



**POLICE & CRIME
COMMISSIONER**
SERVING HAMPSHIRE & ISLE OF WIGHT

Councillor Simon Letts
Leader
Southampton City Council
Civic Centre
Southampton
SO14 7LY

BY Email

Date: 30 July 2014

Enquires to: Lou Parker-Jones

Direct line: 01962 871595

Our reference:

Your reference:

Dear Councillor Letts,

Southampton City Council's Night-Time Levy Consultation

I have considered your proposal for the introduction of the Night Time Levy and my previous position has not changed. As Police and Crime Commissioner I am committed to protecting people and places, and support the proposal to introduce the night-time levy. Initiatives to raise revenue to be spent on making the city's night time economy a safer place is: good for residents; good for visitors; and, good for businesses.

I have carefully considered the evidence and questions contained within the specific consultation documentation. I believe the evidence clearly illustrates the need for the levy. To reiterate, policing the night-time economy places a huge demand upon our limited resources and decreasing budget. Although the constabulary works very closely with the licensing trade and partners to minimise drink-related crime, it is estimated policing the night-time economy from midnight to 6am in Southampton costs £1.6million per year. This of course does not include costs incurred by partners in local authorities, health and even the wider criminal justice system.

I also commend the document for addressing the need to balance the levy in a proportionate manner, such as the proposed exemptions, which I support and the wider benefits the city enjoys from having a vibrant night time.



POLICE & CRIME COMMISSIONER

SERVING HAMPSHIRE & ISLE OF WIGHT

I look forward to developing a mutually beneficial partnership with the council, to ensure the levy is used to the benefit of residents, businesses and visitors.

My commitment I made to the people of Southampton to devote all income generated if the levy is introduced to improving the safety of people using the City's night time economy remains.

I look forward to learning of the outcome of your consultation.

Yours sincerely,

Simon Hayes

Police and Crime Commissioner for Hampshire and Isle of Wight

Offices: First Floor, 2nd Floor, Southampton City Hall, Hampshire

St George's Chambers, St George's Street, Winchester, Hampshire, SO23 8AJ

01962 871 595 opcc@hampshire.pnn.police.uk www.hampshire-pcc.gov.uk

Protecting People & Places

Consultation Question 1

(a) Do you agree that the costs of policing and other arrangements for the reduction or prevention of crime and disorder in connection with the late-night supply of alcohol are a fair assessment?

YES

(b) Do you think that any of the costs ought not to be taken into account?

NO All costs identified are appropriate

(c) Do you think that there are other costs that should be taken into account?

Other costs which should be considered include support to victims, wider criminal justice costs

Consultation Question 2

(a) Do you agree with the assessment of crime and disorder in connection with the late-night supply of alcohol?

YES

(b) Do you think anything has been left out?

NO

(c) Do you think that anything mentioned should not be taken into account?

NO

Consultation Question 3

(a) Do you agree with the assessment of the benefits of the Night Time Economy in the City?

YES

(b) Do you think there are any other benefits?

NO

(c) Do you think that any benefits mentioned are not relevant?

NO

Consultation Question 4

(a) Do you have any comments on the potential income that the levy may raise?

It is appropriate the businesses and users of the NTE result in making Southampton an even safer city. The proof of the potential levy revenue raising ability will be reflected in the desire for participating organisations to continue to trade during those hours.

Consultation Question 5

(a) Do you agree that there is a need to raise the revenue that a levy may produce?

Given the financial challenges the Police and Crime Commissioner is facing to provide a strong frontline policing service the levy will go some way to supporting his vision.

(b) Are there any other issues that you would like the Council to consider?

The Commissioner would like to consider the value of 'pubs' within the community as a source of bringing the community together and providing jobs. The Commissioner would not wish for the introduction of the levy to result negatively upon the industry.

Consultation Question 6

(a) Do you agree that it is desirable to raise the revenue through a levy to be used by the police and the Council?

YES

(b) Have you any comments on the considerations expressed in section 4?

NO

(c) Are there any other matters which you think that the Council should take into account in deciding whether it is desirable to introduce a levy?

Please refer to the Commissioner's supporting letter

Consultation Question 7

(a) Do you agree that the Late Night Supply Period should be a period that begins at one minute passed midnight and ends at 6am? What are your reasons for this?

The timings appear appropriate given the level of ASB reported and VAP.

Consultation Question 8

(a) Do you agree that prescribed premises providing overnight accommodation should be exempt? Please explain your views.

YES – as per your statement

Consultation Question 9

(a) Do you agree that prescribed theatres should be exempt? Please explain your views.

YES – as per your statement

Consultation Question 10

(a) Do you agree that prescribed cinemas should be exempt? Please explain your views.

YES – as per your statement

Consultation Question 11

(a) Do you agree that prescribed bingo halls should be exempt? Please explain your views.

YES – as per your statement

Consultation Question 12

(a) Do you agree that prescribed Community Amateur Sports Clubs should be exempt? Please explain your views.

YES – as per your statement

Consultation Question 13

(a) Do you agree that prescribed Community Premises should be exempt? Please explain your views.

YES – as per your statement

Consultation Question 14

(a) Do you agree that prescribed Country Village Pubs should NOT be exempt? Please explain your views

YES – as per your statement

Consultation Question 15

(a) Do you agree that prescribed BID premises should NOT be exempt? Please explain your views.

YES – as per your statement

Consultation Question 16

(a) Do you agree that premises that only operate on New Year's Day between midnight and 6am should be exempt? Please explain your views.

YES – as this is a national celebration and encourages those who do not use the NTE often to experience it.

Consultation Question 17

(a) Do you agree that prescribed premises that receive Small Business Rate Relief should NOT be entitled to a reduction in the levy? Please explain your views.

YES – as per your statement

Consultation Question 18

(a) Do you agree that at this time members of business-led Best Practice Schemes should NOT be entitled to a reduction? Please explain your views.

YES – as per your statement

(b) Do you agree that such a scheme should be developed? If so, what should be in the details? How can it be developed? How will it be led?

No specific opinion on this matter

(c) If such a scheme were to be developed, do you agree that members should be entitled to a discount?

It would be appropriate to reward, as any assistance business can give to reducing the burden on public services could be far more significant than the money raised via the Levy.

Consultation Question 19

(a) Do you agree that the net revenue from the levy should be split 70:30 between the Hampshire Police and Crime Commissioner and the Council?

Please explain your views.

Policing the Night time economy places a significant financial burden upon the Police and Crime Commissioner for Hampshire and therefore it is appropriate he receives at least 70%.

Consultation Question 20

(a) Do you have any comments on the range of activities which the Council would wish to develop using its share of the levy revenue? Is there anything else that you would like to see? Please explain your views.

The areas identified appear appropriate; indeed the Commissioner already supports a number of these initiatives.

(b) Would you support developing a single programme delivered in partnership between the Council and the police? What would you like it to cover? Please explain your views.

The Commissioner looks forward to discussing these proposals further with the Leader.

I would however like to draw your attention to the role of the police and crime panel. The Panel's role is purely for scrutiny and support. It is for the electorate to hold the Commissioner to account through the ballot box.

Consultation Question 21

(a) Do you agree that the Council should seek to implement the LNL on 1st February 2015? Please explain your views.

It appears sensible to reduce the administrative burden incurred by combining the collection of the levy and the annual fee.

(b) If you think that the LNL should be implemented on a different date, what date do you propose? Please explain your views.

n/a

(c) Have you any other comments on the proposed timetable? Please explain your views.

None

Southampton City Council

Consultation on the proposal to introduce a
Late Night Levy

Response by Punch Taverns plc.



Punch Taverns is one of the UK's leading pub companies with a portfolio of around 3,500 leased pubs nationwide, ranging from pub restaurants to traditional drink led locals. Our aim is to become the UK's highest quality, most trusted and best value leased pub company. Our premises are operated by thousands of enterprising individuals – our Partners - who are running their own pub businesses in our premises.

In 2005 we took the decision to hold the premises licence for our estate. Although we do not undertake licensable activities in our leased pubs, the holding of the premises licence imposes upon our business a significant obligation in terms of licensing regulation and compliance.

Corporate Social Responsibility (CSR) is embedded across many elements of our business, from corporate fundraising to responsible retailing. We have dedicated teams in place to assist in ensuring that our premises operate to the highest standards.

As Portman Group signatories and supporters of Drinkaware we do not condone irresponsible promotions and pricing of alcohol, and we have actively supported the 'Why let good times go bad?' campaign to tackle excessive drinking amongst 18 to 25 year olds.

Responsible retailing forms a key part of our Partner training, and many of our Partners have completed our responsible retailing training. We also provide Risk Management manuals to our Partners, which give clear guidance on current legislation and best practice, backed up by the support of our Risk and Compliance Teams, who provide specialist advice and guidance. We also support the BBPA's Customer Unit Awareness Campaign, part of the Association's contribution to the Government's Alcohol Responsibility Deal by making information and publicity available to our Partners.

To further support our Partners, we launched "The Punch Buying Club" offering our Partners a 24/7 online service allowing Partners to access a huge range of tools to help run their business including online training, regional workshops, legislative updates and Risk Management material such as mandatory signage and many other such materials.

All of our Partner Development Managers (PDM's) are trained to a minimum of BII level 4 in Multiple Retail Management, which consists of eight modules including communication, negotiating, business knowledge and marketing. We believe a well-trained, talented and high performing team will help our Partners reach their potential and ensure their premises are well run.

We also have a number of other specialist employees to ensure that our Partners are provided with the best knowledge throughout their relationship with Punch Taverns; our recently appointed New Business Managers are in place to provide our Partners with up-weighted assistance and support for all newly launched businesses during their first six months of trading. This provides a platform for success and ensures they understand everything for running a safe, legal and compliant business.

We believe that Punch Taverns is in a uniquely qualified position to make a valuable submission as, not only do our circa 3,500 premises cover nearly every local authority area in England and Wales, but we also have significant experience and knowledge of the Licensing Act 2003, the Police Reform and Social Responsibility Act 2011 and associated relevant legislation.

We fully support the view that premises should be well run and promote the four licensing objectives. We do not however, support the view that those premises or indeed any premises should be obliged to pay a levy in addition to licensing fees, business rates and general taxation. The Licensing Act 2003 and associated relevant legislation contain sufficient safeguards and means of dealing with premises that cause or contribute to crime and disorder.

It should not be forgotten that many premises that are permitted to supply alcohol beyond 00.01 will have conditions on their premises licences requiring the employment of door staff, the installation and use of a CCTV system and other such conditions, which result in a one off or ongoing cost to the premises in terms of compliance. These premises, if the Late Night Levy ("LNL") is adopted, will have to, in addition to bearing the expense of the foregoing, pay the levy (if they do not want to reduce the hours for which they are currently legally entitled to supply alcohol).

Whilst it is no doubt the case that the budgets of both the Police and the Authority are under pressure, licensed premises pay their annual licensing renewal fee, their business rates and other taxes. Licensed premises being required to pay another tax would be most unwelcome. For some businesses the LNL will simply be unaffordable. It is quite likely the case that very many licensed premises that trade during the proposed LNL supply period, will be required by conditions on their premises licences to incur expense regarding the installation and operation of CCTV systems, the employment of SIA registered door staff, the use of polycarbonate containers, etc. These conditions would have been imposed to promote the licensing objective of the prevention of crime and disorder. To be required to incur the expense of compliance with conditions and in addition to pay the LNL when the likelihood of there being additional policing or other arrangements is most unwelcome to say the least.

QUESTIONNAIRE

Please complete and return this questionnaire by 31st July 2014

BY E-MAIL to: licensing.policy@southampton.gov.uk

BY POST to: Late Night Levy Consultation, Licensing, Southampton City Council, PO Box 1767, Southampton. SO18 9LA

Consultation Question 1 – COSTS

- (a) Do you agree that the costs of policing and other arrangements for the reduction or prevention of crime and disorder in connection with the late-night supply of alcohol are a fair assessment?
- (b) Do you think that any of the costs ought not to be taken into account?
- (c) Do you think that there are other costs that should be taken into account?

Response

- (a) The costs analysis in the document is incomplete. We therefore do not agree that the cost for policing assessment is a fair reflection of the true cost.
- (b) We suggest the removal of costs relating to anti social behaviour in the city centre. The statistics suggest that 30% of violent crimes are linked to offenders 'in drink' but not whether the fact that alcohol is present is a critical factor. The caveat given thereafter that such a statistic is of limited value seems at odds with it being part of the consultation.
- (c) No

Consultation Question 2 – CRIME AND DISORDER

- (a) Do you agree with the assessment of crime and disorder in connection with the late-night supply of alcohol?
- (b) Do you think anything has been left out?
- (c) Do you think that anything mentioned should not be taken into account?

Response

- (a) The police statistics do not give a fair reflection of crime and disorder attributable to premises expected to pay the LNL. Police statistics have, in recent years, been criticised in both licensing hearings and more generally by public bodies and the press for failing to give an accurate reflection of the true figures and our sense from what has been provided to support the introduction of the LNL is that these figures require further scrutiny and evaluation to give an accurate reflection of crime and disorder due to (mainly on-) licensed premises selling alcohol in the proposed LNL period.
- (b) For the reason given above, we cannot say.
- (c) For the reason given above, we cannot say.

Consultation Question 3 – BENEFITS OF A NIGHT TIME ECONOMY (“NTE”)

- (a) Do you agree with the assessment of the benefits of the NTE in the City?
- (b) Do you think there are any other benefits?
- (c) Do you think that any benefits mentioned are not relevant?

Response

- (a) Yes. However, it is telling that there has been no attempt to quantify the benefits as has been the case for the alleged detriment considered to come from the NTE.
- (b) Indirect benefits appear to have been left out. These include: attracting students to study in the city, cultural/ music events organised by late night operators (often during the day and outside of the levy

- period), sponsorship of local sports teams, the ability to attract notable live music acts (often paid for by having late night after show night clubs etc), diversity of venue type, employment in other areas on the back of a NTE, such as service industries, breweries, entertainment providers etc.
- (c) No. All these factors need to be taken into account along with direct benefits such as taxation etc.

Consultation Question 4 – INCOME FROM THE LNL

- (a) Do you have any comments on the potential income that the levy may raise?

Response

- (a) We feel that the figures quoted are optimistic. Many premises will have very limited provision for hours into the LNL period and will therefore seek to remove them. This will reduce the income levels. For instance, operators such as JD Wetherspoon have widely publicised that they will reduce their hours to avoid paying the levy. Our tenants may well seek to do the same.

We also have concerns that any monies raised will not be sufficient to ensure the Authority can properly comply with its obligations under regulation 8 of The Late Night Levy (Application and Administration) Regulations 2012 and still make raising a levy worthwhile when balanced against the direct losses via taxes, potential rate reductions following rent reductions etc.

It would appear that there has been no consideration of 'hidden' costs of introducing a LNL. These include:

- TEN's applications that will require processing and will in all probability lead to more hearings if the police object as a means of seeking to get premises to vary their licence to pay a levy
- Applications to vary licences to increase hours
- Chasing the inevitable unpaid levy contributions
- Prosecutions for trading when suspended

Consultation Question 5 – NEED TO RAISE REVENUE

- (a) Do you agree that there is a need to raise the revenue that a levy may produce?
(b) Are there any other issues that you would like the Council to consider?

Response

- (a) It is accepted that revenue raising measure need to be considered within the framework of the statute and the reasons for its introduction. However, the LNL was not introduced and cannot be used to limit the savings that the Police and the Authority need to secure their budgets going forward.
- (b) History has shown that administrative costs in relation to the Licensing Act have been generally higher than those set out in the initial consultation documents from central Government. We have no reason to believe that the implementation of the LNL will be any different. Even the process of checking licences to determine who has to pay the levy will require time and expertise and is not as simple as checking the hours. Many licences have conditions on them that would permit trade into the proposed levy period. For this reason, as well as our concern that there has been a general underestimation of the true cost of administration of the process, we feel that the LNL will not raise enough money to serve its statutory purpose, or to make the process worthwhile.

Consultation Question 6 – DESIRABILITY OF THE LNL

- (a) Do you agree that it is desirable to raise the revenue through a levy to be used by the police and the Council?
- (b) Have you any comments on the considerations expressed in section 4?
- (c) Are there any other matters which you think that the Council should take into account in deciding whether it is desirable to introduce a levy?

Response

- (a) We do not agree that the Late Nigh Levy is fair, equitable, or even particularly viable means of raising revenue.
- (b) Section 4 does not fairly compare the benefits vs risks of a vibrant NTE. The risks are quantified but the benefits are not.

There is also no mechanism for paying the fee in daily, or even in monthly instalments, which means that licence holders will be required to find £768.00 annually (if in band B) or for premises in Band C, £1,259 annually. The penalty for not paying is suspension of the premises licence.

Smaller individual and multiple operators, such as Punch tenants, face cash flow challenges at the best of times and therefore finding a significant amount of cash to pay the annual fee is likely to lead to increased hardships that appear to have been simply dismissed out of hand in the consultation in particular by quoting a daily cost figure.

- (c) It is very difficult today to say that premises fall within fixed 'categories' of operation, such as pub, restaurant or nightclub. As such, We have concerns for the diversity and attractiveness of the NTE in Southampton if the levy is introduced. Those small bars/cafe's and other premises that benefit from later hours for sale and supply of alcohol but do not necessarily make much income from it may be forced to reduce their operating hours.

The reality is that only those premises who directly benefit from the sale of alcohol would pay the levy. The consequence is a less attractive NTE with all the problems that a limited offer brings, such as less diversity and a return only having nightclubs and larger premises staying open later into the night.

In addition, The LNL may deter investment by existing operators and new operators in premises in the mid to long term.

Consultation Question 7 – LATE NIGHT SUPPLY PERIOD

- (a) Do you agree that the Late Night Supply Period should be a period that begins at one minute passed midnight and ends at 6am? What are your reasons for this?
- (b) If you think that the Late Night Supply Period should be for a different period, what should be the hours? What are your reasons for this?

Response

- (a) No
- (b) We do not agree that the authority should adopt the LNL at all. However we submit that it should begin at 2.00am and end at 6:00am. We feel that after 2.00am it is reasonable to consider that that diversity of premises continuing to sell alcohol is sufficiently reduced that the LNL will only apply in reality to late night operators.

Consultation Question 8 – EXEMPTIONS – OVERNIGHT ACCOMMODATION

- (a) Do you agree that prescribed premises providing overnight accommodation should be exempt? Please explain your views.

Response

- (a) Yes, on the basis that the exemption should only apply to permit the supply of alcohol to those who are staying at the premises, for consumption on the premises. Such premises are unlikely to cause any problems in the NTE hours in Southampton.

Consultation Question 9 – EXEMPTIONS – THEATRES

- (a) Do you agree that prescribed theatres should be exempt? Please explain your views.

Response

- (a) Yes. We hold the view that these premises should be exempt on the basis that the supply of alcohol is ancillary to their business and they are unlikely to contribute to any crime and disorder issues that affect the NTE during the proposed supply period. The exempt supply should end at the conclusion of the film or theatre production.

Consultation Question 10 – EXEMPTIONS – CINEMAS

- (a) Do you agree that prescribed cinemas should be exempt? Please explain your views.

Response

- (a) Yes. We hold the view that these premises should be exempt on the basis that the supply of alcohol is ancillary to their business and they are unlikely to contribute to any crime and disorder issues that affect the NTE during the proposed supply period. The exempt supply should end at the conclusion of the film or theatre production.

Consultation Question 11 – EXEMPTIONS – BINGO HALLS

- (a) Do you agree that prescribed bingo halls should be exempt? Please explain your views.

Response

- (a) Yes. We hold the view that these premises should be exempt on the basis that the supply of alcohol is ancillary to their business and they are unlikely to contribute to any crime and disorder issues that affect the NTE during the proposed supply period. The exempt supply should end at the conclusion of the playing of bingo.

Consultation Question 12 – EXEMPTIONS – COMMUNITY AMATEUR SPORTS CLUBS

- (a) Do you agree that prescribed Community Amateur Sports Clubs should be exempt? Please explain your views.

Response

- (a) No. Such premises are as likely to be a cause of the problems in the NTE that the LNL is meant to tackle as smaller premises that are not exempt. It could therefore give such premises an unfair advantage.

Consultation Question 13 – EXEMPTIONS – COMMUNITY PREMISES

- (a) Do you agree that prescribed Community Premises should be exempt? Please explain your views.

Response

- (a) No. Such premises are as likely to be a cause of the problems in the NTE that the LNL is meant to tackle as smaller premises that are not exempt. It could therefore give such premises an unfair advantage.

Consultation Question 14 – EXEMPTIONS – COUNTRY VILLAGE PUBS

- (a) Do you agree that prescribed Country Village Pubs should NOT be exempt? Please explain your views.

Response

- (a) Yes. Such premises are as likely to be a cause of the problems in the NTE that the LNL is meant to tackle as smaller premises that are not exempt. It could therefore give such premises an unfair advantage.

Consultation Question 15 – EXEMPTIONS – BUSINESS IMPROVEMENT DISTRICTS (BID)

- (a) Do you agree that prescribed BID premises should NOT be exempt? Please explain your views.

Response

- (a) Yes. BIDs are more widely targeted and do not generally focus on the reduction of crime and disorder, as such they should not be exempt.

Consultation Question 16 – EXEMPTIONS – NEW YEAR'S EVE/DAY

- (a) Do you agree that premises that only operate on New Year's Day between midnight and 6.00am should be exempt? Please explain your views.

Response

- (a) Yes. Many premises only have this extension on their licence which would, unless exempted, require them to pay the LNL.

Consultation Question 17 – REDUCTIONS – SMALL BUSINESS RATES RELIEF

- (a) Do you agree that prescribed premises that receive Small Business Rate Relief should NOT be entitled to a reduction in the levy? Please explain your views.

Response

- (a) No. Of all the premises that may be affected by a levy that may be adopted, these are some of the premises that can least afford to pay it.

Consultation Question 18 – REDUCTIONS – BUSINESS-LED BEST PRACTICE SCHEMES

- (a) Do you agree that at this time members of Business-Led Best Practice Schemes should NOT be entitled to a reduction? Please explain your views.
- (b) Do you agree that such a scheme should be developed? If so, what should be the details? How can it be developed? How will it be led?
- (c) If such a scheme were to be developed, do you agree that members should be entitled to a discount?

Response

- (a) No. It is very short-sighted not to incentivise such schemes with a LNL reduction. Ignoring best practice may lead to a lowering of standards in Southampton as premises refuse to involve themselves in schemes where the council fail to recognise any benefit in doing so. It is dismissive of those premises that work hard and spend money to improve standards not to be rewarded for that effort.

We believe that the partnership approach, engendered by best practice schemes provide the best means of ensuring best practice.

- (b) Best practice schemes, whether Best Bar None, Purple Flag or other schemes, such as the City of London's 'Safety Thirst' scheme all require buy-in from the premises and all have costs associated with achieving the standards expected. As such, seeking to establish such schemes without the incentive of an immediate reduction in the LNL for participating members simply will not work.
- (c) Yes

Consultation Question 19 – SPLIT LEVY BETWEEN POLICE & COUNCIL

- (a) Do you agree that the net revenue from the levy should be split 70:30 between the Hampshire Police and Crime Commissioner and the Council? Please explain your views.
- (b) If you think that the Hampshire Police and Crime Commissioner should receive a larger (than 70%) proportion of the net revenue, please state what percentage you propose? [N.B. It is not possible to reduce the proportion to below 70%.] Please explain your views.

Response

- (a) Yes
- (b) N/A

Consultation Question 20 – USE OF THE REVENUE

- (a) Do you have any comments on the range of activities which the Council would wish to develop using its share of the levy revenue? Is there anything else that you would like to see? Please explain your views.
- (b) Would you support developing a single programme delivered in partnership between the Council and the police? What would you like it to cover? Please explain your views.

Response

- (a) The money must be spent on the reduction or prevention of crime, the promotion of public safety, the reduction or prevention of public nuisance, and cleaning of any relevant highway or relevant land in its area.

Regulation 8 of The Late Night Levy (Application and Administration) Regulations 2012 is prescriptive regarding how the Licensing Authority must apply its proportion of any monies raised by the adoption

of the LNL. The police are under no such obligation and there remains a serious concern that the money raised will be used otherwise than to benefit those parties paying the LNL.

We are not convinced that the LNL will raise the amounts of money anticipated, as a significant number of permissions within Southampton are likely to be withdrawn, by way of the free minor variation procedure. A proper assessment of the benefit against the cost of introduction needs to be carried out.

Notwithstanding our objection to the LNL in principle, any money should be spent on schemes that have the maximum benefit for the most premises in the borough made to pay. This would include additional policing on the streets during the levy period and prosecutions against individuals who break the law during the levy period.

(b) Yes, please see our answer above.

Consultation Question 21 – IMPLEMENTATION DATE & TIMETABLE

- (a) Do you agree that the Council should seek to implement the LNL on 1st February 2015? Please explain your views.
- (b) If you think that the LNL should be implemented on a different date, what date do you propose? Please explain your views.
- (c) Have you any other comments on the proposed timetable? Please explain your views.

Response

- (a) No. We feel that further detailed research is required to fully understand whether there is any benefit in introducing a LNL. At the very least this would need to assess:
 - Costs to the police and council of managing the NTE during the proposed LNL period
 - Benefits in financial terms of the NTE during the proposed LNL period
 - Other mechanisms for raising income and/ or managing the NTE
- (b) Until such work is undertaken, a date should not be committed to. A further consultation would also need to be undertaken on the basis of the findings detailed above.
- (c) Of significant concern to licensees and pub companies alike is that this consultation is being run alongside the Home Office consultation on fees. There are recommendations in that consultation which, if implemented, would duplicate some elements of the LNL in terms of increasing fees for operators that trade into the night. We suggest that at the very least, this consultation needs to be postponed until the results of the fees consultation are published and any changes to the fees structure are introduced.

PERSONAL DETAILS

FULL NAME: Steven Buckley, Compliance & Risk Manager

TELEPHONE NUMBER: Tel: 01283 523514 / Mobile: 07715 054354

ADDRESS:

Risk Management Team

Punch Taverns

Jubilee House

Second Avenue

Burton upon Trent

DE14 2WF

EMAIL ADDRESS: steven.buckley@punchtaverns.com

A Licence Holder

Likely to be subject*

HAVE YOU ANY OTHER COMMENTS THAT YOU WISH THE COUNCIL TO CONSIDER?

CONFIDENTIALITY

The Council cannot guarantee that any information that you pass to us can be treated as confidential. The Council is subject to a number of regimes that affect disclosure, including the Local Government (Access to Information) Act 1985, the Data Protection Act 1998, the Freedom of Information Act 2000 and the Environmental Information Regulations 2004. In particular, your response is likely to be classed as a background paper to future committee reports and open to public inspection.

From: Jason Wiseman
To: Licensing Policy
Subject: Late Night Levy Consultation
Date: 12 May 2014 19:08:15

Dear Sir,

I have read your letter with some interest, and can say that as a business we are fully behind the idea of the Late Night Levy. But it is just the idea.

At The Rockstone, we pride ourselves on our standards, our expertise, and our approach to drinking. As such you will note that in three years we have only ever called the police out to an incident once, and that this call was cancelled shortly after as our door team resolved the situation.

We are also great advocates of responsible drinking. We do not encourage or tolerate binge drinking. We do not offer drinks deals or discounts. We serve excellent products at the appropriate prices, for people who enjoy drinking for the pleasure - not for getting drunk.

So it is with some confusion that I find the idea of the levy applying to all businesses slightly confusing. We do not hold a late license, although in the past we have used TENS. Yet we are expected to contribute the same as any other business in the vicinity, irrespective of their policy on serving alcohol. Surely some discretion should be used with regards to how a business operates? The worst offenders should be paying the biggest prices, surely?

As I say, we are behind the idea. But I think the execution needs to be looked at. I am sure the one rule for all approach saves some time on admin, but it is not a fair system and that I feel must be addressed.

Kind Regards

Jason Wiseman

Sainsbury's Supermarkets Ltd.

Response to Southampton Late Night Levy Consultation

Consultation Question 1 – COSTS

- (a) Do you agree that the costs of policing and other arrangements for the reduction or prevention of crime and disorder in connection with the late-night supply of alcohol are a fair assessment?
 - (b) Do you think that any of the costs ought not to be taken into account?
 - (c) Do you think that there are other costs that should be taken into account?
- (a) The police have calculated that it costs £1.6 million per annum to police the night time economy (NTE) area between midnight and 6am. The late night levy (LNL) would apply to premises outside as well as inside the NTE area which demonstrates the unfairness of the levy.

The police calculation gives no indication of the proportion of the costs result from premises selling alcohol in the NTE area. This must be highly relevant. There would be a police presence required even if there were no premises selling alcohol after midnight.

No indication is given by the police of the cost of policing the NTE area (or the wider Southampton area) at other times of the day.

- (b) The costs that relate to police activity that cannot be linked to the sale of alcohol between 12 midnight and 6am should not be taken into account.
- (c) Sainsbury's does not have sufficient information on the workings of the police to answer this question.

Consultation Question 2 – CRIME AND DISORDER

- (a) Do you agree with the assessment of crime and disorder in connection with the late-night supply of alcohol?
 - (b) Do you think anything has been left out?
 - (c) Do you think that anything mentioned should not be taken into account?
- (a) Paragraph 4.15 of the Consultation states that the statistics are those "linked to a licensed premise or have occurred on a public place...between the hours of 1900 and 0700." It appears that the police assessment is extremely broad brush. There are 1440 Violence against the Person incidents but no indication is given as to how many of these are linked to a licensed premise and how many simply occurred in a public space.

The fact that the police's statistics run from 1900 hours rather than 12 midnight renders the assessment useless for determining the extent of incidents after 12 midnight which is the purpose of the exercise.

The police also cite 1452 anti social behavior incidents. This time they do say that 44% occur before midnight and so this would suggest that the licensed premises selling alcohol after midnight are not necessarily the greater cause of anti social behavior. Again no attempt is made by the police to demonstrate a link between the incidents and licensed premises.

The Consultation should properly set out and compare crime and ASB incident statistics for blocks of time before midnight and then after midnight eg 12 midday to 6pm, 6pm to 9pm, 9pm to 12 midnight, midnight to 3am, 3am to 6am.

No data is given about ASB incidents that are reported before midnight.

The Consultation should also make clear which of these statistics can be linked to licensed premises.

(b) Please see our answer to (a) above

(c) Please see our answer to (a) above

Consultation Question 3 – BENEFITS OF A NTE

(a) Do you agree with the assessment of the benefits of the Night Time Economy in the City?

(b) Do you think there are any other benefits?

(c) Do you think that any benefits mentioned are not relevant?

(a) The Consultation states that there are over 200 licensed premises licensed to sell alcohol after midnight in the city. It does not state how many of these are within the NTE area. It does not say how many of these 200 premises actually sell alcohol after midnight. For example Sainsbury's has 2 stores with 24 hour licences but, to date, neither store has opted not to sell alcohol after midnight.

The Consultation fails to acknowledge that there are sections of society (doctors, nurses to name just two) that work through the night. There are businesses that respond to a demand for late night shopping. A person who wishes to shop during the night, as it suits their lifestyle, should be able to purchase alcohol to as part of his or her shop.

(b) Please see our answer to (a) above

(c) It is extremely difficult to compare on the one hand the financial cost to the police in reducing crime and disorder after midnight with the less tangible benefit of the benefits to having a NTE at all. To take this to its extreme, no doubt policing costs could be reduced by having no alcohol sales after midnight. However such a step would have calamitous consequences to the vibrancy, attraction and economy of the City both daytime and night time. So there should be greater recognition that

a LNE is a benefit to the City as a whole and not just to those premises licensed to sell alcohol.

Consultation Question 4 – INCOME FROM THE LNL

- (a) **Do you have any comments on the potential income that the levy may raise?**
- (a) Paragraph 4.27 of the Consultation is unclear. Is the Council estimating that the potential income will be reduced from £240,000 to £140,000 or to £100,000 depending on the actions of licence holders? What research has been undertaken to establish the percentage of the post midnight licences that are actually utilised? This cannot be a difficult or expensive exercise and must be essential to properly assess the likely income.

There will be a cost to the Council in processing free licence variations in the event that the LNL is adopted. Has this been factored into the costings?

Many operators will vary their licences so as not to be subject to the LNL and will then rely on temporary event notices. Has the cost of administering these notices been factored in to the costings?

Introducing a LNL will impact small business disproportionately and is likely to discourage enterprise and business diversity. This, in turn, will make Southampton a less attractive City both at night and during the daytime. Operators will take their business out of the City.

Whilst it is possible that the LNL will raise revenue it will do so by targeting the wrong businesses. It must be the case that premises licensed to sell alcohol to 12 midnight contribute to at least some of the crime and disorder and yet they will not be liable to pay a levy. The entire burden of this tax will fall on just a few. Whilst we appreciate that legislation does not allow a levy on those selling alcohol before midnight we would ask the Council to recognise that this is an unfair tax and therefore decide not to adopt it.

Sainsbury's believes that a partnership approach dealing with the root causes of disorder is likely to be more effective than a levy.

Consultation Question 5 – NEED TO RAISE REVENUE

- (a) **Do you agree that there is a need to raise the revenue that a levy may produce?**
- (b) **Are there any other issues that you would like the Council to consider?**

- (a) No. It is inherently unfair to raise revenue from businesses that are not contributing to the issues associated with the LNE. For example, premises that are licensed for 24 hours but do not utilise the licences save perhaps at seasonal times. Conversely, some businesses, (eg vertical drinking establishments) that are licensed to 12 midnight and clearly are contributing to the NTE issues will not be subject to the levy.
- (b)

Consultation Question 6 – DESIRABILITY OF THE LNL

- (a) Do you agree that it is desirable to raise the revenue through a levy to be used by the police and the Council?
- (b) Have you any comments on the considerations expressed in section 4?
- (c) Are there any other matters which you think that the Council should take into account in deciding whether it is desirable to introduce a levy?
- (a) No we do not agree that it is desirable. Section 4.27 of the Consultation is unclear. What is meant by “the Council’s best estimate is £100K”? If it means that the potential income of “up to £240K” is reduced to or by £100K this means that the Council is expecting a revenue of between £100K and £140K. This will then be subject to the costs of administering the scheme. As set out in our answers to question 5 above it cannot be desirable for a tax to be raised on those that do not contribute to the issues associated with the LNE and the Council should not adopt a measure that it knows to be unfair at the outset.

Paragraph 4.30 states that the Council faces the challenge to find “a further £54.7m of savings by 2016/17. We would hope that this challenge does not tempt the Council into adopting an unfair tax, simply because it can do so.

Paragraph 4.32 is misleading. It states that businesses operating in or benefiting from the NTE and their staff and customers stand to benefit from the LNL. In the case of Sainsbury’s stores and presumably there are other premises with late night licences that are not used, this is incorrect.

The more likely outcome of the LNL is a number of premises varying their licences so as to fall outside of the LNL and then relying on temporary event notices for late night events.

What research has been undertaken by the Council to support its assertion in paragraph 4.35 that the LNL is unlikely to have a detrimental effect on affected businesses or cause them to change their operation? Have you asked the question? Surely before taking any further steps the Council must ask those operators with licences that will be affected by the LNL “Will you seek to vary your licence hours if the LNL is adopted?” This is common sense. Such a survey would not be 100% accurate but at least the Council would have some evidence to support its case.

Importantly the LNL will apply across the City and will impact on premises that “are not considered to be crime and anti social behavior hotspots or areas that do not directly see the services provided to the NTE”. Surely this demonstrates the unfairness of the LNL.

- (b) Please see our response to (a) above.
- (c) We believe that we have covered this in our responses elsewhere in this document.

Consultation Question 7 – LATE NIGHT SUPPLY PERIOD

- (a) **Do you agree that the Late Night Supply Period should be a period that begins at one minute passed midnight and ends at 6am? What are your reasons for this?**
- (b) **If you think that the Late Night Supply Period should be for a different period, what should be the hours? What are your reasons for this?**
- (a) It is our view that the whole concept of the LNL is wrong. It is obvious that vertical drinking establishments that sell alcohol to 12 midnight must be contributing to any issues that arise between one minute passed midnight and 6am. Is there not a danger that on adopting the LNL, some operators will vary their terminal hour to 12 midnight which will result in many premises closing at the same time, something the Government has wished to avoid with staggered closing times.
- (b) Sainsbury's does not support the adoption of a LNL and so cannot propose an alternative time period.

Consultation Question 8 – EXEMPTIONS – OVERNIGHT ACCOMMODATION

- (a) **Do you agree that prescribed premises providing overnight accommodation should be exempt? Please explain your views.**
- (a) The Council proposes to exempt such premises as “It is not considered that these premises contribute significantly to the detrimental effects of the NTE between midnight and 6am”. This is laudable but as stated elsewhere in this response the LNL will be payable by many other businesses that do not contribute significantly (they may be outside the area of the NTE) or at all (they are closed during the night) and yet the Council is still proposing that they be subject to the LNL.

Consultation Question 9 – EXEMPTIONS – THEATRES

- (a) **Do you agree that prescribed theatres should be exempt? Please explain your views.**
- (a) Please see response to 8 above. But in addition it is worth making the point that there are probably no theatres licensed after 12 midnight and so they would not be subject to the levy in any event.

Consultation Question 10 – EXEMPTIONS – CINEMAS

- (a) Do you agree that prescribed cinemas should be exempt? Please explain your views.
- (a) Please see response to 8 above. But in addition it is worth making the point that there are probably no cinemas licensed after 12 midnight and so they would not be subject to the levy in any event.

Consultation Question 11 – EXEMPTIONS – BINGO HALLS

- (a) Do you agree that prescribed bingo halls should be exempt? Please explain your views.
- (a) Please see response to 8 above.

Consultation Question 12 – EXEMPTIONS – COMMUNITY AMATEUR SPORTS CLUBS

- (a) Do you agree that prescribed Community Amateur Sports Clubs should be exempt? Please explain your views.
- (a) Please see response to 8 above.

Consultation Question 13 – EXEMPTIONS – COMMUNITY PREMISES

- (a) Do you agree that prescribed Community Premises should be exempt? Please explain your views.
- (a) Please see response to 8 above.

Consultation Question 14 – EXEMPTIONS – COUNTRY VILLAGE PUBS

- (a) Do you agree that prescribed Country Village Pubs should NOT be exempt? Please explain your views.
- (a) Please see response to 8 above. We would be interested to know how many Country Village Pubs are licensed after 12 midnight.

Consultation Question 15 – EXEMPTIONS – BUSINESS IMPROVEMENT DISTRICTS

- (a) Do you agree that prescribed BID premises should NOT be exempt? Please explain your views.
- (a) There is no BID in Southampton. It is difficult to answer this question without knowing what the scope of any future BID would be. A concern is that it is possible that smaller businesses are less likely to be participants in a BID (we say this without any supporting evidence) and this would mean that small

business would be left paying the LNL and large businesses could be exempt. We consider this to be unfair on small businesses.

Consultation Question 16 – EXEMPTIONS – NEW YEAR’S EVE/DAY

- (a) **Do you agree that premises that only operate on New Year’s Day between midnight and 6am should be exempt? Please explain your views.**
- (a) If there is to be a LNL we agree this exemption. However, this could result in a deluge of minor variation applications. Has the cost of this been factored in?

Consultation Question 17 – REDUCTIONS – SMALL BUSINESS RATES RELIEF

- (a) **Do you agree that prescribed premises that receive Small Business Rate Relief should NOT be entitled to a reduction in the levy? Please explain your views.**
- (a) Has the Council established any evidence that premises that receive Small Business Rate Relief are less likely to contribute to NTE issues? Has the Council established how many premises would be exempt? If not we fail to see why this category of business should be exempt.

Consultation Question 18 – REDUCTIONS – BUSINESS-LED BEST PRACTICE SCHEMES

- (a) **Do you agree that at this time members of Business-Led Best Practice Schemes should NOT be entitled to a reduction? Please explain your views.**
- (b) **Do you agree that such a scheme should be developed? If so, what should be the details? How can it be developed? How will it be led?**
- (c) **If such a scheme were to be developed, do you agree that members should be entitled to a discount?**
- (a) A decision not to allow a reduction for members of such Schemes could hinder the future participation of and success of the Schemes in the future.
- (b) Sainsbury’s would welcome the opportunity to work with the Council and other shareholders in developing a scheme. We have considerable experience from participating in Community Alcohol Partnerships and consider that partnership working is the way forward and not the imposition of a LNL.
- (c) We would ask the Council to focus its efforts on the creation of a scheme and not adopt the LNL.

Consultation Question 19 – SPLIT LEVY BETWEEN POLICE & COUNCIL

- (a) **Do you agree that the net revenue from the levy should be split 70:30 between the Hampshire Police and Crime Commissioner and the Council? Please explain your views.**

(b) If you think that the Hampshire Police and Crime Commissioner should receive a larger (than 70%) proportion of the net revenue, please state what percentage you propose? [N.B. It is not possible to reduce the proportion to below 70%.] Please explain your views.

(a) Sainsbury's does not have a view on this.

(b) N/A

Consultation Question 20 – USE OF THE REVENUE

(a) Do you have any comments on the range of activities which the Council would wish to develop using its share of the levy revenue? Is there anything else that you would like to see? Please explain your views.

(b) Would you support developing a single programme delivered in partnership between the Council and the police? What would you like it to cover? Please explain your views.

(a) Sainsbury's does not have a view on this.

(b) Obviously a single programme must be the most efficient use of any monies raised by the LNL.

Consultation Question 21 – IMPLEMENTATION DATE & TIMETABLE

(a) Do you agree that the Council should seek to implement the LNL on 1st February 2015? Please explain your views.

(b) If you think that the LNL should be implemented on a different date, what date do you propose? Please explain your views.

(c) Have you any other comments on the proposed timetable? Please explain your views.

(a) No. As indicated by our responses there is no proper evidence that a LNL is necessary appropriate, proportionate or fair. The Consultation has not asked the logical questions and so the Council has no proper research to give a sensible estimate of how much money will actually be raised by the LNL once premises have varied their licences and resort to temporary event notices. If the Council is to consider adopting the LNL this research must be undertaken and shared. However, our strong preference is for the Council to focus on working in partnership with licensed operators.

(b) Sainsbury's does not support the adoption of the LNL.

(c) No.

From: Sam Baynham
To: Licensing Policy
Subject: Late night levy consultation
Date: 27 July 2014 14:43:20

To whom it may concern,

As a resident and avid supporter of nightlife within the local area of Southampton's city centre I'm strongly against your idea to implement a late night levy on any premises that provide alcohol between the hours of 01:00 - 06:00am.

I can understand why you would like to implement this levy, to raise funds to continue providing key facilities like the taxi marshals and late night policing. However I struggle to comprehend what is wrong with the existing structure? Yes, it will provide extra services, but in my opinion, I don't believe you need any extra services. What's on offer at the moment has not only been proven to work but is utilised by many people that enjoy Southampton's night life.

As I'm sure you're well aware the city has a vibrant nightlife which brings a lot to the community and the local economy. Introducing this levy would not only affect the local businesses but also the residents and visitors that enjoy the nightlife. At the end of the day, it will be those going out between the said hours that will be ultimately effected by higher entry or drinks prices. I believe this will put people off of going out as much.

With two universities in the city centre, students are a huge source of income for a lot of establishments and with this levy introduced they would be greatly affected. You may also find venues closing their doors earlier to avoid the extra fees. This will greatly affect promoters that organise specific nights or events in the city, which ultimately bring in tourism and boost the nightlife economy. I also believe it's extremely wrong of you to suggest there would be no exemption on smaller business' that already struggle with local restrictions put in place by the council.

All I'm asking is that you dismiss the idea of implementing a local late night levy, as I believe it will do more harm than good in an area that it's already tough in. We have structures in place that we know already work but I don't believe they need any extra funding. For a start, if the levy were to be introduced, how would I know as a resident living on Wilton Avenue, that the extra funds were being put to good use? There is no means of accurately measuring the effect extra funding would have.

Please take in to consideration the above, as I thoroughly believe it would be a travesty to implement this levy and may have a detrimental affect on the local economy, thus impacting nightlife in a way that may not recover.

Yours sincerely

S. F. R. A.
Southampton Federation of Residents' Associations
(Founded 1972)



29, Alma Road

Portswood

Southampton

SO14 6UN

20TH July 2014

To whom it may concern.

NIGHT TIME LEVY

On behalf of the Residents it represents, the Federation welcomes the proposed Night Time Levy.

It is hoped it can be administered in the way it is done in Newcastle, with right blend of stick and carrot.

The use of funds raised for taxi marshalls, street pastors and police is probably essential but for poor residents whose sleep is disturbed by taxi loads of drunks, whose noise and anti-social behaviour will still persist, it is not much comfort.

Some of the funds must be deployed to strengthen the Environment Health Team, whose numbers and availability seem to be ever decreasing.

Residents with school aged children, shift workers and ordinary people with jobs to go to next morning will be very disappointed that their lot does not seem to matter.

The only positive note will be the implementation of the Anti-Social Behaviour & Policing Act 2014 which comes into force on 7th October and beefs-up the legislation.

Hoping due consideration is given to residents living on the fringes of the night time economy

Peter Wirgman, chairman S.F.R.A.

From: [Doherty P.](#)
To: [Licensing Policy](#)
Cc: [Addison T.](#)
Subject: Late Night Levy Consultation
Date: 31 July 2014 15:34:57

Dear Sir/Madam,

As the Students Union we run late night bar's that could well be affected by the introduction of a late night levy. Whilst we note that a number of types of premises would be exempt from paying the levy it does not appear at first glance to include ourselves. Given that we as an organisation take steps above and beyond any licencing requirements – such as using our own security team as street marshals, running our own fleet of safety buses to return customers home as well as working closely with our societies, street pastors and other organisations – our main concern would be that we would no longer be able to financially support these welfare provisions should we be required to pay the levy. As such the levy would potentially have the effect of reducing the work we ourselves pay for for our members.

This is intended as our contribution towards the consultation from a licenced premises point of view – we would still wish as an organisation to be involved in any discussions as to provisions for late night services that could have an impact on the welfare of our student members and would also ask that we are informed where possible of the way these changes could be relevant to our members.

Kind Regards,

Pip Doherty

Deputy Head of Commercial Development



Registered Office:
University of Southampton Students' Union, Building 42, University Road, Southampton,
Hampshire, SO17 1BJ
T: 023 8059 4789 (internal: 24789) E: pip@susu.org W: www.susu.org

Please think before you print this email.

Any views expressed by the sender of this message are not necessarily those of the University of Southampton Students' Union (SUSU).

From: [Ian Powell](#)
To: [Licensing Policy](#)
Subject: Late Night Levy Consultation
Date: 31 July 2014 08:32:31

Dear Sir or Madam

I write on behalf of Spirit Pub Company PLC.

We are members of the ALMR and, having read your consultation document, have contributed to the ALMR submission in relation to the late night levy consultation.

Accordingly we adopt and endorse the ALMR submission as our own response to the consultation and would ask that it is considered appropriately.

Kind Regards, Ian Powell
General Counsel and Company Secretary

Spirit Disclaimer

Confidentiality

This email message is confidential and may contain privileged information. If you have received this email in error, please contact the sender immediately by return email and then delete it from your system; you should not read, copy, use or disclose its contents to anyone.

Warning

The Spirit group of companies ("Spirit Group") cannot accept responsibility for any loss or damage arising from the use of this email or attachments however caused. The recipient should check this email and any attachments for the presence of viruses or other malicious software.

Authority

It is the responsibility of those in receipt of any email sent by or on behalf of the Spirit Group which may give rise to a binding obligation to ensure that the person sending the email has the authority to enter into such obligation on behalf of any member of the Spirit Group

Notice

Opinions, conclusions and other information in this message that do not relate to the official business of the Spirit Group are neither given nor endorsed by the Spirit Group. The contents of e-mails sent and received are monitored

Spirit Group

The company sending this email is a member of the Spirit Group, the ultimate parent of which is Spirit Pub Company plc. (7662835). Spirit Pub Company plc., along with the group's principal subsidiaries listed below, is registered in England and Wales and has its registered office at Sunrise House, Ninth Avenue, Burton upon Trent, Staffordshire DE14 3JZ.

Spirit Pub Company (Services) Limited (5266811), Spirit Pub Company (Managed) Limited (5269240), Spirit Pub Company (Leased) Limited (5699544), and Spirit Pub Company (Trent) Limited (5746068).

From: Stewart Morris
To: Licensing Policy
Subject: Night Time Levy Consultation
Date: 12 June 2014 15:00:41

Please complete and return this questionnaire by 31st July 2014

BY E-MAIL to: licensing.policy@southampton.gov.uk

Consultation Question 1 – COSTS

(a) Do you agree that the costs of policing and other arrangements for the reduction or prevention of crime and disorder in connection with the late-night supply of alcohol are a fair assessment?

YES

(b) Do you think that any of the costs ought not to be taken into account?

NO

(c) Do you think that there are other costs that should be taken into account?

(a) NO

(b) NO

(c) NO

Consultation Question 2 – CRIME AND DISORDER

(a) Do you agree with the assessment of crime and disorder in connection with the late-night supply of alcohol?

YES

(b) Do you think anything has been left out?

NO

(c) Do you think that anything mentioned should not be taken into account?

(a) NO

(b) NO

(c) NO

Consultation Question 3 – BENEFITS OF A NTE

(a) Do you agree with the assessment of the benefits of the Night Time Economy in the City?

NO, there are very few benefits

(b) Do you think there are any other benefits?

NONE

(c) Do you think that any benefits mentioned are not relevant?

(a) NO

They are promoted to try to make it look as if there is less suffering from NTE ASB than endured by long term citizens than is actually happening.

(b) No comment

(c) No comment

Consultation Question 4 – INCOME FROM THE LNL

(a) Do you have any comments on the potential income that the levy may raise?

(a) YES, seems to be not much left for police and Council after expenses

Consultation Question 5 – NEED TO RAISE REVENUE

(a) Do you agree that there is a need to raise the revenue that a levy may produce?
YES

(b) Are there any other issues that you would like the Council to consider?

(a) No Comment

(b) No comment

Consultation Question 6 – DESIRABILITY OF THE LNL

(a) Do you agree that it is desirable to raise the revenue through a levy to be used by the police and the Council?

YES

(b) Have you any comments on the considerations expressed in section 4?

(c) Are there any other matters which you think that the Council should take into account in deciding whether it is desirable to introduce a levy?

(a) YES

(b) NO

(c) Consider that so many citizens have been driven out of the city by 25 years of NTE ASB that there will be very few left willing to answer these complicated questions.

Consultation Question 7 – LATE NIGHT SUPPLY PERIOD

(a) Do you agree that the Late Night Supply Period should be a period that begins at one minute passed midnight and ends at 6am? What are your reasons for this?

YES, that is when most ASB occurs, as recorded by both police and Polygon residents

(b) If you think that the Late Night Supply Period should be for a different period, what should be the hours? What are your reasons for this?

(a) No comment

(b) No comment

Consultation Question 8 – EXEMPTIONS – OVERNIGHT ACCOMMODATION

(a) Do you agree that prescribed premises providing overnight accommodation should be exempt? Please explain your views.

(a) YES, as some could be small hotels that cause no trouble with their drinkers.

Consultation Question 9 – EXEMPTIONS – THEATRES

(a) Do you agree that prescribed theatres should be exempt? Please explain your views.

(a) YES, theatregoers are not likely to be drunken hooligans.

Consultation Question 10 – EXEMPTIONS – CINEMAS

(a) Do you agree that prescribed cinemas should be exempt? Please explain your views.

(a) YES, Cinemagoers are not likely to be involved in ASB .

Consultation Question 11 – EXEMPTIONS – BINGO HALLS

(a) Do you agree that prescribed bingo halls should be exempt? Please explain your views.

YES, Bingo fans are not known to be involved in ASB

(a)

Consultation Question 12 – EXEMPTIONS – COMMUNITY AMATEUR SPORTS CLUBS

(a) Do you agree that prescribed Community Amateur Sports Clubs should be exempt?

Please explain your views.

(a) YES, not many late night boozing sessions connected to sports events

Consultation Question 13 – EXEMPTIONS – COMMUNITY PREMISES

(a) Do you agree that prescribed Community Premises should be exempt?

Please explain your views.

(a) YES, most community events do not emit many drunken persons

Consultation Question 14 – EXEMPTIONS – COUNTRY VILLAGE PUBS

(a) Do you agree that prescribed Country Village Pubs should NOT be exempt? Please explain your views.

(a) NOT SURE It depends on the size and capacity of the pub, more discussion is needed to define those affected

Consultation Question 15 – EXEMPTIONS – BUSINESS IMPROVEMENT DISTRICTS

(a) Do you agree that prescribed BID premises should NOT be exempt? Please explain your views.

(a) No comment

Consultation Question 16 – EXEMPTIONS – NEW YEAR'S EVE/DAY

(a) Do you agree that premises that only operate on New Year's Day between midnight and 6am should be exempt? Please explain your views.

(a) YES, we have to put up with these extra hours already so it will not be much worse in the future.

Consultation Question 17 – REDUCTIONS – SMALL BUSINESS RATES RELIEF

(a) Do you agree that prescribed premises that receive Small Business Rate Relief should NOT be entitled to a reduction in the levy? Please explain your views.

(a) No comment

Consultation Question 18 – REDUCTIONS – BUSINESS-LED BEST PRACTICE SCHEMES

(a) Do you agree that at this time members of Business-Led Best Practice Schemes should NOT be entitled to a reduction? Please explain your views.

(b) Do you agree that such a scheme should be developed? If so, what should be the details? How can it be developed? How will it be led?

(c) If such a scheme were to be developed, do you agree that members should be entitled to a discount?

(a) No comment

(b) No comment

(c) No comment

Consultation Question 19 – SPLIT LEVY BETWEEN POLICE & COUNCIL

(a) Do you agree that the net revenue from the levy should be split 70:30 between the Hampshire Police and Crime Commissioner and the Council?

Please explain your views.

YES, that seems a fair ratio

(b) If you think that the Hampshire Police and Crime Commissioner should receive a

larger (than 70%) proportion of the net revenue, please state what percentage you propose? [N.B. It is not possible to reduce the proportion to below 70%.] Please explain your views.

(a) No comment

(b) No comment

Consultation Question 20 – USE OF THE REVENUE

(a) Do you have any comments on the range of activities which the Council would wish to develop using its share of the levy revenue? Is there anything else that you would like to see? Please explain your views.

No comment

(b) Would you support developing a single programme delivered in partnership between the Council and the police? What would you like it to cover? Please explain your views.

(a) No comment

(b) No comment

Consultation Question 21 – IMPLEMENTATION DATE & TIMETABLE

(a) Do you agree that the Council should seek to implement the LNL on 1st February 2015? Please explain your views.

YES ,as soon as possible to cut down on NTE crime and nuisance

(b) If you think that the LNL should be implemented on a different date, what date do you propose? Please explain your views.

(c) Have you any other comments on the proposed timetable? Please explain your views.

(a) NO

(b) No comment

(c) No comment

PLEASE INCLUDE YOUR PERSONAL DETAILS

MY DETAILS ARE:

MY FULL NAME: Stewart Colin Morris

MY ADDRESS: 42 Harborough Road Polygon Southampton SO15 2FY

MY TELEPHONE NUMBER: 023 80630988

MY EMAIL ADDRESS: crompton52@hotmail.com

A Licence Holder

A Resident A RESIDENT

A Representative of a Licence Holder

Likely to be subject*/Not likely to be subject to* the LNL

(*delete as appropriate)

A Licensing Solicitor/Professional

An Interested Person

Other

I AM:

(DELETE as appropriate) (Details of your interest)

HAVE YOU ANY OTHER COMMENTS THAT YOU WISH THE COUNCIL TO
CONSIDER? NO

CONFIDENTIALITY

The Council cannot guarantee that any information that you pass to us can be treated as confidential. The Council is subject to a number of regimes that affect disclosure, including the Local Government (Access to Information) Act 1985, the Data Protection Act 1998, the Freedom of Information Act 2000 and the Environmental Information Regulations 2004. In particular, your response is likely to be classed as a background paper to future committee reports and open to public inspection.

- © 2014 Microsoft

-