

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 |