

Summary of Responses to Statement of Licensing Principles

APPENDIX B

Consultee	Observations	Comment / Action Taken	Amendments to Licensing Policy
Royston Town Council	Welcomed the new Statement of Licensing Principles as <i>"it strengthened the case against gambling"</i>	The Policy doesn't oppose gambling, it retains the 'each application on its own merits' basis having regard to the licensing objectives.	None
	Strong views that no further licences should be granted in Royston	This view cannot be incorporated into the Policy (see above comment)	
GamCare	Support of the principles of local risk assessments and their importance in ensuring gambling premises are not situated near to hostels or support centres for vulnerable persons, or near young persons educational establishments	The Policy includes further clarification on the local authority's expectations with regards to the content of local area profiles and risk assessments	None
	Suggests the Policy includes a specific requirement for operators to have identified training programs for all staff to identify children and other vulnerable persons.	This is adequately covered by the Policy	None
	Suggest that the local risk assessments require the operator to assess adequate staffing levels at key points of the day, particular near other premises frequented by children and vulnerable persons	This has been added as an additional bullet point as part of the requirements of a local risk assessment	Section A2.8.2 (last bullet point)
	Suggest that the local risk assessments require the operator to assess the layout of the premises so as not to attract children and vulnerable persons	This has been added as an additional bullet point as part of the requirements of a local risk assessment	Section A2.8.2 (last bullet point)
	Suggests that local authorities primarily consider applications by GamCare Certified Operators		None
NHDC Environmental Health	Little overlap between environmental health regulation and gambling regulation however supportive of the Policy	None	None
Gosschalks on behalf of the Association of British Bookmakers	Any consideration of local licensing should have regard to declining betting shop numbers, April 2015 planning law changes and low-level problem gambling	Each application must be considered on its own merits with regard to the promotion of the licensing objectives	None
	General support of local area risk assessments	The Policy clarifies the requirements of a local area risk assessment for North Hertfordshire	None
	Concerns over the consequence to the trade of overly burdensome regulation	The Policy adequately balances the promotion of the licensing objectives against the reasonable requirements on operators	None
	Concerns over the proliferation of additional licence conditions without a specific section in the Policy highlighting the need for evidence	This is adequately covered within the Policy and there is no evidence that any inappropriate or unnecessary conditions have been imposed in North Hertfordshire	None
	Numerous concerns about the requirements listed within the Policy in respect of local risk assessments and the relevance to the licensing objectives	The licensing objectives in relation to crime and disorder associated with, and the protection of children and vulnerable persons from, gambling should be given a wide interpretation. All requirements of the local risk assessments can be linked to these two licensing objectives and each local risk assessment should reflect the specific circumstances surrounding each premises therefore no undo burden or obstacle is being imposed	None
	Highlights the incorrect use of the term 'operating schedule' in the section regarding Child Sexual Exploitation; there is no operating schedule attached to a gambling application	The term 'operating schedule' has been amended to 'local risk assessment'.	Section B11.6
	Highlights a possible misconception in the Policy where comment is made about the licensing authority's ability to restrict the number of betting machines in a licensed betting shop; there is no ability to restrict gaming machines in the same way as betting machines	An additional sentence of clarification has been added to the Policy	Section C5.1