



**Date:** 13<sup>th</sup> August 2015  
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Dear Stewart,

**LA03 – Consultation Response (East Cambridgeshire)**

Thank you for your recent communication regarding the consultation on the statement of licensing Policy for East Cambridgeshire. As you will be aware, since April 2013 Directors of Public Health (DPH) have been included as Responsible Authorities under the Licensing Act 2003. The role of the DPH is to help promote the health and wellbeing of the local populations they serve. Promotion of the licencing objectives, which collectively seek to protect the quality of life for those who live and work in the vicinity of licensed premises and those who socialise in licensed premises is an important contribution to this.

Please find below our comments on the draft policy for your consideration. These comments have been formulated, in part, from Public Health England guidance and examples of good practice from elsewhere.

**Section 1 (page 5)**

Consideration of inclusion of a statement on all the responsible authorities and perhaps a specific reference to Health becoming a responsible authority. Wording may state, for example:

‘County Council Directors of Public Health (DPH) are now responsible authorities with all of the powers and responsibilities this brings. This Licensing Authority acknowledges that DPH will be useful in providing evidence of alcohol- related health harms when there is a revision of policy particularly in relation to cumulative impact policies or early morning restriction orders. This Licensing Authority envisages that DPH’s will also be useful in providing evidence such as alcohol-related A & E admissions or ambulance service data that might be directly relevant to an application under the Act.’

If you feel it is appropriate to include contact details of responsible authorities, these are the contact details for Public Health and Child Protection in terms of licensing:

Public Health:

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The Director of Public Health, C/O Head of Public Health Programmes, Cambridgeshire County Council, Scott House, Box No SCO 2213,5 George Street, Huntingdon. PE29 3AD  
[Kate.parker@cambridgeshire.gov.uk](mailto:Kate.parker@cambridgeshire.gov.uk)

**Child Protection:**

Child Protection Services, Licensing Applications, OCYPS, PO Box 144, St Ives, Cambs, PE27 9AU  
Tel: 0345 045 5203  
[Referralcentre.children@cambridgeshire.gov.uk](mailto:Referralcentre.children@cambridgeshire.gov.uk)

Section 1.98 (page 18) Instead of reading 'i) use of licensed premises for the sale of smuggled tobacco or goods' could this please read:

- o) Use of the licensed premises for the sale or supply of illegal goods.
- p) Use of the licensed premises for the sale or supply of illicit or counterfeit: tobacco and/or alcohol and/or consumer goods.'

***Links to other strategies (page 7)***

The statement of licensing policies will have links to the Health & Wellbeing Board Cambridgeshire Health & Wellbeing Strategy 2012-17.

***Cumulative Impact (page 14)***

A further section referencing Public Spaces Protection Order (PSPO), which replaced the Designated Public Place Order (DPPO) in the Anti-social Behaviour Crime and Policing Act 2014, could be included.

DPPO's continue to be valid for a period of three years following commencement of the PSPO. Once the three year period expires, they are treated as a PSPO and enforceable as such.

Could the policy detail the steps to be followed in considering whether to adopt a special policy within the statement of licensing policy, for example:

- Health Data including the wider public health and local alcohol profiles for England (LAPE) data [www.lape.org.uk](http://www.lape.org.uk)
- Data on alcohol related hospital admissions, alcohol specific hospital admissions and alcohol related deaths in the local area.
- Treatment data on the number of people in the area in a structured alcohol treatment service.
- The identification of concern about crime and disorder, public safety, public nuisance or the protection of children from harm;
- Consideration as to whether there is good evidence that crime and disorder or nuisance are occurring, or whether there are activities which pose a threat to public safety or the protection of children from harm;
- If such problems are occurring, to identify whether these problems are being caused by the customers of licensed premises, or that the risk of cumulative impact is imminent;
- Identification of the boundaries of the area where problems are occurring;
- Consultation with those specified in the Act, and subject to the outcome of the consultation, include and publish details of the special policy in the licensing policy statement.

The above may be supplemented by other local initiatives that seek to address these problems, for example through the East Cambridgeshire Community Safety Partnership in line with the strategic objectives for crime and disorder reduction within the district.

**Early Morning Restriction Order (page 15)**

Could consideration be given to similar wording as outlined in section 1.69, for example:

“however a representation from residents or businesses or a responsible authority may trigger the consideration of implementing an EMRO. The onus will be upon the objectors to provide evidence of the need and benefits of implementing an EMRO.”

**3.0 Licensing Objectives (page 20)**

Can the consideration of proximity to alcohol treatment services be included within this section.

**6.0 Prevention of Public Nuisance (page 24)**

6.6. Could consideration be given to including Alcohol Treatment services in this list.

6.7 Please consider further examples of control measures that impact on health and wellbeing that could be included in this section, for example:

- The license promotes responsible drinking practices and discourages binge drinking e.g. sensible pricing policy.

**7.0 Protection of Children from Harm (page 26)**

7.6 Consideration to the following additions

- Where there is a known association with the provision of illicit tobacco and alcohol
- Where the supply of alcohol is in close proximity to services where young vulnerable people may frequent.

7.7 Please consider further examples of control measures that impact on health and wellbeing that could be included in this section e.g.

- Avoid promotions that target the sales of alcohol at very young people e.g. alcopops

Thank you for taking the time to consider these comments, we look forward to receiving the final document.

Yours faithfully,

**Kate Parker**  
**Head of Public Health Programmes**