

11 December 2013

Ian Jenkins
Entertainment Licensing LRO Consultation Co-ordinator
Department for Culture Media and Sport
100 Parliament Street
London
SW1A 2BQ

Dear Sirs

Consultation on a proposal to use a Legislative Reform Order to make changes to entertainment licensing

Action with Communities in Rural England (ACRE) is the national charity supporting rural community action through its founder members, the Rural Community Councils (RCCs). The 38 RCCs are independent local development agencies, based at County level, addressing social, economic and environmental challenges in rural areas. Their community development approach within rural communities helps tackle a wide range of local issues which include affordable housing, transport and community planning as well as community buildings.

ACRE co-ordinates the national village hall advice service that is delivered through the RCCs. The following organisations specifically contacted ACRE in relation to this response:

Markyate Parish Council
Memorial Hall, Welham Green
Byfield Village Hall
Wheathampstead Parish Council
Gloucestershire Rural Community Council
Action with Communities in Rural Sussex
Stanwick Village Hall
Rural Action Derbyshire
Community Action Hampshire
Sutton Upon Derwent Village Hall
Fulford Village Hall
Middleham Town Council
Two other hall committees responded but didn't identify their location



Community Matters have asked us to comment that their members equally support the deregulation proposals.

The general view is that the proposals are welcomed and we ask you to note:

- Hall committees and communities organising activities that were previously regulated will no longer need to apply for a Temporary Event Notice reducing administrative and financial burdens. The costs associated with varying a Premises Licence will also be removed. It is considered that the deregulation will encourage community activity. There will, of course, still be costs associated with a TEN or Premises Licence for the supply of alcohol.
- We are pleased that it is recognised that some village halls (5%)ⁱ are owned and managed by Parish Councils.
- The deregulation proposals should be the same across the board. Although there is sympathy with the Government view that local authorities have a greater element of democratic accountability trustees of village halls are accountable under charity law and have to comply with the same regulations.
- The raising of the limit to 500 is useful although many rural village halls and parish council halls have a lower capacity. Community centres in urban areas may have larger capacity and benefit from the 500 limit where the previous 200 was not enough.
- Many village halls already have a Premises Licenceⁱⁱ for the supply of alcohol. Committees were encouraged to include all regulated entertainment when they applied for their Premises Licence as there was no fee. Some clarity is needed on the action halls will be expected to take, if any, to remove regulated entertainment from the Licence. Will there be cost implications for updating/varying the licence?
- There were two comments that 23:00 was too early to finish events and 11:30 and 11:59 were suggested. However, we understand that as it is the regulated entertainment activity that has to finish at the cut off times not the event or gathering the limits should not impose too many difficulties.

The current ACRE hire agreement requires the hall management committee to state all the entertainment activities for which it is licensed and requires the hirer to state the purpose of the hiring. Due to the varying requirements for differently owned and managed buildings hall management committees need to be sure they understand the nature of the exemptions that apply to their building but equally hirers will have to be aware of the differences when using different types of buildings.

ACRE has welcomed the opportunity to comment on the deregulation processes that have taken place recently. All the changes, both those regarding entertainment and alcohol licensing under the Home Office, have resulted in a need for comprehensive guidance which we hope will be addressed in due course.

Yours sincerely

Deborah Clarke
Rural Community Buildings Officer

ⁱ National Village Hall Survey 'The state and management of rural community buildings' 2009-2011

ⁱⁱ National Village Hall Survey 'Rural Community Buildings, Arts, Sports and Licensing Requirements' 2009-2011