

COMMENTS RE PROPOSALS FOR FORM OF POLICY STATEMENT

Option 1: Prescribing the exact form of the Regulations, including the methods for preparing, reviewing, revising and publishing the licensing policy statements.

Whilst it would make the preparation of the policy statement much easier and take responsibility away from the licensing authority it would also deprive the licensing authority of the opportunity to effect the needs of the locality. We need to retain this opportunity to incorporate wider community strategies into the policy or it will be lost. It will be inevitable that supplemental explanatory documents will be required at a cost. It is preferable to be able to include all relative information in one document.

Option 2: Do not make the Regulations, thereby giving full discretion to licensing authorities as to the form, including the methods for preparing, reviewing, revising and publishing, the policy statements

I believe that this option would cause many problems. This is a new area for local authorities. They require a base and guidance to operate from. There would be no consistency between different authorities resulting in constant enquiries from gaming operators based in other parts of the country increasing the burden. I am sure it would result in numerous legal challenges.

Option 3: Imposing minimum statutory requirements on all licensing authorities (in England and Wales)

This is the preferable option. It provides basic guidance regarding the structure of the policy statement and will ensure a degree of consistency between authorities. It is appropriate that the onus should be on the gambling operators to familiarise themselves with each licensing authorities policy.