

Agenda

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Licensing and Gambling Acts Committee

This meeting will be held on:

Date: **Monday 22 September 2025**

Time: **6.00 pm**

Place: **Long Room - Oxford Town Hall**

For further information please contact:

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Committee Services Officer

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Committee Membership

Councillors: Membership 15: Quorum 5: No substitutes are permitted.

Councillor Katherine Miles (Chair)

Councillor Edward Mundy (Vice-Chair)

Councillor Naomi Waite

Councillor Mary Clarkson

Councillor Mark Lygo

Councillor Simon Ottino

Councillor Louise Upton

Councillor Theodore Jupp

Councillor Jo Sandelson

Councillor Lois Muddiman

Councillor Ian Yeatman

Councillor Ajaz Rehman

Councillor Mohammed Azad

Councillor Rosie Rawle

Councillor James Taylor

Apologies and notification of substitutes received before the publication are shown under *Apologies for absence* in the agenda. Those sent after publication will be reported at the meeting. Substitutes for the Chair and Vice-chair do not take on these roles.

Agenda

	Pages
1 Apologies for absence	
2 Declarations of interest	
3 Minutes of the previous meeting Recommendation: to approve the minutes of the meeting held on 21 May 2025 as a true and accurate record.	7 - 18
4 Addresses by members of the public Public addresses relating to matters of business for this agenda, up to five minutes is available for each public address. The request to speak accompanied by the full text of the address must be received by the Director of Law, Governance and Strategy by 5.00 pm on Tuesday 16 September.	
5 Councillor addresses on any item for discussion Councillor addresses relating to matters of business for this agenda, up to five minutes is available for each address. The request should be received by the Director of Law, Governance and Strategy by 5.00 pm on Tuesday 16 September.	
6 Review of the Cumulative Impact Assessment and Special Saturation Policy The Deputy Chief Executive for Citizens and City Services had submitted a report to review the Cumulative Impact Assessment and determine the Special Saturation Policy. <u>Recommendations:</u> That the Licensing and Gambling Act Committee: 1. Consider the report and Cumulative Impact Assessment for	19 - 86

2025-2028.

2. Agree to the Cumulative Impact Assessment for 2025-2028 including the recommendation to control cumulative impact by retaining a Special Saturation Policy covering City Centre and East Oxford areas.
3. Recommend to Full Council adoption of the Cumulative Impact Assessment for 2025-2028 and continued Special Saturation Policy covering City Centre and East Oxford areas.

7 Dates of future meetings

The Committee is scheduled to meet at 6.00pm on the following dates:

- 9 February 2026

Information for those attending

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- Not to edit the recording in a way that could lead to misinterpretation of the proceedings. This includes not editing an image or views expressed in a way that may ridicule or show a lack of respect towards those being recorded.
- To avoid recording members of the public present, even inadvertently, unless they are addressing the meeting.

Please be aware that you may be recorded during your speech and any follow-up. If you are attending please be aware that recording may take place and that you may be inadvertently included in these.

The Chair of the meeting has absolute discretion to suspend or terminate any activities that in his or her opinion are disruptive.

Councillors declaring interests

General duty

You must declare any disclosable pecuniary interests when the meeting reaches the item on the agenda headed "Declarations of Interest" or as soon as it becomes apparent to you.

What is a disclosable pecuniary interest?

Disclosable pecuniary interests relate to your* employment; sponsorship (ie payment for expenses incurred by you in carrying out your duties as a councillor or towards your election expenses); contracts; land in the Council's area; licenses for land in the Council's area; corporate tenancies; and securities. These declarations must be recorded in each councillor's Register of Interests which is publicly available on the Council's website.

Declaring an interest

Where any matter disclosed in your Register of Interests is being considered at a meeting, you must declare that you have an interest. You should also disclose the nature as well as the existence of the interest. If you have a disclosable pecuniary interest, after having declared it at the meeting you must not participate in discussion or voting on the item and must withdraw from the meeting whilst the matter is discussed.

Members' Code of Conduct and public perception

Even if you do not have a disclosable pecuniary interest in a matter, the Members' Code of Conduct says that a member "must serve only the public interest and must never improperly confer an advantage or disadvantage on any person including yourself" and that "you must not place yourself in situations where your honesty and integrity may be questioned". The matter of interests must be viewed within the context of the Code as a whole and regard should continue to be paid to the perception of the public.

*Disclosable pecuniary interests that must be declared are not only those of the member her or himself but also those member's spouse, civil partner or person they are living with as husband or wife or as if they were civil partners.

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Minutes of a meeting of the Licensing and Gambling Acts Committee on Wednesday 21 May 2025

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Committee members present:

Councillor Azad	Councillor Clarkson
Councillor Jupp	Councillor Lygo
Councillor Miles	Councillor Muddiman
Councillor Mundy	Councillor Ottino
Councillor Rehman	Councillor Sandelson
Councillor Taylor	Councillor Upton
Councillor Waite	Councillor Yeatman

Officers present for all or part of the meeting:

Alison Daly, Legal Advisor
Joshua Curnow, General Licensing Team Manager
Katie Thorp, Supervising Senior Licensing Officer
Hannah Carmody-Brown, Committee and Member Services Officer
Jonathan Malton, Committee and Member Services Manager
Tanaka Merralls, Trainee Solicitor

Apologies:

Councillor(s) Rawle sent apologies.

17. Election of Chair for Council Year 2025-2026

Councillor Clarkson proposed, and Councillor Taylor seconded the nomination of Councillor Lygo to be elected as Chair of the Committee for 2025/26.

Councillor Sandelson proposed, and Councillor Jupp seconded the nomination of Councillor Miles to be elected as Chair of the Committee for 2025/26.

The two nominations were put to the vote and by 8 votes to 6, the Licensing and Gambling Acts Committee resolved that Councillor Miles be elected as the Chair for 2025/26.

18. Election of Vice-Chair for Council Year 2025-2026

Councillor Taylor proposed, and Councillor Upton seconded the nomination of Councillor Lygo to be elected as Vice-Chair of the Committee for 2025/26.

Councillor Jupp proposed, and Councillor Rehman seconded the nomination of Councillor Mundy to be elected as Vice-Chair of the Committee for 2025/26.

The two nominations were put to a vote and received 7 votes each. The result of a coin toss determined Councillor Mundy as the Vice-Chair of the Licensing and Gambling Acts Committee for 2025/26.

19. Declarations of interest

None.

20. Appointment of the Sub-Committees

The Director of Law, Governance, and Strategy had submitted a report to establish the Licensing and Gambling Casework Acts Sub-Committees for the 2025-26 Council Year to deal with the casework flowing from the Committee's own responsibilities.

The Committee and Member Services Manager introduced the report, explaining that as many Sub-Committees as required can be appointed throughout the year. Members were reminded of the requirement to attend mandatory training in order to ensure their ability to sit on Sub-Committees throughout the forthcoming year. The Committee and Member Services Manager also reminded the Committee that appointments to Sub-Committees are not bound by political proportionality.

The Licensing and Gambling Acts Committee unanimously resolved to:

1. **Appoint** as many licensing casework sub-committees of three members as there are combinations of three members in the total number of members of the Committee.
2. **Note** the Sub-Committees' powers and duties as set out in Appendix 1 to this report.
3. **Agree** the dates on which the Sub-Committees will meet if required.

21. Cumulative Impact Assessment

The Chair invited Councillor Hollingsworth to address the Committee.

Councillor Hollingsworth expressed that his address would not negatively comment on the report or its drafting, but rather on the Special Saturation Policy and the Cumulative Impact Assessment themselves. The Committee were reminded that licensing falls within his Cabinet portfolio. Councillor Hollingsworth outlined that the original version of the policy that existed in the early 2000s and compared the context relating to venues and licenses between that time, and now in 2025. The Committee heard of his concern that premises which positively enable the connection of culture, leisure and art, are being lost through the stipulations of the policy now and licence are being unnecessarily reduced across the city. In concluding, Councillor Hollingsworth requested that the Committee deferred their decision on the report to a later meeting to allow sufficient time for more data and evidence to be reviewed and reconsidered. With a view to recognising the current context of Oxford city as opposed to historical considerations.

The Chair invited the Supervising Senior Licensing Officer to present the report which the Deputy Chief Executive for City and Citizens' Services had submitted to review the Cumulative Impact Assessment and determine the Special Saturation Policy.

The Committee heard that the report presented the Cumulative Impact Assessment for 2025-2028 following a nine-week consultation period and understood that it serves as an evidence-based tool for considering the adoption of a Special Saturation Policy. As a result of the current CIA, the Supervising Senior Licensing Officer explained that the Licensing Authority is currently of the opinion that the number of licensed premises and club premises within the City Centre and East Oxford is such that it is likely that granting further licences or variations to licences, would be inconsistent with the duty to promote the licensing objectives. Details of the responses to the consultation period were outlined, as enclosed in appendix 2 of the report, and a summary of data and findings relating to crime were summarised. As a result of the consultation period and analysis by the Licensing Authority, the Committee were presented with a new proposed CIA for 2025 to 2028 which retained the opinion of the previous assessment. Details of this were enclosed in appendix 3 for the Committee to review. The Supervising Senior Licensing Officer requested that the Committee recommend to full Council adoption of the CIA 2025-2028 which retains the SSP covering Oxford City Centre and East Oxford.

The Chair thanked the Supervising Senior Licensing Officer and invited questions from the Committee.

Councillor Upton sought clarification of the objectors' argument that the adoption of the SSP could lead to the closure of multiple businesses. The Supervising Senior Licensing Officer noted that there is little evidence to support this argument, and the question would be hard to respond to as it is not the view of the Licensing Authority. It was also clarified that the Licensing Authority does not find the SSP to stop applications being heard on their own merits but does ensure that robust conditions can be added to ensure licensing objectives are upheld. In response to Councillor Upton's questions, Councillor Taylor commented that he also does not see businesses closing because of the SSP, however has observed that planning rules encourage new businesses to open

on the site of previous closures and that the SSP could potentially limit this. The Committee heard some examples.

Councillor Ottino asked the following questions:

- Why the CIA for the city centre does not include Westgate given that it houses bars on the roof terrace.
- Why there is one policy for two different areas of the city, in reference to the city centre and East Oxford.
- Whether there is a means by which police data relating to Cowley Road can be disaggregated to determine those offences linked to drinking and consuming drugs on streets.

In response, the General Licensing Team Manager explained that Westgate is not included because evidence from police data does not support its inclusion. The Committee heard that the Westgate premises are well managed by on-site security, have existing restricted hours, and the zone has not raised concerns within the Licensing Authority or recent CIA. As the data has not changed since 2022, the recommendation to exclude the Westgate has remained. Secondly, regarding the lack of policy separation between Oxford City Centre and East Oxford, the General Licensing Team Manager explained that adoption of an SSP is set out in statute, and a single policy can outline details of one or more area within a district.

Councillor Upton left the meeting.

In response to Councillor Ottino's question regarding police data, the Supervising Senior Licensing officer explained that police data covers the entire Oxfordshire region, from which the Licensing Authority extracts necessary information for the Oxford City region. The Committee heard that this does not always explain specifically where the offences came from and provides more of a general overview of crime and disorder related to the nighttime economy. The General Licensing Team Manager further commented that the police data is combined with other sources including hospitals, from which correlations and conclusions can be drawn in line with central government guidance. It was also explained that the location of an offence is not always recorded in connection with a licensed premises, and rather the pavement outside it, meaning that accurate location understandings cannot always be drawn.

In relation to Westgate, Councillor Ottino noted that the policy is focused on future issues and licences so therefore questioned why historical data relating to Westgate is related to the Licensing Authority's considerations. It was also noted that Westgate currently holds some empty units and concern for the effects of these on the city centre was expressed. The General Licensing Team Manager noted that all premises at Westgate have a capped closure time and therefore do not enter the periods considered to be that of the nighttime economy, as such the empty units would have no bearing on the SPP. It was also assured that the later hours premises have not been evidenced to have an impact on the nighttime economy either and police are not

attending this area. The Chair also clarified that the point of the CIA is to focus on retrospective data to inform future policy.

Councillor Rehman supported Councillor Hollingsworth's and Councillor Taylor's earlier suggestions that what worked twenty years ago, is not necessarily now appropriate for the area. In regards Westgate specifically, it was asked whether its exclusion from the CIA affords the site preferential treatment in comparison to an area such as George Street. Secondly, compared to Oxfordshire, Councillor Rehman noted that he would expect a city to have more people, more police and more crime, so questioned whether data is measured in percentages to allow accurate analysis. Finally, Councillor Rehman advocated for close working with the police and fire service and supported Councillor Hollingsworth's suggestion of the need for more data and analysis from these sources to ensure that the economy is being thought about more broadly, with recognition that the nighttime economy is suffering.

The Chair summarised by asking whether the CIA prevents new applicants from being licensed and for officers to confirm that if objections are raised, that the application is brought to a Sub-Committee.

Councillor Rehman reiterated that the rules set 20 years ago are no longer appropriate to the local context, noting that establishments are closing and new ones not arising because rules are outdated.

The General Licensing Team Manager explained the context of the policy in Oxford and how it operates, recognising that the language and terminology used in CIA and SSP is strong however also explaining that it does not mean that no consideration will be made to other future applications. The Committee heard that the policy is supported by Secretary of State guidance and is used as the basis for why an application could be refused if necessary; this does not mean that the fundamental way in which decisions are made are altered. It was confirmed that each application is considered on a case-by-case basis and on individual merit with consideration of licensing objectives. The General Licensing Team Manager detailed the process through which applications go if more information is required, including liaison with other responsible authorities. If these stages fail, then an application will go to a Sub-Committee for determination. The Committee heard some statistics to support this, including that the General Licensing Team Manager had not found evidence over the last 8 years of an application refusal based solely on the SSP.

Councillor Rehman reiterated his question about the Westgate receiving preferential treatment as it is excluded from the CIA and noted his belief that it should be considered as part of the city centre. The General Licensing Team Manager clarified that there is no preferential treatment as the policy puts all applications through the same scrutiny process for need to uphold licensing objectives. The only difference to being included within the policy is the enhanced requirement to demonstrate a more detailed and thoughtful application, with regard for the context of the city centre. The Committee understood that the policy seeks to flip the assumption that licenses are

automatically given and to encourage more detailed applications and planning for premises. In regard local crime rates, the General Licensing Team Manager agreed that Oxford is expected to exhibit higher numbers and thus, the CIA is adopted in the city as opposed to rural areas to support this matter.

Councillor Muddiman asked Councillor Hollingsworth firstly, if the Committee did pause and requests a review of the policy, what new evidence would he be seeking, and secondly, whether the evidence provided during the meeting had influenced his request in any way. Councillor Hollingsworth noted that his only request is for more exploration into the existing data to be pursued and more in-depth conclusions to be presented. The Committee also heard that the statistics provided only relate to those who have applied for a licence; he raised concern about how many may be deterred from applying in the first instance by the presence of strong wording within the SSP, and therefore whether businesses are being pushed out of Oxford. Possible examples were provided. Councillor Taylor echoed these comments and noted concern for the presence of possible survivorship bias in the data. Councillor Clarkson disagreed and referred to the national trend of nightclub closures and broader economic trends which the CIA could not be responsible for.

Councillor Mundy asked what would necessitate a reconsideration of the need for the SSP and whether this hinges entirely on representations from statutory bodies. Concern was noted about whether the policy is geared at addressing resourcing issues of the police, for example. Councillor Mundy also asked whether there is an understanding that the weekend will always exhibit an unbalanced impact on the need to maintain a secure environment as it will always inherently differ from ordinary weekdays. Finally, the Committee noted the broadly shared concern for the need to protect and encourage a variety of venues in Oxford City and Councillor Mundy's wish for more stakeholders to have responded to the consultation survey. It was asked whether more could be done to obtain more responses in the future.

Councillor Jupp asked Councillor Hollingsworth whether deferring recommendation of the policy would just be postponing the necessary scrapping of the policy to which the Committee heard that it is not necessarily negative for the area to have an SSP, but more that the wording of the CIA and the unintended deterrents of the CIA could require additional consideration.

The Chair expressed concern for the protection of the public, noting that she resides near a cumulative impact area and has firsthand experience of the impacts of the nighttime economy on vulnerable residents. Details regarding the scrapping of the Council's noise reporting service were detailed alongside her personal view that work should be done to support the changing business models of businesses. The Chair asked at what stage edits to soften the language used within the policy could be made along with additions to recommend work to assess how the nighttime economy could be supported.

The Legal Advisor offered to explain options available to the Committee following a response from the General Licensing Team Manager on the sequence of questions asked.

The General Licensing Team Manager firstly responded to Councillor Taylor and clarified that it is the view of the Committee as to whether they are concerned about those who may be deterred from submitting applications based on the policy; there is no evidence to support this. In response to Councillor Mundy, the General Licensing Team Manager explained that a review of the policy would be necessitated if requested by the Committee, however this already occurs every three years; the presentation of the report at this meeting is the opportunity for the Committee to amend and review the policy. Regarding the lack of responses to the consultation, the Committee heard that the Licensing Authority had worked as hard as possible to obtain responses and contacted every licence holder in Oxford and all relevant bodies. Out of 12 responsible authorities, only 3 had responded and the General Licensing Team Manager noted that it is challenging to encourage responses when people cannot visualise directly the results of the policy in question. The Committee were also assured that the 9-week consultation period was longer than the 3-week standard timeframe. In response to Councillor Hollingsworth, the General Licensing Team Manager outlined that if the report were deferred, there would be concern about what more could be obtained and analysed as officers possess no authority to compel others to provide more evidence. Finally, in response to Councillor Miles' concerns about protection of the public, the Committee were assured that parallel work is ongoing to promote the nighttime economy, and more details could be offered on this which had not been included in the report at this meeting as it was not deemed directly relevant. The General Licensing Team Manager explained that the CIA and SSP are only one way the Council attempts to protect the public, as dictated by legislation. It was also explained that the strong language within the policy is dictated by central government guidance and cannot be altered or 'softened'.

The Legal Advisor informed the Committee that they are required to consider the recommendation with the report; agreeing would take the report to full Council at which time it would be voted to either adopt the policy or not. If the Committee during this meeting chose to vote against the recommendation, then further recommendations might be proposed, seconded and voted on. Members were reminded that all relevant matters for their consideration were contained within the report but if they felt that they did not have sufficient information, they may propose to defer a decision. If the latter option were selected, it would be good practice for the Committee, through the Chair, to state what is missing, and the questions they would like officers to work on ahead of the next meeting. The Legal Advisor also advised the Committee on the timelines. Finally, the Legal Advisor clarified that the Committee is tasked with voting on the recommendation, and not the report, therefore it may not have much impact to alter the wording of the report.

The Committee and Member Services Manager also clarified that the next full Council meeting is on 14 July 2025, and the report would reach this meeting if the recommendation was agreed during this meeting. If not, any further work by officers

would need to come back before an additional meeting of this Committee before this date. The final option would be for any recommended policy to go before full Council in October 2025, and the next meeting of the Licensing and Gambling Acts Committee would be as scheduled in September 2025.

The Chair sought to clarify that if there is no current SSP in place, whether any new applications in the meantime would be subject to the conditions of the policy. The Legal Advisor explained that if the Committee vote to bring the policy into effect and vote to reconvene to make further recommendations and review, then the policy would be in place and could be applied to applications. However, if the Committee did not vote to recommend the policy to full council today, then it would not be ratified and adopted. If this were the case, then applications could still be received, considered, and brought to a Sub-Committee if necessary.

Councillor Muddiman acknowledged that the wording of the policy could not be altered but sought to clarify whether the Committee could vote to scrap the policy all together during this meeting.

The General Licensing Team Manager clarified that if the Committee believed that the addition of new or varied premises would not undermine the Council's ability to uphold licensing objectives, then they should not recommend the Policy to full council. The Committee also heard that this would not prohibit the principles of cumulative impact being considered on a case-by-case basis when decisions are being made on applications, but that those considerations need to be backed by relevant evidence and/or given less weight.

Councillor Muddiman expressed her view that she would not be content with scrapping the policy entirely and suggested that the Committee now approve it to retain it and recommend a review in the future. The Legal Advisor reiterated that if the Committee agree to recommend the policy to full Council with a review, then the agenda for this workstream should also be set.

Upon a vote on whether to recommend to Full Council the adoption of the Cumulative Impact Assessment for 2025-2028 and continued Special Saturation Policy covering City Centre and East Oxford areas, 5 members voted in favour and 7 members voted against. The recommendation to Council was voted against.

The Legal Advisor explained that the Committee could now set a timeframe for any further work they wished to see in order to review the policy, noting the options of this being completed by either July or October to enable any recommended policy to go to full Council.

The Chair requested the views of the Committee members and commented that it may not be reasonably possible to expect this work in time for a deadline of July. The Chair

suggested the work be requested for the next meeting of the Committee in September, to ensure that the report could be taken to Full Council in October.

Councillor Jupp requested that the Committee vote on whether to scrap the policy and no further work to be requested of officers. Councillor Jupp proposed an alternative recommendation to scrap the SSP; this was seconded by Councillor Taylor.

Councillor Lygo sought clarity on the implications of voting to scrap the policy. Councillor Jupp clarified that his recommendation did not request further work to be brought back just a scrapping of the policy in its entirety.

The Chair clarified that the recommendation from Councillor Jupp proposed no further work to take place surrounding the policy and for it to be scrapped. It was also noted that this would be contrary to the request from the Licensing Authority to support the recommendation of the policy.

The Legal Advisor supported this summary and clarified that any recommendation of the policy to full Council in the near future would be quashed. If Councillor Jupp's recommendation were to fall, then there could be further recommendations for work from officers and a further report to the Committee.

The Chair verbally considered the licensing objectives and clarified the implications of the recommendation to the Committee.

Upon a vote, the Committee voted against Councillor Jupp's alternative recommendation to scrap the policy by 9 to 2.

The Legal Advisor noted that further recommendations could now be tabled.

Councillor Lygo raised a point of order and requested the Committee adjourn. The Chair rejected this.

Based on earlier comments, Councillor Rehman proposed an alternative recommendation to ask officers to include the Westgate centre within the city centre CIA and to have a separate policy for Cowley Road.

In response to questions, it was clarified that this recommendation could be debated.

Councillor Ottino proposed additions to the recommendation including a request for additional evidence regarding different areas within the CIA, on the number of premises

within each part of the city, on police numbers, and statistics on declines over a 10-year period.

The Legal Advisor and General Licensing Team Manager discussed the feasibility of these requests.

The General Licensing Team Manager explained that data on declines in premises numbers could be provided however it would be more difficult to distinguish types of license and provided data on this as it would not align to the way in which premises are defined under legislation; they are defined by the activities they permit, for example sale of alcohol which could be a music venue, a bar, or a pub. In regard policing numbers, the ability to report on this to the Committee depends on the police providing such information and this cannot be guaranteed. Finally, in response to the request for varying policy for different premises, this could not be achieved as legislation does not allow for it.

Councillor Muddiman suggested a review timetable for the next 6 months be established and for the policy to be put in place in full in the meantime, pending the results of the review.

The Legal Advisor noted that the ability to vote on this would require Councillor Rehman to withdraw his recommendation.

Councillor Sandelson queried whether new licenses are pursued after a premise closes down to which the General Licensing Team Manager explained the lifetime of premises licences and the conditions around these.

Councillor Jupp seconded Councillor Rehman's recommendation with the inclusion of Councillor Ottino's amendments.

Councillor Rehman withdraw his recommendation.

Councillor Muddiman proposed an alternative recommendation to review the policy over six months and recommend the SPP to full Council for adoption at its next meeting; Councillor Lygo seconded. Councillor Muddiman clarified that she accepted Councillor Ottino's amendments as criteria for the suggested review.

The Chair and Legal Advisor clarified that the recommendation could only be to recommend work be undertaken to review the policy before the next Committee meeting and not recommend the existing policy to full Council as this had already been voted down by the Committee.

The General Licensing Team Manger confirmed that it could be feasible to consider most of Councillor Ottino’s recommendations and return to a future Committee meeting with alternative options and recommendations.

Upon a vote, the Committee voted in favour of Councillor Muddiman’s revised recommendation by 12 to none with one abstention:

- 1. For Officers to **review** the comments received from the Committee regarding the initially proposed Special Saturation Policy and draft a further report that would be brought to the next Licensing and Gambling Acts Committee meeting in September 2025.

22. Minutes of the previous meeting

The Committee resolved to **approve** the minutes of 10 February 2025 as a true and accurate record and accurate record.

23. Dates and times of meetings

The Committee noted the dates and times of future meetings.

The meeting started at 6.05 pm and ended at 8.10 pm

Chair
2025

Date: Monday 22 September

When decisions take effect:
Cabinet: after the call-in and review period has expired
Planning Committees: after the call-in and review period has expired and the formal decision notice is issued
All other committees: immediately.
Details are in the Council’s Constitution.

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To: Licensing & Gambling Act Committee
Date: 22nd September 2025
Report of: Deputy Chief Executive for Citizens and City Services
Title of Report: Review of the Cumulative Impact Assessment and Special Saturation Policy

Summary and recommendations	
Decision being taken:	To review the Cumulative Impact Assessment and determine the Special Saturation Policy
Key decision:	No
Corporate Priority:	Strong, Fair Economy & Thriving Communities.
Policy Framework:	Statement of Licensing Policy.

Recommendation(s): That the Licensing & Gambling Acts Committee resolves to:
<ol style="list-style-type: none"> 1. Consider the report and Cumulative Impact Assessment for 2025-2028. 2. Agree to the Cumulative Impact Assessment for 2025-2028 including the recommendation to control cumulative impact by retaining a Special Saturation Policy covering City Centre and East Oxford areas. 3. Recommend to Full Council adoption of the Cumulative Impact Assessment for 2025-2028 and continued Special Saturation Policy covering City Centre and East Oxford areas.

Appendix No.	Appendix Title	Exempt from Publication
Appendix 1	2022-2025 Cumulative Impact Assessment	No
Appendix 2	Consultation Responses & Analysis	No
Appendix 3	Licensing Authority Briefing Note	No
Appendix 4	2025-2028 Cumulative Impact Assessment	No
Appendix 5	Equality Impact Assessment	No

Introduction and background

1. A responsibility of the Licensing Authority is to promote the four licensing objectives enshrined in the Licensing Act 2003:
 - The Prevention of Crime and Disorder
 - The Promotion of Public Safety
 - The Prevention of Public Nuisance
 - The Protection of Children from Harm
2. The distribution of premises may be such as to warrant special action from the Authority to combat exceptional problems of disorder and public nuisance over and above the impact from individual premises.
3. A Cumulative Impact Assessment (CIA) is used as an evidence-based tool for Licensing Authorities to consider adoption of a Special Saturation Policy (SSP); which creates a rebuttable presumption that applications for a new Premises Licence, Club Premises Certificate or material variations will normally be refused, if relevant representations are received, unless it can be demonstrated that the operation of the premises involved will not add to the cumulative impact of crime and anti-social behaviour in the area.
4. An SSP is intended to ensure stronger safeguards are in place in higher crime areas, preventing additional nuisance, crime, and disorder. Applicants are expected to address the broader context and existing challenges in the area that they operate, such as ongoing issues with anti-social behaviour, or pressures on local services, even if they are new and have not contributed to existing issues. This approach ensures the application doesn't unintentionally add to those problems and enables the Licensing Authority to address applications that fail to adequately consider the cumulative impact. In doing so, the Authority is better equipped to protect residents, manage the night-time economy, and uphold the licensing objectives in areas experiencing high levels of crime and anti-social behaviour.
5. The previous CIA and SSP (April 2022 – March 2025) states that the Authority is of the opinion that the number of licensed premises and club premises certificates within the City Centre and East Oxford area is such that it is likely that granting further licences or variations to licences would be inconsistent with the authority's duty to promote the licensing objectives. This statement is a statutory requirement and does not mean that all new or varied applications will be refused; rather, each application will be considered on its own merits, and applicants will be expected to demonstrate robust measures to uphold the licensing objectives in these areas.

A copy of the 2022-2025 Cumulative Impact Assessment can be found at **Appendix One**.

6. During the previous policy period (April 2022 – March 2025), the Licensing Authority received a total of 120 new premises licence or variation applications. Of these, 52 were located within SSP areas (39 in Central Oxford and 13 in East Oxford). Eight of these applications were referred to a Sub-Committee for determination, with 3

attracting objections from the police citing the SSP. One application (variation) was refused, 51 were granted with existing or additional conditions.

Consultation Analysis

7. The Licensing Authority carried out a nine-week consultation period, which started on 17th February 2025 and ended on 21st April 2025.
8. The Authority received responses from responsible authorities, Oxfordshire Fire and Rescue and Thames Valley Police, and a further twenty-seven (27) responses from the public during the consultation period.
9. Oxfordshire Fire and Rescue strongly agreed to keeping both Special Saturation Policies in the City Centre and East Oxford. Their main concerns regarding the night-time economy were:

1. *Violence and Anti-Social Behaviour*

- Alcohol-Related Incidents: High concentrations of bars and clubs can lead to increased incidents of violence and anti-social behaviour.*

- Public Disorder: Large crowds can sometimes result in fights or disturbances, especially late at night.*

2. *Drunken Behaviour*

- Noise and Disturbances: Drunken behaviour can lead to noise and disturbances, affecting the quality of life for local residents.*

- Vandalism: There can be an increase in vandalism and property damage due to intoxicated individuals.*

3. *Safety When Getting Home*

- Personal Safety: Concerns about personal safety, especially for women and vulnerable individuals, when traveling home late at night.*

- Transport Availability: Limited availability of safe and reliable transport options late at night can be a concern.*

10. Thames Valley Police also strongly agreed to keeping both Special Saturation Policies in the City Centre and East Oxford. Their main concerns regarding the night-time economy were:

Alcohol related crime, disorder, anti-social behaviour and nuisance as well as safeguarding of the vulnerable and violence against women and girls (VAWG) stemming from the night-time economy has a significant impact on the police.

It uniquely requires a specific policing operation and additional resources (something that is not done for any other time of the day or day of the week), all of which pulls the police away from our duty to the overall policing of Oxford as a whole and indeed supporting the other areas of the Thames Valley should a critical incident occur.

The further provisions of licensable activities in the area, whether that is through new premises or later hours for alcohol , or late night refreshment

venues/vans which in themselves operate as hot spots for alcohol related violence due to the congregation of intoxicated persons after the clubs and bars have shut, has been shown to exacerbate the significant demand on the police.

It is only through the consistent and robust application of the SSP by the licensing committee that we have seen a move away from such venues, toward attracting more diverse and congenial business models which has gone to help promote Oxford (with its international reputation) as a safe and pleasant place for the public with a vibrant business offer in the NTE. It has also stemmed the ever persistent march towards later and later operating hours of the NTE that was being seen prior to the implementation of the SSP. To lose the policy would be to open the flood gates and undo all of that work.

11. The Authority received seventeen (17) responses from residents of Oxford, five (5) responses from people who work in Oxford, seven (7) responses from local business owners or managers who hold a premises licence, and one (1) response from a local business owner or manager who does not hold a premises licence.
12. Approximately half of these responses strongly disagreed with keeping the Special Saturation Policy areas of both City Centre and East Oxford, with only 15% of responses strongly agreeing.
13. Those that disagreed with keeping the SSP raised concerns that Oxford does not have a thriving night-time economy and that continuing with the policy will lead to multiple businesses closing.
14. Those that agreed with the SSP raised concerns similar to those highlighted by the responsible authorities; drunken behaviour and safety, walking through Oxford at night is threatening, threatening behaviour by drunk people, noise resulting from drunken behaviour.

A copy of all the responses received can be found at **Appendix Two**.

Cumulative Impact Data Analysis

15. The crime data presented, illustrates there has been no significant decrease in relevant crime in Oxford's top four LSOA's (Lower Super Output Area) since the previous SSP was adopted.
16. The violence with injury data correlates closely with the night-time economy, with the heat map concentrating on Friday and Saturday night between 19:00 hours and 03:00 hours.
17. The CCTV data demonstrates significantly more public space incidents during the night-time economy period.
18. The hospital data correlates with the night-time economy, with a concentration of hospital admissions around Friday and Saturday night and 30% of attendances

being alcohol related.

19. While the evidence may not directly attribute crime, disorder, or alcohol-related harm to a specific license premises, it consistently correlates with the night-time economy. This pattern highlights the importance of considering these issues when assessing any new or variation applications within SSP areas. Applicants and decision-makers should take into account the cumulative impact that licensed premises could have on areas already experiencing high levels of night-time economy-related activity.

Duty of the Committee

20. It is the Committee's statutory duty to promote the four licensing objectives set out in the Licensing Act 2003. The four licensing objectives are the legal foundation for all licensing decisions, and as such the authority's legal duty to prevent nuisance, and crime and disorder must be the foremost consideration.
21. Following a request from the Committee, members were provided with a briefing note on the Cumulative Impact Assessment (CIA) and Special Saturation Policy (SSP). Members then provided additional feedback and questions to the Licensing Authority to inform the development of this report.

A copy of the briefing note can be found at **Appendix Three**.

Conclusion

22. The Licensing Authority has a duty to prevent public nuisance and crime or disorder that may result from a high concentration of licensed premises in one area. For this reason, significant weight is given to the views of responsible authorities, particularly the Police who are the lead agency on crime and disorder matters under the Licensing Act 2003.
23. The Licensing Authority has carefully considered consultation responses opposing the SSP and notes the views that Oxford lacks a thriving night-time economy or that continuing the policy will result in widespread business closures. However, there is little evidence to suggest that the SSP is a factor in this matter. Licensing Authority data shows that there is a regular flow of new applications and variations, with 120 licenses assessed between 2022 and 2025, 52 of which were within SSP areas with one refused.
24. The Licensing Act 2003 requires each application to be assessed on its individual merits, irrespective of whether the premises is within an SSP area. The SSP helps to ensure that new or varied licences are granted with reasonable and robust conditions designed to uphold the licensing objectives. In practice, the applications within SSP areas between 2022 and 2025 were subject to such conditions, usually proposed by the applicant following consultation with Thames Valley Police, the Licensing Authority, or other responsible authorities.
25. There are no other legal tools that work in the same way as the Special Saturation Policy. Without it, the Council's ability to uphold the licensing objectives is reduced,

and there is greater reliance on reacting to problems after they occur, rather than preventing them in the first place.

Without an SSP:

- There is no presumption of refusal, even in areas with high levels of crime, nuisance, or public safety concerns.
- Licensing authorities have less scope to require applicants to address pre-existing issues in the area.
- Applicants are only expected to mitigate the direct impact of their own premises, not the cumulative impact of many premises in close proximity.

With an SSP:

- Applicants must mitigate against the broader context, even if they are new to the area and did not contribute to existing problems.
- This allows the Licensing Authority to impose more tailored conditions or refuse applications that do not sufficiently address the cumulative impact.
- It strengthens the authority's ability to protect residents, manage the night-time economy, and uphold the licensing objectives in high-pressure areas.

26. The Licensing Authority has proposed Cumulative Impact Assessment for 2025-2028 considering all the evidence gathered through the consultation period. The assessment sets out that the authority remains of the opinion that:

“...the number of licensed premises and club premises certificates within the City Centre and East Oxford area is such that it is likely that granting further licences or variation to licences would be inconsistent with the authority's duty to promote the licensing objectives...”

This statement is a statutory requirement and does not mean that all new or varied applications will be refused; rather, each application will be considered on its own merits, and applicants will be expected to demonstrate robust measures to uphold the licensing objectives in these areas.

The Cumulative Impact Assessment 2025-2028 can be found at **Appendix Four**.

27. The Committee is requested to recommend to Full Council adoption of the Cumulative Impact Assessment for 2025-2028 which retains the Special Saturation Policy covering City Centre and East Oxford areas.

Financial implications

28. The cost for the consultation and analysis of the data for a CIA will be within the existing budget.

Legal issues

29. Any legal implications are contained within the report.

Equality Impact Assessment

30. The Council has a Public Sector Equality Duty under the Equality Act 2010 to have due regard to the need to:
- Eliminate discrimination, harassment and victimisation and any other conduct that is prohibited by or under the Act;
 - Advance equality of opportunity between people who share a relevant protected characteristic and those who don't share it;
 - Foster good relations between people who share a relevant protected characteristic and those who do not (which involves having due regard, in particular, to the need to tackle prejudice and promote understanding).
31. The protected characteristics are age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex, and sexual orientation.
32. When undertaking the Equality Impact Assessment, the Equality and Human Rights Commission guidance was used along with legislation and consultation responses.

The Equality Impact Assessment can be found at **Appendix Five**.

Environmental Considerations

33. There are no environmental considerations arising from this report.

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Background Papers:	
1	Licensing Act 2003
2	Homepage EHRC

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Licensing Authority

www.oxford.gov.uk



Cumulative Impact Assessment 2022

2022 - 2025



1. Cumulative Impact Assessments – Background

- 1.1 The concept of cumulative impact has been described within the Secretary of State's Guidance since the commencement of the 2003 Act.
- 1.2 The guidance describes cumulative impact as "the potential impact on the promotion of the licensing objectives of a number of licensed premises concentrated in one area".
- 1.3 For clarity, the licensing objectives are:
 - Prevention of crime and disorder
 - Prevention of a public nuisance
 - Public safety
 - Protection of children from harm
- 1.4 The Licensing Authority had previously adopted a Special Saturation Policy within its Statement of Licensing Policy, which covered both Oxford City Centre and East Oxford, adopted following assessment of the particular impact from the concentration of licensed premises in those areas. Due to the effects of the COVID-19 pandemic, the Authority was unable to conduct a Cumulative Impact Assessment when the Statement of Licensing Policy was due to be reviewed in early 2021. The result was that the Special Saturation Policy was removed, with the understanding that it would be reassessed later in the year.
- 1.5 The Policing and Crime Act 2017 amended the Licensing Act 2003 to place 'Cumulative Impact Assessments' on a statutory footing by introducing paragraph 5a of the Licensing Act 2003. This amendment came into force on 6th April 2018.
- 1.6 This Cumulative Impact Assessment is therefore being published under these new provisions of the Licensing Act 2003. The policy will be reviewed no later than every three years from the date it comes into force.
- 1.7 Section 182 Guidance states that "A Cumulative Impact Assessment (CIA) may be published by a licensing authority to help it to limit the number or types of licence applications granted in areas where there is evidence to show that the number or density of licensed premises in the area is having a cumulative impact and leading to problems which are undermining the licensing objectives. CIAs relate to applications for new premises licences and club premises certificates and applications to vary existing premises licences and club premises certificates in a specified area".

2. Consultation

- 2.1 As per section 5a of the Licensing Act 2003, in preparing the Cumulative Impact Assessment the Licensing Authority consulted with the persons mentioned in section 5(3) of the Licensing Act 2003, namely:
 - the Chief Officer of Police
 - the Chief Officer of the Fire and Rescue Service
 - persons/bodies representative of the Local Authority with the function of public health
 - persons/bodies representative of local holders of premises licences
 - persons/bodies representative of local holders of club premises certificates
 - persons/bodies representative of local holders of personal licences
 - persons/bodies representative of businesses and residents in the City of Oxford

- persons/bodies representative of Child Protection Services
- other organisations as appear to the Licensing Authority to be affected by licensing matters, including local community, cultural, educational and entertainment organisations.

2.2 The Licensing Authority considered the views of all those consulted prior to determining this policy.

3. Cumulative Impact Assessment

3.1 The assessment relates to all premises within specified areas that have a premises licence or a club premises certificate which will be carrying on or proposing to carry on the following licensable activities:

- The sale or supply of alcohol on or off the premises
- The provision of late night refreshment on or off the premises

3.2 CIAs do not apply to Temporary Event Notices (TENS); however it is open to the police and environmental health authority (as relevant persons) to refer to evidence published within a CIA when objecting to a TEN.

3.3 While the evidence underpinning the publication of this CIA should generally be suitable as the basis for a decision to refuse an application or impose conditions, it does not change the fundamental way that decisions are made under the 2003 Act. Each decision in an area subject to a CIA therefore still needs to be made on a case-by-case basis and with a view to what is appropriate for the promotion of the licensing objectives. Importantly, the publication of this CIA would not remove the Licensing Authority's discretion to grant applications for new licences or applications to vary existing licences, where the Authority considers this to be appropriate in the light of the individual circumstances of the case.

3.4 It also does not remove the requirement for a relevant representation to be submitted by a responsible authority or a member of the public (defined as 'any other person' within the act) against an application for it to be considered by the Licensing Sub-Committee. An application that does not receive relevant representations is deemed granted under the Act.

3.5 The Licensing Authority's Special Saturation Policy creates a rebuttable presumption that an application within the designated cumulative impact areas for new premises licences or variations that are likely to add to the existing cumulative impact will normally be refused if relevant representations are received. It is for the applicant to demonstrate that their application would not add to the cumulative impact of such licensed premises in the areas. Applicants are encouraged to liaise with the Licensing Authority and other Responsible Authorities in advance of submitting an application.

3.6 The steps followed in considering whether to publish a CIA are summarised below:

- identify concern about crime and disorder; public safety; public nuisance or protection of children from harm in a particular location.
- Consider whether there is good evidence that crime and disorder or nuisance are occurring, or whether there are activities which pose a threat to public safety or the protection of children from harm.
- if there is evidence that such problems are occurring, identify whether these problems are being caused by the customers of licensed premises, or that cumulative impact is imminent.

- Identify the boundaries of the area where problems are occurring (this can involve mapping where the problems occur and identifying specific streets or localities where such problems arise).
- Consult those specified in section 5(3) of the 2003 Act. As with consultations in respect of the licensing policy statement as a whole, it is for each licensing authority to determine the extent of the consultation it should undertake in respect of a CIA (subject to the statutory requirements).

3.7 The Licensing Authority had previously adopted a special policy on cumulative effect, known as its Special Saturation Policy, and it is now being readopted following this Cumulative Impact Assessment.

4. Cumulative Impact Assessment Statement

4.1 This assessment is being published because the authority is of the opinion that the number of licensed premises and club premises certificates within the City Centre and the East Oxford area is such that it is likely that granting further licences or variation to licences would be inconsistent with the authority's duty to promote the licensing objectives. This opinion has been reached after careful consideration of evidence and data, from Thames Valley Police, the Responsible Authorities and other persons, which show high levels of public nuisance, anti-social behaviour and crime and disorder within these areas. Therefore it is appropriate and necessary to control the cumulative impact in these areas.

The areas covered by the policy are the City Centre, as shown in **Appendix One**, and East Oxford, predominately Cowley Road, as shown in **Appendix Two**.

The evidential basis for the decision to publish a Cumulative Impact Assessment is set out in **Appendix Three**.

In areas where there is an excessive accumulation of off and on licensed premises, it is relatively straight forward to provide a direct correlation between those premises and public nuisance, anti-social behaviour and crime and disorder in the area, through an analysis of the evidence including operating hours of the premises and the peak times for incidents and calls for service.

5. Other mechanisms for controlling cumulative impact

5.1 There are mechanisms and interventions, both within and outside the licensing regime, that are available for mitigating adverse impacts on the licensing objectives and should be considered alongside local licensing policy by the Licensing Authority, Responsible Authorities, other persons, licensed premises and new and existing applicants: For example:

- planning controls
- positive measures to create a safe and clean environment in partnership with local businesses, transport operators and others
- the provision of CCTV,
- ample taxi ranks and Private Hire Companies licensed within district
- powers to designate parts of the city as places where alcohol may not be consumed publicly-Public Space Protection Orders.
- confiscation of alcohol from adults and children in designated areas
- police enforcement of the law with regard to disorder and anti-social behaviour, including the issuing of fixed penalty notices
- enforcement action against those selling alcohol to people who are inebriated

- police powers to close some premises for up to 24 hours on the grounds of disorder, the likelihood of disorder or excessive noise
- the power of police, local businesses or residents to seek a review of the licence or certificate

Appendix One – Cumulative Impact Area – Oxford City Centre



Appendix Two – Cumulative Impact Area – East Oxford



Appendix Three – Cumulative Impact Evidence

Contents

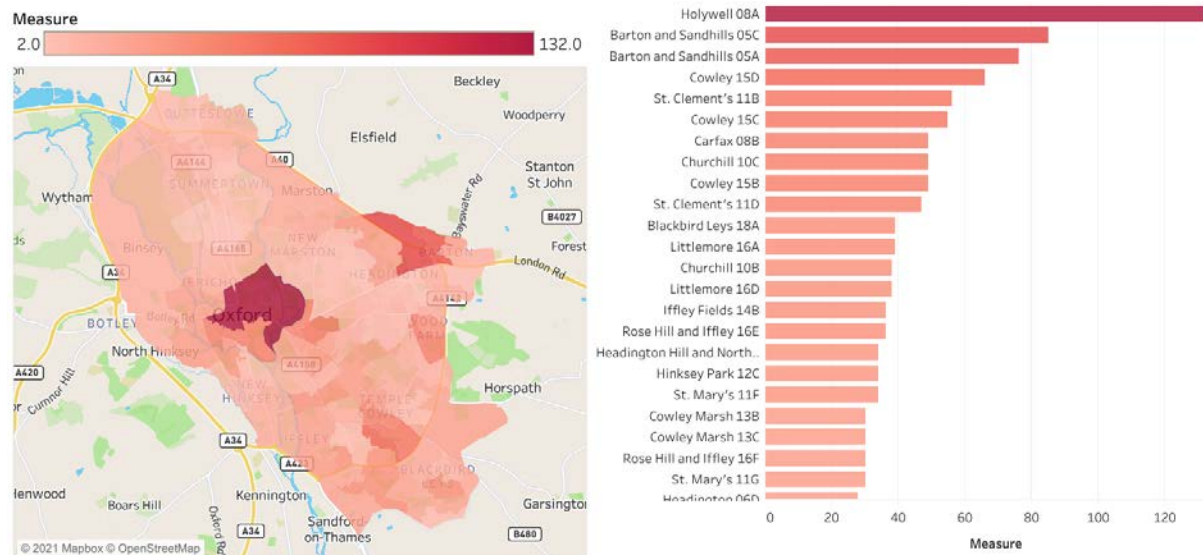
1. Police ASB incidents 2020 – LSOA level
2. Police Criminal damage crimes 2020 – LSOA level
3. Police Public Order crimes 2020 – LSOA level
4. Police Violent crime and sexual offences 2020 – LSOA level
5. Seasonal trends of top-4 LSOAs
6. CCTV incidents
7. Police data analysis methodology
8. Temporal analysis
9. Seasonal analysis
10. Geographic distribution: all NTE occurrences
11. Geographical distribution: serious violence occurrences
12. Public Health data – alcohol related admissions and mortality rates

Glossary

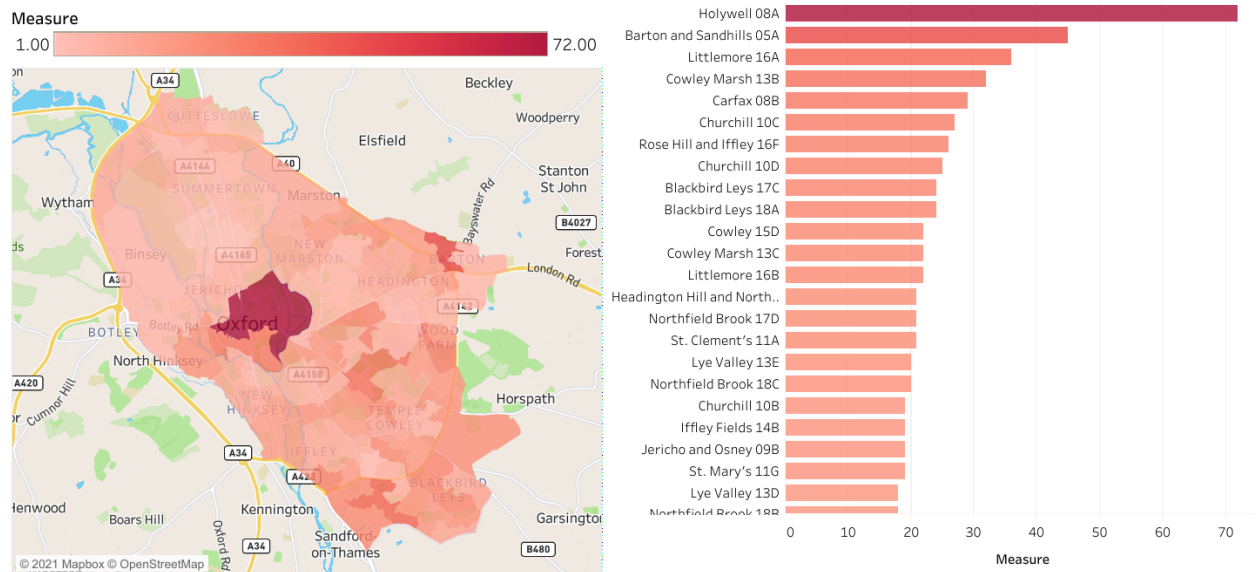
LSOA – Lower Super Output Area

ASB – Anti-social Behaviour

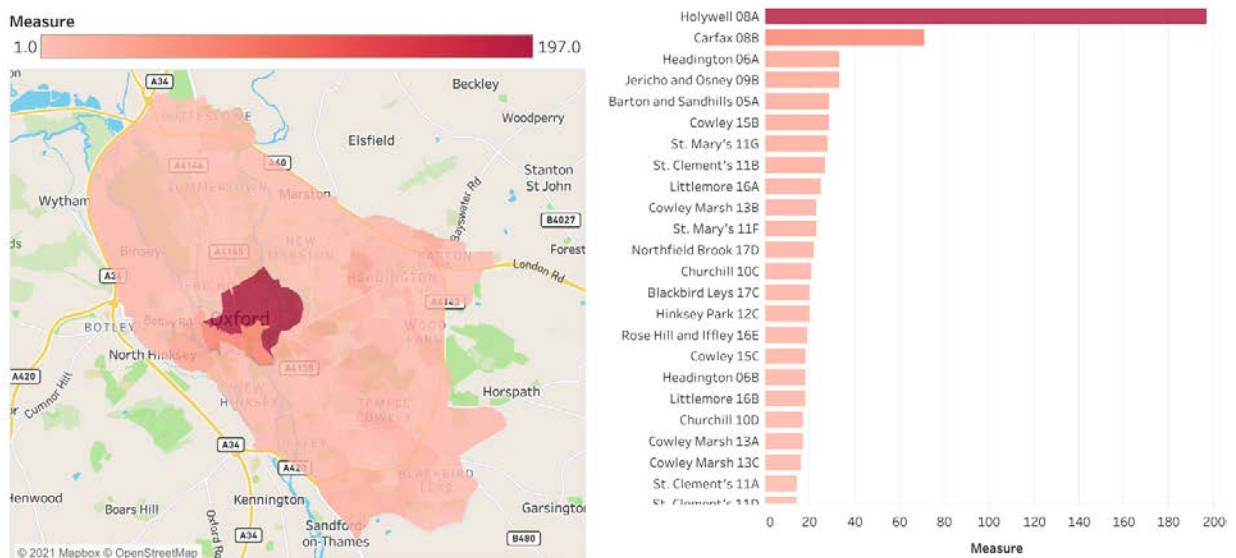
1. Police ASB incidents 2020 – LSOA level



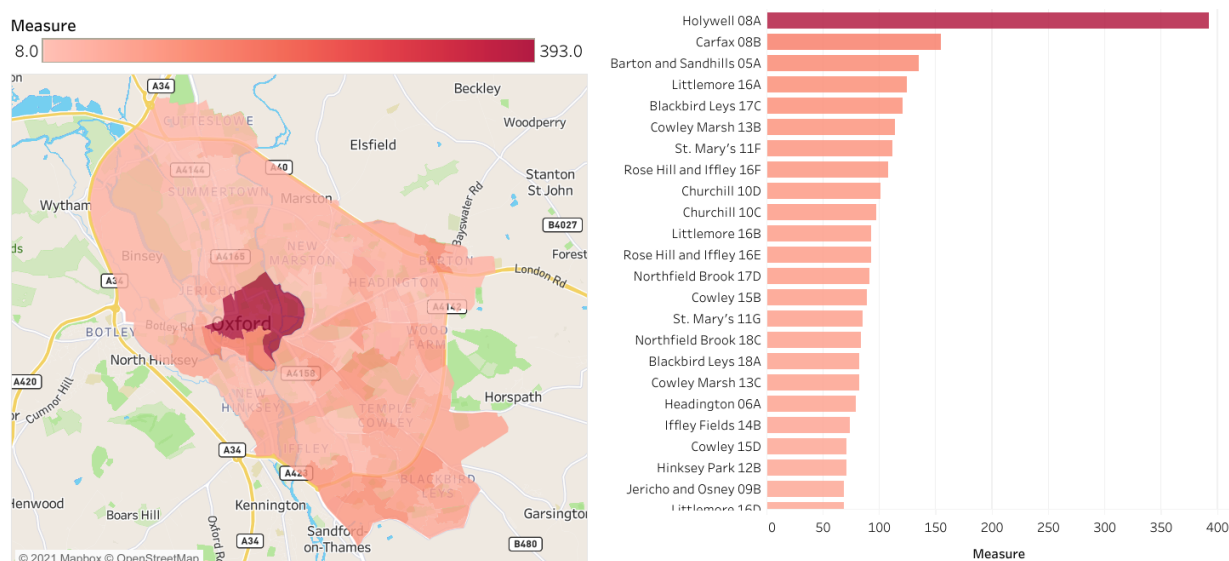
2. Police criminal damage and arson crimes 2020 – LSOA level



3. Police Public Order crimes 2020 – LSOA level



4. Police Violent crime and sexual offences 2020 – LSOA level



5. Police crime trend data – top 4 LSOAs

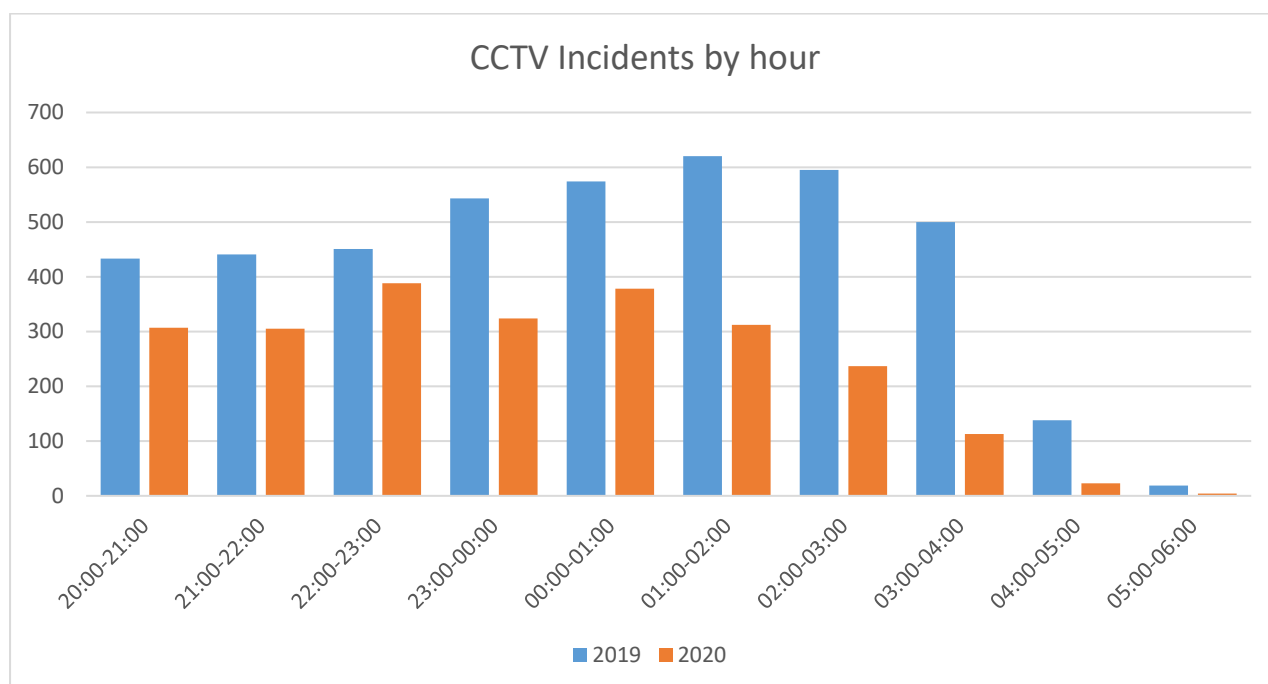
ASB incidents	2018		2019				2020				2021		Total
	Jul - Sept	Oct - Dec	Jan - Mar	Apr - Jun	Jul - Sept	Oct - Dec	Jan - Mar	Apr - Jun	Jul - Sept	Oct - Dec	Jan - Mar	Apr - Jun	
Holywell 08A	73	83	66	72	48	52	38	21	30	43	22	43	591
Barton and Sandhills 05A	18	14	13	24	28	18	8	25	20	23	16	13	220
St. Clement's 11D	36	44	18	12	26	7	10	8	14	15	6	11	207
Carfax 08B	31	20	27	22	19	9	16	9	11	13	4	10	191

Criminal damage & arson	2018		2019				2020				2021		Total
	Jul - Sept	Oct - Dec	Jan - Mar	Apr - Jun	Jul - Sept	Oct - Dec	Jan - Mar	Apr - Jun	Jul - Sept	Oct - Dec	Jan - Mar	Apr - Jun	
Holywell 08A	32	43	23	36	26	16	23	11	14	24	11	17	276
Barton and Sandhills 05A	9	5	6	12	12	4	13	12	13	7	9	11	113
Littlemore 16A	14	7	9	6	14	4	6	13	5	12	5	6	101
Carfax 08B	17	10	9	9	5	7	3	7	10	9	8	4	99

Public order	2018		2019				2020				2021		Total
	Jul - Sept	Oct - Dec	Jan – Mar	Apr – Jun	Jul - Sept	Oct - Dec	Jan – Mar	Apr – Jun	Jul - Sept	Oct - Dec	Jan – Mar	Apr – Jun	
Holywell 08A	56	48	49	57	37	55	54	24	59	60	61	97	657
Carfax 08B	14	18	13	17	20	15	24	8	13	26	15	18	201
Jericho and Osney 09B	2	2	1	4	3	2		9	11	13	24	22	93
St. Mary's 11G	6	2	2	9	8	6	9	4	9	6	9	15	85

Violence & sexual	2018		2019				2020				2021		Total
	Jul - Sept	Oct - Dec	Jan – Mar	Apr – Jun	Jul - Sept	Oct - Dec	Jan – Mar	Apr – Jun	Jul - Sept	Oct - Dec	Jan – Mar	Apr – Jun	
Holywell 08A	176	187	175	136	171	183	161	56	94	82	56	130	1607
Carfax 08B	29	36	35	30	38	39	39	24	44	48	31	67	460
Barton and Sandhills 05A	32	22	23	22	36	26	29	35	39	32	27	49	372
Littlemore 16A	24	35	34	27	39	17	35	34	26	30	27	31	359

6. CCTV incidents



The graph illustrates the peak hours of incidents monitored by public space CCTV cameras in the city. It is not possible to disaggregate the small number of cameras in neighbourhood areas from the cameras in the city centre.

This hourly breakdown is clearly linked to public space incidents during the night-time economy period.

7. Police Analysis of Violent Crime in the NTE: Methodology

Data from the police occurrence record keeping system for occurrences taking place within the Oxford Local Police Area with a reported date between 01/01/2017 and 26/04/2021 and with the Home Office Statistics Code 1 representing Violence Against the Person or Disorder.

Cancelled, historic or occurrences where the date was unknown were removed from the data set.

VAP and Disorder are very broad categories and include many occurrences unrelated to the NTE, attempts were made to refine the focus of the data by removing occurrences where the Location was recorded as a Dwelling or using the following criteria:

The data set resulting from the described initial search and filtering criteria comprised 4,523 occurrences which were considered to be related to Oxford's Night Time Economy. This data set was then analysed using Microsoft Excel and Esri ArcMap.

8. Police Analysis of Violent Crime in the NTE: Temporal Distribution

The temporal distribution of the 4,514 occurrences for which a time could be determined is shown below. It should be noted that 314 of these had an Event Start Time recorded as 00:00 – upon further investigation 305 of these were changed to a more accurate time based on Recorded Time, Event End Time and times noted in the summary report.

Fig. 1

	00:00 - 01:00	01:00 - 02:00	02:00 - 03:00	03:00 - 04:00	04:00 - 05:00	05:00 - 06:00	..	21:00 - 22:00	22:00 - 23:00	23:00 - 00:00	Grand Total
Monday	44	43	38	40	21	3		71	86	62	408
Tuesday	39	33	50	69	21	3		102	77	85	479
Wednesday	45	42	30	41	24			102	94	72	450
Thursday	60	44	61	42	18	4		99	61	68	457
Friday	52	47	64	56	29	3		94	114	122	581
Saturday	115	131	143	165	78	6		113	125	141	1017
Sunday	147	216	202	210	98	5		88	80	76	1122
	502	556	588	623	289	24		669	637	626	4514

Figure 1: Distribution of occurrences by time and day of week

Shows what we might expect intuitively: almost half (47%) of occurrences linked to Oxford's NTE occur on either a Saturday or a Sunday. The busiest period is between 01:00 and 04:00 on a Sunday morning, with those 3 hours alone accounting for 14% of occurrences analysed.

Fig. 2

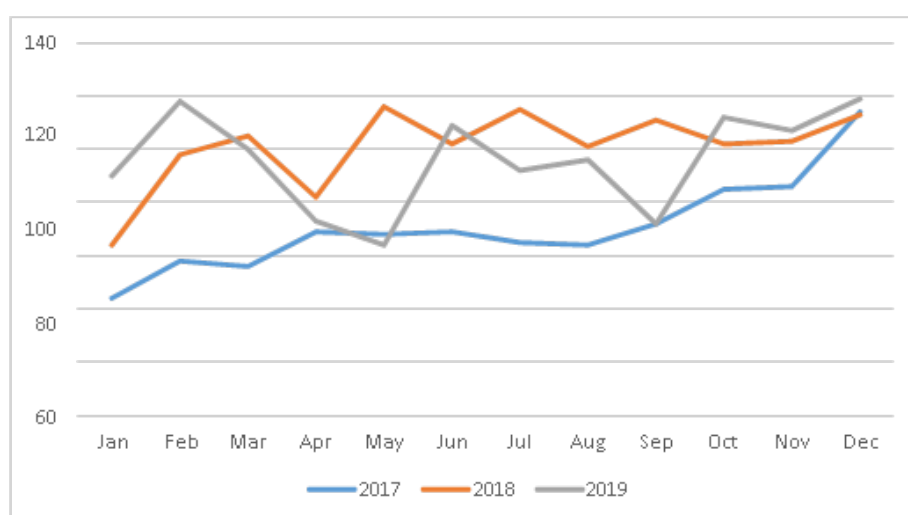
	00:00 - 01:00	01:00 - 02:00	02:00 - 03:00	03:00 - 04:00	04:00 - 05:00	05:00 - 06:00	..	21:00 - 22:00	22:00 - 23:00	23:00 - 00:00	Grand Total
Monday	12	9	7	5	5	1		3	4	3	49
Tuesday	11	6	12	18	16	8		2	5	7	85
Wednesday	7	8	5	5	3	3		2	2	7	42
Thursday	13	10	13	9	15	3		6	2	5	76
Friday	6	12	7	8	10	2		11	7	5	68
Saturday	15	27	32	28	40	16		10	5	14	187
Sunday	18	59	52	41	59	22		6	3	7	267
	82	131	128	114	148	55		40	28	48	774

Figure 2: Distribution of NTE-related hospitalisations to John Radcliffe A&E by time and day of week

Shows the distribution of admissions to the Accident & Emergency department of the John Radcliffe hospital between August 2017 and August 2020 which were classified as Apparent Assaults in which alcohol was believed to be a factor. The distribution largely mirrors the conclusion drawn from analysis of the temporal distribution of NTE-linked occurrences in Oxford, with an even greater focus on the early hours of Sunday morning (and to a lesser extent of Saturday morning).

9. Police Analysis of Violent Crime in the NTE: Seasonality

The count of NTE-linked occurrences taking place in each month of 2017, 2018, and 2019 is illustrated below. The chart does not suggest any great degree of predictable seasonality, although it appears that occurrence counts in November and December may be particularly high. These monthly counts were then compared to the expected level (based on the 12 month centred moving average) to determine whether any months appeared to have occurrence counts consistently above the expected count.



Month	2017	2018	2019
Jan	-27	-28	-8
Feb	-13	3	20
Mar	-15	7	6
Apr	-2	-18	-22
May	-3	15	-32
Jun	-2	1	13
Jul	-8	12	-6
Aug	-12	-4	-2
Sep	-8	7	-25
Oct	4	-2	18
Nov	1	4	13
Dec	26	13	28

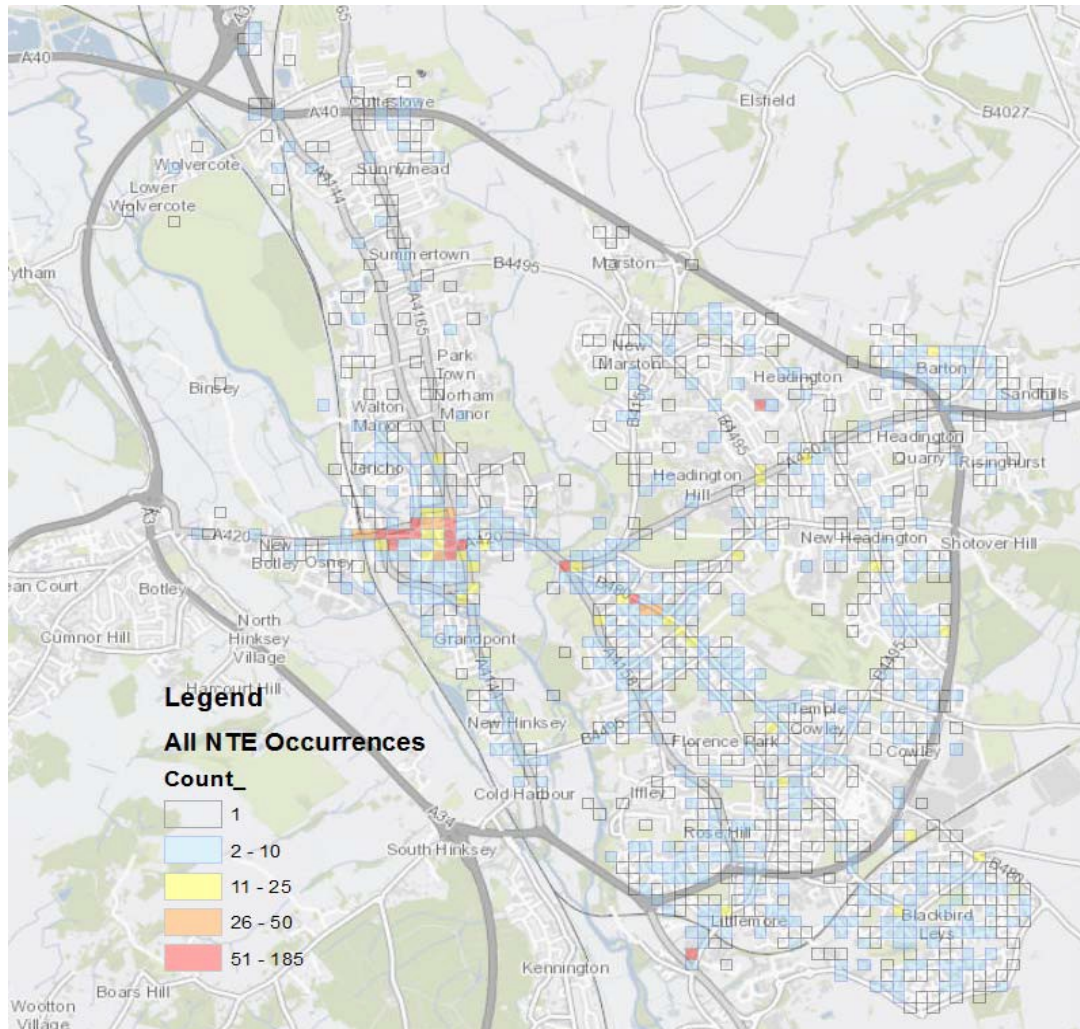
This analysis accounts for changing trends (2017 saw a steadily rising number of monthly occurrence counts, leading to consistently higher levels in 2018). It clearly shows that December NTE-linked occurrence counts were higher than expected in every year from 2017 to 2019, and that January occurrence counts were lower than expected in every year. April and August were also consistently lower than expected, albeit to a lesser extent than January, and November was also associated with marginally higher than expected NTE occurrence counts.

10. Police Analysis of Violent Crime in the NTE: Geographic distribution

The following heat maps show locations of NTE occurrences in Oxford, using a 100m x 100m grid overlaid on a map of the police area with the count of occurrences recorded as taking place within each grid square being indicated by the colour of the square.

The map clearly indicates that the most notable areas in which NTE occurrences have taken place are: the city centre area focused on Park End Street, Hythe Bridge Street and Cornmarket; Magdalen roundabout, the Cowley Road between Union



Street and East Avenue (O2 Academy and Cowley Retreat area); the A&E department of the John Radcliffe Hospital; and the Littlemore Mental Health Centre. It is possible (although not confirmed) that the hospital events may include occurrences that took place elsewhere and were reported from the hospital location.



11. Police Analysis of Violent Crime in the NTE: Geographic distribution

Serious violence offences.

Serious violence in Oxford's NTE appears to be highly focused in city centre areas, in particular: Queen Street / Cornmarket Street and Park End Street / Hythe Bridge Street.

Hospital admissions of alcohol related cardiovascular disease (female)	2018/19	776	613	791 
Hospital admissions for mental and behavioural disorders due to alcohol	2018/19	75.6	52.2	97.9 
Hospital admissions for alcoholic liver disease	2018/19	131.2	96.0	138.4 

Source: PHE: Population Health Analysis (PHA) team using data from NHS Digital and ONS

The trend for hospital admissions for alcohol related conditions is increasing. There is also an increase in the trend for hospital admissions for alcohol related cardiovascular diseases.

APPENDIX TWO

43

In what capacity are you responding to this survey? - capacity	In what capacity are you responding to this survey? - If 'other', please specify:	To what extent do you agree or disagree with keeping the current Special Saturation Policy area in Central Oxford (City Centre) ? - SSP central Oxford	What is your main concern regarding the night-time economy in Central Oxford (City Centre), such as issues related to violence, drunken behaviour, or safety when getting home? - Please share your primary concern in the comment box below.	To what extent do you agree or disagree with keeping the current Special Saturation Policy area in East Oxford? - SSP East Oxford	What is your main concern regarding the night-time economy in East Oxford, such as issues related to violence, drunken behaviour, or safety when getting home? - Please share your primary concern in the comment box below.	Would you like to upload any evidence demonstrating that the high number or density of licensed premises in this area is having a detrimental effect on one or more of the licensing objectives? - Please make sure your file is under 10MB	Which of the following best describes how you think of yourself? - Sex	Which age bracket do you fall into? - Age	Are your day to day activities limited because of a health problem or disability that has lasted, or is expected to last, at least 12 months? - Disability	Which of the following best describes your ethnicity? - Ethnicity
Other	Local Authority Fire Service	Agree	1. Violence and Anti-Social Behaviour Alcohol-Related Incidents: High concentrations of bars and clubs can lead to increased incidents of violence and anti-social behaviour. Public Disorder: Large crowds can sometimes result in fights or disturbances, especially late at night. 2. Drunken Behaviour Noise and Disturbances: Drunken behaviour can lead to noise and disturbances, affecting the quality of life for local residents. Vandalism: There can be an increase in vandalism and property damage due to intoxicated individuals. 3. Safety When Getting Home Personal Safety: Concerns about personal safety, especially for women and vulnerable individuals, when traveling home late at night. Transport Availability: Limited availability of safe and reliable transport options late at night can be a concern.	Agree	1. Violence and Anti-Social Behaviour Alcohol-Related Incidents: High concentrations of bars and clubs can lead to increased incidents of violence and anti-social behaviour. Public Disorder: Large crowds can sometimes result in fights or disturbances, especially late at night. 2. Drunken Behaviour Noise and Disturbances: Drunken behaviour can lead to noise and disturbances, affecting the quality of life for local residents. Vandalism: There can be an increase in vandalism and property damage due to intoxicated individuals. 3. Safety When Getting Home Personal Safety: Concerns about personal safety, especially for women and vulnerable individuals, when traveling home late at night. Transport Availability: Limited availability of safe and reliable transport options late at night can be a concern.	Not Answered	Male	45-54	No	White – English/Welsh/Scottish/Northern Irish/British
A resident of Oxford		Agree	Violent assaults	Strongly agree	Drunken behaviour, noise, concerns about safety, particularly if lighting is decreased	Not Answered	Female	65-74	Yes, limited a lot	White – English/Welsh/Scottish/Northern Irish/British
A resident of Oxford		Neither agree nor disagree	As an Oxford resident, I want to be sure that I can travel through the night-time economy in Central Oxford safely and that vulnerable groups, such as those who are rough sleeping, are also kept safe.	Neither agree nor disagree		Not Answered	Male	25-34	Yes, limited a little	White – English/Welsh/Scottish/Northern Irish/British
Local business owner/manager who holds a premises licence		Strongly disagree	I have no major concerns regarding the NTE.	Strongly disagree	No major concerns in this area outside of drunken use of the e-scooters (voi)	Not Answered	Male	25-34	No	White – English/Welsh/Scottish/Northern Irish/British
Local business owner/manager who holds a premises licence		Strongly agree	We are best away from the city centre but when I personally went into Oxford late at night there was a good police presence which made me feel safer	Strongly agree	I believe it's good to have a policy in place which we have to uphold to	Not Answered	Female	45-54	No	White – English/Welsh/Scottish/Northern Irish/British
Local business owner/manager who holds a premises licence		Neither agree nor disagree	the trade is so low nowadays that the landscape has changed dramatically in the last 3 years so I think updated reports on all aspect of the saturation policy should be reviewed	Neither agree nor disagree	the volumes have dropped as far as we are concerned and we believe so did drunken behaviour	Not Answered	Male	45-54	No	Other Ethnic Group – Any other ethnic group
A resident of Oxford		Neither agree nor disagree	I don't have any concerns.	Neither agree nor disagree	I don't have any concerns	Not Answered	Female	55-59	Yes, limited a little	White – English/Welsh/Scottish/Northern Irish/British
A resident of Oxford		Strongly disagree	No issues. I am disappointed in the number of late night venues closing and the city's position as an appealing option for those choosing to study here for university. Hospitality is good for jobs and culture!	Strongly disagree	As above.	Not Answered	Male	25-34	No	White – English/Welsh/Scottish/Northern Irish/British
A person who works in Oxford		Strongly disagree		Strongly disagree		Not Answered	Male	20-24	No	White – English/Welsh/Scottish/Northern Irish/British
A resident of Oxford		Strongly disagree	It's ridiculous, you need to allow businesses to be flexible to survive, look at the stress of running a business with the upcoming pay rises in April. Councils need to stand down and support businesses and their enterprises, Oxford depends on it and you doing the right thing. As long as they are safe and legal and following protocol.	Strongly disagree	There is no concern you need to do more to support businesses.	Not Answered	Male	25-34	No	White – English/Welsh/Scottish/Northern Irish/British
A person who works in Oxford		Strongly disagree		Strongly disagree		Not Answered	Male	20-24	No	White – English/Welsh/Scottish/Northern Irish/British
A resident of Oxford		Strongly disagree	My main concern is having a thriving economy! Safety should be a concern, but is something the city can/should address with proper policing, street lighting, and safe transportation – not restricting the economy.	Strongly disagree	My main concern is as above -- having a thriving economy.	Not Answered	Female	25-34	No	White – Other

A resident of Oxford		Strongly disagree		Strongly disagree		Not Answered	Male	45-54	No	White – English/Welsh/Scottish/Northern Irish/British
A resident of Oxford		Strongly disagree		Strongly disagree		Not Answered	Not Answered	Not Answered	Not Answered	Not Answered
Local business owner/manager who holds a premises licence		Neither agree nor disagree	None	Neither agree nor disagree	None	Not Answered	Male	45-54	No	Asian / Asian British – Other
A person who works in Oxford		Strongly disagree		Strongly disagree		Not Answered	Not Answered	Not Answered	Not Answered	Not Answered
			social behaviour and nuisance as well as safeguarding of the vulnerable and violence against women and girls (VAWG) stemming from the night time economy has a significant impact on the police. It uniquely requires a specific policing operation and additional resources (something that is not done for any other time of the day or day of the week), all of which pulls the police away from our duty to the overall policing of Oxford as a whole and indeed supporting the other areas of the Thames Valley should a critical incident occur. The further provisions of licensable activities in the area, whether that is through new premises or later hours for alcohol, or late night refreshment venues/vans which in themselves operate as hot spots for alcohol related violence due to the congregation of intoxicated persons after the clubs and bars have shut, has been shown to exacerbate the significant demand on the police. It is only through the consistent and robust application of the SSP by the							
Other	Thames Valley Police	Strongly agree		Strongly agree	Alcohol related crime, disorder, anti-social	Not Answered	Male	45-54	Yes, limited a lot	White – English/Welsh/Scottish/Northern Irish/British
A resident of Oxford		Strongly disagree		Strongly disagree		Not Answered	Female	25-34	No	White – English/Welsh/Scottish/Northern Irish/British
A resident of Oxford		Strongly disagree		Strongly disagree		Not Answered	Female	20-24	No	White – English/Welsh/Scottish/Northern Irish/British
A resident of Oxford		Strongly disagree		Strongly disagree		Not Answered	Male	25-34	No	White – English/Welsh/Scottish/Northern Irish/British
A person who works in Oxford		Strongly disagree	The night time economy in Oxford is in decline and continuing with this current policy will lead to multiple businesses having to close. Daytime trade is not sustainable for many licensed businesses in the city as well as other businesses open late into the night. In a town that is mostly students it should be an area in which the council should be looking to push trade not decrease it	Strongly disagree	There are very few issues in Oxford related to late night licensed premises and keeping people in a venue where staff have a duty of care is going to help reduce the issues instead of closing licensed venues early causing people to drink without anyone looking out for them	Not Answered	Male	20-24	No	White – English/Welsh/Scottish/Northern Irish/British
A person who works in Oxford		Strongly disagree		Strongly disagree		Not Answered	Female	20-24	No	White – English/Welsh/Scottish/Northern Irish/British
A resident of Oxford		Strongly disagree		Strongly disagree		Not Answered	Male	20-24	No	White – English/Welsh/Scottish/Northern Irish/British
Other	Retired resident of Kidlington who spends a lot of time in Oxford n	Strongly disagree	I don't think Oxford has a major problem late at night. My concern is that the current policy is overly restrictive on businesses.	Neither agree nor disagree	Don't know. I'm rarely in East Oxford in the evening.	Not Answered	Male	55-59	No	White – English/Welsh/Scottish/Northern Irish/British
A resident of Oxford		Strongly agree	The queuing on pavements means it's more difficult to walk past busy venues.	Strongly agree	As above	Not Answered	Male	65-74	No	White – English/Welsh/Scottish/Northern Irish/British
Local business owner/manager who holds a premises licence		Neither agree nor disagree	My premises is not in the city centre so it does does impact me directly	Disagree	We do not find any issues regarding Violence or drunken behaviour in the part of East Oxford that we are based	Not Answered	Female	55-59	No	White – Other
Local business owner/manager who does not hold a premises licence		Strongly disagree	Closure of bars forces overcrowding in small venues.	Strongly disagree	Prevalence of spiking is tarnishing reputation and also bars closing is forcing overcrowding	Not Answered	Male	20-24	No	Asian / Asian British – Indian
A resident of Oxford		Strongly agree	Drunken and sometimes threatening behaviour	Strongly agree	Noise resulting from drunken behaviour	Not Answered	Not Answered	Not Answered	Not Answered	Not Answered
A resident of Oxford		Agree	Drunken behaviour and safety	Agree	Drunken behaviour and safety	Not Answered	Female	Prefer not to say	No	White – English/Welsh/Scottish/Northern Irish/British
Local business owner/manager who holds a premises licence		Agree	The lack of consistency in CCTV coverage of central areas within Oxford City Centre. I can't speak for East Oxford, however quite regularly some/all camera servers are down. Coverage could also be better in locations such as around the sides of the Westgate towards Paradise Street & Paradise Square which is regularly used as a cut through/escape route when police are in attendance on Castle Street or New Street	Neither agree nor disagree	N/A	Not Answered	Male	25-34	No	White – English/Welsh/Scottish/Northern Irish/British

A resident of Oxford		Disagree	More police presence on the streets in the late part of the evening	Disagree	Again more police presence	Not Answered	Male	35-44	No	White – Other
			I find walking through Central Oxford to get home at night threatening even when it is not very late and I would not be willing to do so alone. With ever increasing numbers of food and drink establishments taking up large parts of the pavement it is difficult to avoid large noisy groups of people who have often clearly been drinking and behave unpredictably.							
A resident of Oxford		Strongly agree		Neither agree nor disagree	I have no experience of East Oxford at night.	Not Answered	Female	75+	Yes, limited a little	Prefer not to say
Local business owner/manager who holds a premises licence		Strongly disagree	CIL is inhibiting premises from adapting to changing consumer behaviour and economic pressures.	Neither agree nor disagree		https://consultation.oxford.gov.uk/co	Male	45-54	No	Mixed/ Multiple Ethnic Groups – White and Black African

Cumulative Impact Assessment Review

<https://consultation.oxford.gov.uk/community-services/cumulative-impact-assessment-review>

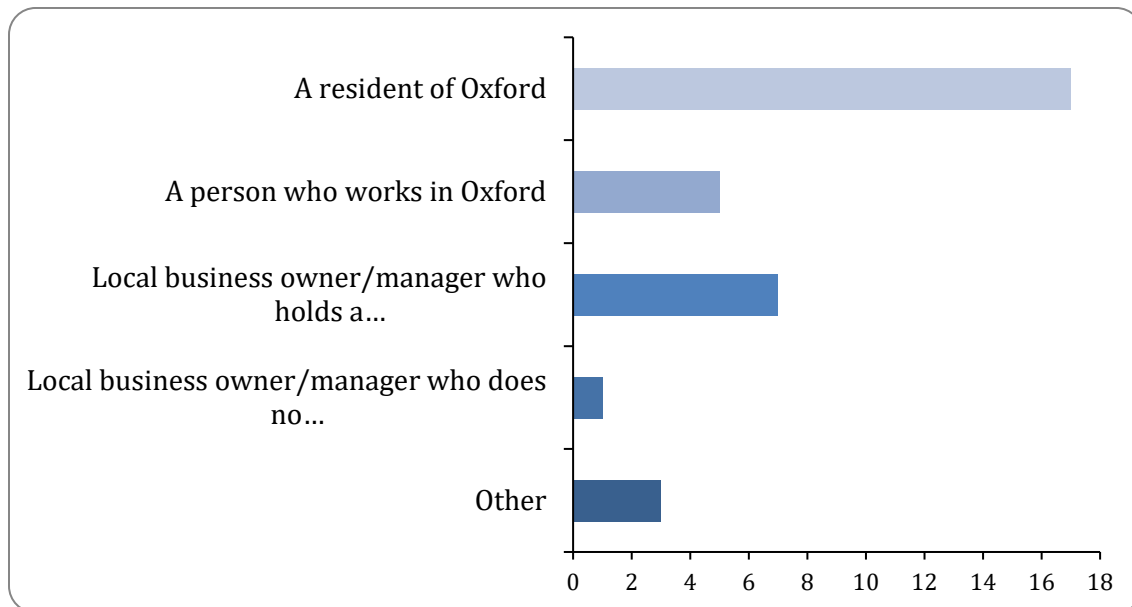
This report was created on Tuesday 22 April 2025 at 13:47

The activity ran from 17/02/2025 to 21/04/2025

Responses to this survey: **33**

1: In what capacity are you responding to this survey? capacity

There were 33 responses to this part of the question.



Option	Total	Percent
A resident of Oxford	17	51.52%
A person who works in Oxford	5	15.15%
Local business owner/manager who holds a premises licence	7	21.21%
Local business owner/manager who does not hold a premises licence	1	3.03%
A trade representative	0	0.00%
A local community group representative	0	0.00%

A local Councillor or MP	0	0.00%
Other	3	9.09%
Not Answered	0	0.00%

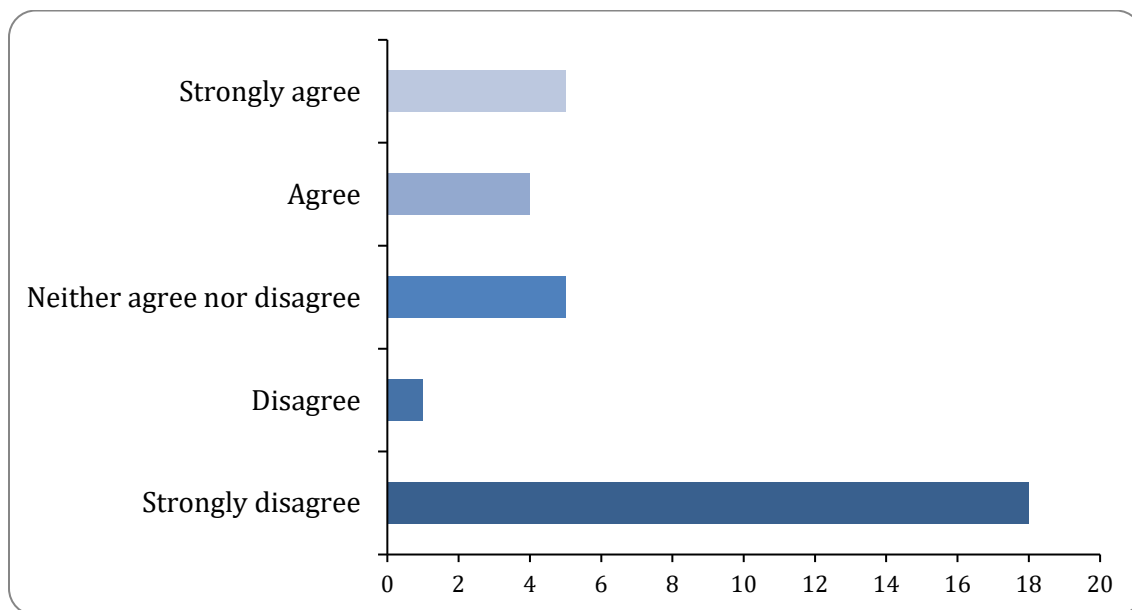
If 'other', please specify:

There were 3 responses to this part of the question.

2: To what extent do you agree or disagree with keeping the current Special Saturation Policy area in Central Oxford (City Centre) ?

SSP central Oxford

There were 33 responses to this part of the question.



Option	Total	Percent
Strongly agree	5	15.15%
Agree	4	12.12%
Neither agree nor disagree	5	15.15%
Disagree	1	3.03%
Strongly disagree	18	54.55%
Not Answered	0	0.00%

3: What is your main concern regarding the night-time economy in Central Oxford (City Centre), such as issues related to violence, drunken behaviour, or safety when getting home?

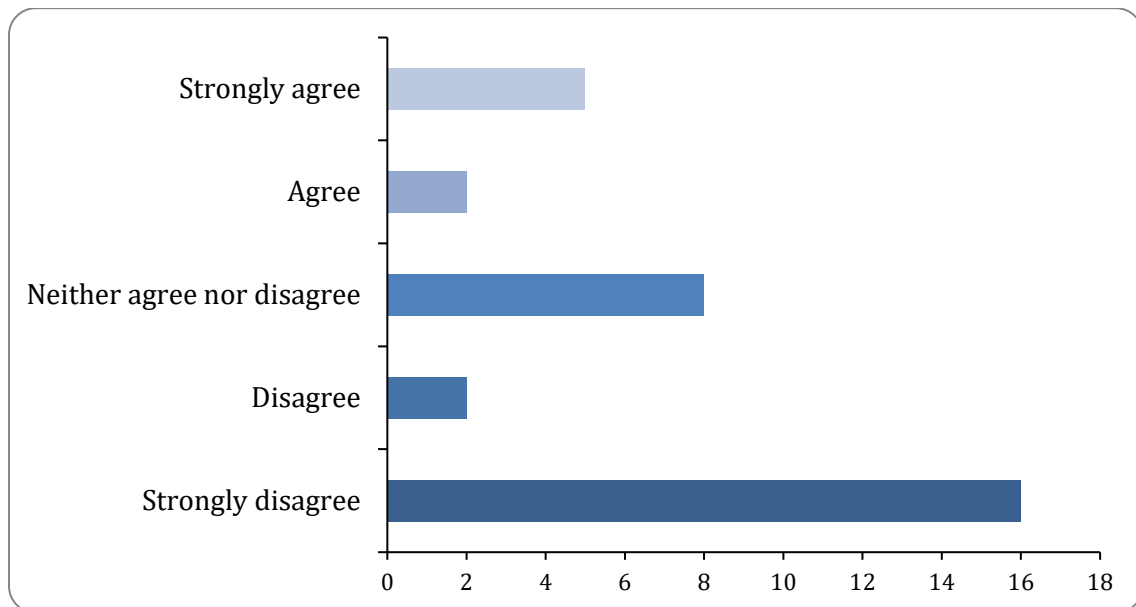
Please share your primary concern in the comment box below.

There were 23 responses to this part of the question.

4: To what extent do you agree or disagree with keeping the current Special Saturation Policy area in East Oxford?

SSP East Oxford

There were 33 responses to this part of the question.



Option	Total	Percent
Strongly agree	5	15.15%
Agree	2	6.06%
Neither agree nor disagree	8	24.24%
Disagree	2	6.06%
Strongly disagree	16	48.48%
Not Answered	0	0.00%

5: What is your main concern regarding the night-time economy in East Oxford, such as issues related to violence, drunken behaviour, or safety when getting home?

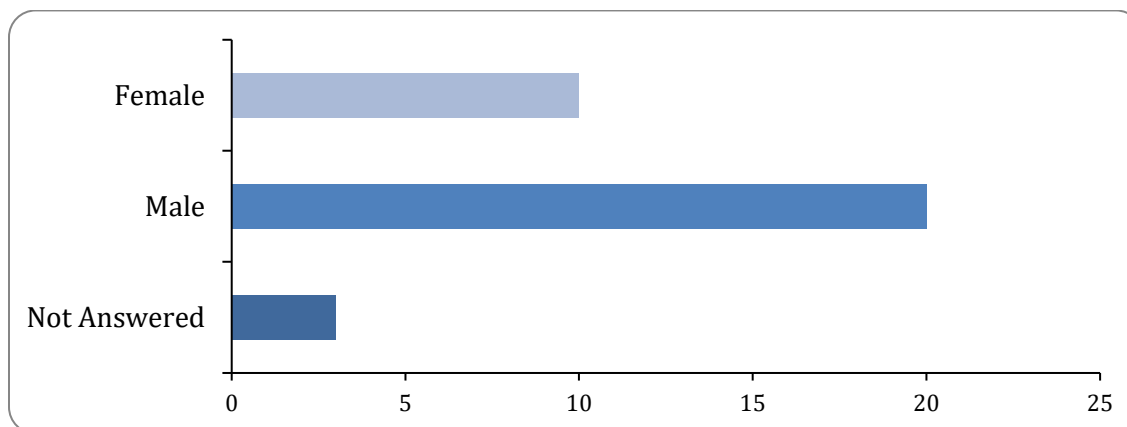
Please share your primary concern in the comment box below.

There were 21 responses to this part of the question.

7: Which of the following best describes how you think of yourself?

Sex

There were 30 responses to this part of the question.

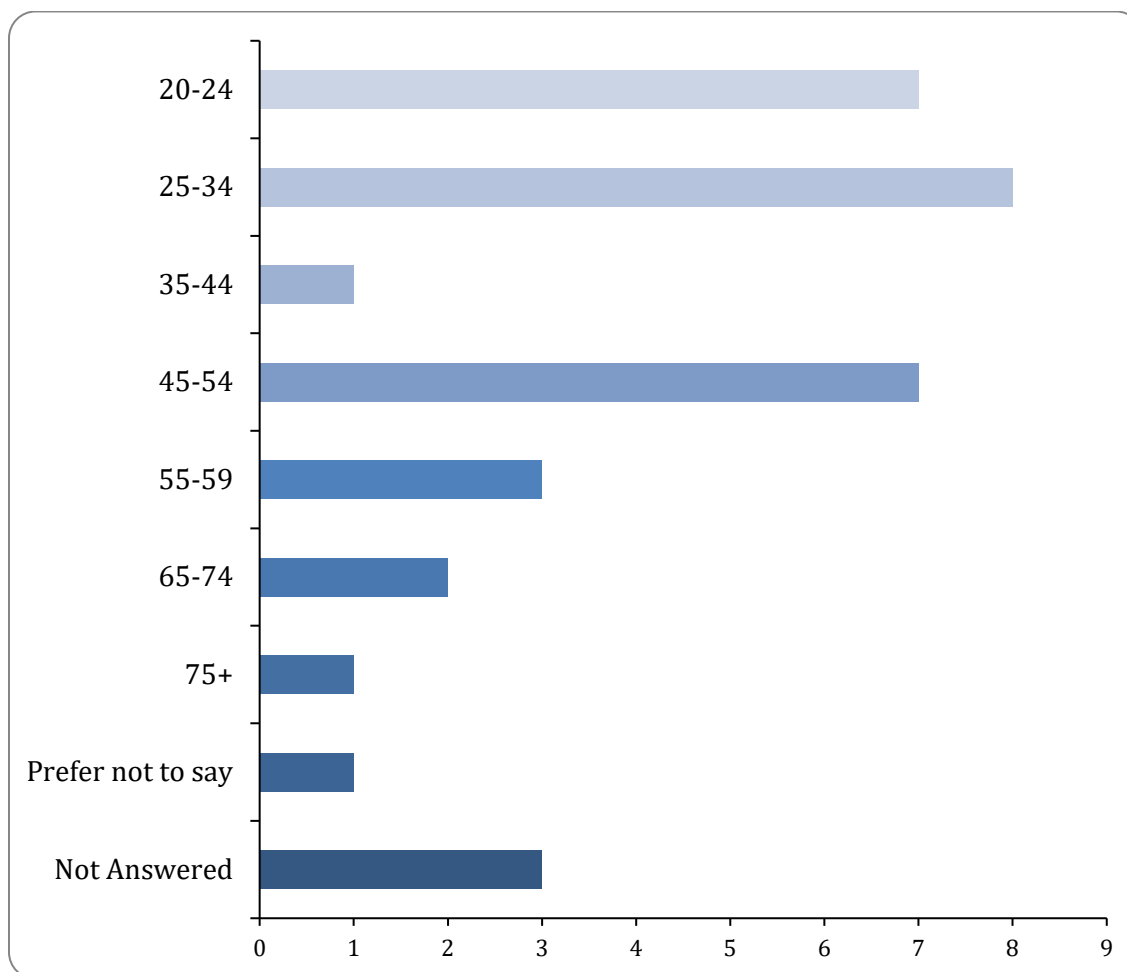


Option	Total	Percent
Female	10	30.30%
Male	20	60.61%
In another way	0	0.00%
Prefer not to say	0	0.00%
Not Answered	3	9.09%

8: Which age bracket do you fall into?

Age

There were 30 responses to this part of the question.

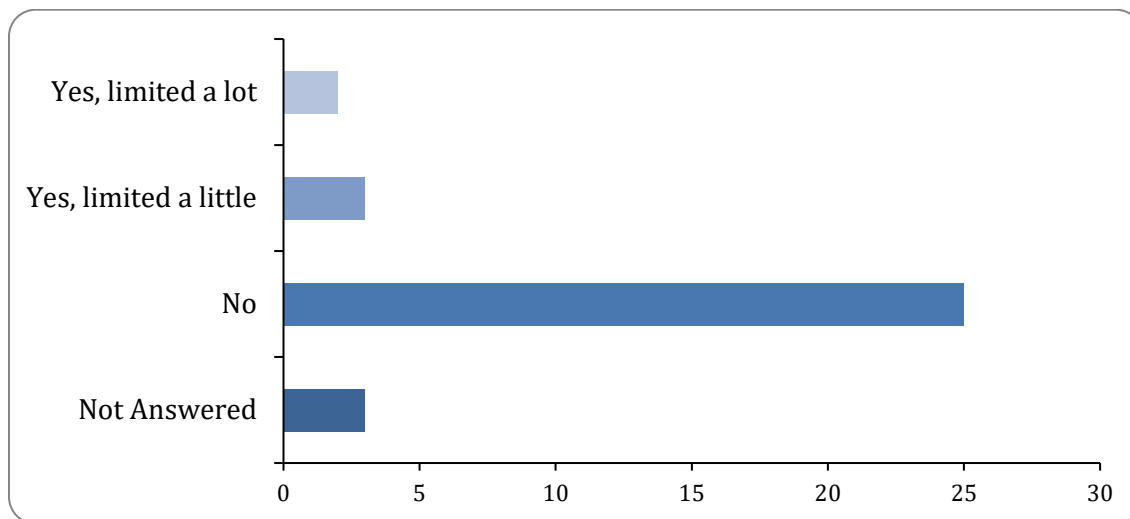


Option	Total	Percent
Under 16	0	0.00%
16-19	0	0.00%
20-24	7	21.21%
25-34	8	24.24%
35-44	1	3.03%
45-54	7	21.21%
55-59	3	9.09%
60-64	0	0.00%
65-74	2	6.06%
75+	1	3.03%
Prefer not to say	1	3.03%
Not Answered	3	9.09%

9: Are your day to day activities limited because of a health problem or disability that has lasted, or is expected to last, at least 12 months?

Disability

There were 30 responses to this part of the question.

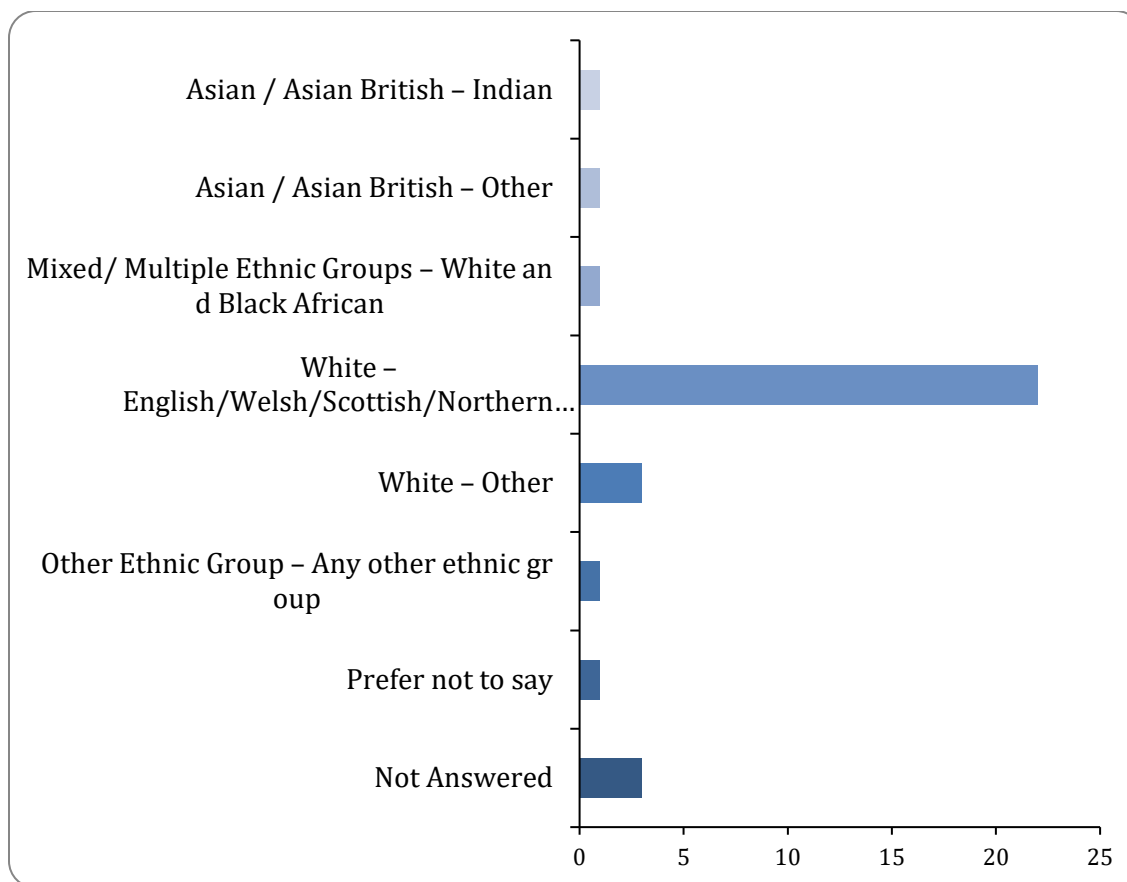


Option	Total	Percent
Yes, limited a lot	2	6.06%
Yes, limited a little	3	9.09%
No	25	75.76%
Prefer not to say	0	0.00%
Not Answered	3	9.09%

10: Which of the following best describes your ethnicity?

Ethnicity

There were 30 responses to this part of the question.



Option	Total	Percent
Asian / Asian British – Indian	1	3.03%
Asian / Asian British – Pakistani	0	0.00%
Asian / Asian British – Bangladeshi	0	0.00%
Asian / Asian British – Chinese	0	0.00%
Asian / Asian British – Other	1	3.03%
Black / Black British / Caribbean / African – Caribbean	0	0.00%
Black / Black British / Caribbean / African – African	0	0.00%
Black / Black British – Other	0	0.00%
Mixed/ Multiple Ethnic Groups – White and Black Caribbean	0	0.00%
Mixed/ Multiple Ethnic Groups – White and Black African	1	3.03%
Mixed/ Multiple Ethnic Groups – White and Asian	0	0.00%
Mixed/ Multiple Ethnic Groups – Other	0	0.00%
White – English/Welsh/Scottish/Northern Irish/British	22	66.67%
White – Irish	0	0.00%

White – Gypsy or Irish Traveller	0	0.00%
White – Roma	0	0.00%
White – Other	3	9.09%
Other Ethnic Group – Arab	0	0.00%
Other Ethnic Group – Any other ethnic group	1	3.03%
Don't know	0	0.00%
Prefer not to say	1	3.03%
Not Answered	3	9.09%

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Briefing Note: Cumulative Impact Assessment (CIA) and Special Saturation Policy (SSP)

As members of the Licensing Committee, you have a statutory duty to promote the four licensing objectives under the Licensing Act 2003:

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

These four objectives are the legal foundation for all licensing decisions. While economic and cultural factors—like supporting live music venues—are important, they cannot take priority over these legal duties.

What is a Cumulative Impact Assessment?

A Cumulative Impact Assessment (CIA) provides evidence to assist the Council to decide if the number of licensed venues in one area is causing problems (such as noise, crime, or safety issues), and if so, the Council can introduce a Special Saturation Policy (SSP) to help manage this.

Oxford City Council has previously adopted SSPs for Central Oxford and East Oxford, based on evidence of cumulative impact in those areas.

How the SSP Affects Licensing Applications

Even in areas covered by an SSP, every licence application must be looked at individually. The SSP doesn't mean automatic refusal, it means applicants must show how their venue won't make existing problems worse. This is a key principle set out in paragraph 14.45 of the Section 182 Guidance:

“The effect of adopting a special policy of this kind is to create a rebuttable presumption that applications... will normally be refused... unless the applicant can demonstrate that their application will not add to the cumulative impact. However, this does not relieve the licensing authority of its duty to consider each application properly and on its own merits.”

This means that:

- Applicants are not automatically refused a licence in an SSP area.
- They must, however, proactively demonstrate how their proposal will not exacerbate existing issues in the area.
- Licensing authorities must still weigh the evidence, consider any proposed conditions, and assess whether the application upholds the licensing objectives.

Benefits of the SSP in Oxford

In Oxford, the SSP has had a positive influence on applicant behaviour. It has encouraged:

- Early engagement with the Licensing Authority and Thames Valley Police.
- Higher-quality applications, with applicants proposing robust conditions from the outset to address local concerns.
- A more collaborative approach to licensing, where applicants are aware of the area's sensitivities and tailor their operations accordingly.

Why the SSP Matters for Licensing Control

There are no other legal tools that work in the same way as the Special Saturation Policy (SSP). Without it, the Council's ability to uphold the licensing objectives is reduced, and there is greater reliance on reacting to problems after they occur, rather than preventing them in the first place.

Without an SSP:

- There is no presumption of refusal, even in areas with high levels of crime, nuisance, or public safety concerns.
- Licensing authorities have less scope to require applicants to address pre-existing issues in the area.
- Applicants are only expected to mitigate the direct impact of their own premises, not the cumulative impact of many premises in close proximity.

With an SSP:

- Applicants must mitigate against the broader context, even if they are new to the area and did not contribute to existing problems.
- This allows the Licensing Authority to impose more tailored conditions or refuse applications that do not sufficiently address the cumulative impact.
- It strengthens the authority's ability to protect residents, manage the night-time economy, and uphold the licensing objectives in high-pressure areas.

What We're Asking You to Do

We are currently preparing a revised report for committee consideration. To ensure it addresses all relevant factors:

- Please review the previous report and this briefing.
- If there are specific questions, concerns, or areas you feel need further exploration, let us know.
- Submit your feedback to jcurnow@oxford.gov.uk or kthorp@oxford.gov.uk or licensing@oxford.gov.uk by **11th August 2025**.

This will help us ensure the final report to the Committee presents viable options and supports informed decision-making.

If you have any questions or would like further clarification, please don't hesitate to get in touch.

Key Guidance and Resources

- Previous CIA Report (2025)

The full report previously presented to committee.

<https://mycouncil.oxford.gov.uk/documents/s84618/CUMULATIVE%20IMPACT%20ASSESSMENT%20FULL%20REPORT.pdf>

- Oxford City Council Statement of Licensing Policy

Sets out how the Council applies licensing law locally, including CIA and SSP policies.

<https://www.oxford.gov.uk/downloads/file/1115/statement-of-licensing-policy>

- Section 182 Guidance (Home Office)

Statutory guidance on how to apply the Licensing Act 2003, including cumulative impact policies.

https://assets.publishing.service.gov.uk/media/67b73b7b78dd6cacb71c6ac8/Revised_guidance_issued_under_section_182_of_the_Licensing_Act_2003_-_October+2024+_1_.pdf

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Licensing Authority

www.oxford.gov.uk



Cumulative Impact Assessment 2025



1. Cumulative Impact Assessments – Background

- 1.1 The concept of cumulative impact has been described within the Secretary of State's Guidance since the commencement of the 2003 Act.
- 1.2 The guidance describes cumulative impact as “the potential impact on the promotion of the licensing objectives of a number of licensed premises concentrated in one area”.
- 1.3 For clarity, the licensing objectives are:
 - Prevention of crime and disorder
 - Prevention of a public nuisance
 - Public safety
 - Protection of children from harm
- 1.4 The Licensing Authority had previously adopted a Special Saturation Policy within its Statement of Licensing Policy, which covered both Oxford City Centre and East Oxford, following assessment of the particular impact from the concentration of licensed premises in those areas.
- 1.5 The Policing and Crime Act 2017 amended the Licensing Act 2003 to place ‘Cumulative Impact Assessments’ on a statutory footing by introducing paragraph 5a of the Licensing Act 2003. This amendment came into force on 6th April 2018.
- 1.6 This Cumulative Impact Assessment is therefore being published under these new provisions of the Licensing Act 2003. The policy will be reviewed no later than every three years from the date it comes into force.
- 1.7 Section 182 Guidance states that “A Cumulative Impact Assessment (CIA) may be published by a licensing authority to help it to limit the number or types of licence applications granted in areas where there is evidence to show that the number or density of licensed premises in the area is having a cumulative impact and leading to problems which are undermining the licensing objectives. CIAs relate to applications for new premises licences and club premises certificates and applications to vary existing premises licences and club premises certificates in a specified area”.

2. Consultation

- 2.1 As per section 5a of the Licensing Act 2003, in preparing the Cumulative Impact Assessment the Licensing Authority will consult with the persons mentioned in section 5(3) of the Licensing Act 2003, namely:
 - the Chief Officer of Police
 - the Chief Officer of the Fire and Rescue Service
 - persons/bodies representative of the Local Authority with the function of public health
 - persons/bodies representative of local holders of premises licences
 - persons/bodies representative of local holders of club premises certificates
 - persons/bodies representative of local holders of personal licences
 - persons/bodies representative of businesses and residents in the City of Oxford
 - persons/bodies representative of Child Protection Services

- other organisations as appear to the Licensing Authority to be affected by licensing matters, including local community, cultural, educational and entertainment organisations.

2.2 The Licensing Authority will consider the views of all those consulted prior to determining this policy.

3. Cumulative Impact Assessment

3.1 The assessment will relate to all premises within specified areas that have a premises licence or a club premises certificate which will be carrying on or proposing to carry on the following licensable activities:

- The sale or supply of alcohol on or off the premises
- The provision of late night refreshment on or off the premises

3.2 CIAs do not apply to Temporary Event Notices (TENS); however it is open to the police and environmental health authority (as relevant persons) to refer to evidence published within a CIA when objecting to a TEN.

3.3 While the evidence underpinning the publication of this CIA should generally be suitable as the basis for a decision to refuse an application or impose conditions, it does not change the fundamental way that decisions are made under the 2003 Act. Each decision in an area subject to a CIA therefore still needs to be made on a case-by-case basis and with a view to what is appropriate for the promotion of the licensing objectives. Importantly, the publication of this CIA would not remove the Licensing Authority's discretion to grant applications for new licences or applications to vary existing licences, where the Authority considers this to be appropriate in the light of the individual circumstances of the case.

3.4 It also does not remove the requirement for a relevant representation to be submitted by a responsible authority or a member of the public (defined as 'any other person' within the act) against an application for it to be considered by the Licensing Sub-Committee. An application that does not receive relevant representations is deemed granted under the Act.

3.5 The Licensing Authority's Special Saturation Policy creates a rebuttable presumption that an application within the designated cumulative impact areas for new premises licences or variations that are likely to add to the existing cumulative impact will normally be refused if relevant representations are received. It is for the applicant to demonstrate that their application would not add to the cumulative impact of such licensed premises in the areas. Applicants are encouraged to liaise with the Licensing Authority and other Responsible Authorities in advance of submitting an application.

3.6 The steps to be followed in considering whether to publish a CIA are summarised below.

- identify concern about crime and disorder; public safety; public nuisance or protection of children from harm in a particular location.

- Consider whether there is good evidence that crime and disorder or nuisance are occurring, or whether there are activities which pose a threat to public safety or the protection of children from harm.
- If there is evidence that such problems are occurring, identify whether these problems are being caused by the customers of licensed premises, or that cumulative impact is imminent.
- Identify the boundaries of the area where problems are occurring (this can involve mapping where the problems occur and identifying specific streets or localities where such problems arise).
- Consult those specified in section 5(3) of the 2003 Act. As with consultations in respect of the licensing policy statement as a whole, it is for each licensing authority to determine the extent of the consultation it should undertake in respect of a CIA (subject to the statutory requirements).

3.7 The Licensing Authority had previously adopted a special policy on cumulative effect, known as its Special Saturation Policy, and it is now being readopted following this Cumulative Impact Assessment.

4. Cumulative Impact Assessment Statement

4.1 This assessment is being published because the authority is of the opinion that the number of licensed premises and club premises certificates within the City Centre and East Oxford area is such that it is likely that granting further licences or variation to licences would be inconsistent with the authority's duty to promote the licensing objectives. This opinion has been reached after careful consideration of evidence showing high levels of public nuisance, anti-social behaviour and crime and disorder within these areas.

4.2 Having considered the available evidence and data, from Thames Valley Police and other Responsible Authorities, the Licensing Authority considers that it is appropriate and necessary to control cumulative impact.

4.3 The areas covered by the policy are the City Centre, as shown in **Appendix One**, and East Oxford, predominately Cowley Road, as shown in **Appendix Two**.

4.4 The evidence for the Cumulative Impact Assessment has been supplied by Thames Valley Police, and other Responsible Authorities on the grounds of crime and disorder, public nuisance and public safety and is set out in **Appendix Three**.

4.5 In areas where there is an excessive accumulation of off and on licensed premises, it is relatively straight forward to provide a direct correlation between those premises and public nuisance, anti-social behaviour and crime and disorder in the area, through an analysis of the evidence including operating hours of the premises and the peak times for incidents and calls for service.

5. Other mechanisms for controlling cumulative impact

5.1 There are mechanisms and interventions, both within and outside the licensing regime, that are available for mitigating adverse impacts on the

licensing objectives and should be considered alongside local licensing policy by the Licensing Authority, Responsible Authorities, other persons, licensed premises and new and existing applicants: For example:

- planning controls
- positive measures to create a safe and clean environment in partnership with local businesses, transport operators and others
- the provision of CCTV,
- ample taxi ranks and Private Hire Companies licensed within district
- powers to designate parts of the city as places where alcohol may not be consumed publicly-Public Space Protection Orders.
- confiscation of alcohol from adults and children in designated areas
- police enforcement of the law with regard to disorder and anti-social behaviour, including the issuing of fixed penalty notices
- enforcement action against those selling alcohol to people who are inebriated
- police powers to close some premises for up to 24 hours on the grounds of disorder, the likelihood of disorder or excessive noise
- the power of police, local businesses or residents to seek a review of the licence or certificate

Appendix One – Cumulative Impact Area – Oxford City Centre



Appendix Two – Cumulative Impact Area – East Oxford



Appendix Three – Cumulative Impact Evidence

Contents

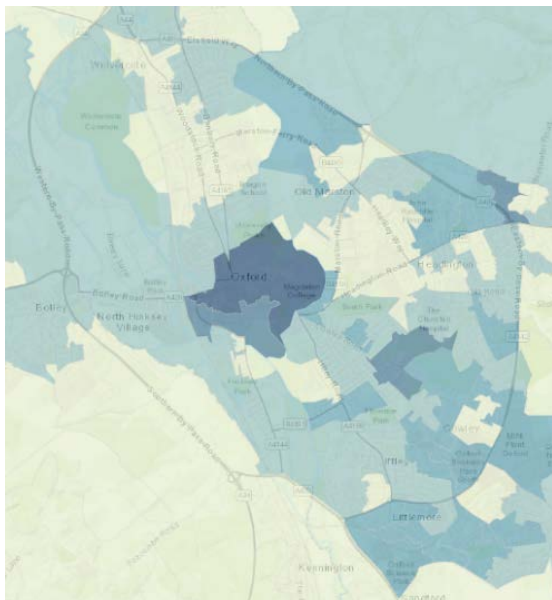
1. Police ASB incidents 2023-2024 – LSOA level
2. Police Criminal damage crimes 2022-2024 – LSOA level
3. Police Public Order crimes 2022-2024 – LSOA level
4. Police Violent crime and sexual offences 2022-2024 – LSOA level
5. Police Violence with injury data
6. CCTV incidents
7. Hospital data – alcohol and night-time economy associations

Glossary

LSOA – Lower Super Output Area

ASB – Anti-social Behaviour

1. Police ASB crimes 2023-2024 – LSOA Level



Map 1

Police recorded anti-social behaviour reports between November 2023 and October 2024. Darker colours represent higher numbers of reports. This is the rate of all crimes classed as anti-social behaviour per 1000 population. This includes personal, environmental and nuisance anti-social behaviour. The data is calculated by ESRI UK by aggregating single crime case data. As crimes are aggregated from LSOA level, the population is based on the mid-year population estimates at LSOA level and aggregated in the same way. The 12 month rolling figures use an average of the population monthly figures over the same period.

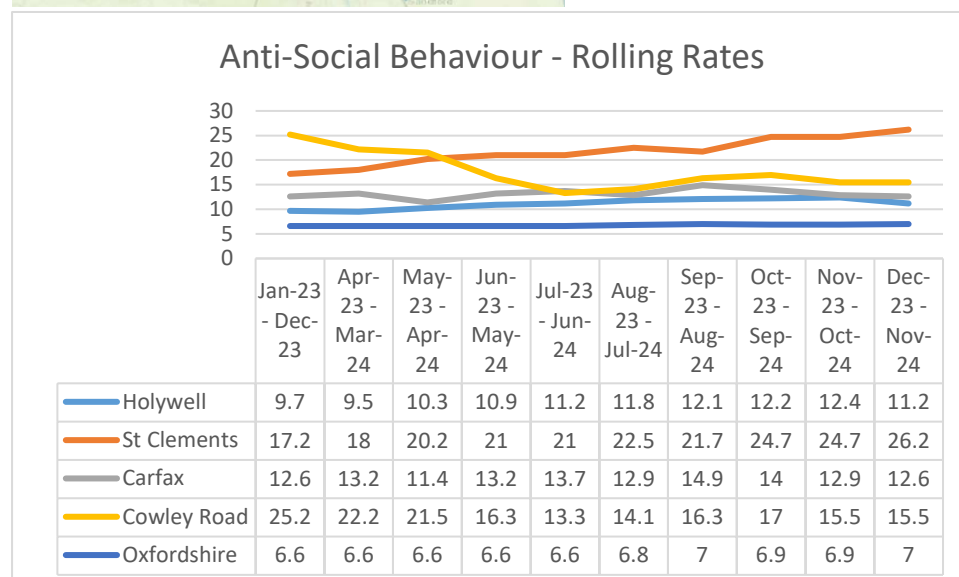
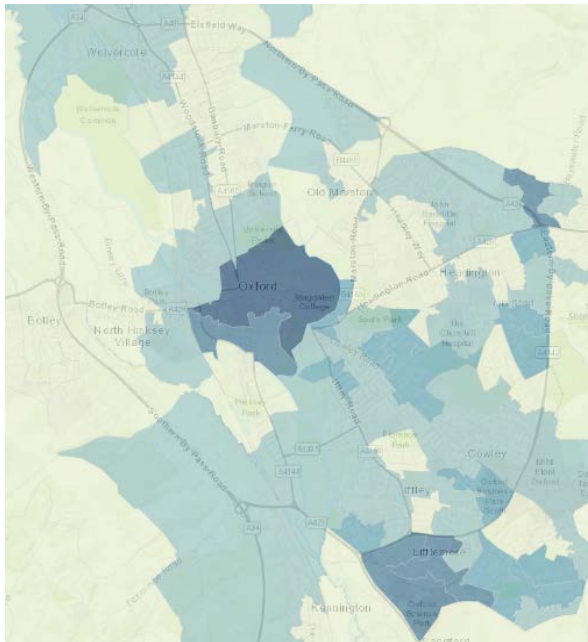


Chart 1

Anti-Social behaviour offences per 1,000 population, Oxford's top four LSOAs compared to Oxfordshire.

2. Police criminal damage and arson crimes 2022-2024 – LSOA level



Map 2

Police recorded criminal damage and arson offences between December 2022 and October 2024. Darker colours represent higher numbers of reports. This is the rate of all crimes classed as criminal damage and arson per 1000 population. This includes damage to buildings and vehicles and deliberate damage by fire. The data is calculated by ESRI UK by aggregating single crime case data. As crimes are aggregated from LSOA level, the population is based on the mid-year population estimates at LSOA level and aggregated in the same way. The 12 month rolling figures use an average of the population monthly figures over the same period.

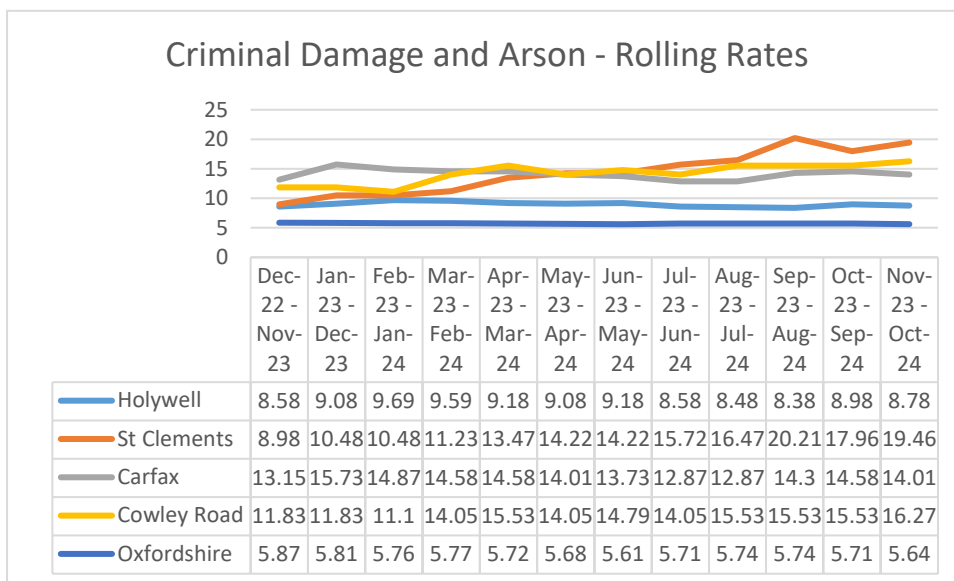
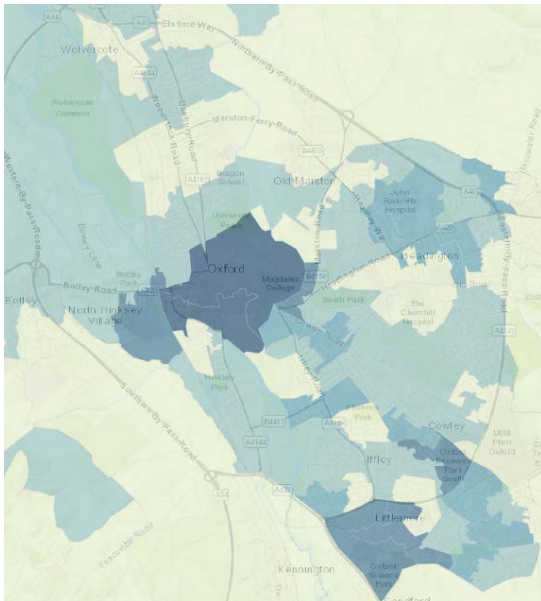


Chart 2

Criminal damage and arson offences per 1,000 population, Oxford's top four LSOAs compared to Oxfordshire.

3. Police Public Order crimes 2022-2024 – LSOA level



Map 3

Police recorded public order between December 2022 and October 2024. Darker colours represent higher numbers of reports. This is the rate of all crimes classed as public order per 1000 population. This includes offences which cause fear, alarm or distress. The data is calculated by ESRI UK by aggregating single crime case data. As crimes are aggregated from LSOA level, the population is based on the mid-year population estimates at LSOA level and aggregated in the same way. The 12 month rolling figures use an average of the population monthly figures over the same period.

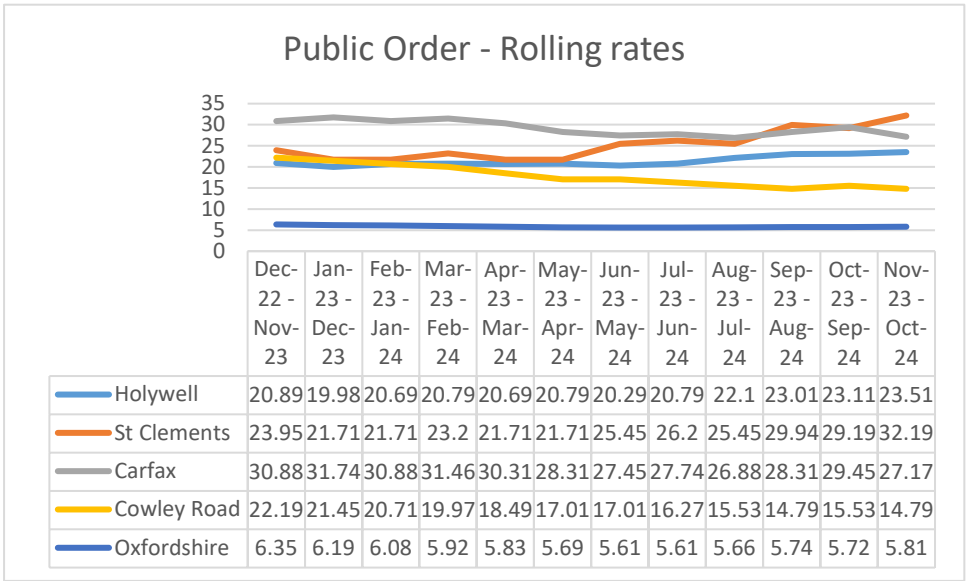
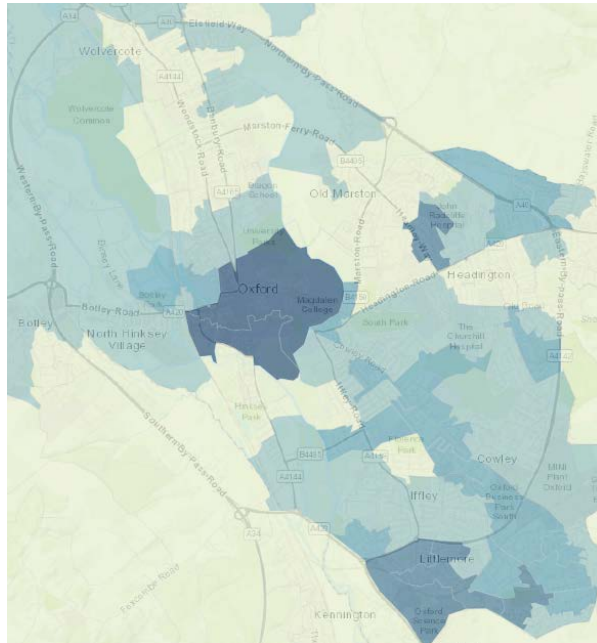


Chart 3

Public order offences per 1,000 population, Oxford's top four LSOAs compared to Oxfordshire.

4. Police Violent crime and sexual offences 2022-2024 – LSOA level



Map 4

Police recorded violence and sexual offences between December 2022 and October 2024. Darker colours represent higher numbers of reports. This is the rate of all crimes classed as violence and sexual offences per 1000 population. This includes offences against the person such as common assaults, grievous bodily harm and sexual offences. The data is calculated by ESRI UK by aggregating single crime case data. As crimes are aggregated from LSOA level, the population is based on the mid-year population estimates at LSOA level and aggregated in the same way. The 12 month rolling figures use an average of the population monthly figures over the same period.

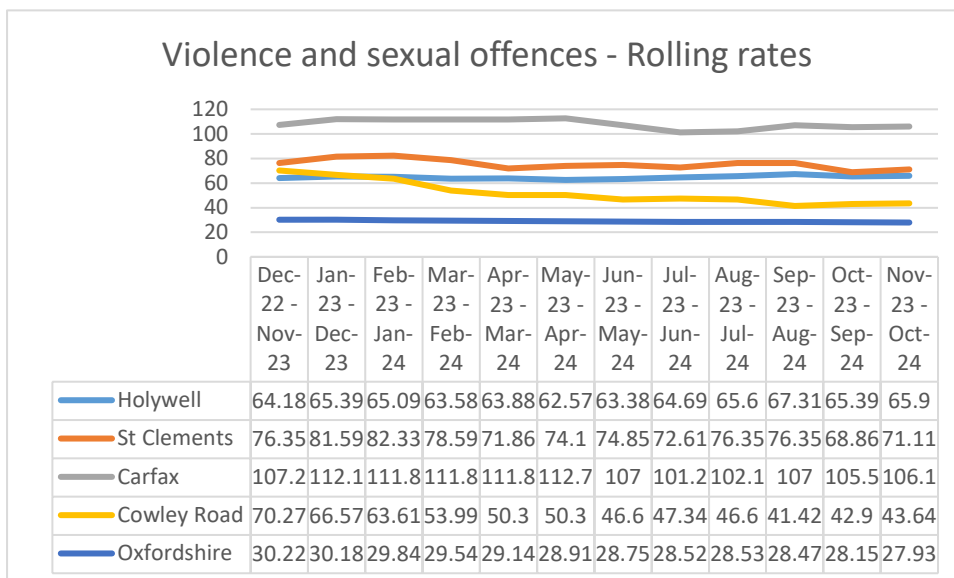


Chart 4

Violence and sexual offences per 1,000 population, Oxford's top four LSOAs compared to Oxfordshire.

5. Police Violence with Injury data

Table 1 illustrates an Oxford violence with injury day-hour heat map. It highlights the night-time economy, in particular Friday and Saturday Night between 19:00 hours to 03:00 hours. It should be noted that while the occurrences can be related to the night-time economy, they may not be occurring in licensed premises or within their proximity.

	Mon	Tue	Wed	Thu	Fri	Sat	Sun
5	4	1	5	4	3	15	15
6	3		4	5	2	7	6
7	6	4	7	10	10	14	4
8	15	22	18	28	20	12	11
9	18	18	11	18	24	18	11
10	25	19	24	26	21	22	19
11	21	21	28	21	41	26	16
12	27	28	33	25	29	29	28
13	23	33	33	36	33	29	31
14	32	33	33	29	23	29	35
15	44	39	42	43	43	30	34
16	35	46	50	43	35	34	26
17	44	39	41	34	25	33	40
18	34	41	32	36	29	41	38
19	26	48	38	26	51	31	47
20	25	21	36	26	36	41	36
21	41	30	30	27	41	43	39
22	23	25	26	33	36	45	44
23	27	19	23	26	46	57	34
0	13	16	13	24	35	62	23
1	9	17	18	15	44	59	19
2	3	12	13	11	37	60	15
3	6	6	4	14	35	40	11
4	6	6	8	5	17	18	5

Table 1

6. CCTV incidents

Chart 5 is an illustration of the hours of incidents between Fridays and Sundays, monitored by public space CCTV cameras in the city. It is not possible to disaggregate the small number of cameras in neighbourhood areas from the cameras in the city centre.

This hourly breakdown demonstrates significantly more public space incidents during the night-time economy period.

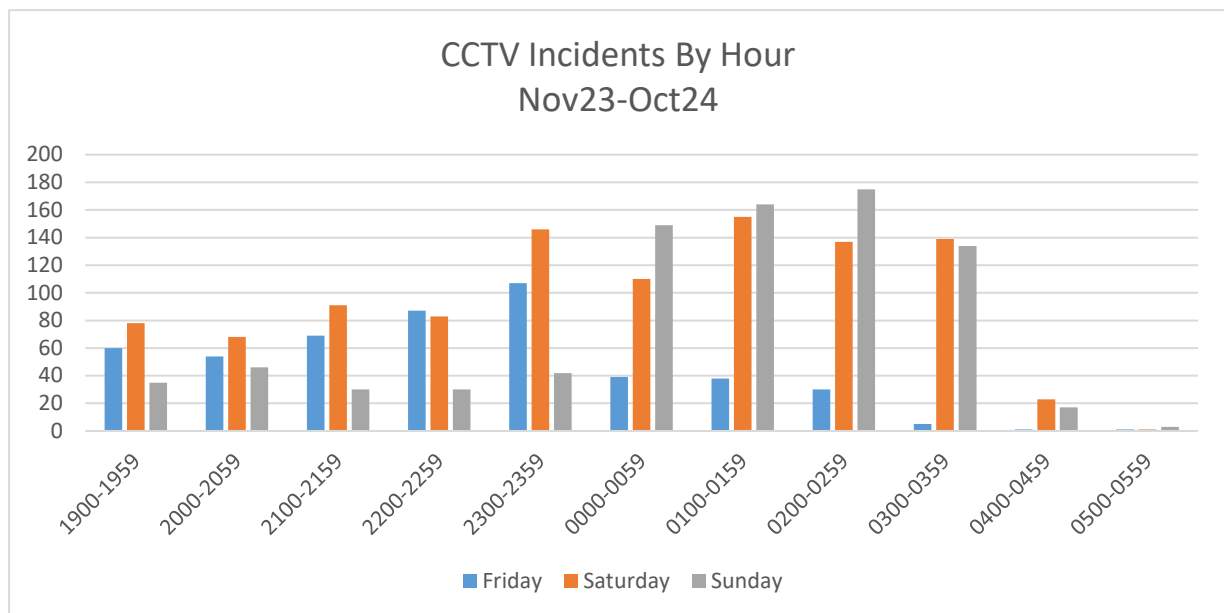


Chart 5

7. Hospital Data

Table 2 illustrates hospital data from 2024, with the day-hour heat map showing a clear concentration around Friday and Saturday Night, indicating an association with the night-time economy. For 2024 around 30% of the attendances were flagged as alcohol related. Of the attendances that were alcohol or drug related, over 90% were exclusively alcohol related, and a further 2% involved alcohol and an illegal drug. This indicates an association between violence and the night-time economy.

	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday	Sunday
6		1	1	2		6	6
7			2		3	2	3
8	3		3	2	1	4	6
9	2	4	4	4	5	3	1
10	7	8	4	6	7	6	6
11	7	6	5	10	9	8	6
12	4	5	8	10	4	5	6
13	7	6	3	11	3	10	6
14	7	11	5	5	5	7	6
15	8	8	7	1	5	12	8
16	7	10	4	6	7	15	7
17	9	11	7	9	1	9	10
18	12	6	7	5	6	6	6
19	10	13	5	7	4	8	13
20	12	14	7	4	5	6	9
21	7	6	9	5	10	8	7
22	13	7	15	5	8	21	8
23	4	12	8	8	10	14	11
0	5	12	9	5	11	12	10
1	4	12	7	5	21	18	13
2	4	10	11	4	24	15	5
3	2	5	6	8	17	24	7
4		5	6	1	9	19	1
5	1	5	5		8	18	3

Table 2

Why do an Equalities Impact Assessment (EqIA)?

1. Equalities Impact Assessment (EqIA) is part of Oxford City Council's **Public Sector Equality Duty (PSED) (Equality Act 2010)**.

The General PSED enables Oxford City Council to:

- a. **identify and remove discrimination,**
 - b. **identify ways to advance equality of opportunity,**
 - c. **foster good relations.**
2. **An EqIA must be done before making any decision(s)** that may have an impact on people and/or services that people use and depend on.
 3. An **EqIA form is one of many tools** that can simplify and structure your equalities assessment.
 4. We are passionate about equalities, and we highly recommend that **Corporate Management Team (CMT) reports and all projects must attach an EqIA.**

For questions, queries, and a chat about how to do your EqIA, please email your EDI officers:

1. Sobia Afridi- safриди@oxford.gov.uk

Please do refer to our [SharePoint Page](#) for support such as FAQs and Examples, etc.

A good EqIA has the following attributes:

1. **Comprehensively considers the 9 protected characteristics.**

1. Age	6. Race & Ethnicity
2. Disability	7. Religion or Belief
3. Gender Reassignment	8. Sex
4. Marriage & Civil Partnership	9. Sexual Orientation
5. Pregnancy & Maternity	NEW- Socio-economic inequalities (voluntary adoption)

2. It has **considered equality of treatment** towards service users, residents, employees, partners, council suppliers & contractors, and Council Members
3. Sufficiently considered **potential and real impact** of proposal or policy on service users, residents, employees, partners, council suppliers & contractors, and Council Members.
4. **Systematically recorded and reported** any potential and real impact of your proposal or policy on service users, residents, employees, partners, council suppliers & contractors, and Council Members
5. **Collected, recorded, & reported sufficient information and data** on how your policy or proposal will have an impact.
6. Offers **mitigations or adjustments** if a PSED has been impacted.
7. Provides clear **justifications** for your decisions.
8. It is written in **plain English** with simple short sentence structures.

Section 1: General overview of the activity under consideration

1.	Name of activity being assessed. For example: -New policy, -Review of existing policy, -Changes in service(s), -New project(s), etc.	Cumulative Impact Assessment Review	2.	The implementation date of the activity under consideration:	21 st May 2025
3.	Directorate/Department(s):	General Licensing	4.	Service Area(s):	Community Safety
5.	Who is (are) the assessment lead(s): Please provide: -Name -Email address	Katie Thorp kthorp@oxford.gov.uk	6.	Contact details, in case there are queries: Please provide: -Name -Email address	Katie Thorp kthorp@oxford.gov.uk
7.	Is this a new or ongoing EqlA?	New	8.	If this is an extension of a previous EqlA, please indicate where the previous EqlA is located and share the link to the said EqlA.	
9.	Date this EqlA started:	7 th May 2025			
10.	Will this EqlA be attached to Corporate Management Team (CMT) reports/updates, which will be published online?	This EqlA will be attached to a report for the Licensing & Gambling Acts Committee	11.	Give a date (tentative or otherwise) when this assessment will be taken to the CMT.	21 st May 2025 (L&G Committee)

Section 2: About the activity, change, or policy that is being assessed.

12.	Type of activity being considered: Check the most appropriate.	<input type="checkbox"/> Budget	<input type="checkbox"/> Decommissioning	<input type="checkbox"/> Commissioning	<input type="checkbox"/> Change to an existing activity.	
		<input type="checkbox"/> New Activity	<input checked="" type="checkbox"/> Others. Please specify: Review of an existing activity.			
13.	Which priority area(s) <u>within Oxford City Council's Corporate strategy (2024-2028)</u> does this activity fulfil? Please check as needed.	<input type="checkbox"/> Good, affordable homes	<input checked="" type="checkbox"/> Strong, fair economy	<input checked="" type="checkbox"/> Thriving Communities	<input type="checkbox"/> Zero Carbon Oxford	<input type="checkbox"/> Well run council
14.	Which priority area(s) within <u>Oxford City Council's Equality, Diversity & Inclusion Strategy (2022)</u> does this activity fulfil? Please check as needed.	<input type="checkbox"/> Responsive services and customer care.	<input type="checkbox"/> Diverse and engaged workforce.	<input type="checkbox"/> Leadership & organisational commitment.	<input checked="" type="checkbox"/> Understanding and working with our communities.	
15.	Outline the aims, objectives, & priorities of the activity being considered.	Review of the Cumulative Impact Assessment (CIA): The aim is for members of the Licensing and Gambling Acts Committee to consider whether the Authority remains of the opinion set out in the current Cumulative Impact Assessment or not, based on the evidence gathered from the consultation.				

16.	<p>Please outline the consequences of not implementing this activity.</p> <p>For example,</p> <ul style="list-style-type: none"> -Existing activity does not fulfill Corporate Objectives, -existing activity is discriminatory and not fulfilling Council's PSED, ... to name a few. 	<p>It is a requirement that the cumulative impact assessment is reviewed every three years, as outlined by Section 5(A) of the Licensing Act 2003. It would be unlawful not to review the cumulative impact assessment.</p>

Section 3: Understanding service users, residents, staff and any other impacted parties.

17.	<p>Have you undertaken any consultations in the form of surveys, interviews, and/or focus groups?</p> <p>Please provide details—</p> <ul style="list-style-type: none"> -when, -how many, and -the approach taken. 	<p>The Licensing Authority carried out a nine-week consultation in the form of a survey to meet the requirements of Section 5A of the Licensing Act 2003.</p>
18.	<p>List information and data used to understand who your residents or staff are and how they will be impacted.</p> <p>These could be—</p> <ul style="list-style-type: none"> -third-party research, -census data, -legislation, -articles, 	<p>Section 5(3) of the Licensing Act 2003.</p> <ul style="list-style-type: none"> a) Thames Valley Police b) Oxfordshire Fire and Rescue Service c) Oxfordshire Public Health d) such persons as the licensing authority considers to be representative of holders of premises licences issued by that authority e) such persons as the licensing authority considers to be representative of holders of club premises certificates issued by that authority f) such persons as the licensing authority considers to be representative of holders of personal licences issued by that authority

	-reports, -briefs.	g) such other persons as the licensing authority considers to be representative of businesses and residents in its area
19.	<p>If you have not done any consultations or collected data & information, are you planning to do so in the future?</p> <p>Please list the details – -when, -with whom, and -how long will you collect the relevant data.</p>	N/A

Section 4: Impact analysis.

20.	<p>Who does the activity impact?</p> <p>Check as needed.</p> <p>The impact may be positive, negative or unknown.</p>	<p>Service Users</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Don't Know <input type="checkbox"/></p> <p>Members of staff</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Don't Know <input type="checkbox"/></p> <p>General public</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Don't Know <input type="checkbox"/></p> <p>Partner / Community Organisation</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Don't Know <input type="checkbox"/></p> <p>City Councillors</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Don't Know <input type="checkbox"/></p> <p>Council suppliers and contractors</p> <p>Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Don't Know <input type="checkbox"/></p>
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21.


Does the activity impact positively or negatively on any protected characteristics as stated within Equality (Act 2010)?


Check as needed and provide evidence-driven conclusions.

Good Practice is to keep it simple and list your, evidence, insights, and mitigations.

Protected Characteristic	Positive	Negative	Neutral	Don't know	Data/information/evidence supporting your assessment	Analysis & insight Mitigations
Age 78	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<ul style="list-style-type: none"> Equality and Human Rights Commission: Age Discrimination Licensing Act 2003 	<ul style="list-style-type: none"> One of the licensing objectives is the protection of children from harm. The CIA assists in promoting this objective. If the CIA results in the adopting of the SSP this will have a positive impact in promoting the licensing objective.
Disability (Visible and invisible)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<ul style="list-style-type: none"> Equality and Human Rights Commission: Disability Discrimination Consultation responses 	<ul style="list-style-type: none"> A cumulative impact assessment has no adverse impact on disability. Evidence regarding disabilities is not collected as part of the consultation or assessment itself. Any representations submitted regarding an application within the SSP, where one of the reasons is the applicant's

						<p>disability, will be disregarded as irrelevant.</p> <ul style="list-style-type: none"> The suitability of a premises for access or use by disabled persons is dealt with under the Equality Act 2010. An applicant or patron would not be treated less well or put at a disadvantage for a reason that relates to a disability.
<p>Gender re-assignment</p> <p>69</p>	<input type="checkbox"/>	<input type="checkbox"/>	x	<input type="checkbox"/>	<ul style="list-style-type: none"> Equality and Human Rights Commission: Gender reassignment Discrimination Consultation responses 	<ul style="list-style-type: none"> The CIA has no adverse impact on gender or gender re-assignment. The consultation was open to the public and no responses received were in regard to the CIA impacting on gender. Any representations submitted regarding an application within the SSP, where one of the reasons is the applicant's gender re-assignment, will be disregarded as irrelevant. Access to licensed premises within the SSP is not limited by a patrons gender. An applicant would not be put at a disadvantage for a reason that relates to gender re-assignment.
Marriage & Civil Partnership	<input type="checkbox"/>	<input type="checkbox"/>	x	<input type="checkbox"/>	<ul style="list-style-type: none"> Equality and Human Rights Commission: Marriage and civil partnership Consultation responses 	<ul style="list-style-type: none"> The CIA has no direct or indirect impact on this protected characteristic. The consultation was open to the public and no responses received were in regard to the CIA impacting on marriage and civil partnerships.

						<ul style="list-style-type: none"> An applicant would not be put at a disadvantage for a reason that relates to marriage and civil-partnership.
Race, Ethnicity and/or Citizenship	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<ul style="list-style-type: none"> Equality and Human Rights Commission: Race discrimination Consultation responses 	<ul style="list-style-type: none"> The CIA has no direct or indirect impact on this protected characteristic. The consultation was open to the public and no responses received were in regard to the CIA impacting on race, ethnicity and/or citizenship. Any representations submitted regarding an application within the SSP, where one of the reasons is the applicant's race, ethnicity or citizenship, will be disregarded as irrelevant. An applicant would not be put at a disadvantage for a reason that relates to race, ethnicity and/or citizenship.
Pregnancy & Maternity	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<ul style="list-style-type: none"> Equality and Human Rights Commission: Pregnancy and maternity discrimination Consultation responses 	<ul style="list-style-type: none"> The CIA has no direct or indirect impact on this protected characteristic. The consultation was open to the public and no responses received were in regard to the CIA

						<p>impacting on pregnancy and maternity.</p> <ul style="list-style-type: none">An applicant would not be put at a disadvantage for a reason that relates to pregnancy and maternity.	
81	Religion or Belief	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<div><div><div>• Equality and Human Rights Commission: Religion or belief discrimination</div><div>• Consultation responses</div></div><div></div></div>	<ul style="list-style-type: none">The CIA has no direct or indirect impact on this protected characteristic.The consultation was open to the public and no responses received were in regard to the CIA impacting on religion or belief.Any representations submitted regarding an application within the SSP, where one of the reasons is the applicant's religion or beliefs, will be disregarded as irrelevant.An applicant would not be put at a disadvantage for a reason that relates to religion or belief.
	Sex	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<div><div><div>• Equality and Human Rights Commission: Sex discrimination</div><div>• Consultation responses</div></div></div>	<ul style="list-style-type: none">The CIA has no direct or indirect impact on this protected characteristic.The consultation was open to the public and no responses received were in regard to the CIA impacting on sex.

						<ul style="list-style-type: none"> Any representations submitted regarding an application within the SSP, where one of the reasons is the applicant's sex, will be disregarded as irrelevant. An applicant would not be put at a disadvantage for a reason that relates to sex.
Sexual Orientation	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<ul style="list-style-type: none"> Equality and Human Rights Commission: Sexual orientation discrimination Consultation responses 	<ul style="list-style-type: none"> The CIA has no direct or indirect impact on this protected characteristic. The consultation was open to the public and no responses received were in regard to the CIA impacting on sexual orientation. Any representations submitted regarding an application within the SSP, where one of the reasons is the applicant's sexual orientation, will be disregarded as irrelevant. An applicant would not be put at a disadvantage for a reason that relates to sexual orientation.

<p>Socio-economic inequalities such as:</p> <ul style="list-style-type: none"> - income and factors that impact income. -access to jobs <p>This was voluntarily adopted by Oxford City Council on the 13th of March 2024.</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<ul style="list-style-type: none"> Just fair – the socio-economic duty guidance. 	<ul style="list-style-type: none"> The CIA does has no direct or indirect impact on socio-economic inequalities. The CIA ensures that any application within an SSP are more robust to promote the licensing objectives.
<p>Other (voluntary consideration)</p> <p>For example:</p> <p>Migrant, refugee, or asylum seekers.</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		N/A
<p>Other</p> <p>For example:</p> <ul style="list-style-type: none"> - Unpaid carers - Prison population - Homeless population -Council suppliers & contractors -Cabinet Members 	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		N/A

Section 5: Conclusion(s) of your Full Impact Assessment

22.	Conclusions. Check as needed.			
	<input type="checkbox"/> Stop and reconsider the activity.	<input type="checkbox"/> Adjust activity before beginning the activity and continue to monitor.	<input checked="" type="checkbox"/> No major change(s) or adjustments and continue with activity but continue to monitor.	<input type="checkbox"/> No major change(s) or adjustments and continue with the activity. No need to monitor in the future.
23.	<p>Please explain how you have reached your conclusions above.</p> <p>The cumulative impact assessment and any decision to retain the special saturation policy has either a positive or neutral impact on the protected characteristics and therefore no major changes or adjustments are required for this activity.</p>			

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Section 6: Monitoring and review plan.

The responsibility for maintaining a monitoring arrangement of the EqIA action plan lies with the service/team completing the EqIA. These arrangements must be built into the performance management framework such as KPIs or Risk Registers.

24.	Who or which team or service area will be responsible for monitoring equalities impact? For example- - team, -directorate, -service area, -Equalities Steering Group,etc.	General Licensing Team, Community Safety.			
25.	Who (individual, team, or service area) will be responsible for carrying out the EqIA review?	General Licensing Team			
26.	How often will the equality impact be reviewed for this activity? For example- -quarterly, -yearly, etc.	<table border="1"> <tr> <td data-bbox="698 1085 1214 1305"> Every three years, in line with the requirements of the Licensing Act 2003. </td><td data-bbox="1214 1085 1733 1305"> 27. Date when the EqIA will be reviewed again. </td><td data-bbox="1733 1085 2159 1305"> 2028 </td></tr> </table>	Every three years, in line with the requirements of the Licensing Act 2003.	27. Date when the EqIA will be reviewed again.	2028
Every three years, in line with the requirements of the Licensing Act 2003.	27. Date when the EqIA will be reviewed again.	2028			

Section 7: Sign-off

Name: **Katie Thorp**

Job Title: **Supervising Senior
Licensing Officer**

Signature:

Katie Thorp

Name: Full Name

Job Title: Type here

Signature:

Name: **Joshua Curnow**

Job Title: **Licensing Team Manager**

Signature:

Joshua Curnow

Name: Full Name

Job Title: Type here

Signature:

Name: **Abby Abrahams**

Job Title: **Solicitor**

Signature:

Abby Abrahams

Name: Full Name

Job Title: Type here

Signature:

Suggested list of people to include are:

- 1) Project lead/manager.
- 2) Head of service area or team.
- 3) Person who completed the EqlA.
- 4) EDI Lead.
- 5) EDI Specialist.
- 6) For joint projects, please consider the following:
 1. Other project leads
 2. Other service area and/or team lead/managers.

This is not an exhaustive list.

98

You have now reached the end of the assessment.

⚠ Please appended this to any reports and project files for reference.