

Annexe B Consultation Responses

9 completed the survey monkey questionnaire and 4 e mails received

Answer choices Responses

Responsible authority 2

Business 1

Public 3

Councillor/Politician 0

Tradebody/solicitor 1

Other. 2

total 9

E mails from Police, Regeneration, Public health and G&T licensing consultants

survey questions

We have tried to simplify the policy and make it more helpful to applicants. Do you agree?

90% yes

Do you think that it is reasonable to include expectations of applicants in the policy?

90% yes

Do you agree that Romford Town centre should have a special policy to include all new premises licences, club premises certificates or variation applications?

100% yes

Do you agree that St Andrews Ward in Hornchurch should have a special policy to include all new premises licences, club premises certificates or variation applications?

90% yes

Do you agree that the Harold Hill area should have a special policy regarding applications for off sales?

80% yes

Consultation response verbatim	Consideration of response	Change made (in bold)
<p>The SLP Licensing Policy 6 in our view is inconsistent with the Section 182 Statutory Guidance in that neither planning or any other control regime should be bolted onto Licensing. Your LP6 policy clearly sets out to do that in stating licences will not be granted if the correct planning consent is not in place.</p> <p>It is accepted that Licencees can not trade in breach of planning conditions or permitted hours but these should be enforced by Planning under their controls not by refusing a new licence or</p>	<p>The aim of licensing policy 6 is to reduce duplication and make it clearer for applicants that they do need relevant planning permission before they can utilise their licence. It is our experience that some premises licence holders do not understand this and operate illegally with regard to their planning permission because they have been issued with a licence. However the respondent is correct so the wording has been changed.</p>	<p>The Licensing Authority considers that, in the interests of clarity and transparency, applicants should normally have in place the relevant planning consent for the intended use and hours of operation, or otherwise have lawful planning status, before making an application for a premises licence. However every application will be considered on its merits on a case by case basis</p>

<p>variation. It is legal for a prospective Licencee to apply for a Premises Licence first then seek planning consent. They may not wish to go any further with a premises if they can not get a Licence for instance.</p> <p>We therefore formally object to this part of the draft Licensing Policy for the reason given.</p>		
<p>We question the inclusion of the part of Elm Park within St Andrews Ward within the CIZ. Surely for consistency and fairness to the trade all or none of Elm Park should be included within the special policy area?</p> <p>Secondly we question whether the Hornchurch CIZ is now justified with the closure of the White Hart / Lloyds and the Kings Head over recent years. With restaurants excluded there are only 4 pubs the 2/3 wine bars, the late night wine bar previously known as Olivers and off licences in Hornchurch Town Centre.</p> <p>Finally the area is too widely drawn stretching to Elm Park and part of Emerson Park and should be limited to the Town Centre if it is still justified</p>	<p>The policy was developed by a topic group comprising of cross party councillors. They were keen to retain the existing special policy areas as they felt that they had improved the areas concerned. The majority of respondents agreed with the policy. If applications are received and no representations are made then the application will be granted.</p>	<p>No Change to area</p>
<p>1. We have tried to simplify the policy and make it more helpful to applicants. Do you agree? No While there has clearly been an attempt to make the policy more simplified, holistically it is still not particularly accessible to applicants in some areas. Readers have to spend a long time excavating the relevant pieces of information in order to establish what they need. There does of course need to be particularly prescriptive</p>	<p>Generally respondents felt that the policy was more helpful. Applicants are expected to read the whole policy. The maps have been moved to the appendices so they can be improved and updated without changing the policy document and to reduce the size of the policy.</p>	<p>Maps moved from the policy document to the appendices.</p>

<p>elements of the document, but the initial sections of the executive summary and introduction do not quickly identify what the proposed changes are in a succinct fashion. Readers are left having to read the policies in full detail to gain a grasp of what they are, which only be necessary if all the specifics are required. Something akin to Appendix 14 at the start would be beneficial as it would give the headlines of the policy before more detail was given. Furthermore, the maps are of a poor quality and add little to the document and make it more lengthy than necessary.</p>		
<p>3. Do you agree that Romford Town centre should have a special policy to include all new premises licences, club premises certificates or variation applications. No There is clearly a vertical drinking culture within Romford that has caused significant problems to residents, police and community safety alike. Within recent years, community safety and the police have done great work in reducing the level of offences in the local area, however the implications of the introduction of this policy stifle the remedy to this general issue. The creation of new more socially acceptable evening entertainment will help to dilute the mix of the evening economy. Economic Development is concerned that by increasing further restrictions, this policy would largely prevent this type of action occurring as new businesses would be</p>	<p>Whilst most respondents agreed with the special policy area the Romford Town Centre development framework identifies a strategic objective SO1 – To strengthen Romford’s role as a Metropolitan Centre by better serving the retail and leisure needs of local and neighbouring communities</p> <p>A diverse range of daytime and evening activities and an enhanced cultural offer will generate additional employment and economic activity, and will maintain Romford’s position as a destination of choice for shoppers and leisure visitors in outer east London. Longer opening hours and the provision of a safe, higher value evening economy will result in the capture of a greater market share of the retail and leisure expenditure currently lost to competing centres.</p> <p>Following discussion with the</p>	<p>Licensing Policy 2 The Licensing Authority has adopted a special Policy relating to cumulative impact in relation to:</p> <ul style="list-style-type: none"> • Romford town centre within the ring road • St Andrews Ward <p>This special Policy will create a rebuttable presumption that applications for new premises licences, club premises certificates, or variation applications that are likely to add to the existing cumulative impact will normally be refused, unless the applicant can demonstrate why the operation of the premises involved will not add to the cumulative impact or otherwise impact adversely on the promotion of the licensing objectives. The exception to this policy will be for applications for restaurants where alcohol is sold ancillary to a table meal and the terminal licensing hour is in line with the Policy.</p>

<p>discouraged from involving themselves in an application process of this kind. This policy could lead to many good businesses from being deterred from applying, no matter how reasonable the mitigation procedure is.</p>	<p>Chair of Licensing Committee and the Cabinet Member for Regulatory Services and Community Safety it was agreed to amend the special policy to exclude restaurants.</p>	
<p>Do you agree that St Andrews Ward in Hornchurch should have a special policy to include all new premises licences, club premises certificates or variation applications? No There has been a significant reduction in offences related to the Hornchurch area since 2011. Whilst the link between alcohol and violence is irrefutable, the rates of offences are directly related to three venues within Hornchurch. Therefore, an approach to deter other businesses to grow through the rebuttable presumption leaves a particularly important town centre with a limited opportunity to benefit from the night time economy.</p>	<p>The policy was developed by a topic group comprising of cross party councillors. They were keen to retain the existing special policy areas as they felt that they had improved the areas concerned. The majority of respondents agreed with the policy. If applications are received and no representations are made then the application will be granted. However the policy is amended as above</p>	<p>Licensing Policy 2 The Licensing Authority has adopted a special Policy relating to cumulative impact in relation to:</p> <ul style="list-style-type: none"> • Romford town centre within the ring road • St Andrews Ward <p>This special Policy will create a rebuttable presumption that applications for new premises licences, club premises certificates, or variation applications that are likely to add to the existing cumulative impact will normally be refused, unless the applicant can demonstrate why the operation of the premises involved will not add to the cumulative impact or otherwise impact adversely on the promotion of the licensing objectives. The exception to this policy will be for applications for restaurants where alcohol is sold ancillary to a table meal and the terminal licensing hour is in line with the Policy.</p>
<p>5. Do you agree that the Harold Hill area should have a special policy regarding applications for off sales? Yes A more stringent approach to licensing in Harold Hill seems to be more reasonable as there is a high amount of anti-social behaviour related to the use of alcohol. The difference with Harold Hill to other examples is that the client base of Harold</p>	<p>The evidence for Harold Hill has been evidenced by Public Health and has been included in Appendix 8</p>	<p>Appendix 8 is increased.</p>

<p>Hill is far more localised and does not present a particularly attractive option for external investors to Havering who could end the culture of vertical drinking. Moreover, there is the highest number of families deemed to be troubled and the highest number of people in alcohol treatment services, therefore a more conservative approach is warranted, particularly as this is not a growth area for the boroughs night-time economy. Whilst the special policy does seem appropriate in this case, the evidence presented in Appendix 8 is not comprehensive nor quantitatively supported by data. The evidence consists of a series of normative statements which are not in isolation substantiated enough to provide justification and agreement on this suggestion could only be given with a prior knowledge of the area.</p>		
<p>Upminster has got enough licenced place and doesn't need any more. Could have a special policy as well</p>	<p>There is no evidence for a special policy for Upminster but the area will be kept under review.</p>	<p>No change</p>
<p>I see 7.7 lists the risk assessments venues should take around glassware however is there scope to impose TOUGHENED GLASS WARE (Minimum) inside cumulative impact and saturation zones as a matter of course for new applicants?? After all there is no different feeling to patrons holding toughened or normal glassware in the hand (unlike poly's). Patrons would not be able to differentiate between the two however the safety benefits are huge as detailed in the document.</p>	<p>Consider that this is covered sufficiently in the policy and no change is necessary.</p>	<p>No change</p>

<p>Licensing Policy 20 - Question? What is the rationale behind 400 yards of a school can this distance be lengthening at all?? The more premises restricted under that policy the better</p>	<p>400m is considered to be the accessible distance schoolchildren can travel within their lunch break.</p>	<p>No change</p>
<p>Like the questions section, it's almost a prompt for them to get the application right or at least to the necessary standard. Can we possibly add "His visibility clothing" to appendix 2 questions for applicants under the SIA paragraph?? (Albeit it appears later in model conditions GDGPG6 pg 52)</p>	<p>Agreed</p>	<p>Are SIA door staff employed, numbers of door supervisors, door supervisors wearing high visibility clothing, use of search arches/wands, location of such searches, all such staff to have their details recorded and checks made with SIA website to ensure that licences are current, staff to sign in when commencing work and out when they leave. Is any induction/training given to new door staff?</p>