

Responses Received to Consultation of Review of Statement of Licensing Policy 2025 - 2030

RESPONDENT	SECTION / PARA	COMMENT	ACTION
Dorset Police	10.2	Dorset Police support this proposal and invite the Licensing Authority to consider extending the responsibility of applicants to include consideration of the impact that poor dispersal practices can have on our communities. The provision of 'off sales' is addressed elsewhere in this policy (at Chapter 15) and there is statutory guidance on this subject, however, there has been significant adverse impact occurring during the immediate dispersal times following the closure of 'on sales' premises that operate late at night or into the early hours of the morning. Ensuring that excessive consumption of alcohol is avoided, particularly for premises that operate late at night or during the early hours will certainly assist operators to achieve dispersal of customers from their premises with minimal disruption, which we can evidence to include Anti-Social Behaviour (ASB) and crime & disorder, to nearby residential properties. Dorset Police support any measures to discourage alcohol from being taken from an 'on sales' premises, particularly after the closing time, as this will often adversely impact the effectiveness of any dispersal policy operated by the premises. Additional residual impacts include littering and noise pollution which can have a significant impact when incidents occur frequently over a long period of time.	On sales premises should not permit alcohol to be taken from the premises at any time. Licence holders are expected to make provision for challenging this behaviour if it occurs. No premises should continue serving alcohol to already drunk patrons and there should be policies and training in place to address this. This is stated within 10.3 bullet point 1. Suggested amendment:- 10.2 The Licensing Authority expects applicants to address excessive consumption of alcohol and drunkenness on relevant premises. Premises offering on sales with terminal hours after midnight are expected to include within their operating schedules details relating, dispersal policies, and management of patrons in the vicinity of the premises as they leave. This will reduce the risk of anti-social behaviour occurring both on the premises and elsewhere after customers have departed. It is expected that operating schedules and conditions will demonstrate a general duty of care to customers using the premises and others affected by their activities this may include developing a policy to prevent the sale of alcohol to drunk customers.

	10.3	Over the past number of years, Dorset Police have prioritised tackling violence against women and girls and continue to seek opportunities to improve the safety of women and girls in our communities. We are working closely with our partners and community groups to deliver initiatives to raise awareness and promote changes which can make a huge difference to safety of women and girls in our communities. Dorset Police are aware of some excellent initiatives being led and promoted by Pubwatch schemes, partners and other community groups associated specifically with the night-time economy and we recommend that, as part of the list of considerations, that new applicants acknowledge and take reasonable steps to mitigate against the risk of violence against women and girls in our licensed premises. One of the most significant threats to our licensed premises is associated with 'drink spiking', a term that is commonly used to describe the dispensing of a substance to another without their knowledge with the intent to cause that person harm. A substance could include drugs, alcohol or anything that is intended to impact the health and capacity of the victim and can lead to other serious offences, including sexual offences if no intervention occurs. Mitigating violence against women and girls might include specific staff training alongside procedures and policies to support staff to responsibly safeguard women and girls in their premises. It is important to consider protection of women and girls working within licensed premises.	Initiatives relating to tackling violence against women and girls are included in chapter 21. Participation in pub watch or other body is included in the last bullet point This has been included under Public Safety para 11.5 Paragraph 11.3 already includes bullet point which reads • Training of staff to deal with violence against women and implementation of safeguards to protect them
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		Additionally, measures to protect licensed premises, their staff and customers from the serious threat involving weapons should also be considered. Whilst we enjoy relatively low levels of crime and disorder associated with our licensed communities throughout Dorset, it is recommended that new applicants consider reasonable measures to prevent and detect weapons inside their premises. To ensure that our night-time economies remain safe and vibrant, it is imperative that there are robust and consistent policies and practices in place, informed by Dorset Police and our partners, to support applicants to protect their licensed premises against emerging threats.	The last paragraph 10.4 includes recommendations that all applicants discuss crime prevention with the police which should include such measures on a case by case basis. As all applications are referred to the police for consultation specific concerns relating to applications can be addressed at application stage.
	11.3	In support of the above, it may be beneficial to include a recommendation for operators to consider the introduction of a risk assessment for knife and weapon mitigation if appropriate to their premises. This will not apply to all new licensed premises, however, the introduction of simple, cost-effective measures to licensed premises has been evidenced to significantly reduce the number of weapons that are present in our night-time economy areas.	Suggested amendment • Applicants are expected to demonstrate within the operating schedule that consideration and risk assessment has been undertaken to address the risk of knife /weapon use. Where there is a risk particularly in late night on sale venues conditions requiring the use of hand held metal detectors or knife wands should be discussed with the police. • Where knife or weapon crime is identified as a risk premises are encouraged to acquire a bleed control kit kept at the premises with staff adequately trained to use it.
	12.8	The provision of late-night refreshment is popular, and benefits to these provisions include the dispersal of customers away from other licensed premises associated with the provision of alcohol. Dorset Police are grateful for	Dispersal specifically relating to night café and takeaway premises is also discussed within paragraph 12.18

		the recognition that these premises are increasingly associated with noise, disturbance and anti-social behaviour associated with littering etc. Dorset Police would be grateful if there could be recognition for the increased levels of <u>crime</u> that are also often associated with late night take-away premises, caused often by the accumulation of customers gathered in and around the premises. This is most prominent in areas where there is a greater risk of affecting residential properties, however, Town Centre locations are equally problematic due to the lack of control that is often exercised by operators in relation to their customers that are gathered outside or nearby.	Suggested amendment 12.18 Premises open after 23:00 hours supplying hot food or hot drink for consumption on or off the premises can attract large groups of customers, many of whom have already consumed alcohol. The gathering of people around takeaways can lead to additional noise, disturbance and greater amounts of litter and rubbish. In addition this can lead to increased levels of crime and disorder.
	12.20	Further to the above, whilst Dorset Police are grateful for the additional support offered to new applicants seeking to offer late-night refreshment, the adverse impact in terms of ASB, crime and disorder associated with premises offering late night refreshment is increasingly of concern and new applicants should anticipate that Dorset Police will expect appropriate and reasonable steps to be introduced to mitigate against crime, disorder and ASB. As a foundation to any premises with a focus on offering late-night refreshment, Dorset Police will expect consideration to be given to ensuring that appropriate staff training, introduction of policies to identify and safeguard the most vulnerable and mitigation against violence and disorder associated with their premises. Additional conditions will be anticipated based on the nature of the	Suggested amendment to 12.19 add bullet point • Consideration of measures required to address the risk of late night violence and antisocial behaviour by patrons should be evidenced which will include staff training and safeguarding policies. It is anticipated that additional conditions will be offered in the operating schedule based on on the nature of the operating hours, location and other factors which increase the risk of crime and disorder.

		operating hours, location and other factors which increase the risk of crime and disorder further.	
	13.4	Dorset Police are grateful that the recent additions to the Statutory Guidance reflect the increased threat associated with Child Sexual Exploitation (CSE). Protecting children and other vulnerable people from harm is a Dorset Police priority and we would be grateful if the Licensing Authority might consider acknowledging the threat that 'County Lines' drug network have on our communities, particularly in relation to the threat posed to young people exploited by organised crime groups operating these drug distribution networks. This activity might not exclusively impact on licensable activity, however, increased awareness (e.g. training and introduction of policies) of this threat within the licensed communities of BCP Council will support our efforts to tackle this threat and make a significant difference to the lives of the young victims of this serious crime.	Suggested amendment 13.3 The Licensing Authority notes the amended statutory guidance has now placed emphasis on child sexual exploitation (CSE) matters which include, criminal exploitation, county lines, gangs and modern-day slavery. As such it is expected that applicants demonstrate in their operating schedule that suitable and sufficient steps are to be taken to tackle risks specific to their premises. Suggested conditions are provided within Appendix D to address this. Suggested amendment to Appendix D model pool of conditions under Protection of children from harm Considerations for child safeguarding All staff shall be trained in Child Protection Awareness. Such training will include awareness Child Criminal Exploitation and Child Sexual Exploitation, and County Lines identification and reporting. Such training (including any refresher training) will be logged and provided not less than every three years. The training log shall be made available for inspection by Police and "authorised persons" immediately upon request.

			A Safeguarding Log, or Safeguarding Section within the incident book, shall be kept at the premises, and made immediately available on request to the Police or an "authorised person". The log must record all concerns raised with regards to safeguarding and include the following: a. the identity of the member of staff who raised the concern; b. description of the concern raised including details relating to the young person; and c. the action, and justification for such action, undertaken by the member of staff when the concern was raised. Where no action is undertaken, a justification for this shall be required.
	13.16	To support the recommendations and efforts of our Trading Standards colleagues, it may be appropriate to include an acknowledgement of the risk that is posed from proxy-sales from our licensed premises. Throughout most towns, but in Bournemouth and Poole town centres specifically, we have a significant issue with alcohol-related crime and disorder associated with young people. We are focused on reducing the adverse health and welfare impacts that alcohol has on children, however, we are equally focused on ensuring that those juveniles that are intent on causing alcohol-related crime and disorder are managed effectively and supported to improve their behaviour with the support of our partners. Dorset Police expect applicants to ensure that they mitigate against proxy-sales associated with their	Suggested amendment add bullet point to para 13.15 • Proxy sales which is the sale of alcohol to those who then supply it to under 18s shall be considered and mitigated by considering the premises layout, including unobstructed views of the outside area and ensuring measures are in place to train and support staff in challenging this activity as necessary.

		premises through the introduction of appropriate policies and procedures to reflect their premises.	
	15.3	It may be beneficial for the Licensing Authority to include acknowledgement of the impact of proxy-sales to children in this Chapter.	Suggested amendment add bullet point to para 15.4 • Consider measures to minimise the risk of proxy sales including keeping window displays to a minimum, line of sight from register to outside areas and training of staff on who to identify and challenge this activity.
	16.4 & 16.5	In the absence of any Cumulative Impact Areas throughout BCP Council area, it is imperative that Dorset Police consider each application in detail and assess its suitability within the proposed area. Dorset Police area grateful that the Licensing Authority have highlighted some areas of concern where the impact of a new provision on those that are more vulnerable is greater. Dorset Police recommend that the Licensing Authority make specific mention of schools, youth clubs and any premises which primarily or routinely offers services aimed at children. Additionally, the BCP Council area has a variety of properties that focus on the rehabilitation of vulnerable people in our communities. These people can include the homeless, individuals tackling dependencies and people that are being rehabilitated back into our communities. Dorset Police invite the Local Authority to consider recognising these sites as being particularly sensitive and where it would be either difficult or impossible for a nearby licence holder to consistently promote the licensing	Suggested amendment 16.4 The applicant is expected to demonstrate that they understand the local area demographics including crime and disorder hotspots, proximity to residential premises, housing provided for and/or treatment centres aimed at vulnerable people (including addictions), and the proximity to areas where children/vulnerable people congregate such as schools, youth clubs and any premises which primarily or routinely offers services aimed at children.

		objectives when there is a likely risk of crime and ASB including street drinking, alcohol-related crime (e.g. criminal damage and violence) and begging, all of which can have a devastating impact on our communities. Whilst the existing policy includes locations used for the rehabilitation of vulnerable people, locations that are aimed primarily at housing for the most vulnerable should also be introduced to the policy.	
	16.8	Could the Licensing Authority confirm details of the responsible authority with responsibility for supporting Trading Standards with promoting the licensing objective to Protect Children from Harm.	The list of responsible authorities and the contact emails is published on the councils website Premises licence BCP The detail is not included in the policy as the emails and contact details can change during the life of the policy. The website can be updated as needed. Within BCP In addition to the trading standards team all applications are sent to the safeguarding and compliance team for review.
	16.10	To support the submissions above, Dorset Police would be grateful if the Licensing Authority could acknowledge the following matters in the context of promoting the licensing objectives – • Preventing violence against women and girls • Measures to protect the most vulnerable in our communities, including children and those with addictions and other characteristics that place them at increased harm from being exposed to alcohol.	These areas have been covered under specific guidance in chapters 10 - 13. This is paragraph details more general considerations.

	19.2	Dorset Police are exploring alternatives to the Licensed Premises Problem Solving Matrix (LPPSM) and it may be appropriate to remove this from the Policy pending an alternative approach to enforcement.	Suggested amendment to 19.1 and delete 19.2 and replace 19.1 The Licensing Authority has established a joint working agreement with Dorset Police and other enforcing authorities. This agreement assists officers to manage existing premises through a structure of 'Engagement', 'Education' and 'Enforcement' to support licence holders to promote the licensing objectives and provide a positive addition to the communities they serve.
	24.2	Dorset Police invite the Licensing Authority to consider requirements for applicants to consider measures to safeguard against violence against women and girls and to protect those in the community that are particularly vulnerable. Please can the Licensing Authority highlight that ANY exploitation of children, not necessarily always associated with sexually related harm, should be considered by applicants.	Suggested amendment to add a bullet point • Take all reasonable steps to prevent violence against women and girls and to protect anyone who appears to be vulnerable. Suggested amendment to bullet point 8 • To understand that the any exploitation of a child is unacceptable, and a crime. Staff should be made are aware of the need to identify and report any child safeguarding concerns
	24.3	Dorset Police are committed to ensuring that all licensing objectives are consistently promoted. Where concerns are highlighted relating to the objectives to maintain public safety and prevent crime and disorder, Dorset Police will bring concerns to the attention of the Licensing Authority if an agreement cannot be successfully mediated with the applicant.	Noted for information.

		Dorset Police take a preventative approach to supporting applicants to introduce proportionate measures to their applications to protect the community against emerging crime trends and the most serious threats to our society. It may be appropriate for the Licensing Authority to consider highlighting the expectation that applicants will take are reasonable steps to adopt any appropriate initiatives or directions that will help promote the licensing objectives. Most recently, Dorset Police have introduced or supported several initiatives throughout the BCP Council area that demonstrates our commitment to reducing harm associated with the night-time economy, some of which have been highlighted within Chapter 21. Examples of these initiatives include— • Introduction of mobile metal detection arches. • Endorsement for Licensing Safety & Vulnerability Initiative (LSAVI) Accreditation. • UKPAC Information sharing platform. • <i>Clear, Hold, Build</i> initiative to reduce 'place-related' crime and disorder. • Support for BCP Unity Promise – a community-led initiative to tackle violence against women and girls It is our expectation that support of these initiatives, through valued groups such as Pubwatch, are adopted to new and existing licensed premises throughout BCP Council area to ensure that we can collectively respond to the issues that present the highest risk to our communities.	
	24.11	Dorset Police are grateful for the acknowledgement that dispersal of patrons from a licensed premises, particularly	Noted

		during the later hours of the evening or the early hours of the morning can have a detrimental impact on the local community. Dorset Police would support any additional requirements for licensed premises operating during these sensitive times to operate a dispersal policy which reflects the concerns that are highlighted either by Environmental Health or Dorset Police.	
	Additional Proposal	Following several applications and hearings that have occurred throughout Dorset, Dorset Police invite the Licensing Authority to consider the adoption of the following into the Statement of Licensing Policy. This addition is intended to protect against an emerging trend of unsuitable persons operating, controlling, or benefiting from a licensed premises through the use of a substitute operator. This practice is an increasing concern and whilst the obvious risk is towards the community that they serve, there is an additional risk of exploitation against the individual who is often pressured into taking responsibility as the DPS of the premises. This addition to the policy would acknowledge the commitment of the Licensing Authority to ensure that licensed premises are consistently operating to the highest standards. <i>The Licensing Authority has become aware of some concerning practices with persons not identified as a Premises Licence Holder or Designated Premises Supervisor (DPS) having 'control' over a licensed premises, and in effect</i>	Noted the legal officer has suggested this can be added after para at 24.8 with slight amendment to the wording as below <i>Dorset Police have made the Licensing Authority aware of some concerning practices with persons not identified as a Premises Licence Holder or Designated Premises Supervisor (DPS) having 'control' over a licensed premises, and in effect running a premises 'behind the scenes'. This may be for reasons of criminality, for example whereby individuals may possess a relevant offence under the Licensing Act 2003 which would preclude them becoming a DPS. This Licensing Authority takes a very serious view of instances whereby it believes this to be the case and will carefully consider any application made for review of such an existing licence. The Licensing Authority consider the Police to be their main source of advice on matters relating to the promotion of the crime and disorder and will be supportive</i>

		<i>running a premises 'behind the scenes'. This may be for reasons of criminality, for example whereby individuals may possess a relevant offence under the Licensing Act 2003 which would preclude them becoming a DPS. This Licensing Authority takes a very serious view of instances whereby it believes this to be the case. It will carefully consider representations and be supportive of the Police when genuinely exceptional circumstances exist for example, whereby the Chief of Police cites that exceptional circumstances of a case are such that granting an application for a change of a DPS would undermine the crime prevention objective, and evidence exists of such, then it is highly likely that an application would meet refusal.</i> Dorset Police are prepared to support the licensed community with the introduction of <i>Martyn's Law</i>, which is likely to be introduced during the period that this policy is in effect.	<i>of the Police when genuinely exceptional circumstances exist for example, whereby the Chief of Police cites that exceptional circumstances of a case are such that granting an application for a change of a DPS would</i>
Bournemouth Town Pastors	21.2	The statement is inaccurate and should read as follows please: "Bournemouth Town Pastors, established in 2017, are a group of trained Christian volunteers who patrol Bournemouth town centre area from 2200 - 0230 every Saturday night assisting anyone in need. They carry a radio linked to CCTV, police and all pubs/clubs. On their patrols they support individuals who have become vulnerable and assist them to ensure they get home safely. The Town Pastors are also a listening ear to those who may be struggling with any issues. They carry water, flipflops, blankets, portable defibrillator, mobile phone power bank, sick bags, bleed kit, information sheets and many other relevant items."	Noted and suggest amendment to paragraph 21.2 The Bournemouth Street Pastors were established in 2017 they are a group of trained Christian volunteers who patrol the Bournemouth town centre area from 2200 – 0200 every Saturday night. They assist anyone in need. They carry a radio which is linked to the CCTV, police, paramedics and all pubs/clubs. On their patrols they will support individuals who have become vulnerable and assist them to ensure they get home safely. The Town Pastors are also a listening ear to those who may be struggling with any issues. They carry water, flipflops, blankets, portable defibrillator, mobile phone

			power bank, sick bags, bleed kit, information sheets and many other relevant items.
FYEO		I do not think the Late night level should be introduced, we pay enough and the clubs provide a lot to the town	Late night levy is not a consideration at this time.
Individual in BH14 8AZ		Needs alcohol behind the counter for off licenses as staff will not stop people shoplifting.	Off sales are considered in Chapter 15 and can be considered as a condition on a case by case basis if considered appropriate to uphold the licensing objectives.
		Needs dance condition to forbid nudity as described in the sex establishments licensing regime to stop performances which don't happen frequently enough to be covered by that regime.	Sexual Entertainment Venues are regulated under the Local Government (Miscellaneous) Provisions Act 1982 which controls this activity. Sexual entertainment is exempt from the need for a licence if the sexual entertainment being provided takes place on no more than 11 occasions within any period of 12 months, provided that each occasion lasts no longer than 24 hours and that there is a gap of at least one calendar month between each occasion.
		In the interests of public nuisance prevention to stop women being harassed in the streets by customers who have viewed this entertainment.	Initiatives to protect women and girls with licenced premises has been included.
		Needs a maximum capacity and minimum ratio of door staff to customers condition on every license for alcohol on sales, on basis of public safety, prevention crime and disorder and public nuisance and people exploding into the street after being cooped up together start fighting and shouting causing a noise nuisance in the street.	Capacities are determined by a premises fire risk assessment and may change depending on any events or facilities available at a specified time. Premises should review their risk assessments and allocate security resources accordingly if they believe the additional control measure is required.

		Needs a litter bin to be provided for all late night licenses throughout the period of opening clearly visible to customers, plus clearing all litter in a 50 meter radius of the shop immediately on closing.	Cannot blanket condition each application is determined on its own merits. Para 12.19 suggested amendment to bullet point • Provision of bins outside to reduce littering by patrons and consideration of directing staff to keep area outside premises clear of litter.
		Needs a condition that the designated premises supervisor will check and record any security staff SIA pass against another form of photo ID and the facial appearance of the staff and store these records securely.	Where necessary a condition is imposed on licences (and requested on a case-by-case basis) to ensure that the security personnel register is updated daily and a record kept of their ID badge and number. It is an offence under the Security Industry Authority Act to employ a person who is not licensed and a breach of a mandatory Licensing Act 2003 condition.
		Needs a condition that all staff are provided with MHRA approved spiking kits and trained to use them, to test drinks and to test suspected victims.	Paragraph 11.5 addresses this Further advice and guidance should be sought from the Police on how to retain any evidence.
		Public safety. Needs a condition that the areas for waste storage be marked on the filed plan.	The Licensing Act 2003 (Premises Licences and Club Premises Certificates) Regulations 2005 – Part 4 – Plans – do not require waste storage to be marked on the plan.
		For prevention of public nuisance from bins stored insecurely and attracting fly tipping and vermin and prevention crime and disorder as improper storage of waste is a crime.	Cannot blanket condition each application is determined on its own merits.

		Needs a condition to prevent prostitutes soliciting or being pimped out on the premises, for reasons of Public Health statutory duty of the council.	Prostitution is dealt with by the Police outside of the licensing remit.
		Needs a lower maximum people on premises during hours when children are present to ensure staff can monitor that children are not drinking alcohol or at risk from others on the premises who are in drink.	Numbers are not specified under this policy and it is the responsibility for each licence holder to adequately manage their premises.
Individual from BH23 2LX		Proposed changes will have no impact on business/organisation	Noted
Dorset & Wiltshire Fire and Rescue Service	7.4	Change to Dorset & Wiltshire Fire and Rescue Authority	Suggested amendment to bullet point • Dorset & Wiltshire Fire and Rescue Authority
	16.10	Include - The applicant to ensure a suitable and sufficient Fire Risk Assessment is carried out and recorded.	Suggested amendment add bullet point • The applicant to ensure a suitable and sufficient Fire Risk Assessment is carried out and recorded
	Appendix C	Application Process- Layout plan to include locations of fire alarm panel, detector heads, break glass points, emergency lighting and type of extinguisher. Fire Risk Assessment or if the business is not yet trading a commitment to have one carried out.	Appendix C outlines the general application process and it is not felt suitable to add detail within the process. Chapter 11 outlines the public safety considerations. Suggested amendment to para 11.3 amend link Dorset & Wiltshire Fire Service Licensing and events Chapter 16 sets out application requirements. Suggested amendment new paragraph under 16.2 Applications shall include a suitably detailed scale layout plan which includes the following

			• the extend of the boundary of the building, if relevant and any external and internal walls of the building and if different the permitter of the premises • locations of fire alarm panel, detector heads, break glass points, emergency lighting and type of extinguisher. • location of access to and exit from the premises and if different location of escape routes • fixed structures which may impact the ability of individuals on the premises to use exits or escape routes without impediment. • location and height of each stage if relevant • in a case where an existing licensable activity relates to the supply of alcohol, the location or locations on the premises which is or are used for consumption of alcohol • In a case where the premises are to be used for more than one licensable activity, the area within the premises used for each activity • In a case where the premises includes any steps, stairs, elevators or lifts, the location of the steps, stairs, elevators or lifts. • in a case where the premises include any room or rooms containing public conveniences, the location of the room or rooms. • the location of a kitchen, if any, on the premises.
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	Appendix D	Licensing Objective: Public Safety. Fire Risk Assessment. Suggested wording – “ A Fire Risk Assessment (FRA) shall be completed for the premises by a competent person. The FRA will identify the fire hazards, reduce the risk of the hazards and determine the precautions necessary to ensure the safety of all persons in the premises. The FRA should be reviewed periodically and revised when necessary.”	Suggested amendment add new model condition within Appendix D <table><tr><td>Licensing Objective: Public Safety</td><td></td></tr><tr><td>Fire Risk Assessment</td><td>A Fire Risk Assessment (FRA) shall be completed for the premises by a competent person. The FRA will identify the fire hazards, reduce the risk of the hazards and determine the precautions necessary to ensure the safety of all persons in the premises. The FRA should be reviewed periodically and revised when necessary</td></tr></table>	Licensing Objective: Public Safety		Fire Risk Assessment	A Fire Risk Assessment (FRA) shall be completed for the premises by a competent person. The FRA will identify the fire hazards, reduce the risk of the hazards and determine the precautions necessary to ensure the safety of all persons in the premises. The FRA should be reviewed periodically and revised when necessary
Licensing Objective: Public Safety							
Fire Risk Assessment	A Fire Risk Assessment (FRA) shall be completed for the premises by a competent person. The FRA will identify the fire hazards, reduce the risk of the hazards and determine the precautions necessary to ensure the safety of all persons in the premises. The FRA should be reviewed periodically and revised when necessary						
Individual from BH14 8AZ		For late night refreshments could it be a condition that children, ie under 18, are not allowed into the premises nor on any area of the highway granted a pavement license during the hours when a late night license is required. This is because children out alone at that time are vulnerable to being recruited at such venues for potential exploitation.	Each application must be dealt on its own merits if required to uphold the licensing objectives.				

		Could late night refreshment licenses which allow takeaways also have a requirement that the licensee keeps the pavement outside their premises clear of litter during opening hours and provides a litter bin for customers use which is clearly visible throughout hours of opening also. If you believe a requirement that the wrappings use recyclable wherever possible is enforceable, could this be added too.	Cannot blanket condition each application is determined on its own merits. Para 12.19 suggested amendment to bullet point • Provision of bins outside to reduce littering by patrons and consideration of directing staff to keep area outside premises clear of litter.
		Lastly, can we go back to a requirement that I've seen quoted as being in a Bournemouth license, for any Licensing Act 2003 license granted that there will be a presumption that a clause forbidding striptease or other indecent entertainment be added. It could be worded to say "striptease or other indecent entertainment not regulated under Schedule 3 of the Local Govt (Misc) Act 1982". This would catch the less frequent events and the level of nudity which stops short of that defined in Schedule 3.	Sexual Entertainment Venues are regulated under the Local Government (Miscellaneous) Provisions Act 1982 which controls this activity.
		The licensing objective of protection of children would apply because of the ex parte Christian Institute Newcastle remarks regarding people attracted into a neighbourhood by the presence of the indecent entertainment who could be a danger to children, eg recruiting into sex work or committing assaults/harassment.	
Bournemouth & District Law Society		Yes, we have a number of comments on the draft Statement of Licensing Policy. However, in order to make reasoned comments in detail we would have preferred to be able to highlight these by way of tracked changes to the document so that it is easy to see what wording we are referring to by way of response to the consultation.	Noted and referred to Research and Consultation for their information.

		Sadly, the document format as a pdf has made suggestions difficult to address on the document itself. A 'Word' version is required for suggested amendments which would have been much easier to respond to in terms of commenting throughout the document.	Noted and referred to Research and Consultation for their information
		The questions asked by way of a survey as here give little opportunity to drill down into the detail and respond appropriately and to list every point below is time consuming and impractical. It would be exceedingly helpful to be able to comment on the proposals by way of track changes to the actual document.	Noted and referred to Research and Consultation for their information
		In addition, the consultation as advertised on your 'Have your say' website page state on the right hand side that the consultation is open until 6th December 2024 whereas at the bottom of the page it provides the consultation, correctly, as open until 22nd December 2024. There may therefore be a considerable number of interested parties deterred from providing their views as they understood, wrongly, that they were too late to provide their views. It is, therefore, questionable whether this consultation has been properly advertised as available for the appropriate period.	Noted and referred to Research and Consultation for their information This comment is acknowledged and further consultation took place between 27 February 2025 to 13 March 2025, this was published the consultation website and also sent directly to all recognised interested parties including town watch, pub watch, local solicitors and all licence holder. This generated a further two responses from individuals.
		There are a number of typos and reference to Appendix E when there is no Appendix E (should be D).	Noted and amended accordingly
		Some aspects require clarity, for example, Appendix C does not make it clear what the 'Application process' relates to - clearly it is intended for a new Premises Licence but there are a considerable number of other licence applications that can be made to your Licensing Authority for which Appendix C is irrelevant. Anyone not	Suggest amendment to title New or variation to premises licence application process

		understanding the system could be considerably confused. We would suggest the heading to Appendix C makes this clear. Otherwise, the flow chart is helpful for those unfamiliar with the system.	
		On a separate point of clarity, paragraph 13.10 and 13.13 appear to be contradictory in terms of whether conditions requiring the admission of children can or cannot be attached to licences.	Suggest deleted 13.13 and retain 13.10 as is
		As a general observation on reading the whole document, there appears to be a leaning towards a negative impact in respect of businesses at a time when the conurbation and particularly Bournemouth town centre needs to focus on improving the economy and creating a safe, vibrant place to attract visitors for both day and night time retail and leisure activities. Far greater positive support for welcoming and embracing investment in the area is required.	Wider support for businesses is provided by the Council however this document relates solely to the submission of applications and subsequent compliance requirements for licenced premises and seeks to support anyone submitting an application by providing as much information as possible about what is required and what a well run premises is expected to adhere to.
		The document reads rather like a regulatory straight-jacket in terms of expectations of anyone wishing to initiate or grow their business in the area in circumstances where a licence is required. When viewed relative to other geographical areas and other Statements of Licensing Policy it is easy to see how investors and entrepreneurs would choose an alternative location outside the BCP area for their investment. The town is in dire need of some positive action and enticement to attract businesses, not dampen existing ones and deter new ones!	Noted
		The number of issues to which any applicant is required to give consideration in this draft policy is daunting and not for the faint-hearted. Of course, we all support the need to comply with the licensing objectives and to	Noted

		ensure a safe and attractive place for all, and certainly improvement is needed but surely this can be done with a positive outlook. Please focus more on the challenge to attract more good business to the area and improve the economic, social and environmental pillars of the area.	
		Too much of the document concentrates on support for representations and objections to the retail and leisure licensed industries and not how we can all help them generate an improved economic environment.	The detail added in relation to making representations is in response to feedback from individuals who have submitted representations and the difficulties in understanding how personal information is used in this process.
		In respect of specific issues, paragraph 21, it is suggested, could perhaps be better placed as an appendix as much of it relates to general schemes which operate in any scenario, informative but many are not specific solely to licensed premises.	This relates to other mechanisms and schemes that operate to support businesses and protect patrons in the night time economy. It is included as per the guidance document and shows the wider support available within the area.
		Paragraphs under the heading 'Planning and Building Control' do not accurately reflect the fact that planning and licensing are two different regimes and the absence of planning should not, per se, result in a deferral or result in a refusal of the licence application - that would be open to challenge.	Noted
		Please also advise how applications for a premises licence and a planning consent can be considered together when they are different processes and determined by different officers/committees?	The policy does not suggest applying for planning and licensing together but recognises that the Licensing Authority will work closely with planning to ensure where possible the two regimes will align with each other – para 22.3
		Paragraph 22.5 suggests that premises operating in breach of planning permission will be liable to prosecution under planning law - this is not necessarily the case. Although the heading refers to 'Building Control' nothing in the subsequent prose refers to this.	Suggest amendment to para 22.5 as follows: In circumstances when, as a condition of planning permission, a terminal hour has been set for the use of premises for commercial purposes and where those hours are different to the licensing hours, the applicant must observe the earlier

			closing time. Premises operating in breach of their planning permission may be subject to formal enforcement action under planning law.
		The policy is far too verbose and at points distinctly stating the obvious particularly in the new section on 'Management of Premises', for instance, stating that the Licensing Authority encourages licence holders and operators to adhere to all relevant national legislation - this is a given for compliance by any operator, and goes without saying - why does the licensing authority need to refer to 'encouraging' this?	Whilst it is recognised the contents may state the obvious in some areas this is in recognition that not everyone who submits an application may be fully aware of the legislation and has not benefitted from legal or licensing consultant advice during the application process.
		The shorter and more succinct a document the more likely it is to be read.	Noted.
		Having dealt above with the negative impacts, a real positive and helpful inclusion into this draft is Appendix B, Regulated Entertainment Exemptions, which sets out altogether in one place all such exemptions and is an incredibly helpful reference tool for licence holders and operators. The licensing authority are to be congratulated for formatting this in such a way as an appendix to the draft new policy. This is most useful.	Noted and welcomed.
Extended Consultation Responses:			
Lynn Mitcham	General Comment	I consider the sale of alcohol on the beach from any premises is misguided, and particularly from Council-owned premises. This area has a huge problem with alcohol misuse. The alcohol-fuelled violence we see on the streets and read about in the press is merely the tip of the iceberg; there are also a significant number of functioning alcoholics in the area, people who you would not suspect had a problem as their misuse is done at home, out of sight, and they still (often for many years) manage to hold down a job. As a therapist previously	This related to specific premises licences and not the general policy which sets out the expectations of the council for any application. The Policy recognises that applicants should demonstrate understanding of the local area including proximity to treatment centres for vulnerable people including additions – para 16.4

		running an alcohol reduction programme, I came across some of these. Another thing I did not mention last week is the effect alcohol consumption has on people suffering from anxiety and depression. It is amazing how much better such people feel if they just reduce or stop their alcohol consumption. Something few people are aware of. You are also exposing children to alcohol consumption and making it seem “normal”. Alcohol is actually a poison and damages the human body in many ways. Whilst the odd alcoholic drink every now and then will not be a problem, sadly many people cannot stop at that “one” drink. I believe the Council owes a duty of care towards the people within the area for which it is responsible, and selling alcohol from Council-owned premises on a beach is not ethical.	
Karen Baker	General Comment	I have experienced on many occasions, people attempting to buy alcohol, whilst being under the influence of alcohol or drugs/people trying to buy for under-age persons which has provoked violent incidents and a threat to not only staff, but decent customers and the Public at large!! I have also experienced adults, under the influence with children in tow, only to go straight out of the door, open the bottle and take a big swig, whilst the kids are just left on the pavement. These types of incidents are commonplace in Boscombe and can be seen 24/7!! In addition, it takes great courage to refuse an alcohol sale, due to subsequent aggressive/violent behaviours of most of the persons trying to obtain said alcohol, thus facilitating a sales person just to take the easy way out and sell the alcohol to avoid the possibility of further	Noted.

		intimidation. I have also seen this in practice many times in various establishments in Boscombe. Many of the larger stores employ a Security Guard, which doesn't even have any effect, as they have no real power to do anything and the Police will only really get involved if the cost of the goods is over £200 or the salespersons has been verbally or physically abused. So even if they did propose to have a security person on site (CCTV irrelevant) the outcome remains the same. I honestly believe that we don't need any new alcohol licenses and existing sellers of alcohol should be checked and scrutinised in more depth. With Police figures for January 2025 in Boscombe East totaling 244, one has to wonder how many actually involved alcohol. As far as I am aware, BCP has never undertaken an Alcohol Licensing Cumulative Impact Assessment. Maybe it's necessary to do this assessment in accordance with the Nolan Principles to actually see the true picture here, continue to grant new licences, strictly review existing licenses, not to issue new licenses or "cap" the total of licenses?	Consideration of a cumulative impact policy is outlined in section 20, when beginning the drafting of this policy all responsible authorities were asked to provide evidence as per the statutory guidance document which would support the introduction of such a policy. To date this evidence has not been provided.
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