



**WATFORD
BOROUGH
COUNCIL**

LICENSING COMMITTEE

11 January 2024

7.00 pm

Town Hall, Watford

Contact

Laura MacMillan

democraticservices@watford.gov.uk

01923 278376

For information about attending meetings please visit the [council's website](#).

Publication date: Wednesday, 3 January 2024

Committee Membership

Councillor R Wenham (Chair)

Councillor M Hofman (Vice-Chair)

Councillors D Allen-Williamson, M Devonish, S Feldman, A Grimston, P Hannon, L Nembhard, T Osborn, C Saunders, G Saffery, R Smith, M Turmaine, S Trebar and D Watling

Agenda

Part A - Open to the Public

1. Apologies for absence

2. Disclosure of interests

3. Minutes

The [minutes](#) of the meeting held on 28 September 2023 to be submitted and signed.

4. Review of Cumulative Impact Assessment under Statement of Licensing Policy 2023-2028 policy (Pages 3 - 39)

Part A

Report to: Licensing Committee

Date of meeting: Thursday, 11 January 2024

Report author: Senior Licensing Officer

Title: Review of Cumulative Impact Assessment under Statement of Licensing Policy 2023-2028

1.0 Summary

- 1.1 In its role as the licensing authority under the Licensing Act 2003 the council has a duty to prepare, and keep under review, a Statement of Licensing Policy. This policy was last reviewed in 2023 and has been in force since 20 November 2023.
- 1.2 Under this policy, the council has adopted a Cumulative Impact Policy within the town centre and is supported by a Cumulative Impact Assessment which sets out the justification for this policy.
- 1.3 The Cumulative Impact Assessment is required to be reviewed at least every three years. The current assessment expires in April 2024 and therefore the licensing authority are required to undertake a review of this assessment.
- 1.4 This report sets out the new evidence obtained from the Police with regards to maintaining and renewing the Cumulative Impact Assessment and Cumulative Impact Policy and details the proposed consultation for reviewing the assessment.

2.0 Risks

2.1

Nature of risk	Consequence	Suggested Control Measures	Response (treat, tolerate, terminate or transfer)	Risk Rating (combination of severity and likelihood)
Legal challenge from failure to properly adopt the policy or follow legislation	Failure to meet requirements under the Licensing Act and policy not being able to be implemented	Ensure that Cumulative Impact Assessment and Cumulative Impact Policy are both reviewed before 1 April 2024 and any new policy and	Treat	2

and Government guidance		assessment are implemented by this date		
Legal challenge from failure to properly consult	Negative perception of council and its licensing functions, and challenge through the courts	Carry out consultation in accordance with legal requirements under the Licensing Act 2003 and in accordance with the Government's published principles of consultation	Treat	2
Policy is unreasonable, irrational, discriminatory etc	Legal challenge through the Courts	Ensure that the results of the public consultation are taken into account in the final Cumulative Impact Assessment	Treat	2
Further legislation or reported cases arising during course of consultation and adopting policy	Policy may be outdated as soon as it is published	Monitor situation and, if necessary, take amendments to subsequent committee meetings	Treat	2

3.0 Recommendations

- 3.1 That the Committee approve the renewal and continuation of the cumulative impact assessment and cumulative impact policy for the town centre.
- 3.2 That the cumulative impact assessment be put out to consultation as set out in paragraphs 7.1 to 7.3 of the report, with the results of the consultation being presented to the March Licensing Committee.

Further information:

Austen Young, Senior Licensing Officer
austen.young@watford.gov.uk

Report approved by: Justine Hoy, Associate Director Housing and Wellbeing

4.0 Detailed proposal

- 4.1 The council is the licensing authority under the Licensing Act 2003 for alcohol, regulated entertainment and late night refreshment within the Borough. It is required to prepare, consult and keep under review a Statement of Licensing Policy (SLP) that sets out how it approaches its responsibilities under the Act, so that applicants, other statutory bodies and local bodies can ascertain its general approach to particular situations.
- 4.2 As part of the council's SLP, it has adopted a cumulative impact policy for the town centre (see Policy LP3). To support the cumulative impact policy, the council has published a cumulative impact assessment as it is legally required to do. Cumulative impact assessments must be kept under regular review and must be reviewed at least once every three years. The council's current cumulative impact assessment is due to expire on 1 April 2024.
- 4.3 To support the review of the cumulative impact assessment, officers have requested data from the Police and it is the opinion of officers that this data does justify seeking a renewal of the cumulative impact assessment.
- 4.4 This reports details the analysis of the Police data and proposes a consultation timetable for the cumulative impact assessment. The results of the consultation will then be brought before the next Licensing Committee in March for a final decision.

5.0 Cumulative Impact Assessment

- 5.1 The Licensing Act 2003 was amended so that any licensing authority has the discretion to publish a 'Cumulative Impact Assessment'. If published, this document must set out that the licensing authority considers that the number of relevant authorisations within the specified area is such that it is likely that granting any further licences in respect of the relevant location(s) would be inconsistent with the promotion of the licensing objectives. This document must also publish the evidence considered by the licensing authority in adopting the policy.
- 5.2 For the avoidance of doubt, the term 'authorisations' refers to both premises licences and club premises certificates. Please note that temporary event notices are not covered. When referring to granting any further authorisations, this includes variations to existing licences or certificates, even those in force before the policy is adopted.
- 5.3 The existing cumulative impact assessment was adopted on 1 April 2021 and is attached at appendix 1. The cumulative impact policy applies to the town centre and specifically covers the Parade and the High Street (from its junction with Beechen Grove and The Parade).

5.4 The statutory guidance gives the following examples of evidence that may be considered when drawing up and reviewing a cumulative impact assessment:

- local crime and disorder statistics, including statistics on specific types of crime and
- crime hotspots;
- statistics on local anti-social behaviour offences;
- health-related statistics such as alcohol-related emergency attendances and hospital admissions;
- environmental health complaints, particularly in relation to litter and noise;
- complaints recorded by the local authority, which may include complaints raised by
- local residents or residents' associations;
- residents' questionnaires;
- evidence from local and parish councillors; and
- evidence obtained through local consultation.

5.5 In preparation for the review of the cumulative impact assessment, the following data has been collected and analysed in accordance with the Statutory Guidance:

- noise complaints logged with the council's environmental health authority from commercial premises for the period of 01/04/2021-01/11/2023
- complaints received by the council's licensing authority for the period of 01/04/2021-01/11/2023
- anti-social behaviour and community safety complaints received by the council's community safety team for the period of 01/04/2021-01/11/2023
- crime and disorder statistics from Hertfordshire Constabulary for the period of 01/04/2021-01/04/2023

5.6 This data was considered appropriate to collate and analyse in order to establish the cumulative impact of the licensed premises in the town centre and to compare to the existing cumulative impact assessment.

5.7 For the sake of allowing comparison, there were 98 licensed premises within the cumulative impact zone as of 31 October 2020 when the data was collected for the preparation of the existing cumulative impact assessment. As of 1 November 2023 when the data was collected for this review there were 85 licensed premises within the cumulative impact zone and a total of 364 licensed premises throughout the whole borough.

5.8 **Noise complaints**

- 5.9 The data for logged noise complaints did not explicitly show that there is a direct correlation between the number of licensed premises within the town centre and the level of complaints received from residents.
- 5.10 In general, the level of noise complaints received from licensed premises within the town centre did not show a consistent level of complaints and although there was an increase in complaints received the number of complaints received for licensed premises within the town centre was not significant enough to warrant a change in policy. The council received a total number of 38 noise complaints relating to licensed premises within the cumulative impact zone over the period of 01/04/2021 to 01/11/2023, with 12 of these complaints relating to one individual premises. A total of 144 complaints were logged against licensed premises throughout the whole borough. This equates to 26.38% of noise complaints about licensed premises occurring within the cumulative impact zone which in turn consist of 23.41% of all licensed premises.
- 5.11 This does not show that a majority of complaints relate to town centre premises, although the increase in complaints is something which officers will continue to monitor. It should also be noted that officers are still investigating complaints regarding the premises which generated 12 separate complaints and if this issue is addressed satisfactorily then that will have a positive impact on the town centre and residents.
- 5.12 Complaints received by the licensing authority**
- 5.13 The evidence of complaints logged by the licensing authority did not show a direct correlation between the number of licensed premises within the town centre and the details of the complaints received from residents.
- 5.14 The overwhelming majority of complaints received and logged by the licensing authority were related to taxis. A total of 53 complaints were received relevant to the Licensing Act 2003, of which 12 were against premises located in the cumulative impact zone. There is no significant evidence obtained from analysing the complaints to the licensing authority to take into consideration with regards to the review of the cumulative impact assessment.
- 5.15 Community safety complaints**
- 5.16 The evidence of complaints logged by the community safety team did not show a direct correlation between the number of licensed premises within the town centre and the details of the complaints received from residents or referrals or enquires made by partner agencies.
- 5.17 It is acknowledged that community safety complaints are not likely to be made specifically regarding commercial premises as these would be logged under

separate codes by officers, but the data is useful to analyse for any general comments or complaints made particular locations or hotspots of ASB.

5.18 Within the cumulative impact zone, the only complaints received were with regards to rough sleepers and street drinkers, although few complaints were made the council is aware of this issue anyway. The concerns raised over rough sleepers within the town centre are being managed by the Town Centre Action Group under the supervision of the council's Community Safety Manager. It is not felt that it is appropriate to address this issue through the council's licensing policy, and complaints about specific premises encouraging street drinking will be investigated on a case-by-case basis.

5.19 Police crime and disorder statistics

5.20 The data received from the Police forms the basis of the proposal to review and renew the cumulative impact assessment. There is a correlation between the number of incidents of alcohol-related crime and offences of theft in the High Street and The Parade and the incidents of crime within licensed premises.

5.21 It is acknowledged by the Police that the number of incidents over the reporting period do show an increase in offences but this was expected due to the relaxation of restrictions in place during the Covid-19 pandemic.

5.22 The number of offences remain very similar when compared to the data used for the existing cumulative impact assessment despite the restrictions which were in place over the pandemic and the reduction in licensed premises numbers. The Police do comment themselves that levels are comparable to 2019, i.e. the last full reporting period before the pandemic. This is a trend which was established when adopting the council's current cumulative impact assessment and one which has not shown signs of abating.

5.23 Using this data, a draft cumulative impact assessment has been prepared and is attached at appendix 2. This contains further justification for the proposed cumulative impact assessment.

5.24 In summary, the situation has not significantly improved, nor has it significantly worsened despite the number of licensed premises within the cumulative impact zone actually falling.

5.25 It is therefore the opinion of officers that this does establish justification in maintaining the cumulative impact assessment and the cumulative impact policy. It would be appropriate to continue with the cumulative impact zone and therefore the cumulative impact assessment.

- 5.26 While the total number of crimes reported has fallen (8054 offences in the 2020 dataset compared to 7433 in the 2023 dataset) the reporting period for 2020 was longer, covering 2 years and 2 months and the reporting period for 2023 was for 2 years only. Both reporting periods have been impacted by the pandemic and lockdowns, but the Police do establish that crime numbers have returned to a level similar to 2019 before the pandemic. As indicated earlier, there has also been a fall in the number of licensed premises within the town centre from 90 in 2020 to 85 in November 2023, albeit one which has shown signs of improvement with an increase from 82 premises in April 2023.
- 5.27 The Police also highlight that the hours between 22:00 and 04:00, which form the basis of the night-time economy hours, do see an increase of incidents particularly between the hours of midnight to 03:00 on Saturday morning and midnight to 04:00 on Sunday morning. The majority of premises within The Parade and the High Street are licensed to trade during these hours and are permitted to sell alcohol, and this is the same as was for 2020 when compiling the existing cumulative impact assessment. This would continue the link between these licensed premises and the instances of alcohol-related crime and disorder.
- 5.28 With regards to offences, it is highlighted that assault with injury is the primary offence committed within the council's night-time economy premises. In total, the level of assaults (with and without injury) reported are comparable to the level of assaults in the 2020 dataset. This shows that visitors to the town centre are more likely to be a victim of assault than any other offence.
- 5.29 To address this, officers propose continuing with the current cumulative impact assessment and the proposals contained within aimed at restricting vertical drinking establishments and encouraging more entertainment and food led venues, with particular conditions being considered for premises wishing to trade beyond 22:00 when levels of crime rise.
- 5.30 Members are reminded that the council has a duty under Section 17 of the Crime and Disorder Act 1998 to give due regard to the likely effect of the exercise of its functions on crime and disorder in its area and to do all it reasonably can to prevent these. In seeking to promote the licensing objective of the prevention of crime and disorder by putting alcohol premises under scrutiny and applying a specific policy to them, the council will be promoting its duty under this Act.

6.0 Statement of Licensing Policy

- 6.1 Officers are not proposing any changes to the cumulative impact assessment although it is acknowledged that the assessment must go out for consultation. At this time there are not proposed changes to the council's current statement of licensing policy which was adopted by the council in November 2023.

6.2 However, should the consultation result in changes to the assessment, it may be necessary to update or change the licensing policy. Such matters will be brought before Committee as appropriate.

7.0 Consultation

7.1 A cumulative impact assessment must go out for consultation with the following bodies:

- Hertfordshire Constabulary
- Hertfordshire Fire & Rescue Service
- Public Health at Hertfordshire County Council
- such persons as the licensing authority considers to be representative of holders of premises licences issued by that authority,
- such persons as the licensing authority considers to be representative of holders of club premises certificates issued by that authority,
- such persons as the licensing authority considers to be representative of holders of personal licences issued by that authority, and
- such other persons as the licensing authority considers to be representative of businesses and residents in its area

This is the same as the list of bodies that must be consulted on any changes to the council's statement of licensing policy.

7.2 Officers would propose that we consult the following, as has been the case with previous licensing policy consultations and the previous consultation on the cumulative impact assessment:

- residents' associations
- all residents within The Parade and High Street, as special consideration is given to these areas
- Watford Community Safety Partnership
- Watford Town Centre BID
- all licensed premises and club premises (both as holders of authorisations and as representatives of personal licence holders)
- the statutory responsible authorities

7.3 Consultation will be undertaken in accordance with the Government's Consultation Principles and in conjunction with the council's communications team. It would commence within five working days and run until 16 February 2024, being at least 4 weeks.

8.0 Implications

8.1 **Financial**

8.2 The Chief Finance Officer comments that the recommendations can be delivered within existing resources.

8.3 **Legal Issues** (Monitoring Officer)

8.4 The Group Head of Democracy and Governance comments that the legal implications are contained within the body of the report.

8.5 **Equalities, Human Rights and Data Protection**

8.6 A new equalities impact assessment will need to be completed as a result of any changes to policy.

8.7 **Crime and Disorder**

8.8 The council is required to consider the effect on crime and disorder when adopting any new or revised policy. One of the licensing objectives is the prevention of crime and disorder.

Appendices

Appendix 1 – Existing cumulative impact assessment (2021-2024)

Appendix 2 – Proposed cumulative impact assessment (2024-2027)

Background papers

Revised Guidance issued under s182 of the Licensing Act 2003 (Home Office, December 2023)

Crime and disorder statistics from Hertfordshire Constabulary for the period of 01/04/2021-01/04/2023

noise complaints logged with the council's environmental health authority from commercial premises for the period of 01/04/2021-01/11/2023

complaints received by the council's licensing authority for the period of 01/04/2021-01/11/2023

anti-social behaviour and community safety complaints received by the council's community safety team for the period of 01/04/2021-01/11/2023

Cumulative Impact Assessment 2021-2024

Watford Borough Council's Statement of Licensing Policy (2023-2028)

APPENDIX 1



LICENSING ACT 2003

CUMULATIVE IMPACT ASSESSMENT

APRIL 2021

Comments are invited on this document to:

Community Protection
Watford Borough Council
Town Hall
Watford
Hertfordshire
WD17 3EX

Tel: 01923 278476
Email: licensing@watford.gov.uk

Cumulative Impact Assessment

The concept of cumulative impact has been described within the guidance issued by the Government under section 182 of the Licensing Act 2003 ('the s182 Guidance') since the commencement of the Licensing Act 2003 ('the Act'). Watford Borough Council, as a licensing authority, has had a special policy in place since the commencement of the Act in 2005 relating to the town centre, which has been referred to as a cumulative impact policy.

The Policing and Crime Act 2017 amended the Licensing Act 2003 to place cumulative impact policies on a statutory footing by introducing section 5A of the Act. The amended legislation came into force in April 2018

This cumulative impact assessment is being published under these provisions of the Act. The assessment is required to be reviewed every three years from the date it came into force. The Act sets out which parties must be consulted on the assessment.

The term 'cumulative impact' is described within the s182 Guidance as:

"the potential impact on the promotion of the licensing objectives of a number of licensed premises concentrated in one area"

The s182 Guidance goes on to state that if the type or density of licensed premises, such as those selling alcohol or providing late night refreshment, is high, then problems of nuisance and disorder may arise, as well as from concentrating a large number of drinkers in a particular area when leaving a particular area.

Covid-19 Statement

This assessment is being compiled using data collated up to and including October 2020. It is recognised by the licensing authority that the Covid-19 pandemic will have influenced data collection over the period of March to October 2020, due to the effect that the national lockdown had on the Borough and the country as a whole, with all but essential services being required to shut and people being encouraged to stay at home. This will have an effect on the analysis of the data. Data from this period is included for transparency and openness, but it does need to be considered against the wider national picture. Any long-term effects of the pandemic upon public and business behaviour are likely to be established over the forthcoming months and years.

Findings of the Cumulative Impact Assessment

In studying the data obtained, provided in this assessment, the licensing authority does consider that the number of alcohol-licensed premises within the High Street and The Parade is such that it is likely that granting further authorisations which allow the consumption of alcohol on the premises (whether this is for consumption only on the premises, or both on and off the premises) would be inconsistent with the licensing authority's duty to promote the licensing

objectives, specifically the licensing objective of the prevention of crime and disorder. The crime statistics provided by the police show that the High Street and The Parade have significantly higher crime statistics, particularly for alcohol-related crime, than other areas of the borough. The peak time for these offences occurring is during the night-time economy. Therefore, the council has adopted a cumulative impact policy for the High Street and The Parade.

The cumulative impact policy shall apply to any application for a new premises licence or club premises certificate. The policy cannot be retroactively applied to existing licensed premises, but may be taken into consideration for any variations of existing authorisations, with special consideration given where there are representations concerning the licensing objective of crime and disorder, or any application to increase the capacity of a premises or the availability of alcohol sold at the relevant premises.

The policy does not apply to temporary event notices, although the s182 Guidance does state that it is open to the police and environmental health authority (as relevant persons) to refer to evidence published within this assessment when objecting to a notice.

The policy does not change the fundamental way in which decisions are made under the Act. Each application is required to be considered upon its own merits and goes through a public consultation. Should there be relevant representations submitted against an application, which are not withdrawn, and the matter is brought before a licensing sub-committee for determination, it will be for the committee to decide if the policy should be engaged and applied. It is possible for the licensing sub-committee to make an exception to policy where they consider it appropriate to do so. Where no representations are received against an application, even for an application within the policy area, the Act requires that the application be granted. It will still remain the responsibility of the licensing sub-committee to show that the grant of the application would undermine the promotion of one or more of the licensing objectives and that appropriate conditions would be ineffective in preventing the problems involved.

The cumulative impact policy shall not apply to the following premises:

- 1) where the supply of alcohol shall only be ancillary to a substantial table meal
- 2) where the supply of alcohol shall only by waiter/waitress service only to seated customers
- 3) where the supply of alcohol does not extend past 10pm on any day

In any other case where an applicant wishes to be considered as an exception to the policy, the responsibility is with them to show why they should be considered and not on the licensing committee to show why an exception should be made.

Exceptions to policy will not be made on the grounds that:

- 1) the building design is of a high standard; we would expect all applicants will want to ensure the highest design standards possible;
- 2) that the applicant is of good character; it is a legal requirement that premises selling alcohol must be under the management of a designated premises supervisor, who must themselves hold a personal licence to sell alcohol;
- 3) that the premises are small; even small premises can contribute to crime, disorder and nuisance

Where an exception is made, the licensing committee may consider attaching specific conditions to the relevant authorisation requiring the use of door supervisors to monitor and control access to the premises and assist with dispersal, to install and maintain an electronic identification entry system which meets the reasonable requirements of Hertfordshire Constabulary, to make a monetary contribution to the town centre taxi marshal scheme (or such a replacement scheme which may be introduced to assist in the dispersal of customers from the town centre) and that the premises will actively participate in the town centre Pubwatch scheme and/or the Pubwatch radio scheme (or such a replacement scheme which may be introduced to assist in communication between venues).

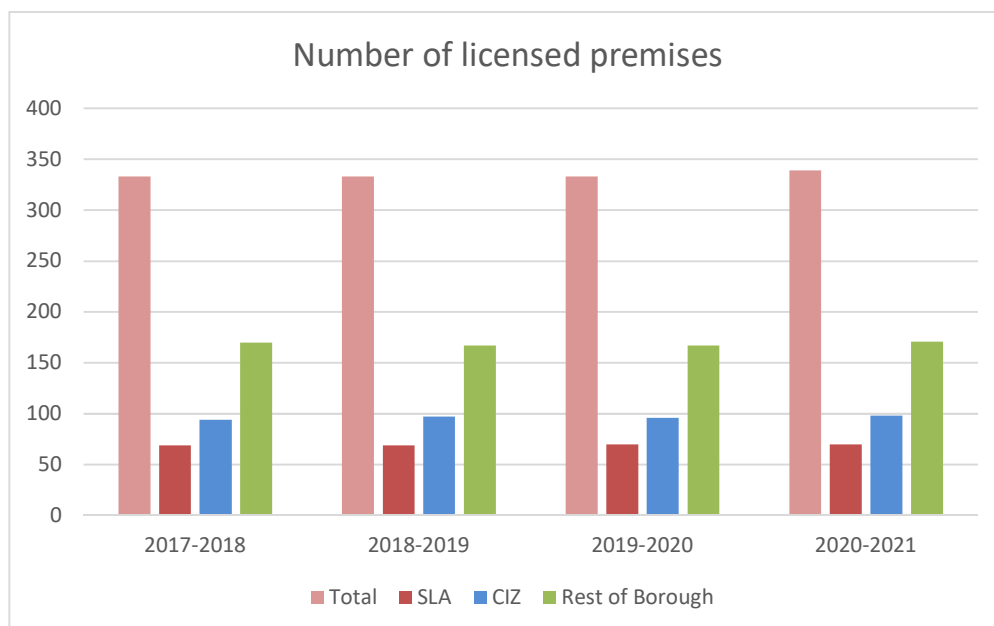
Cumulative Impact Assessment Data

Background Data

As of 31 October 2020, there were 339 authorisations issued by Watford Borough Council under the Licensing Act 2003. There were 322 premises licences and 17 club premises certificates.

The majority of licensed premises are located within the Central ward, which covers the town centre, with 143 premises being located within this ward, consisting of 142 premises licences and 1 club premises certificate.

The following graph shows the distribution of authorisations between the cumulative impact zone (CIZ), the council's sensitive licensing areas (SLA), both of which were as detailed within the council's Statement of Licensing Policy 2018-2023, and the rest of the Borough. It has been decided to compare the figures between the two policy areas simply for the ease of comparison.



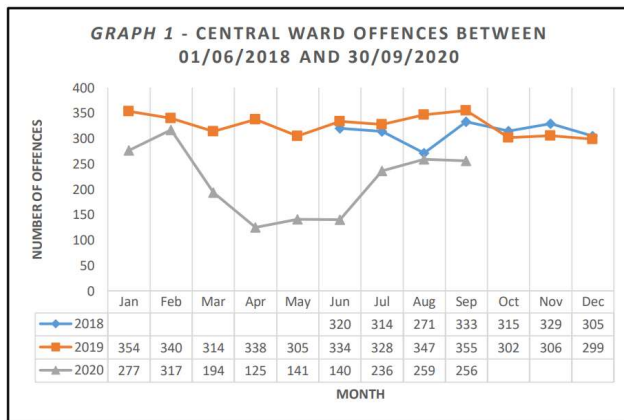
98 authorisations were in force within the cumulative impact zone, 70 authorisations were in force within the council’s sensitive licensed areas, and 171 authorisations were in force in the rest of the borough. The figures have remained relatively similar over the reporting period, with no significant increases or decreases in figures.

Most data has been gathered for the financial years of 2017-2018 to 2020-2021 (up to 31/10/2020). This is to allow for comparison between different sets of data, and to identify any trends. It should be noted that the council’s Statement of Licensing Policy 2018-2023 took effect from November 2018.

Data supplied by Hertfordshire Constabulary

Data was supplied by Hertfordshire constabulary with regards to crime statistics. The police data relates to the period of 01/06/2018 and 30/09/2020. The Police refer to this area as CC1 Central Ward with regards to recording locations of crimes and offences.

In this period, 8054 offences were committed within the ward between the dates specified. It is noted that offence numbers were generally similar for both 2018 and 2019, with a noticeable exception for Aug 2018. This data is presented within the police’s graph 1. It is also acknowledged that 2020 saw offence numbers drop between March and June due to COVID-19 lockdown restrictions, but started to rise when premises began to re-open.



Offence Category	Count of Offences
THEFT	3149
VIOLENCE AGAINST THE PERSON	1777
NON-CRIME	738
PUBLIC ORDER OFFENCES	544
ARSON AND CRIMINAL DAMAGE	388
DRUG OFFENCES	325
VEHICLE OFFENCES	325
NON-NOTIFIABLE	203
ROBBERY	147
BURGLARY	137
SEXUAL OFFENCES	125
MISCELLANEOUS CRIMES AGAINST SOCIETY	103
POSSESSION OF WEAPONS	93

Table 1 – Number of offences per offence category.

As can be seen by table 1, theft and violence against the person accounted for most offences at over 61% of offences.

The police advise that there were no prevalent days or times noted with regards to the offences of theft and violence against the person, with the exception of alcohol-related offences as detailed later, although it is noted that there is a reduction in the number of offences occurring between 03:00 and 08:00. This is after most licensed premises within the town centre have stopped serving alcohol or have closed, where customers would be expected to be dispersing from the town centre.

There were 611 offences recorded as being alcohol-related. For the purpose of this data collection, alcohol-related offences refer to where the offenders and / or victims have been noted on police systems as having been intoxicated. Alcohol-related offences mostly take place between 19:00 and 04:00.

Street Name	Count of offences
The Parade High Street**	314
Market Street	26
Albert Road South	25
Station Road	17
Vicarage Road***	14
Clarendon Road	13
Estcourt Road	10
St Albans Road	10

Table 2 – list of streets which have experienced 10 or more offences.

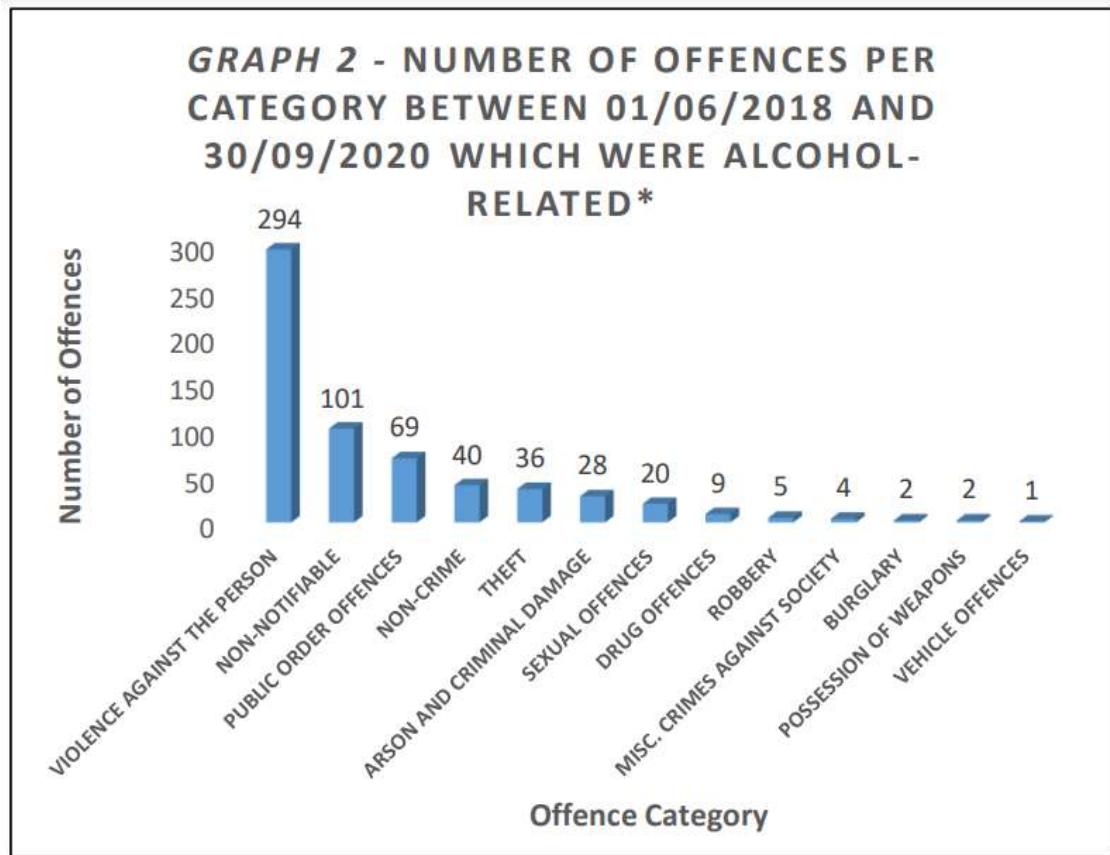
Street Name	Count of offences
The Parade High Street **	314
Market Street	26
Albert Road South	25
Clarendon Road	13
Queens Road	8
Wellstones	6
Church Street	5
George Street	1
New Street	1
King Street	1

Table 3 – list of streets of interest and offence numbers.

As can be seen by table 2, The Parade and High Street saw the most recorded alcohol-related offences. The police acknowledge that this may be expected due to the high volume of people visiting the area in comparison to other areas of the Borough, and the availability of alcohol within the vicinity. Over 50% of alcohol-related offences occur within The Parade and the High Street, and it is therefore appropriate that focus is centred on this location. For the purpose of this data, all variations of High Street / The Parade / The Parade High Street have been combined (identified by the **) Offences committed at Watford General Hospital are included within the stats for Vicarage Road (identified by ***).

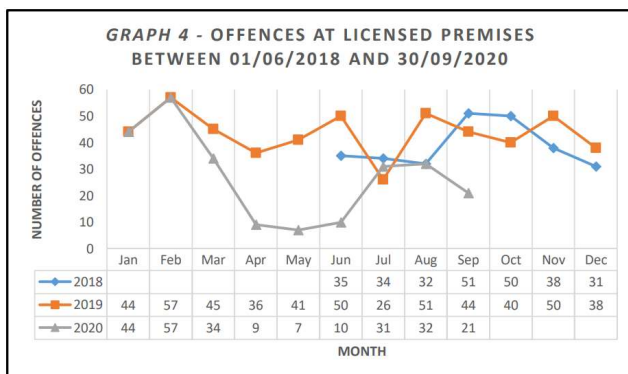
Streets of interest, as identified by table 3, are streets which are subject to specific focus from the police due to levels of crime within the area or local concerns. It is noted that The Parade and High Street appear to be justified as a location of concern.

The majority of these alcohol-related offences were classified as violence against the person, accounting for 48% of all alcohol-related crimes, as can be seen by the police’s graph 2. Again, for the purpose of this data collection, alcohol-related offences refer to where the offenders and / or victims have been noted on police systems as having been intoxicated. This shows that there is high chance of someone being attacked by someone who is intoxicated, or where the victim is intoxicated, and are more likely to be a victim of such crime than other offences.



The police data accounted for 90 licensed premises within the town centre. This discrepancy from the actual number of licensed premises issued by the council can be explained by the fact that the police are notified by the licensing authority when licences are granted and keep their own records, and this data may not be as accurate as the records held by the licensing authority through human error and not necessarily deliberate intent, One premises licence was issued by the council on 27 October 2020, which is outside of the police’s dataset. One licence has also lapsed after 30 September 2020. The council also have issued three shadow premises licences, which are licences which are not currently being used and relate to existing licensed premises.

Of the total 8054 offences committed within Central ward CC1, 1038 (13%) of offences occurred within licensed premises.



Offence Category	Count of Offences
THEFT	502
VIOLENCE AGAINST THE PERSON	283
PUBLIC ORDER OFFENCES	62
DRUG OFFENCES	46
ARSON AND CRIMINAL DAMAGE	33
NON-CRIME	31
SEXUAL OFFENCES	24
BURGLARY	14
MISCELLANEOUS CRIMES AGAINST SOCIETY	11
NON-NOTIFIABLE	11
VEHICLE OFFENCES	10
POSSESSION OF WEAPONS	7
ROBBERY	4

Table 6 – Number of offences per offence category.

It is interesting to note that offences started to increase when the national lockdown in response to Covid-19 ended, but then fell in August and September 2020, which was the period when licensed premises were allowed to open but with restrictions on how many people could meet in one group and with social distancing in place within premises, therefore reducing their capacity, and when alcohol-licensed premises had to close at 22:00.

Theft and violence against the person offences accounted for 76% of all offences committed at licensed premises, as can be seen in the police’s table 6. It must be noted that licensed premises includes not only pubs and bars but supermarkets and off-licences as well.

The police have provided a breakdown of alcohol-related offences committed at particular licensed premises at table 8, which also highlights the main trading hours of the night-time economy (NTE) between 22:00 and 04:00. DA in for the following table refers to incidents of domestic violence.

Location of Offences	All Alcohol Related*	22:00 to 04:00 Alcohol-Related*	22:00 to 04:00 Not DA	% 22:00 to 04:00 Alcohol-Related*	% 22:00 to 04:00 Not DA
Across Central Ward	611	393	336	64.32	54.99
Licensed Premises	145	107	100	73.79	68.97
Licensed - Fast food	4	3	2	75	50
Licensed - Hotel	9	7	4	77.78	44.44
Licensed - NTE	116	91	88	78.45	75.86
Licensed - Supermarket	5	1	1	20	20
Licensed - Restaurant / Café	10	5	5	50	50
Licensed - Off License	1	0	0	0	0

Table 8 – Breakdown of alcohol-related* offences across Central Ward and at licensed premises.

More than half of all alcohol-related offences within Central Ward CC1 were committed in the 6 hours between 22:00 and 04:00. This shows that the majority of alcohol-related crime, where police involvement is required, occurs during the period of 22:00 and 04:00 and is primarily focussed around night-time licensed venues. While this is somewhat to be expected given the operation of these venues, the evidence does prove that night-time economy venues are a

contributing factor to the crime statistics, more so than late night take-aways, restaurants or hotels.

Of the 98 licensed premises within the council's CIZ, 79 are located within the High Street and The Parade. Of these 79 premises, 72 allow the sale of alcohol. The breakdown of the number of premises by licensable activity are included in the table below. This data is supplied by the licensing authority.

Licensable activity	Number of premises
Supply of alcohol (consumption on premises)	20
Supply of alcohol (consumption off premises)	13
Supply of alcohol (consumption both on and off premises)	39
Late night refreshment only	7
Regulated entertainment only	0

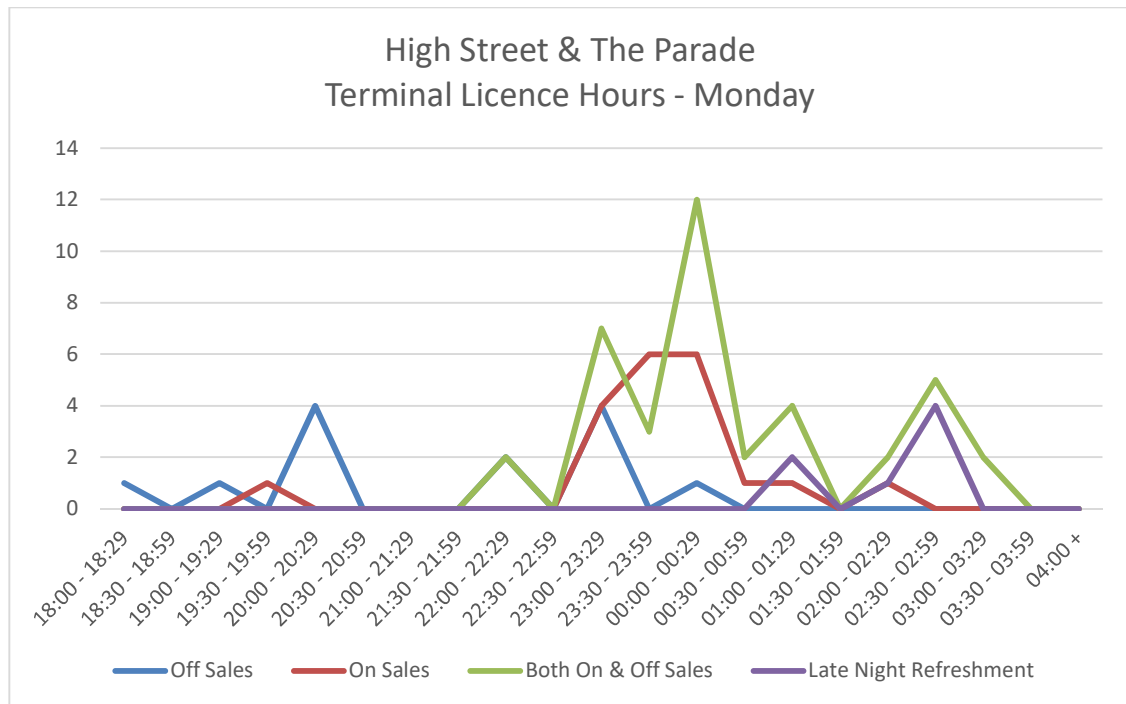
It is acknowledged that not all premises which sell alcohol only sell alcohol as a licensable activity. The full breakdown of the number of premises offering licensable activities, and which activities they can offer, is included in the following table. Again, this data is supplied by the licensing authority.

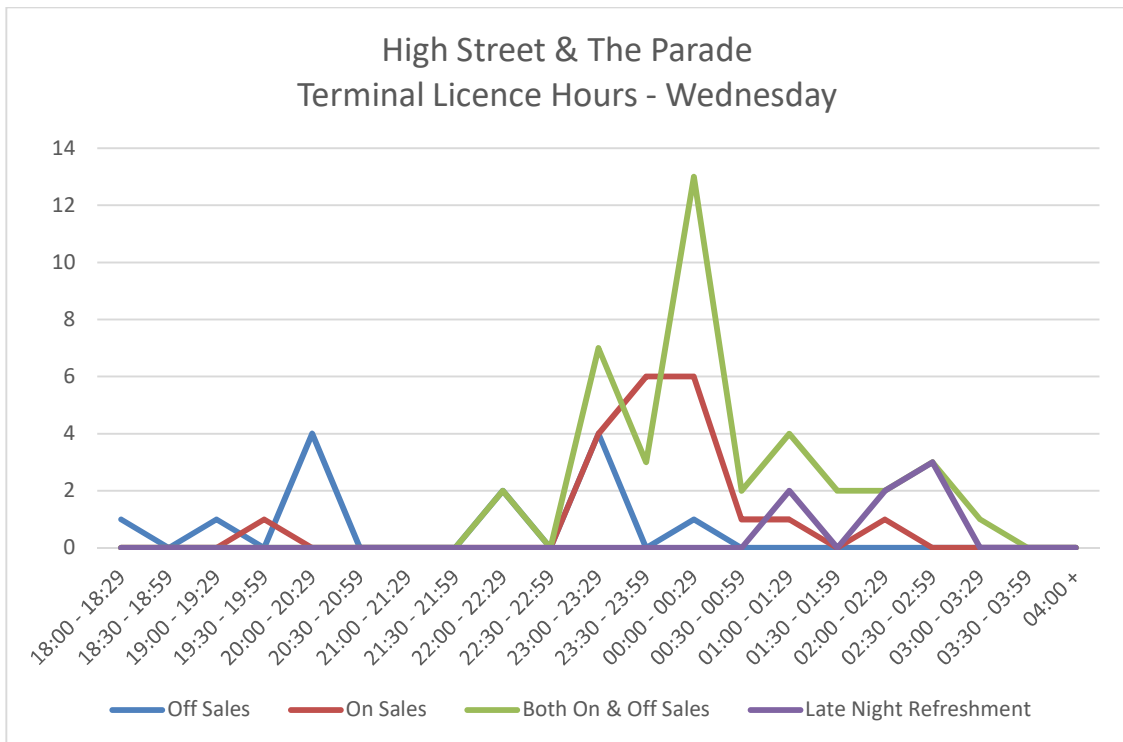
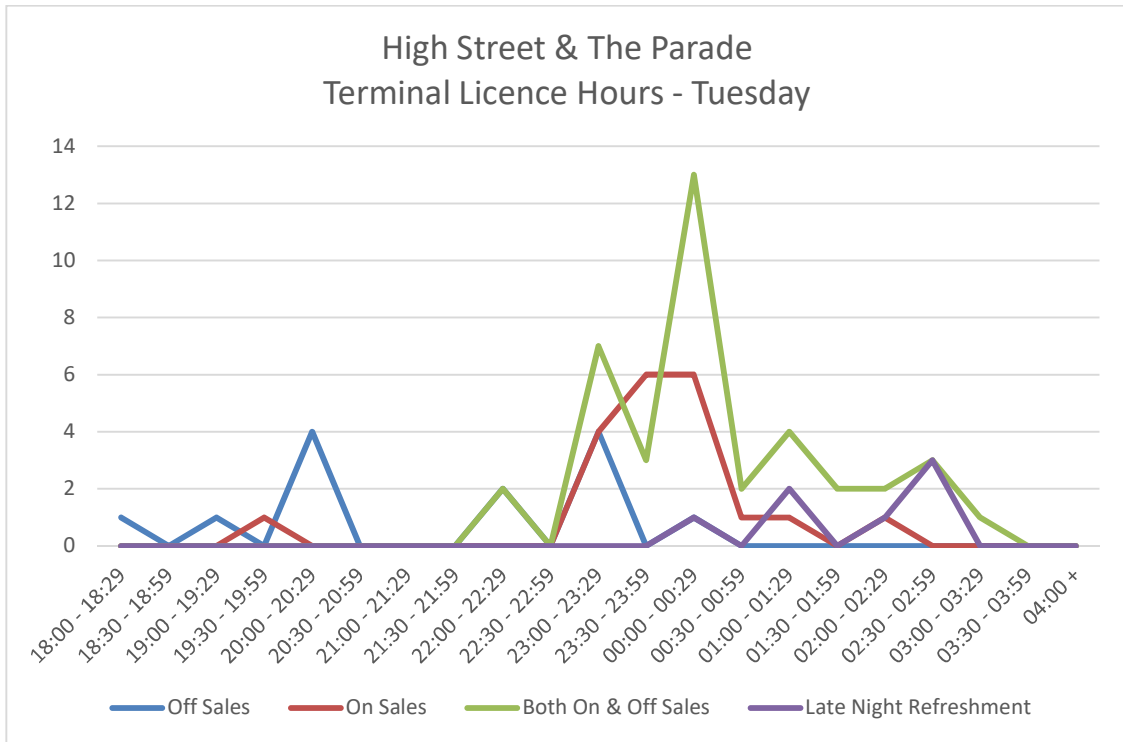
Licensable Activities	Number of Premises
Supply of Alcohol (both on- and off-sales premises) only	3
Late night refreshment only	6
Supply of Alcohol (off-sales) only	12
Supply of Alcohol (on-sales) only	4
Supply of Alcohol (both on- and off-sales) & Late night refreshment	8
Supply of Alcohol (both on- and off-sales) & Regulated entertainment	3
Supply of Alcohol (off-sales) & Regulated entertainment	1
Supply of Alcohol (on-sales) & Late night refreshment	4
Supply of Alcohol (on-sales) & Regulated entertainment	1
Regulated entertainment & Late night refreshment	1
Supply of Alcohol (both on- and off-sales), Regulated entertainment & Late night refreshment	25
Supply of Alcohol (on-sales), Regulated entertainment & Late night refreshment	11

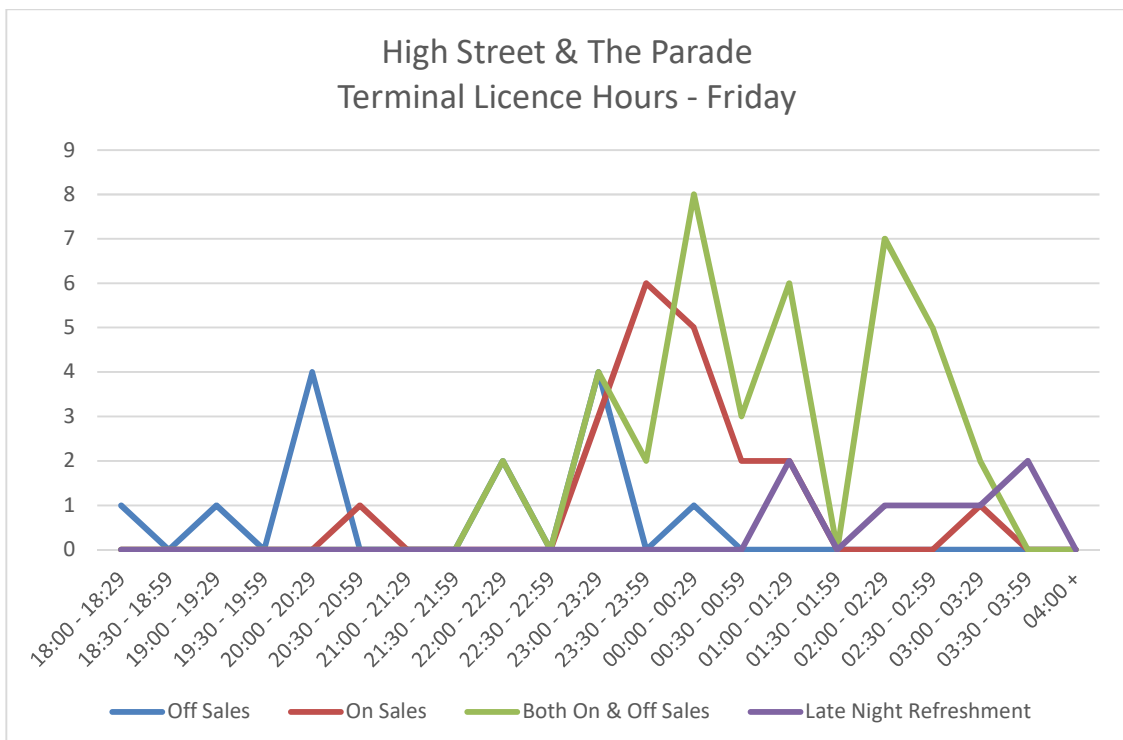
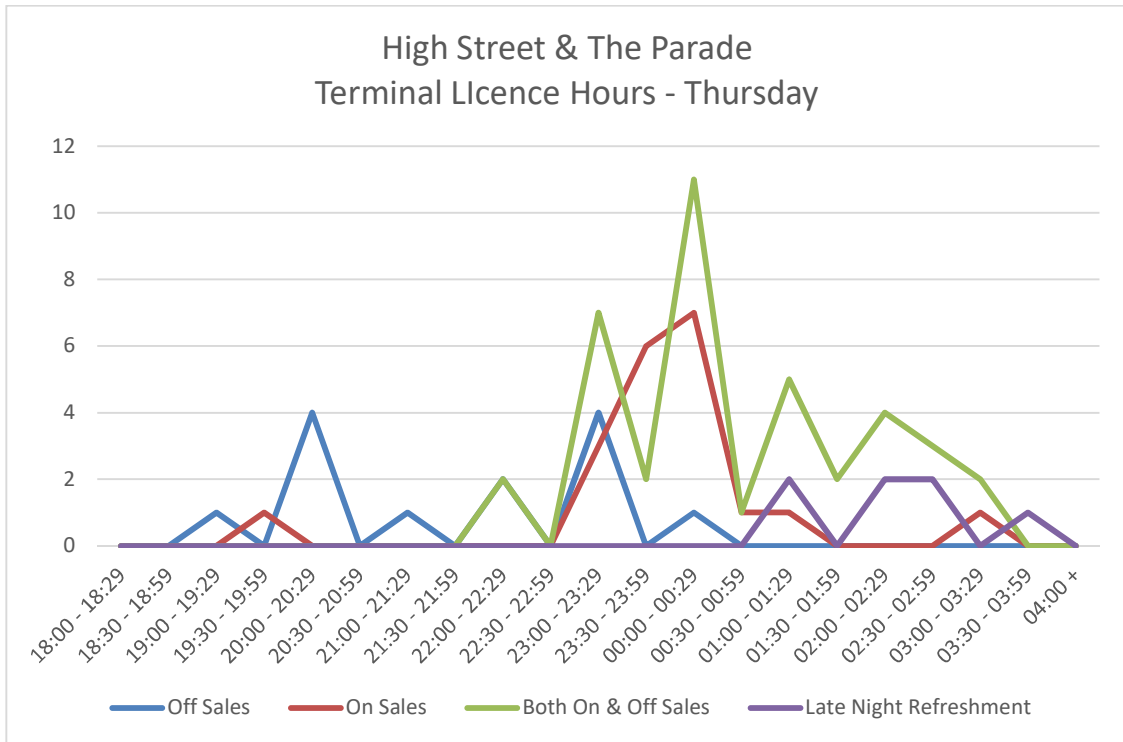
The terminal hours for these licensable activities extend later into the night closer to the weekend. The following graphs show the distribution of terminal hours for these licences for each day of the week, with noticeable peaks of later hours for alcohol sales on Thursdays, Fridays and Saturdays.

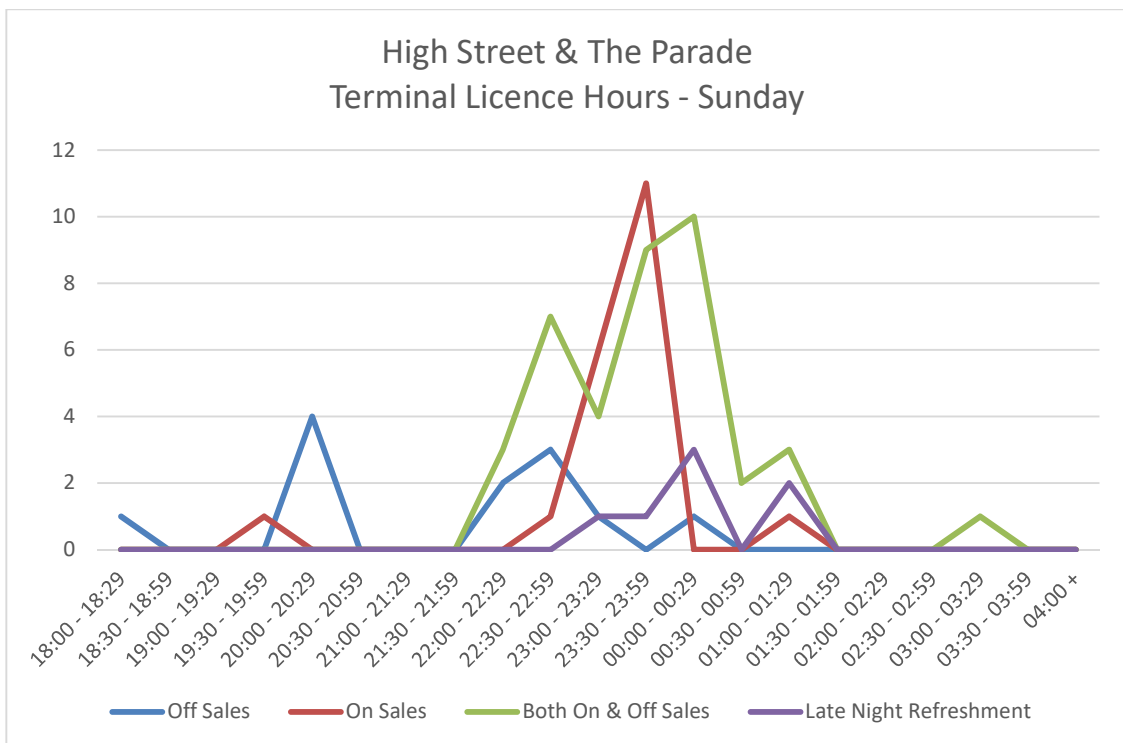
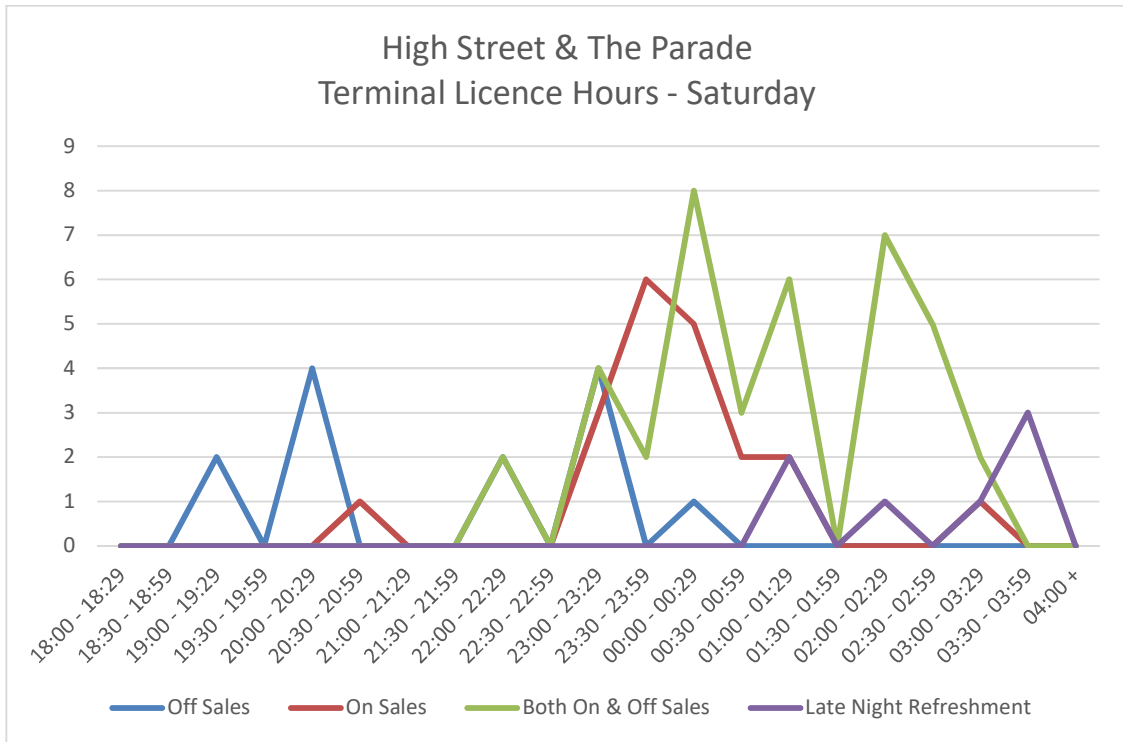
There is one premises which allows the sale of alcohol for 24 hours, and is therefore not included in these graphs. This premises is a hotel.

The majority of premises trade beyond 22:00, which appears to justify the police’s approach of classifying these premises as trading in the night-time economy. The police have advised that offence numbers tend to fall during the period of 03:00 to 08:00. As can be seen by the following graphs, this is after the terminal hour of the majority of licensed premises and this is when customers should be dispersing from the town centre.









APPENDIX 2



LICENSING ACT 2003

CUMULATIVE IMPACT ASSESSMENT

APRIL 2024

Comments are invited on this document to:

Housing & Wellbeing
Watford Borough Council
Town Hall
Watford
Hertfordshire
WD17 3EX

Tel: 01923 278476

Email: licensing@watford.gov.uk

Cumulative Impact Assessment

The concept of cumulative impact has been described within the guidance issued by the Government under section 182 of the Licensing Act 2003 ('the s182 Guidance') since the commencement of the Licensing Act 2003 ('the Act'). Watford Borough Council, as a licensing authority, has had a special policy in place since the commencement of the Act in 2005 relating to the town centre, which has been referred to as a cumulative impact policy.

The Policing and Crime Act 2017 amended the Licensing Act 2003 to place cumulative impact policies on a statutory footing by introducing section 5A of the Act. The amended legislation came into force in April 2018

This cumulative impact assessment is being published under these provisions of the Act. The assessment is required to be reviewed every three years from the date it came into force. The Act sets out which parties must be consulted on the assessment.

The term 'cumulative impact' is described within the s182 Guidance as:

"the potential impact on the promotion of the licensing objectives of a number of licensed premises concentrated in one area"

The s182 Guidance goes on to state that if the type or density of licensed premises, such as those selling alcohol or providing late night refreshment, is high, then problems of nuisance and disorder may arise, as well as from concentrating a large number of drinkers in a particular area when leaving a particular area.

Covid-19 Statement

This assessment is being compiled using data collated between April 2021 and November 2023 inclusive. It is recognised by the licensing authority that the Covid-19 pandemic will have influenced data collection over the period of April 2021 and March 2022 when all restrictions were relaxed, due to the effect that the national lockdown had on the Borough and the country as a whole. This will have an effect on the analysis of the data within this period, not only because indoor hospitality was only allowed to reopen from May 2021 but there is the unknown impact on the public and their willingness to socialise during a pandemic. Data from this period is included for transparency and openness, but it does need to be considered against the wider national picture. Any long-term effects of the pandemic upon public and business behaviour are still being established and will be continue to be reviewed.

Findings of the Cumulative Impact Assessment

In studying the data obtained, provided in this assessment, the licensing authority does consider that the number of alcohol-licensed premises within The Parade and the High Street is such that it is likely that granting further authorisations which allow the consumption of alcohol on the premises (whether this is for consumption only on the premises, or both on and off the

premises) would be inconsistent with the licensing authority's duty to promote the licensing objectives, specifically the licensing objective of the prevention of crime and disorder. The crime statistics provided by the police show that The Parade and the High Street have significantly higher crime statistics, particularly for alcohol-related crime, than other areas of the borough. The peak time for these offences occurring is during the night-time economy. Therefore, the council has adopted a cumulative impact policy for The Parade and the High Street

The cumulative impact policy shall apply to any application for a new premises licence or club premises certificate. The policy cannot be retroactively applied to existing licensed premises, but may be taken into consideration for any variations of existing authorisations, with special consideration given where there are representations concerning the licensing objective of crime and disorder, or any application to increase the capacity of a premises or the availability of alcohol sold at the relevant premises.

The policy does not apply to temporary event notices, although the s182 Guidance does state that it is open to the police and environmental health authority (as relevant persons) to refer to evidence published within this assessment when objecting to a notice.

The policy does not change the fundamental way in which decisions are made under the Act. Each application is required to be considered upon its own merits and goes through a public consultation. Should there be relevant representations submitted against an application, which are not withdrawn, and the matter is brought before a licensing sub-committee for determination, it will be for the committee to decide if the policy should be engaged and applied. It is possible for the licensing sub-committee to make an exception to policy where they consider it appropriate to do so. Where no representations are received against an application, even for an application within the policy area, the Act requires that the application be granted. It will still remain the responsibility of the licensing sub-committee to show that the grant of the application would undermine the promotion of one or more of the licensing objectives and that appropriate conditions would be ineffective in preventing the problems involved.

The cumulative impact policy shall not apply to the following premises:

- 1) where the supply of alcohol shall only be ancillary to a substantial table meal
- 2) where the supply of alcohol shall only by waiter/waitress service only to seated customers
- 3) where the supply of alcohol does not extend past 10pm on any day

In any other case where an applicant wishes to be considered as an exception to the policy, the responsibility is with them to show why they should be considered and not on the licensing committee to show why an exception should be made.

Exceptions to policy will not be made on the grounds that:

- 1) the building design is of a high standard; we would expect all applicants will want to ensure the highest design standards possible;
- 2) that the applicant is of good character; it is a legal requirement that premises selling alcohol must be under the management of a designated premises supervisor, who must themselves hold a personal licence to sell alcohol;
- 3) that the premises are small; even small premises can contribute to crime, disorder and nuisance

Where an exception is made, the licensing committee may consider attaching specific conditions to the relevant authorisation requiring the use of door supervisors to monitor and control access to the premises and assist with dispersal, to install and maintain an electronic identification entry system which meets the reasonable requirements of Hertfordshire Constabulary, to make a monetary contribution to the town centre taxi marshal scheme (or such a replacement scheme which may be introduced to assist in the dispersal of customers from the town centre) and that the premises will actively participate in the town centre Pubwatch scheme and/or the Pubwatch radio scheme (or such a replacement scheme which may be introduced to assist in communication between venues).

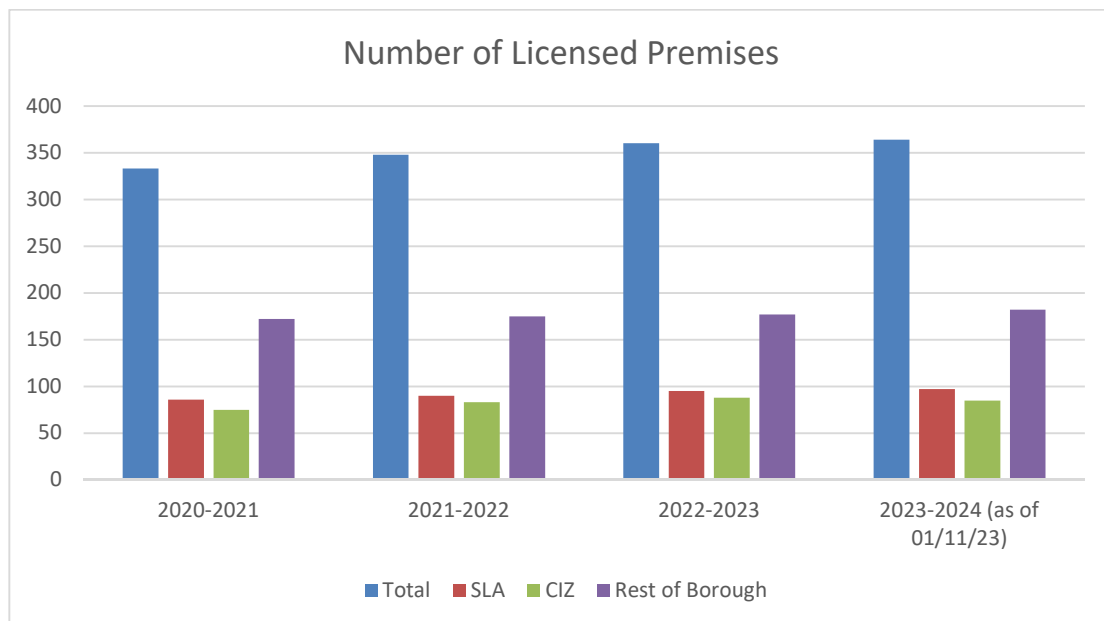
Cumulative Impact Assessment Data

Background Data

As of 1 November 2023, there were 364 authorisations issued by Watford Borough Council under the Licensing Act 2003. There were 348 premises licences and 16 club premises certificates.

The majority of licensed premises are located within the Central ward of the Borough, which covers the town centre, with 158 premises being located within this ward, consisting of 156 premises licences and 2 club premises certificates.

The following graph shows the distribution of authorisations between the cumulative impact zone (CIZ), the council's sensitive licensing areas (SLA), both of which were as detailed within the council's Statement of Licensing Policy 2023-2028, and the rest of the Borough. It has been decided to compare the figures between the two policy areas simply for the ease of comparison.



As of 01/11/2023 85 authorisations were in force within the cumulative impact zone, 97 authorisations were in force within the council’s sensitive licensed areas, and 182 authorisations were in force in the rest of the borough. The figures have remained relatively similar over the reporting period, with no significant increases or decreases in figures although the overall trend is an increase in licensed premises.

Most data has been gathered for the financial years of 2021-2022 to 2023-2024 (up to 01/11/2023). This is to allow for comparison between different sets of data, and to identify any trends. It should be noted that the council’s Statement of Licensing Policy 2023-2028 took effect from November 2023.

Data supplied by Hertfordshire Constabulary

Data was supplied by Hertfordshire constabulary with regards to crime statistics. The police data relates to the period of 01/04/2021 and 01/04/2023. The Police refer to this area as CC1 Central Ward with regards to recording locations of crimes and offences.

In this period, 7433 offences were committed within the ward between the dates specified. It is noted that there was an increase in offences on the previous two years, although this was to be expected due to the impact of the pandemic on the night-time economy. This data is presented within the graph below. The impact of the pandemic can clearly be seen in the decrease of the number of offences for 2020 when lockdown started through to 2021 when restrictions were started to be lifted. Increases can be noted in 2020 when restrictions were first relaxed but this fell again when restrictions were implemented again after the summer. The graph does show that in general crimes for the years shown are similar and clustered around 300 crimes per month, demonstrating that although variances can be recorded month by month, there is an overall consistency in the number of offences year on year.

Offence numbers between 01/01/2021 and 01/04/2023 and breakdown of offence types

Between 01/01/2021 and 01/04/2023, there were 7433 recorded offences within Central ward CC1 beat code.

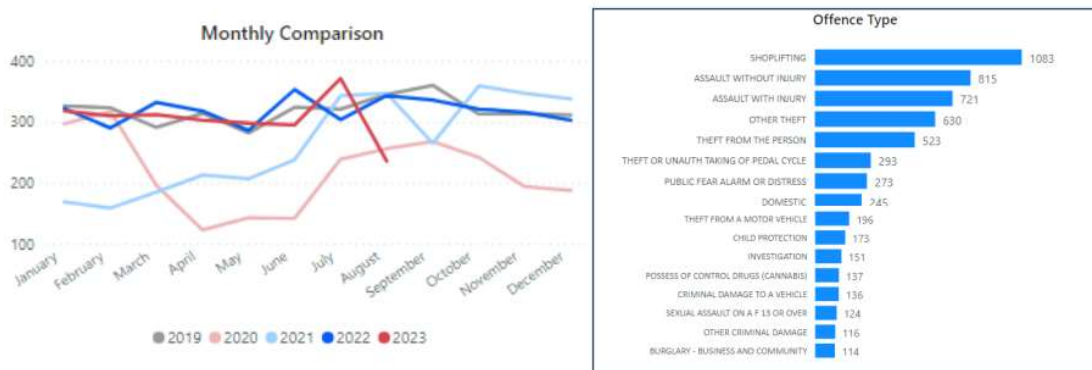


Table 1 – Number of offences per offence category (types with lower totals have been excluded)

As can be seen by table 1, offences of theft and assault or violence against the person offences accounted for most offences. Although not all offences are shown and offences with lower

totals have been excluded from the graphs, theft (37.6%) and violence against the person (23.8%) offences accounted for over 61.4% of the offences in this ward.

The police advise that there were no prevalent days or times noted with regards to the offences of theft and violence against the person, with the exception of alcohol-related offences as detailed later, although it is noted that the small hours of Saturday and Sunday (midnight to 04:00) generally see an increase in incidents. This is the period when most licensed premises within the town centre stop serving alcohol and close, pushing customers on to the streets to disperse from the town centre.

There were 601 offences recorded as being alcohol-related. For the purpose of this data collection, alcohol-related offences refer to where the offenders and / or victims have been noted on police systems as having been intoxicated. Alcohol-related offences mostly take place between 00:00 and 04:00 Saturday and Sunday, as noted earlier.

Street	Count
The Parade, High Street	114
The Parade	83
High Street	69
The Parade High Street	58
Market Street	32
Albert Road South	29
Clarendon Road	18
Station Road	17
Charter Place	13
Church Street	13
Lower High Street	11

Table 2 – list of streets which have experienced 10 or more offences.

Street Name
The Parade High Street **
Market Street
Albert Road South
Clarendon Road
Queens Road
Wellstones
Church Street
George Street
New Street
King Street

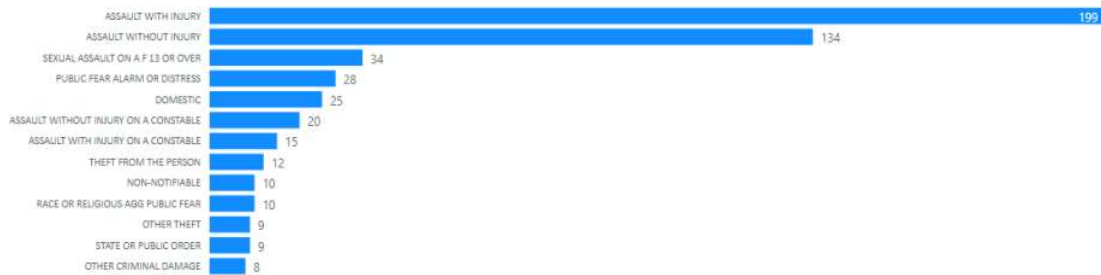
Table 3 – Streets of interest

As can be seen by table 2, The Parade and the High Street saw the most recorded alcohol-related offences. The police acknowledge that this is to be expected due to the high volume of people congregating in the area in comparison to other areas of the Borough, and the availability of alcohol within the vicinity. Over 50% of alcohol-related offences occur within The Parade, and it is therefore appropriate that focus is centred on this location. For the purpose of this data, the Police do note that due to how data is recorded 'The Parade' features in three different ways as can be seen in the table. When combined (identified by **), there are 255 offences recorded within The Parade, making this the top street for alcohol-related crime and a key street for the Police. The High Street also has more than double the number of recorded offences when compared to the next road, Market Street, in this table.

Streets of interest, as identified by table 3, are streets which are subject to specific focus from the police due to levels of crime within the area or local concerns. It is noted that The Parade and High Street appear to be justified as a location of concern.

The majority of these alcohol-related offences were classified as violence against the person, with assault with injury the most common offence. This shows that there is high chance of someone being assaulted by someone who is intoxicated, or where the victim is intoxicated, and are more likely to be a victim of such crime than other offences.

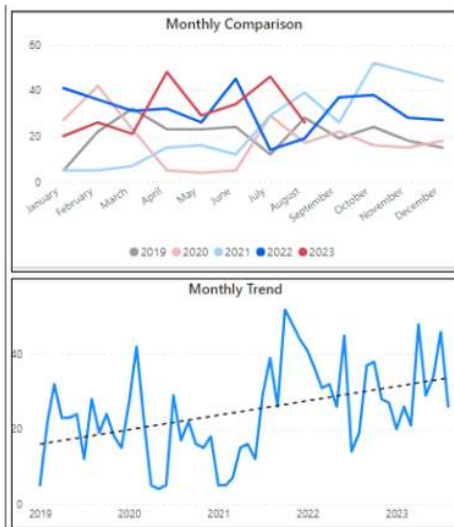
Alcohol Related



The Parade is singled out for special attention. The police data accounted for 36 licensed premises within The Parade with 159 licensed premises within the whole ward (the Police ward being slightly larger than the Central council ward). The licensing authority recorded 41 premises being licensed within The Parade as of 01/04/2023. This discrepancy from the actual number of licensed premises issued by the council can be explained by the fact that the police are notified by the licensing authority when licences are granted and keep their own records, and this data may not be as accurate as the records held by the licensing authority through human error and not necessarily deliberate intent. The council also have issued one shadow premises licence, which is a licence which is not currently being used but the premises to which it relates is licensed by another premises licence which is being utilised.

Of the total 7433 offences committed within Central ward CC1, 385 (5%) of all offences occurred within licensed premises on The Parade. When compared to all licensed premises within the Police’s Central ward, 53% of all offences at licensed premises occurred within The Parade, despite only accounting for just over a quarter of all premises within the whole ward. This shows that these premises are associated with a disproportionate number of offences.

The figures do show a general upwards trend in offences reported, not only when compared to 2020 and 2021 which were affected by the pandemic but also to 2019 being the year before the pandemic.

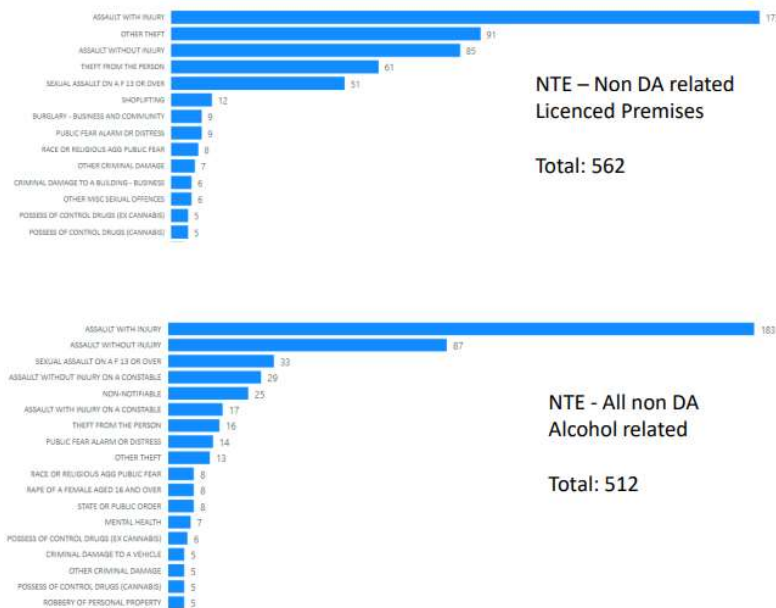


Offence Type	2019	2020	2021	2022	2023	Total
Theft from shops and stalls	47	68	55	67	71	308
Assault with Injury - Assault occasioning actual bodily harm	48	15	53	56	33	205
Assault without Injury - Common assault and battery	40	26	40	56	38	200
Theft if not classified elsewhere	30	32	36	41	29	168
Theft from the person of another	15	17	25	31	10	98
Making off without payment	8	17	9	13	15	62
Sexual assault on a female	3	1	13	29	9	55
Assault with Injury - Administering poison with intent to injure or annoy		1	11	19	3	34
Burglary - Business And Community	6	5	6	6	8	31
Other criminal damage, other (Under £5,000)	3	5	5	4	3	20
Causing intentional harassment, alarm or distress	3	2	7	4	3	19
Other criminal damage to a building - business and community (Under £5,000)		1	4	3	7	15
Attempted - Theft from shops and stalls	5	3	1	3		12
Fear or provocation of violence	1	7	1	1	2	12
Having possession of a controlled drug - Class B - Cannabis	6	1		2	1	10
Racially or religiously aggravated intentional harassment, alarm or distress	2		1	3	4	10

Table 5 – Number of offences per offence category.

The police have provided a breakdown of alcohol-related offences between the hours of 22:00 and 04:00 for the whole ward and also for licensed premises which operate during the night-time economy (NTE). Please note that this data explicitly records domestic assault (DA) reports.

Non-DA NTE - all Alcohol-related offences by type compared to NTE Licenced Premises offences between 22:00-04:00



Assault with injury made up the largest single category of non-DA offences at licenced premises, equating to 30.1%. In addition, another 85 offences occurred where no injury was caused. Temporal analysis reveals that the top time for offences at licenced premises where DA is excluded is 01:00 to 02:00 on **Sunday mornings**, but that hot times span Saturday Midnight to 03:00, Saturday 23:00 to midnight and Sunday midnight to 04:00*.

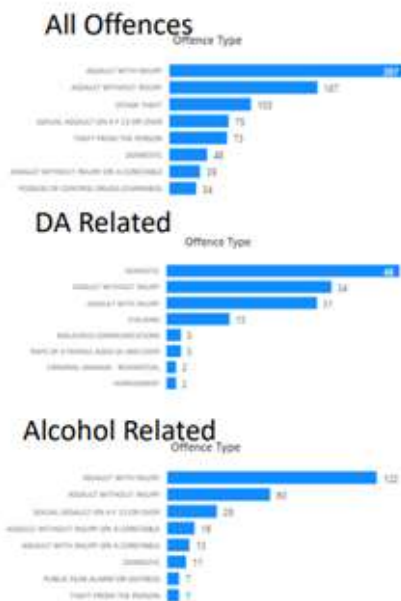
For Alcohol related non-DA, **Assault with injury** is again the top category, and takes a slightly higher proportion of the offence total (35.7%). Temporal analysis reveals that the top time for alcohol related offences at where DA is excluded is also 01:00 to 02:00 on **Sunday mornings**, but that hot times span Saturday Midnight to 03:00 and Sunday midnight to 04:00.*

(*NB the temporal analysis may be somewhat distorted by the Athena default time being 00:00). This marks a shift from previous data when Saturday stood out more than Sunday).

The data shows that assault with injury is unfortunately the most common offence committed within licensed premises during the night-time economy. The data recorded for non-licensed premises has a minimal impact upon the figures, demonstrating the link between licensed premises and high incidents of crime and the intensity of the number of offences associated with licensed premises.

A breakdown of offences and premises type has also been provided. This shows that reports for incidents out in the open street was the most popular location for recording data highlighting the cumulative impact of the number of people in the area and not being linked to any one particular premises, with public houses, bars and night clubs as the second most popular.

NTE offences (top 8 per category) & By Premises Type



NTE CC1 Location by Type	
All Offences Premises Type	Count
	1020
Street / Road	152
Public House / Bar / Night Club	86
Flat/Apartment	42
Hotel / B&B / Guest house	16
Shop / Store / Supermarket	14
Car Park	8
Cafe / Restaurant	7
Outside	6
Petrol / Filling Station	6
Ambulance / Fire station / Police Station	3
Cemetery / Crematorium	3
Social Club	3
Path	2
Taxi Rank	2
Hall / Community centre	1
House - Bungalow	1
Park / Gardens	1
School	1
Sports Club	1

Alcohol Related Premises Type	Count
	236
Street / Road	41
Public House / Bar / Night Club	27
Hotel / B&B / Guest house	5
Flat/Apartment	3
Shop / Store / Supermarket	3
Cemetery / Crematorium	1

DA Related Premises Type	Count
	118
Street / Road	12
Flat/Apartment	10
Public House / Bar / Night Club	3
Cemetery / Crematorium	1
Hotel / B&B / Guest house	1
Petrol / Filling Station	1

Tables 9-11 NTE offences by location type

Where a location type is recorded, 'Street / Road' offences is consistently the top location, however for both 'all offences', and Alcohol related offences, but NOT DA, Public House / Bar / Night Club is the second most common, whilst for DA it is a flat of apartment. Of note is that for the majority of offence no venue type is recorded. Of 1,375 offences that fall within the NTE time frame, Assault with or without injury combine to be the highest scoring throughout.

In respect of the locations of reports, a geographic map showing the cluster of alcohol-related offences. The Parade stands out as the location with the most reports with a clear cluster of offences recorded down the spine of the town centre covering The Parade and the High Street, and a second map has been provided to show a more detailed breakdown of complaints within The Parade.

NTE Top Streets (Excluding DA)

Top NTE streets when

Street	Count
The Parade, High Street	72
The Parade	68
The Parade High Street	41
Albert Road South	25
High Street	19
Market Street	8
Station Road	8

Table 12 – list of streets which have experienced 8 or more NTE Alcohol related offences.

NTE Offences



The Parade High Street features a large proportion of non-DA alcohol-related offences (just over 63%) between 22:00-04:00. This was the same situation noted at the time of the last report. This is to be expected considering the high volumes of people congregating in this area and the number of licensed premises here at it remains prudent to focus attention here.

Of the 41 licensed premises within The Parade as of 01/04/2023, 36 allowed the sale of alcohol. Of the 41 licensed premises within the High Street in the same period, 37 allowed the sale of alcohol. The breakdown of the number of premises by licensable activity are included in the table below. This data is supplied by the licensing authority.

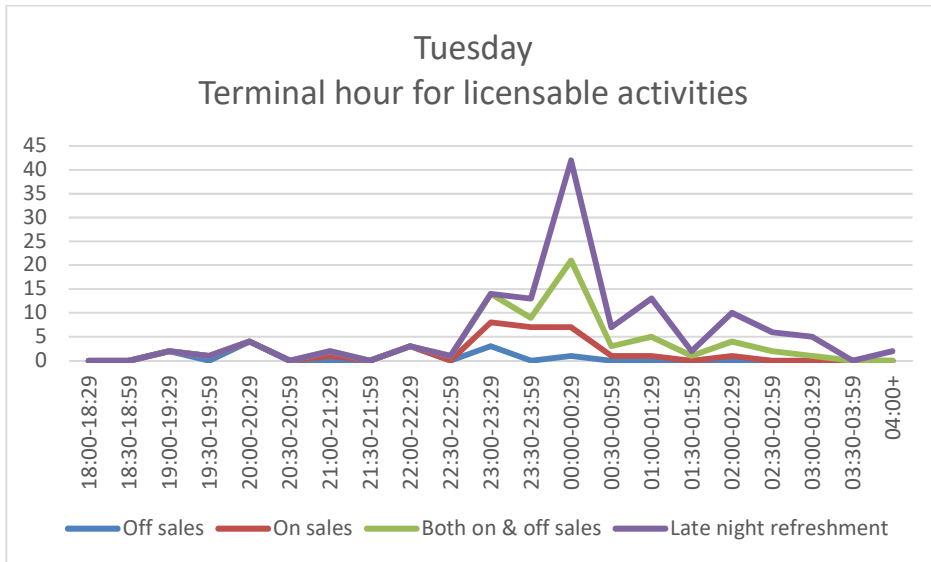
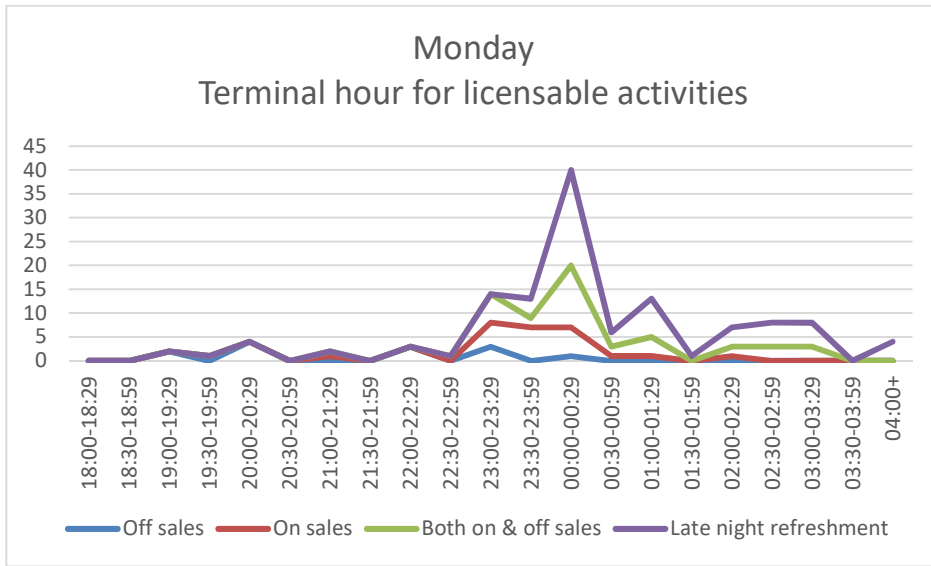
Licensable activity	Number of premises	
	The Parade	High Street
Supply of alcohol (consumption on premises)	13	10
Supply of alcohol (consumption off premises)	7	6
Supply of alcohol (consumption both on and off premises)	16	21
Late night refreshment only*	4	3
Regulated entertainment only	0	0

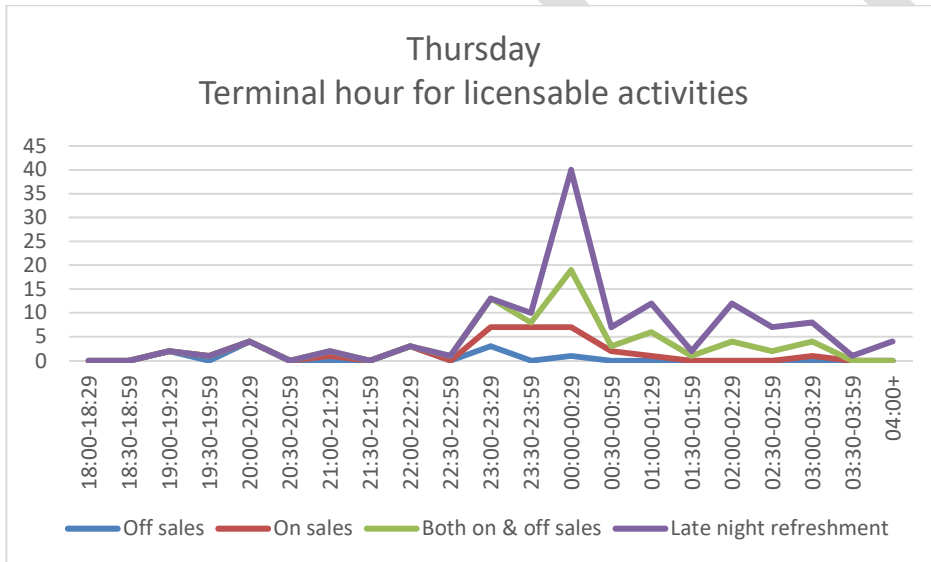
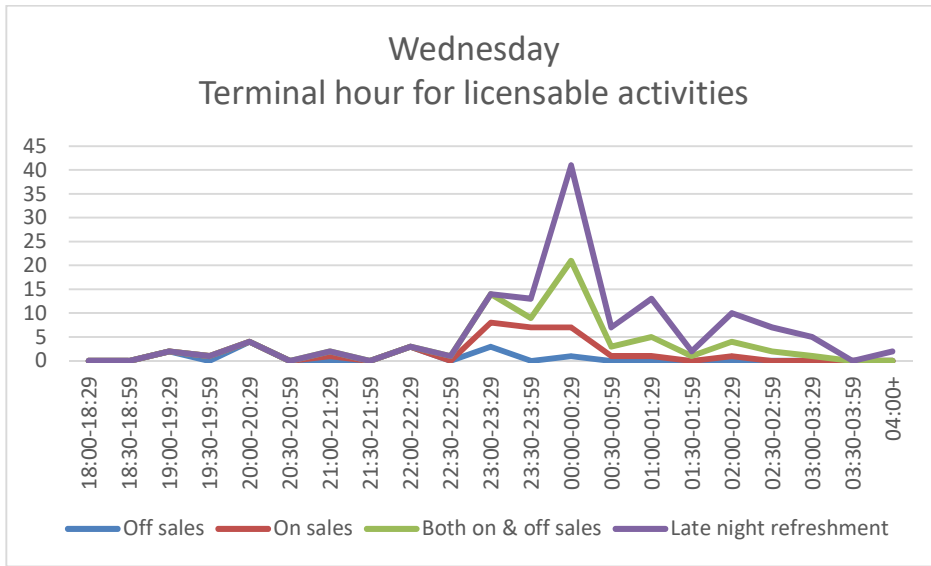
** On both The Parade and the High Street one premises is licensed for late night refreshment and regulated entertainment, explaining the difference between these figures and the total number of premises*

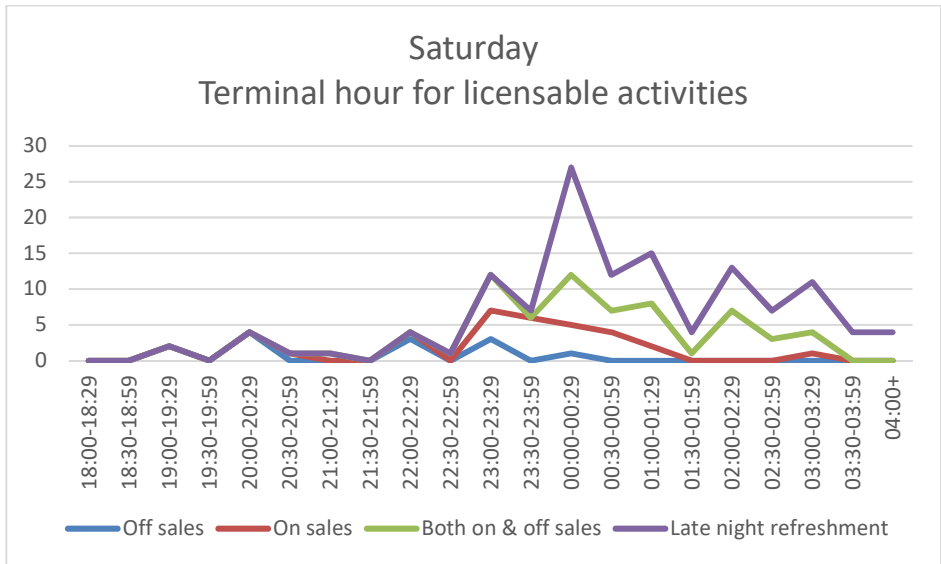
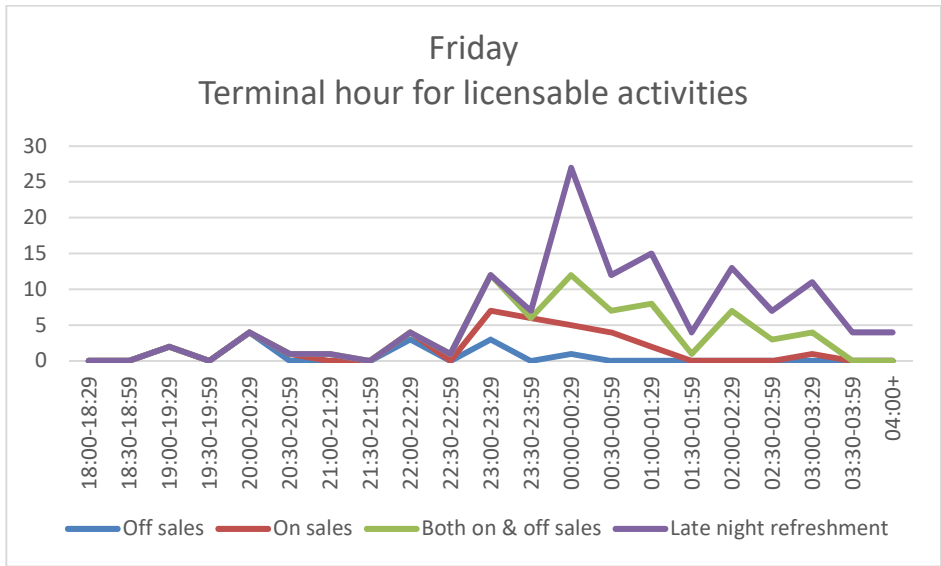
It is acknowledged that not all premises which sell alcohol only sell alcohol as a licensable activity. The full breakdown of the number of premises offering licensable activities, and which activities they can offer, is included in the following table. Again, this data is supplied by the licensing authority.

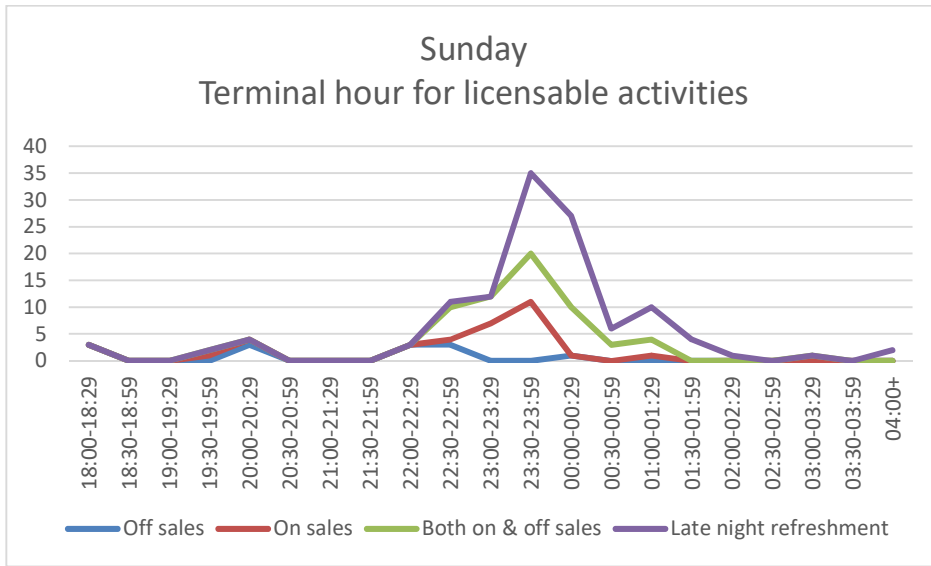
Licensable Activities	Number of Premises	
	The Parade	High Street
Supply of Alcohol (both on- and off-sales premises) only	1	3
Late night refreshment only	4	3
Supply of Alcohol (off-sales) only	6	6
Supply of Alcohol (on-sales) only	2	2
Supply of Alcohol (both on- and off-sales) & Late night refreshment	0	8
Supply of Alcohol (both on- and off-sales) & Regulated entertainment	0	2
Supply of Alcohol (off-sales) & Regulated entertainment	1	0
Supply of Alcohol (on-sales) & Late night refreshment	1	3
Supply of Alcohol (on-sales) & Regulated entertainment	2	1
Regulated entertainment & Late night refreshment	1	1
Supply of Alcohol (both on- and off-sales), Regulated entertainment & Late night refreshment	16	8
Supply of Alcohol (on-sales), Regulated entertainment & Late night refreshment	8	4

The terminal hours for these licensable activities extend later into the night closer to the weekend. The following graphs show the distribution of terminal hours for these licences for each day of the week, with noticeable peaks of later hours for alcohol sales on Thursdays, Fridays and Saturdays.









The majority of premises trade beyond 22:00, which appears to justify the police’s approach of classifying these premises as trading in the night-time economy. The police have advised that offence numbers peak between midnight and 03:00 on Saturday morning and midnight to 04:00 on Sunday morning. As can be seen from these graphs, this is when the majority of terminal hours for licensable activities occur and when customers should start vacating premises.

DRAFT