



# PAPER B

Purpose: For Decision

## Committee report

Committee	<b>LICENSING SUB COMMITTEE</b>
Date	<b>MONDAY, 13 OCTOBER 2014</b>
Title	<b>TO DETERMINE AN APPLICATION FOR A REVIEW OF THE PREMISES LICENCE UNDER SECTION 51 OF THE LICENSING ACT 2003 FOR CRAB AND LOBSTER TAP, GROVE ROAD, VENTNOR, ISLE OF WIGHT.</b>
Report Author	<b>BILL MURPHY HEAD OF PLANNING AND REGULATORY SERVICES</b>

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### BACKGROUND

1. The provision for reviewing a premises licence exists to protect the community where problems associated with crime and disorder, public safety, public nuisance or the protection of children from harm are occurring at premises where a premises licence has been granted under the Licensing Act 2003.
2. At any stage following the grant of a premises licence, a responsible authority or other person may apply to the licensing authority for a review of the licence on the grounds that one or more of the four licensing objectives is not being upheld.
3. Licensing authorities may initiate their own reviews of premises licences. In addition, officers of the local authority who are specified as responsible authorities in the Licensing Act 2003 may request reviews on any matter which relates to the promotion of one or more of the licensing objectives.
4. A premises licence for the Crab and Lobster Tap was granted in September 2005. The current holder of the premises licence is Punch Taverns PLC. The Designated Premises Supervisor (DPS) is Mr David Weedon. The current licence can be found at Appendix A.
5. Environmental Health, as a responsible authority under the Licensing Act 2003, have applied for a review of the premises licence for this licence under Section 51 of the Licensing Act 2003 in relation to the licensing objective –
  - The Prevention of Public Nuisance
6. Noise complaints regarding customers outside these premises and/or music being provided have been received intermittently since 2007. Complaints received this year and log sheets that were returned to the department detailing how residents are

being affected, led to Environmental Health visiting the area to investigate this further.

7. Environmental Health Officers have witnessed noise from music and/or customers outside at an unacceptable level. This has been discussed with the DPS and the licence holder has also been made aware. Following this, the level of noise has still been found to be unacceptable and Environmental Health therefore believes the above objective is not being upheld.
8. With regard to the history of these premises and its licence, it should be noted that prior to the Licensing Act 2003 (the Act) coming into force in 2005, the majority of public houses ceased selling alcohol at 23:00hrs. When the Act came into effect, as there were no specific restrictions applicable to the hours premises could operate, many applicants requested later hours than they were previously permitted to.
9. The licence for these premises in its current form allows licensable activities to be provided until 1am on Friday and Saturday nights, midnight during the week and 22:30hrs on Sundays with virtually no conditions to ensure nuisance is prevented.
10. The current hours permitted by the licence for these premises were granted in 2005 as no objections were received. It is thought however, that previous occupiers at these premises have not used the full extent of the permitted hours. Mr Weedon took over the premises in April 2013 and has provided activities as permitted by the licence.
11. The use of the premises for activities later than previously, together with the smoking ban, which came into force in 2007 requiring those smoking to do so outside, appears to have prompted the complaints.
12. Environmental Health therefore believes the current licence does not ensure the prevention of public nuisance objective is sufficiently upheld and that steps are required to ensure that this objective is continually promoted.
13. The full application for review can be found at Appendix B.

### CONSULTATION

14. The Licensing Act 2003 prescribes a twenty eight day consultation period, commencing the day after the review application has been correctly served. The licensing authority is required to advertise the application at or on the premises and at the Council offices.
15. This review application was received on 19 August 2014. The application was advertised at the premises, at the Council offices and on the Council's web site. The consultation period ended on the 16 September 2014.

16. The outcome of the consultation in respect of this review application is as follows:

Responsible Authorities

Children's Services	No Representation made
Fire and Rescue Service	No Representation made
Trading Standards Service	No Representation made
Planning Services	No Representation made
Licensing Authority	No Representation made
Public Health	Representation made (Appendix C)
Police	Representation made (Appendix C)

17. Public Health have indicated that they support the application for review.
18. Police have submitted representations detailing the complaints they have received regarding these premises, including complaints relating to noise. Their representations also include that they had given a verbal warning following a breach of licence condition in July 2013. The representations can be found at Appendix C.

Other Persons

19. The licence holder has indicated that they do not accept the conditions proposed by Environmental Health and will be providing further written comments in due course. At the time of writing the report however, no additional information, other than confirmation of this, had been received.
20. The Designated Premises Supervisor (DPS) has submitted representations in relation to the application for review. These can be found at Appendix D. Mr Weedon explains in his representations that he takes his responsibilities as DPS very seriously. He also confirms that he understands that he is accountable if issues arise and that he strives to run the premises in a safe way.
21. Mr Weedon also explains in order to assist with preventing nuisance, he has implemented changes to the operation of the premises, such as ceasing to provide entertainment on Friday and Saturday nights, ceasing the sale of alcohol at an earlier time and also a "whisper campaign" to encourage customers to be quieter whilst in attendance at the premises and when they leave. It should be noted that Environmental Health have not requested such measures to be implemented.
22. Mr Weedon includes in his representations that he does not believe all reported allegations of nuisance are attributable to these premises as Grove Road is a road commonly used for gaining access to upper Ventnor from the town centre.
23. He also states that he does not believe applying any proposed modifications to the licence between Monday and Thursday is appropriate, as the allegations of noise

nuisance appear to relate to Friday and Saturday nights. The full representation can be found at Appendix D.

24. 27 valid representations have been received from other persons relating to the licensing objectives:
- Prevention of public nuisance
  - Prevention of crime and disorder
  - Public safety
25. Two of these representations are from nearby residents in support of the review application. These can be found at Appendix E. One resident states that they believe there is insufficient monitoring of customers, which leads to noise as customers leave the premises and the area and customers taking drinks outside.
26. The second nearby resident explains the impact of noise from the premises that they have experienced.
27. There have been 25 other representations received. These can be found at Appendix F. A number of which are from people who regularly attend the premises or who live nearby and confirm they have not experienced nuisance:
- Eight people claim to attend the premises regularly and do not believe the noise to be excessive.
  - Seven people state that they live nearby (6 of which are on the same road) and also claim to not be disturbed by these premises.
  - Another person, who also resides on the same road, has stated that they previously had been disturbed on occasions by people outside, but following the measures they have recently implemented, they no longer find the noise disturbing.
  - Thirteen of the representations also include that they believe the premises are well run and that the management take their responsibilities seriously by taking steps to reduce noise and that they provide a safe establishment. It has also been stated that it may well be customers from other premises passing by causing noise.
28. The sub-committee will notice that there are a number of sections “blacked out” within the representations. This is because the comments made are irrelevant to the application and therefore cannot be considered under the Licensing Act 2003.
29. As there has been reference made to customers in the road, Island Roads were contacted for comments; their reply is below:

*For and on behalf of the Highway Authority, and with regard to our network management duty, I can confirm I have no comments or objections to the review of the Premises Licence for the Crab & Lobster Tap, Grove Road, Ventnor. I've checked the accident reports and there is only one recorded personal injury in the last three years in the area, and this was not related to the Crab & Lobster Tap or its customers.*

## FINANCIAL/BUDGET IMPLICATIONS

30. Broadly, Council expenditure on licensing matters, and specifically those administered and enforced through Planning and Regulatory Services, balances income generated from fees.

## LEGAL IMPLICATIONS

31. The 28 day consultation period ended on 16 September 2014. Schedule 1 of the Licensing Act (Hearings) Regulations 2005 states that the application must be determined within 20 working days of the end of the consultation period.

### National Guidance

32. The following sections from the national guidance issued under section 182 of the Licensing Act 2003 are considered relevant to this application:

33. Each application on its own merits –

1.17 Each application must be considered on its own merits and any conditions attached to licences and certificates must be tailored to the individual style and characteristics of the premises and events concerned. This is essential to avoid the imposition of disproportionate and overly burdensome conditions on premises where there is no need for such conditions. Standardised conditions should be avoided and indeed, may be unlawful where they cannot be shown to be appropriate for the promotion of the licensing objectives in any individual case.

34. Public nuisance

2.18 The 2003 Act enables licensing authorities and responsible authorities, through representations, to consider what constitutes public nuisance and what is appropriate to prevent it in terms of conditions attached to specific premises licences and club premises certificates. It is therefore important that in considering the promotion of this licensing objective, licensing authorities and responsible authorities focus on the effect of the licensable activities at the specific premises on persons living and working (including those carrying on business) in the area around the premises which may be disproportionate and unreasonable. The issues will mainly concern noise nuisance, light pollution, noxious smells and litter.

2.19 Public nuisance is given a statutory meaning in many pieces of legislation. It is however not narrowly defined in the 2003 Act and retains its broad common law meaning. It is important to remember that the prevention of public nuisance could therefore include low-level nuisance perhaps affecting a few people living locally as well as major disturbance affecting the whole community. It may also include in appropriate circumstances the reduction of the living and working amenity and environment of other persons living and working in the area of the licensed premises.

- 2.20 Conditions relating to noise nuisance will normally concern steps appropriate to control the levels of noise emanating from premises. This might be achieved by a simple measure such as ensuring that doors and windows are kept closed after a particular time, or more sophisticated measures like the installation of acoustic curtains or rubber speaker mounts. Any conditions appropriate to promote the prevention of public nuisance should be tailored to the type, nature and characteristics of the specific premises. Licensing authorities should be aware of the need to avoid inappropriate or disproportionate measures that could deter events that are valuable to the community, such as live music. Noise limiters, for example, are very expensive to purchase and install and are likely to be a considerable burden for smaller venues.
- 2.21 As with all conditions, those relating to noise nuisance may not be appropriate in certain circumstances where the provisions of the Environmental Protection Act 1990, the Noise Act 1996, or the Clean Neighbourhoods and Environment Act 2005 adequately protect those living in the area of the premises. But as stated earlier in this Guidance, the approach of licensing authorities and responsible authorities should be one of prevention and when their powers are engaged, licensing authorities should be aware of the fact that other legislation may not adequately cover concerns raised in relevant representations and additional conditions may be appropriate.
- 2.22 Where applications have given rise to representations, any appropriate conditions should normally focus on the most sensitive periods. For example, music noise from premises usually occurs from mid-evening until either late-evening or early-morning when residents in adjacent properties may be attempting to go to sleep or are sleeping. In certain circumstances, conditions relating to noise immediately surrounding the premises may also prove appropriate to address any disturbance anticipated as customers enter and leave.

### 35. Hearings and determining applications

- 9.39 The authority's determination should be evidence-based, justified as being appropriate for the promotion of the licensing objectives and proportionate to what it is intended to achieve.
- 9.40 Determination of whether an action or step is appropriate for the promotion of the licensing objectives requires an assessment of what action or step would be suitable to achieve that end. Whilst this does not therefore require a licensing authority to decide that no lesser step will achieve the aim, the authority should aim to consider the potential burden that the condition would impose on the premises licence holder (such as the financial burden due to restrictions on licensable activities) as well as the potential benefit in terms of the promotion of the licensing objectives. However, it is imperative that the authority ensures that the factors which form the basis of its determination are limited to consideration of the promotion of the objectives and nothing outside those parameters.

As with the consideration of licence variations, the licensing authority should consider wider issues such as other conditions already in place to mitigate potential negative impact on the promotion of the licensing objectives and the track record of the business. Further advice on determining what is appropriate when imposing conditions on a licence or certificate is provided in Chapter 10. The licensing authority is expected to come to its determination based on an assessment of the evidence on both the risks and benefits either for or against making the determination.

### 36. Proportionality

10.10 The 2003 Act requires that licensing conditions should be tailored to the size, type, location and characteristics and activities taking place at the premises concerned. Conditions should be determined on a case by case basis and standardised conditions which ignore these individual aspects should be avoided. Licensing authorities and other responsible authorities should be alive to the indirect costs that can arise because of conditions. These could be a deterrent to holding events that are valuable to the community or of the funding of good and important causes. Licensing authorities should therefore ensure that any conditions they impose are only those which are appropriate for the promotion of the licensing objectives.

### 37. Hours of trading

10.11 The Government acknowledges that different licensing strategies may be appropriate for the promotion of the licensing objectives in different areas. The 2003 Act gives the licensing authority power to make decisions regarding licensed opening hours as part of the implementation of its licensing policy statement and licensing authorities are best placed to make decisions about appropriate opening hours in their areas based on their local knowledge and in consultation with responsible authorities. However, licensing authorities must always consider each application and must not impose predetermined licensed opening hours, without giving individual consideration to the merits of each application.

### 38. Reviews

11.10 Where authorised persons and responsible authorities have concerns about problems identified at premises, it is good practice for them to give licence holders early warning of their concerns and the need for improvement, and where possible they should advise the licence or certificate holder of the steps they need to take to address those concerns. A failure by the holder to respond to such warnings is expected to lead to a decision to apply for a review. Co-operation at a local level in promoting the licensing objectives should be encouraged and reviews should not be used to undermine this co-operation.

11.18 However, where responsible authorities such as the police or environmental health officers have already issued warnings requiring improvement – either orally or in writing – that have failed as part of their own stepped approach to address concerns, licensing authorities should not merely repeat that

approach and should take this into account when considering what further action is appropriate.

11.19 Where the licensing authority considers that action under its statutory powers is appropriate, it may take any of the following steps:

- modify the conditions of the premises licence (which includes adding new conditions or any alteration or omission of an existing condition), for example, by reducing the hours of opening or by requiring door supervisors at particular times;
- exclude a licensable activity from the scope of the licence, for example, to exclude the performance of live music or playing of recorded music (where it is not within the incidental live and recorded music exemption);
- remove the designated premises supervisor, for example, because they consider that the problems are the result of poor management;
- suspend the licence for a period not exceeding three months;
- revoke the licence.

11.20 In deciding which of these powers to invoke, it is expected that licensing authorities should so far as possible seek to establish the cause or causes of the concerns that the representations identify. The remedial action taken should generally be directed at these causes and should always be no more than an appropriate and proportionate response.

#### Implications under the Crime and Disorder Act 1998

39. Members are advised that without prejudice to any other obligation imposed on it, it shall be the duty of each authority to which this section applies to exercise its functions with due regard to the likely effect of the exercise of those functions on, and the need to do all that it reasonably can to prevent, crime and disorder in its area.

#### Human Rights

40. Members are advised that this application must be considered against the background of the implications of the Human Rights Act 1998.
41. There are three convention rights, which need to be considered in this context:

##### Article 6 - Right to a Fair Trial

In the determination of his civil rights and obligations or of any criminal charge against him, everyone is entitled to a fair and public hearing within a reasonable time by an independent and impartial tribunal established by law.

It has been held that the fact that there is a right of appeal to the Magistrates' Court from any decision of the Licensing Authority is sufficient to make the Council's licensing system compliant with the convention rights.



## Article 8 - Right to Respect for Private and Family Life

Everyone has the right to respect for his private and family life, his home and his correspondence. In the case of article 8 there shall be no interference by a public authority with the exercise of this right except as such in accordance with the law and is necessary on a democratic society in the interests of national security, public safety or the economic wellbeing of the country, for the prevention of disorder and crime, for the protection of health or morals or for the protection of the rights and freedoms of others.

## Article 1 - First Protocol Protection of Property

Every natural or legal person is entitled to the peaceful enjoyment of his possessions. In the case of Article 1 of the first protocol it states that “no one shall be deprived of his possessions except in the public interest and subject to the conditions provided for by law and the general principles of international law. The preceding provisions (of which articles 6 and 8 are but two) shall not however in any way impair the right of the state to enforce such laws as it deems necessary to control the use of the property in accordance with general interest or to secure the payment of taxes or other contributions or penalties”.

42. The Licensing Authority acknowledges the right of businesses in its area to operate, but equally acknowledges the fact that this must be balanced against the rights of residents not to be disturbed by unreasonable noise and nuisance caused by licensed premises. The Sub-Committee needs to be clear as to the rights granted and the need to ensure that the reasons given for any interference are proportionate and in accordance with the Council’s legitimate aim.
43. It is considered that the following paragraphs from the Licensing Authority’s Statement of Licensing Policy 2014 – 2017 have a bearing upon the application. Members’ attention in respect of this particular application is drawn to:

Paragraph 1	Introduction	All
Paragraph 2	Licensing Objectives	All
Paragraph 3	Licensable Activities	All
Paragraph 4	Integration of Strategies and Other Legislation	All
Paragraph 5	Approach to Licensing Applications	All
Paragraph 6	Cumulative Effect	N/A
Paragraph 7	Representations, Reviews, and Appeals	All
Paragraph 8	Enforcement	N/A
Paragraph 9	Operating Schedules	N/A

## EQUALITY AND DIVERSITY

44. The council as a public body is subject to general and specific duties under equality and diversity legislation and as such has a duty to go beyond prohibition and publish and promote service improvements by engaging with the local community to assess the impact of any decision on the local community. As a requirement under the Equality Act 2010 and further improvements to diversity legislation all local authorities are required to impact assess their services, policies/strategies and decisions with regard to diversity legislation – race, disability, gender, age, sexual orientation and religion/belief. (NB: this list is not exhaustive, it does cover current legislation but future development could also include poverty and social inclusion as an example).
45. There is no requirement for an equality impact assessment to be carried out.

## OPTIONS

- Option 1: To retain the licence in its current form.
- Option 2: To modify the conditions of the licence
- Option 3: To exclude a licensable activity from the scope of the licence
- Option 4: To remove the designated premises supervisor
- Option 5: To suspend the licence for a period not exceeding three months
- Option 6: To revoke the licence

## RISK MANAGEMENT

46. With regard to Option 1: To retain the existing permitted hours and licence conditions would allow licensable activities to continue in the current form and may not address the concerns raised in the application for review and therefore could compromise the licensing objectives.
47. With regard to Option 2: Modifying the conditions of the licence or the hours activities are permitted may impact on the manner in which the licence holder conducts his business and may have financial implications for the licence holder. This decision could be appealed by any party if the modifications are not proportionate to the concerns raised and/or if they do not assist in upholding the licensing objectives.
48. With regard to Option 3: Members may wish to consider excluding a particular licensable activity, which may address issues in respect of an adverse impact on the licensing objectives. This course of action may impact on the manner in which the licence holder conducts his business and may have financial implications and therefore must be proportionate. Where measures could be implemented to control the activities and promote the licensing objectives, modifying the licence may be a more appropriate course of action. This option has not been suggested by any party.
49. With regard to Option 4: Members may wish to remove the DPS, if they believe that new management is required to ensure the licensing objectives are promoted. This option has not been suggested in the application or representations.

50. With regard to Options 5 and 6: The suspension or revocation of the licence would have an obvious impact on the livelihood of the licence holder and DPS. Such action must be proportionate to the application and representations. Neither of these options has been suggested by any party as an appropriate course of action.

## EVALUATION

51. The national guidance suggests that authorities seek to establish the causes of concern, in order to identify the most appropriate course of action of the options available. The guidance also states that the authority's determination should be evidence-based, justified as being appropriate for the promotion of the licensing objectives and proportionate to what it is intended to achieve.
52. Environmental Health believes that the prevention of public nuisance objective is currently being compromised by the entertainment provided at the premises, the customers outside the premises and the customers dispersing from the area.
53. The application for review of the premises licence details the visits to the area that have been carried out by Environmental Health, including their findings. Out of the ten visits to residents' houses or the area, there were three occasions when the noise appeared to be at an acceptable level. Three occasions when noise from customers outside the premises was at a level that could cause disturbance and four occasions when the noise from customers outside and entertainment was at a level that could cause disturbance.
54. One of the residents has provided details of how they are disturbed by the entertainment and noise from customers. This appears to be corroborated by another resident who submitted comments confirming they believed noise from customers can be excessive.
55. A number of the representations received, including those from residents who also live very close to the premises, confirm that no noise nuisance has been experienced by them.
56. It has also been stated that Grove Road is used by members of the public heading to upper Ventnor from the town centre and therefore some of the reports of alleged nuisance may not be attributable to customers of these premises.
57. It should be noted that Environmental Health are the professional body who deal with noise nuisance and the information they have provided is what they have witnessed, having visited the area and residents' properties.
58. If the Committee are satisfied that this objective is being compromised based on the evidence provided, then to retain the licence in its current form would not be appropriate in securing the prevention of public nuisance.
59. The DPS has implemented changes at the premises with a view to assisting in ensuring that nuisance is prevented. It should be noted that such changes are not reflected within the licence and therefore, these measures cannot be enforced and could be changed at any time.

60. There has been no suggestion of suspension or revocation of the licence and no suggestion to remove entertainment from the licence or removing the DPS. These options would therefore be disproportionate and inappropriate.
61. By modifying the licence, the sub-committee will be able to allow licensable activities to continue whilst ensuring that the licensing objectives are upheld.
62. Environmental Health has suggested several modifications to the licence that they believe may assist in promoting the objectives.
63. With regard to entertainment, they have requested a condition that requires the noise level to not exceed “barely audible”. Such a condition enables the licensee to provide entertainment and rather than being prescriptive, gives them the freedom to implement their own measures as they see fit to control the level of noise and comply with this restriction.
64. With regard to noise from customers outside and customers dispersing from the area there are possible conditions that could be attached to the licence. The committee could:
- Limit the number of smokers permitted outside at any one time
  - Require the use of SIA registered door supervisors to control the customers outside
65. Environmental Health have stated that although it is an option, reducing the number of customers permitted outside may not adequately promote the objectives. During a visit to the area, as few as 5 people outside have been witnessed creating noise at an unacceptable level. This measure may therefore not prevent public nuisance adequately.
66. Although SIA door supervisors can enforce restrictions on the number of people in the area and deal with issues of disorder when they arise, they cannot necessarily prevent noise from occurring. This option may therefore not be proportionate or adequately address the issues raised in the review application.
67. Environmental Health recommend the following modifications to the licence:
- Sale of alcohol for consumption off the premises to cease at 21:00hrs to prevent customers taking alcohol outside
  - Reducing the hours for activities (suggested 23:00hrs with all customers to leave by 23:30hrs)
- or
- If the committee felt that a reduction in hours would be disproportionate, then a condition requiring that no admittance or re-admittance for customers after 23:00hrs is permitted could be considered
68. By preventing off-sales from being permitted after 21:00hrs, customers will not be able to take drinks outside and therefore would not remain outside for a prolonged amount of time. This amendment would replace the current condition 6 of the licence.

69. Reducing the hours that licensable activities are permitted should ensure that people are not in the area to cause nuisance after a certain time and therefore uphold the licensing objectives.
70. Mr Weedon has stated in his representations that he believes modifications to the hours should not apply between Monday and Thursday, as complaints have not been received in relation to these days. The current licence allows licensable activities until midnight on these days.
71. Environmental Health's visits to the area indicated that activities taking place after 23:00hrs lead to noise nuisance. As a result they have recommended a reduction in the hours for activities to 23:00hrs with the premises being closed to the public by 23:30hrs. It is proposed that these amended hours will apply to all days.
72. If the sub-committee agree that the hours need to be reduced in order to prevent nuisance, they will need to ensure that the problem is not simply displaced to other days.
73. The committee must be satisfied that this action is proportionate and must also take into consideration the non-standard timings currently permitted by the licence and determine whether these require modification also.
74. Environmental Health have stated in their application for review that if the sub-committee believed such action to be disproportionate, they could consider a restriction on the last time for entry and re-entry to the premises. This would prevent customers from going outside of the premises after this time, unless they are leaving.
75. If the sub-committee agree that the objective is being compromised and they decide to modify the licence and are considering this option, they will need to be satisfied that such action will address the cause of nuisance.
76. The sub-committee must have regard to all of the representations made and the evidence it hears as well as the national guidance issued under Section 182 of the Licensing Act 2003 and the Council's own Statement of Licensing Policy.
77. Their determination should be evidence-based, justified as being appropriate for the promotion of the licensing objectives and proportionate to what it is intended to achieve.
78. The Committee should determine the application in accordance with section 52 of the Licensing Act 2003 and The Licensing Act (Hearings) Regulations 2005 and with a view to promoting the licensing objectives, which are:
  - a. The Prevention of Crime and Disorder
  - b. The Prevention of Public Nuisance
  - c. Public Safety
  - d. The Protection of Children from Harm

## RECOMMENDATION

79. Members should determine the application in accordance with section 52 of the Licensing Act 2003 and The Licensing Act (Hearings) Regulations 2005.

### APPENDICES ATTACHED

[Appendix A](#) Current Premises Licence for Crab and Lobster Tap, Ventnor

[Appendix B](#) Application for review of the premises licence under section 51 of the Licensing Act 2003

[Appendix C](#) Representations received from responsible authorities

[Appendix D](#) Representations received from the Designated Premises Supervisor (DPS)

[Appendix E](#) Representations received from other persons in support of the review application

[Appendix F](#) Representations received from other persons opposed to the review application

### BACKGROUND PAPERS

- Isle of Wight Council Licensing Authority Statement of Licensing Policy 2014 – 2019.  
<http://www.iwight.com/azservices/documents/1226-Statement-of-Licensing-Policy-2014-2019-Adopted-v1.pdf>

Contact Point: Miss Claire Thomas, Licensing Officer, ☎ 823159 ext 6128  
e-mail [claire.thomas@iow.gov.uk](mailto:claire.thomas@iow.gov.uk)

BILL MURPHY  
Head of Planning and Regulatory Services