

QUESTION	RESPONSE	RESPONSE	RESPONSE
<p>"It has been recommended that the Cumulative Impact Policy (CIP) within the Statement of Licensing Policy is removed. Reason: There is no longer any evidence to support it. Do you agree with this recommendation? - If you disagree (CIP) please state your reason(s)"</p>	<p>The CIP seems to relate mainly to Yeovil and Chard and does not appear relevant to Bruton so it would be impertinent for Bruton Town Council to express a view</p> <p>No action is required to address this response.</p>	<p>Looking at the harm ranking generated by the HaLO tool, there is evidence that the type and density of premises selling alcohol for consumption are continuing to cause alcohol-harm problems, certainly in Yeovil Town centre LSOA, and to a lesser degree in Chard Central LSOA. When the CIP was introduced it was based on police statistics presented in Appendix B of the current policy statement. You have advised verbally that the police statistics no longer justify having a CIP for these locations. Clearly we have not seen these statistics, but based on HALO data which includes police data there are clear indications that there is significant alcohol harm in these localities, which might tend to suggest that CIP status remains relevant. Caution is also required in relation to the impact of the pandemic and any rebound effects that may occur as the night time economy opens up. Might it not be premature to remove this status at this point, and therefore better to retain CIP and perhaps review in 2 or 3 years-time when the pandemic impacts have worked through?</p>	
<p>"Organisers of large scale events should submit with any licence application supplementary supporting document(s) clearly setting out how the event(s) will be manage. These detailed documents are often referred to as Event Management Plans. Reason: To ensure Responsible Authorities are furnished with adequate detail of proposed plans to enable sufficient assessment of the safe</p>	<p>The wording of the proposed policy is meaningless at best and dangerously imprecise, subjective and arbitrary at worst, and therefore open to abuse. The phrase "sufficiently detailed" begs three questions: How much detail is deemed sufficient? Who is to do the deeming? And what are the criteria of sufficiency?</p> <p>More generally, it is easy for bureaucrats to impose ever more</p>		

<p>management of the proposed event.</p> <p>Do you agree that organisers of large scale events should submit a sufficiently detailed Event Management Plan with their application?</p> <p>- If you disagree events, please state your reason(s)"</p>	<p>stringent, detailed and burdensome bureaucratic conditions on organisers because it is not they that have to bear the cost, only the unfortunate organisers and the members of the public they serve. The overall effect is stifling, discouraging such event and thereby depriving members of the public of much appreciated recreational opportunities.</p>		
<p>Do you have any other comments on the proposed amendments to the Statement of Licensing Policy? If so, please state your reason(s): - comments on the proposed amendments</p>		<p>"There is at present no public health section in the Statement of Licensing Policy, an omission we think should be rectified. The Director of Public Health requests that a section on alcohol harm and public health is added as per the following please:</p> <p>""Alcohol harm and public health</p> <p>The Director of Public Health is a Responsible Authority and will consider evidence of alcohol harm in making representations in relation to licensing objectives, and in the wider context of seeking to improve and protect public health and wellbeing.</p> <p>Public Health (Somerset County Council) has developed a tool called HaLO. The purpose of HaLO is to enable applicants and Responsible Authorities to consider all alcohol-related harms in the relevant local area when dealing with a licensing application. The licensing authority encourages applicants to make use of the HaLO tool, to demonstrate consideration of alcohol harms and any additional steps they intend to take to</p>	

		<p>promote the four licensing objectives as part of their application.</p> <p>The results from the tool will also be used as part of representations from the Director of Public Health to licensing applications and in negotiations with applicants.</p> <p>HaLO is publicly available at: www.somersetintelligence.org.uk/halo/""</p>	
<p>Are there any parts of the current policy that you disagree with? If so, please state your reason(s): - parts of the current policy disagree with</p>	<p>There is no mention of street trading/markets/charter use within this policy. The current policy is burdensome and prohibitive to event organisers like us seeking to work in partnership with the council. A block consent approach, as used by Somerset West & Taunton would be most welcome.</p> <p>Amendments have not been included in the Statement of Licensing Policy as these items fall under a separate Street Trading Policy.</p>	<p>It used to be the practice (if not a formal policy) of the Licensing Authority to inform town and parish councils about applications which might be of interest or concern to them. We recognise that parish councils are not statutory consultees for licensing applications so passing on this information was a matter of courtesy, but Bruton Town Council very much appreciated this practice and would like to see it revived. This would accord with the declared aims and ambitions of the new Somerset Council unitary authority which will be taking over the functions the Licensing Authority in 2023. Somerset Council has promised an enhanced role to town and parish councils via the proposed Local Community Networks, and informing local councils about relevant licence applications would be one way of fulfilling this aim.</p> <p>Amendments have not been included in the Statement of Licensing Policy.</p> <p>All applications, as soon as they are received, are published on the Authority website with details of the application and the closing date for representation to be made.</p>	<p>"Yes 3.9.2 It is expected that all noise-related complaints are initially raised with the Council's Environmental Protection Service and complaints regarding unlicensed activities and operating outside the permitted hours are raised with the Lead Specialist - Environment.</p> <p>This needs to be changed to be in line with current working practices. All noise related complaints must be reported through the report it tool on our website. We do not have an Environment Protection Service anymore and noise sits under the umbrella of Environmental Health and Licensing."</p> <p>This amendment, which is a simple change of wording, has been amended in the Statement of Licensing Policy.</p>

<p>The draft policy includes a new reference to the Climate and Ecological Emergency at paragraph 4.7.2.</p> <p>Reason: To encourage Licence applicants to consider taking steps during event design and delivery to reduce the burden on the environment, whilst at the same time not compromising event safety.</p> <p>Do you agree with this inclusion?</p> <p>- If you disagree Climate, please state your reason(s)</p>	<p>Why add to the complexity of the licence process? Decisions on the scope of 'Climate change' and the steps necessary to reduce the impact adds cost and delay. Any policies in this regard should be stand alone and could then vary as determined by government policy. The public do not need to be lectured on this by any local council.</p> <p>These amendments have not been made to the policy as this in itself is not adding to the licensing process which will take the statutory 28 day consultation period. The inclusion of this is in response to the Climate and Ecological Emergency statement and is intended to remind applicants to consider such things as paper straws or not using single use plastics. Its inclusion is in line with the Council's Environment Strategy and is for consideration only.</p>		
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