway food premises) are linked with higher levels of alcohol-related violence and alcohol-related hospital admissions. Densities create more interactions between different groups of drinkers and this increases the chance of alcohol-related aggression (Hadfield, 2011:60). Outlet density policies exist in the City of Westminster, London and City of Stonnington.

However, other research supports that concentrated late night precincts are safer. Reasons include when many people are present, there is passive surveillance and higher perceptions of safety. There are also better public services and infrastructure (police presence, public transport, taxis, cleanliness) available in concentrated entertainment precincts.

Experiences elsewhere show that liquor licensing interventions, such as outlet density, lockouts, accords, CCTV and ID scanners, alone do not improve safety in late night areas (Hadfield, 2011:11); (Miller et.al, 2012:294, 306). In order to make night precincts safer, a multi-pronged approach is needed. This includes ensuring licensed venues are well-run, providing toilets and good lighting in popular night precincts, offering diverse night activities, attracting visitors of various ages and having late night public transport options. These all collectively improve the safety of the local area (Hadfield, 2011:24). For example, see overleaf for two case studies on strategies to deal with anti-social behaviour, and their outcomes.

### 5.7.3. Opportunities

Opportunities to minimise potential for anti-social behaviour may include:

- analysing incidents of anti-social behaviour taking place, where and why, using local Police data. This will allow Council, traders and State Government to effectively respond;
- reviewing the impact of liquor licensing regulations on safety locally;
- reviewing Council's approach to liquor license assessments; and
- identifying gaps in the public services/infrastructure necessary for night precincts (street cleaning, public transport and expectations on acceptable noise levels and behaviour).

## ***Case Study: The Norwich SOS Bus Project run by Open Youth Trust***

### **Project Information**

<b>Commenced and operates:</b>	Since 2002, Friday and Saturday nights, 9pm to 3am
<b>Location:</b>	Norwich, UK
<b>Cost:</b>	Unknown

### **Reason for Project**

A number of tragic events happening in the local night entertainment precinct led to a Nightclub Liaison Committee introducing practical initiatives (e.g. a radio system link between all the clubs and police) and on-site medical and social services to make the local area safer.

### **Project Description**

The scheme provides a safe haven for people to attend at times of need or for any other reason. It offers first aid, advice and other types of help. The scheme uses two vehicles, one for counselling and practical support and another parked nearby which is operated as a 'medical unit' The scheme also has a 'support vehicle' which is used to collect clients who are injured or in distress and bring them to the 'safe haven'.

### **Fast Facts**

- On average seven workers man the SOS Bus.
- The main causes of the injuries presented by clients during this period were assaults and accidental trips/falls.
- From April 2001 to November 2008 the Original SOS Bus helped 5050 people.
- Since November 2008 the new SOS Bus has helped 1869 people and the Medical Unit has given aid to 717 people.
- Between 22 November 2008 and 1 April 2011, an estimated 409 hospital Accident and Emergency Department admissions were saved by the scheme.

## ***Case Study: Identification (ID) scanners in licensed venues***

**Project Information** (see Appendix 9.3 for further information about ID scanners)

<b>Commenced and operates:</b>	November 2007
<b>Location:</b>	Geelong, Victoria
<b>Cost:</b>	Unknown

### **Reason for Project**

The implementation of ID scanners occurred within the context of increasing public concern about alcohol-related violence and no evidence-based community level interventions (Miller et al 2012).

### **Project Description**

After a short pilot, the use of ID scanners in Geelong were formalised in 2007 under a voluntary Liquor Accord developed between venue licensees, police and the City of Greater Geelong. Seven 'high risk' venues (those trading beyond 1 am) installed ID scanners which are programmed to recognise 154 different types of ID from around the world and can also identify fake or altered IDs. The scanners can also record the identities of patrons entering the venues (VicHealth 2012).

Miller, Diment & Zinkiewicz (2012) claim the most commonly applied model is where the scanner records the IDs of patrons entering a venue and compiles the information in a database that can then be linked to other venues and police using ID scanners. If a patron uses a fake ID, or is thrown out of a venue for causing trouble, a note can be made against their name in the common database, preventing later access to other venues linked into the system.

### **Fast Facts**

- Geelong has a concentration of licensed venues in its centre with venues closing at 1, 3, 5 and 7 am.
- Almost 90 percent of Geelong residents were concerned about alcohol-related crime in their main entertainment precincts and have low perceptions of safety in such areas

### **Evaluation**

The Dealing with Alcohol-related harm and the Night-Time Economy (DANTE) study evaluated this project. Miller et al (2012) reported that despite licensees reporting some concerns among patrons over the use of ID scanners, this was offset by a broader perception that scanners had resulted in an improvement in patron behaviour and reduced levels of violence in venues using scanners.

Despite the perceived benefits to using ID scanners in licensed venues, Miller et al (2012) found that no obvious reductions in injury appeared to be associated with using them. Indeed, the implementation of ID scanners was associated with increases in emergency department injury attendances during high alcohol use hours. In addition to this, ensuing analyses of Police assault records suggested a move from incidents of interpersonal violence inside venues to incidents outside venues.



## 6. Conclusion

This Discussion Paper discussed the opportunities for Yarra's nightlife to be safe, vibrant and functional. The Paper focused on what influences the safety and amenity of night entertainment precincts, specifically: the ease of movement of people and vehicles, the ability to get home safely, the appearance of public spaces, the diversity of activities in the area, acceptable environmental noise levels and levels of anti-social behaviour. The Paper discussed how other cities make their night entertainment precincts safe, vibrant and functional and proposes some opportunities for Council and community to consider.

Throughout Section Five questions were posed to readers on their views in response to the issues raised. Readers are encouraged to address the questions in submissions to Council.

Evidence presented in this Paper indicates that providing diverse night time activities and well-integrated public services, infrastructure and managing expectations is most successful at supporting safe and functional night entertainment precincts to be both a space for entertainment and enjoyable for nearby residents.

## 7. Have your Say

Tell us what you think. How? Answer those questions in Section Five that are relevant to you. In addition tell us about:



*What is the main reason for your visit to a night time precinct in Yarra? E.g. Recreation e.g. exercise, or food or drink or shopping*

*What do you like about the specific night entertainment precinct that you visit?*

*Is there anything you don't like about the specific night precinct you visit? e.g. choice of entertainment, the look and feel of the space.*

*Do you have any ideas on what could address what you don't like about the specific night entertainment precinct you visit?*



Submit your say by 31 May 2013 via:

1. Written submission by email: [susan.gulko@yarracity.vic.gov.au](mailto:susan.gulko@yarracity.vic.gov.au)
2. Want to talk? Call Susan Gulko on 03 9205 5156
3. Visit our online discussion forum: <http://yarraconsultation.com.au/safe-yarra-at-night>

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## 9. Appendices

### 9.1. Table 1. Total employment of Yarra Night Time Economy – related Industries

Industry	Main night activity centres	Elsewhere in LGA	Total LGA
Food Retailing, nfd	61	5	66
Supermarket and Grocery Stores	481	138	619
Liquor Retailing	76	58	134
Other Specialised Food Retailing	88	39	127
Accommodation	174	113	287
Food and Beverage Services, nfd	51	14	65
Cafes and Restaurants	1389	248	1637
Takeaway Food Services	685	236	921
Catering Services	133	200	333
Pubs, Taverns and Bars	530	151	681
Clubs (Hospitality)	17	16	33
Performing Arts Operation	36	14	50
Creative Artists, Musicians, Writers and Performers	306	138	444
Performing Arts Venue Operation	7	0	7
Health and Fitness Centres and Gymnasias Operation	66	125	191
Sports and Physical Recreation Clubs and Sports Professionals	11	5	16
Sports and Physical Recreation Venues, Grounds and Facilities Operation	16	10	26
Sports and Physical Recreation Administrative Service	6	5	11
Amusement and Other Recreational Activities, nec	22	20	42
Lottery Operation	9	0	9
Other Gambling Activities	14	0	14
Brothel Keeping and Prostitution Services	5	10	15

Source: REMPLAN 2013

## 9.2. Background Paper: Safe Taxi Rank Schemes in Victoria

VicHealth (2012) claims that lack of transport can contribute to drink-driving, the injury of intoxicated pedestrians and increased violence through people being on the streets long after they wish to be there, either at taxi ranks or when people are walking home. Within the night-time economy, Morgan and McAtamney (2009) suggest that poor management of cluster points such as taxi ranks are risk factors for alcohol related violence.

In addition to this, the recent Taxi Industry Inquiry (2012) concludes that a service shortage exists on Saturday and Sunday morning, between midnight and 2am. This leads to frustration and potential for anti-social behaviour because of competition for scarce transport resources in a context where the majority of customers are likely to be intoxicated (Taxi Industry Inquiry 2012; Hadfield 2011).

For those visitors without private transport such as a car or bicycle, or who are unable to walk home, once public transport terminates for the evening (around 1am on Friday and Saturday nights) getting home depends on a taxi service. The Taxi Industry Enquiry (2012) shows that taxi customers are concerned with their safety late at night while waiting for cabs at city taxi ranks, and when unable to get a cab and public transport has ceased.

Safe taxi rank schemes are one initiative which aim to provide patrons with a safe course of transport home late at night. The ranks are supervised by security personnel and generally operate overnight on weekends and special events. Safe taxi ranks exist in a number of municipalities throughout Victoria, including Melbourne, Greater Geelong, Ballarat, Greater Bendigo, Port Phillip, and Yarra, with reviews having been conducted on all these ranks.

### Evaluation

A review of the City of Melbourne Safe City Taxi Ranks was conducted in 2007. The key design principles that came out of Moutia & Rowe's (2007) review aligned with the broader recommendations arising from an evaluation of the Safe Taxi Rank trial in the cities of Ballarat, Greater Bendigo, Port Phillip and Yarra in 2007-08.

Each rank had its strengths and weaknesses, and from these a list of general recommendations for establishing and operating safe taxi ranks were developed. Overall, MUARC (2009) concluded that a state wide safe taxi rank plan including standardised rank design, facilities and management should be developed. Considerations included:

Location:

- In close proximity to key high volume late night entertainment venues.
- Easily and safely accessible.
- Features dedicated road space in a marked, legally controlled zone with enough length to accommodate a queue of at least eight taxis.



Design and facilities:

- Adequate space and pedestrian barriers to allow patrons to queue in an orderly fashion.
- Shelter for patrons and security staff.
- Availability of public toilets and rubbish bins.

Information & signage:

- Signage detailing purpose, hours and days of operation, existence of security staff/CCTV/police patrols.

Security:

- Well lit ranks.
- An adequate number of security personnel should provide a service that includes both crowd control and taxi management services.
- Staff should wear an easily identifiable uniform.
- Security staff should be in direct radio contact with neighbouring venues.
- The rank should be incorporated into regular police patrols.

**Case Study: City of Greater Geelong Safe City Taxi Rank**

The City of Greater Geelong currently operates one rank in central Geelong between 1am and 6am on Saturday and Sunday mornings. The rank has 2 security officers and there are currently plans to introduce an ID scanner in an attempt to reduce assaults on taxi drivers, and passengers leaving the cab without paying.

The DANTE study (2012) involved evaluating existing strategies (including safe taxi ranks) to address alcohol-related harm in the entertainment precincts of two regional Australian cities, one being Geelong, Victoria.

Miller et al (2012) found mixed results for the implementation of the safe taxi rank, with data from the Geelong emergency department and local police finding that the rank had no significant effect. Further, many key informants reported that while safe taxi ranks were now considered basic good practice, the reality was that there were far too few taxis in the city to service it.

That said, while not influencing the overall rates of assault or emergency department injury presentations, Miller et al (2012) declare that safe taxi ranks are a measure that local communities can implement to manage transport difficulties caused by lack of taxis under the current system.

Research shows that improving transport options in entertainment districts reduces alcohol-related harm (Homel et al 2004 cited in Miller et al 2012; Hadfield 2011); however transporting people in and out of entertainment precincts continues to be a huge challenge for stakeholders (Homel et al 2004 cited in Miller et al 2012).

Miller et al's (2012) finding that the Geelong Safe City Taxi rank had no significant effect is supported by Babor et al (2010), who revealed that evaluations of two longstanding well functioning US based ride service programs, including one providing free taxi rides home over the festive season, found no discernable impact on annual crash rates, although the programs were well established and popular.

Reviews of safe taxi rank schemes in various municipalities have provided recommendations for future design and management of safe taxi ranks. Even though transport initiatives such as safe taxi ranks address some elements of the problematic issue of transport availability in the night time economy, there have been no evaluations of such interventions. More research is required into the effectiveness of such strategies before any conclusions can be drawn about their positive contribution to the night time economy (Miller, Diment & Zinkiewicz 2012).

VicHealth (2012) proposes that a program of research be conducted around taxi and public transport systems for night-time entertainment districts, emphasising the need for different solutions in larger cities and regional areas, both in terms of transport costs and cultures relating to public transport.

With the lack of taxi availability in Victoria, providing safe taxi ranks is a practical measure which helps reduce alcohol-related harm. Safe taxi ranks, although not influencing the overall rates of assault or emergency department injury presentations, are a measure that local communities can implement to manage transport difficulties caused by lack of taxis under the current system (Miller et al 2012).

Miller et al (2012) state that safe taxi ranks are essentially a sensible harm management tool which are logical from a wide range of perspectives, most of which are not necessarily open to measurement.

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### 9.3. Background Paper: Identification (ID) Scanners in Licensed Venues

Alcohol is a major cause of health and social harms in Australia. The estimated cost of alcohol to the community is \$15.3 billion including crime, violence, treatment costs, loss of productivity and premature deaths in 2004–05 (Collins & Lapsley 2008). Miller et al (2012) claim that in particular, problems associated with the night-time economies of urban and regional centres cause substantial community concern and constitute a significant drain on police, community and health resources. Local governments play an important role in preventing the harm caused by alcohol in their communities (Streker 2012).

The use of identification (ID) scanners to try and curtail the problems of alcohol-related violence and antisocial behaviour in and around licensed venues is somewhat new and untested (Miller, Diment & Zinkiewicz 2012). The World Health Organisation (WHO) (2012) claims that interventions such as ID scanners are rare in most European countries, although Palmer, Warren & Miller (2012) note that ID scanning has proliferated with in many urban night-time economies within Australia, the United States, Canada and the United Kingdom.

The use of ID scanners replaces the manual inspection of a person's proof of age document such as a driver's licence or passport. Palmer, Warren & Miller (2012) state that the first time a patron enters a venue, their ID is scanned and stored in a fixed or portable computer located on-site. On subsequent visits, their ID is automatically matched through computer software with a photograph taken of the patron every time they visit that venue. Notes can be added to stored records to highlight whether a patron has been banned from any venue for an alcohol related offence. Data can also be networked across all participating venues or matched with related police records.

Scanner technology varies from simple to sophisticated (Miller, Diment & Zinkiewicz 2012). One version may just record an image of a patron's ID, while another may compare the image on the ID to the photo taken of the patron, also analysing the images and comparing them to valid forms of ID.

Miller, Diment & Zinkiewicz (2012) claim the most commonly applied model is where the scanner records the IDs of patrons entering a venue and compiles the information in a database that can then be linked to other venues and police using ID scanners. If a patron uses a fake ID, or is thrown out of a venue for causing trouble, a note can be made against their name in the common database, preventing later access to other venues linked into the system.

Once personal information has been collected by scanning, it becomes digitised and has the potential to be used or disclosed for many other purposes such as direct marketing or the creation of customer databases (Commonwealth of Australia 2010). Collecting identity information in this way raises concerns around patron's privacy.

### **Concerns around privacy**

According to the Office of the Privacy Commissioner (Commonwealth of Australia 2010), patron's concerns around privacy are threefold:

- that their electronically stored personal information could be matched to personal information held by other organizations;
- that their personal information may be misused, especially with regard to identity information contained on proof of identity documents such as driver's licenses and passports; and
- that their stored personal information could be compromised through hacking, computer theft or other inappropriate access.

### **Dealing with Alcohol-related harm and the Night-Time Economy (DANTE)**

The DANTE study involved evaluating existing strategies to address alcohol-related harm (such as ID scanners) in the entertainment precincts of two regional Australian cities, one being Geelong, Victoria. According to Miller et al (2012), key informants highlighted a number of positives and negatives around ID scanning.

Positives included the:

- generation of trend data on patron characteristics that can be used for general marketing;
- ability to share information across venues;
- ability to be informed about patrons banned from other venues;
- detecting fake IDs;
- reducing underage entry;
- potential interface between police and ID scanning systems in licensed venues; and
- general perception around improved patron behaviour and reduced levels of violence within the venue.

Negatives of ID scanning included the:

- selective scanning to offset delays in patron entry and long queues resulting in discriminatory outcomes;
- interpersonal violence moves from inside venue to outside venue; and
- lack of privacy and storage.

Miller et al (2012) reported that despite licensees reporting some concerns among patrons over the use of ID scanners, this was offset by a broader perception that scanners had resulted in an improvement in patron behaviour and reduced levels of violence in venues using scanners.

Despite the perceived benefits to using ID scanners in licensed venues, Miller et al (2012) found that no obvious reductions in injury appeared to be associated with using them. Indeed, the implementation of ID scanners was associated with increases in emergency department injury attendances during high alcohol use hours. The Pubs and Clubs Project, a literature review of different policy and community-based interventions and in Geelong, Victoria, also concluded that ID scanners hadn't resulted in any sustained decrease in alcohol-related injury rates (VicHealth 2012).

In addition to this, ensuing analyses of Police assault records suggested a move from incidents of interpersonal violence inside venues to incidents outside venues (Miller et al 2012).

Despite the lack of evidence to support the implementation of ID scanners, Miller and colleagues (2012) state that Geelong's structured approach is attracting significant interest, highlighting the importance of properly evaluating this strategy.

Miller et al (2012) state that the appeal of using technology to fix social harms is often seen throughout history and, as shown by the DANTE study, are rarely effective.

Palmer et al (cited in Miller, Diment & Zinkiewicz 2012) found that while ID scanners are a popular countermeasure to alcohol-related violence in the night time economy, there was no evidence in emergency department frequencies to back up their use.

Indeed, Miller and colleagues (2012) claim that use of ID scanners is being embraced wholeheartedly by licensees and Police alike, yet there are no formal or independent evaluations of their effect under way, either locally, nationally or internationally

The World Health Organisation (2012) maintains that strategies such as ID scanners largely represent attempts to control social problems in areas where alcohol related harm in licensed venues is already a major problem.

*"An appraisal of similar measures implemented in the United Kingdom drinking environments suggested that without tackling the underlying causes of intoxication, such measures aim only to create drinking environments where it is "safe" for individuals to get drunk. Here, however, the concept of safety does not consider the risks associated with drunkenness once people have left managed drinking environments." WHO p66, 2012*

Conversely, Babor et al (2010) suggest that due to the lack of popularity around approaches such as increasing taxes on alcohol or reducing trading hours that most approaches targeting high risk environments, such as ID scanners are generally perceived as acceptable in most cultures and may be easier to implement.



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