

Appendix 2 Consultation Responses

Response 1

1. Page 33 point 37.10 references the area of Hackney and CSE (as opposed to a Hackney carriage), is this a cut and paste error that should read Welwyn Hatfield? This is purely a technical point/observation and does not relate to fire safety matters.
2. Page 38 – Appendix A. In addition to those already mentioned with regard to fire, would you please add ‘Fire Protection department of Hertfordshire Fire and Rescue Service’.
3. Page 40 Appendix B. Contact details for the Fire Protection have changed, the address is - Fire Protection, Hertfordshire Fire and Rescue Service, Postal Point CH0331, Room 346 Old Block, County Hall, Pegs Lane, Hertford, Hertfordshire SG13 8DQ)

Response 2

Introduction The British Beer & Pub Association is the UK’s leading organisation representing the brewing and pub sector. Our members account for 90% of the beer sold in the UK and own around 20,000 of Britain’s pubs.

The pub plays a vital role in community cohesion and social life in Britain. They remain one of the few places where communities can come together to socialise. The British pub has been part of people's lives for hundreds of years. First and foremost, they are businesses which serve their local communities and contribute much to the social life of each and every community. The pub sector has enormous potential to generate economic growth and create jobs. It can also play an important part in local regeneration projects and has been at the heart of the regeneration of many of our key towns and cities over the last fifteen years. A major study undertaken by Oxford Economics in 2018 clearly identifies the significant local impact of brewing and pubs. Currently over £1.5 billion is invested in the pub sector per annum. Indeed, pubs are labour-intensive businesses so this investment directly correlates to jobs. Pubs employ 600,000 people across the UK, often providing vital work in small towns and villages. Indeed, 45% of those employed in the sector are aged 16-24 providing a vital route to work and first career-step for many young people.

Across Britain, 30 million people visit Britain’s pubs each month, with over 15 million people drinking beer.

BBPA’s Support for the Proposed Revisions to the Statement of Licensing Policy (SoLP) Our review of the changes identified in the revised Statement of Licensing Policy Statement noted that these are mostly administrative, bringing the policy up to date.

On the basis that all of the proposed changes are those that have been identified as such on the revised Policy Statement, we can confirm that we are content with the proposed changes subject to the specific points made below.

BBPA’s Feedback on Proposed Revisions to the SoLP

- Paragraph 5.3 – the wording “which encourage people to drink more than they might ordinarily” strikes us as potentially confusing because it requires some subjectivity to determine. This could lead to differing interpretations and therefore inconsistent enforcement. We would suggest that the sentence would still be meaningful if the

wording was be removed so that it instead reads “The aim of the condition is to prohibit or restrict promotions which undermine the licensing objectives”.

- Paragraph 20.6 – we would suggest that “committed” should be replaced with “convicted”.
- Section 28 – we would suggest that greater detail is provided in order to assist businesses that are buying alcohol from wholesalers. For example: • How often are they expected to check their wholesaler’s URN? Is it only on the first occasion that they buy from them, or annually, or some other frequency? • Are businesses expected to retain evidence that they have undertaken this check? • It would be useful if the Policy included the weblink for checking the HMRC online database
- Paragraph 34.2 & 34.7 – we support the re-confirmation that the Council is not considering the introduction of a latenight levy.
- Section 37.10 – this should presumably refer to Welwyn Hatfield rather than Hackney.
- Paragraph 38.9 – it is not clear which legislation is being referred to here. Inclusion of a reference to specific legislation would be helpful.
- Paragraph 38.10 – the use of the word “persistent” without further definition could create confusion due to the level of subjectivity in deciding what “persistent” might mean. We would suggest that greater clarity is given as to how many instances of such sales, how such sales are determined (e.g. test purchases) and within what timescale would constitute “persistent” occurrence of under-age alcohol sales.
- Section 39 – we note this new Section. it would be useful to also include an explanation of the interim steps and process that should be taken. The Licensing Authority should make a determination within 48 working hours of receipt of the application, deciding what interim steps are required, and the premises licence holder has a right to request a hearing after the interim steps are determined. This should be held within 48 working hours of their