

Item No. 10.	Classification: Open	Date: 7 November 2018	Meeting Name: Licensing Committee
Report title:		London Borough of Southwark – Late Night Levy Consultation	
Ward(s) or groups affected:		All Wards	
From:		Strategic Director of Environment and Leisure	

RECOMMENDATION

1. That the Licensing Committee recommends that officers initiate a public and statutory consultation.

BACKGROUND INFORMATION

2. The Late Night Levy (LNL) is a power that enables Licensing Authorities to charge a levy on persons who operate premises that sell alcohol between 00:00 (midnight) and 06:00.
3. The Local Authority is required to use its portion of the levy on activities, which must be related to mitigating the impact of the supply of alcohol and associated activity, within the specified hours, namely:
 - the reduction or prevention of crime and disorder,
 - the promotion of public safety,
 - the reduction or prevention of public nuisance,
 - the cleaning of any relevant highway or relevant land in its area.
4. Before introducing a LNL the Authority must consider the desirability of introducing the scheme and must be able to demonstrate that the level of crime and disorder is or will rise from licensed premises selling alcohol during the LNL hours. The LNL must apply to the whole of the Borough. The Authority therefore needs to consider whether the introduction of a Borough-wide levy is a proportionate response.
5. Prior to making a decision to implement a LNL, the Council should have discussions with the Chief Officer of police to decide whether it is appropriate to introduce the levy in its area.
6. If the Authority considers it appropriate, it must then conduct a formal consultation with the police, existing licence holders and any other persons, including residents, about the introduction of any levy.
7. The consultation should also consider whether the authority needs to apply any exemptions or discounts to the LNL and how it will apportion net levy revenue between the police and the Authority. The decision whether or not to implement a levy is left entirely to the discretion of the Local Authority following a proper analysis of the consultation response.

8. The funds raised from any LNL are split between the Police and the Council. However, these two amounts can be combined and administered by a joint administrator under the crime partnership tasking team and thus spent within Southwark on policing, regulation and providing support services that operate within the LNL period.
9. Under the 2011 Act, LNL net revenue, after deducting the cost of collection and administration, must be divided with at least 70% going to the Police. However, following amended Home Office guidance issued March 2015; Licensing Authorities are recommended to use existing partnership arrangements with the Police to apply for 100% of the revenue raised to tackle alcohol-related crime and disorder in the administrative area in which the levy was raised. Southwark has already sought an agreement with the Police for 100% of the levy to come directly to the Council (a copy of the letter of support is available in Appendix 1). MOPAC has also been written to for agreement.
10. The Council currently funds a night time economy team (NTET) from its baseline budget. This consists of Police and Council Officers who work jointly to visit and inspect licensed premises and to deal with incidents and complaints arising from licensed premises operating within the night time economy. The current cost of this team is approximately £280,000 per annum.
11. A LNL could be used to fund the partnership work of the NTET (and its associated administration). Any surplus can be used to fund other initiatives that work towards providing a safer late night environment in Southwark. The spending of any surplus would be administered by a board made up of representatives from the Council, the Police and other relevant interested parties (e.g. residents associations and representatives from the night time economy industry).
12. Chapter 2 of Part 2 of the Police Reform and Social Responsibility Act 2011 (“the 2011 Act”) provides an adoptive power to charge a LNL to holders of premises licences (‘holders’) at premises that are licensed to supply alcohol within the night time supply period. The LNL is payable in addition to the annual maintenance fee for the premises licence. LNL revenue raised by Southwark must be used to reduce or prevent late night alcohol-related crime and disorder, and, having regard to the late night supply of alcohol, for services connected to the management of public safety, public nuisance and street cleaning.
13. The Policing and Crime Act 2017 schedule 18 adds a legal provision for;
 - The LNL to apply across the whole or any part of the Borough
 - Multiple LNL areas, each of which may have different late night supply periods.
 - A Police power to require Local Authorities to consider implementation of a LNL.

KEY ISSUES FOR CONSIDERATION

14. The Late Night Supply Period (LNSP) is set by the Licensing Authority and may include any consecutive hours between 00:00 (midnight) and 06:00. The LNSP must be the same every day of the week.

15. Holders of premises licences that license the supply of alcohol during the LNSP are liable to pay the LNL, whether or not the licence is actually used to supply alcohol during the LNSP.
- A LNL may apply to the whole of the Borough, or to any part of it.
 - All premises licensed for the supply of alcohol in the LNL area are included for both on and off sales.
 - The LNL includes boats and mobile bars where these are authorised under a premises licence.
 - Temporary Event Notice ('TENS') authorisations are not included.
 - The LNL amount is set nationally and depends on the non domestic rateable value ('NDRV') band of the licensed premises.
16. In total, 11 other local authorities have introduced arrangements for the implementation of the LNL. One council has since reversed that decision due to realignment of BID funding. Examples of other authorities are set out in Appendix 2.
17. The NDRV bands, and the LNL amount payable by holders in respect of licensed premises in these bands, are set out in Table 1 below.

Rateable Value Bands (based on the existing fee bands)						
A	B	C	D	E	D x 2	E x 3
No rateable value to £4,300	£4,301 to £33,000	£33,001 to £87,000	£87,001 to £125,000	£125,001 and above	Multiplier applies to premises in category D that primarily or exclusively sell alcohol	Multiplier applies to premises in category E that primarily or exclusively sell alcohol
Annual Levy Charges						
£299	£768	£1,259	£1,365	£1,493	£2,730	£4,440
Weekly equivalent						
£5.75	£14.76	£24.21	£26.25	£28.71	£52.50	£85.38

Table 1 – Potential LNL for each NDRV Band

18. Southwark has a diverse mixture of late night venues. See Table 2.

Premises Usage	Band A	Band B	Band C	Band D	Band E	Total
Night-clubs		7	3	0	1	11
Vessels / Boats / Ships	13	0	1	0	0	14
Restaurants / Cafes	4	73	31	9	8	125
Public House / Wine Bar	0	59	37	12	14	122

Supermarket / Grocer / Off Licence	8	51	10	1	3	73
Various other	15	34	15	4	26	94
Totals	25	190	82	22	26	439

Table 2 – No. of LNL premises in each NDRV Band

Maps

19. Appended are four maps in Appendix 3.

- **Map 1:** Maps of premises that would be affected by the LNL and those that would be unaffected. Existing Cumulative Impact Zones (CIZs) within the Borough are highlighted;
- **Map 2:** Map showing all 439 premises within the Borough that may be affected by the LNL. Again, the numbers of premises within existing CIZs are highlighted;
- **Map 3:** Map depicting the location of premises receiving Small Business Rate Relief which may potentially benefit from a 30% reduction in LNL fees;
- **Map 4:** Map showing Southwark BIDs and the premises that would be affected by the LNL.

Potential reductions in maximum revenue

20. The Act allows premises with late night authorisations to which the LNL would apply, to reduce their licensed hours by way of a free minor variation application, so that the LNL will not apply to their premises. The number of premises likely to do this is uncertain, but it is likely that a number of premises will take up this option, thus reducing the actual levy raised; therefore income is likely to be lower than the potential maximum illustrated above.

21. The numbers of premises in Southwark, open after midnight, in each NDRV Band are in Table 3 below.

Band	No. of LNL Premises in Southwark	Potential LNL Fees
A	40	£11,960
B	224	£172,032
C	97	£122,123
D	26	£35,490
E	52	£77,636
Total	439	£419,241

Table 3 – Potential LNL Fees

Variations to the Late Night Levy Charge

22. The Licensing Authority may decide to give reductions to eligible categories of premises, or to exempt them altogether.

23. In BID areas and/or in premises covered by a best practice scheme where there is an existing levy in place to promote the reduction or prevention of late night disorder, a legally set discount of 30% may be applied. Table 4 shows the numbers of premises in Southwark's BID areas. Application of this discount could reduce the potential revenue by £46,702.20.

BID Area	LNL Premises	Total LNL Fees minus 30%	Total LNL Fees
B Bankside	67	£55,210.40	£78,872.00
Blue BID	5	£2,359.70	£3,371.00
Southwark BID	5	£3,898.30	£5,569.00
Team London Bridge	51	£36,603.70	£52,291.00
Waterloo BID	14	£10,899.70	£15,571.00
Grand Total	142	£108,971.80	£155,674.00

Table 4 – Potential reduction in LNL in BID Areas

24. A legally-set discount of 30% may also be given to on-licensed premises who have a NDRV of £12,000 or less and who are in receipt of Small Business Rate Relief. Table 5 gives an indication of the potential loss of income should these premises be offered the discount. Application of this discount could reduce the potential revenue by £8,422.80.

Small Business Reduction (by NDRV Band)	LNL Premises	Total LNL Fees minus 30%	Total LNL Fees
A	4	£837.20	£1,196.00
B	35	£18,816.00	£26,880.00
Total	39	£19,653.20	£28,076.00

Table 5 – Potential reduction in LNL for small businesses

25. Cumulative discounts for holders in relation to premises that are eligible for more than one reduction category are not permitted, so there may be a slight reduction in the reduction in LNL if all the discounts were applied from that shown in Table 6 below.

Reduction in LNL due to 30% BID discount	£46,702.20
Reduction in LNL due to small business reduction discount	£8,422.80
Reduction in LNL if all discounts applied	£55,125.00
Potential maximum revenue	£419,241.00
Potential revenue if all discounts applied	£364,116.00

Table 6 – Impact of discretionary discounts on total LNL collected

26. Examples of premises affected by the LNL are available in Appendix 3.
27. The Best Practice Schemes must meet the benchmarks specified in the Late Night Levy (Expenses, Exemptions and Reductions) Regulations 2012 to qualify. Southwark does not currently operate any relevant best practice schemes because the Council believes there to be more value in the established partnership working within Business Improvement Districts (BIDs).

28. If a licence lapses (e.g. non payment of the annual fee, revocation or surrender) or an Early Morning Restriction Order ('EMRO') is made, this could prohibit a premises from serving alcohol, thus preventing the need to pay the LNL. If this was to occur adjustments to payments are made pro-rata.
29. Due to a conversion right carried over from former Justices' on-licences, a very large number of premises are authorised to sell alcohol between 00:00 (midnight) and 06:00 on New Year's Day only. This right is not recorded on many premises licenses. A proposal to include this category would require individual examination of each premises licence and to include this category would likely cause a large number of applications for a free minor variation to reduce licensed hours on New Years Eve. Therefore, officers recommend that this category of premises be excluded from the LNL in Southwark.
30. Exemption categories are specified in the Late Night Levy (Expenses, Exemptions and Reductions) Regulations 2012. These are set out in Table 7 below;

Premises with overnight accommodation that serve alcohol to their residents for consumption on the premises only
Theatres that serve alcohol to ticket holders, participants in the production and invited guests to a private function only
Cinemas that serve alcohol to ticket holders, and invited guests to a private function only
Bingo halls licensed under the Gambling Act where live bingo is the primary function
Registered community amateur sports clubs
Community premises that have successfully applied for the replacement of the mandatory 'designated premises supervisor' license condition
Businesses participating in a qualifying Business Improvement District where there an existing BID levy is to promote the reduction or prevention of late night disorder (there are none within Southwark)
Premises that supply alcohol in the LNSP on New Year's Day only.

Table 7 - LNL exemption categories

31. Adjustments to liability are made pro-rata, so if a licence lapses under Section 27 of the 2003 Act or an EMRO is made. As they could effectively prohibit a premises from serving alcohol at any time when the levy applies.

Options for spending the LNL

32. The office of the Deputy Mayor for Policing and Crime recently reported on arrangements with local authorities on joint spending of LNL revenues, setting out the basis on which these arrangements may be approved.
33. How this could work in practice can be seen from Islington's example, where they secured commitment for the LNL funds allotted to the Police to be committed within the Borough and to be pooled with the Council's share. Funding decisions are taken by the local authority, with resource drawn down by the Police as needed. A reference board has been formed with Police, local authority, members and trade representation. The board reviews the allocation of the LNL, as well as having responsibility of the small surplus proportion of the revenue for project funding in the next year.

34. Other local authorities have spent contributions from LNL receipts on;
- Additional policing
 - Street marshals
 - A 'departure lounge' is a temporary venue for people dispersing from a late night economy area, giving information and assistance
 - Town link radio systems
 - 'Uri-lifts' (pop-up urinals for use late at night only)
35. The Policing and Crime Act 2017 has also seen an amendment of s.135 Police Reform and Social Responsibility Act 2011 and receipts from a LNL that includes late night refreshment premises can also be spent on additional street cleaning, where there is evidence of additional littering near takeaway food premises open late at night.

Policy implications

36. The proposal to introduce the LNL supports the aim of Southwark's Licensing Policy, which is to uphold the licensing objectives by creating further opportunities to reduce crime and disorder, public nuisance and the public safety risks that are created by the supply of alcohol and late night refreshment in the late night economy. The main potential advantages & disadvantages of adopting the LNL are listed in Table 8.
37. The main potential risks and advantages of adopting the LNL are considered in the Table 7 below.

Positives	Negatives
Significant revenue could potentially be generated by the levy, and used to fund crime reduction initiatives	Venues may perceive this as another measure to prevent them contributing to economic growth within the Borough, and may discourage them from taking part in voluntary schemes to tackle issues caused by the night time economy that are not an approved best practice scheme
Some licensees may be encouraged to shorten their licensing hours to avoid the levy, which may lead to a reduction in night time economy related crime and disorder	Does not include other premises which potentially contribute to crime & disorder (premises with late-night refreshment only premises licences, cold food outlets, shisha bars). However, this may be reviewed in the future as this is currently outside of the legislation
Offering a levy reduction for businesses that join a best practice scheme could create a formalised partnership for crime and anti-social behaviour reduction. This would potentially reduce the amount of levy revenue needed to be spent on policing.	A significant amount of administration would be required to set up the LNL

A LNL could contribute to possible future budget commitments on crime reduction	There is a risk of a negative community response as the increased costs to licensees are likely to be passed on to customers and it may raise expectations for greater and more visible Police street presence, all from relatively modest revenues
Local community members may welcome this in reducing anti-social behaviour relating to the night time economy	Some venues may choose to shorten their licensing hours to avoid the levy. This may reduce the attractiveness of the area to patrons of the night time economy
	The Cheltenham experience found that income from the LNL was insufficient, compared to additional income from BIDs (see Appendix 1)

Comments from the House of Lords Select Committee

38. On the 4th April 2017 the House of Lords Select Committee published its report into the Licensing Act 2003 and criticized the LNL provisions in that it applied to all late night alcohol venues rather than being limited to those that caused the additional impact. The Council believes that all late night venues may contribute to late night issues to some degree or another. Further, the cost to each venue is proportionate to its size, which is in turn proportionate to the potential impact on the late night economy.
39. The Government's response to the House of Lords Committee recommendations was that it felt that the LNL provisions are an important tool for local authorities, enabling them to collect a financial contribution from business that profit from selling alcohol late at night. This financial contribution could be channelled into funding late night policing and other costs associated with the [evening and] night time economy. In March 2016 the Deputy Mayor for Policing and Crime agreed to delegate the responsibility for taking decisions relating to the late light levy to the MOPAC Chief Operating Officer, allowing licensing authorities to retain up to 100% of the levy where they can demonstrate that they have considered other options and are prepared to deliver a best practice model that align with MOPAC priorities.
40. The House of Commons has also produced a Briefing Paper regarding the introduction of LNLs. A copy is available for Members' information in Appendix 5.

Southwark Late Night Levy Data Analysis

41. Alcohol-related harm is recognised as a major health problem. Appendix 6 contains a detailed dataset in relation to the impact of alcohol within the London Borough of Southwark.
42. Public Health England has provided a local alcohol profile summary, which shows that:
 - Southwark hospital admission rates for alcohol-specific conditions is the fifth highest in London;

- The admission rate has been notably above the London average for the previous seven years;
- A number of London boroughs within similarly high hospital admission rates have introduced the Late Night Levy to support services that attempt to reduce alcohol related harm.

43. Further information is provided regarding alcohol-related violent crime and the locations within the Borough. It is clearly recognisable that 'hot spots' occur most frequently around areas that are acknowledged to have a high density of alcohol-licensed premises; to the point that Cumulative Impact Policies have been introduced in those areas.

Consultation

44. Statutory consultation will take place only after an 'in principle' decision has been taken to introduce a LNL. The details of the scheme will be designed following a full non-statutory consultation process. A copy of the consultation plan is available in Appendix 7, which includes the questions which will be consulted upon.

45. Statutory consultation on the proposed LNL will be required before it can be introduced, and must set out the following information:

- the date on which the LNL will first apply
- the time period for the LNL (e.g. 00:00 (midnight) to 06:00)
- any exemptions to the LNL
- any reductions to the LNL
- the percentage of the LNL to be paid to the Police (minimum 70%)

46. The statutory consultation must include MOPAC, the Borough Police and relevant affected licence holders. It must also be advertised on the Council website and in a local newspaper. Other than the need for it to be targeted and proportionate, the required process and timing of the consultation is not specified in the legislation.

47. The outcome of statutory consultation must be reported to Council, who may decide that the LNL is to apply in Southwark after considering:

- Policing and other costs for reducing or preventing alcohol-related crime and disorder and/or costs for reducing or preventing crime and disorder related to the supply of late night refreshment between 00:00 (midnight) and 06:00
- The desirability of raising revenue in accordance with regulations, of which not less than 70 per cent must be applied to the local policing body after relevant administrative expenses are deducted unless an alternative agreement has been made with MOPAC.

Non Statutory consultation

48. The impact of any decision to introduce a LNL is both substantial (affecting a large number of businesses) and widespread (across the whole Borough or a substantial part). In accordance with the Council's published principles on consultation the Council should consult on these proposals. The consultation must be at a time when proposals are at a formative stage. The statutory consultation described above does not fulfil these criteria; therefore additional,

non-statutory consultation is required.

49. Should the Council wish to take this forward; officers will consult widely for a 12 week period on the principle of introducing a LNL, and the 'design' options. Consultation packs containing an overview of the policy, the Act and a feedback questionnaire will be sent to relevant stakeholders. An on-line consultation will also form part of the process.

Consultees will include:-

- Personal Alcohol Licence holders,
 - Representatives of businesses and residents,
 - Amenity groups,
 - Community associations,
 - Ethnic group associations,
 - Faith groups,
 - Traders' associations,
 - People and parties who responded to previous consultations on the Policy Statement and the Cumulative Impact Policy Areas,
 - Neighbouring Licensing Authorities, and
 - Responsible Authorities.
50. Any 'in principle' decision to introduce a LNL has to be taken by the Licensing Committee; following that, the statutory and public consultation can commence.
51. Potential Timeline for decision points, public consultation and implementation
- The proposal is to go to the Licensing Committee on 7 November 2018.
 - Publish the Council's 'in principle' decision on line and in a newspaper the following week (November 2018). A copy of the DRAFT Notice of Proposal is available in Appendix 8.
 - Both the statutory and public consultations will commence after the Christmas period for 12 weeks from 07 January to 31 March 2019.
 - Results to go to the Licensing Committee 10 June 2019
 - Results to go to Council Assembly for final decision 10 July 2019.
 - The implementation of the LNL is intended for 01 September 2019, if accepted.

Community impact statement

52. The consultation will set out the Council's aims at introducing a LNL and how revenue gained will be spent. The expenditure of the income will have a positive impact on the wider community by reducing the potential for alcohol-related crime and anti-social behavior. The consultation will allow a wide variety of stakeholders, including residents and local businesses, to highlight how the LNL may affect them.
53. Furthermore, Southwark's Statement of Licensing Policy sets out to achieve a necessary balance between providing a platform upon which responsible business operators may contribute toward a thriving business and late night economy while ensuring that the quality of life of those who live and work in the Borough is protected and enhanced through the licensing system.
54. Central to this, is a licensing process which aims to be inclusive and ensures that local community concerns are understood, debated and resolved. This is

supported by offering broad support to licensees, through the range of involved authorities, to establish best practice management, and by a strong directed enforcement resource.

Equality Analysis in relation to the consultation

55. Alcohol-related crime and anti-social behavior has the potential to affect all groups of people. It is acknowledged that the cost of the Levy will primarily affect owners of businesses that provide alcohol during the late-night economy. The additional revenue raised however, has the potential to assist residents from all communities.
56. Southwark has a wide range of licensed premises, many which contribute to the late-night economy. As the Levy would be applied equally to all premises selling alcohol after midnight, there is no data to suggest that this would negatively impact any community group in particular. The consultation will establish whether the content of the Late Night Levy is inclusive, appropriate, accessible and beneficial.

Timetable for Proposed Implementation

57. The decision to consult on and/or introduce a levy would be made by Council Assembly. If approved, it is anticipated that the consultation timeline will be:
- Formal consultation on the levy – 07 January to 31 March 2019
 - 10 June 2019 Licensing Committee to consider consultation responses and recommend that Council Assembly that the LNL is adopted.
 - 10 July 2019 Council Assembly.
58. Should Council Assembly agree to introduce the LNL:
- Notifications sent to holders of relevant authorisations – in July, following the full Assembly meeting, if the go-ahead is given
 - Period of free variations – for a reasonable period prior to the implementation of the Levy
 - Start date of the LNL – 1 September 2019

Resource implications

59. There are no additional resource implications arising from this report at this stage. The Late Night Levy is designed to be self financing, with Council administration and collection expenses deducted from gross receipts before the remaining funds are allocated.

Financial implications

60. The Late Night Levy (LNL) is a power that enables Licensing Authorities to charge a levy on persons who operate premises that sell alcohol between 00:00 (midnight) and 06:00. The amount payable is determined by the rateable value of the premises and is set nationally.

61. The potential maximum income that might be generated based on the number of relevant premises in the different ratable value bands is £419,000. All income raised by the levy must be spent on activities which benefit the night time economy.

SUPPLEMENTARY ADVICE FROM OTHER OFFICERS

Director of Law and Democracy

62. The Police Reform and Social Responsibility Act 2011 (“the 2011 Act”) allows the Council to raise revenue on alcohol licensed premises by way of a Late Night Levy (the “LNL”). The powers to introduce the LNL comes specifically from within the 2011 Act and not by way of an amendment to the Licensing Act 2003.
63. In considering whether to introduce a LNL, the Council must first consider whether it is worth having the Levy having regard to the current cost of tackling the problems of crime and disorder that are caused by the night time economy from those premises that are licensed for alcohol sales between midnight and 6.00 am.
64. Any LNL imposed must apply to the whole Borough and will only apply to those who hold a licence for the hours that the LNL will operate from. Local Authorities do have a discretion as to the hours when the LNL can start and finish, although it must be within those hours specified above.
65. The 2011 Act does not prohibit the Local Authority and Police agreeing a separate agreement as to the use of the funds raised for the Police, which is detailed in paragraph 35 of this report.
66. Before the LNL can be introduced the Council must comply with procedural requirements namely:
- consult with the police and those licensees that will be affected by the proposed levy
 - placing a notice of the relevant details for the proposed levy on the website and in the local newspaper with a copy of the notice also being sent to police and affected licensees
67. The consultation must:
- be at a time when proposals are still at a formative stage;
 - have sufficient reasons for the proposal to enable intelligent consideration and response;
 - give adequate time for such consideration and response; and
 - the product of the consultation must be conscientiously taken into account in finalising any proposals.
68. Following the consultation should Council Assembly decide to adopting the LNL this must be approved by Full Council pursuant to Schedule 1 of The Local Authorities (Functions and Responsibilities) (England) Regulations 2000, as amended in 2013.

Strategic Director of Finance and Governance (EL18/015)

69. The strategic director of finance and governance notes the recommendation that the Licensing Committee recommend that officers initiate a public and statutory consultation on introducing a late night levy.
70. The strategic director also notes the potential revenue from the introduction of a late night levy as set out in paragraphs 20 – 25 and the options for spending the LNL revenues in partnership with the Office of the Deputy Mayor for Policing and Crime as detailed in paragraphs 32 – 35.
71. Officer time to effect recommendations will be contained within existing budgeted revenue resources.

Other officers

72. The report has been edited, amended and cleared by a number of people, including Councillor Hamvas (Chair of the Licensing Committee) and Councillor Mills, (Cabinet Member for Finance, Performance and Brexit).

BACKGROUND DOCUMENTS

Background Papers	Held At	Contact
Licensing Act 2003 Home Office revised guidance to the Act Secondary Regulations Southwark statement of licensing Policy Case file	Southwark Licensing, C/O Community Safety & Enforcement, 160 Tooley Street, London SE1 2QH	Kirty Read Tel: 020 7525 5748

APPENDICES

No.	Title
Appendix 1	Letter of Support from the Borough Commander
Appendix 2	Other Authorities with LNLs
Appendix 3	Maps of affected premises
Appendix 4	Examples of premises affected by the LNL
Appendix 5	House of Commons Briefing Paper
Appendix 6	LNL Data Analysis
Appendix 7	LNL Consultation Plan
Appendix 8	Draft Notice of Proposal

AUDIT TRAIL

Lead Officer	Deborah Collins, Strategic Director of Environment and Leisure	
Report Author	Andrew Heron – Principal Licensing Officer	
Version	Final	
Dated	25 October 2018	
Key Decision?	Yes	
CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / CABINET MEMBER		
Officer Title	Comments Sought	Comments Included
Director of Law and Democracy	Yes	Yes
Strategic Director of Finance and Governance	Yes	Yes
Cabinet Member	Yes	Yes
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