

**Appendix 5: Consultation response analysis**  
**West Lancashire Borough Council**  
**Licensing Act 2003 - draft Statement of Licensing Policy 2015**

**Consultation representation analysis : consultation period 01/08/14 - 31/10/14**

Ref No.	Date	Respondent	Para	Comment	Appraisal	Response
1.14	07/08/2014	WLBC Legal Services	4.7	Need to differentiate between standard conditions and standard wording used as needed for consistency of approach.	Amended warranted to adequately describe the use of standard wording.	Additional sentence inserted into para 4.7.
			4.20	Need to mention disabled access / toilets etc.?	Many safety or access requirements are addressed in other legislation. It is not for the policy to replicate these requirements. This also ensures the policy does not conflict with other legislative requirements.	No amendment made.
			4.26	The cumulative impact of licensed premises in an area and scope for mitigation (section 15). Should this be migration rather than mitigation?	The use of the word mitigation is correct. If a cumulative impact area were to be declared in the future, any application that was submitted within that area would be treated on its merits, but would have to offer mitigation as to why the application should be granted.	Para 4.26 amended to clarify this point.
			6.8	Need to clarify differing requirements in the regulations or guidance	Amended warranted.	Para 6.8 amended.

7.7	Not said we have the power to make a representation anonymous if they could convince the authority that there would be intimidation or threats etc. and also the Police could only make those representations if they have the evidence themselves, so if the person had not reported it to the Police they can't really ask them to make the representation on their behalf.	Paras 7.2 - 7.15 address this issue as stated in paras 9.22 - 9.26 of S182 Guidance. However, clarification and a statement offering a safeguard where serious concerns are evident is required.	Para 7.7 amended to clarify role of responsible authority in such cases. Additional sentences added to para 7.7 to demonstrate the safeguards in place where evidence of intimidation or threat of intimidation is provided.
7.9	May ask for a representation to be re-worded if we thought it was possibly libellous or refuse to publish it if it was.	Amended warranted to explain the approach to potentially libellous representations.	Additional sentences inserted into para 7.9.
7.17	Need to clarify that the licensing principles are distinct from the licensing objectives.	Amended warranted to clarify the difference between discretionary licensing principles and the statutory licensing objectives	Additional sentence inserted into para 7.17.
11.6	States 'will be given' guidance at 9.35 says 'should be given'	Amendment warranted.	Para 11.6 amended to reflect the S812 guidance.
12.12	States ' first review hearing' but may not be.	Amendment warranted.	Para 12.12 and 12.14 amended.
12.14	Need to state that the committee will stipulate how long the yellow card will remain in force	Amendment warranted.	Para 12.14 amended,
12.16	Wording needs to be changed to presumption to revoke to avoid challenge	Amendment warranted.	Para 12.16 amended.
12.18	Is there a need to clarify that prosecution may be considered where premises remain open whilst suspended.	Amendment warranted.	Additional sentence inserted into Para 12.18.
13.2 / 13.3	Wording needs to be changed to reflect the regulations and not provide overly burdensome time constraints	Amendment warranted.	Para 13.2 and 13.3 amended.

2.14	07/08/2014	WLBC Planning Services	5.3	Amendment required to better define the role of the planning process.	Amendment warranted.	Para 5.3 amended.
			5.5	Para is misleading and lacks clarity. - Advice provide on planning requirements.	Amendment warranted.	Para 5.5 amended using guidance provided.
			15.1	2nd sentence is incorrect and should be removed.	Amendment warranted.	Para 15.1 amended.
3.14	15/08/2014	WLBC - Technical Services	1.6	Start of 3rd sentence - would "measures" or "procedures" be preferable to "steps"	Amendment warranted.	Para 1.6 amended.
			4.12	2nd sentence - insert "they" between "and disorder and" and "should therefore".	Amendment warranted.	Para 4.12 amended.
			7.10	2nd sentence - "authority to address the authority" - would "permission" be better?	Amendment warranted.	para 7.10 amended.
4.14	18/08/2014	Rosie Cooper MP	7.7	Expressed concern that anon representations cannot be made. May deter the public from making representations who fear repercussions.	See 1.14	See 1.14.
5.14	09/09/2014	WLBC - Environmental Protection (verbal comment)	15.11	Clarify closure powers under ASB Crime and Policing Act 2014.	Amendment warranted.	New sentence added to para 15.11.

6.14	24/10/2014	Lancashire Constabulary - Licensing Sergeant	4.13 / 4.28	<p>Proposed amendment: removal of the word "normally" from some of the text and in particular at section 4.13 under Crime and Disorder and section 4.28 under the Prevention of Public Nuisance.</p> <p>It is felt that the use of the word "normally" can make the council's position slightly weaker with regards dealing with representations from the police and the removal of this word would strengthen the document without changing the context of the sentence. This may be seen as the Council being inflexible however the final few lines of the section which allows the council to move away from this position if the applicant has sufficiently demonstrated compelling reasons why it should be granted does provide that flexibility.</p> <p>It is noted the same wording appears under the sections dedicated to the Public Safety and Protection of Children from Harm objectives and although the police as a responsible authority have not been mentioned in these sections, the same consideration should be given.</p>	<p>The removal of the word "normally" does not jeopardise the position of the Council, particularly given the latter part of the sentence. Similar wording is used throughout section 4 and requires similar amendment.</p>	Paras 4.13, 4.18, 4.28, 4.33 amended.
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7.14	27/10/2014	2 Residents - Parbold area	1.4	<p>This draft document in our opinion is a very clear, precise and easily understood consultation paper. In particular and taking into account possibly less number of staff to monitor licensed premises</p> <ul style="list-style-type: none"><li>• There needs to be more proactive involvement from the Licensing Authority, Environmental Health Department and the police to deal with issues such as anti social behaviour, noise and other nuisance.</li><li>• It is all very well encouraging self regulation by licensees and managers but they must understand that non compliance will not be tolerated.</li></ul>	Noted. Detail of liaison arrangements is given in section 14.0.	No amendment made.
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1.6	<p>Totally agree that steps should be in place to appropriately address the individual risks at each premises. Likewise when conditions have been placed on a license for example, no noise should be heard outside the boundary of the property, windows and doors should be closed regardless of what entertainment is being held i.e. live entertainment, recorded entertainment or televisions on the car park etc. The licence conditions should be strictly adhered to by the manager/licensee of the premises. It should be borne in mind that residents have a right to enjoy their property /gardens without feeling that they are living in a city centre. The licensing authority should also bear in mind the impact on the residents, who have a right to have a decent night sleep whether they are going out to work or retired etc.</p>	<p>Noted. These factors are detailed in section 4.0.</p>	<p>No amendment made.</p>
1.7	<p>If the premises operator has to do what appears to be a risk assessment relating to activities on their premises does the licensing authority receive a copy? This should also if it is not already be available for public scrutiny.</p>	<p>Noted. This section does not convey a requirement to conduct a specific risk assessment, rather than applicants should address the risk posed by their business. Where such processes are documented and accompany an application, this are available to the public.</p>	<p>No amendment made.</p>
1.8	<p>Not sure if this is a recommendation or if it is in force now but the only consultation that we are aware of is when boards appear outside the premises advertising any event etc. they are putting on.</p>	<p>Noted. This section outlines what the authority expects of applicants to ensure licensed operations are aware of the potential impact on, and benefit to, the community.</p>	<p>No amendment made.</p>

1.9	The authority has given a list of recommendations which if scrupulously carried out should alleviate some concerns if not all.	Noted.	No amendment made.
1.10	Since the smoking ban walk past most public houses and see for yourselves the litter that is left on the pavements outside.	Noted. Detail of liaison arrangements is given in section 14.0.	No amendment made.
1.11	Managers/licensees should also be aware that the car parks/beer gardens are part of the licensed premises and as such they should control these areas as much as they should be controlling activities inside the building.	Noted. These examples are addressed.	Para 1.11 amended for added emphasis.
1.12	Applying for a variety of authorisations under the act this should be more prominently displayed i.e. as in planning applications on lamp posts, not a little piece of paper in the premises window, and residents in close proximity should also be consulted.	Noted. The requirements for the display of notices on premises detailing the application are prescribed in regulations and cannot be changed locally,	No amendment made.

			<p>4.15 This paragraph details the responsibilities of the manager/licensee. In particular we would like to point out the sentence regarding the prevention of sales of alcohol to those who are drunk or passing alcohol to those who are drunk. We have been told on numerous occasions by the police that it is a criminal offence to serve alcohol to anyone who is drunk and yet we have personally witnessed this taking place. It needs to be vigorously reinforced to licensees/managers that action will be taken if the law is ignored in this way. This would help to control noise nuisance, anti social behaviour of any kind e.g. vomiting in the street, urinating and generally causing a nuisance to people who just want to go out and enjoy themselves responsibly.</p>	<p>Noted. Action is taken against premises where evidence of such activity is available and resources allow. Detail of liaison arrangements is given in section 14.0.</p>	<p>No amendment made.</p>
			<p>4.22 to 4.39 If the recommendations in this chapter are adopted and strictly adhered to it would give peace of mind to the residents of the area. It should allow the manager/licensee to run a responsible business and in the long run establish a good reputation for the licensed premises. Which would be in everybody's best interest.</p>	<p>Noted.</p>	<p>No amendment made.</p>

8.14	28/10/2014	Clerk to Lathom South Parish Council	7.7	The document was welcomed but there is concern that any residents complaining or objecting to a licence application, have to provide their contact details, which could be off-putting and put residents in an awkward position. It was resolved also to request that parish councils are notified of any application in the parish area.	See 1.14. Notifications of applications are submitted in the local press and displayed on the premises. There is no requirement to provide data to parish councils and may be seen as trying to attract representations.	See 1.14.
9.14	29/10/2014	Director of Public Health - Lancashire County Council	4.5	Need for explicit reference to mandatory conditions.	Amendment warranted.	Para 4.5 amended.
			4.13, 4.18, 4.28 and 4.33	Need to consider that equal regard should be given the representations from all responsible authorities.	Amendment warranted. Representations from Responsible Authorities are considered equally, but the recognition that particular responsible authorities have expertise relating to specific licensing objectives.	Paras 4.13, 4.18, 4.28, 4.33 amended.
			4.20	Need to state that free drinking water is available.	Amendment warranted.	Para 4.20 amended.
			4.36	Need to recognise risk of child sexual exploitation is licensed premises.	Amendment warranted.	Para 4.36 amended.
			5.10	Need to consider reports from Director of Public Health and local health and wellbeing intelligence as influence of licensing strategy.	Noted.	No amendment made.

			12.10	need for potential voluntary agreements when not under threat of review.	Noted. Already used as good practice.	No amendment made.
10.14	30/10/2014	Cllr A Owens	1.9	The recommendation to operators to include local residents in consultations is to be welcomed. However, there appears to be no guidance as to how that consultation should take place. It is not clear if this is in relation to new applications; revised applications or both. Neither is it clear what weight will be given by the licensing authority to the presence or absence of such consultation when determining the application.	Amendment warranted. Whilst it is for operators to determine the nature of consultation, the paragraph needs amendment to reflect that these statement refer to existing licensed premises as well as all relevant applications. Only due regard can be given to such approaches - depending on frequency and nature.	Para 1.9 amended.
			2.3	Refers to denser residential accommodation. This is poorly worded. Noise control measures on premises may be required even where there are few residential properties especially if a statutory noise nuisance is evidenced. Paragraph 2.19 of the statutory guidance makes this clear.	Amendment warranted. Section 4.0. and specifically para 4.23 makes this reference to para 2.19 of the guidance. Simple reference to the public nuisance section of the policy is required.	Para 2.3 amended.

4.6	<p>This paragraph contains significant discussion of the word “vicinity” in relation to licensing law. In relation to establishing “vicinity” it is necessary firstly to have clarity over the boundaries of the “premises” and “places”. My experience has been that applications are often submitted with unclear or substandard site plans especially with regard to outdoor areas which can increase the likelihood of nuisance.</p> <p>It should be a requirement of the Authority’s Licensing Policy that license applications must be submitted with a clear plan which showing the boundaries of the “premises” and “places” in order that a more informed view of the vicinity of the “premises” and “places” can be made in determining the application. Indeed the current final sentence makes clear that disputes about this matter are often for courts to determine and therefore a clear site plan showing boundaries of the licensable area should be required and this requirement written into the policy if only to reinforce the legal position. Statutory guidance states: plans must be “clear and legible in all material respects”.</p>	<p>Noted. Issues have been raised where the impact of licensable activities has caused problems to public nuisance, rather than the conduct of a licensable activity - e.g. the use of beer gardens where no alcohol is sold, but it is consumed. Although this issue is addressed further in Section 4.0, an amendment is warranted to clarify this point.</p>	<p>Para 4.6 amended.</p>
4.22 - 4.31	<p>The wording of this section is largely welcomed as an improvement on the current policy, especially the mention of nuisance to residents sleep within vicinity of premises (4.23) and mention of pedestrian routes to and from premises (4.26).</p>	<p>Noted.</p>	<p>No amendment made.</p>

4.30	Mentions a requirement, where appropriate, for door staff to monitor noise beyond the vicinity of premises and ban clients who regularly leave in a noisy manner. Presumably this would be enacted via a condition on any licence granted. Detail on how any such condition would be monitored by the Authority would be welcomed.	Noted. The enforcement of any condition is addressed in section 14.0	No amendment made.
6.5	Does not provide sufficient detail about the criteria used to determine if a representation is relevant. While it is welcomed that the Assistant Director Community Services must give reasons in writing for his decision on the relevance or otherwise of a representation the guidance to the Act states at paragraph 9.9 that "in borderline cases, the benefit of the doubt about any aspect of a representation should be given to the person making that representation. The subsequent hearing would then provide an opportunity for the person or body making the representation to amplify and clarify it." Recognition of the intention of the guidance within this section of the policy would be welcomed.	Noted. Para 6.5 is not intended to provide this level of detail. Paras 7.11 - 7.15 provide more information on the content and nature of representations	Para 7.12 amended.
8.11	Makes mention of public conveniences open late at night. This mention is to be welcome as acts of urination in public are frequently reported locally.	Noted.	No amendment made.

15	<p>Discusses Cumulative Impact and in particular paragraph 15.9 references Ormskirk Town Centre. I have concerns that this measure is misdirected.</p> <p>The data clearly shows that the nuisance and anti-social behaviour that cannot be directly ascribed to specific premises is disproportionately focused after midnight and especially between 0200 and 0300 hours. A Cumulative Impact Policy could be a very blunt tool which might prevent premises such as a beauty salon offering a complimentary glass of wine to their customers from being granted a licence. While a Cumulative Impact Policy can include exceptions, it is almost impossible to write such exemptions to anticipate all eventualities. Premises which have a different offering in Ormskirk perhaps similar to the Hop Inn Bier Shoppe might be prevented from opening by such a policy. Such a policy also stifles competition and could perversely therefore lead to worsening practices from existing premises.</p>	<p>Noted. These issues will be addressed in the assessment of cumulative impact at a later date. 15.10 also provides current alternative options. For clarity, para 15.8 states that there is no cumulative impact policy in place at this time.</p>	<p>Para 15.8 amended.</p>
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				<p>Similarly, such a policy will do nothing to reduce the current significant anti-social behaviour and nuisance after midnight and especially between 0200 and 0300 hours. In this regard a Late Night Levy would be more focused on the issues Ormskirk faces. It would provide some additional resource to deal with the negative impact to the public purse from licensed premises operating after midnight and there are a number of towns and cities where it has had a positive impact.</p> <p>I would recommend that the policy includes a reference to a Late Night Levy also being investigated in 2015/16.</p>		
11.14	30/10/2014	Ormskirk Residents Group	7.10	<p>Fully understand the need for any representation not be anonymous, but feel it would be sufficient for the chair and /or secretary of a residents group to make a representation on the group's behalf if such a representation was agreed at a minuted meeting of the group and those minutes are submitted with the representation (the minutes will details the attendees)</p>	<p>Noted. If representations were submitted in this manner, all those making the representation would be detailed and it would comply with the requirement of para 7.10.</p>	No amendment made.
			1.9	<p>Last bullet point refers to licensed premises being continually monitored. We would like specific detail as to how this monitoring is carried out and documented.</p>	<p>Noted. Enforcement arrangements are detailed in Section 14.0. Monitoring carried out by the MALT and the minutes documented. Therefore, reference to Section 14.0 should be added.</p>	Para 1.9 amended.

1.14	Will the issues log be open to inspection.	Noted. The issues log is a record of administrative or policy matters that need to be considered in subsequent versions, or may trigger the review of current policy. The document is not open for public record, but concerns regarding the policy can be made to the licensing service.	Para 1.14 amended.
2.3	Requesting rewording of this paragraph - adding "control in/or affecting" and removing the word "denser".	See ref no 10.14. Simple reference to the public nuisance section of the policy is required.	Para 2.3 amended.
4.6 & 4.7	Need for boundaries on site plans to be measurable especially with regard to outside area.	See ref no 10.14. Issues have been raised where the impact of licensable activities has caused problems to public nuisance, rather than the conduct of a licensable activity - e.g. the use of beer gardens where no alcohol is sold, but it is consumed. Although this issue is addressed further in Section 4.0, an amendment is warranted to clarify this point	Para 4.6 amended.
4.23 - 4.26	We would welcome any measures to monitor officially noise nuisance on an unannounced, occasional or ad hoc basis visit and feel that this could be added to this section.	Noted. Enforcement arrangements are detailed in Section 14.0. Para 4.28 already refers to environmental protection as being competent on noise nuisance matters. Monitoring arrangements are arranged and conducted by this service and is therefore not a matter for the policy. Although environmental protection are represented at the MALT and the results of any monitoring will be disclosed at these meetings.	No amendment made.
4.30	Request that a log be kept of any instances that have occurred in relation to any of the bullet points, this log is to be regularly inspected by the authority and measures for the authority to monitor unannounced occasionally.	Noted. Measures in para 4.30 are indicative, not prescriptive. Conditions may require such a log, but the legislation does not.	No amendment made.

6.5	Request the term 'relevant' is given more explanation and the opportunity for ant representation dismissed on the grounds of irrelevance to have the opportunity for independent scrutiny.	Noted. S 182 guidance already defines relevant as having regard to 1 or more of the licensing objectives, therefore no need for duplication in the policy. Complaints about dismissal of representations would be addressed as a complaint against service and handled in line with corporate procedures.	No amendment made.
8.11	Any such measure will only be effective if there is sufficient monitoring of identifiable hot spots on a regular basis. The role of the community is important here as we are the resident living 24/7 in amongst regular problems. We would welcome the opportunity to contribute to a community log via a designated phone number, on which instances of late night drink related anti social behaviour are recorded. The purpose of this would be to build up a picture of times/dates/locations for immediate and future response.	Noted. Existing mechanisms already exist to submit such complaints / issues. However, not all of these will be relevant to the licensing act or licensed operations. Where such complaints are made and are relevant to licensed operations, these are brought to the MALT.	No amendment made.
14	Are the minutes of the MALT available and can this be added to the text.	Noted. Many items discussed at the MALT are confidential and so the minutes are not publically available.	No amendment made.
15	we feel cumulative impact needs to be explored in detail in order to bring out the numbers of licensed premises as a percentage of the total town centre premises, which many resident feel is too high and is detracting from the character of the town, which the local authority is aiming to promote for its heritage and shops/market.	Noted. These issues will be addressed in the assessment of cumulative impact at a later date. 15.10 also provides current alternative options. For clarity, para 15.8 states that there is no cumulative impact policy in place at this time.	Para 15.8 amended.

12.14	30/10/2014	resident - Wrightington	1.8	licensees are advised to regularly consult with local communities. Views expressed that his is not happening in practice.	Noted. Enforcement arrangements are detailed in Section 14.0.	No amendment made.
			1.9	Is monitoring on the basis of complaints or checks by police / licensing. The latter being preferred.	Noted. Enforcement arrangements are detailed in Section 14.0. Monitoring carried out by the MALT and the minutes documented. Therefore, reference to Section 14.0 should be added.	Para 1.9 amended.
			4.15	Importance of the DPS particularly where the licence holder doesn't live at the premises. Questions raised regarding the current licensing qualification to hold a personal licence. Also drinking outside should be discouraged and suitable provision provided for smokers	The standard of training is dictated by legislation and cannot be changed locally, furthermore the personal licence is currently subject to additional deregulation. Use of external areas is addressed through section 4.	No amendment made.
			4.20	Presence of someone on the door after 10:00pm is essential to minimise noise and disturbance. This is disregarded by some licensees resulting in complaints.	The provision of door supervisors is not a mandatory condition. It can be offered by the applicant or through a condition put on following a hearing.	No amendment made.

4.24	Public nuisance a very important issues particularly in rural areas - affects quality of life and property values. This paragraph covers every aspect of the problem and is very important. Issues: patrons and taxis to use the car park, late night license are not appropriate to semi rural areas, does the demographic match the business and allow it grow, use of social media to attract business, noise monitoring conducted by env protection is affected by the construction of the dwelling. Therefore noise must be dealt with a source. Closure of doors and windows, vestibules at exit doors, sound levels determine by env protection. public transport issues.	Noted. Issues of demography can be relevant to the licensing objectives and this section recognises this. Noise controls are addressed throughout this section and where required, conditions are placed on licenses forcing them to introduce noise control measures or to restrict hours. Issues pertaining to the advertising or marketing are not matters for the licensing policy.	No amendment made.
4.30	extremely important if adhered to and would reduce any problems.	Noted.	No amendment made.
4.31	Very important - but must be used where further complaints are received.	Noted.	No amendment made.

8.3	Very important - particularly minor structural alterations.	Noted.	No amendment made.
8.7	A business plan must be appropriate and take into account the demographic of the local area	Noted. This section addresses this issue, but the Authority cannot require a business plan to be completed..	No amendment made.
8.12	Important and should be considered very carefully. Consideration and compliance with all these factors would help In resolving or significantly reducing the problems arising form noise and nuisance created by poorly managed or maintain premises.	Noted	No amendment made.
14	Reliance should not be on complaints random system of monitoring and enforcement is required.	Noted. Enforcement arrangements are detailed in Section 14.0. Routine visits are conducted, but complaints are still a vital source of intelligence about the conduct of licensed premises and often can lead to further action.	No amendment made.

13.14	31/10/2014	resident - Wrightington	general	<p>Document is fairly 'woolly' and it does not deliver a fluid and clear approach/ rulings/ procedures for any party. It is laced with caveats. I am alarmed at how open it is to interpretation, clearly there is always an element of this but the document has a high level of this. There should be a process that's followed with strict consequences all of which are documented and made clear, currently this is one of the issues I have with the way you monitor licensing behaviour and the document does nothing to address this.</p>	<p>Noted. the Policy is not intended to be a procedural document. The available statutory Guidance discourages such a fixed procedural approach to licensing policies, as it is a key aspect of the Licensing Act that each case is considered on its merits. Accordingly, the Policy cannot directly address every eventuality that may occur in licensed operations, and therefore is broadly similar in its approach to many other policies in operation across the country. This Policy does differ from previous versions is the introduction of several 'licensing principles'. These are matters which can be taken into account once the Authority's discretion has been engaged (i.e. where legislation does not dictate) in determining any given matter. These matters are stated in Sections 8.0, 9.0 and 10.0.</p> <p>The Licensing Principles are discretionary and are distinct from the statutory Licensing Objectives contained in the Licensing Act. If applicants do not address the principles, it is more likely that representations will be attracted and the matter brought to the Committee, which may then either refuse the application or impose conditions. On appeal, the Court is also obliged to have regard to the Policy and can only depart from it if it has good reason.</p>	No amendment made.
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			4.24	Very woolly, what does it mean specifically. Per my point above, this isn't conducted now so how will this change once the policy is in place, there are no specifics/ parameters around this	There are clear procedures and sanctions in the Licensing Act (including relevant Regulations and statutory Guidance), so the Policy does not need to replicate this information. The Council and Responsible Authorities do take action to address problems where suitable evidence exists and the legislation permits - i.e. deregulation of the Licensing Act . Each Responsible Authority under the Act has its own duties with regard to monitoring licensed premises and responding to complaints. Section 14.0 details enforcement through the MALT, Licensing inspections / proactive enforcement visits and response to complaints: Depending on the nature of the complaint, Licensing Officers may involve other agencies. The action taken following a complaint can be informal, but can and does lead to formal action.	No amendment made.
			12.12	Again this isn't worth the paper it's written on.		No amendment made.
			General	Specific complaints made about individual licensed premises		No amendment made.
<b>Miscellaneous amendments</b>						
		Licensing Service	Various	Inconsequential typos.	N/A	N/A
		Licensing Service	Various	Consistent use of the wording "Licensing Committee".	N/A	N/A
		Licensing Service	App 2	Crime statistics have been reviewed in the formulation of the policy, but the presentation of such data in the policy quickly appears out of date and loses relevance.	Link to Safer Lancashire website in the policy will ensure link to current up to date statistics.	Appendix 2 deleted. Reference to Safer Lancashire inserted at para 4.11.

