

STAKEHOLDER COMMENTS ON STATEMENT of LICENSING PRINCIPLES

Organisation/Representative Group or Business	Comment	Officer Comment	Changes to Wyre Forest Policy
<p>British Beer and Pub Association Letter dated 8th August 2006</p>	<p>The British Beer and Pub Association BPPA would like us to include more guidance to applicants in the Statement of Principles.</p> <p>They would like us to commit to a blanket policy of allowing up to four Amusement with Prize machines in licensed premises.</p> <p>They do stress the importance of consistency, and thus commend the use of the LACORS Template.</p> <p>LACORS – Local Authority Co-ordinators of Regulatory Services</p>	<p>Our Statement was designed in the light of the LACORS template – and it has been used as a starting point for production of statements across Worcestershire and Herefordshire. Similarly it has been shared across the Midlands. Our specific intention was to mirror our successful approach in the Licensing Act.</p> <p>Simple language is used in a “core policy” setting out how we intend to administer the legislation, to be supplemented by guidance documents and free provision of help and assistance to both applicants and interested persons.</p> <p>Guidance is specifically excluded from the Statement of Policy because specific guidance will be provided as appropriate.</p> <p>We agree that gambling can result in addiction, and is associated with the use of Amusement with Prize Machines. Comprehensive controls are expected under this regime.</p> <p>With this in mind we do not consider it appropriate that all licensed premises should be able to have four machines (two more than granted by the Act) without the need for a hearing.</p>	

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<p>Association of British Bookmakers</p> <p>Letter dated 2nd October 2006 Received by Malvern Hills District Council but included as response to the generic Gambling Policy adopted by the Districts within the County of Worcestershire</p>	<p>The Association of British Bookmakers (ABB) stress that the betting shop industry has historically been extremely successful at policing itself and is not a source of crime and disorder such as to cause concern to licensing authorities.</p> <p>Inclusion is sought of specific reassurances in the statement that we will not seek to apply conditions such as door supervisors, where such a condition is neither necessary nor appropriate.</p> <p>Betting machines – We are asked to fetter our discretion under section 181 to limit such machines by way of condition. We note the position of the Industry that there is no evidence that such machines give rise to regulatory concerns.</p> <p>Re sites – We are asked to positively encourage “ transfers” of betting establishments from small to larger premises.</p>	<p>We will only make conditions that are necessary, appropriate and proportionate. This is clearly expressed in the statement of principles.</p> <p>We will not seek to constrain businesses except after consideration of evidence received at a hearing by way of valid representations and applicant submissions.</p> <p>Given our declared intention to aim to permit the use of premises, any additional wording is considered superfluous.</p>	<p>No change is required.</p> <p>No change is required.</p> <p>No change is required.</p>

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	<p>Enforcement – We are asked to request that Operators of bookmakers having multiple premises in our district should provide a central point of contact.</p> <p>Responsible Authorities There is a criticism of our inclusion of the word “generally “ which appears to be in contravention of Section 53 of The Gambling Act 2005.</p>	<p>Our expectation is that responsible companies will do this without need for a request. Such a suggestion would be more appropriate in the Industry Codes of Practice with which betting establishments will need to comply. We will include it in any specific guidance that we produce.</p> <p>This point accepted.</p> <p>The word “generally “ will be struck from our Statement of Principles.</p>	<p>We do not consider it appropriate to make such a request in the statement of Principles.</p> <p>Changed in Draft 2.</p>
<p>Children’s Services, Worcestershire County Council</p> <p>Letter dated 5th September 2006</p>	<p>We would wish to see all reference to the area Child Protection Committee removed and replaced with Worcestershire Safeguarding Children Board.</p> <p>We ask that the issue of child protection and safeguarding will figure prominently in any publicity material relating to the Act, particular in the written guidance given to applicants.</p>	<p>We acknowledge the references made to the Worcestershire Safeguarding Children Board.</p> <p>Publicity material will be circulated together with written guidance to applicants where appropriate.</p>	<p>No change to Policy.</p>
<p>Stourport on Severn Town Council</p> <p>Letter dated 24th August 2006</p>	<p>We note that in the introduction to the policy there is no corresponding description of Stourport -on -Severn.</p>	<p>This is an omission.</p> <p>We will include reference to Stourport- on- Severn in the Policy Statement.</p>	<p>Changed in Draft 2.</p>

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<p>Wyre Forest Community Safety Partnership</p> <p>Response Form dated 8th September 2006</p>	<p>We note that there are specific statements for Kidderminster and Bewdley but not for Stourport-on-Severn.</p>	<p>This is an omission.</p> <p>We will include reference to Stourport -on Severn in the Policy Statement.</p>	<p>Changed in Draft 2.</p>
<p>West Mercia Police Licensing Section</p> <p>Response (undated)</p>	<p>Concerns expressed by a responsible authority in relation to their own functions will not be taken into account unless they are relevant to the application itself and to the licensing objectives... etc.</p> <p>It would be highly unlikely and difficult for a council to justify that any representation put forward by a relevant authority would be dismissed without a formal hearing.</p> <p>The wording is ambiguous and should be clarified.</p>	<p>We acknowledge that the word “generally “ has caused confusion and has been commented on by another stakeholder (Association of British Book Makers).</p> <p>It will be struck out to clarify this section.</p>	<p>Changed in Draft 2.</p>
<p>The Clerk, Chaddesley Corbett Parish Council</p> <p>Response Form dated 18th August 2006</p>	<p>Very sensible suggestions.- Well thought out.</p> <p>Have you considered Negotiations with the DHSS, Social services to protect the vulnerable, Headmasters of Schools and Gamblers Anonymous.</p>	<p>We have consulted on our policy with the Safeguarding of Children Board within the County Council, with Head teachers and with Gamblers Anonymous.</p>	<p>No change required.</p>

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	Use of Special Constables would improve the Policy Implementation.	The West Mercia Police have been party to our discussions. No need to change our policy.	
Resident / Neighbourhood Watch Co-ordinator Response Form dated 24 th July 2006	I accept Gambling Addiction is a Personal Problem. I could find no mention of it in the policy.	Addiction per se is not mentioned within the policy Reference is made in the policy to Children and Vulnerable Adults at 7.3 onwards.	No change required.
Business Consultation Response Form dated 6 th September 2006	<ol style="list-style-type: none"> 1. The policy is intended to guide decision-makers, applicants, objectors and others involved in the licensing process, without limiting our duty to consider each individual application on its merits. Do you think that the Policy achieves this balance Reply - Yes 2. The Council has been advised by the Government what information must be contained within our policy there anything we have left out that you feel is relevant and should be included? Reply - No 3. Is there anything in the policy that you disagree with? Reply - Nothing left out 	Stakeholder in agreement with the Draft Policy.	No change required.

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<p>Resident Consultation</p> <p>Response Form dated 21st August 2006.</p>	<p>1. The policy is intended to guide decision-makers, applicants, objectors and others involved in the licensing process, without limiting our duty to consider each individual application on its merits. Do you think that the Policy achieves this balance Reply - Yes</p> <p>2. The Council has been advised by the Government what information must be contained within our policy there anything we have left out that you feel is relevant and should be included? Reply - No</p> <p>3. Is there anything in the policy that you disagree with? Reply - All OK</p>	<p>Resident agrees with the Policy.</p>	<p>No change.</p>
<p>Business Consultation</p> <p>Response Form dated 23rd July 2006</p>	<p>1. The policy is intended to guide decision-makers, applicants, objectors and others involved in the licensing process, without limiting our duty to consider each individual application on its merits. Do you think that the Policy achieves this balance Reply - Yes</p>	<p>Business agrees with Policy.</p>	<p>No change.</p>

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	<p>2. The Council has been advised by the Government what information must be contained within our policy there anything we have left out that you feel is relevant and should be included? Reply - No</p> <p>3. Is there anything in the policy that you disagree with? Reply - No</p>		
<p>Resident Consultation Response Form dated 21st July 2006</p>	<p>1. The policy is intended to guide decision-makers, applicants, objectors and others involved in the licensing process, without limiting our duty to consider each individual application on its merits. Do you think that the Policy achieves this balance Reply - Do not know</p> <p>2. The Council has been advised by the Government what information must be contained within our policy there anything we have left out that you feel is relevant and should be included? Reply - Do not know</p> <p>3 Is there anything in the policy that you disagree with? Reply (Left blank)</p>	<p>Does not disagree with policy.</p>	<p>No change.</p>

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<p>Resident Consultation</p> <p>Response Form dated 24th July 2006</p>	<ol style="list-style-type: none"> 1. The policy is intended to guide decision-makers, applicants, objectors and others involved in the licensing process, without limiting our duty to consider each individual application on its merits. Do you think that the Policy achieves this balance Reply -Yes 2. The Council has been advised by the Government what information must be contained within our policy there anything we have left out that you feel is relevant and should be included? Reply (Left Blank) 3. Is there anything in the policy that you disagree with? Reply – In my opinion there is already too much gambling going on in this country. Everyone wants to get rich without working for it. 4. Gambling should be curbed and not encouraged. 	<p>These comments have been taken as a general statement of opinion.</p> <p>Nothing offered to constructive change.</p>	<p>No change required.</p>

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<p>Ward Councillor</p> <p>Response Form dated 24th July 2006</p>	<ol style="list-style-type: none"> 1. The policy is intended to guide decision-makers, applicants, objectors and others involved in the licensing process, without limiting our duty to consider each individual application on its merits. Do you think that the Policy achieves this balance Reply - Overall it does 2. The Council has been advised by the Government what information must be contained within our policy there anything we have left out that you feel is relevant and should be included? Reply - No I think that this policy is an even handed one that sets out its objectives fairly and is easy to understand when read with the Act. 3. Is there anything in the policy that you disagree with? Reply – No 4. I do feel that the Act is fully adhered to as regards to children in gambling premises/ bingo clubs. The Council should not be seen to be the promoters of excessive gambling. 	<p>Councillor agrees with Policy.</p>	<p>No change required.</p>

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<p>Resident has endorsed stakeholder letter</p> <p>Dated 24th July 2006</p>	<p>Thank you for asking, but I disapprove totally of gambling as it affects the poorest and most foolish people in our society.</p>	<p>This is a general statement.</p> <p>Unable to consider change to our Policy.</p>	<p>No change required.</p>
<p>Wilden Village Cricket Club Stakeholder Consultation</p> <p>Response Form dated 1st September 2006</p>	<ol style="list-style-type: none"> 1. The policy is intended to guide decision-makers, applicants, objectors and others involved in the licensing process, without limiting our duty to consider each individual application on its merits. Do you think that the Policy achieves this balance Reply - Indeed it appears to be extremely fair. 2 The Council has been advised by the Government what information must be contained within our policy there anything we have left out that you feel is relevant and should be included? Reply - It appears all encompassing 3 Is there anything in the policy that you disagree with? Reply – I am uncertain regarding bingo fun social family event. 	<p>Stakeholder agrees with the Policy.</p>	<p>No change required.</p>

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	4. Gambling should be curbed and not encouraged.		
<p>Wharton Park Golf Club Consultation</p> <p>Response Form dated 10th August 2006.</p>	<p>1. The policy is intended to guide decision-makers, applicants, objectors and others involved in the licensing process, without limiting our duty to consider each individual application on its merits. Do you think that the Policy achieves this balance Reply – Yes</p> <p>2. The Council has been advised by the Government what information must be contained within our policy there anything we have left out that you feel is relevant and should be included? Reply – No</p> <p>3. Is there anything in the policy that you disagree with? Reply – No</p>	Respondent agrees with Policy.	No change required.

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<p>Rushock Parish Council Consultation</p> <p>Response Form dated the 11th August 2006</p>	<ol style="list-style-type: none"> 1. The policy is intended to guide decision-makers, applicants, objectors and others involved in the licensing process, without limiting our duty to consider each individual application on its merits. Do you think that the Policy achieves this balance Reply – None 2. The Council has been advised by the Government what information must be contained within our policy there anything we have left out that you feel is relevant and should be included? Reply – None 3. Is there anything in the policy that you disagree with? Reply – None. 4. Thank you for asking us to comment but we are a small parish council with no involvement in gambling licenses. 	<p>General statement.</p> <p>No constructive comments to change.</p>	<p>No change required.</p>