

WEST SOMERSET COUNCIL

Gambling Act 2005

**Statement
of
Gambling
Policy**

Revision v.3
Dated 3rd January 2010

West Somerset Council Statement of Gambling Policy

INDEX

		Page
1	Statement of Licensing Policy	
1.1	Licensing Objectives	1
1.2	Introduction	1
1.3	Glossary of Terms	2
1.4	Types of Licence	3
1.5	Licensable Premises & Permits	3
1.6	General Principles	3
1.7	Advisory Body for the Protection of Children from Harm	5
1.8	Consultees	5
1.9	Information Exchange	5
2	Legislation, Policies and Strategies	
2.1	Legislation	5
2.2	Relationship with Planning Policies	6
2.3	National Strategies	6
2.4	Local Strategies and Policies	6
2.5	Integrating Strategies	6
3	Decision Making	
3.1	Committee Terms of Reference	7
3.2	Allocation of Decision Making Responsibilities	8
3.3	Licensing Reviews	8
4	Local Standards	
4.1	Applications	9
4.2	Assessment of Need	9
4.3	Conditions	9
4.4	Enforcement	9
4.5	Casinos	10
4.6	Unlicensed Family Entertainment Centre Gaming Machine Permits	10
5	Prevention of Crime and Disorder Objective	10
6	Ensuring that Gambling is Conducted in a Fair and Open Way Objective	11
7	Protection of Children and Other Vulnerable Persons Objective	
7.1	Access to Licensed Premises	11
7.2	Vulnerable Persons	12

8	Complaints against Licensed Premises	12
9	Further Information	12
	Appendix A – Table of Delegations of Licensing Functions	13
	Appendix B – Map of District	14
	Appendix C – Contact Details for Relevant Authorities	15
	Appendix D - List of Consultees	16

1 STATEMENT OF LICENSING POLICY

1.1 Licensing Objectives

The Gambling Act 2005 (“the Act”) requires that the Council carries out its various licensing functions with a view to promoting the following three licensing objectives:-

- 1. Preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime;**
- 2. Ensuring that gambling is carried out in a fair and open way;**
- 3. Protecting children and other vulnerable persons from being harmed or exploited by gambling.**

1.2 Introduction

West Somerset Council is the Licensing Authority under the Gambling Act 2005 and is responsible for granting premises licences in West Somerset (“the District”) in respect of:-

- ❖ Casino Premises
- ❖ Bingo Premises;
- ❖ Betting Premises, including tracks
- ❖ Adult Gaming Centres
- ❖ Family Entertainment Centres; and
- ❖ Permits for Alcohol Licensed Premises

The area administered by West Somerset Council is predominately rural in character with agriculture and tourism being the most important commercial activities. The population of the district is approximately 35,400 with about one third living in Minehead, which is the principal town. Only the peripheral Towns of Watchet and Dulverton and villages of Dunster, Porlock and Williton significantly interrupt the surrounding countryside. A map of the district is contained in Appendix B.

The 2005 Act requires the Council to publish a “Statement of Licensing Policy” that sets out the policies that the Council will generally apply to promote the Licensing Objectives when making decisions on applications made under the Act.

This “Statement of Licensing Policy” has been prepared having regard to the provisions of the Gambling Act, Guidance issued by the Gambling Commission and responses received during the consultation process. It is intended to be a discussion document leading to adoption by West Somerset Council of a formal Statement of Licensing Policy, after having due regard to any responses from those consulted on this policy statement.

The formal Statement of Licensing Policy will be available on West Somerset Council’s website.

The policy will come into effect on the day of adoption by the Council and will be reviewed as necessary, and at least every three years from the date of adoption.

1.3 Glossary of Terms

Within this Statement of Policy, the following words and terms are defined as stated:

Licensing Objectives:	As defined in section 1.1
Council:	West Somerset Council
District:	The area of Somerset administered by West Somerset Council (Map appended at Appendix B)
Licences:	As defined in section 1.5 below
Applications:	Applications for licences and permits as defined in section 1.4 below
Notifications:	Means notification of temporary and occasional use notices
Act:	The Gambling Act 2005
Regulations:	Regulations made under the Gambling Act 2005
Premises:	Any place, including a vehicle, vessel or moveable structure
Code of Practice:	Means any relevant code of practice under section 24 of the Gambling Act 2005
Mandatory Condition:	Means a specified condition provided by regulations to be attached to a licence
Default Condition:	Means a specified condition provided by regulations to be attached to a licence, unless excluded by West Somerset Council
Responsible Authority:	For the purposes of this Act, the following are responsible authorities in relation to premises: <ol style="list-style-type: none">1. The Licensing Authority ("West Somerset Council");2. The Gambling Commission;3. Avon & Somerset Constabulary;4. Devon and Somerset Fire and Rescue Service;5. Planning Manager, Planning Dept, West Somerset Council;6. Planning Manger, Exmoor National Park Planning Authority;7. Environmental Protection Team, West Somerset Council;8. Safeguarding Children Board, Social Services, Somerset County Council;9. HM Customs and Excise.
Interested Party:	For the purposes of the Gambling Act 2005, a person is an interested party in relation to a premises licence if, in the opinion of the Licensing Authority which issues the licence or to which the application is made, the person:-

- a) Lives sufficiently close to the premises to be likely to be affected by the authorised activities;
- b) Has business interests that might be affected by the authorised activities; this could also include, for example, trade associations, charities, faith groups and medical practices.
- c) Represents persons who satisfy a) or b) above; for example, Residents' and Tenants' Associations.

When considering whether a person is an interested party, each case will be judged on its merits taking into consideration the relevant circumstances, including those contained in the Gambling Commission's Guidance to Local Authorities.

1.4 Types of Licence

This document sets out the policies that the Council will apply when making decisions upon applications or notifications made for:-

1. Premises Licences;
2. Temporary Use Notices;
3. Occasional Use Notices;
4. Permits as required under the Act;
5. Registrations as required under the Act.

1.5 Licensable Premises and Permits

This policy relates to all those licensable premises, notices, permits and registrations identified as falling within the provisions of the Act, namely:-

1. Casinos;
2. Bingo Premises;
3. Betting Premises;
4. Tracks;
5. Adult Gaming Centres;
6. Licensed Family Entertainment Centres;
7. Unlicensed Family Entertainment Centres;
8. Club Gaming Permits;
9. Prize Gaming and Prize Gaming Permits;
10. Temporary Use Notices;
11. Occasional Use Notices; and
12. Registration of small society lotteries.

1.6 General Principles

Nothing in this Statement of Policy will:-

1. Undermine the rights of any person to apply under the Act for a variety of permissions and have the application considered on its individual merits; OR
2. Override the right of any person to make representations on any application or seek a review of a licence or permit where they are permitted to do so under the Act.

The starting point in determining applications will be to grant the application without conditions. Conditions will only be considered where they are needed to meet the requirements of the licensing objectives, and any conditions applied will not be overly onerous and will be proportionate to the scale of the application and the risks involved. Conditions will generally be considered unnecessary if they are already adequately covered by other legislation.

All applicants for Premises Licences will be required to set out how they will promote the licensing objectives, as specified in section 1.1 above, and what measures they intend to employ to ensure compliance with them.

When determining an application to grant a Premises Licence or whether to review a Premises Licence, regard will be taken regarding the proximity of the premises to schools, vulnerable adult centres or residential areas where there may be a high concentration of families with children. The proximity of premises taken into consideration will vary depending on the size and scope of the gambling premises concerned. Each case will, however, be decided on its merits. Therefore, if an applicant can effectively demonstrate how they might overcome licensing objective concerns, this will be taken into account.

Licensing is about the control of licensed premises, Temporary Use Notices or Occasional Use Notices within the terms of the Act. Conditions may be attached to licences that will cover matters that are within the control of individual licensees.

When considering any conditions to be attached to licences, the Council will primarily focus on the direct impact of the activities taking place at licensed premises on members of the public living, working or engaged in normal activity in the area concerned. The Secretary of State may by regulation provide for specified conditions to be attached to a premises licence as either "mandatory" or "default" conditions. In determining an application the Council may not have regard to the expected demand for the facilities which it is proposed to provide.

The Council recognises that, apart from the licensing function, there are a number of other mechanisms available for addressing issues of unruly behaviour that can occur away from licensed premises, including:-

1. Planning controls;
2. Ongoing measures to create a safe and clean environment in these areas in partnership with local businesses, transport operators and other Council departments;
3. Regular liaison with the Police on law enforcement issues regarding disorder and anti-social behaviour;
4. The power of the Police, other responsible authorities or local residents and businesses to seek a review of the licence.

Objectors will be required to relate their objection to one or more of the Licensing Objectives, as specified in section 1.1 above, before the Council will be able to consider it.

Where a person, whether or not directly affected by an application or living in the vicinity of a licensable premises under consideration, puts themselves forward as representing the interests of residents in the vicinity, the Licensing Authority will normally ask them to provide evidence that they are acting as representatives of others.

The Council, in undertaking its licensing function, will have due regard to the need to eliminate unlawful discrimination and to promote equality and good relations between persons of different racial groups.

1.7 Advisory Body for the Protection of Children from Harm

West Somerset Council, as the licensing authority, designates the Safeguarding Children Board as the competent authority to provide advice on the protection of children from harm.

The Safeguarding Children Board is the Somerset County Council Child Protection Unit and operates throughout the county of Somerset, covering the district of West Somerset and has the specialist knowledge and expertise to fulfil this role.

1.8 Consultees

The Statement of Licensing Policy will be subject to formal consultation with:-

1. Avon and Somerset Constabulary;
2. Devon and Somerset Fire & Rescue Service;
3. The Local Safeguarding Children Board;
4. West Somerset Crime & Disorder Reduction Partnership;
5. Representatives of the holders of the various licences for premises within the District who will be affected by this Policy;
6. Persons/bodies representing the interests of persons likely to be affected by this policy; and
7. Parish and Town Councils.

For further information, see Appendix D.

1.9 Information exchange

In fulfilling its functions and obligations under the Gambling Act 2005 the Council will exchange relevant information with other regulatory bodies and will establish protocols in this respect. In exchanging such information, the Council will conform to the requirements of the Gambling Act, data protection and freedom of information legislation in accordance with the Council's existing policies.

Contact details of those persons making representations and the details of the representations will be made available to applicants to allow for negotiation and, in the event of a hearing being held, will form part of a public document. Anyone making representations or applying for the review of a premises licence will be informed that their details will be disclosed.

2 LEGISLATION, POLICIES AND STRATEGIES

2.1 Legislation

In undertaking its licensing function under the Gambling Act 2005, the Council is also bound by other legislation, including:-

1. Section 17 of the Crime and Disorder Act 1988;

2. Human Rights Act 1998;
3. Health and Safety at Work Act 1974;
4. Environmental Protection Act 1990;
5. The Anti-Social Behaviour Act 2003;
6. The Race Relations Act 1976 (as amended);

However, the policy is not intended to duplicate existing legislation and regulation regimes that already place obligations on employers and operators.

2.2 Relationship with Planning Policies

When determining an application, regard cannot, under the terms of the Act, be given to planning or building control permissions and/or any planning restrictions.

Unmet demand is not a criterion that will be taken into consideration when determining an application for a Premises Licence under the Gambling Act 2005.

The issue of a Provisional Grant of a Premises Licence is a separate and distinct process to the granting of Planning Permission. Planning and Building Control permissions will need to be sought and approved before any development takes place.

2.3 National Strategies

The Council will also seek to discharge its responsibilities identified by other Government Strategies, in so far as they impact on the objectives of the licensing function.

2.4 Local Strategies and Policies

The Council will consider applications with reference to other adopted local strategies and policies, including the following:-

1. The Council's Corporate Strategy;
2. The Community Safety Strategy;
3. Enforcement Policy.

2.5 Integrating Strategies

By consulting widely prior to this policy statement being published, the Council will endeavour to secure the proper integration with local crime prevention, planning, transport, tourism and cultural strategies.

There are a number of wider issues which may need to be given due consideration when dealing with applications. The Council's Licensing Committee will therefore receive reports, when appropriate, on the:

- 1 Needs of the local tourist economy.

- 2 Cultural strategy for the area.
- 3 Employment situation in the area and the need for new investment and employment where appropriate.
- 4 Local Crime Prevention Strategies.
- 5 Diversity and Equality Schemes.

The Council recognises that licensing applications should not be seen as a re-run of the planning application process and there will be a clear separation of the planning and licensing regimes to avoid duplication and inefficiency.

In order to avoid duplication with other statutory regimes, the Council will not attach conditions to a licence unless they are considered necessary for the promotion of the licensing objectives. Conditions will generally be considered unnecessary if they are already adequately covered by other legislation.

3 DECISION MAKING

3.1 Committee Terms of Reference

A Licensing Sub-Committee of three Councillors will sit to hear applications where representations have been received from interested parties and responsible authorities. Ward Councillors will not sit on a Sub-Committee involving an application within their ward.

The Licensing Committee will also sit to determine general licensing matters that have been delegated to it by the full Council that are not associated with the Gambling Act 2005.

Where a Councillor who is a member of the Licensing Committee is making or has made representations regarding a licence on behalf of an interested party, in the interests of good governance they will disqualify themselves from any involvement in the decision making process affecting the licence in question.

The Licensing Sub-Committee will also refer to the Licensing Committee any matter it is unable to deal with because of the number of its members who are unable to take part in the consideration or discussion of any matter or vote on any question with respect to it.

The Licensing Committee will refer to the full Council any matter it is unable to deal with because of the number of its members who are unable to take part in the consideration or discussion of any matter or vote on any question with respect to it.

Every determination of a licensing decision by the Licensing Committee or a Licensing Sub-Committee shall be accompanied by clear, cogent reasons for the decision. The decision and the reasons for that decision will be sent to the applicant and those who have made relevant representations as soon as practicable. A summary of the decision shall also be posted on the Council's website as soon as possible after the decision has been confirmed, where it will form part of the statutory licensing register required to be kept by the Council.

The Council's Licensing Officers will deal with all other licensing applications where either no representations have been received, or where representations have been received and it is agreed by the parties that a hearing is not necessary.

Decisions as to whether representations are irrelevant, frivolous or vexatious will be made by Council Officers, who will make the decisions on whether representations or applications for licence reviews should be referred to the Licensing Committee or Sub-Committee. Where representations are rejected, the person making that representation will be given written reasons as to why that is the case.

3.2 Allocation of Decision Making Responsibilities

The Council will be involved in a wide range of licensing decisions and functions and has established a Licensing Committee to administer them.

Appreciating the need to provide a speedy, efficient and cost-effective service to all parties involved in the licensing process, the Committee has delegated certain decisions and functions and has established a Sub-Committee to deal with them.

Many of the decisions and functions will be purely administrative in nature and the grant of non-contentious applications, including for example those licences and permits where no representations have been made, will be delegated to Council Officers.

The table shown at Appendix A sets out the agreed delegation of decisions and functions to Licensing Committee, Sub-Committee and Officers.

This form of delegation is without prejudice to Officers referring an application to a Sub-Committee or Full Committee if considered appropriate in the circumstances of any particular case.

3.3 Licensing Reviews

The Council will carry out a review of a premises licence where it has received a formal application for review in accordance with the Act that is relevant to one or more of the Licensing Objectives. Representations may be that activities, including the following, are taking place:

- 1 Use of licensed premises for the sale and distribution of Class A drugs and the laundering of the proceeds of drug crimes;
- 2 Use of licensed premises for the sale and distribution of illegal firearms;
- 3 Use of licensed premises for prostitution or the sale of unlawful pornography;
- 4 use of licensed premises as a base for organised criminal activity;
- 5 Use of licensed premises for the organisation of racist, homophobic or sexual abuse or attacks;
- 6 Use of licensed premises for the sale of smuggled tobacco or goods;
- 7 Use of licensed premises for the sale of stolen goods.
- 8 Children and/or vulnerable persons are put at risk.

Due consideration will be given to all relevant representations unless they fit the following:

- a) the grounds are frivolous;
- b) the grounds are vexatious;
- c) the grounds are irrelevant;
- d) the grounds will not cause the Licensing Authority to revoke or suspend a licence, or to remove, amend or attach conditions on the Premises Licence;

- e) the grounds are substantially the same as the grounds cited in a previous application relating to the same premises; or
- f) the grounds are substantially the same as representations made at the time the application for a Premises Licence was considered.

A premises licence may also be reviewed by the Licensing Authority on its own volition.

4 LOCAL STANDARDS

4.1 Applications

An application for a Premises Licence can only be made by a person who either holds an Operating Licence authorising him to carry out the activity in respect of which a Premises Licence is sought, OR has made an application for an operating licence which has not yet been determined.

Applications for the grant, transfer or variation of a Premises Licence must be accompanied by an assessment that demonstrates how the applicant will promote all the Licensing Objectives in the form of a written Operating Schedule. The applicant may ask the Council for advice as to the scope of information to be provided.

The level of detail to be provided will be advised by the Council and will be proportional to the scale and nature of the application made.

4.2 Assessment of Need

Unmet demand is not a criterion that will be taken into consideration when determining an application for a Premises Licence under the Gambling Act 2005.

4.3 Conditions

Conditions will be applied to licences that are proportionate and appropriate to the business, organisation or individual concerned. The Council will principally draw upon the advice issued by the Gambling Commission and attach conditions relative to the given circumstances of each individual case.

Conditions attached to Premises Licences will, so far as possible, reflect local crime prevention strategies. For example, closed circuit television cameras may be appropriate in certain premises.

4.4 Enforcement

The Council is a signatory to the Enforcement Concordat and will follow the principles set out in it. The concordat is based around the principles of consistency, transparency and proportionality.

The Enforcement Concordat proposes that a graduated response is taken where offences against legislation are found or where licence conditions have been contravened. An isolated administrative offence, such as failing to maintain certain records, may be dealt with by way of a written warning. More serious offences or repeated offences that have been committed over a period of time may result in a referral to Sub-Committee, the issue of a Formal Caution or a referral for prosecution.

Premises will be subject to a scheme of routine inspection, the frequency of which will be determined by the risks posed by the premises i.e. those premises considered to pose a greater risk will be subject to more frequent inspections than those posing a lower risk.

When determining risk, consideration will be given to:-

- The nature of the gambling activities carried out on the premises
- The location of the premises in relation to schools etc
- The procedure put in place by the management to meet the licensing objectives.

Additional random monitoring visits may be made, at the discretion of the licensing team, where it is considered necessary to meet the needs of the licensing objective or following receipt of complaint. The District will be monitored for unlicensed premises.

The Council will seek to work actively with the police in enforcing licensing legislation. It encourages the police to share information about licensees and licensed premises under the Crime and Disorder Act 1998.

4.5 Casinos

There is no resolution to prohibit casinos in the District at present. However the Council reserves the right to review this situation and may, at some time in the future, resolve not to permit casinos or, if licensed casinos are already operating, resolve not to permit any additional casinos.

Should the Council choose to make such a resolution, this will be a resolution of Full Council following considered debate, and the reasons for making the resolution will be given.

4.6 Unlicensed Family Entertainment Centre Gaming Machine Permits

Where a premises does not hold a Premises Licence but wishes to provide gaming machines, it may apply to the licensing authority for this permit.

An application for a permit may be granted only if the Licensing Authority is satisfied that the premises will be used as an unlicensed Family Entertainment Centre, and if the Chief Officer of Police has been consulted on the application. Relevant considerations to take into account would be the applicant's suitability, such as any convictions that they may have that would make them unsuitable to operate a family entertainment centre, the suitability of the premises in relation to their location and issues about disorder.

5 PREVENTING GAMBLING FROM BECOMING A SOURCE OF CRIME etc. OBJECTIVE

The Council will, when determining applications, consider whether the grant of a Premises Licence will result in an increase in crime and disorder arising from gambling activities.

The Gambling Commission, in its Guidance for local authorities, has noted that “disorder is intended to mean activity that is more serious and disruptive than mere nuisance. Factors to consider in determining whether a disturbance was serious enough to constitute disorder would include whether police assistance was required and how threatening the behaviour was to those who could see or hear it.” This authority agrees with this statement.

Applicants are encouraged to discuss the crime prevention procedures in their premises with the Council’s Licensing Officers and Avon and Somerset Constabulary before making a formal application.

In considering licence applications, the Council will particularly take into account the following: -

1. The design and layout of the premises;
2. The training given to staff in crime prevention measures appropriate to those premises;
3. Physical security features installed in the premises. This may include matters such as the position of cash registers or the standard of CCTV that is installed;
4. The likelihood of any violence, public order or policing problem if the licence is granted.

6 ENSURING THAT GAMBLING IS CONDUCTED IN A FAIR AND OPEN WAY OBJECTIVE

Generally, the Commission would not expect licensing authorities to become concerned with ensuring that gambling is conducted in a fair and open way, as this will be a matter for either the management of the gambling business and therefore subject to the Operating Licence, or will be in relation to the suitability and actions of an individual and therefore relevant to the Personal Licence, both of which are the responsibility of the Gambling Commission.

7 PROTECTION OF CHILDREN AND OTHER VULNERABLE PERSONS OBJECTIVE

7.1 Access to Licensed Premises

With limited exceptions, the access of children and young persons to those gambling premises which are adult only environments will not be permitted.

The Council will seek to limit the advertising for premises so that gambling products are not aimed at children or advertised in such a way that makes them particularly attractive to children.

The Council will consult with the Somerset Safeguarding Children Board on any application that indicates there may be concerns over access for children or vulnerable persons.

Where premises are subject to age restrictions and there are procedures in place to conduct age verification checks, these checks will be taken into account when considering the licence.

The Council will judge the merits of each separate application before deciding whether to impose conditions to protect children on particular categories of premises. This may include such requirements as:-

1. Supervision of entrances;
2. Segregation of gambling areas from areas frequented by children;
3. Supervision of gaming machines in non-adult gambling specific premises.

The 2005 Act provides for a Code of Practice on access to Casino premises by children and young persons and the Council will work closely with the Police to ensure the appropriate enforcement of the law.

7.2 Vulnerable Persons

The Council does not seek to prohibit particular groups of adults from gambling in the same way that it seeks to prohibit children, but it will assume for regulatory purposes, that “vulnerable persons” include:

1. People who gamble more than they want to;
2. People who gamble beyond their means; and
3. People who may not be able to make an informed or balanced decision about gambling due to a mental impairment, alcohol or drugs.

8 COMPLAINTS AGAINST LICENSED PREMISES

The Council will investigate complaints against licensed premises in relation to matters relating to the licensing objectives for which it has responsibility. In the first instance, complainants are encouraged to raise the complaint directly with the licence holder or business concerned to seek a local resolution.

Where an interested party has made either a valid representation about licensed premises or a valid application for a licence to be reviewed, the Council may initially arrange a conciliation meeting to address and clarify the issues of concern.

This process will not override the right of any interested party to ask that the licensing committee consider their valid objections, or for any licence holder to decline to participate in a conciliation meeting.

Due consideration will be given to all relevant representations unless they are considered to be frivolous, vexatious or repetitious.

9 FURTHER INFORMATION

Further information about the Gambling Act 2005, this Statement of Licensing Policy or the application process, including application forms and guidance notes, can be obtained from:-

Licensing Unit West Somerset District Council West Somerset House Killick Way, Williton, Taunton, Somerset, TA4 4QA Tel: 01643 703704 Fax: 01984 633022 licensingvhealth@westsomerset.gov.uk

Gambling Commission Berkshire House 168 – 173 High Holborn LONDON WC1V 7AA Tel: 020 7306 6219 www.gamblingcommission.gov.uk

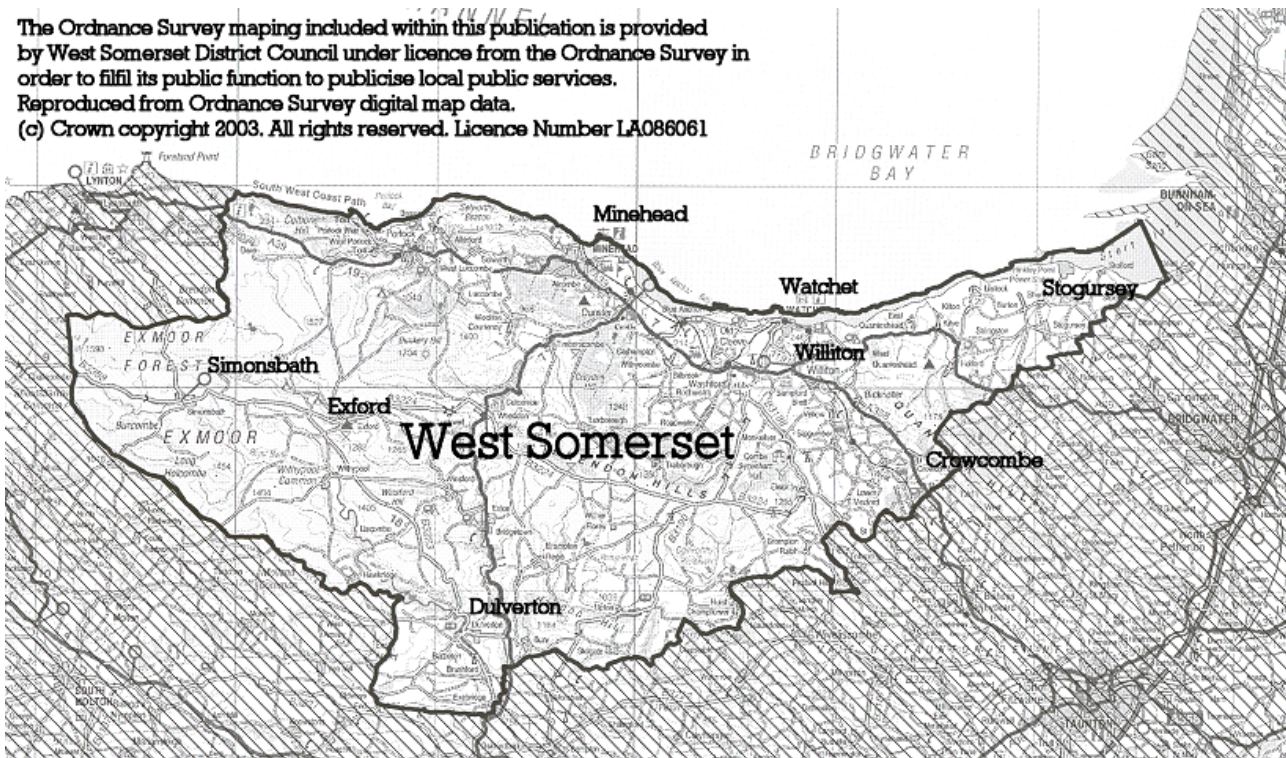
APPENDIX A

TABLE OF DELEGATIONS OF LICENSING FUNCTIONS

MATTER TO BE DEALT WITH	FULL COUNCIL	SUB-COMMITTEE	OFFICERS
Three year licensing policy	X		
Policy not to permit casinos	X		
Fee Setting – when appropriate			X (to be approved by Cabinet)
Application for premises licences		Where representations have been received and not withdrawn	Where no representations received/ representations have been withdrawn
Application for a variation to a licence		Where representations have been received and not withdrawn	Where no representations received/ representations have been withdrawn
Application for a transfer of a licence		Where representations have been received from the Commission	Where no representations received from the Commission
Application for a provisional statement		Where representations have been received and not withdrawn	Where no representations received/ representations have been withdrawn
Review of a premises licence		X	
Application for club gaming /club machine permits		Where representations have been received and not withdrawn	Where no representations received/ representations have been withdrawn
Cancellation of club gaming/ club machine permits		X	
Applications for other permits			X
Cancellation of licensed premises gaming machine permits			X
Consideration of temporary use notice			X
Decision to give a counter notice to a temporary use notice		X	

APPENDIX B

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APPENDIX C

RESPONSIBLE AUTHORITIES DETAILS

RELEVANT AUTHORITIES	ADDRESS	TELEPHONE NUMBER
West Somerset Council	Environmental Health & Licensing Team West Somerset House Killick Way Williton Taunton Somerset, TA4 4QA	01643 703704
Avon and Somerset Constabulary	Liquor Licensing Bureau PO Box 2781 Bristol BS2 2AS	0117 945 5154
Devon & Somerset Fire and Rescue	West Somerset Area Command Taunton/Bridgwater Group Chiltern House Silver Street Taunton TA1 3DH	01823 365352
Safeguarding Children's Board	Somerset County Council County Hall Taunton Somerset TA4 1DY	01823 355455
Gambling Commission	Victoria Square House Victoria Square Birmingham, B2 4BP	0121 230 6500
HM Revenue and Customs	HM Revenue & Customs National Registration Unit Portcullis House 21 India Street Glasgow G2 4PZ	0845 010 9000
West Somerset Council Planning Department OR	Planning Manager West Somerset House Killick Way Williton Taunton Somerset TA4 4 QA	01643 730704
Exmoor National Park Planning Authority	Planning Manager Exmoor House Dulverton Taunton Somerset	01398 323665
West Somerset Council Environmental Protection	Environmental Protection Unit West Somerset Council West Somerset House Killick Way Williton Taunton Somerset TA4 4 QA	01643 703704

CONSULTEES

Elected Members, West Somerset Council
Town & Parish Councils in West Somerset
The Gambling Commission
BACTA
Avon & Somerset Constabulary
Devon and Somerset Fire & Rescue Service
Planning Manager, West Somerset Council
Planning Manager, Exmoor National Park
Safeguarding Children Board, Somerset County Council
HM Revenues & Customs
LACORS
West Somerset Crime & Disorder Reduction Partnership
Association of British Bookmakers (via Bond Pearce)
Representatives of the holders of various licences for premises in the District who will be affected by this policy
Members of the public who will be affected by this policy

Note: This list is not intended to be inclusive. Comments and observations will be welcome from anyone who will be affected by this policy.