

Summary of Online Responses to the Board's Policy Consultation 2023

In total there were 90 responses received to the online consultation. Not many people responded to all the questions. Responses were also received separately from West Lothian Council and Alcohol Focus Scotland (AFS). The AFS response was a generic one not tailored to the specific issues highlighted in the survey. Comments made by AFS about what the policy should contain have been taken on board by the Licensing Team in making suggested changes to the policy. Comments made by the Council have been highlighted in each section below.

A response from NHS Lothian was made through the online survey. No response was received from Police Scotland.

Question 1(a): Do you consider that any changes should be made to the curfew condition?

Of the 85 responses received 80% did not consider that any change needs to be made to the curfew conditions, 20% i.e. 18 responders thought that changes needed to be made.

Question 1(b): Please give reasons for your answer

There were 28 responses to this question. Common themes in the responses were identified. Of the 28 responses received:

- 10 responders indicated that they felt the current curfew condition is satisfactory.
- 7 responders felt the current condition discriminated against smokers or discouraged smoking. The main reason given for this was that smokers are required to leave the premises to smoke, and might not or are not readmitted after the curfew. 1 responder stated that although they found the curfew discriminatory, it might be difficult for premises to monitor admissions after 1am otherwise. 2 additional responders stated that they felt premises either had or should have designated outdoor smoking areas.
- 3 responders felt that the curfew should be earlier, with 2 suggesting 12pm as a new curfew time. Conversely, 2 responders indicated that they felt the curfew should be later than 1am.
- 3 responders suggested the current curfew condition helps to reduce alcohol consumption. Conversely, 1 responder felt it encouraged alcohol consumption.
- 4 responders felt the current condition discouraged anti-social behaviour.
- 2 responders were concerned the current condition was or might not be enforced by premises.
- 1 responder felt that the current condition was detrimental to premises due to the increased need for door staff to monitor entry and re-entry.

COMMENTS FROM THE LICENSING TEAM

The curfew condition has been in place for many years. It would appear that some of the persons responding negatively are not aware that most nightclub premises have smoking areas accessible from within their premises and that their use is unaffected by the curfew condition. The Council response indicated that it was content with the curfew condition.

RECOMMENDATION

No change should be made to the curfew condition.

Question 2. Do you consider that any changes should be made to the children and young persons' conditions?

Of the 43 responses received, 84% considered no changes should be made and 16% i.e. 10 responders were in favour of changes to the children and young persons' conditions. None referred to any evidence or specific issues. No common themes in the responses were identified.

- 1 responder stated that the 9pm deadline was too early in summer and there should be no requirement to have a meal conversely 1 responder stated that the deadline for under 18s access should be 8pm
- 1 responder stated that under 18s should only be allowed in licensed premises when having a meal and when accompanied by adults
- 1 responder stated that under 18s should only be allowed in restaurants after 8pm and the deadline for their access should be 8pm for all other premises
- 1 responder stated that under 18s should not be allowed in licensed premises at all

COMMENTS FROM THE LICENSING TEAM

There is little support for changes to the children and young persons' conditions. The Council response indicated that it was content with the conditions.

RECOMMENDATION

No change should be made to the children and young persons' conditions.

Question 3 – Minor changes were proposed to the outdoor area conditions. Do you consider that any changes should be made to the outdoor area conditions?

Of the 49 responses received, 61% were in favour of no changes being made to the amended outdoor area conditions and 39% i.e. 10 responders wished to see changes made. The common theme of those in favour of change was that the closing time for outdoor areas should be extended.

7 of the responders suggested that the 9pm deadline should be extended. 2 suggested that outdoor areas should be licensed until closing time, 3 suggested a 10pm closing time for outdoor areas (1 said only if not adjacent to houses) and the other 2 did not suggest a later time.

In relation to amplified music 1 responder agreed that this should not be allowed, three responders said amplified music should be allowed only if it did not affect residential areas.

COMMENTS FROM THE LICENSING TEAM

The majority of responders i.e. 30 out of 49 agreed that the proposed minor changes should be made to the outdoor area conditions. The Council response indicated that it was content with the proposed changes.

None of the responders who disagreed referred to any evidence or specific issues.

RECOMMENDATION

The proposed minor changes to the outdoor area conditions should be made. Before these conditions are imposed on any licence the applicants are able to submit reasons why they should not be imposed in relation to their premises and the Board would make a decision on whether the conditions were appropriate to that premises.

Question 4. Do you agree with the current policy in relation to the hours during which children and young persons can access licensed premises?

Of the 32 responses received, 72% considered no changes should be made to the current policy and 28% i.e. 9 responders were in favour of changes. None referred to any evidence or specific issues.

1 responder suggested that children could stay later than 10 as long as they were not running around. Another disagreed and said that the policy about functions and restaurants was fine but 10pm in bars which just happen to serve snacks is not the place for kids. There were no other comments from those who disagreed with the policy or specific suggestions for change.

COMMENTS FROM THE LICENSING TEAM

The majority of responders agreed with the current policy on children and young persons' hours. The Council response also indicated that it was content with the current policy on children and young persons' hours.

None of the responders who disagreed referred to any evidence or suggested any specific changes.

RECOMMENDATION

No change should be made to the policy of when children and young persons can be allowed in licensed premises.

Question 5. What impact do you consider that the current policy for on sales licensed hours has on you or people in your community? Please give examples and indicate whether these impacts are positive or negative.

16 responses were received.

- Positive; social opportunity for people, good to have thriving local businesses and a variety of options for residents. Negative; Hours are too late for non night club premises. These premises are near or co-exist in residential areas, where there is problematic antisocial and noise nuisance issues for neighbours of these businesses.
- Generally, the timings for on sale consumption are reasonable. Having a 1am curfew can assist with public safety, public nuisance. However, the proposal to extend terminal hour to 4am in December to January provides an opportunity to increase alcohol consumption at a time when more people access licensed premises. This approach is potential at odds with Scottish Government's attempt to reduce alcohol harms and whole population consumption. Alcohol harms have increased in the past few years. This is demonstrated by the increased level of alcohol related hospital admissions and alcohol specific deaths. In addition, extending the terminal hour may also impact on wider public services in terms of hospital admissions and public disorder.
- Should be allowed at anytime as long there is no noise or disorder issues.
- Generally, the timings for on sale consumption are reasonable. Having a 1am curfew can assist with public safety, public nuisance. However, the proposal to extend terminal hour to 4am in December to January provides an opportunity to increase alcohol consumption at a time when more people access licensed premises. This approach is potential at odds with Scottish Government's attempt to reduce alcohol harms and whole population consumption. Alcohol harms have increased in the past few years. This is demonstrated by the increased level of alcohol related hospital admissions and alcohol specific deaths. In addition, extending the terminal hour may also impact on wider public services in terms of hospital admissions and public disorder.
- It works positively to respect each premises operational wishes.

- Gives families a meeting point to socialise with other. Finishing times are not in the middle of the night allowing people to be able still to have a good night sleep if there is any noise at finishing time.
- Doesn't impact my community as we have no immediate licensed premises nearby. I think the current licensing sale hours are reasonable
- The licensing hours are totally fine. Enough hours for people to enjoy their alcohol but not too long to encourage people to drink more which then escalates antisocial behaviour in some instances
- I live near the centre of Bathgate, and the mess, violence and drug taking are now so prevalent at the weekend I never walk home. Combined with police hiding in the cars or at Livingston police station you've got an unsafe environment for women and girls
- Unsure
- Closing early Sunday to Wednesday should be introduced
- Little difference.
- No opinion
- Open to late
- The hours seem fine, i agree that sales should be restricted as they are already however i would also support them being more restricted.

COMMENTS FROM THE LICENSING TEAM

The majority of responders gave positive views of the policy on sales hours.

Question 6. What changes could be made to on sales licensed hours that would have a more positive impact in your community? Please give examples of how this would make a difference.

12 responses were received. 4 responders suggested that hours should be decreased. 1 responder suggested that all premises should have longer hours. The other 7 responders were either happy with the hours or made no comment. None of the responders who suggested decreased hours referred to any evidence or specific issues.

COMMENTS FROM THE LICENSING TEAM

The majority of responders agreed with the current policy regarding on sales licensed hours. None of responders who suggested decreased hours referred to any evidence or specific issues.

RECOMMENDATION

No change should be made to the policy regarding on sales hours.

Question 7. Do you agree with the suggested festive policy?

31 responses were received. 61% agreed and 39% i.e. 12 responders disagreed. 6 responders suggested that nightclub hours were too late and 1 responder suggested that all premises should have nightclub hours. West Lothian Council's response indicated that it disagreed with the policy.

The Council response stated –

“The proposal to extend terminal hour to 4am in December to January provides an opportunity to increase alcohol consumption at a time when more people access licensed premises. This approach is potentially at odds with the Scottish Government's attempt to reduce alcohol harms and whole population consumption. Alcohol harms have increased in the past few years. This is demonstrated by the increased level of alcohol related hospital admissions and alcohol specific deaths.

In addition, extending the terminal hour may also impact on wider public services in terms of hospital admissions and public disorder.”

COMMENTS FROM THE LICENSING TEAM

The majority of responders agreed with the updated festive policy. Apart from the Council none of responders who suggested decreased hours referred to any evidence or specific issues. In relation to the response from the Council it is the case that if a general extension of festive hours is not included in the policy then more licence holders will exercise their right to apply for extended hours. This leads to a significant amount of work for Board staff for no reason as here are very limited powers to refuse applications.

RECOMMENDATION

No change should be made to the updated festive policy.

Question 8 Do you consider that the Board should make any changes to the section of the policy regarding extended hours?

27 responses were received. 81% said no and 19% i.e. 5 responders said yes.

COMMENTS FROM THE LICENSING TEAM

The majority of responders agreed that no changes should be made to the extended hours policy. The Council response indicated that it was opposed to extended hours. However, the law allows for such applications to be made in particular circumstances and the Board has very limited powers to refuse these. None of responders who suggested decreased hours referred to any evidence or specific issues.

RECOMMENDATION

No change should be made to the policy on extended hours.

Question 9 Do you agree with the Board's proposed changes regarding noise?

30 responses were received. 73% agreed with the changes regarding noise. 27% i.e. 8 responders disagreed. Of those who made comments 6 responders were in favour of the changes and 2 of those mentioned issues with noise from licensed premises near their homes. 2 responders were not in favour of the changes, 1 said "There should be some outdoor noise allowed. People who live near a Public house know there will be noise before they move in. Another said "I feel this might restrict chances of music or other noise based events taking place". The Council's response indicated it was in favour of the changes,

COMMENTS FROM THE LICENSING TEAM

The majority of responders agreed with the proposed changes. None of responders who disagreed referred to any evidence or suggested alternative wording.

RECOMMENDATION

The changes to the policy regarding noise should be made.

Question 10 Do you wish to see any other changes made to the Board's policy on preventing public nuisance?

29 responses were received. 69% said they did not want to see other changes relating to preventing public nuisance. 31% i.e. 9 responders disagreed and said they did. The Council's response indicated it did not wish to see any changes made to this part of the policy

Of those who responded to a question asking what changes are considered necessary 3 responders were seeking additional wording.

“Add in wording to make it clear that these noise nuisance measure apply to temporary structures also, including where previously unlicensed areas (not covered by premises licence) hold an Occasional Licence. My reason for this is that Linlithgow Rugby Club, last year, temporarily dressed their indoor training hall as a "marquee", and held events by means for an Occasional Licence, which were creating a noise nuisance well beyond 11pm (for which they were issued with a notice for breach of licence conditions). These conditions should also apply to marquees erected outdoors.”

“And cover more than music - the racket from patrons leaving or smoking is equally disturbing for residents, often alarming if it's aggressive”

“Prevent clubs like the twig in bathgate holding 18th birthday parties the noise is terrible not to mention the mess”

The remaining comments were related to matters not covered by the question.

COMMENTS FROM THE LICENSING TEAM

The majority of responders agreed with the changes to the wording regarding noise nuisance. No complaints about noise or other issues following parties at the Twig have been received.

RECOMMENDATION

In view of the fact that the Board has received complaints about events at the Rugby Club it should consider if it wishes to make any change to the wording.

Question 11 Do you agree with the wording of the revised conditions for occasional licences?

30 responses were received. 83% said they agreed with the wording, 17% i.e. 5 responders disagreed.

Reasons for disagreeing were

- I live next to a property which regularly applies for Occasional Licences so these directly impact me. I agree with the addition of condition 17, but disagree with re-wording of condition 16; -Current wording seems better to me, not the re-wording. It should not only be amplified entertainment noise. Linlithgow Rugby Club have used their training centre for entertainment events using Occasional Licences. Even when things aren't amplified, the noise could still be heard in our home. They held a wrestling event last year - what we assume were "body slams" on the area floor, sounded like claps of thunder from within our home. No noise should not be audible out-with the premises, whether amplified or not. What is meant by "at" any neighbouring property? Does this cover outdoors as well indoors?
- 9pm is early in the summer months.

COMMENTS FROM THE LICENSING TEAM

The majority of responders agreed with the changes to the wording regarding occasional licences. The Council's response indicated it agreed with the changes. In relation to the issues raised about the Rugby Club the Board should consider if applications to licence premises which are of a non-traditional construction should be accompanied by a noise escape plan explaining how noise will be managed at the premises to prevent nuisance to neighbouring properties.

Jim McGinley the council's Planning Services Manager has advised that non-traditional construction can be described as those buildings not built of brick or stone walls with slate or tiled roofs. Non-

traditional construction includes, but is not limited to, buildings which are: modular units, timber framed, metal framed, precast concrete, in-situ concrete or steel frame with either cladding or infill walls.

RECOMMENDATION

In view of the fact that the Board has received complaints about events at the Rugby Club and previously regarding applications for occasional licences for a portacabin it should consider if it wishes to make any change to the wording.

Question 12 Do you wish to see any other changes made to the Board's policy on occasional licences?

29 responses were received. 93% said they did not, 17% i.e. 2 responders disagreed. The Council did not wish to see other changes.

Those who disagreed made the following comments

- Yes, and my reason is because I live next to a premises which has held nuisance events whilst holding an Occasional Licence. Similar to 4.6 for extended hours applications, licences premises should be covering "regular and reoccurring events" under their premises licence and operating plan, rather than applying for occasional licences, year in, year out.
- Outdoor times changed till 10 - 10.30pm

COMMENTS FROM THE LICENSING TEAM

The majority of responders did not wish any other changes.

RECOMMENDATION

It is likely that the above comment about nuisance events relate to the Rugby Club. In view of the fact that the Board has received complaints about events at the Rugby Club it should consider if it wishes to make any changes to the policy as suggested.

13. Do you consider that there is overprovision of licensed premises within particular areas of West Lothian or indeed in the whole of West Lothian?

31 responses were received. 77 said they did not consider there was overprovision, 27% i.e. 72 responders said they thought there was. Responders were asked to email any evidence and refer to it on the form. No evidence was received.

In the response from the Council, it was stated that the Council considers that there is overprovision in the whole of West Lothian. No evidence of this was submitted.

1 responder stated that

Better data is required to map areas where there may be overprovision within West Lothian

COMMENTS FROM THE LICENSING TEAM

Without any evidence of overprovision being submitted the Board cannot consider an overprovision policy.

RECOMMENDATION

Section 3.2 of the policy should be updated to indicate that no evidence of overprovision was received.

Question 14 Do you agree with the change to the Policy regarding deliveries of alcohol?

25 responses were received. 92% said they agreed. 8% i.e. 2 responders said they disagreed. No reasons were provided by those who disagreed.

COMMENTS FROM THE LICENSING TEAM

The majority of responders were happy with the changes.

Question 15 Do you have any concerns about alcohol deliveries in West Lothian?

25 responses were received. 80% said they did not have any concerns. 20% i.e. 5 responders said they did have concerns about alcohol deliveries. Of those responders who had concerns 1 had concerns about the safety of delivery staff and 1 had concerns that anyone could order and stated that there were no controls. 1 stated that Challenge 25 needs to be strictly imposed.

Question 16 If you answered yes to question 15, how do you think that Board policy can address these concerns? Please give reasons for your answer.

- The board could put provisions in place to ensure alcohol licence providers set out the locations where alcohol is delivered to. In doing so, this will allow for a mapping of provision and whether there are aspects of over provision within specific localities within West Lothian.
- Outside of Amazon, the use of Uber eats and taxis for alcohol and cigarettes deliveries is just morally wrong. It's not behaviour we should be enabling by making it easier
- Stop it altogether

COMMENTS FROM THE LICENSING TEAM

The majority of responders did not have any concerns. Challenge 25 is a mandatory condition and any complaints that this is not being complied with would be investigated to ensure that the appropriate procedures are being carried out. No evidence of any breaches of the condition were provided.

In relation to the comments about what the Board policy could do to address their concerns the Board does not have power to do any of the things suggested above without the Government introducing new powers.

RECOMMENDATION

The suggested changes to the policy regarding alcohol deliveries should be made.

Question 17 Are there any particular issues whether arising from dispersal of patrons or otherwise which the revised policy should address in relation to transport?

23 responses were received. 70% of responders said they did not have any particular issues, 30% i.e. 7 responders said they did.

The following comments were received –

- Vehicles idling (taxis, buses, coaches) and sounding horns are an issue outside these premises - what can be done to stop this? Reversing alarms on large vehicles (such as coaches) are a problem, particular when events end late at night and neighbours are trying to sleep. The policy should seek to address these issues.
- Premises which open beyond 11pm should contribute to a West Lothian Night bus network.

- I'm a public transport user - drunk and drugged people on buses are terrifying. They're a danger to the driver, passengers and women. There should be the ability to call police like they have on trains
- Dispersal of patrons at terminal hour for nightclubs and other premises can lead to anti-social behaviour and incidences of crime; and licenced premises require to have a strategy or management plan in place to assist in safe and timely departure of customers. The shortage of and unreliability of some taxi service provision also generates concerns in some town centres.
- No taxis
- There should be more taxis. They seem to have disappeared
- Need more taxis to get loud rude drunk people hons (sic)

COMMENTS FROM THE LICENSING TEAM

The majority of responders did not have any issues about transport. However, given the comments received the Team have contacted the Public Transportation Team to ask about the transport strategy and the specific issues raised at both questions 17 and 18.

Question 18 What improvements could be made to the Board's policy in relation to transport issues? Please give examples.

The following comments were made

- Make location of premises and the transport issues they may bring a consideration for Occasional Licences. Where there are residential homes that would be impacted by these noises, set earlier finishing times
- The availability of public transport could support the objectives of the policy. For example, linking public transport to licensing hours to support people leaving areas where there are premises which serve alcohol
- Night bus network to be sponsored by all venues open beyond 10pm for the area the venue is situated in until a hour beyond closure.
- The availability of public transport could support the objectives of the policy.
- As above
- More taxis

RECOMMENDATION

The Board should consider potential changes to the policy to address transport issues.

Question 19 Do you feel that there are alcohol related issues facing people with protected characteristics differently to people without protected characteristics? Please give examples.

23 responses were received. 87% of responders said they did not have any particular issues, 13% i.e. 3 responders said they did. The following comments were received.

- Males present at services disproportionately compared to females. 3:1
- pregnancy

Question 20 Please tick the box next to any protected characteristic where you think that licensing policy can have a positive impact?

Responses received -

- Age ticked x 8
- Disability ticked once
- Gender reassignment ticked once
- Pregnancy and maternity ticked x 3
- Race ticked once
- Religion or belief ticked once

- Sex(Gender) ticked x 3
- Sexual orientation ticked once
- Marriage/civil partnership ticked x 2

Question 21 How can this be achieved? Please supply any evidence which you would wish the Board to consider.

- Males accessing help for problematic alcohol use is 3:1 males to females. Similarly, it can also benefit younger people within the area.
- Allowing different places the chance to apply for a one off later licence if required.
- Stop underage drinking

Question 22 Please tick the box next to any protected characteristic where you think that licensing policy can have a negative impact?

Responses –

- Age ticked once
- Disability ticked once
- Gender ticked once

Question 23 How can the policy be changed to counter any negative impacts?

If applicable please suggest any changes which you consider are necessary and give reasons for your answer. Guidance suggests that statements of policy should provide clear indications of how Boards will take into account other matters relating to alcohol, for example: local crime prevention; community safety strategies, health, planning, tourism, cultural strategies and any other plans introduced for the management of town centres and the night time economy.

3 responses received

- Young people having to vacate by 9pm. Don't agree. However don't think the young people should be allowed to run riot and parent getting pie eyed.
- Where women are hurt or made unsafe in premises, licenses should be suspended under they detail how they will improve this
- It should be made a mandatory requirement (or condition) for all licensed premises in a town to be fully active members of their respective local Pubwatch organisation. This structure and organisation requires to be fully supported and facilitated by Police Scotland, with support from local licensees and other associated partners in the night time economy.

COMMENTS FROM THE LICENSING TEAM

The issue of children and young person's access was already considered at question 4. Licences can only be suspended where it is proved following a review that the licence holder or their staff did not act appropriately when violent incidents occur within the premises. The Board does not have power to make Pubwatch membership mandatory. Even if it did there would need to be specific new powers introduced for this to make a difference. No other practical changes were suggested on the basis of equality issues.

Question 24 Are there any particular issues in relation to the above matters?

14 responses were received. 93% of responders said they did not have any particular issues, 7% i.e. 1 responder said they did. No understandable comment was received.

RECOMMENDATION

No additional changes to the policy are required as a result of the responses to the equality questions.

25. What suggestions do you have to amend the Board's policy to assist tourism? Please detail your suggestions and give reasons for your answer.

- If a family are on holiday they must leave building by 9pm. This doesn't happen abroad.
- Ensure late night accessible coordinated affordable transport.

RECOMMENDATION

As these issues have already been raised no additional changes to the policy are suggested to assist tourism.

26. If you have any other suggested changes to the Board's policy please indicate these and give reasons for your answer.

- Yes - page 57 currently includes "For applications to licence open air events and temporary structures the Board recommends that applications are lodged at least 4 months prior to the event in case they need to be referred to the board for determination (see below)." Is a marquee considered a temporary structure? Would Linlithgow Rugby Club repurposing their Indoor Training Centre as an "indoor marquee" be classed as a temporary structure, albeit it, housed within an existing building structure (which is not covered by their premises licence, nor designed to contain noise, so to all intents and purposes, is open air)? Could the policy clarify what is and is not a temporary structure? Presently it feels like there there could be a gap here
- The Scottish Grocers' Federation (SGF) is the trade association for the Scottish Convenience Store Sector. There are 5,098 convenience stores in Scotland, which includes all the major symbol groups, co-op and convenience multiples in Scotland. SGF promotes responsible community retailing and works with key stakeholders to encourage a greater understanding of the contribution convenience retailers make to Scotland's communities. In total, convenience stores provide over 49,000 jobs in Scotland. Modern local convenience stores are community assets, from offering busy families a top-up shop facility on the one hand, to helping patrons (particularly vulnerable people) manage their weekly household budgets during the cost-of-living crisis and providing an essential alternative to larger or out of town supermarkets. Many people rely on their local convenience store with the average shopper visiting their local store 2.7 times per week and with 57% of customers choosing to walk as a mode of travel to stores. During the Covid pandemic in particular, local shops were on the front line, providing essential services for many vulnerable people and communities. Local shopping has, over the years, often been replaced by large destination retail parks, gone from many areas are the local butcher, baker and grocers. The personal interaction with your local retailer is now almost uniquely reserved for your local convenience store. Many convenience retail businesses are operating in an extremely challenging trading environment, however, and the Scottish Government has acknowledged that continuing to add to the legislative burden could put businesses at risk. In addition to meeting the requirements of new regulations, such as Minimum Unit Pricing; potential restrictions to the promotion of alcohol products and foods high in fat, sugar & salt; and Scotland's Deposit Return Scheme, the sector as a whole is among the hardest hit by issues such as food inflation, cost-of-living and rising energy costs. The cumulative cost burden of legislation on top of the pressure of these other factors are significantly adding to vulnerability of many businesses. Being able to offer a diverse range is of paramount importance. Modern convenience stores now offer a wide range of products and services, from deli counters

and coffee to collection lockers. A more restrictive range simply provides the potential customer with a reason to shop at a competitor. Whilst it is ancillary to wider ranges of grocery and retail, alcohol is an important sales category for our member's stores. A typical convenience store offers a range of at least 17 kinds of different product categories. Alcohol accounts for 18.1 % of total sales turnover. 76% of convenience stores have an alcohol licence. SGF welcomes the opportunity to contribute to the consultation exercise. We trust that you will find our comments helpful. Our comments relate primarily to Management of Premises, Licensed Hours and Overprovision.

- Harder penalties for people who don't follow the rules.
- Please make it easier for community groups to run occasional events involving alcohol. Community spirit in our area is almost non-existent. The bureaucracy and cost of running events involving entertainment or alcohol make them almost unviable to run.

COMMENTS FROM THE LICENSING TEAM

The comments about the Rugby Club have already been considered.

The comments from the SGF are just background information and the Board cannot do anything about the other suggestions without legislative changes.

RECOMMENDATION

No additional changes to the policy are required as a result of the responses to this final question.

Audrey Watson
Managing Solicitor – Licensing Team

1 August 2023