East Herts Council Report Template

Licensing Sub-Committee

Date of Meeting: 27th July 2023

Report by: Jonathan Geall, Head of Housing and Health

Report title: Application for a new time limited premises licence for

AMA Fest, Silver Leys Polo Club, Millfield Lane, Bury Green, Little

Hadham, Hertfordshire (23/0781/PL)

Ward(s) affected: Little Hadham and The Pelhams

Summary

An application for a new time limited premises licence has been received from Harrier 12 Ltd. Representations against the application have been made by Hertfordshire Constabulary, Environmental Health and seven interested parties. Where representations are received against an application, and not withdrawn, there must be a Licensing Sub-Committee meeting to determine that application. This report is to inform that decision.

RECOMMENDATIONS FOR LICENSING SUB-COMMITTEE

(a) The application for a new premises licence be decided.

1.0 Proposal(s)

1.1 Members of the Licensing Sub-Committee should determine the application for a premises licence to Harrier 12 Ltd through consideration of the information contained in this report and appendices combined with submissions made at the Licensing Sub-Committee hearing.

2.0 Background

- 2.1 Under the Licensing Act 2003 and the council's Statement of Licensing Policy (herein 'the Policy') an application for a new or variation to a licence or certificate is granted by officers under delegated authority if no valid representations are received.
- 2.2 Where valid representations are received the council's discretion is engaged. A Licensing Sub-Committee has the delegated authority to determine applications for new and varied licences and certificates. This decision must be made whilst having regard to the Licensing Objectives, the council's own Statement of Licensing Policy and to statutory guidance issued by the Secretary of State under section 182 of the Licensing Act.
- 2.3 The Licensing Objectives are:
 - Prevention of Crime and Disorder
 - Public Safety
 - Prevention of Public Nuisance; and
 - Protection of Children from Harm.

3.0 Reason(s)

- 3.1 The application by Harrier 12 Ltd was submitted on 5th June 2023 and became valid on 6th June 2023 when the full fee was paid.
- 3.2 The application requested that the licence starts on 2nd September 2023 and ends on 3rd September 2023. The licensable activities requested are live music, recorded music, provision of performances of dance, anything of a similar description to live music, recorded music or performances of dance and the supply of alcohol for consumption ON the premises during the following times.

Licensable Activity	Day	Hours applied for
Live music, Recorded music and Performances of dance (indoors and outdoors)	Saturday 02/09 Sunday 03/09	11:00 – 23:00 11:00 – 22:00
Provision of anything of a similar description to live music, recorded music or performance of dance (indoors and outdoors)	Saturday 02/09 Sunday 03/09	11:00 - 23:00 11:00 - 22:00
Supply of alcohol (for consumption ON the premises)	Saturday 02/09 Sunday 03/09	11:00 - 23:00 11:00 - 22:00
Premises open to the public	Saturday 02/09 Sunday 03/09	10:00 - 24:00 10:00 - 22:00

- 3.3 A redacted copy of the application form for a new premises licence is attached as **Appendix 'A'**.
- 3.4 On 12th July 2023, the applicant confirmed that the event would be only run on a single day, 2nd September 2023. As such only the timings in bold in the preceding table are relevant. The applicant additionally amended the requested capacity of the event down to 8,500 guests and 499 employees. The original capacity requested on the application was 9,999 guests and 499 employees.

- 3.5 Section 18 of the application form asks the applicant to describe any additional steps they intend to take to promote the four Licensing Objectives. In this section the applicant has detailed 69 points which can potentially be converted into conditions and attached to any granted premises licence.
- 3.6 During the 28-day statutory public consultation period nine representations were received against the application; two from responsible authorities (Hertfordshire Constabulary and Environmental Health) and seven from interested parties (one from Little Hadham Parish Council, one from a Local Ward Councillor and five from local residents). Hertfordshire Constabulary's representation is **Appendix 'B'**, Environmental Health representation is **Appendix 'C'** and the representations from interested parties are **Appendix 'D'**.
- 3.7 Between them, the representations suggest that the following Licensing Objectives would be undermined if the application is granted as requested; Public Safety, Prevention of Public Nuisance and Prevention of Crime and Disorder.
- 3.8 The Police have made representations in relation to Public Safety and Prevention of Public Nuisance on the following grounds:

The location is not suitable for a single day event for 8,500 attendees plus staff. This number of attendees creates issues around Public Safety and Public Nuisance. Hertfordshire Constabulary's submission is that this application for a premises license should only be granted if the numbers attending are reduced and conditioned to a maximum of 3000 plus 499 staff / performers.

3.9 The Police' initial representation sent to the Licensing Authority and the applicant was 62 pages and included 31 blank pages. The Police confirmed that this was an error and sent the correct version to both parties on 10th July 2023. The Police have highlighted an error in the representation at paragraph 3 on page 6. The reference to the '2nd July 2023' should read the '2nd September 2023'.

- 3.10 Environmental Health's representations also relate to the Licensing Objectives of Public Safety and Prevention of Public Nuisance. They believe that their 20 suggested conditions are necessary to ensure Public Safety and to prevent Public Nuisance should the application be granted.
- 3.11 A plan of the area in which the premises are located is attached at **Appendix 'E'**. This can be used to illustrate the location of the premises in relation to residents and other businesses.
- **Note:** Several other location plans, diagrams, and photographs, which members may find useful are included within the Police representations.

Policy and Guidance

- 3.12 Section 5 of the East Herts <u>'Statement of Licensing Policy'</u> (herein 'the Policy') relates to Pre-application advice and engagement. Paragraph 5.7 and 5.8 state:
 - 5.7 Engagement is an important element of the licensing process. Applicants are expected to have considered the location and community it is proposing to operate in. An understanding of the concerns to be addressed can be obtained by early engagement with a variety of bodies and individuals including:
 - Responsible authorities
 - Ward Councilor's
 - Town councils

- Parish councils
- Residents Associations
- Businesses and residents in the vicinity of the proposed premises.
- 5.8 Experience shows that early engagement allows concerns to be addressed in the most timely and cost effective way for all parties. Where concerns cannot be addressed before an application is made resulting in representations the expectation is that the dialogue between the parties continues to try and find common ground.
- 3.13 Section 6 of the Policy details definitions of premises and location and operation of premises, differentiating between Town Centre locations and other areas. Under this section of the Policy the operation of AMA Fest would be classed as a *'Festival*'.
- 3.14 The proposed premises are not within a Town Centre as defined in section 7.0 of the Policy so are designated as '*Other area*'.
- 3.15 The table at 6.9 of the Policy details the council's approach to hours for licensed premises when it has received relevant representations to an application. In relation to Festivals, it states:

Will generally be allowed licensable activity until 01:00 on Friday and Saturday. On Sunday to Thursday 23:00, unless the following day is a Bank Holiday or recognised National Holiday.

3.16 Paragraph 6.11 of the Policy states:

Where we have to consider an application that involves alcohol sold for consumption on the premises, our policy will be to generally grant the licence with 30 minutes between the end of any sales of alcohol and the closing time of the premises (which we refer to as the "terminal hour").

- 3.17 Section 8 of the Policy deals with the Licensing Objectives:
 - 8.1 The Licensing Authority must carry out its functions with a view to promoting the four Licensing Objectives, each of which has equal importance:
 - the Prevention of Crime and Disorder,
 - Public Safety,
 - the Prevention of Public Nuisance, and
 - the Protection of Children from Harm.
 - 8.2 It is recognised that the licensing function is only one means of securing the delivery of the above Objectives and should not therefore be seen as a means for solving all local problems. The Licensing Authority will therefore continue to work in partnership with all stakeholders and partners towards the promotion of the Licensing Objectives.
- 3.18 Paragraphs 8.6 to 8.30 of the Policy contain information on how the council considers applications in respect of each of the Licensing Objectives identified within the representations against this application.
- 3.19 Section 15, paragraphs 15.1 and 15.2 deal with the '*Operating Schedule*'. These paragraphs reflect the information in the Section 182 Guidance issued by the Secretary of state.
- 3.20 Paragraphs 20.1 to 20.8 of the Policy apply to festivals and outdoor events. Of relevance are:
 - 20.1 The Licensing Authority recognises the contribution that wellrun outdoor events bring to local communities, and is pleased to support events which are run in a manner that will promote the Licensing Objectives.

- 20.5 The Authority will expect the organisers of any large events (taking place under the authority of a premises licence) or events which include special risk factors to consult the East Herts Safety Advisory Group (SAG) while planning their event, and to implement any reasonable recommendations made by the group. The SAG is a multi-agency body, which includes representatives of the Licensing Authority, responsible authorities and other statutory bodies who have involvement in the organisation and safe running of events.
- 20.7 One of the major concerns arising from outdoor events is disturbance to local residents from noise associated with music entertainment at the event, or other noisy equipment such as generators, public announcement systems, fireworks, and so on. The Licensing Authority will expect to receive a comprehensive operating schedule from applicants, containing appropriate proposals to control such issues and promote the Prevention of Public Nuisance Licensing Objective. Depending on the size and nature of the event it is likely this will need to include a comprehensive Event Management Plan (EMP) integrating a specific Noise Management Plan.
- 20.8 To mitigate these concerns as far as possible early engagement with those likely to be affected by an event is expected. Simply fulfilling the statutory obligation to advertise is likely to trigger representations and raise concerns more than if there has been early engagement. Please refer to the section of this Policy that deals with "Pre-application advice and engagement" for further details.
- 3.21 The Home Office-issued <u>'Guidance issued under section 182 of</u> <u>the Licensing Act 2003'</u> (herein 'the Guidance') states at paragraphs 9.37 and 9.38 that:

- 9.37 As a matter of practice, licensing authorities should seek to focus the hearing on the steps considered appropriate to promote the particular Licensing Objective or Objectives that have given rise to the specific representation and avoid straying into undisputed areas. A responsible authority or other person may choose to rely on their written representation. They may not add further representations to those disclosed to the applicant prior to the hearing, but they may expand on their existing representation and should be allowed sufficient time to do so, within reasonable and practicable limits.
- 9.38 In determining the application with a view to promoting the Licensing Objectives in the overall interests of the local community, the Licensing Sub-Committee must give appropriate weight to:
 - the steps that are appropriate to promote the Licensing Objectives;
 - the representations (including supporting information) presented by all the parties;
 - this Guidance;
 - *its own statement of licensing policy.*
- 3.22 Paragraphs 9.42-9.44 of the Guidance deal with how to determine actions that are appropriate for the promotion of the Licensing Objectives.
- 3.23 If members are minded to impose conditions to mitigate concerns regarding the undermining of the Licensing Objectives, then Chapter 10 of the Guidance deals with conditions attached to premises licences. Paragraphs 10.8-10.10, 10.13-10.15 would be particularly relevant along with the East Herts 'Pool of Model Conditions'¹.

¹ Conditions with a letter 'M' or marked 'All' are relevant to Festivals and Other outdoor events and some or all may be applied where appropriate having considered the merits of the individual application.

Officer observations

- 3.24 Looking at the activities requested the applicant has said that they want '*entertainment of a similar description* to live music, recorded music or performances of dance' but has not stated what this will be. It is likely that the entertainment this is trying to cover is not regulated entertainment or is covered by one of the other categories, members may wish to ask the applicant to clarify this point.
- 3.25 As highlighted earlier in the report the operating schedule within the application is a key source of information to help determine if the granting the application would undermine, rather than promote, the Licensing Objectives. In this case the applicant has offered 69 points which could be made into conditions on any granted premises licence.
- 3.26 The applicant has expressed that some of the conditions may no longer be relevant due to the time-limited nature of the licence and the amendments made. The Licensing Authority, on 12th July 2023, asked the applicant to review the conditions and suggest any changes with reasons; these to ideally be provided a minimum of three days before the hearing so that it could be circulated to all parties.
- 3.27 Whether or not the applicant's comments on the proposed conditions are subsequently supplied it does not fetter the Sub Committees ability to attach any conditions they deem appropriate for the promotion of the Licensing Objectives.
- 3.28 Suggested condition 8 refers to changes to the Event Safety Management Plan (ESMP) being approved by the Licensing Authority, officers would suggest however, this is not

appropriate. Whilst the Licensing Authority is an expert on licensing other areas such as crime or fire safety are better addressed by the responsible authorities who have expertise in the area. Therefore, reference to the 'Licensing Authority' should be replaced by 'responsible authorities' if the condition is to be included on any granted licence.

- 3.29 Condition 13 suggests that consultation will be held with local residents and businesses as well as stakeholders. The wording is not clear as to how many meetings will be held so members may wish to clarify this with the applicant, so the wording is unambiguous and enforceable.
- 3.30 Members may wish to ask the applicant if any such consultation has taken place prior to this application being made? The interested parties indicate that this has not been the case. As highlighted in paragraph 3.12 of this report, East Herts Statement of Licensing Policy recommends early engagement to help address concerns.
- 3.31 Condition 14 states: This Premises Licence is limited to authorise Licensable Activity for up to 40 event days each year. This is an example of a condition offered in the initial application that now has no relevance and should not be attached to any granted premises licence.
- 3.32 Reference is made to a variety of documents which will be prepared and approved prior to the event so members may wish to ask which of these have been finalised at the time of the Licensing Sub-Committee hearing?

- 3.33 Conditions 44 and 45 are duplicated so if members are minded to attach the conditions they should only be attached once to avoid unnecessary duplication.
- 3.34 Condition 68 and 69 deal with children being on site but does not make it clear whether they will or won't be allowed at this event. Members may wish to seek clarification on this point so that the wording of the conditions can be amended to reflect what it is intended to do.
- 3.35 The Police have provided anecdotal evidence of issues with AMA Fest at its previous location which reflects the concerns raised by the interested parties. The event manager of the previous location is quoted as saying that the event, with 6,000 attendees, 'received a number of complaints from residents and so feel the event is not suitable for a 'sleepy village' so decided not to host the event again'. This is not direct evidence from the event manager and does not directly relate to the current application so members should decide what weight to give this evidence having heard the applicant's response.
- 3.36 The Police highlight that they have not received a Traffic Management Plan and signage maps have only been verbally explained. In the applicants own offered conditions it says that there will be a Transport and Traffic Management Plan within the Event Safety Management Plan (ESMP) and that the ESMP first draft will be presented to Safety Advisory Group (SAG) no later than two months prior to the first event day. A draft ESMP has been presented to SAG but without a Traffic Management Plan so members may wish to ask the applicant to explain why this has not been presented and when a final Traffic Management Plan will be provided?

- 3.37 Environmental Health's representation asks members to attach20 conditions to any granted licence to mitigate their concernsthat Licensing Objectives will be undermined.
- 3.38 The first nine suggested conditions relate to noise from regulated entertainment. Condition 2 states that the locations for noise monitoring must be agreed with East Herts Environmental Health which reflects condition 47 offered by the applicant.
- 3.39 Condition 16 is not necessary as the licence, if granted, would only be for one event in 2023 to be held on 2nd September.The licence would then expire.
- 3.40 Conditions 17, 18 & 19 relate to the Event Management plan (Called the 'Event Safety Management Plan' by the applicant). Condition 17 requires this to be submitted three months prior to the event but this cannot be conditioned as its impossible for the applicant to comply. The second part of the condition requires the final version to be submitted 21 days prior to the event which differs from the 30 days offered by the applicant. Members should decide what time scale is appropriate, but officers would point out that the SAG meeting to discuss this event will be held 24 days prior to the event starting so allowing the final EMP/ESMP to be submitted 21 days before would allow for any changes requested by those attending the SAG meeting.
- 3.41 Condition 18 and 19 provide a list of what should be included in the EMP/ESMP but members need to be careful not to attach contradictory conditions regarding the content of this document. Ideally the applicant, Police and Environmental Health would agree what should be included and decide on

one definitive list. Members may wish to ask the relevant parties for their feedback regarding the content of such a condition if they are minded to attach it.

3.42 Condition 20 requires the licence holder (applicant until a licence is granted) to produce a policy for the inspection of the structures built on the site and present it to the relevant authorities not less than four weeks ahead of the event. Officers would suggest that members clarify with the Environmental Health representative who they consider the 'relevant authorities' would be so that an enforceable condition can be drafted. It would be helpful for the applicant if a definitive date to produce this policy was set. There is no mention within this condition of any type of approval being required for the final policy from any responsible authority, as such, the applicant could put in a very brief policy and it would meet the current wording of this condition.

Interested Party 1 – Little Hadham Parish Council

- 3.43 The grounds for this objection are given as: inadequate traffic measures, inadequate access and egress and lack of consultation with local residents.
- 3.44 The points regarding inadequate traffic management and the egress/ingress can be linked to the Public Safety and Prevention of Public Nuisance Objectives. However, the lack of consultation with local residents is not linked to any of the Licensing Objectives so should not be given any weight when making a decision. The Licensing Policy recognises that early engagement can be beneficial but there is no statutory obligation on the applicant to do this.

- 3.45 The representation mentions the traffic issues for a smaller event held in the vicinity of this event. This is an unrelated event so members should consider carefully what weight they attach to this information. The description of the roads and access to the site match the opinions given by the Police who also believe that they cannot accommodate such a big event, even at its amended capacity.
- 3.46 Whilst the reference to a lack of consultation is not relevant to the Licensing Objectives, the Parish Council have highlighted the ambiguous wording of the conditions and application. These are matters that can be addressed when the application is determined as any conditions attached need to be appropriate, unambiguous and enforceable.

Interested Party 2 – East Herts Ward Councillor

3.47 The representation raises concern regarding the capacity of the event, proximity to residents and the access to the site. The representation poses some questions and if the applicant answers them then it may assist members in reaching a decision.

Interested Party 3 - Local Resident

- 3.48 This representation again relates to the Public Safety and Prevention of Public Nuisance Objectives.
- 3.49 The suitability of the access to site, both for customers and emergency vehicles, is questioned. Reference is made to already being able to hear music from a marquee on the site and members may wish to ask further questions about this to

ascertain the potential level of nuisance from music at the festival if the licence were to be granted.

3.50 The interested party expresses that they are not against sensible progress and events but are concerned that they tried to engage in a discussion about the event but were ignored. It may assist members if the interested party explains who they tried to contact, when and how? If it was the applicant, then members may wish to ask why the attempt at starting a dialogue was ignored?

Interested Party 4 – Relative of Local Resident

3.51 This representation relates to Prevention of Public Nuisance and details concerns about music with alcohol outdoors, noise, traffic and the number of visitors expected.

Interested Party 5 – Local Resident

- 3.52 This representation references concerns about the potential undermining of the Licensing Objectives, specifically in relation to Crime and Disorder, Public Safety, and Public Nuisance.
- 3.53 With regards to Crime and Disorder reference is made to visitors perhaps not respecting the countryside but this is not a crime. Other matters such as trespass and disorderly conduct would fall under this Objective. The Police are the recognised authority on Crime and Disorder and have not made representation relating to this Objective. This should be considered when deciding what weight to attach to this part of the representation.

- 3.54 In relation to Public Safety the nature of the access to the site is raised as is a lack of street lighting. The combination of the availability of alcohol and the challenging driving conditions have been raised as possibly adding to the risks for both visitors and residents.
- 3.55 No further details regarding the potential for Public Nuisance are given.

Interested Party 6 – Local Resident

- 3.56 Reference is made to some already existing issues but these cannot be attributed to the applicant although they can be considered indicative of issues relating to the use of this site. The applicant my wish to address how they will attempt to control these issues during his event.
- 3.57 There is a comment that time limitations are already ignored during events at the site but again this cannot be linked to the applicant. These ongoing issues are linked to the operation of the club rather than this festival so it is for the applicant to convince all parties that he will operate in a wholly different way.

Interested Party 7 – Local Resident

- 3.58 This representation references noise disturbance already generated from the site by smaller events. It also highlights the access issues to the site.
- 3.59 The question is raised regarding what to do if issues arise during the event. The applicant has said that contact details will be available for any issues. It would then be a matter for how

responsive the applicant or those running the event could or would be. It is for the applicant to demonstrate to the best of their ability that they are a professional operator keen to minimise issues for residents.

- 3.60 Members may wish to ask any interested parties that attend the hearing what measures if any would mitigate their concerns. They were all informed of the amendments to the application on the 12th July 2023 and two responses were received prior to the report being drafted and are included in **Appendix D**.
- 3.61 If lowered capacity and one day event is not enough to mitigate the interested parties concerns then what would be? The applicant has told the Police that they have already sold 2,000 tickets and subsequently told the Licensing Authority that they had offered the Police to compromise on a capacity of 7,000. Would a reduction to 3000 visitors, as suggested by the Police, in combination with Environmental Health's conditions be enough? If not what else would they like to see to address their concerns? If there are no steps that could mitigate their concerns are the interested parties asking for the application to be refused?
- 3.62 Any reduction in the requested capacity would need to be supported by reasons to demonstrate why that lowered capacity would promote the Licensing Objectives when a higher capacity would not.
- 3.63 As stated in the Guidance, the council's decision should be evidence based, justified as being appropriate for the promotion of the Licensing Objectives and proportionate to what it is intended to achieve.

- 3.64 Members should consider if they believe the applicant has provided evidence that the licence, if granted, would promote, and not undermine the Licensing Objectives. This evidence should be balanced against the evidence given by those making representations that the Licensing Objectives would be undermined.
- 3.65 Whilst the hours and activities applied for are shorter than those detailed in East Herts 'Statement of Licensing Policy' this does not fetter the Sub-Committee's ability to decide that shorter hours or a refusal are more appropriate in the circumstances of an individual application. The Policy is a starting point from which decisions can be made; should the Policy be departed from then members should clearly give their reasons for doing this.
- 3.66 If the Sub-Committee believe that granting the application as requested would promote the Licensing Objectives, then the application should be granted as requested.
- 3.67 If the Sub-Committee believe that granting the application as requested would not promote the Licensing Objectives, then the starting point should be to consider if there are conditions that could be added to mitigate concerns.
- 3.68 In considering additional conditions, members should decide whether these steps would in fact address the concerns raised if the decision was made to grant the hours and activities as requested.
- 3.69 For conditions to be enforceable they need to be clear, unambiguous and free from subjective terms. If a condition

cannot be enforced, then it should not be placed on any granted licence.

- 3.70 Aside from adding conditions, it is open to members to limit the hours of operation and/or licensable activities further but clear reasons for this step would need to be given.
- 3.71 However, if adding conditions and/or limiting the hours beyond those requested and/or limiting licensable activities does not mitigate members' concerns regarding the promotion of the Licensing Objectives then the application should be refused.
- 3.72 Put in its simplest terms, what are the minimum measures that can be put in place to address concerns? Refusal of the application should be the last option considered.
- 3.73 When the Licensing Sub-Committee gives its decision to those in attendance it should be made clear to all parties how much weight has been attached to each submission and why and what evidence members have relied upon when reaching their decision.

4.0 Options

- 4.1 The actions open to the Licensing Sub-Committee are:
 - grant the application as requested if they feel the application would promote and not undermine the Licensing Objectives; or
 - grant the application but at the same time impose additional conditions or amend the activities or times requested; or
 - if members believe that there is evidence that shows that there are no steps that can be taken to ensure that the application sought would promote the Licensing Objectives then the application should be refused.

5.0 Risks

5.1 A decision on the application must be made and any decision made can be appealed at the Magistrate's Court. Therefore, the Licensing Sub-Committee should ensure that when giving their decision on the application they give clear reasons on how and why they have made their decision. In doing so, the council's ability to defend its decision is strengthened and the risk of its decision being over-turned on appeal is lessened, although, of course, this risk can never be entirely removed.

6.0 Implications/Consultations

- 6.1 As with any application for a new premise licence / variation of premise licence or review of a premise licence there is a 28-day public consultation.
- 6.2 The 28-day public consultation commenced on 7th June 2023 and ended on 4th July 2023.

Community Safety

6.3 The report details the four Licensing Objectives therefore Community Safety will be considered when determining the application.

Data Protection

6.4 Where the appendices have shown personal data, this has been redacted.

Equalities

6.5 Consideration has made to the Equality Act 2010 and the Public Sector Equality Duty in this report and will be considered during the Licensing Sub-Committee hearing.

Environmental Sustainability

6.6 No

Financial

6.7 There will be a cost to the authority in holding the Licensing Sub-Committee hearing; this will be covered by the existing budget.

There would be a cost if the decision of the Licensing Sub-Committee is appealed to the Magistrates Court and the authority chooses to defend that appeal.

Health and Safety

6.8 No

Human Resources

6.9 No

Human Rights

6.10 As with all applications and Council functions, the Human Rights Act 1998 has been considered in this report and will be considered during the Licensing Sub-Committee hearing.

Legal

6.11 All statutory requirements have been considered in preparing this report.

Specific Wards

- 6.12 Yes Little Hadham and The Pelhams.
- 7.0 Background papers, appendices, and other relevant material
- 7.1 Revised Guidance issued under section 182 of the Licensing Act 2003 (December 2022 -

https://assets.publishing.service.gov.uk/government/uploads/s ystem/uploads/attachment_data/file/1149896/Revised_guidanc e_issued_under_section_182_of_the_Licensing_Act_2003_Dece mber_2022__002_.pdf

- 7.2 East Herts Statement of Licensing Policy 2021-2026 https://cdn-eastherts.onwebcurl.com/s3fs-public/2022-03/Statement%20of%20Licensing%20Policy%202021-26%20Mar%2022.pdf
 East Herts Pool of Model Conditions 2021 https://eastherts.fra1.digitaloceanspaces.com/s3fs-public/2021-08/Pool%20of%20Model%20Conditions%202021%20%28access ible%29.pdf
- 7.3 Appendix 'A' Application for a New Premise Licence (redacted).
- 7.4 Appendix 'B' Hertfordshire Constabulary representation.
- 7.5 Appendix 'C' Environmental Health representation.
- 7.6 Appendix 'D' Interested parties' representations.
- 7.7 Appendix 'E' Plan showing location of the premises.

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