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Please ask for:
Helen Johnson

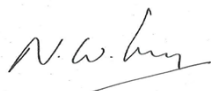
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31 December 2018

Dear Councillor

You are requested to attend a meeting of the WELWYN HATFIELD BOROUGH COUNCIL LICENSING SUB-COMMITTEE to be held on Wednesday 9 January 2019 at 2.30 pm in the Chestnut Board Room, Campus East, Council Offices, Welwyn Garden City, AL8 6AE.

Yours faithfully



Corporate Director
Public Protection, Planning and Governance

AGENDA
PART 1

PROCEDURE

1. APPOINTMENT OF CHAIRMAN
To appoint a Chairman of the Sub-Committee for the meeting.
2. DECLARATIONS OF INTERESTS BY MEMBERS
To note declarations of Members' disclosable pecuniary interests, non-disclosable pecuniary interests and non-pecuniary interests in respect of items on the Agenda.
3. APPLICATION FOR REVIEW OF PREMISES LICENCE FOR INCOGNITO RESTAURANT, 11/13 THE ARCADE, HATFIELD, HERTS (Pages 5 - 136)

To review an application for the premises.

Circulation: Councillors H.Bower P.Mabbott
J.Cragg

Press and Public (except Part II Items)

If you require any further information about this Agenda please contact Helen Johnson, Governance Services on 01707 357467 or email – democracy@welhat.gov.uk

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Agenda Annex

LICENSING AND REGULATED ENTERTAINMENT HEARINGS PROCEDURE

This is the procedure that the Council has adopted under the Licensing Act 2003 (Hearings) Regulations 2005 for all of its licensing hearings to achieve a consistent approach. The hearing is started by the Chairman stating that the Sub-Committee is considering. It is then explained to all the parties that this is a mixed quasi judicial and administrative function. The hearing will take the form of a discussion led by the authority. The strict rules of evidence will not apply although the rules will be observed to a great extent because this is considered to be the best way of presenting the evidence. Documentary or other information produced at the hearing may be taken into account with the consent of all the parties.

All parties will be given an equal maximum period of time to exercise their rights to make representations and provide supporting information to the Sub-Committee as provided for in this procedure. The Chairman will ask those appearing to speak concisely and only on the points that have been raised in the representations submitted. If several representations have been received on similar lines the parties will be invited to appoint a spokesperson. The Sub-Committee will seek to avoid hearing repetitious representations.

- (1) Once all the parties are present in the room and seated the Sub-Committee will enter and the hearing will be convened.
- (2) The Chairman will introduce the Sub-Committee and the Officers serving the Sub-Committee.
- (3) The applicant and/or his representative should confirm their identity to the Sub-Committee and that of any other person they have requested permission to appear, having given the requisite notice of their attendance before the hearing. The Sub-Committee will consider any request by a party for another person to appear at the hearing and such permission will not be unreasonably withheld.
- (4) The objectors and/or their representatives should confirm their identity to the Sub-Committee and that of any other person they have requested permission to appear, having given the requisite notice of their attendance before the hearing. The Sub-Committee will consider any request by a party for another person to appear at the hearing and such permission will not be unreasonably withheld.
- (5) The responsible authorities and/or their representatives should confirm their identity to the Sub-Committee and that of any other person they have requested permission to appear, having given the requisite notice of their attendance before the hearing. The Sub-Committee will consider any request by a party for another person to appear at the hearing and such permission will not be unreasonably withheld.
- (6) The Chairman will invite the Licensing Officer to present his report.
- (7) The applicant may then state their case, calling any witnesses they consider necessary, the requisite notice of their attendance having been given before the hearing. Cross-examination is only permitted if the Chairman considers it is required as part of the hearing.
- (8) With the Chairman's permission members may ask the applicant or their witnesses questions. These questions should be for further information or clarification.

- (9) The objectors then state their case calling any witnesses, the requisite notice of their attendance having been given before the hearing. Cross-examination is only permitted if the Chairman considers it is required as part of the hearing.
- (10) The members may ask the objectors or their witnesses questions. These questions should be for further information or clarification.
- (11) The objectors are then asked if they wish to make a final address to the Sub-Committee.
- (12) The applicant or representative is then given the same opportunity to address the Sub-Committee.
- (13) The Sub-Committee will then retire to consider the representations which have been made and to make its decision. The Sub-Committee will be accompanied by the Legal Adviser and Committee Manager.
- (14) A decision is then taken.
- (15) The Sub-Committee will then return to inform all the parties of the decision. Notice of the determination will be given in writing after the hearing. For certain applications the determination will be made within five working days of the hearing.

If any legal clarification is needed during the Sub-Committee's deliberations, the Legal Adviser will return to inform all the parties of the point considered, together with the advice given and will invite comment on that.

COMMENTS

Should the Sub-Committee decide to grant a licence it may only add conditions or restrictions which are necessary for promoting the licensing objectives and which do not duplicate other statutory requirements. However, the powers to add conditions are confined by the fact that any condition or restriction must be reasonable. The Courts have ruled that a public body in a privileged position of being able to exercise its discretion in dealing with applications for licences and consents of various kinds, when coming to a decision, must exercise that discretion reasonably and fairly and relate it to the subject concerned. A public body is not at liberty to use its powers for an ulterior object, that is one which is not within the ambit or intended purpose of the statutory provision under which the power is exercised however desirable that object may seem in the public interest.

The Sub-Committee will disregard any information which is not relevant to the matter being considered.

The Sub-Committee may exclude all the parties and the public from a hearing or part of a hearing where it considers that the public interest in so doing outweighs the public interest in the hearing.

The Sub-Committee may require any person attending a hearing who in its opinion is behaving in a disruptive manner to leave the hearing.

Agenda Item 3

Part I

Author: Dennis Pennyfather

Executive Member: Councillor F Thompson

Ward: Hatfield Central

WELWYN HATFIELD BOROUGH COUNCIL
LICENSING SUB COMMITTEE – 9 JANUARY 2019
REPORT OF THE CORPORATE DIRECTOR (PUBLIC PROTECTION, PLANNING
AND GOVERNANCE)

REVIEW OF PREMISES LICENCE FOR INCOGNITO RESTAURANT

INCOGNITO: 11/13 THE ARCADE, HATFIELD, HERTFORDSHIRE

LICENSING HEARING - WEDNESDAY 9TH JANUARY 2019; 14:30 HRS

1.0 Summary of the Review

Premises Licence Holder(s)
Mr Emeka M. Orji
Address of Premises
Incognito 11/13 The Arcade, Hatfield, Hertfordshire.

This committee report contains an application for the Review of the Incognito restaurant Premises Licence WK73214/17112015. This premises licence was granted 17th November 2015. Mr Emeka M. Orji is the premises licence holder and also the Designated Premises Supervisor for the premises.

The review of this Premises Licence has been formally requested by Mr James Moatt, Police Licensing Officer on behalf of Hertfordshire Constabulary (the applicant) acting as a responsible authority under the Licensing Act 2003 (as amended).

Appendices:

Appendix A - Premises Licence

Appendix B - Map of Locality

Appendix C - Photographs of Premises

Appendix D - The Review Application from Hertfordshire Constabulary

Appendix E - Supporting Evidence from Hertfordshire Constabulary

1.1 Summary of Representation Received

No other representations for or against this review have been received;

Details of Review Received

The application has been received from Hertfordshire Constabulary under the Licensing Act 2003. Such are their concerns they are reviewing the premises licence for Incognito restaurant on the following licensing objectives: -

- Prevention of Crime & Disorder &
- Public Safety

1.2 Unresolved Review Concerns

Hertfordshire Constabulary have requested a review of the premises licence (WK73214/17112015) as they have serious concerns over the running & control of the premises due to a failure by Mr Orji the premises licence holder and DPS to control activities which are taking place or involving the premises.

1.3 Resolved Review Concerns

The concerns of Hertfordshire Constabulary have not been resolved prior to this hearing.

2.0 Explanation

The application submitted is for the Review of the Incognito Premise Licence.

This licence WK73214/17112015 has been in force since 17th November 2015.

The committee is obliged to determine this application for review of a premises licence for the Incognito in light of the matters in the review application. In determining the review the sub committee must take account of the council's duty to promote the statutory licensing objectives namely: -

- A) The prevention of Crime and Disorder
- B) Public Safety
- C) The Prevention of Public Nuisance
- D) The Protection of children from harm.

In making its decision, the committee is also obliged to have regard to the National Guidance and the Councils own Licensing Policy (Previously circulated).

3.0 Licensing National Guidance (S182)

The sub committee will also wish to be aware of the Guidance issued under section 182 of the licensing Act 2003.

National Guidance Paragraph -11.16: The 2003 Act provides a range of powers for the licensing authority which it may exercise on determining a review where it considers them appropriate for the promotion of the licensing objectives

National Guidance Paragraph -11.17 The licensing authority may decide that the review does not require it to take any further steps appropriate to promote the licensing objectives. In addition, there is nothing to prevent a licensing authority issuing an informal warning to the licence holder and/or to recommend improvement within a particular period of time. It is expected that licensing authorities will regard such informal warnings as an important mechanism for ensuring that the licensing objectives are effectively promoted and that warnings should be issued in writing to the licence holder.

National Guidance Paragraph 11.18 - However, where responsible authorities such as the police or environmental health officers have already issued warnings requiring improvement either orally or in writing that have failed as part of their own stepped approach to address concerns, licensing authorities should not merely repeat that approach and should take this into account when considering what further action is appropriate. Similarly, licensing authorities may take into account any civil immigration penalties which a licence holder has been required to pay for employing an illegal worker.

National Guidance Paragraph 11.19 - Where the licensing authority considers that under its statutory powers is appropriate, it may take any of the following steps: -

- a) To modify the conditions of the licence by altering or omitting or adding to them. (and for this purpose the conditions of the licence are modified if any of them is altered or omitted or any new condition is added
- b) To exclude from the scope of the licence any of the licensable activities to which the application relates.
- c) To remove the designated premise supervisor,
- d) To suspend the licence for a period not exceeding three months
- e) To revoke the licence

National Guidance Paragraph - 11.20; In deciding which of these powers to invoke, it is expected that licensing authorities should so far as possible seek to establish the cause or causes of the concerns that the representations identify. The remedial action taken should generally be directed at these causes and should always be no more than an appropriate and proportionate response to address the causes of concern that instigated the review.

National Guidance Paragraph - 11.21; For example, licensing authorities should be alive to the possibility that the removal and replacement of the designated premises supervisor may be sufficient to remedy a problem where the cause of the identified problem directly relates to poor management decisions made by that individual.

National Guidance Paragraph - 11.22; Equally, it may emerge that poor management is a direct reflection of poor company practice or policy and the mere removal of the designated premises supervisor may be an inadequate response to

the problems presented. Indeed, where subsequent review hearings are generated by representations, it should be rare merely to remove a succession of designated premises supervisors as this would be a clear indication of deeper problems that impact upon the licensing objectives.

National Guidance Paragraph - 11.23; Licensing authorities should also note that modifications of conditions and exclusions of licensable activities may be imposed either permanently or for a temporary period of up to three months. Temporary changes or suspension of the licence for up to three months could impact on the business holding the licence financially and would only be expected to be pursued as an appropriate means of promoting the licensing objectives. So, for instance, a licence could be suspended for a weekend as a means of deterring the holder from allowing the problems that gave rise to the review to happen again. However, it will always be important that any detrimental financial impact that may result from a licensing authority's decision is appropriate and proportionate to the promotion of the licensing objectives. But where premises are found to be trading irresponsibly, the licensing authority should not hesitate, where appropriate to do so, to take tough action to tackle the problems at the premises and, where other measures are deemed insufficient, to revoke the licence.

National Guidance Paragraph - 11.5

Any responsible authority under the 2003 Act may apply for a review of a premises licence or club premises certificate. Therefore, the relevant licensing authority may apply for a review if it is concerned about licensed activities at premises and wants to intervene early without waiting for representations from other persons. However, it is not expected that licensing authorities should normally act as responsible authorities in applying for reviews on behalf of other persons, such as local residents or community groups. These individuals or groups are entitled to apply for a review for a licence or certificate in their own right if they have grounds to do so. It is also reasonable for licensing authorities to expect other responsible authorities to intervene where the basis for the intervention falls within the remit of that other authority. For example, the police should take appropriate steps where the basis for the review is concern about crime and disorder or the sexual exploitation of children.

4.0 Welwyn Hatfield Borough Council Licensing Policy

4.1 Welwyn Hatfield Statement of Licensing Policy Decision 32.1

All decisions and enforcement action taken by us will have regard to the relevant provisions of the Licensing Act 2003, s182 Guidance, the enforcement policy of the Council and to the Regulators Compliance Code.

4.2 Welwyn Hatfield Statement of Licensing Policy Decision 32.3

We believe that proportionate but vigorous enforcement will be a key element in ensuring the successful implementation of the licensing regime and that the four licensing objectives are met. We intend to use our powers under the Licensing Act 2003 and other relevant legislation to ensure a proper balance is struck between the interests of the licensed trade and of the wider community.

4.3 Welwyn Hatfield Statement of Licensing Policy Decision 35.1

The Council recognises that at any time after a Premises Licence or Club Premises Certificate has been issued, a responsible authority, such as the Police or Fire Authority, a councillor, or any other person, may ask the Council to review the licence to premises because of problems arising in connection with any of the four Licensing objectives.

4.4 Welwyn Hatfield Statement of Licensing Policy Decision 35.2

Responsible authorities will aim to give licensees early warning of any concerns identified at premises. The Council will accept requests for a review of a licence unless delegated officers deem them to be frivolous, vexatious or repetitious. In the case of requests which are deemed frivolous, vexatious or repetitious, the Council will notify the person making representations of the reason behind the Council's decision and inform them that the Council intends to take no further action.

4.5 Welwyn Hatfield Statement of Licensing Policy Decision 35.5

If a request for review is justified, the Council will advise the holder of the Premises Licence or Club Premises Certificate concerned that a request has been accepted and the Council will provide them with the details pertaining to the nature of the request, including any supporting evidence, in order that they may be fully aware of the allegations made. The Council will then arrange a meeting of the Licensing Sub Committee, who will review the Premises Licence or Club Premises Certificate.

4.6 Welwyn Hatfield Statement of Licensing Policy Decision 35.6

Where premises are found to be trading irresponsibly, the licensing authority will not hesitate, where appropriate to do so, to take tough action to tackle the problems at the premises and, where other measures are deemed insufficient, to revoke the licence.

Explanation

For the prevention of crime and disorder, the provision of public safety, the prevention of nuisance and the protection of children from harm premises licence holders and designated premises supervisors must bear in mind these licensing objectives in the way they operate and run their premises.

Each objective is of equal importance. There are no other statutory licensing objectives so that the promotion of the four objectives is a paramount consideration at all times.

In order to secure the Licensing objectives, the Council may place additional conditions on a licence beyond those derived from the operating schedule. If this is necessary, the Council will draw from pools of model conditions where available.

5.0 **Recommendation**

5.1 The committee must have regard to the review application made and the evidence it hears. The committee is therefore asked to determine the review application.

- 5.2** In determining the review, the sub-committee may on behalf of the licensing authority, and having regard to the promotion of the licensing objectives, statute, guidance and policy decide on the following courses of action:
- a) To modify the conditions of the licence by altering or omitting or adding to them. (and for this purpose the conditions of the licence are modified if any of them is altered or omitted or any new condition is added).
 - b) To exclude from the scope of the licence any of the licensable activities to which the application relates.
 - c) To remove the designated premise supervisor,
 - d) To suspend the licence for a period not exceeding three months
 - e) To revoke the licence

Name of author	Dennis Pennyfather
Title	Licensing Technical Officer
Date	November 2018

Appendices

- a. Premises licence
- b. Map of Locality
- c. Photographs
- d. Premises Licence Review Application
- e. Supporting Evidence for the Police Review

Premises Licence

Issued by the Licensing Authority:

Welwyn Hatfield Borough Council,
Council Offices,
The Campus,
Welwyn Garden City AL8 6AE

Reference number:
WK73214/ 01082018

Premises Licence Number

WK73214

Part 1 – Premises Details

Postal address of premises or, if none, Ordnance Survey map reference or description	
Incognito African Lounge 11-13 The Arcade	
Post Town Hatfield	Postcode AL10 0JY
Telephone Number	
Where the licence is time limited, the dates	
NA	
Licensable activities authorised by the licence	
Supply of alcohol Late Night Refreshment Recorded music	
The times the licence authorises the carrying out of licensable activities	
Supply of alcohol	12.30 – 23.30 Sunday to Thursday 12.30 –03.00 Friday and Saturday
Late Night Refreshment	23.00 – 23.30 Sunday To Thursday 23.00- 04.00 Friday and Saturday
Recorded Music	12.30 – 23.30 Sunday to Thursday 12.30 –04.00 Friday and Saturday

The opening hours of the premises

12.30 – 23.30 Sunday to Thursday
12.30 – 04.00 Friday and Saturday

No admittance or readmittance after 02.00hrs.

Where the licence authorises supplies of alcohol, whether these are on and/or off supplies

On

Part 2

Name, (registered) address, telephone number and e-mail (where relevant) of holder of premises licence

Mr Emekam Orji
11-13 The Arcade
Hatfield
Herts
AL10 0JY
07712 885711

Registered number of holder, for example company number, charity number (where applicable)

NA

Name, address and telephone number of designated premises supervisor where the premises licence authorises the supply of alcohol

Mr Emeka Orji
121 Campion Road
Hatfield
Herts
AL10 9FL
07712 885711

Personal licence number and issuing authority of personal licence held by designated premises supervisor where the premises licence authorises the supply of alcohol

Welwyn Hatfield Council LN 8916/1

Annex 1 – Mandatory Conditions

Premises Licences – new Mandatory Conditions

If you are licensed to sell alcohol:	
A1. (on and/or off sales)	<p>No supply of alcohol may be made under this licence:</p> <ul style="list-style-type: none"> a) At a time when there is no designated premises supervisor in respect of the premises licence; or b) At a time when the designated premises supervisor does not hold a personal licence or his personal licence is suspended
A2. (on and/or off sales)	<p>Every supply of alcohol under this licence must be made or authorised by a person who holds a personal licence.</p>
A3. (on sales only)	<ul style="list-style-type: none"> 1) The responsible person must ensure that staff on relevant premises do not carry out, arrange or participate in any irresponsible promotions in relation to the premises. 2) In this condition, an irresponsible promotion means any one or more of the following activities, or substantially similar activities, carried on for the purpose of encouraging the sale or supply of alcohol for consumption on the premises- <ul style="list-style-type: none"> a) games or other activities which require or encourage, or are designed to require or encourage, individuals to – <ul style="list-style-type: none"> i) drink a quantity of alcohol within a time limit (other than to drink alcohol sold or supplied on the premises before the cessation of the period in which the responsible person is authorised to sell or supply alcohol), or ii) drink as much alcohol as possible (whether within a time limit or otherwise); b) provision of unlimited or unspecified quantities of alcohol free or for a fixed or discounted fee to the public or to a group defined by a particular characteristic in a manner which carries a significant risk of undermining a licensing objective; c) provision of free or discounted alcohol or any other thing as a prize to encourage or reward the purchase and consumption of alcohol over a period of 24 hours or less in a manner which carries a significant risk of undermining a licensing objective; d) selling or supplying alcohol in association with promotional posters or flyers on, or in the vicinity of, the premises which can reasonably be considered to condone, encourage or glamorise anti-social behaviour or to refer to the effects of drunkenness in any favourable manner. e) dispensing alcohol directly by one person into the mouth of another (other than where that other person is unable to drink without assistance by reason of disability).
A4. (on sales only)	<p>The responsible person must ensure that free potable water is provided on request to customers where it is reasonably available.</p>
A5. (on and/or off sales)	<ul style="list-style-type: none"> 1) The premises licence holder must ensure that an age verification policy is adopted in respect of the premises in relation to the sale or supply of alcohol. 2) The designated premises supervisor in relation to the premises licence must ensure that the supply of alcohol at the premises is carried on in accordance with the age verification policy. 3) The policy must require individuals who appear to the responsible person to be under 18 years of age (or such older age as may be specified in the policy) to produce on request, before being served alcohol, identification bearing their photograph, date of birth and either- <ul style="list-style-type: none"> a) a holographic mark, or

	<p>b) an ultraviolet feature.</p>
<p>A6. (on sales only)</p>	<p>The responsible person must ensure that—</p> <ol style="list-style-type: none"> a) where any of the following alcoholic drinks is sold or supplied for consumption on the premises (other than alcoholic drinks sold or supplied having been made up in advance ready for sale or supply in a securely closed container) it is available to customers in the following measures— <ol style="list-style-type: none"> i) beer or cider: ½ pint; ii) gin, rum, vodka or whisky: 25 ml or 35 ml; and iii) still wine in a glass: 125 ml; b) these measures are displayed in a menu, price list or other printed material which is available to customers on the premises; and c) where a customer does not in relation to a sale of alcohol specify the quantity of alcohol to be sold, the customer is made aware that these measures are available.
<p>A7. (on and/or off sales)</p>	<ol style="list-style-type: none"> 1) A relevant person shall ensure that no alcohol is sold or supplied for consumption on or off the premises for a price which is less than the permitted price. 2) In this condition:— <ol style="list-style-type: none"> a) “permitted price” is the price found by applying the formula $P = D + (D \times V)$, where— <ol style="list-style-type: none"> i) P is the permitted price, ii) D is the amount of duty chargeable in relation to the alcohol as if the duty were charged on the date of the sale or supply of the alcohol, and iii) V is the rate of value added tax chargeable in relation to the alcohol as if the value added tax were charged on the date of the sale or supply of the alcohol; b) “duty” is to be construed in accordance with the Alcoholic Liquor Duties Act 1979; c) “relevant person” means, in relation to premises in respect of which there is in force a premises licence— <ol style="list-style-type: none"> i) the holder of the premises licence, ii) the designated premises supervisor (if any) in respect of such a licence, or iii) the personal licence holder who makes or authorises a supply of alcohol under such a licence; d) “relevant person” means, in relation to premises in respect of which there is in force a club premises certificate, any member or officer of the club present on the premises in a capacity which enables the member or officer to prevent the supply in question; and e) “value added tax” means value added tax charged in accordance with the Value Added Tax Act 1994. 3) Where the permitted price would not be a whole number of pennies, the permitted price shall be taken to be the price rounded up to the nearest penny. 4) Where the permitted price on a day (“the first day”) would be different from the permitted price on the next day (“the second day”) as a result of a change to the rate of duty or value added tax, the permitted price which would apply on the first day applies to sales or supplies of alcohol which take place before the expiry of the period of 14 days beginning on the second day.

If you use security staff:	<i>Already in force</i>
S1	<p>Each individual at the licensed premises to carry out a security activity (an activity to which paragraph 2(1)(a) of Schedule 2 of the Private Security Industry Act 2001 applies, and which is licensable conduct for the purposes of that Act) must:</p> <ul style="list-style-type: none"> a) be authorised to carry out that activity by a licence granted under the Private Security Industry Act 2001; or b) be entitled to carry out that activity by virtue of section 4 of that Act
If you are licensed to show films:	<i>Already in force</i>
F1	<p>The admission of persons under the age of 18 to the exhibition of films must be restricted in accordance with any recommendation of the <i>British Board of Film Classification</i>, or, where there is no such recommendation or the licensing authority has notified the holder that section 20(3)(b) of the Licensing Act 2003 applies to the film, the recommendation of the licensing authority.</p>

Annex 2 – Conditions consistent with the operating Schedule

1. The licence holder will be present at all times when alcohol is being served to monitor the sale and consumption of alcohol at the premises.
2. Alcohol will only be served and consumed with food.
3. Alcohol will only be served during the licensed hours.
4. Alcohol will not be served to anyone deemed to be intoxicated.
5. A last order time will be called 30 minutes to 1 hour before closing to ensure the premises are vacated promptly.
6. The licence holder will ensure no alcohol is taken out of the premises for consumption.
7. Staff will be trained in the Licensing Act 2003.
8. The premises licence holder will ensure people leave the premises in a quiet and orderly manner and do not congregate around the premises.
9. No alcohol will be served to anyone under 18.
10. A challenge 25 policy will be in place and photographic ID will be required.
11. Anyone under 18 will not be allowed on the premises unless accompanied by someone over 18 when alcohol is being served.

Conditions agreed with Environmental Health.

Condition: Doors and windows to be kept closed

Whilst live or recorded entertainment is played in the premises (including karaoke), all external doors and windows must be kept closed.

Reason: To protect nearby residential properties from noise disturbance.

Condition: Bottling out

The practice of “bottling out” shall not take place between the hours of 23:00 and 08:00.

Note, Bottling out is the tipping of empty bottles or cans into refuse bins.

Condition added following a Minor Variation

No admittance or readmittance after 02.00hrs

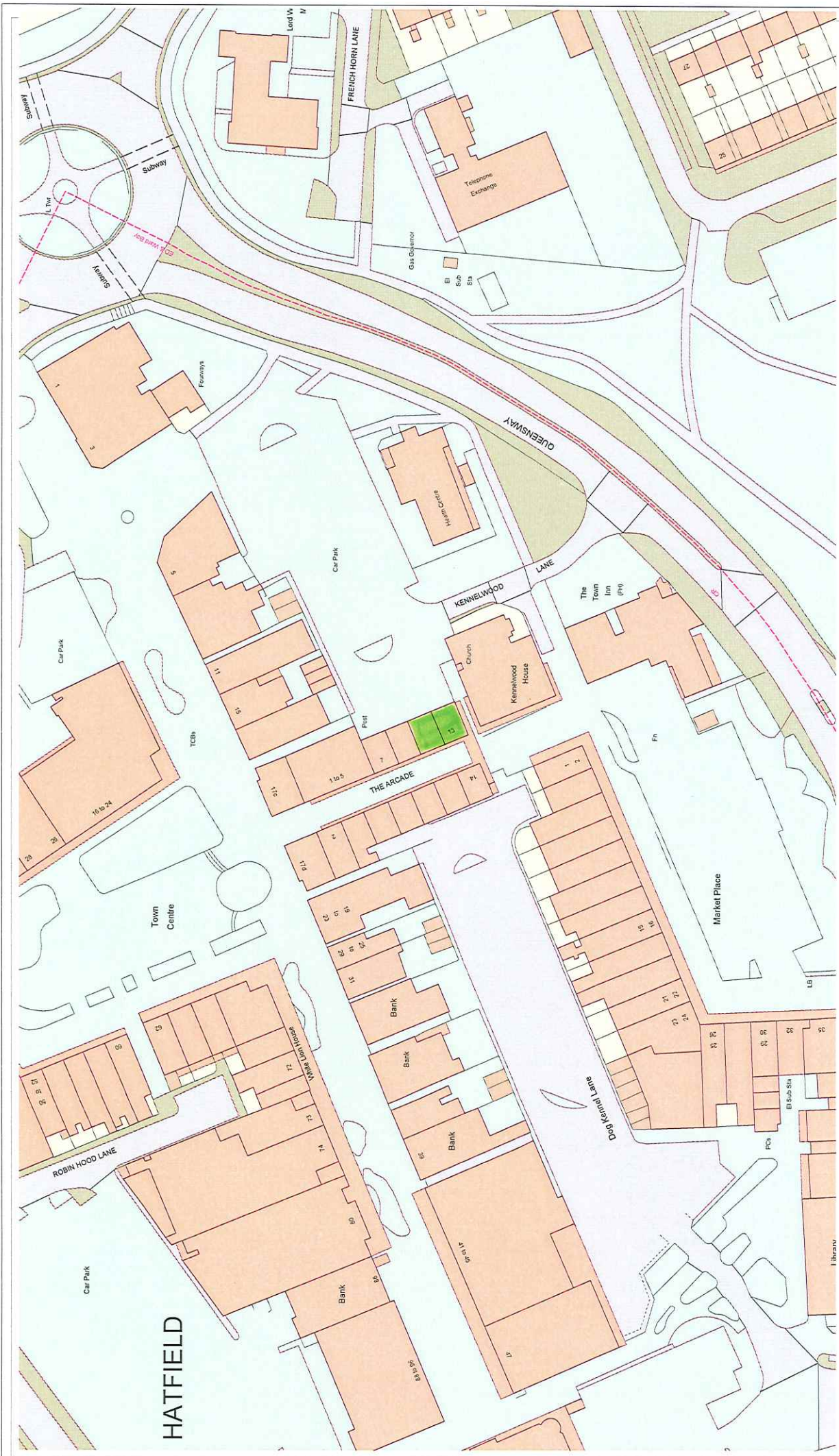
Opening time remains as previous licence.

Annex 3 – Conditions attached after a Hearing by the Licensing Authority

NA

Annex 4 – Plans





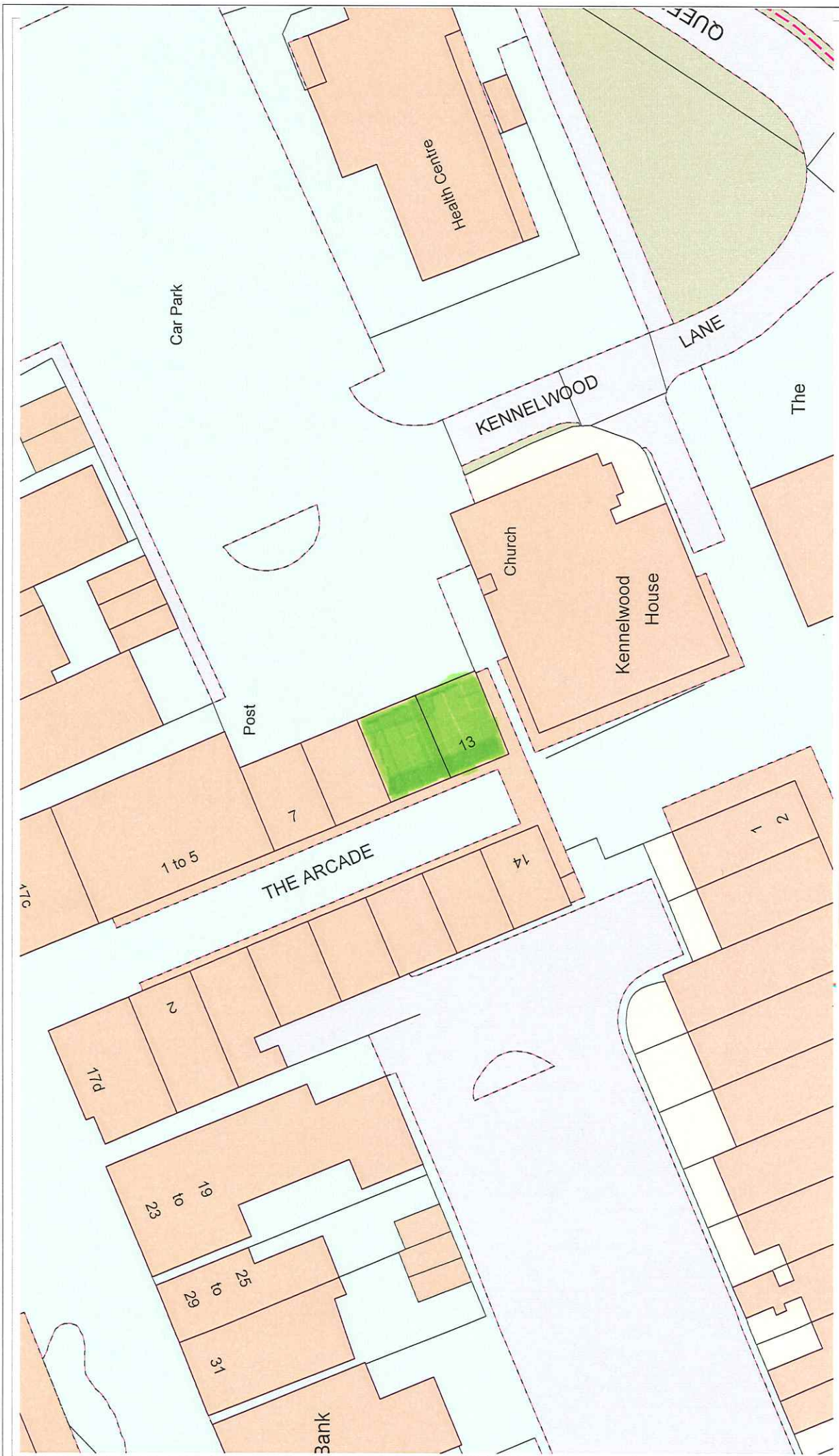
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Welwyn Garden City, Herts. AL8 6AE

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Notes:

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APP "B"

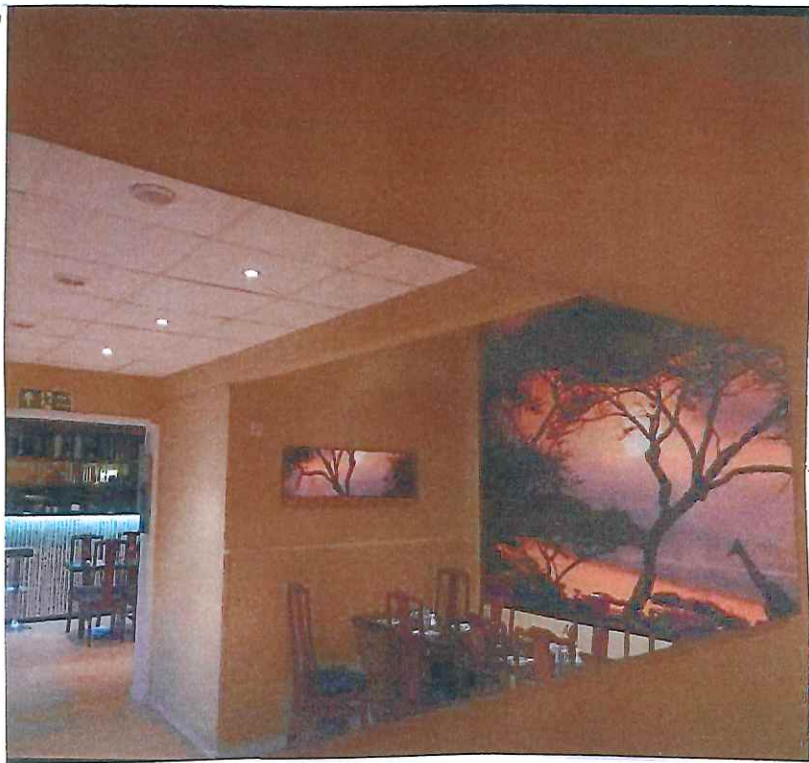
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