



Nigel Wakelin
Licensing Team
Sport and Leisure Directorate
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6th August 2008

Dear Nigel

Legislative Reform Orders to Proposal to : Introduce a Simplified Process for Minor Variations to Premises Licences and Club Premises Certificate.

In general we have few comments to make with respect to the consultation document, but there are two points we would like you to consider.

Firstly page 17 clause 8.55 – Licensing Conditions

“Finally, there may circumstances when the licence holder and a responsible authority such as the police or environmental health authority, mutually agree that a new condition should be added to the licence. For example, that a club adds the provision of late night refreshment to its licence to ensure a longer period of dispersal. Such a change would not normally impact adversely on the licensing objectives and could be expected to promote them by preventing crime and disorder or public nuisance. In these circumstances, the minor variation process may provide a less costly and onerous means of amending the licence than a review, with no risk to the licensing objectives.”

We are concerned that, if the spirit of this clause was abused, it might mean a 'back door' route to have conditions attached to the Premises Licence instead of the correct and just process of a review hearing. As such we would respectfully submit that the drafting should be reviewed to ensure that this concern is addressed and the spirit of the clause is upheld.

Secondly page 19 clause 4.2 – Minor Variation Proposed Application Fee

The proposed fee of £73.00 is, in our view, too high. We would submit that a reasonable payment would be in the region of £40-£50

Thank you once again for asking for our feedback. I hope that our comments will be received in the constructive spirit in which I have written them.

Kind regards



[Redacted]
Licensing

Bargain Booze Ltd.

