



**WATFORD  
BOROUGH  
COUNCIL**

# **LICENSING COMMITTEE**

**7 March 2024**

**7.00 pm**

**Town Hall, Watford**

**Contact**

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**Publication date: Wednesday, 28 February 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 MBE, 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 11 January 2024 to be submitted and signed.

**4. Licensing Sub-Committee minutes and update**

The following Licensing Sub-Committee hearings have taken place since the last meeting of the Licensing Committee:

- Diamonds and Strings (9 June 2023) Councillors Saffery (Chair), Nembhard and Osborn.
- Dunnings (21 July 2023) Councillors Wenham (Chair), Grimston and Saffery.
- RS Food & Wine (3 August 2023) Councillors Wenham (Chair), Devonish and Saffery
- Expo Cash & Carry (5 October 2023) Councillors Wenham (Chair) Nembhard and Saffery.
- Valea Prahovei (19 October 2023) Councillors Wenham (Chair), Saffery and Feldman.
- Tim Hortons (27 November 2023) Councillors Wenham (Chair), Saffery and Saunders.
- RS Food & Wine (4 January 2024) Councillors Saffery (Chair), Devonish and Grimston
- Papa John's (19 January 2024) Councillors Wenham (Chair), Osborn and Saffery.
- Woody Express (6 February 2024) Councillors Wenham (Chair), Devonish and Saffery.

**5. Review of Cumulative Impact Assessment under Statement of Licensing Policy  
2023-2028 (Pages 4 - 52)**

Report of Environmental Health Manager (Business)

# Agenda Item 5

Part A

**Report to:** Licensing Committee

**Date of meeting:** Thursday, 7 March 2024

**Report author:** Environmental Health Manager (Business)

**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. At its meeting on 11 January 2024 the Licensing Committee agreed to consult on renewing the Cumulative Impact Assessment and Cumulative Impact Policy.
- 1.4 This report details the results of the consultation and any amendments that need to be made as a result of the consultation.

## 2.0 Risks

### 2.1

<b>Nature of risk</b>	<b>Consequence</b>	<b>Suggested Control Measures</b>	<b>Response</b> (treat, tolerate, terminate or transfer)	<b>Risk Rating</b> (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 if the policy is to be continued		
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 having had regard to the consultation responses set out in appendix 2 the Committee recommends that the new Cumulative Impact Assessment, attached at appendix 1, be adopted .

**Further information:**

Richard Brown, Environmental Health Manager (Business)  
[richard.brown@watford.gov.uk](mailto:richard.brown@watford.gov.uk)

**Report approved by: Justine Hoy, Associate Director**

#### **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 At its meeting of 11 January 2024 the Committee agreed to consult on a draft Cumulative Impact Assessment which would see the Cumulative Impact Policy for the High Street and The Parade renewed and continuing until April 2027.
- 4.4 This reports details the consultation and the results of the consultation on the proposed Cumulative Impact Assessment.

#### **5.0 Consultation**

- 5.1 The consultation ran from 18 January 2024 to 16 February 2024. The justification for which parties were to be consulted was contained in the report presented to the Licensing Committee on 11 January 2024.
- 5.2 The following parties were consulted directly by email:
- Hertfordshire Constabulary
  - Public Health at Hertfordshire County Council
  - Trading Standards at Hertfordshire County Council
  - Hertfordshire Safeguarding Children Partnership
  - Home Office Immigration Enforcement
  - Development Management at Watford Borough Council
  - Housing & Wellbeing at Watford Borough Council
  - Watford Community Safety Partnership
  - Watford Town Centre Bid
  - All local ward Councillors
  - 17 residents' and community associations within the Borough
- 5.3 The following parties were consulted directly by letter:

- 126 premises and premises licence holders \*
  - 42 agents who have represented premises licence holders in submitting applications over the previous 3 years
  - 366 residents living within the Cumulative Impact Policy areas of the High Street and The Parade
  - 4 residents' and community associations within the Borough (where no email contact was made available)
- \* All licensed premises and premises licence holders within the High Street and The Parade were contacted, but it should be noted that some licence holders hold more than one licence so were only contacted once. No club premises certificate holders were consulted because there are no club premises certificates in force within the policy area.

5.4 The consultation was advertised on the council's licensing webpages during the consultation period and a press release was arranged for 18 January 2024. The webpage linked to a survey which asked for views on the proposed policy, but all consultees were also invited to contact the licensing team by email or in writing and not only through the survey.

## **6.0 Consultation responses**

6.1 The survey responses are attached at appendix 2. Our last consultation in 2023 returned 3 responses. This consultation returned 32 responses. The responses are broadly in support of continuing the Cumulative Impact Assessment, although some specific comments were received upon which officers wish to comment. No responses from businesses, licence holders, residents, or any party representing these parties, were received by letter or by email.

6.2 Q1: Do you agree with the analysis of the Police data contained within the draft Cumulative Impact Assessment?

The majority of respondents voted yes to this question.

Specific comments made include -

"It has not taken into account the views of ordinary residents. The towns bars and pubs are closing so fast it will impact jobs and ultimately hurt the town centre longer term."

"Yes and it's important to get the right mix of a vibrant night-time economy and monitoring alcohol-related offences."

- 6.3 Q2: Do you agree with the proposed approach to dealing with licensing applications in the town centre, including suggested conditions for premises operating after 10pm and the list of premises which would be exempt from this policy?

The majority of respondents voted yes to this question.

Specific comments made include –

“Don’t tar all citizens with the same brush. Nothing wrong with eating and drinking after 10pm or into the early hours.”

“It’s scary to go to the city centre sometimes.”

- 6.4 Q3: Do you think that the area to which the proposed LP3 (Cumulative Impact Policy) applies is correct and supported by the Police evidence?

The majority of respondents voted yes to this question.

Specific comments made include –

“I live on the Queens Road. I think the area for this policy should be bigger than the High Stand the Parade.”

“Yes and those areas make sense given the businesses in those areas. You would expect say Clarendon Road to have less.”

- 6.5 Q4: Do you have any additional comments to make with regards to the policy which applies to the town centre that you would like the council to consider?

Specific comments made include –

“As the number of homes built in and around this area are increasing I believe it is incredibly vital to ensure all is being done to lower the crime rate around the Parade and the high st.”

“While not having been a victim of crime within these areas it feels very uncomfortable walking down the Parade mid to late evening and also in St Albans Road near the pubs and Kentucky.”

## **7.0 Responsible authority responses**

- 7.1 It is noted that Trading Standards replied through the consultation survey (confirmed through the email address, name, and postal address provided as part of the respondents personal details) and did not have any specific comments to make.



7.2 The Police were consulted on the Cumulative Impact Assessment as a matter of course since they are a responsible authority, but it is also noted that the evidence for the policy relies upon Police crime statistics.

7.3 The Watford Police responded:-

*We would still encourage having the Cumulative Impact Policy because of the data Police recently supplied to you. That data is sourced from crime reporting and recording, and calls to Police, so it is accurate. The High Street and The Parade are a couple of our hotspot areas for alcohol related ASB, and the areas attribute to the increase in crime and disorder, so we wouldn't want it to be removed. Since Pryzm Nightclub has only recently closed, we do not currently know what long-term effect or implications this will have on the NTE. However, it is clear to Police that in the past 6 weeks since it's closure, there has still been a degree of NTE alcohol related crime and ASB reported and recorded. The timings of this consultation have come at a time when one of our biggest licensed premises has closed, so leaves us withing this unknown entity, and to remove the CIP at this time would be detrimental to the four Licensing Objectives for Crime & Disorder, Public Safety, Public Nuisance.'*

7.4 The Watford Senior Environmental Health Officer responded:-

*After reviewing the above policy on behalf of environmental health, a responsible authority we support its retention.*

*Although there is no explicit correlation between the number of licenced premises in the town centre and the level of complaints from residents, owing to the introduction of high-density residential blocks/ conversions through permitted development, the town centre is becoming more domestic in nature. Therefore, retaining this policy will help promote the prevention of public nuisance licensing objective as the town centre continues to go through this process.*

## **8.0 Statement of Licensing Policy**

8.1 The Cumulative Impact Assessment sets out the evidence and the justification for the Cumulative Impact Policy, with the policy sitting within the statement of licensing policy. The council's current statement of licensing policy was adopted by the council in November 2023.

8.2 With the consultation responses broadly supporting the renewal and continuation of the Cumulative Impact Policy, with no proposed amendments to the policy area or premises types, there is no requirement to amend the council's statement of licensing policy. Approving the Cumulative Impact Assessment confirms that the Cumulative Impact Policy remains in place which is the position of the current statement of licensing principles.

## **9.0 Implications**

### **9.1 Financial**

9.2 The Chief Finance Officer comments that there are no financial implications arising directly from this report.

### **9.3 Legal Issues (Monitoring Officer)**

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

### **9.5 Equalities, Human Rights and Data Protection**

9.6 Under s149 (1) of the Equality Act the council must have due regard, in the exercise of its functions, to the need to –

- eliminate discrimination, harassment, victimisation and any other conduct prohibited by the Act
- advance equality of opportunity between persons who share relevant protected characteristics and persons who do not share them
- foster good relations between persons who share relevant protected characteristics and persons who do not share them.

9.7 As this is a proposal to continue an existing policy, an equalities impact analysis has been undertaken. The analysis is attached as appendix 3 to this report. The main conclusions of that analysis are that there are no significant impacts on any one particular group from the implementation of this policy. This is the same result as the previous equalities impact analysis, but has been revised to take into account up to date information. The application process is set out in legislation, including how applications are to be determined, and businesses or applicants who wish to be considered as an exemption to policy have a legal right to represent themselves, or be represented, at a licensing hearing where a hearing is required.

## **10.0 Crime and Disorder**

10.1 Section 17 of the Crime and Disorder Act 1998 requires the council 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. The prevention of crime and disorder is one of four licensing objectives that guides all licensing decisions, and which we must aim to address through policy and the implementation of the Licensing Act 2003. We have adopted a policy based on evidence from the Police with steps that we consider promote this licensing objective.

## 10.2

The evidence does not support any Cumulative Impact Zone expansion into other Streets such as Queens Road as per 6.4 of this report. The Community Safety Manager commented that he shares the Police sentiment:

That while we have seen a reduction in ASB crime since the closure of Pryzam , it is, however, it is too early to make any request to change on the cumulative impact policy as we need to see if other businesses will (all be it) on a small scale 'step in to provide alternative entertainment within the NTE availing themselves of currently disused venues in the parade, thus the policy should stay in place to accommodate any such change.

## **Appendices**

Appendix 1 – Proposed cumulative impact assessment (2024-2027)

Appendix 2 – Survey responses

Appendix 3 – Equalities Impact Analysis

## **Background papers**

Consultation responses for the period 18/01/2024-16/02/2024

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

Cumulative Impact Assessment 2021-2024

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

**APPENDIX 1**



**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](mailto: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).

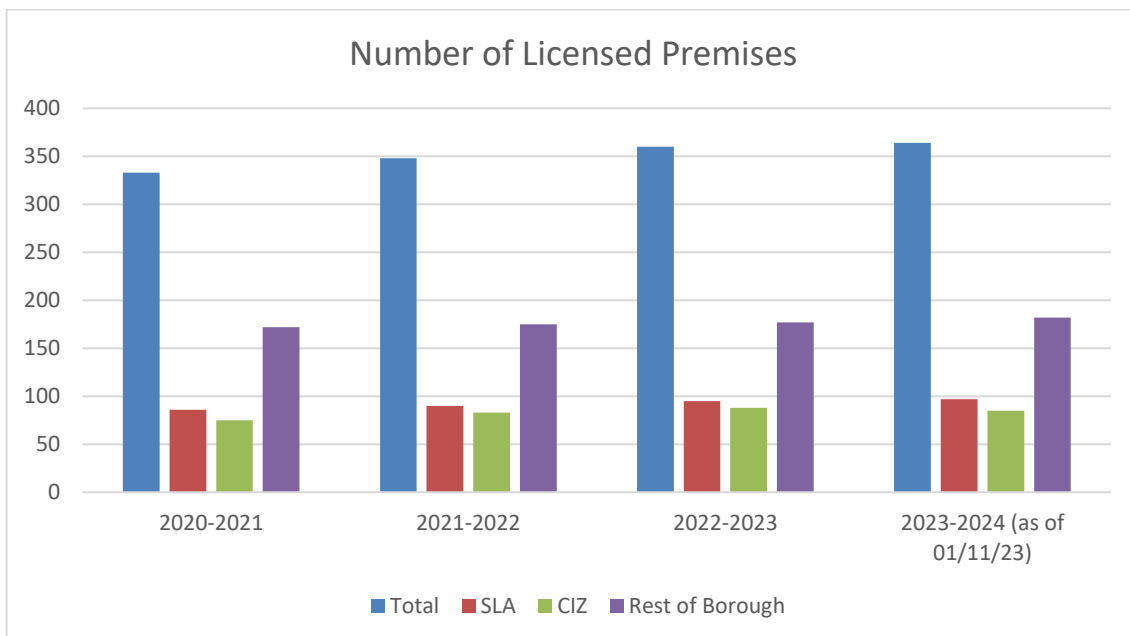
### Cumulative Impact Assessment Data

#### 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.

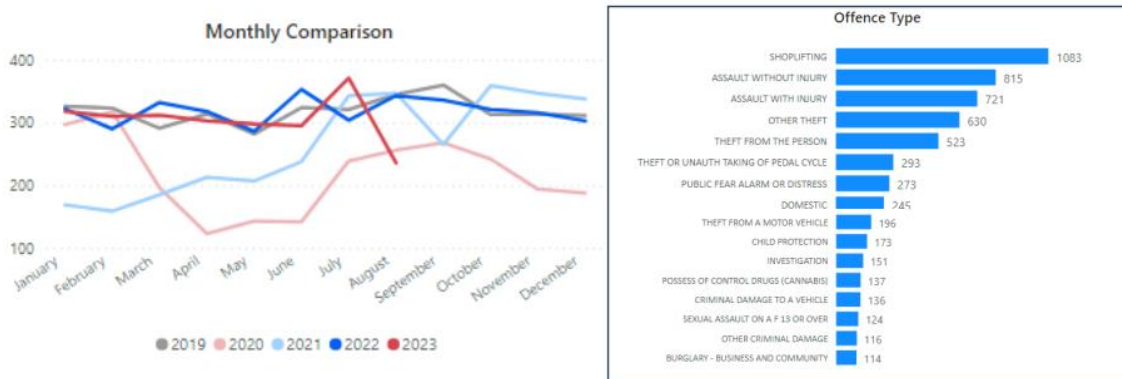


Table 1 – Number of offences per offence category (types with lower totals have been excluded)

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

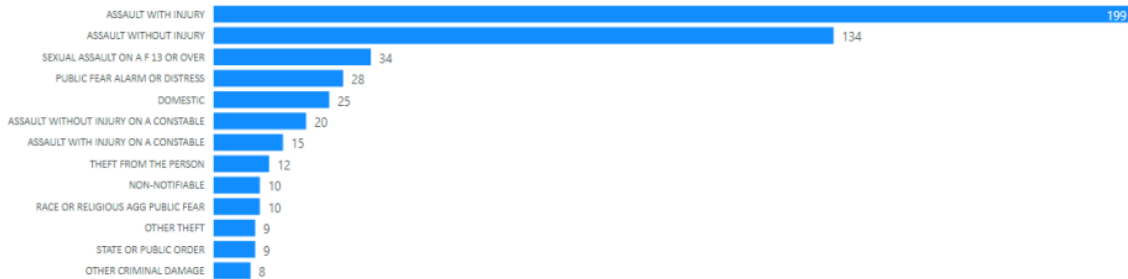
**Table 3** – Streets of interest

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.

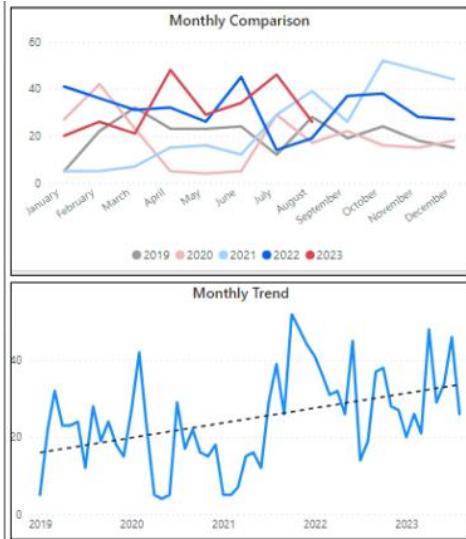
### Alcohol Related



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.

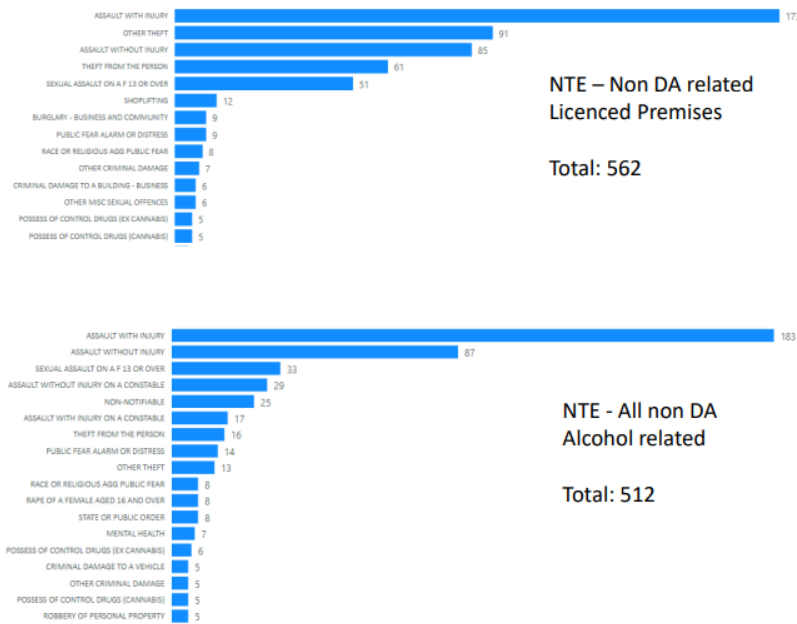


Offence Type	2019	2020	2021	2022	2023	Total
Theft from shops and stalls	47	68	55	67	71	308
Assault with Injury - Assault occasioning actual bodily harm	48	15	53	56	33	205
Assault without Injury - Common assault and battery	40	26	40	56	38	200
Theft if not classified elsewhere	30	32	36	41	29	168
Theft 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	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\*.

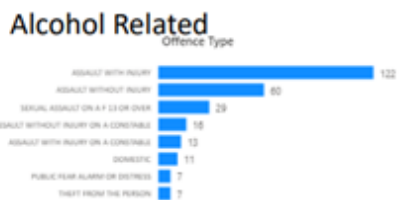
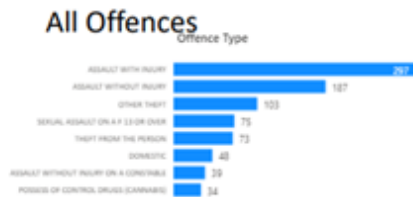
For Alcohol related non-DA, **Assault with injury** is again the top category, and takes a slightly higher proportion of the offence total (35.7%). Temporal analysis reveals that the top time for alcohol related offences at where DA is excluded is also 01:00 to 02:00 on **Sunday mornings**, but that 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 licenced premises during the night-time economy. The data recorded for non-licensed premises has a minimal impact upon the figures, demonstrating the link between licenced premises and high incidents of crime and the intensity of the number of offences associated with licenced 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		Alcohol Related	
All Offences	Count	Premises Type	Count
Street / Road	152	Street / Road	41
Public House / Bar / Night Club	86	Public House / Bar / Night Club	27
Flat/Apartment	42	Hotel / B&B / Guest house	5
Hotel / B&B / Guest house	16	Flat/Apartment	3
Shop / Store / Supermarket	14	Shop / Store / Supermarket	3
Car Park	8	Cemetery / Crematorium	1
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		
Parks / Gardens	1		
School	1		
Sports Club	1		

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.

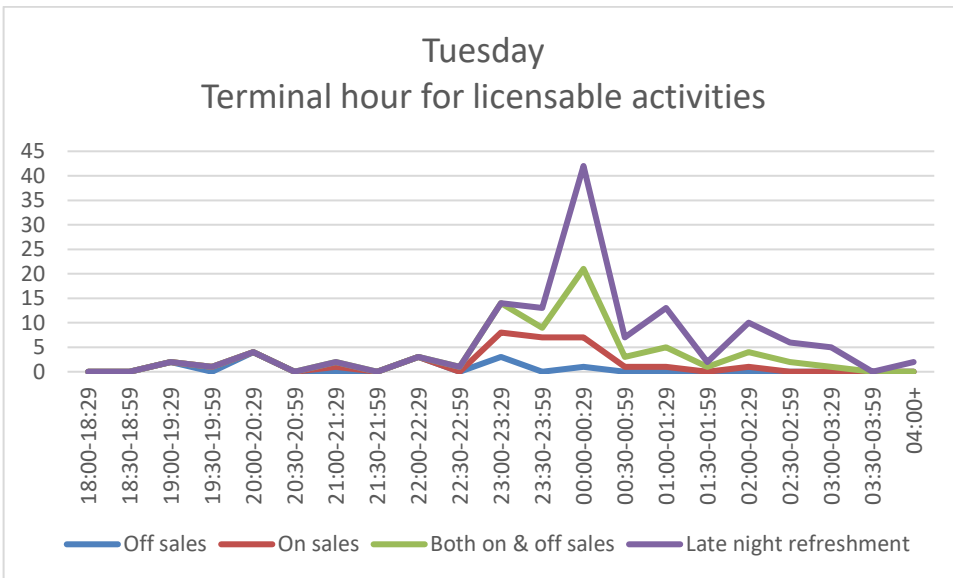
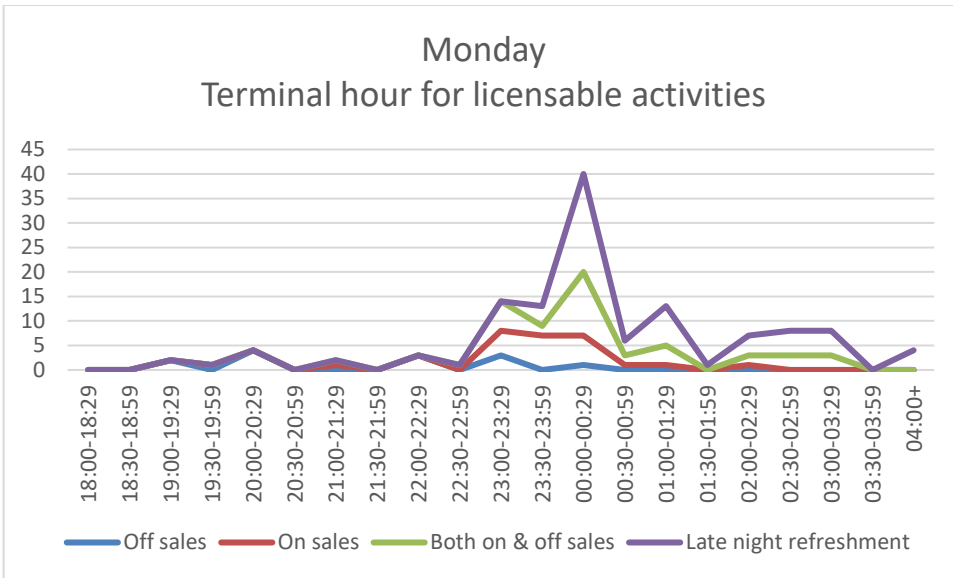
Licensable activity	Number of premises	
	The Parade	High Street
Supply of alcohol (consumption on premises)	13	10
Supply of alcohol (consumption off premises)	7	6
Supply of alcohol (consumption both on and off premises)	16	21
Late night refreshment only*	4	3
Regulated entertainment only	0	0

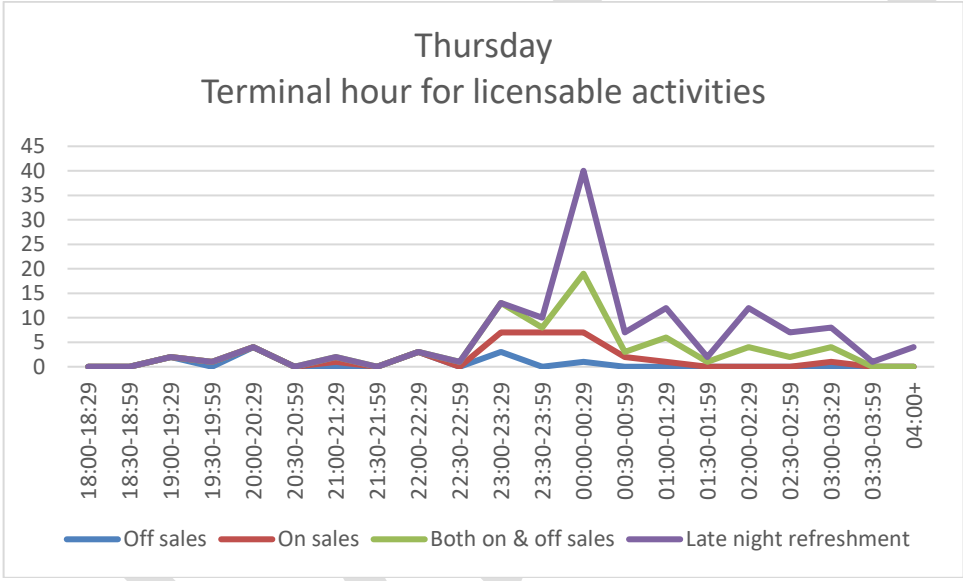
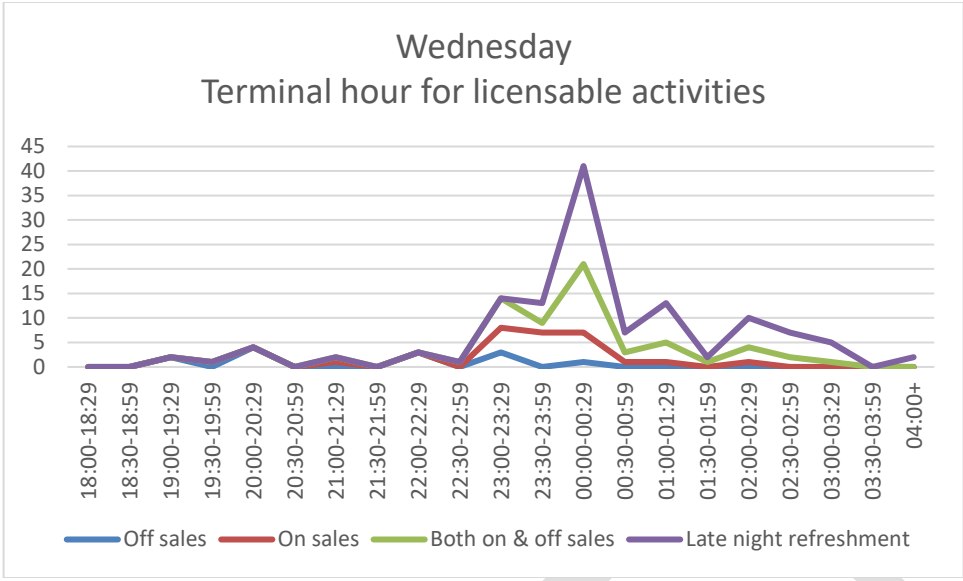
*\* On both The Parade and the High Street one premises is licensed for late night refreshment and regulated entertainment, explaining the difference between these figures and the total number of premises*

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.

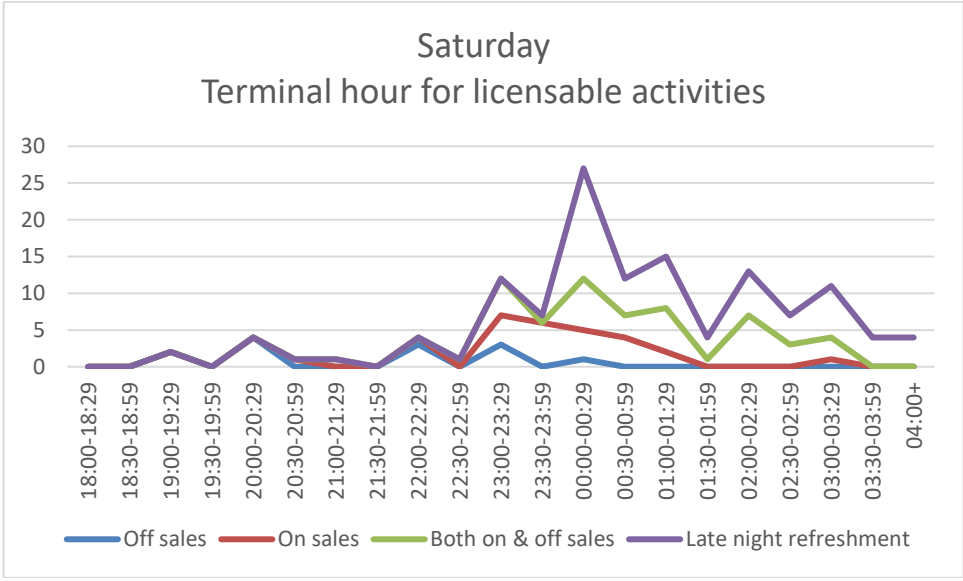
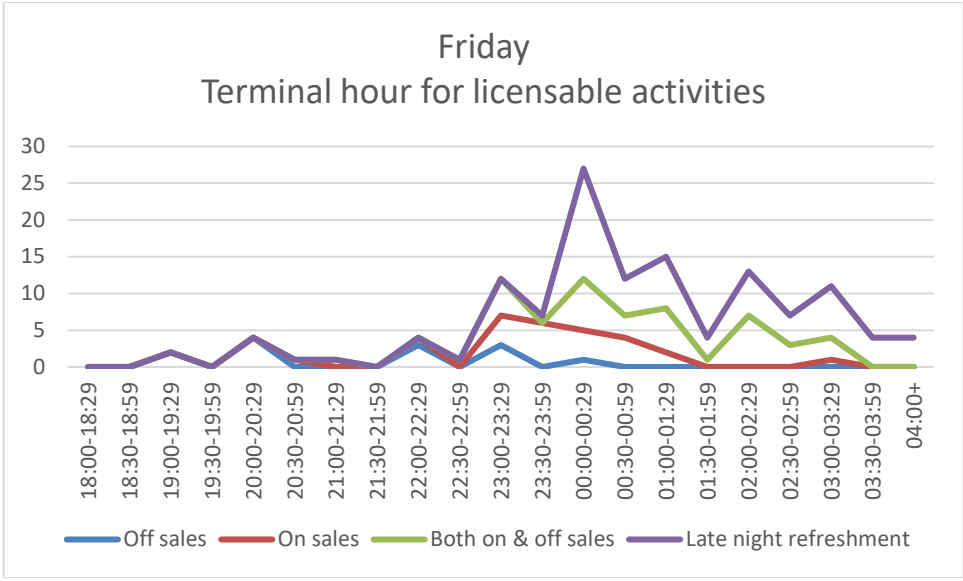
Licensable Activities	Number of Premises	
	The Parade	High Street
Supply of Alcohol (both on- and off-sales premises) only	1	3
Late night refreshment only	4	3
Supply of Alcohol (off-sales) only	6	6
Supply of Alcohol (on-sales) only	2	2
Supply of Alcohol (both on- and off-sales) & Late night refreshment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

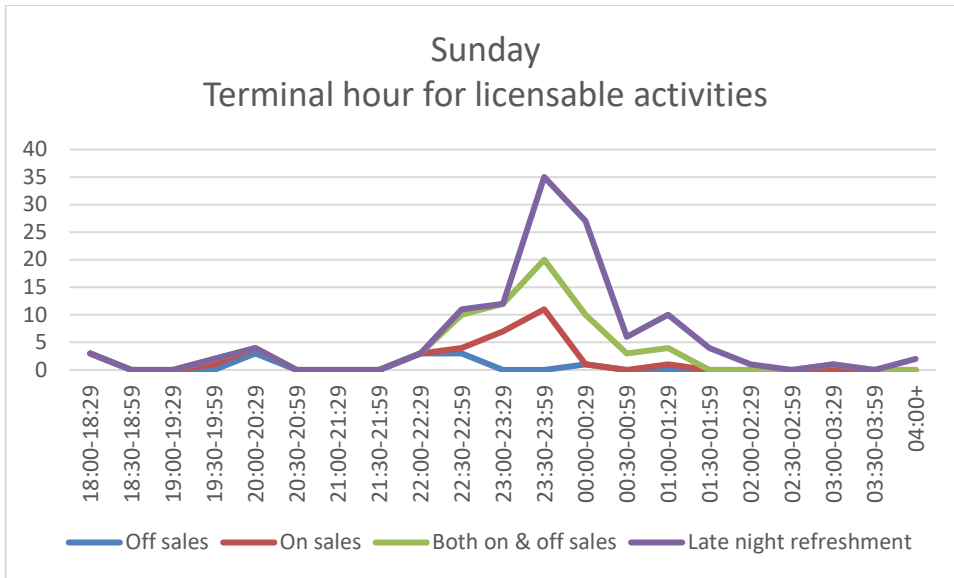
The terminal hours for these licensable activities extend later into the night closer to the weekend. The following graphs show the distribution of terminal hours for these licences for each day of the week, with noticeable peaks of later hours for alcohol sales on Thursdays, Fridays and Saturdays.









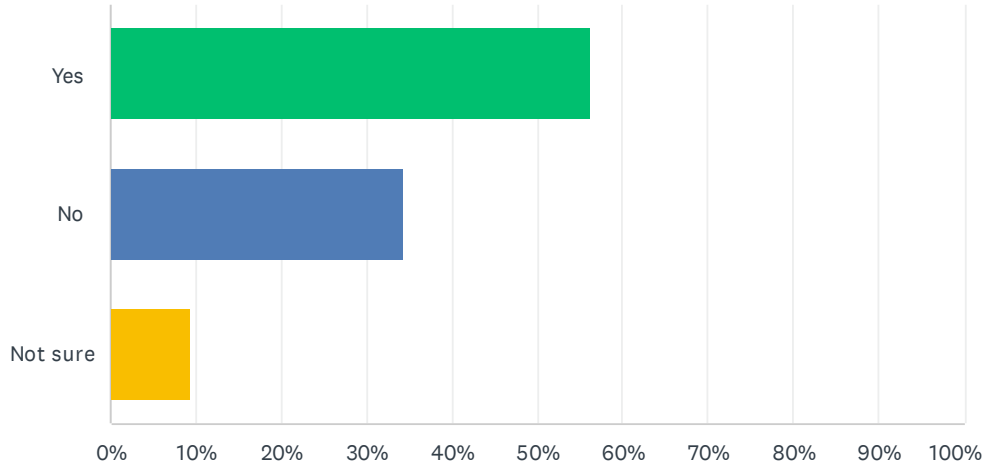


The majority of premises trade beyond 22:00, which appears to justify the police’s approach of classifying these premises as trading in the night-time economy. The police have advised that offence numbers peak between midnight and 03:00 on Saturday morning and midnight to 04:00 on Sunday morning. As 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

## Q1 Do you agree with the analysis of the Police data contained within the draft Cumulative Impact Assessment?

Answered: 32 Skipped: 0

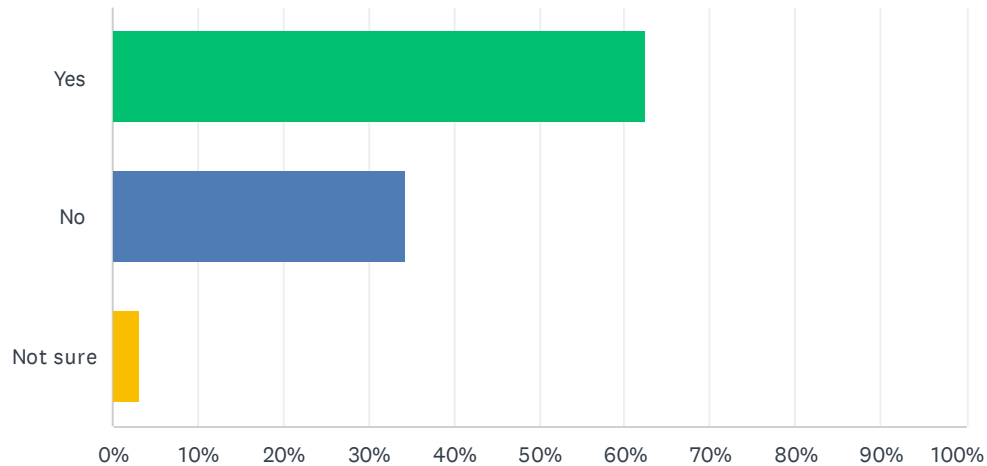


ANSWER CHOICES	RESPONSES	
Yes	56.25%	18
No	34.38%	11
Not sure	9.38%	3
<b>TOTAL</b>		<b>32</b>

#	PLEASE TELL US WHY	DATE
1	I have observed a significant increase in noise pollution during the nighttime, primarily stemming from clubs and bars in the vicinity. This surge in noise levels has been accompanied by a rise in altercations and criminal activities during the night, often exacerbated by alcohol consumption. It's important to note that not all incidents have been officially reported, suggesting that the true extent of the impact may be underestimated. This issue warrants attention and action to mitigate its adverse effects on public safety and well-being.	2/11/2024 4:06 PM
2	Biased against pubs which are social nessacary for the older generation in the day time.	1/31/2024 3:45 PM
3	Data can be manipulated to suit a specific view.	1/30/2024 10:07 PM
4	Drunk football fans early in the mornings	1/30/2024 6:06 PM
5	I believe there to be more alcohol-related offences in lesser patrol places.	1/26/2024 11:41 AM
6	In my opinion, you can prevent sales of alcohol, you can stop certain establishments selling alcohol, but it won't stop people nipping into Tesco or Sainsbury's to buy it before hitting the town....	1/26/2024 11:40 AM
7	Yes and it's important to get the right mix of a vibrant night-time economy and monitoring alcohol-related offences.	1/26/2024 10:52 AM
8	It has not taken into account the views of ordinary residents. The towns bars and pubs are closing so fast it will impact jobs and ultimately hurt the town centre longer term	1/25/2024 7:15 PM

## Q2 Do you agree with the proposed approach to dealing with licensing applications in the town centre, including suggested conditions for premises operating after 10pm and the list of premises which would be exempt from this policy?

Answered: 32 Skipped: 0



ANSWER CHOICES	RESPONSES
Yes	62.50% 20
No	34.38% 11
Not sure	3.13% 1
<b>TOTAL</b>	<b>32</b>

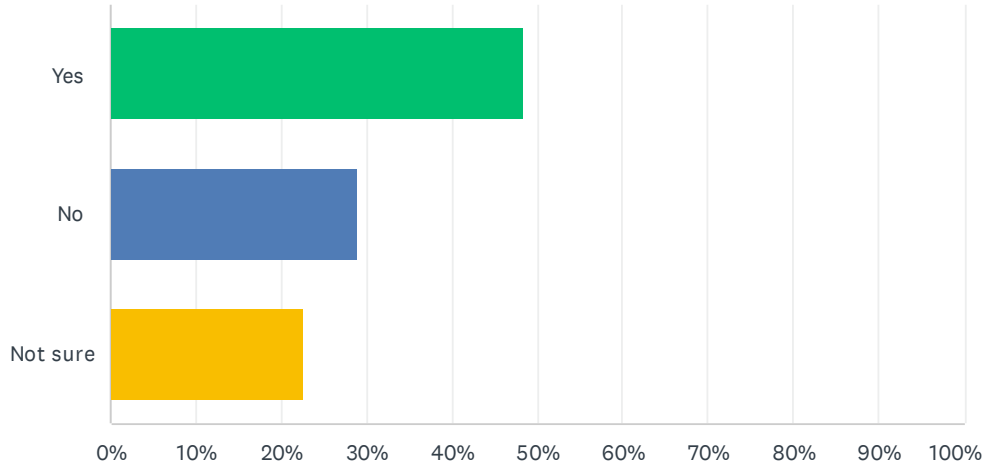
#	PLEASE TELL US WHY.	DATE
1	The current process exhibits several gaps, notably concerning the legal framework governing noise activities in leased buildings. Many leases explicitly prohibit noise activities during specific hours, as indicated on the building's lease agreements. However, by granting licenses for bars or other noisy activities, the council effectively undermines these leasing agreements, posing a legal risk. Allowing such activities, including bars with loud music and intoxicated patrons, can significantly diminish the property's value and rental appeal, leading to financial strain for the lessees. It begs the question: Is the council prepared to compensate for any financial losses incurred by property owners due to decreased property values caused by noise activities licensed within buildings with existing noise prohibitions in their leases? For instance, consider Bar 143 on High Street, which operates within a building where noise activities are explicitly prohibited by lease agreement. This highlights a clear inconsistency in the regulatory process that needs to be addressed promptly to safeguard the interests and financial stability of property owners and lessees.	2/11/2024 4:06 PM
2	There are already enough issues (noise, violence) as a result of alcohol consumption, there is no reason to encourage more of it.	2/6/2024 10:09 AM
3	Don't tar all citizens with the same brush. Nothing wrong with eating and drinking after 10pm or into the early hours.	2/4/2024 11:53 PM
4	Yes I do think offences related to alcohol should be reduced	1/26/2024 11:52 AM

## Watford Borough Council: Consultation on Licensing Act 2003 Statement of Licensing Policy (2023)

5	More should be done.	1/26/2024 11:41 AM
6	Yes it all makes sense to me to help monitor/keep a check on alcohol-related offences	1/26/2024 10:52 AM
7	The council needs to discourage late night hanging around the town centre, which fuels not just further intoxication and crimes, but also littering and creates an unsafe and unfriendly late night atmosphere.	1/26/2024 10:40 AM
8	It's ridiculous! The police are hugely over estimating the impact of bars	1/25/2024 7:15 PM
9	It's scary to go to the city center sometimes	1/24/2024 5:13 PM

### Q3 Do you think that the area to which the proposed LP3 (Cumulative Impact Policy) applies is correct and supported by the Police evidence?

Answered: 31 Skipped: 1

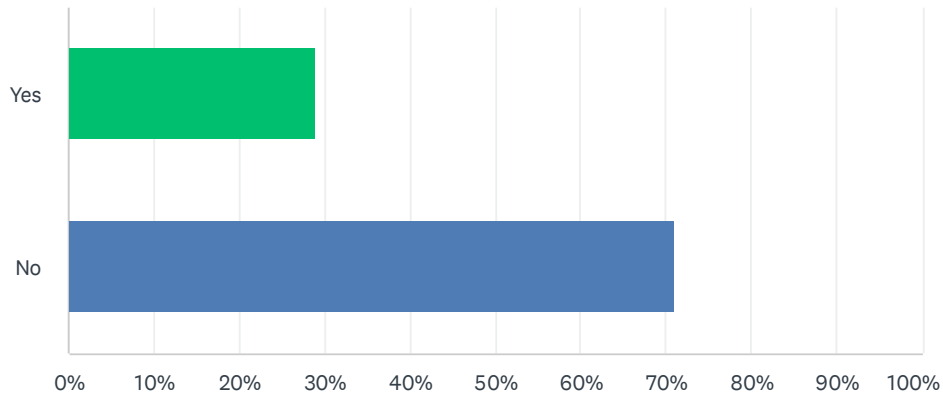


ANSWER CHOICES	RESPONSES
Yes	48.39% 15
No	29.03% 9
Not sure	22.58% 7
<b>TOTAL</b>	<b>31</b>

#	PLEASE TELL US WHY.	DATE
1	I live on the Queens Road. I think the area for this policy should be bigger than the High Stand the Parade.	2/1/2024 11:09 PM
2	As above.	1/26/2024 11:41 AM
3	Yes and those areas make sense given the businesses in those areas. You would expect say Clarendon Road to have less.	1/26/2024 10:52 AM

## Q4 Do you have any additional comments to make with regards to the policy which applies to the town centre that you would like the council to consider?

Answered: 31 Skipped: 1



ANSWER CHOICES	RESPONSES
Yes	29.03% 9
No	70.97% 22
<b>TOTAL</b>	<b>31</b>

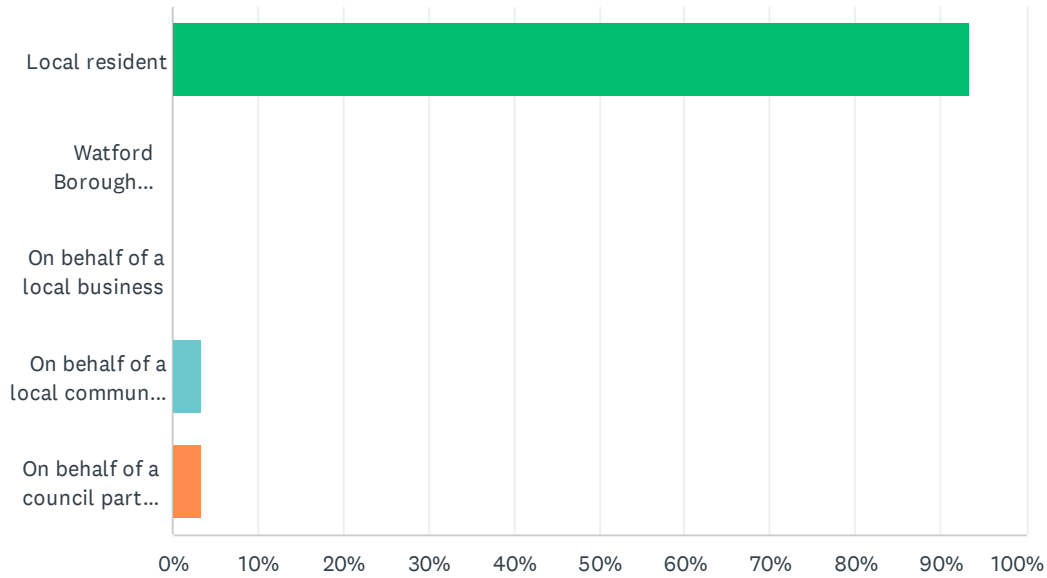
#	PLEASE TELL US WHY	DATE
1	The current process exhibits several gaps, notably concerning the legal framework governing noise activities in leased buildings. Many leases explicitly prohibit noise activities during specific hours, as indicated on the building's lease agreements. However, by granting licenses for bars or other noisy activities, the council effectively undermines these leasing agreements, posing a legal risk. Allowing such activities, including bars with loud music and intoxicated patrons, can significantly diminish the property's value and rental appeal, leading to financial strain for the lessees. It begs the question: Is the council prepared to compensate for any financial losses incurred by property owners due to decreased property values caused by noise activities licensed within buildings with existing noise prohibitions in their leases? For instance, consider Bar 143 on High Street, which operates within a building where noise activities are explicitly prohibited by lease agreement. This highlights a clear inconsistency in the regulatory process that needs to be addressed promptly to safeguard the interests and financial stability of property owners and lessees.	2/11/2024 4:06 PM
2	The crime prevention measures should also consider drug users who often can be found in public footpaths ( Reeds Walk for example)	2/5/2024 12:24 PM
3	As the number of homes built in and around this area are increasing I believe it is incredibly vital to ensure all is being done to lower the crime rate around the Parade and the high st	2/4/2024 12:25 PM
4	Council is killing the high street with its nanny state attitude.	1/31/2024 3:45 PM
5	It's no coincidence that the demise of watfords nightlife has coincided with a rise in crime, no one wants to go out in watford any more. An absolute disgrace, considering where it was 10+ years ago	1/30/2024 10:07 PM
6	While not having been a victim of crime within these areas it feels very uncomfortable walking down the Parade mid to late evening and also in St Albans Road near the pubs and Kentucky.	1/30/2024 9:01 PM

7	I think what has been achieved in the Town Centre with the addition of places like Puttshack is incredible and I think licensed leisure is a really good investment. I am not sure we need anymore licensed restaurants though, as we have so many now. In opposition to the Town Centre, the Parade has died over the last decade with pubs and bars closing down without replacement. It used to be a recommended destination, that people would visit from further afield. It's alright for early evening ventures and families, but if you want to have a night out, you might as well get on the train to St Albans or London.	1/29/2024 1:07 PM
8	Try policing the streets better at peak times	1/26/2024 11:40 AM
9	The town centre lack cohesion in planning, and doesn't need so many chicken shops or £1 shops.	1/22/2024 12:24 PM



## Q5 Please tell us in what capacity you are answering this survey

Answered: 30 Skipped: 2



ANSWER CHOICES	RESPONSES	
Local resident	93.33%	28
Watford Borough councillor	0.00%	0
On behalf of a local business	0.00%	0
On behalf of a local community group or organisation	3.33%	1
On behalf of a council partner / stakeholder	3.33%	1
<b>TOTAL</b>		<b>30</b>

## Q6 Please enter your details below:

Answered: 1 Skipped: 31

ANSWER CHOICES	RESPONSES	
Name of your organisation, group or business:	100.00%	1
Your role within the organisation, group or business:	100.00%	1
Your contact email and/or contact phone number:	100.00%	1

#	NAME OF YOUR ORGANISATION, GROUP OR BUSINESS:	DATE
1	Hertfordshire County Council	1/22/2024 11:17 AM

#	YOUR ROLE WITHIN THE ORGANISATION, GROUP OR BUSINESS:	DATE
1	Senior Trading Standards Officer	1/22/2024 11:17 AM

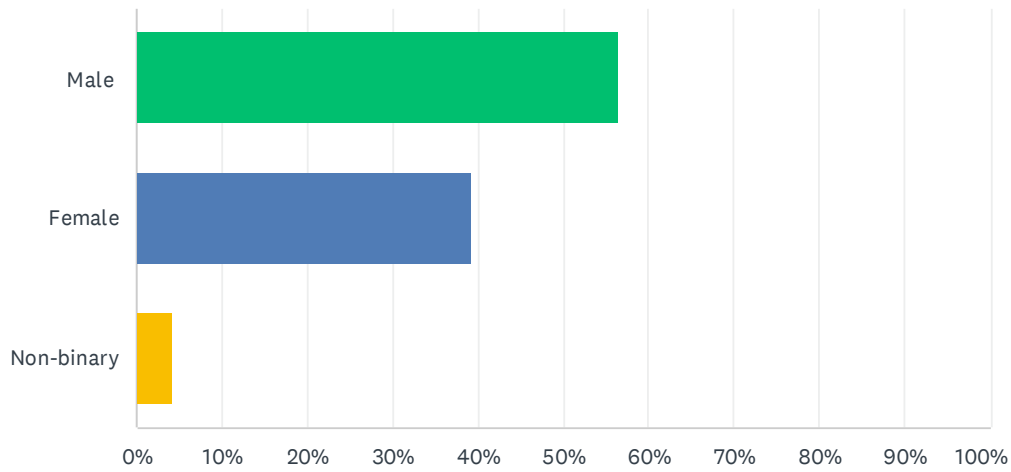
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## Q8 Which of the following do you describe yourself as?

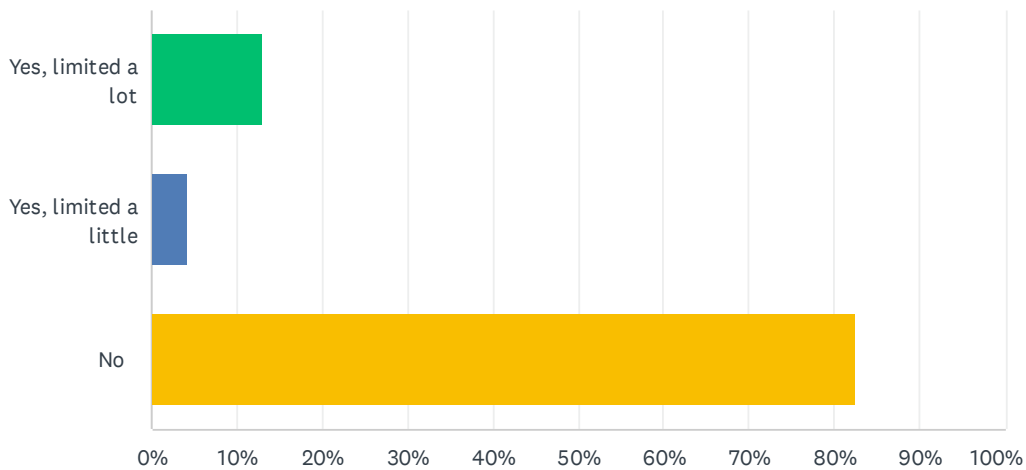
Answered: 23 Skipped: 9



ANSWER CHOICES	RESPONSES
Male	56.52% 13
Female	39.13% 9
Non-binary	4.35% 1
<b>TOTAL</b>	<b>23</b>

**Q9 The Equality Act 2010 protects disabled people. The Equality Act 2010 defines a person as disabled if they have a physical or mental impairment, which has a substantial and long term (i.e. has lasted or is expected to last 12 months) and has an adverse effect on the person’s ability to carry out normal day to day activities. Are your day-to-day activities limited because of a health problem or a disability which has lasted, or is expected to last, at least 12 months?**

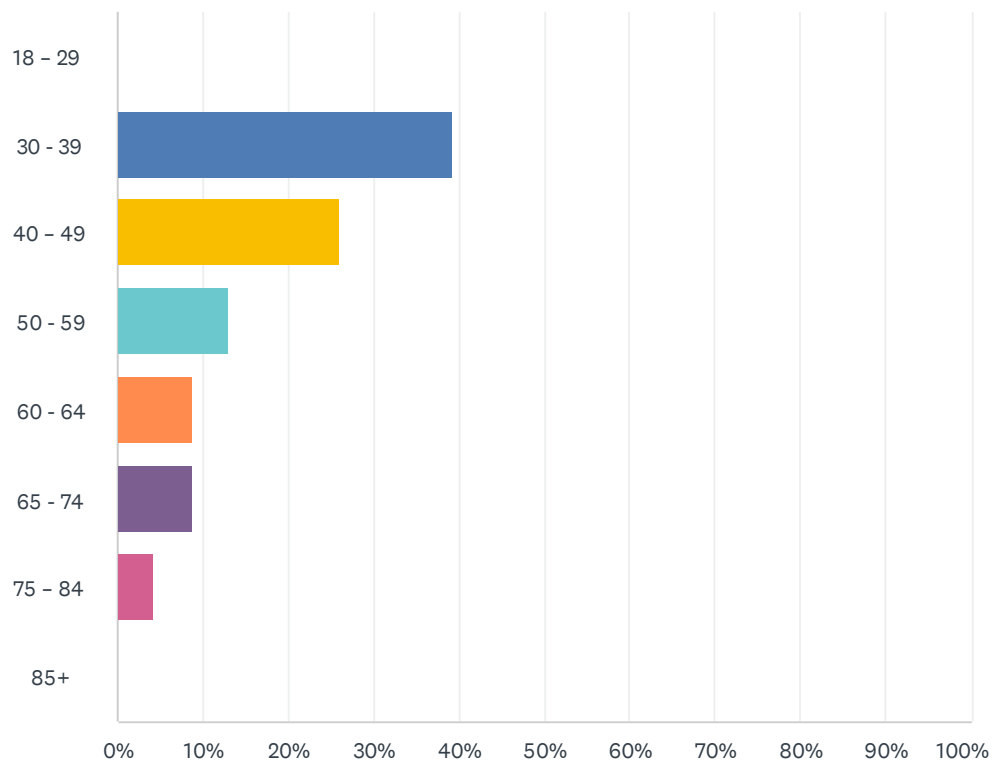
Answered: 23 Skipped: 9



ANSWER CHOICES	RESPONSES	
Yes, limited a lot	13.04%	3
Yes, limited a little	4.35%	1
No	82.61%	19
<b>TOTAL</b>		<b>23</b>

## Q10 Please indicate your current age group

Answered: 23 Skipped: 9

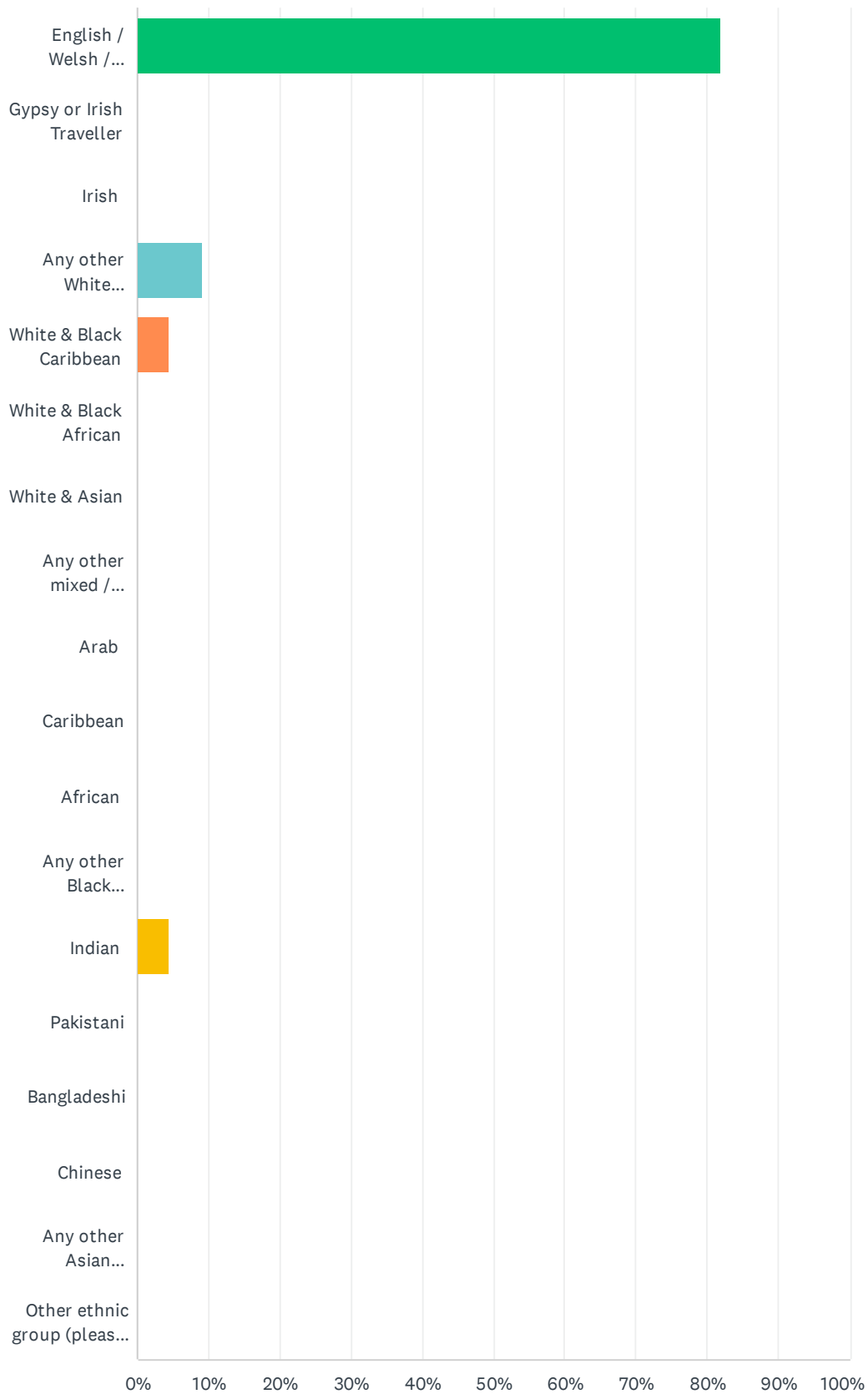


ANSWER CHOICES	RESPONSES
18 – 29	0.00% 0
30 - 39	39.13% 9
40 – 49	26.09% 6
50 - 59	13.04% 3
60 - 64	8.70% 2
65 - 74	8.70% 2
75 – 84	4.35% 1
85+	0.00% 0
<b>TOTAL</b>	<b>23</b>

## Q11 To which of these groups do you consider you belong?

Answered: 22 Skipped: 10





Watford Borough Council: Consultation on Licensing Act 2003 Statement of Licensing Policy (2023)

ANSWER CHOICES	RESPONSES	
English / Welsh / Scottish / Northern Irish / British	81.82%	18
Gypsy or Irish Traveller	0.00%	0
Irish	0.00%	0
Any other White background (please write in below)	9.09%	2
White & Black Caribbean	4.55%	1
White & Black African	0.00%	0
White & Asian	0.00%	0
Any other mixed / multiple ethnic background (please write in below)	0.00%	0
Arab	0.00%	0
Caribbean	0.00%	0
African	0.00%	0
Any other Black background (please write in below)	0.00%	0
Indian	4.55%	1
Pakistani	0.00%	0
Bangladeshi	0.00%	0
Chinese	0.00%	0
Any other Asian background (please write in below)	0.00%	0
Other ethnic group (please write in below)	0.00%	0
<b>TOTAL</b>		<b>22</b>

#	ETHNIC GROUP	DATE
1	White European	2/1/2024 11:10 PM



# Equality Impact Analysis

<b>Title of policy, function or service</b>	Licensing Act 2003 Statement of Licensing Policy
<b>Lead officer</b>	Austen Young
<b>Person completing the EIA</b>	Austen Young
<b>Type of policy, function or service:</b>	Existing (reviewed) <input checked="" type="checkbox"/> <b>X</b> New/Proposed <input type="checkbox"/>
<b>Version &amp; Date</b>	Version 4 February 2024

## 1. Background

Under the Licensing Act 2003, Watford Borough Council, in its role as licensing authority, is required to determine and publish a Statement of Licensing Policy (“policy”) every 5 years. The current policy was approved in 2023, is due to expire on 19 November 2028. The policy sets out the council’s approach to processing and determining applications submitted under the Licensing Act 2003. In addition to the policy, the council has also published a Cumulative Impact Assessment (“assessment”) which contains the justification for the Cumulative Impact Policy contained within the whole policy.

The purpose of the policy is to ensure that all licence applications received are treated fairly and in a consistent manner, provide advice and information for all about how the council will enforce, administer and make decisions under the Licensing Act 2003 and support licensable activities for the wider benefit of the community. The council must have regard to the licensing objectives as set out in the Licensing Act 2003, which are;

1. The prevention of crime and disorder
2. Public safety
3. The prevention of public nuisance
4. The protection of children from harm

The policy was last reviewed in October 2023 due to the previous policy being up for renewal, and being a statutory policy the council must ensure that it has a policy in force in order to carry out its functions under the Licensing Act 2003. The assessment was first introduced in April 2021 and requires renewal before April 2024.

The Licensing Act 2003 requires that each application is considered on its own merits. It does not permit certain groups or applicants to be treated differently, and all applications are to be processed in the same manner. Licence applications can be submitted by individuals aged 18 or older, statutory bodies, non-commercial organisations and commercial companies. Objections against licence applications can be made submitted by any person or one or more of the prescribed responsible authorities.

The policy specifically mentions, on page 45, that the licensing authority must implement the policy in a manner which is consistent with equalities legislation.

A draft assessment was sent out for consultation between 18 January and 16 February 2024. The Licensing Act 2003 and associated regulations prescribes the groups who need to be consulted, and the consultation process was approved by Licensing Committee on 11 January 2023.

## 2. Focus of the Equality Impact Analysis

The policy determines the council’s approach to processing and determining applications made under the Licensing Act 2003. This EIA, therefore, considers the potential equality related impacts, both positive and negative of the policy on the people in the groups or with the characteristics protected in the Equalities Act 2010.

These are:

1. Age
2. Disability
3. Gender Reassignment
4. Pregnancy and maternity
5. Race

- 6. Religion or belief
- 7. Sex (gender)
- 8. Sexual Orientation
- 9. Marriage and Civil Partnership

### 3. Engagement and consultation

The consultation on the policy took place between 18 January and 16 February 2024, during which time we consulted:

- the statutory responsible authorities
- 126 licensed premises and premises licence holders
- 42 licensing agents, who had acted for licence holders since the last policy review, as representatives of all licence holders
- 366 residents living within the Cumulative Impact Policy area of the High Street and The Parade
- 21 residents' associations and community groups throughout the Borough, as representatives of residents and users of the town centre
- Watford Town Centre BID
- Watford Community Safety Partnership
- All local ward councillors

All parties were offered the option to contact us should they have any queries or should they require a hard copy of the documents.

The consultation was advertised on our website during this time, with people invited to participate in a survey on the proposed changes.

The survey asked questions on the proposed policy and allowed parties to submit their own comments. We advised that while we will prefer responses to be submitted through the online survey or by email, we would accept any comments in writing.

In total the online survey received [to be completed]. [To be completed] responses were received directly from the responsible authorities.

### 4. What we know about licence holders

Specific information on the sex or ethnicity of applicants is not collected during the application process. Applicants do not have to live within the Borough, but the premises must be located within the Borough. The application forms are set by the Government as part of national regulations. We are required to carry out immigration checks on individual applicants but not record their ethnicity or nationality.

The following parties may apply for a premises licence or club premises certificate, and the provisions for who can apply are set out in the national legislation:

- (a) a person who carries on, or proposes to carry on, a business which involves the use of the premises for the licensable activities to which the application relates,
- (b) a person who makes the application pursuant to—
  - (i) any statutory function discharged by that person which relates to those licensable activities, or

- (ii) any function discharged by that person by virtue of Her Majesty's prerogative,
  - (c) a recognised club,
  - (d) a charity,
  - (e) the proprietor of an educational institution,
  - (f) a health service body,
  - (g) a person who is registered under Part 2 of the Care Standards Act 2000 (c. 14) in respect of an independent hospital [F2in Wales],
  - (ga) a person who is registered under Chapter 2 of Part 1 of the Health and Social Care Act 2008 in respect of the carrying on of a regulated activity (within the meaning of that Part) in an independent hospital in England,]
  - (h) the chief officer of police of a police force in England and Wales,
  - (i) a person of such other description as may be prescribed.
- (2) an individual may not apply for a premises licence unless he is aged 18 or over.
- (2A) An individual who is resident in the United Kingdom may not apply for a premises licence authorising premises to be used for a licensable activity within section 1(1)(a) or (d) unless the individual is entitled to work in the United Kingdom.

The policy does not implement any other criteria for applicants because this would be counter to the legislation.

## **4. What we know about passengers, residents and visitors to Watford**

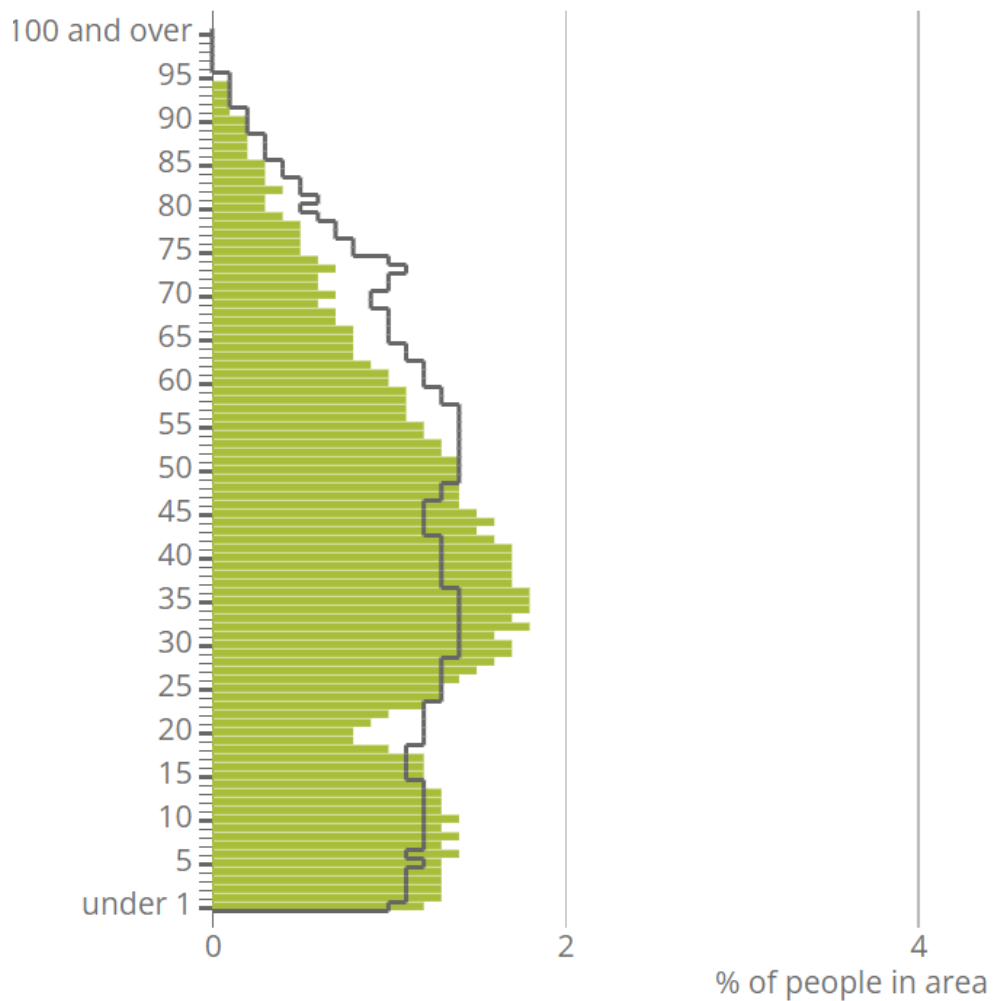
### **What we know about the Watford population**

#### **Population and age**

The population of Watford comprises 102,000 residents.

Watford is a town with a growing population. The census data 2021 indicates that Watford has a population of 102,300, an increase of 13.3% since the previous census in 2011. This is higher than the overall increase for England (6.6%), where the population grew by nearly 3.5 million to 56,489,800

The chart below shows Watford's age ranges between 0 – 100 and over in percentage of the population (green) compared with the England / Wales percentages (black line).



#### Ethnicity data:

- 48.4% identify as White British, White Irish, White Gypsy or Irish Traveller or White Roma
- 12.6% identify as Other White
- 8.0% identify as Pakistani
- 9.7% identify as Indian
- 0.5% identify as Bangladeshi
- 1.4% identify as White and Asian
- 5.3% identify as Other Asian
- 3.9% identify as African
- 1.7% identify as Caribbean
- 1.3% identify as White and Black Caribbean
- 0.7% identify as White and Black African
- 0.8% identify as Other Black
- 1.4% w identify as Other Mixed or Multiple ethnic groups
- 1.0% identify as Chinese
- 0.7% identify as Arab
- 2.8% identify as other ethnic group

#### Sex

- 50.8% of the Watford population are female

**Gender identity**

92.36% of residents over 16 have a gender identity the same as birth, 0.68% have a different gender identity, which equates to 247 people. 6.96% of people did not answer

**Disability**

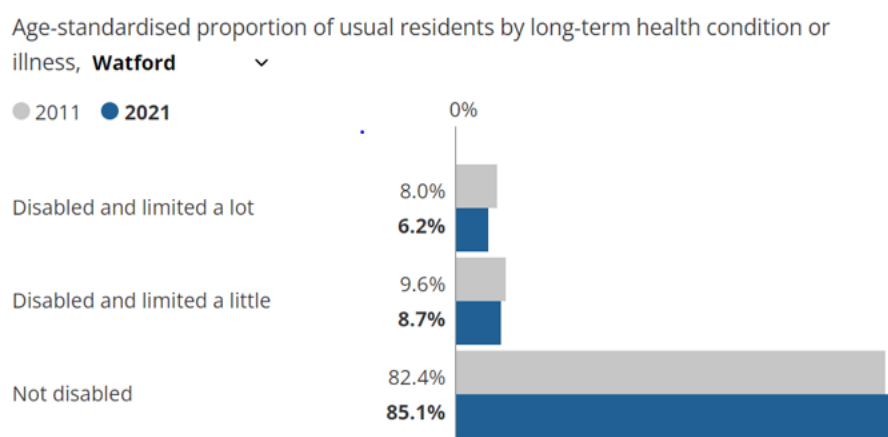
85.1% not disabled under the equality act, 6.2% disabled under the equality act, day to day activities limited **a lot**, 8.7% disabled under the equality act, day to day activities limited **a little**

**Health**

48.2% in very good health, 34.7% in good health, 12.4% in fair health, 3.6% bad health and 1.0% in very bad health

**Disability in Watford**

Watford saw the East of England's second-largest percentage-point fall in the proportion of residents who were identified as disabled and limited a little (from 9.6% in 2011 to 8.7% in 2021). proportions.



**6. What we know from the consultation feedback?**

**From the online survey**

Of the [to be completed] people who completed the survey, we know the following data:

- [To be completed] respondents identify as male, [TBC] identify as female, [TBC] identify as non-binary, and [TBC] skipped the question
- [TBC] respondents identify as being limited a lot in their day-to-day activities due to a health condition or disability, [TBC] identify as being limited a little in their day-to-day activities due to a health condition or disability, [TBC] identify as not having a health condition or disability which effects their day-to-day activities, and [TBC] skipped the question
- The age of respondents were as follows:
  - [TBC] were 18-29
  - [TBC] were 30-39
  - [TBC] were 40-49
  - [TBC] were 50-59
  - [TBC] were 60-64
  - [TBC] were 65-74
  - [TBC] were 75-84



- [TBC] were 85+
- [TBC] skipped the question
- The ethnic groups of respondents were as follows:
  - [TBC] identified as English / Welsh / Scottish / Northern Irish / British
  - [TBC] as Gypsy or Irish Traveller
  - [TBC] as Irish
  - [TBC] as Any other White background (please write in below)
  - [TBC] as White & Black Caribbean
  - [TBC] as White & Black African
  - [TBC] as White & Asian
  - [TBC] as Any other mixed / multiple ethnic background (please write in below)
  - [TBC] as Arab
  - [TBC] as Caribbean
  - [TBC] as African
  - [TBC] as Any other Black background (please write in below)
  - [TBC] as Indian
  - [TBC] as Pakistani
  - [TBC] as Bangladeshi
  - [TBC] as Chinese
  - [TBC] as Any other Asian background (please write in below)
  - [TBC] as Other ethnic group (please write in below)

No other information relating to the characteristics of the respondents was requested.

## **7. How will the council ensure equality is promoted through the introduction of this policy?**

The council is not in a position where it can proactively affect the profile of licence holders, or objectors against licence applications, but the policy ensures that the process of obtaining a licence is fair and free of discrimination. The policy informs prospective applicants what is expected of them and what specific areas a licensing sub-committee will take into account when determining an application. The policy also informs objectors how their objections will be considered, and again these must be considered in a fair manner, against legal requirements, and free of discrimination. The assessment sets out the evidence used to support the policy where in an open document.

There are no local barriers to anyone making an application.

It must be noted that the sub-committee may depart from policy when determining an application, although such departures should be explained with detailed reasons upon the conclusion of a hearing.

Information people will need to know about the application process, and the legislation, can be accessed via the council's webpage and this feature provides additional support and help to those with a range of equalities related issues such as those for whom English is not the first language, those with visual impairment or learning difficulties.

The council's website features 'browsealoud' which allows people to:

- translate pages into a range of different languages
- enlarge web pages
- activate voice over for web pages
- simplify web page content

Should an applicant's characteristics make it difficult to use this channel then face-to-face and telephone contact is still possible.

Under the Equality Act 2010, three areas need to be considered when analysing the equality impact of the Corporate Plan:

1. **eliminate** discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Act
2. **advance** equality of opportunity between people who share a relevant protected characteristic and people who do not share it
3. **foster** good relations between people who share a relevant protected characteristic and people who do not

## **A. Positive impacts**

The council has not identified any positive effects from the analysis of the consultation responses, the makeup of the Borough, and the way that applications are processed and licences issued.

By ensuring that Watford is a borough where alcohol licensing is well regulated the principles also ensure that it is a place where communities can live safely and peacefully together, thus fostering the good relations that are also part of the council's equality duty.

The aim of the licensing policy is to encourage the effective regulation of alcohol, regulated entertainment and late night refreshment. Through this it will help create a safe and attractive environment across the borough for all communities to enjoy. This, therefore, promotes an active and vibrant community which helps meet the council's duty to foster good relations between people who share a protected characteristic and those who do not.

It is also noted that it is a licensing objective to protect children from harm, and this is relevant when considering licensing applications. There were no specific comments received suggesting that the council's current policy and factors to consider with regards to protecting children from harm require change.

## **B. Negative impacts**

The council has not identified any negative impacts from the analysis of the consultation responses, the makeup of the Borough and the way that applications are processed and licences issued. The consultation has not identified any substantial positive or negative impacts from the responses themselves.

## **6. Overall conclusion**

On consideration, the overall conclusion of the EIA is that there is no negative impact on any specific characteristic or group as a result of this Policy.

In the policy, no particular group is given priority over another in relation to implementation of the policy and how any applicant is dealt with. The Act requires that each application is to be assessed on its individual merits, so all groups should be treated equally. All applicants are required to comply with all of the relevant legislation.

In general, it is felt that the policy has a positive effect on all people who live, work or socialise in  
Watford

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**This EIA has been approved by:**