

London Borough of Hammersmith & Fulham

Report to: Licensing Committee

Date: 27 June 2022

Subject: Annual Licensing Committee Report April 2021 to March 2022

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Responsible Director: Sharon Lea, Strategic Director of Environment

Summary

This report provides a summary of the work and performance of the licensing service for the period between 1st April 2021 and 31st March 2022 and includes the following:

- a) Staffing, team performance and work activity in 2021/22.
- b) A financial summary of the team's income and debt.
- c) An update on the status of the current licensing policies in effect.
- d) Details of 2021 - 2022 licensing sub committees (*in Appendix 1 attached to this report*)
- e) Details of all current and concluded appeals in 2021 -2022 (*in Appendix 2 attached to this report*)
- f) Details of complex cases (*in Appendix 3 attached to this report*).

Exempt: Appendix 2 and Appendix 3 are not for publication on the basis that they contain information relating to the financial or business affairs of any particular person (including the authority holding that information) as set out in paragraph 3 of Schedule 12A of the Local Government Act 1972 (as amended).

Recommendations

1. That members of the Licensing Committee note the contents of this report and provide any comments, suggestions or recommendations for the team.
2. That members of the Licensing Committee also endorse the draft Licensing Policy for adoption by Council in July (*in Appendix 5 attached to this report*)

Wards Affected: All.

Our Values	Summary of how this report aligns to the H&F Values
Building shared prosperity	The policies and strategies outlined in this report seek to welcome and encourage responsible licensing operators to the borough. This could bring new business investment, new employment opportunities and more visitors to enjoy their leisure time. Enforcement actions can potentially have a detrimental impact on businesses and as such we are always pragmatic with our enforcement powers by offering businesses compliance advice and guidance in the first instance.
Creating a compassionate council	The service is compassionate to the needs of businesses and residents. The proposed draft revised statement of licensing policy (2022 to 2027) has a strong focus to support woman and vulnerable individuals using the night-time economy. The policy is also very business focused, trying to help new business starting up in the borough.
Doing things with local residents, not to them	The report details the work of the licensing service which includes a reactive response to complaints from residents. Additionally, the team works very closely with residents in relation to licensing applications and we also regularly attend resident's meetings
Being ruthlessly financially efficient	This report includes a finance management section, this outlines the way the service is generating income and ruthlessly managing any debt whilst also having an ethical approach to debt.
Taking pride in H&F	We strive to be the best licensing authority in London and this report details the excellent work undertaken by the team to achieve this goal.
Rising to the challenge of the climate and ecological emergency	One of the legacies of Covid-19 has meant many officers now work from home. This has reduced the amount of time officers spend travelling around the borough on visits, meetings, and licensing hearings. This new way of working has many positives which the team would like to continue to develop in the future.

Financial Impact

For 2021/22 the Licencing Unit managed within its existing service budget of £0.342m. External income generated from licensing activities during 2021/22 (i.e. excluding recharges to other Council departments) was £381,000. This is an improvement of £73,000 (24%) compared to 2020/21 (£308,000). As of 31 March 2022, total overdue licensing debt was £9,933. This is an improvement of £8,282 (45%) compared to 31 March 2021 (£18,215).

Implications verified by Kellie Gooch, Head of finance (environment), 15 June 2022.

Legal Implications

The Council, as Licensing Authority, is required by law to comply with its statutory duties in accordance with the following legislation:

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- Licensing Act 2003
 - Gambling Act 2005
 - Local Government Miscellaneous Provisions Act 1982
 - Local Government Act 1972
 - The Policing and Crime Act 2017
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The Licensing Service produce this Annual Report to the Licensing Committee to evidence how it is discharging its licensing functions and seek feedback on the licensing policies such as the revised Statement of Licensing Policy, the approval of which is reserved to Full Council in accordance with Article 4 of the Council's Constitution.

Implications verified by Jane Astbury, Chief Solicitor (Planning, Property, Licensing and Highways) 15 June 2022

Background Papers Used in Preparing This Report

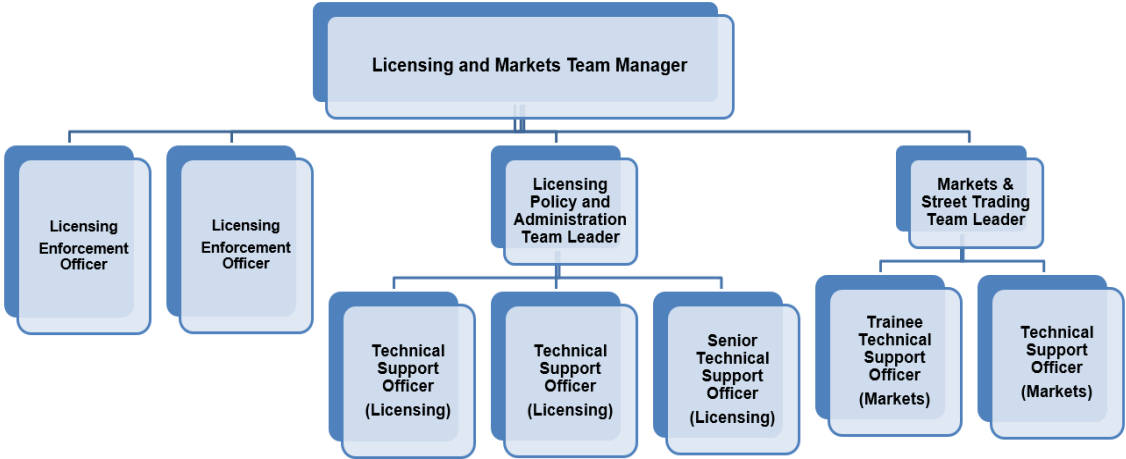
None

DETAILED ANALYSIS

Introduction

1. The Licensing Service covers a wide range of statutory licensing, registration and enforcement functions in the London Borough of Hammersmith & Fulham. These functions cover premises which sell and supply alcohol or provide regulated entertainment or late-night refreshment. We also issue licences for gambling premises, gaming machines and lotteries, street trading, sex establishments and sexual entertainment venues, film classification and scrap metal dealers.
2. The service manages its own finances which includes invoicing businesses, taking payments, chasing and enforcing non-payment of annual fees for all licensed premises.
3. The Licensing Service works in partnership with others including responsible authorities, blue light emergency services, government departments, residents and businesses to promote the licensing objectives, improve public health, reduce crime and disorder and promote a safe and enjoyable night time economy in the Borough whilst ensuring that it is fulfilling its functions efficiently.

Licensing Team Staffing Structure



4. The Licensing Service now also includes the Markets and Street Trading team. This function moved over to the service on 1 April 2021.
5. In January 2022 the Licensing Administration and Enforcement Manager left the service and so some changes had to be made to ensure resilience. The new structure now includes an overall team manager, who is supported by two Team Leader posts, to help with career and personal development, team resilience and succession planning.

Markets and Street Trading

6. This service includes the monitoring, regulation, and enforcement of approximately 119 pitches across the borough including North End Road, Lyric square, Wood Lane, Match Day Football pitches around the 3 main clubs and other miscellaneous sites. We also issue distribution of free literature licences within the approved zones and at approved point of distribution within the borough.
7. Markets and Street Trading is managed using The London Local Authorities Act 1990 (LLAA/The Act.) The Act dictates that no profit is to be made by the Council and provides a specific structure for charges and enforcement, whilst protecting the rights of the licensed trader. The LLAA limits what the Council can charge, as only reasonable costs related to the market operation can be collected. This includes administration, enforcement, street cleaning around trading and collecting and disposing of waste.
8. Day-to-day duties of the markets team include pitch allocations, taking payments, chasing debts, raising invoices, receiving, checking, and issuing street trading licences alongside renewal of existing temporary and permanent trader licences every six to twelve months respectively.

9. Administratively the team must ensure all traders have all the required documentation to ensure trading is safe for both them and members of the public. This includes Public Liability Insurance up to £10 million, Food Safety Certification, LPG-Gas certificates and PAT-Portable Appliance Testing when using gas or electric equipment whilst street trading.
10. Operationally we conduct regular site inspections to all sites, to monitor the site and compliance with the licence conditions and take actions where breaches occur. On a weekly basis Lyric Square and Wood Lane require commercial bags to be distributed
11. Periodically we review and update planning permissions. Look for suitable sites to apply for planning permission and support planning applications from traders.
12. The team work closely with the economy team and the Local BID planning one off special market events and issuing the licences required throughout the year.
13. The markets team are also responsible for managing waste contracts to ensure the cleanliness of the market pitches are maintained to a high standard.
14. We investigate and respond to complaints around licenced street traders, noise, rubbish, overpitching, parking, and instances of illegal street trading with assistance from the Law Enforcement Team and Trading standards.

Income 2021/2022

15. Table 1 below outlines the income received by the service for the period 2021/2022

Table 1: Income generated	2021/2022 '000
Licence Fees	25
Street Trading fees	178
Distribution of Free Literature	5
Total Income	208

Investment in North End Road

16. The markets team are heavily involved in the community-led redesign of North End Road which is focused on providing a long-term enhancement of the market and supporting the growth of existing and new businesses.
17. To date the borough has invested £1.9m into these public realm improvements, including creating seating areas, dwell areas, replacing paving and kerbs, and improving market pitches.
18. The key market pitch improvements include the levelling of all market pitches and the installation of EV chargers and water standpipes. The regeneration works are

scheduled to finish on or before the 24th September 2022. After which the road will be closed for a day to host a seasonal market to celebrate the end of the regeneration.

19. We are actively encouraging new traders to North End Road market and have designed an introductory market trading offer which looks to encourage new traders to the area.

Team performance, work activity and key achievements in 2021/22

Licensing Act 2003

20. The Authority has a statutory duty to carry out its function with a view to promoting the four licensing objectives. These are:
 - The prevention of crime and disorder;
 - Public safety;
 - The prevention of public nuisance; and
 - The protection of children from harm
21. The work of the Licensing Team involves developing and implementing policy, issuing licences, inspections, enforcement, finance management, preparing reports for licensing sub-committee and service improvement.
22. The authority currently has 977 licensed premises (this includes alcohol, gambling, sex establishments and scrap metal premises) and had granted 3824 authorisations for personal licence holders under the Licensing Act 2003. Tables 1 – 9 below illustrate the Licensing Authority’s performance during 2021/22. Data from 2020/21 has been included for comparison purposes.

Applications

23. Table 1 below details the types of applications/notifications processed by the team.

Table 1: Licence/authorisation type	No. of applications received	
	2020/2021	2021/22
New premises licence/ certificate applications	85	96
New personal licence applications	114	127
Premises licence/ certificate full variation applications	28	20
Premises licence/ certificate minor variation applications	29	25
Designated premises supervisor (DPS) variations applications	131	253
Transfers of premises licences applications	64	70
Notification of change of name and/or address, lost licence, DPS removals, interested party notification	134	163

and condition extensions		
Temporary event notices (TENs), Late temporary event notices.	171	486
Total number of applications processed by the team	756	1240

24. Overall, in 2021/22, the service dealt with a total of 1240 applications/notifications under the Licensing Act 2003 compared to 756 in 2020/21. This is an increase of 64%
25. In 2020/21 there were substantially less Temporary Event Notices (TENs) submitted - 171 in 2020/21 compared to 486 in 2021/22 due to the covid pandemic, and covid restrictions, where events were not being held or applied for in the borough. The lifting of covid restrictions resulted in a 184% increase in TENs.
26. There was a 93% increase in DPS variations - 253 in 2021/22 compared to 131 in 2020/21 as the government implemented the roadmap out of lockdown and licenced premises reopened.

Gambling Act 2005

27. The Authority has a statutory duty to carry out functions with a view to promoting the licensing objectives under this legislation. These are:
- Preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime;
 - Ensuring that gambling is conducted in a fair and open way; and
 - Protecting children and other vulnerable persons from being harmed or exploited by gambling.
28. The team issues premises licences for the following; bingo halls, betting shops, adult gaming centres, family entertainment centres and track betting. In addition, the team processes notifications for small society lotteries and gaming machine permits.

Applications

29. Table 2 below details the types of gambling premises in the borough.

Table 2: Types of gambling premises	Total	
	2020/21	2021/22
Adult Gaming Centres	3	4
Betting Shops/ Track Betting	24	24
Bingo	3	3
Total	30	31

30. The data in table 2 shows there has been an increase of 1 Adult Gaming Centre from 3 in 2020/21 to 4 in 2021/22. In addition to the above there are 54 active permits and small society lottery authorisations in effect.

Licensing Sub Committee Hearings

31. Where a representation is made to an application, or a review application is submitted, a sub-committee needs to be arranged to reach a decision.
32. In 2021/22 a total of 32 licensing sub-committee hearings were organised, this is an increase of 41% compared to 19 for 2020/21. A breakdown is provided below. 30 of the hearings were to consider premises under the Licensing Act 2003. 1 application heard was for the grant of a new adult gaming centre, and 1 was heard for the renewal of the Sexual Entertainment Venue (SEV) premises under the Local Government Miscellaneous Provisions Act 1982.
33. Table 3 below illustrates the total number of sub committees.

Table 3: Total number of Licensing Sub Committee hearings organised	2020/21	2021/22
New Premises Licence	10	26
Variation of a Premises Licence	3	4
New Gambling Premises Licence	0	1
Review Applications	5	0
Renewal of SEV licence	1	1
Total	19	32

34. A summary of the decisions made by the licensing sub-committee can be seen in Table 4 below:

Table 4: Licensing Sub Committee outcomes new, variations and renewals	2020/2021	2021/22
Granted/Agreed	1	3
Agreed in part	8	13
Refused	3	9
Disposed / Adjourned*	2	7
Total	14	32

35. As shown in table 3 above, the licensing service did not receive any review applications in 2021/22, compared to 5 in 2020/21.
36. Table 4 includes the number of cases where a sub -committee hearing was convened but was disposed/ adjourned; the licensing service dealt with further cases that received representations and a significant amount of time was spent resolving them prior to the last date for representations, therefore these cases did not need to be heard by the sub-committee.

Appeals

37. Appeals against the decision of the Licensing Sub-Committee can be brought by a number of parties involved in the application and licensing process e.g. the applicant, responsible authorities and other persons who have objected, or a licence holder in the case of reviews. This area of work can take up a considerable amount of time and it is therefore important that the service monitors this work in light of the decisions made and the facts of each case. There can also be substantial financial implications for appeals in terms of legal fees when defending decisions of the Council.
38. There were 2 appeals lodged against the decisions of the licensing sub-committee in 2021/22 the same number as in 2020/21. A full report on all current appeals and appeals heard in 2021/22 can be seen at Appendix 2.

Finance Management

39. Financial management takes up a substantial amount of the team's time. The licensing team generates income from a number of sources including application fees, annual fees, pre-application advice and costs awarded following Appeals or legal action. In addition to managing and overseeing all financial transactions, reconciliation of payments is crucial in allowing officers to suspend premises licences for non-payment of fees, and to take enforcement action where necessary.

Income 2021/2022

40. Table 5 below outlines the income received by the service for the period 2021/2022

Table 5: Income generated	2020/2021	2021/2022
Annual fees	£245,827	£268,527
Application fees	£57,851	£108,025
Covid 19 Fixed Penalty Notices	£3166	£3,333
Pre-Application advice fees	£1056	£1,321
Cost recovery - Appeals, legal cases	£0	£0
Total Income	307,900	381,206

41. The licensing teams income from application fees increased by 86% in 2021/22 as businesses reopened following the lifting of Covid restrictions and applications for TENs increased significantly.

Pre-application advice

42. Since 2015 the Licensing Team has offered a pre-application advice service for small, medium, large licence applications and extra-large events. Table 6 below illustrates the number of requests where Licensing Officers have provided pre-application advice. In 2021/22 this generated £1,321 in income.

Table 6: Licensing Pre-Application Advice	2020/21	2021/22
Small	7	7
Medium	2	5
Large	0	0
Extra-large events	0	1
Total	9	13

43. The pre-application advice service still represents excellent value for money. It enables businesses to seek professional advice on how to apply for a licence at a substantially reduced cost to that of a licensing agent/solicitor.
44. The team will continue to promote the pre-application advice service in 2022/23 to support local businesses. Please note that there is also a proposal in our current draft Statement of Licensing Policy to offer free pre application advice for small independent businesses.

Debt Management

45. Debt management is a priority. The total overdue debt as at 31 March 2022 was £9,933, an improvement of £8,282/45% compared to 31 March 2021 (£18,215). The number of suspension letters issued in 2021/22 was significantly lower than the previous year as the number of overdue licence fees was lower. The team carried out debt recovery calls and visits to licensees in order to support businesses and be compassionate to their needs before issuing suspension notices.
46. Despite the team's best efforts there are some fees which remain unpaid. In accordance with the Licensing Act 2003 if a licence holder fails to pay their annual fee a suspension letter is issued. If a payment is still not received the licence is subsequently suspended. In 2021/22 there were 72 suspension letters issued by the team and consequently 11 licences are currently suspended.

Table 7: Suspensions of premises licences	Suspension letters sent
2020/21	228
2021/22	72

47. Officer's provided

advice and arranged payment plans where needed in order to help those struggling to pay. The team will continue to build an alliance of support, working with local businesses to help them.

Inspection and Enforcement

48. The enforcement team investigates a wide range of complaints from numerous sources, such as residents, councillors, businesses, internal departments or external authorities and government departments. Additionally, officers are actively involved in working with the police following violent incidents or disorder in or

in the immediate vicinity of a licensed premises. This partnership working has been highly effective in tackling crime and disorder in and around licensed premises. This collaborative approach to enforcement is well highlighted in a fortnightly Licensing Action Group meeting (LAG) which all responsible authorities are invited to attend.

49. Table 8 below details the enforcement action taken during the 2021/22 period.

Table 8: Inspection and Enforcement	Output	Total 2021/22
Complaints received	Number of complaints received by the enforcement team	539
Warning letters issued	Number of warning letters issued for breaches of licence	59
Licensing visits/ inspections	Number of visits/ inspections to a premises including checking for compliance, monitoring and test purchases	151
Risk Assessments	Number of full risk assessments undertaken at a premises	35
Advice Given	Number of occurrences where advice has been by enforcement officers including to businesses and residents	576
Number of meetings	Number of meetings with businesses, multi-agency meetings, and residents meetings.	56
Covid 19 inspections	Number of premises visited and full Covid secure inspection undertaken	395
Fixed Penalty Notices	Number of FPNs issued for Covid contraventions	4

50. Table 8 above illustrates that during 2021/22 the team received 539 complaints. 59 warning letters were issued. The preference is to enforce through advice and mutual agreement, where possible and the team actively work with businesses and individuals to advise on and assist with compliance.

51. The enforcement team investigates a wide range of complaints from numerous sources, such as residents, Councillors, businesses, internal departments or external authorities and government departments. Additionally, officers are actively involved in working with the police following violent incidents or disorder in or in the immediate vicinity of a licensed premises. This partnership working has been highly effective in tackling crime and disorder in and around licensed premises. This collaborative approach to enforcement is well highlighted in a fortnightly Licensing Action Group meeting (LAG) which all responsible authorities are invited to attend.

Service Improvements

Data Integrity

52. Data integrity is a continuous project within the team, we have continued to review and improve the recording and management of application and licence data held on the department's licensing database (Uniform) and document management system. We continue to ensure we maximise use of our financial systems to aid in the invoicing of fees and receipting of payments. We continue to review information published on our website to ensure it is kept up to date.
53. The team are working with the digital services team and other business departments to ensure this data integrity is maintained upon migration to a new land and property case management system

Policy Update

54. A summary of all the policies relating to the Licensing Service can be found on the following webpage. <https://www.lbhf.gov.uk/business/licensing/licensing-policy>

Review of the Statement of Licensing Policy

55. The Licensing Act 2003 ("The 2003 Act") requires every Council to have a 'Statement of Licensing Policy' ("SLP") which will include information outlined in the Secretary of State's Statutory Guidance to Licensing Authorities in England and Wales, as amended from time to time.
56. The Council's SLP provides advice and guidance to the Licensing Authority when exercising its statutory functions as a Licensing Authority under the 2003 Act. The SLP is an essential tool to assist Responsible Authorities (mainly Regulators) and the Licensing Committee during the decision-making process to ensure that the decisions reached are sound, and robust enough to withstand an Appeal or judicial challenge. It also provides guidance to both applicants, objectors and professional advisers, and provides key information for any magistrates' court appeals against licensing decisions.
57. The 2003 Act also requires that the Council's SLP be reviewed via public consultation, formally adopted, and published every five years. The latest version of our SLP was published in June 2017 and is next due to be reviewed by July 2022 at the latest. A link to the current policy can be found on the Council's website as follows:

[https://www.lbhf.gov.uk/sites/default/files/section_attachments/statement_of_licensing_policy_2017 - 2022.pdf](https://www.lbhf.gov.uk/sites/default/files/section_attachments/statement_of_licensing_policy_2017_-_2022.pdf)

58. The Licensing Service is currently consulting on the renewal of a draft SLP before the July 2022 deadline. The timetable below outlines the current schedule to ensure that a fully consulted and revised SLP is ready to be taken to a Council meeting on the 13th July 2022.

Activity	Date(s)
Statutory public 6-week consultation BEGINS	13 th May 2022
Strategic Leadership Team (SLT) meeting	25 th May 2022
Political Cabinet	6 th June 2022
Statutory public 6-week consultation ENDS	24 th June 2022
Licensing Committee	27 th June 2022
Council	13 th July 2022

59. The revised policy has been updated to reflect the Council's manifesto commitment to support new businesses and a vibrant night-time economy which is also sensitive to the needs of residents.
60. The draft SLP now has a different style, with three distinct sections, and three new themes, to make it more business friendly and accessible for those with no prior knowledge of licensing.
61. A Council report which details all of the proposed changes to the SLP is attached as Appendix 4. A copy of most the recently amended draft SLP is included as Appendix 5.

Statement of Gambling Policy

62. The Gambling Act 2005 became effective in 2007 and Hammersmith & Fulham published its Statement of Gambling Policy (SGP) in January of that year. Section 349 of the Act 2005 requires all licensing authorities to prepare and publish an SGP that they propose to apply in exercising their functions under the Act during each three-year period to which the gambling policy applies.
63. Any SGP may last for a maximum of three years and can be reviewed and revised by the relevant authority at any time during that period. The Council's SGP was reviewed last year, as it took effect in January 2019 and was due to expire in January 2022.
64. The revised SGP 2022 - 2025 was approved at a Full Council meeting in January 2022.

Enforcement Policy

65. When carrying out enforcement duties within the borough licensing officers must have due regard to the Regulators' Code, which places a number of obligations on local authorities. A link to the Regulators Code can be found here:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/913510/14-705-regulators-code.pdf

66. These obligations include taking a consistent approach to enforcement and being proportionate in response to any licensing breaches. To achieve this, we have adopted an enforcement policy which sets out our general approach to enforcement. A link to the current enforcement policy can be found on this page.

<https://www.lbhf.gov.uk/business/licensing/licensing-policy>

Priorities for the next 12 months (in addition to the Council's Statutory duties under the Licensing Act 2003, Gambling Act and other licensing legislation)

67. The key priorities for the Licensing Team in 2022/23 are as follows:

- a. Help to support the revival of the night-time economy and nightlife in our town centres; with more late licences, in non-residential areas to make H&F an even more attractive place to live and work and to keep money in the local economy rather than people needing to travel into central London for nightlife.
- b. Encourage well-managed late licences in non-residential areas so that restaurants and cafes can profit from a considerate night-time economy.
- c. Respond to public complaints, councillor complaints and other requests for service and investigate within service standards.
- d. Inspect all high-risk premises and ensure that all licensed and gambling premises operating in the Borough are operating in accordance with their licence and the respective Licensing Policy.
- e. Ensure that the licensing team operates in a manner that maximises income by the invoicing of annual fees and maintains systems to identify non-payment of fees and take the appropriate enforcement action whilst being sensitive to the circumstances of local businesses.
- f. Working in partnership with other responsible authorities and key stakeholders to promote the four licensing objectives through a number of ways including the Licensing Action Group (LAG) and the H&F Night-Time Economy Working Group.
- g. Promote the 'Ask for Angela' scheme and making it more visible, as an initiative to protect women and other vulnerable persons using licensed premises in H&F.

- h. To continue to promote the pre-application advice service to assist businesses and increase income and identify other forms of income for the service.
- i. To continue to improve our online application service for businesses and to reduce paper within the service.
- j. To conduct multi agency inspections with partners, i.e. Police, Gambling Commission, Security Industry Authority (SIA), H.M Customs and Revenue, UK Border Agency, Trading Standards, and Environmental Health, in relation to:
 - Late night inspections;
 - Underage alcohol sales;
 - Licence conditions check;
 - Sales of illegal alcohol;
 - Employment of illegal workers; and
 - Gambling premises inspections.
- k. Work in conjunction with the Council's waste service to promote the reduction of single use plastic in licensed premises, targeting the three football clubs and any large events held within the Borough – Polo, boat race etc.
- l. Partnership working with the Police and other agencies such as Barnardos to carry out further Child Sexual Exploitation (CSE) visits at licensed premises.
- m. Reduce the number of incomplete licences issued and continuous service improvement work on the licensing database.
- n. Draft and introduce a revised statement of licensing policy which is welcoming to new businesses, whilst being considerate to residents and protecting the interests of vulnerable individuals.

Equality Implications

- 68. The Council, when taking decisions in relation to any of its functions, must comply with its public sector equality duty as set out in s149 of the Equality Act 2010 (the Act). Enhanced monitoring of our enforcement actions, to better inform future equalities impact assessments, will be carried out on to help us improve service delivery. Our enforcement policy has been reviewed, updated and strengthened to outline our commitment to equality for all and our intended actions to achieve this goal and follow good practice.
- 69. Our enforcement policy contributes towards the corporate priorities of the Council and open and transparent decision making

Risk Management Implications

- 70. The Failure to meet new and existing statutory requirements is specifically addressed in the Environmental Health and Regulatory Services' risk register. Controls are in place to mitigate this risk include; training, internal auditing, periodic updates of the scheme of delegation, performance monitoring and the business planning process

Other Implications

None

Procurement

Not Applicable

Consultation

Not Applicable

List of Appendices:

Appendix 1 - Details of the Licensing Sub Committees

Appendix 2 - Details of Appeals

Appendix 3 – Details of complex cases

Appendix 4 – Draft Council report for the adoption of the Council’s Statement of Licensing Policy 2022 –2027

Appendix 5 – Draft Statement of Licensing Policy 2022 -2027 incorporating recent amendments.