

Dear Officers / Austen

Thank you very much for inviting Admiral Bars (Watford) to respond to your policy consultation scheduled to expire on Sunday 21 June. We act for Admiral Bars and we have been authorised to furnish you with the following commentary.

We make the following observations in respect of the sexual entertainment venues (SEV) part of the policy, as opposed to the sex shop element as this is outside the purview of our client's operations.

### **Licensing Policy Overview**

Our client's view is that the licensing policy works well. It attends (respectfully) to all the various legal issues that are material, it fairly articulates the absence of morality as a consideration within sexual entertainment venue licensing and sets out the basis on which matters are considered and determined.

We make one proposed amendment, re locations, below.

### **Diamonds and Strings**

As you will be aware Diamonds and Strings has operated as a table dancing and striptease venue within the city for a number of years. We are pleased to observe within the policy that table dancing venues do not, as a rule, give rise to concerns about crime and disorder or anti-social behaviour and that has been our experience.

Obviously from time to time issues arise and need attending to, as with all licensed premises, but we have found that the engagement with the authorities whilst formal and robust, has also been open and transparent with nothing that could fairly be described as being to the premises' discredit.

As you will also be aware the premises recently made an application to vary its premises licence (the alcohol late night refreshment and regulated entertainment permission) and this application was granted under delegated authority with no representations (objections) being received.

That is, we'd respectfully suggest, in and of itself, a positive observation about the existing operation.

### **Conditions**

Our client's sexual entertainment venue licence (and the associated premises licence) are carefully conditioned licences and the lack of objection to previous rules and the aforementioned lack of objection to a variation to permit increased hours (broadly), for the premises licence indicate, we believe, that the correct balance has been struck in the formulation of the various conditions and licences so as to ensure that the premises uphold the licensing objectives, (in so far as the premises licence is concerned) and attend to all of the additional and various concerns legitimately touched on in this policy, such as antisocial behaviour, protection of the vulnerable, protection of amenity etc.

### **Relevant Localities**

There is only one point in the current policy on which our clients would wish to pass observation and invite the authority to amend and/or change the existing provision. The premises referenced on page 10 of the existing policy at Market Street (between High Street and Exchange Road) is our client's premises.

We understand that no similar premises are anticipated nor desired in the following locations, Market Street between Exchange Road and Cassio Road, Queens Road, Lower High Street, Local shopping areas and Kingswood Leisure Park. We will not repeat the various reasons here but they are understood and we are respectful of them.

However, we would invite the authority to give consideration to a permission for an SEV, if one is not already in existence, on the Parade, High Street. We understand that a premises that now trades as a music and dance/food/alcohol premises used to operate entertainment of this sort from the location.

Our response to this consultation is to suggest that whilst it may be perfectly legitimate to control the number of sexual entertainment venues within the city centre, there is no legal basis, currently, on which premises should be presumed to be refused from operating within the Parade, High Street location.

We note that there is a reason given for the previous SEV licenced premises stopping offering relevant entertainment which is the development of its live entertainment offer. We cannot comment on whether that can fairly be said to be in support of the council's family friendly agenda, respectfully that appears to be a matter for the premises licensing considerations and policy.

What we believe can fairly be said are the following points:-

- . An SEV venue previously operated in this location
- . The development of its business away from this type of entertainment seems to be have been a commercial decision made by the operators not something arising as a result of policy issues, enforcement complaints nor concerns
- . The significant change in the profile of the High Street, with many closed and underinvested in units merits careful consideration
- . Footfall, particularly late at night, here, is light, in our view indicative of the diminution in the late night economy in this part of the city centre.
- . Whilst it may be an entirely legitimate request for premises of this sort to have discrete sensitive facia and advertising, the location itself couldn't and shouldn't fairly be described as somewhere that it would be inappropriate for premises of this sort to operate within.
- . Indeed the regeneration of the city centre through the use and occupation of the various leisure units could fairly be described as an imperative for the city.

Whilst it may be perfectly legitimate for the restriction on the volume of premises, as a whole, within the city centre to be maintained (candidly from the report we are currently a little unsure as to whether that is one or two), we see no legitimate basis on which there should be any distinction between the Parade, High Street and Market Street between High Street and Exchange Road. Those two locations could perfectly permit one premises to trade without in any way undermining the policy or the principles that sit behind it.

Whereas the locations identified as being inappropriate for these sort of premises have a rationale that can fairly be followed, we would respectfully suggest that no such rationale can be applied to the Parade/High Street. Indeed we would respectfully suggest that a premises operating to high standards with good security management CCTV and standards is an asset to the city centre.

We trust that fairly explains our observations, putting it more simply we would invite the authority to give consideration to either consolidating the Parade, High Street and Market Street between High Street and Exchange Road locations into one, or continuing to permit one/two SEV premises to operate, within the two locations.

If we can be of further assistance please don't hesitate to call.

Best wishes

Yours sincerely