

**LICENSING ACT 2003
DRAFT STATEMENT OF LICENSING POLICY
REPRESENTATIONS RECEIVED AND PROPOSED AMENDMENT**

Made by	Representation	Proposed Amendment
Devon and Cornwall Police	Section 15 – to explain more clearly that Objections to Late TEN’ do not lead to a hearing and there is no right of appeal. Appendix C – To read Devon and Cornwall Police as opposed to Constabulary.	We propose to add this information as suggested in Section15.6 We propose to make this change as stated.
Personal Licence Holder	No comment	No action to be taken
Devon & Somerset Fire & Rescue Service	No comment	No action to be taken
BBFC – British Board of Film Classifications	Page 53 – update to film ratings as follows: U - Generally unlikely to unsettle a four-year-old, although it is impossible to predict what might affect any particular child. PG - Should generally not unsettle a child aged around eight, although some scenes may be unsuitable for more sensitive children. 12A - Not generally suitable for children aged under 12. No one younger than 12 may be permitted to attend a 12A cinema screening unless they are accompanied by an adult. 15 - Suitable only for 15 years and over. No one younger than 15 may see 15-rated content in a cinema. 18 - Suitable only for adults. No one younger than 18 may see 18-rated content in a cinema.	We propose to make this change as stated.
Portman Group	Section 20.4 to consider two further additions to this wording: - Words to the effect of ‘ <i>We would encourage retailers to sign up to and abide by Retailer Alert Bulletins</i> ’. - It may also be useful to note that the Secretary of State’s Statutory Guidance under the Licensing Act 2003 states that licensing authorities should, in the exercise of their licensing functions consider whether it is appropriate to impose conditions on licences that require the licence holder to comply with the Portman Group’s Retailer Alert Bulletins – thus giving greater impetus to license holders to abide by the Portman Group Code of Practice.	We propose to add the first additional wording as stated. The second wording is set out in 10.11 – 10.12 of the Guidance issued under Section 182 of the Licensing Act 2005 February 2025. The condition is to be considered on a case-by-case basis and where there is direct evidence of specific incidents linked to the undermining of one of the licensing objectives. It is expected that Trading Standards or the Police would request this condition by way of representation for any applications submitted for premises of concern.

Dawlish Town Council	<p>Section 6</p> <ul style="list-style-type: none"> Where a licensed premises is the last to close after 11.00 p.m., it should be a requirement that the premises employs Security Industry Authority (SIA) accredited door staff. <p>Reasoning:</p> <ul style="list-style-type: none"> Individuals leaving premises that close at 11.00 p.m. are likely to have already consumed alcohol elsewhere and may be using the final venue of the evening to “top up” their alcohol consumption. This pattern of behaviour increases the risk of disorder and anti-social behaviour in the vicinity of late-closing establishments. The presence of SIA-accredited door staff provides an important safeguard for public safety, supports the prevention of crime and disorder, and helps reduce the risk of disturbance to residents – all of which are key licensing objectives under the Licensing Act 2003. <p>Dawlish Town Council respectfully requests that the above condition be incorporated into the revised Statement of Licensing Policy.</p>	<p>Section 6 – current policy relates to higher standards will be expected for premises with hours beyond midnight. This was a time the police put forward many years ago.</p> <p>Section 7 – sets out parameters for imposing of conditions.</p> <p>Section 12 – sets out type of premises that may require door supervisors.</p> <p>We cannot set mandatory conditions on all premises that operate until 11pm to employ SIA accredited door staff. Every application is treated on individual merits. Mandatory conditions are set by the Government, one of these relates to any door staff providing a security role to be SIA accredited.</p> <p>We do not propose making this change. However, we would encourage people to make representations to any individual applications received or make any complaints relating to individual premises providing any evidence to support the complaint.</p>
Public Health Devon	<p>Page 51 to amend telephone number to 01392 383000 (then ask for ‘Public Health’.</p> <p>Generic Briefing for all District Council Licensing teams when approached as part of the consultation process – attached.</p>	<p>We propose to make this change as stated.</p> <p>Generic Briefing – we do not see anything that should be added.</p>