

Alcohol Licensing Policy
Any Council
Any Street
Postcode

18th October 2004

Dear Sir/ Madam

As a consumer organisation, with over 72,000 members, The Campaign for Real Ale is keen to ensure that local licensing policies reflect the interests of consumers as well as residents and businesses.

Many of our local branches are involved in commenting on individual local licensing policies. In addition we have produced the attached document, which highlights issues we believe could be beneficially included in local licensing policies.

We would particularly draw your attention to the section on design, character and layout. The design, character and layout of a licensed premise will influence how easily that licensed premise can meet the licensing objectives.

If you have not already heard from your local CAMRA branch please contact me for details of a local CAMRA contact.

I hope that you will have an opportunity to consider some of the suggestions in the attached document.

Yours sincerely

Jonathan Mail
Public Affairs Manager

Local Licensing Policy Comments

1.0 Promotion of the Licensing Objectives

1.1 The following factors will impact on the four licensing objectives and should be taken into consideration:

- The designated premises supervisor's ability to control and supervise customer behaviour
- The number of people attending the premises
- The customer age profile
- The nature of promotions
- The nature of activities provided
- Any evidence of drug misuse and abuse of alcohol
- Design, character and layout of premises

1.2 The design and layout of premises are important in the promotion of licensing objectives. The following are useful control measures, which could be set out in operating schedules:

- Provision of seating
- Retention of room divisions to avoid contagion of any disorderly activity
- Use of separate areas in single room pubs to avoid contagion of any disorderly activity

2.0 Design, Character and Layout

The design, character and lay out of licensed premises will influence how easily a premise is able to meet the four licensing objectives.

- **Character.** Applications that include provision for amplified music, dance floors, pool tables, amusement machines indicate a certain character and target audience with consequences for the licensing objectives. A small scale, traditional style, well run community public house with a mixed or older age customer base is likely to fulfil the licensing objectives with ease.
- **Design.** Good aspects of traditional pub design including room divisions can help attract a more mixed-age and varied range of customers who are unlikely to pose any risk to the licensing objectives.
- **Layout.** The provision of adequate seating and tables is important in encouraging a mixed-age customer base and avoiding overcrowding. The absence of seating and tables may also lead to the faster consumption of alcohol. The position of toilets and bars is also important in seeking to avoid congestion that could lead to frayed tempers.

3.0 Nature of Promotions

- 3.1 Irresponsible promotions can impact on all the licensing objectives. Irresponsible promotions are those that encourage people to drink faster and to drink more, than they would otherwise do.
- 3.2 Price discounts are preferable to two for one offers which can lead to younger drinkers buying two rather than one drink for themselves at the same time.
- 3.3 Happy hours should be spread over a reasonable length of time to avoid a rush to drink as much as possible.
- 3.4 Promotions that encourage consumers to purchase a meal and a drink at the same time are wholly responsible and offer a good example of best practice.
- 3.5 Loyalty schemes run over an extended period of time are an example of good practice. They could be seen as an alternative to happy hours.
- 3.6 “Drink as much as you can” promotions are irresponsible. The inevitable consequence is to encourage people to drink to excess, in order to get value for money.

4.0 Alterations

- 4.1 Premises should not be altered in any way that makes it impossible to comply with an existing licence condition, without first applying for a licence variation.
- 4.2 Applications to remove room divisions and reduce seating provision should generally be resisted. Room divisions, and the provision of seating are often important in the promotion of licensing objectives.
- 4.3 The layout and design of licensed premises will determine its customer base. Traditional public houses are usually small in scale and provide well run, trouble free environments for civilised drinking, typically with an older or mixed- age customer base. The conversion of such premises into modern open plan premises designed to appeal to a younger customer bases is likely to make compliance with the licensing objectives harder to achieve.

5.0 Consumer Consultation

- 5.1 Customers have a stake in the leisure industry and should be consulted on draft licensing policies and asked to contribute to the work of local fora.

6.0 Hours

- 6.1 Longer hours along with varied closing times are important to avoid concentrations of customers leaving all premises at the same time.

6.2 The Local Authority should not necessarily expect licensed premises to open for all the hours applied for in their premises licence or certificate. Licensed premises should however be required to provide an external display of granted hours.

7.0 Licensee Turnover

7.1 A high turnover of licensees is often indicative of problems and can suggest poorly managed licensed premises. Poorly managed licensed premises will make it harder to fulfil the licensing objectives; so policies should discourage the rapid turnover of licensees.

8.0 Planning Permission/ Building Control

8.1 The Local Authority should expect applicants to have obtained any planning permission or building control approval that may be needed before any application will be considered.

9.0 Saturation

9.1 The licensing system should act independently of the planning system and new applications should not be considered on the basis of need.

9.2 Where the cumulative effect of licensed premises within an area gives rise to a decision that new licensed premises are inappropriate, any new applications must still be considered on their individual merits.

9.3 Nothing in a policy should seek to impose a limit on the number of licensed premises.

9.4 Small scale, mixed-age traditional style public houses are unlikely to present any additional risks to the licensing objectives, as they will not be attractive to large groups of young people moving from venue to venue. Indeed such premises are likely to benefit the licensing objectives by encouraging the use of city centres by a wider variety of people.

10.0 Temporary Event Notices.

10.1 Legally a Temporary Event Notice must be submitted to the Local authority only 10 working days notice before the proposed event. CAMRA's view is that this period is too short to allow any objections to be dealt with and could lead to events being cancelled. We therefore believe policies should encourage Temporary Event Notices to be submitted at least 20 working days prior to the event.