

◆ EDINBURGH ◆

LICENSING BOARD

NOTICE OF MEETING

FRIDAY 10th FEBRUARY 2023

9.30am – 12:30pm Meeting will be held via Teams

AGENDA

NOTE: the Board meeting will be webcast - [Licensing Board \(Additional Meeting\) - Friday 10 February 2023, 9:30am - City of Edinburgh Council Webcasts \(public-i.tv\)](#)

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| 0930 | 1. Welcome and Introduction (Convenor) Purpose/scope of the meeting Summarising the consultation process to date and the role of this meeting within the stages of the consultation |
| 0940 | 2. Consultation process (Clerk) Reminder of our responsibilities regarding the consultation and requirements for the new policy and overprovision statement. Summarising the scale and content of the overall response received. Reference will be made to the requirements of the consultation process as set out in Section 6 and Section 7 of the 2005 Act and recently updated statutory guidance (and in particular Chapter 4 – Statements of Licensing Policy and Chapter 5 - Overprovision). |
| 0950 | 3. Response review Detailed consideration of responses received for each of the priority topics. Identify emerging patterns/themes comments submitted under each key topic in the context of the existing licensing objectives. The responses to the consultation will be published online, with personal details redacted. |
| 0950 | a. Licensing hours of operation |
| 1010 | b. Extension of licensed hours |
| 1030 | c. Children and young persons' access |
| 1050 | d. Temporary licensing – use of occasional licences |
| 1110 | e. Overprovision |
| 1130 | f. Other emerging themes. |
| 1200 | 4. Discussion on next steps To enable expansion of responses to consultation topics and other emerging themes: <ul style="list-style-type: none">– further evidence required– topics for hearings/workshops– proposal for hearings/workshops schedule |
| 1220 | 5. Report to the Licensing Board Confirmation of actions to be formally reported at future Board meeting and any other matters arising. |

Nick Smith
Clerk of the Licensing Board

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LICENSING BOARD

Licensing Board membership:

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|----------------------------------|---------------------------------------|
| Councillor Chas Booth | Councillor Margaret Graham |
| Councillor Lezley Marion Cameron | Councillor David Key |
| Councillor Pauline Flannery | Councillor Jason Rust (Vice-Convener) |
| Councillor Catherine Fullerton | Councillor Norman Work |
| | Councillor Louise Young (Convener) |

General information about the Licensing Board's meeting dates, Policies, etc is available online:-

<https://www.edinburgh.gov.uk/licences-permits/edinburghs-licensing-board/1>

LICENSING BOARD CONSULTATION – CHILDREN AND YOUNG PERSONS’ ACCESS

| Are you responding as an individual or as an organisation? (Name of organisation) | What works well with the children and young persons access to on sales licensed premises? | What could be improved upon? | What else would you like to see included under this section in the updated policy? |
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| Organisation GRASS (Grassmarket Residents' Association) | It encourages family friendly behaviour and environments. Publicans have already taken action to ban stag and hens and excessive drinking by groups of young people but a few pubs still see it as their mission in life eg the Seven Sisters in the Cowgate to pour as much drink as possible down the throats of young people in as short a space of time as possible. Several young women were found violently ill or unconscious in the afternoon during the 2022 Festival period. | Nothing other than encouraging responsible behaviour especially among those holding liquor licences. | |
| Individual | Children being permitted in certain places IE food establishments where alcohol is served | But to witness outdoor bars in primary residential areas where they create disturbances for residents is unethical and unprofessional and UNACCEPTABLE Children should not witness adults or young people shouting out Under any circumstances other than for safety reasons Children should be protected from harmful effects of bar activity | 11pm and 1am Children and young people Actually if the culture was altered to strictly 11pm There would be opportunity for a different way of life Start early and finish early Less impact on society as a whole |
| Individual | Early cut off | Earlier cut off | Shorter cut off time |
| Individual | Children should not be allowed where there is alcohol. We need future generations to realise there is more to life. | Cover alcohol in shop shelves like cigarettes. Stop restaurants selling alcohol. | Better education for children on the effects of alcohol. |
| Individual | I have never thought that mixing children with adults in licenced premises is a good idea. They can be exposed to language and behaviour that we really would not want them to experience. | Not having children in licenced premises. | |

LICENSING BOARD CONSULTATION – CHILDREN AND YOUNG PERSONS’ ACCESS

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| | Maybe premises that want to allow children should have a specific family room. | | |
| Individual | N/A | N/A | N/A |
| Individual | Whilst I agree that children should be protected from excessive alcohol intake and rowdy behaviour in pubs, I do think that under 18s should be allowed in bars with their parents and family friends up to 8pm. | Allow children to be in pubs up to 8pm especially in venues that serve coffee snacks and meals. Many venues are not just bars and the ban on under 18s is prohibitive to young people who want to go out with family | Under 18s to be allowed in pubs with adults |
| Individual | Keep kids in pubs if there is food | | |
| Individual | | Where there is not a matching to adult hours with children and young people permitted in, which would be the best improvement, then clarity on children access and what is permitted. Either a colour coded sign on the door to the premises so it's clear and obvious what is permitted. | |
| Individual | Indicative hours to provide consistency. | There is a lack of options for people who are in the city overnight waiting for early transport options as there is very little night options except for bars and clubs. While the initial intent behind the access restriction is laudable if premises and customers were operating and behaving in a legal and sensible manner there would be no need for a restriction. Thus the restriction is, in itself, an admission of the failure to control the night time economy. | Consideration of enabling extended hours providing there was a designated "family" areas in premises. |
| Individual | | more pubs not letting under 18s in at all | |
| Organisation Leith Pubwatch | | Some outdated provisions in the current legislation relation to under 18s being | |

LICENSING BOARD CONSULTATION – CHILDREN AND YOUNG PERSONS’ ACCESS

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| | | able to have alcohol with meals, perry/cider vs spirits and other weird historical anomalies could do with tidying up. | |
| Individual | I think the indicative timings are ok and it's sensible that flexibility is allowed. While you don't want kids in a rowdy football pub you also need to be careful not to impact family events unfairly e.g. a wedding. | Ok as is | ok as is |
| Individual | Family atmosphere | | |
| Individual | Na | Na | Na |
| Individual | It is good to see that there are places that allow children adn that this works exceptionally well. | The culture of drinking is changing and there needs to be done to have the inclusion of children within venues that serve alcohol to breed a culture of sensible social drinking. There is a distinct barrier for children to enjoy things such as gigs as a result of drakonian drinks legislation. It can be workable though especially with gigs. An example of this was kids being able to attend gigs at Leith Theatre during the festival. The venue was also licenced, and this presented absolutely no issue. Such a measured and modern approach allows for children to see and appreciate contemporary music. | Ammendment to licencing especially around gigs to allow for children to attend live music venues including clubs. It woud seems reasonable that these venues could allow children accompanied by adults right up to the normal end times of gigs which is roughly 11pm. |
| Individual | current policy appears to work | | |
| Individual | | Although the board's guidance says young persons might be allowed on premises until 1am I'm not sure if anywhere does this in practice. Most places still have a policy that under 18s must be accompanied by an adult and | I think it needs more on how premises could operate in a way which is safe for young persons and encourages them. |

LICENSING BOARD CONSULTATION – CHILDREN AND YOUNG PERSONS’ ACCESS

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| | | that they are out when food stops being served around 9 or 10. This means teenagers have little to do in the city. | |
| Organisation Craigtinny and Meadowbank Community Council | 9pm for children under 14 works well but 15-18 year olds could stay till 10.30 in a premises serving food | It works fine as it is. | Nothing |
| Individual | | I can see no legitimate need for children to be in a licensed premises after 10pm, be that a hotel bar or premises licensed for a wedding or other function. By that time and I have witnessed and attended enough, including my own wedding at the age of 56 in 2011, and that was a fairly staid but enjoyable affair of 50 guests in Pollock Halls, to form a valid opinion either they are so tired and weary that they are well beyond being good company or all too often the adult behaviour has deteriorated to the point when any sensible parent would remove them. | |
| Individual | Licensees know their clientele and should be allowed to determine if their facilities are suitable for young people. | | |
| Individual | If its a family bar with food available then children should be entitled to stay a little later in the evening | 9pm could be 10pm | |
| Individual | Good that children have access under parental control | Nothing much | Nothing |
| Organisation Edinburgh Sovereign Council No1 | Not Applicable to us as we are an adult membership. | | |

LICENSING BOARD CONSULTATION – CHILDREN AND YOUNG PERSONS’ ACCESS

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| Individual | I'm happy with the current rules in this area. I think there need to be some protections for children and young people. | | |
| Individual | For pubs that serve food, it promotes a family atmosphere and provides more options for tourists with young children. They are also important for toilets - there is a serious lack of public toilets in the city which causes serious problems for families in the evening. More pubs admitting children, for more of the day, would help alleviate this issue. | As above, better access to facilities for young families. | Just a more liberal policy in general |
| Individual | Most places ignore current guidelines | Later times in licenced food premises | Adults should not be intoxicated whilst in charge of children in licenced premises |
| Individual | Family's can socialise together | Areas provided specifically for families | |
| Individual | | Children should be welcomed into pubs during the day without having to buy them a meal. These are social spaces that are part of the fabric of Scottish culture and should not be demonised and given the image of being unsafe. | |
| Individual | Yes in areas away from bar | | Everything |
| Individual | The TTF gig going ahead at Ingliston. It is not a "rave" these guys have their own audience and there has never been any drug related issues at any of their gigs, or anything related just one big family coming together and you have upped the rug from under them 3 weeks before. Ridiculous! They are being used as scape goats. | The TTF gig going ahead at Ingliston. It is not a "rave" these guys have their own audience and there has never been any drug related issues at any of their gigs, or anything related just one big family coming together and you have upped the rug from under them 3 weeks before. Ridiculous! They are being used as scape goats. | The TTF gig going ahead at Ingliston. It is not a "rave" these guys have their own audience and there has never been any drug related issues at any of their gigs, or anything related just one big family coming together and you have upped the rug from under them 3 weeks before. Ridiculous! They are being used as scape goats. |
| Individual | The looking under 25 policy. | | |

LICENSING BOARD CONSULTATION – CHILDREN AND YOUNG PERSONS’ ACCESS

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| Individual | Proper demarcation of premises separating 'predominantly bar / drink' from 'family food with drink'. The current indicative terminal hours. | Premises unable to grant access to children / young people need to make this as clear as possible at the front door - I'm thinking here in particular of (overseas) visitor access requests, misunderstandings and disappointment. Some sort of colour- / symbol-coded sign or indicator at the entrance would help. | |
| Individual | Being able to have young people and children in for meals, entertainment and the like works great for socialising and community bonding. The previous rules of "have to be away from a bar" etc were outdated. | Many venues need young people to be out by 9pm. As mentioned earlier in the gig economy we are now in people sometimes finish work later, have second jobs and the like and are therefore having to rush to have a meal with their family as a treat or special experience. It should be up to the venue when they allow children and young people in - say 11pm on non-school days. | Other than the times, it works as it is. |
| Individual | Allows family time together in a welcoming environment. Empowers parents / young people | Removing cut off time for children to be in licensed premises, especially where food is served. | |
| Individual | Family time together. Good place to pop in if it is raining. Good for tourism and the image of the city. | | |
| Individual | nothing | | Stricter rules about times for children to be in bars or pubs. Licensed venues after 7/8pm are unsafe and unwelcoming environments for children to be in, and most adult customers do not want children in the bar past these times either |
| Individual | | Children should be allowed into a licensed premises with their | |

LICENSING BOARD CONSULTATION – CHILDREN AND YOUNG PERSONS’ ACCESS

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| | | parents/other adults if the reason for their visit is to eat, including after 8pm. | |
| Individual | Don't have kids so can't comment | Don't have kids so can't comment | Don't have kids so can't comment |
| Individual | No comment | No comment | No comment |
| Individual | Asking for I'd only works in large retailers, too many smaller businesses still sell to underage children | A license should be instantly removed from a business if they fail to follow the law | Shorter cut off time |
| Organisation Scottish Grocers' Federation | | | In reference to off-sales type premises, SGF promote responsible community retailing and recognise the importance of selling alcohol in a responsible way. This happens through the following key areas: <ul style="list-style-type: none"> • Full compliance with the Challenge 25 regulations (an initiative developed in partnership with SGF) • Staff training • Appropriate signage • In-house test purchasing • Refusal books • Use of CCTV • Full compliance with the stores operating plan • Age restricted till prompts, upon customer checkout |
| Individual | Na | Na | Na |
| Individual | Leave alone | The council backing off | The council leaving it alone |
| Individual | As stated before children need to be allowed in with adults but without the need to order food. Move with the times . | | |
| Individual | The flexibility offered allows managers and landlords - those who know their clientele the best - to cater their provision to the needs of their customers | Current arrangements are satisfactory to me | See previous |

LICENSING BOARD CONSULTATION – CHILDREN AND YOUNG PERSONS’ ACCESS

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| Organisation NTBCC Licensing | Our view is that the Board should continue to look at this on a case by case basis. | The distinction between 11pm and 1am as indicative terminal hours for children inside a licensed premises is unclear - we would expect children to always be accompanied by an adult in any case. | |
| Individual | Never thought about it. No children and therefore no opinion | No opinion on this | N/A |
| Organisation Equally Safe Edinburgh Committee (Vice Chair) (employed as CEO of Edinburgh Women's Aid) | We are pleased to see the recommendation that changing facilities should be made available for parents of all genders. | It would be very helpful if there were closer monitoring, or if the recommendation for changing facilities for parents of all genders were made compulsory. In the experience of ESEC members, this is not always upheld. | We would like to see licensed premises participating in the Free Period Products Scheme, as this is now a legal entitlement for all women in Scotland who need them. Currently, the scheme lists a number of locations where free period products can be collected on the PickUpMyPeriod locator app. However, this does not list licensed premises. It would be extremely helpful for the policy to include the provision of free period products as a condition and for this to be publicised on the relevant app and beyond. |
| Individual | Seems ok. | Nothing comes to mind. | NA |

LICENSING BOARD CONSULTATION – EXTENDED HOURS

| Are you responding as an individual or as an organisation? (inc name of organisation) | What works well with the extension of licensed hours? | What could be improved upon? | What else would you like to see included under this section in the updated policy? |
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| Organisation GRASS (Grassmarket Residents' Association) | Nothing | There is no need to extend opening hours at Christmas or the Festival when licensees are busy and residents are already disrupted. | No licenses for alcohol, not even temporary ones for events should be permitted in public places like the Tattoo or in parks and green spaces like West Princes Street Gardens which is fast being taken over by large commercial operators. |
| Individual | An extension of hours seems to benefit No one So if it's 9am 10am or 11 am | Expand your communication with for example street pastor teams, get to know your vulnerable citizens and residents and visitors better Foster good relationships with citizens and look at areas of inequalities An extension of hours seems to benefit No one So if it's 9am 10am or 11 am The extension can cause further harm to public by Over indulgence Later noise pollution More waste on street It should be a whole better educated Better controlled activity IE social drinking Vs Edinburgh culture of overindulgence Don't let it happen Take responsibility and change for the better of society | If responsibility for any activity is with person operating on the premises Make sure they are educated pre license so they actually don't ruin lives of citizens You give them opportunity by issue It seems good on paper but in reality the overall situation of license matters is very very very flawed |
| Individual | Nothing | Rejection of hours | Over 21s |
| Individual | Nothing it just makes the time people can cause problems longer. | Shorten the times. | |
| Individual | | | |
| Individual | Tourism | | |

LICENSING BOARD CONSULTATION – EXTENDED HOURS

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| Individual | It gives a normality, like someone lives in a decent city. | Relaxed operational hours. | N/A |
| Individual | | | |
| Individual | Keeping people safer | Focus extra times from all over the city | |
| Individual | I've only good experiences of extended opening hours for the festival, festive period etc. | | |
| Individual | Very little. | It should be removed or further restricted as the existing situation within the city centre is not tenable for residents particular those in the Old Town in single glazed tenement buildings and with the topography of the city, namely the Cowgate, further amplifying and carrying sound. | Further detail and restrictions of occasional licences in order to protect residential amenity and year round businesses. |
| Individual | | | |
| Individual | | | |
| Individual | It needs to be granted automatically and not charged back to pubs especially ones not owned by groups. | | Increase the sale of alcohol in shops, supermarkets etc from 10pm to 11pm. |
| Organisation Leith Pubwatch | Leith is an important cultural centre in Edinburgh but there is no current provision for a Leith extended hours. During the festival, Leith loses alot of trade to Edinburgh due to the heavily biased funding to the centre of Edinburgh as well as the volume of attractions in town. A more equitable share of funding and a Leith Festival extended hours for the duration of June would be of benefit as that is when all the Leith events (Festival, Jazz & Blues Festival etc) are on | | |

LICENSING BOARD CONSULTATION – EXTENDED HOURS

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| Individual | I think it's clear and proportionate so that it's not all year round but for the right sort of events and activities. | Happy with as is. | Happy with as is. |
| Individual | Flexibility | | Over 21s |
| Individual | Not much unless you're proud of contributing to some of the highest alcohol related deaths in the world. | We need to realise that we should not be encouraging people to drink excessively and current licensing approach does just that. Not sure how you can rightly justify so many places being able to serve alcohol past day 11pm when the impact it is having on people's lives is clear. Absolutely some places should have later license but the vast number of places that have 1 pm and 3 pm license in the city is pure insanity. | |
| Individual | Simply the extension should not be required. There should be normal licence conditions in place running till later. Why should it only be at the dictact of tourism that we are allowed to enjoy our venues till later. | Licensing should be revised back to allow licencing till 5 am overall | Amendment to normal licencing conditions to not require extensions |
| Individual | the current wording is fine | nothing | |
| Individual | It's OK | Nothing in particular | Nothing |
| Individual | It lets people experience more of the festivals for longer. | Nothing, I like the way extended hours operate. | |
| Organisation Craigentinny and Meadowbank Community Council | The 2 hour extension works well seasonally. The 3 to 5 am for night clubs enables staff who finish late to socialise somewhere which is good for their mental health. | Continual complainers who clearly have vendettas against licensed premises should not be able to continually complain about the same issue after it has been dealt with through due process. | Nothing |
| Individual | | | |
| Individual | | | |

LICENSING BOARD CONSULTATION – EXTENDED HOURS

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| Individual | It's good in lots of ways. A steady flow of people leaving bars means taxis are more accessible for everyone. Rather than a 3am mad rush were no city could cope with demand | Having a few late licenced restaurants would be a nice touch for our capital city. Not just one as we had before (McDonald's on princes st) which became a nightmare because it was far too popular with people having no choice. Then closed because of trouble. And all the councils fault 100% | Nightclubs being allowed to open later into the night. 3am isn't acceptable in 2023 |
| Individual | | | |
| Individual | Good for visitors and general hospitality | Nothing really | Nothing |
| Organisation Edinburgh Sovereign Council No1 | | | |
| Individual | I think the current policy works well. However, it begs the question why premises can't close later all the time. | I would like to see some justification why later opening hours are acceptable during 2 periods of the year (August and NYE) but not for the other 10.5 months of the year. Other cities don't have these strict rules around opening times and society functions happily. | |
| Individual | It encourages a more relaxed drinking culture and minimises the impact of closing time. | Extended licenses should be available more widely and for longer periods of time. | Coordinate with Lothian Buses so that closing times coincide with available Nightbuses. |
| Individual | It works fairly well | More awareness from licence holders | Earlier opening times for off sales |
| Individual | | | |
| Individual | | More consideration should be given to the impact of extended hours on residents, the aesthetics (eg tacky short-term outdoor spaces) and other businesses in the area. | |
| Individual | Stops crowds all leaving premises at once at closing time. | 24 hour opening | 24 hour opening |
| Individual | | | |

LICENSING BOARD CONSULTATION – EXTENDED HOURS

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| Individual | | | |
| Individual | | A sent ma private hire receipt 2 uber which they have rejected ,it seems 2 happen every year can't understand why council don't email receipt strait 2 uber..simples | |
| Individual | | | |
| Individual | | | |
| Individual | | | |
| Individual | 3am | Everything | Everything |
| Individual | The TTF gig going ahead at Ingliston. It is not a “rave” these guys have their own audience and there has never been any drug related issues at any of their gigs, or anything related just one big family coming together and you have upped the rug from under them 3 weeks before. Ridiculous! They are being used as scape goats. | The TTF gig going ahead at Ingliston. It is not a “rave” these guys have their own audience and there has never been any drug related issues at any of their gigs, or anything related just one big family coming together and you have upped the rug from under them 3 weeks before. Ridiculous! They are being used as scape goats. | The TTF gig going ahead at Ingliston. It is not a “rave” these guys have their own audience and there has never been any drug related issues at any of their gigs, or anything related just one big family coming together and you have upped the rug from under them 3 weeks before. Ridiculous! They are being used as scape goats. |
| Individual | | | |
| Individual | Nothing. | No extended hours in residential areas. | A more rigorous enforcement policy. |
| Individual | 'Special occasions' and 'events of significance' are generally well catered for. | Given the staff resource available to deal with the volume of licensing-related work / correspondence, I'd read it that there is big pressure on extension requests by way of the 'special needs / exceptional reasons' 'shortened timescale' route. There has got to be adequate resistance to undue manipulation here." | |
| Individual | | Make everywhere 24 hours | 24hour opening |
| Individual | | | |
| Organisation Unite the Union | The current licensed hours allow for hospitality venues to cater for all | Unite Hospitality notes that whilst the extension of licensed hours during certain | Unite Hospitality would ask for the licensing board to consider the safety |

LICENSING BOARD CONSULTATION – EXTENDED HOURS

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| | <p>elements of hospitality. This ranges from restaurants, hotels, late night bars and casinos to nightclubs.</p> | <p>periods of the year is enjoyable for customers and enhances profits for employers and businesses this can make travel home for hospitality staff exceptionally difficult.</p> <p>An improvement and prerequisite to the extension of hours would be to ensure that travel costs for staff would be in line with the demands of the Get Me Home Safely campaign. Ensuring the extra hour of service does not cause financial or safety concerns for hospitality staff.</p> | <p>risks of the night time economy for both staff and customers and work to:</p> <ul style="list-style-type: none"> • Identify workable solutions to facilitate safe travel home, such as getting supplemented taxi travel for late shift workers. • Introduce compulsory training on sexual harassment/gender based violence for workers in passenger transport – Unite Taxi School deliver this as part of their taxi driver training. This training would better equip transport workers to report and takes steps against sexual harassment where it occurs on our buses, tubes and trains. |
| <p>Individual</p> | <p>Any premises can apply for the extended hours, it is not restricted to certain areas such as city centre only which gives a sense of fairness. Festive times have automatic extensions which work well.</p> | <p>As shown on a government poll recently, the UK is no longer predominantly Christian, but we still give automatic extensions only on Christmas holidays. This should be included to be automatically given for all religious/cultural festive days. Festival of light, Chinese New Year, etc.</p> | <p>Definitive guidance on music policy. The previous clause of "no amplified music shall be audible" was absolutely appalling.</p> <p>A venue playing a brass band would have no issue playing music until 1am, and yet a venue with a single singer singing into a PA with an acoustic guitar was not acceptable.</p> <p>This made no sense at all.</p> <p>It is understandable that some pubs were previously houses or shops and did not have the infrastructure to stop sound travelling, but there were also continual complainers who simply had issues of various sorts complaining to punish pubs.</p> |

LICENSING BOARD CONSULTATION – EXTENDED HOURS

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| Individual | Gives people freedom to enjoy free time without binge drinking to finish early better for business / tourism. | | |
| Individual | Good for tourism. | | |
| Individual | <p>Unite Hospitality notes that whilst the extension of licensed hours during certain periods of the year is enjoyable for customers and enhances profits for employers and businesses this can make travel home for hospitality staff exceptionally difficult.</p> <p>An improvement and prerequisite to the extension of hours would be to ensure that travel costs for staff would be in line with the demands of the Get Me Home Safely campaign.</p> <p>Ensuring the extra hour of service does not cause financial or safety concerns for hospitality staff.</p> | <p>Unite Hospitality notes that whilst the extension of licensed hours during certain periods of the year is enjoyable for customers and enhances profits for employers and businesses this can make travel home for hospitality staff exceptionally difficult.</p> <p>An improvement and prerequisite to the extension of hours would be to ensure that travel costs for staff would be in line with the demands of the Get Me Home Safely campaign.</p> <p>Ensuring the extra hour of service does not cause financial or safety concerns for hospitality staff.</p> | <p>Unite Hospitality would ask for the licensing board to consider the safety risks of the night time economy for both staff and customers and work to:</p> <ul style="list-style-type: none"> • Identify workable solutions to facilitate safe travel home, such as getting supplemented taxi travel for late shift workers. • Introduce compulsory training on sexual harassment/gender based violence for workers in passenger transport – Unite Taxi School deliver this as part of their taxi driver training. This training would better equip transport workers to report and takes steps against sexual harassment where it occurs on our buses, tubes and trains. |
| Individual | Nothing, all it does is give more money to employers who pocket the profits and do not give their employees extra money for working the extended hours. It also drastically impacts safety of getting home after work | access to safe travel and compensation for working extended licensing hours beyond usual opening times | |
| Individual | | | Premises should be able to demonstrate they are well managed before being granted a late extension. It should not be |

LICENSING BOARD CONSULTATION – EXTENDED HOURS

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| | | | automatic. Any serious complaints should result in the immediate withdrawal of the extension by the licensing officers, and should not require a Board hearing. The extension should only be re-granted after withdrawal only when the premises provide an improved operating plan |
| Individual | Caters for the tourist market, however local residents neglected. Fine to have extension in August & December but not outwith..? | If premises can staff the venue and there is no history of trouble or anti-social behaviour, the business should be allowed to decide if they want to open later should they wish too. | All extended opening hours as normal for businesses that wish to operate them |
| Individual | All fine | Nothing | Further conditions |
| Individual | Seems to work fine | | |
| Organisation Scottish Grocers' Federation | | | |
| Individual | More money for bars | Less noise Cleaning up Rubbish | Improved litter clean up |
| Individual | Leave as is | The council backing off | No updates |
| Individual | | | Extended off sales timings. |
| Individual | No issues | Stop authorising these pop up bars and wooden terraces they ruin the trade and shame the look of Edinburgh | |
| Individual | | | |
| Organisation NTBCC Licensing | | We would suggest a maximum number of days per year - enough to cover the Festival/Fringe and Festive season, typically. | Better notifications to neighbours. The majority of people are completely unaware of variations to existing licences when they are made, as the notification process is not fit for purpose - i.e. limited to 4m radius! This arguably might have the biggest impact on neighbouring residential amenity, therefore we would welcome an |

LICENSING BOARD CONSULTATION – EXTENDED HOURS

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| | | | attempt from the Board to go beyond the minimum legal requirement here. |
| Individual | Staggering the business on the streets. Taxis are easier to get and the streets are less busy than when everyone is chucked out at the same time | Increasing hours to minimise the last point | Treating people like adults |
| Individual | | | |
| Organisation Equally Safe Edinburgh Committee (Vice Chair) (employed as CEO of Edinburgh Women's Aid) | The ESEC has no comment on this question. | The ESEC has no comment on this question. | The ESEC has no comment on this question. |
| Organisation Tollcross Community Council | | | |
| Individual | most of it. | Nothing comes to mind. | It would be better if the applicant could pick the length of the extension rather than an arbitrary 2 hours. As that may miss the purpose of the event. |
| Individual | | There does not need to be extended hours, except for new year's eve. The rate of alcohol-related crimes and hospital admissions is far too high in this city to even consider more hours of alcohol licensing. Public Health experts and the police should be key contributors to this policy. | |

LICENSING BOARD CONSULTATION – LICENSING HOURS

| Are you responding as an individual or as an organisation? (Organisation name) | What works well with the current licensed hours? | What could be improved upon? | What else would you like to see included under this section in the updated policy? |
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| <p>Organisation GRASS (Grassmarket Residents' Association)</p> | <p>Little</p> | <p>Closing time for pubs should be 11pm at all all times and 12 for late night catering licenses. This is also a residential area with many bedrooms in tenemented properties above pubs and facing the Grassmarket. Everyone has a right to a good night's sleep. without late night noise, littering anti-social behaviour. Those with on-sales licences should be required to move customers away from their premises before closing time. Those with live music should be required to have adequate internal ventilation or to have no live music after 8pm. The recent trend for pubs to sell pints to take away in single use cartons should be disallowed.</p> <p>Lack of enforcement means that residents have little recourse to official sources as the police are overstretched and their 101 number is rarely answered. Some publicans are abusive when faced with complaints from individuals. Residents rarely therefore lodge complaints so the licensing board assume that there have been no complaints.</p> | |

LICENSING BOARD CONSULTATION – LICENSING HOURS

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| | | <p>As a minimum all licensed premises should be required to display their current licence and any application prominently at reading height. The process of objection should also be much more user friendly eg the name of the premises being applied for and expecting residents many of whom are working to set aside a whole day to their objection to be heard in person at the Licensing Board is unrealistic.</p> <p>We need a much more transparent and user friendly computer system like Edinburgh's Planning Portal with more detail about the applicant and exactly what they are applying for - this has been promised for many years but as yet there is no sign of action</p> | |
| <p>Individual</p> | <p>You are overall responsibility holders which is good that you are aware of the long-standing unresolved issues That's the one good point premises licences and provisional premises licences → occasional licences and extended hours → personal licences → variations of licences → transfers</p> | <p>What would work well is if there was</p> <ul style="list-style-type: none"> A. Not overprovision B. Certain establishments did NOT have outdoor facilities especially where close proximity to residents homes C. A full review of Drummond Street, Roxburgh Place, Hill Place, Surgeon Quarter, All opposite Bristo Square <p>It's not setting a good example of public services organizations fostering good relationships with community Or setting a good example for students</p> | <p>More PROTECTION for those who object</p> <p>Less harm to those who object</p> <p>Standards official (s) be less intimidating</p> <p>Standards officials don't cause harm</p> <p>Standards are really laid down to license holders</p> |

LICENSING BOARD CONSULTATION – LICENSING HOURS

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| | | You are overall responsibility holders which is good that you are aware of the long-standing unresolved issues | |
| Individual | Nothing | Shorter closing times | Over 21s |
| Individual | The less times people can buy alcohol the better. We need to move away from the drinking culture in the UK. | Shorter periods where alcohol can be bought. Clubs and pubs closing earlier. Restaurants given discount off council tax if not selling alcohol. | Bigger fines for pubs and clubs that are involved in on street incidents outside of the premises. |
| Individual | | Later last hour for pubs and bars - I shouldn't have to go to a club or a casino (which should have the same last hour as pubs and bars - why would you want to encourage people to go to a place of gambling to continue drinking???) to continue having a quiet drink with friends | |
| Individual | I think 11:00 until 24:00 would be fine. | As far as hours go all premises should be able to open all through the day without having to apply for special licences. | Nothing |
| Individual | N/A | I think that the most strict rules apply to any occasion the most problems will appear. The majority of the European countries have relaxed rules in regards of hours operation. | N/A |
| Individual | They are fine as they are | Nothing | No comments |
| Individual | Late start stops problem drinkers shopping before 10am | Restrict hours in supermarkets | Default extra hours for festivals isn't good |
| Individual | Largely standard hours across the city which are well known to residents and visitors. | Variation for day of week is outdated and standard hours should be available to all licensed premises should the wish to operate for all of them. | Standardise the hours for children to match existing for adults, and put responsibility for children welfare on the accompanying adults. |

LICENSING BOARD CONSULTATION – LICENSING HOURS

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| Individual | Citywide hours provides a consistent and straightforward approach which means everyone is aware of the situation and makes any breaches easy to notice. It ensures equity as Edinburgh, including the city centre, is residential and any variations that would favour city centre operators would be default disfavour city centre residents. | There should be no seasonal variations. This approach simply exacerbates existing problems for everyone and impacted local residents and workers have no means of escape. It also favours external "pop-up" operators over local businesses who paid rates and provide employment year round. | More detail and citywide conditions regarding use of outside areas and amplified noise. |
| Individual | | Not able to buy alcohol in a shop until 10am is ridiculous. If you want to get booze, you have to delay your shopping | |
| Individual | Pubs can be open for a good amount of time | More flexible with closing hours so you don't get every pub chucking out at once. | |
| Individual | | Premises should be able to apply for a licence in single day blocks not 14 as is current process I believe. City centre Pubs should be allowed to open until 3am with a 1am latest entry requirement. City centre nightclubs should be allowed to open until 5am with a 3am latest entry requirement. Not allowing pubs and clubs later opening hours makes Edinburgh less competitive and unattractive to tourists who are younger and want to spend time socialising. | And increase of two hours to all late licences with the option of adding in a lockout timeframe to justify it. Ability to obtain licences in day blocks not just in 14 day windows. |
| Organisation Leith Pubwatch | Everything except bin collections | Enforcement of 3rd party noise timeframes directly onto those 3rd | |

LICENSING BOARD CONSULTATION – LICENSING HOURS

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| | | parties rather than licensed premises who are obliged to use them but can have no real control over their activities due to the nature of the monopoly and the contractual nature of their business models. | |
| Individual | They are clearly defined and easy to understand. | Happy with them as is. | Happy with it as is. |
| Individual | Flexibility | More local consultation | |
| Individual | We obviously have a thriving and profitable bar offering in the city, which strongly contributes to Scotland's problem with alcohol. | Little regard for residential residents that leave near bars. Too little emphasis put on controlling noise from bars past reasonable time (10pm). Too many bars are serving alcohol past social hours (let's assume 11 /12 pm). Residents views and concerns not taken seriously. Licensing policy should take responsibility for reducing the rampant alcoholism this city and country face. | More specification and rules set between inside and outside areas. More clarity on expectations that licenced premise should have to control the behaviour of their patrons, inside, outside and around their premise |
| Individual | There are clear set out guidelines and times. | Current licenced hours are restrictive with clubs only being open till 3 am. Pubs being open till 1am is a sensible approach. | |
| Individual | Flexibility to suit local and business circumstances | Being able to deal with premises that do not operate their licensed hours in whole or in part | an obligation to use cashless payments in addition to cash |
| Individual | It's OK | Nothing in particular | Nothing extra |
| Individual | It staggers closing times well, letting people who work late have places to meet and drink. It allows | Closing times at night should match nearby bus times. For example Banshee Labyrinth and The Hive close at 3 on the hour per their license but the N30 doesn't | |

LICENSING BOARD CONSULTATION – LICENSING HOURS

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| | more time during peak festival seasons. | stop at South Bridge until around 3:25. If people were leaving at 3:15 instead it would mean less time standing around in the dark at 3am. | |
| Organisation Craigentenny and Meadowbank Community Council | The 9am to 1am works well as is. 11am is fine as well for a start time. 3am closing for late night venues is fine. 7 days per week is fine. | Some noise complaints happen due to amplified music due to buildings not having any sound proofing/doubl glazing. e.g a converted shop to pub with single pane glazing and having a full band on a Wednesday night | It works fine as it is |
| Individual | | I can see no legitimate need for children to be in a licensed premises after 10pm, be that a hotel bar or premises licensed for a wedding or other function. By that time and I have witnessed and attended enough, including my own wedding at the age of 56 in 2011, and that was a fairly staid but enjoyable affair of 50 guests in Pollock Halls, to form a valid opinion either they are so tired and weary that they are well beyond being good company or all too often the adult behaviour has deteriorated to the point when any sensible parent would remove them. | |
| Individual | It is important that all citizens are able to access hospitality services so authorities should be flexible when allowing a wide range of licensed hours. | | |

LICENSING BOARD CONSULTATION – LICENSING HOURS

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| Individual | The Edinburgh Festival and Christmas are great and civilised opening times. Apart from midweek when food takeaways have to close before the bars | Keep the festival and Christmas hours going all year round. It's tragic and antiquated everyone getting kicked out at 3am with nowhere to go. | Food takeaways allowed to stay open for an hour or two after bars are forced to close. It's such a boring capital city. For young people. |
| Individual | Stopping drinking beeing served after 9 pm | Better enforvement of alcohol not being allowed out of the premises after 9pm | The police to have powers to confiscate any alcohol even unopened from people at any time |
| Individual | Fairly easy to get an alcoholic drink during reasonable hours | Nothing much | Nothing |
| Organisation Edinburgh Sovereign Council No1 | Doesn't affect our organisation as we only require the bar for 4hours on an occasional basis 4 meetings per year. | | |
| Individual | I think closing outdoor drinking areas at 10PM is a good idea when there are neighbouring residential properties. | "I think outdoor drinking areas should be allowed to stay open past 10PM in areas which are mostly commercial rather than residential (i.e. George Street/Grassmarket). I think having a set closing time of 3am for late night venues causes a huge surge of drunk people to all enter the streets at the same time which leads to problems. If closing times were relaxed, people would gradually leave during the course of the night/early morning avoiding this sudden rush. I also see no need why premises selling hot food, but not alcohol, should need to close at any point (i.e. they should have 24 hour licences). | |

LICENSING BOARD CONSULTATION – LICENSING HOURS

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| Individual | Late opening pubs, as opposed to clubs. Places you can sit and have a pint until 3 without having to put up with thumping dance music or sticky floors. Also places that serve food late, like Ox184. More of that type of business would promote a more relaxed drinking culture and minimise the impact of "chucking out time". | The 5am licenses that are granted for limited times of the year, such as August and around Christmas, should be available for more of the year. A more relaxed drinking culture, minimising the pressure of "drinking up time", should be encouraged. | Take into account the Nightbuses that are scheduled for certain areas and certain times. This will help keep drinkers safe and remove them from the city centre quicker at the end of the night. |
| Individual | Nothing | "Longer hours Extension to children being allowed in especially for food" | Off sales until midnight |
| Individual | They help young and old to socialise which is important after the last couple of years we have had. | Extend the licensing hours to allow more socialisation for both the young and old and everyone in between. | 24 hours opening would spread the anti social behaviour that can occur when pubs and clubs close and put everyone out on the street at the same time. |
| Individual | | Licensing during the August Festivals should be less of a free for all. | |
| Individual | | Not selling alcohol in shops before 10am is stupid and inconvenient. I was once stopped from buying chocolates because they had some liqueur in them. | Changing the 10am start time to 7am would be enough for me |
| Individual | | The night-time economy of Edinburgh could be much more lucrative and successful. The strict 1am curfew for pubs and 3am curfew for nightclubs (aside from the festival and Christmas times) is very outdated and in stark contrast when | |

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| | | <p>you visit other UK cities (Glasgow, Manchester, Leeds, London among many others).</p> <p>Enforcing all people attending pubs and clubs to all leave these facilities early and at the same time means it is much harder to guarantee safe journeys home- taxis are not available for this many people and not enough night buses run (these should be every half hour as opposed to every hour).</p> | |
| Individual | <p>Your current rules don't matter you make things up as you go along.</p> <p>Cancellation of a gig that's never had trouble but you allow the street party</p> | <p>Being more open and transparent then you wouldn't be regarded as corrupt</p> | <p>Properly investigated gigs not knee jerk reactions</p> |
| Individual | <p>The TTF gig going ahead at Ingliston. It is not a "rave" these guys have their own audience and there has never been any drug related issues at any of their gigs, or anything related just one big family coming together and you have upped the rug from under them 3 weeks before. Ridiculous! They are being used as scape goats. LET THE SHOW GO AHEAD!</p> | <p>The TTF gig going ahead at Ingliston. It is not a "rave" these guys have their own audience and there has never been any drug related issues at any of their gigs, or anything related just one big family coming together and you have upped the rug from under them 3 weeks before. Ridiculous! They are being used as scape goats.</p> | |

LICENSING BOARD CONSULTATION – LICENSING HOURS

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| Individual | Automatic license additions for august and Xmas is great. | Improve times to consider applications extensions etc | Less pop ups and occasional licenses |
| Individual | | Preventing premises in residential areas having outdoor licences allowing noisy and highly lit outdoor drinking areas up to 1 am. Even 10 pm seems unreasonable in the middle of residential areas. | No outdoor canned music. |
| Individual | The width / range of premises granted room to apply for a licence set in the context of local resident and visitor flows across the day - meeting a wide variety of 'wants'. | Curbs on early-evening 'family' access (with under-aged) to licensed catering establishments (beyond hotels). | A hardening of the language on commitment to 'level playing field' and on 'pushback' against being 'gamed' into extensions of hours on the grounds of the 'uniqueness' of a particular trade venue 'offer'. |
| Individual | Opening time | Open for longer | 24 hour opening |
| Individual | | No limits means all the consumption is carried out in a short period and means there are often peak times of travel late at night. Removing these restrictions would stagger the late night travel of consumers and make it safer and quieter | More flexibility |
| Organisation Unite the Union | The current licensed hours allow for hospitality venues to cater for all elements of hospitality. This ranges from restaurants, hotels, late night bars and casinos to nightclubs. | Edinburgh council has municipal ownership of the buses that operate in the Lothian area. We would ask that more work can be done to ensure that there is a transport infrastructure in place that supports late night workers getting home from work. This service must be reliable. We would ask that all areas of the city be well lit and to consider that as a | The Get Me Home Safely Campaign launched by Unite is to ensure low paid, late night workers travel safely from work. This campaign is rooted on a concern for women's safety who work late at night. As stated the low paid element of late night work leads to having workers like hospitality staff being forced into dangerous situations and financial precarity. This should not fall on the shoulders of workers but the employers and council bodies to ensure all workers get home from work safely. |

LICENSING BOARD CONSULTATION – LICENSING HOURS

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| | | <p>responsibility of not just Edinburgh city council but the licensing board to ensure anyone involved in the late night economy can safely get to and from a venue.</p> <p>We ask that Edinburgh City Council licensing board work to improve the safety of staff that work in licensed premises. The licensing objective of the council: preventing crime and disorder, securing public safety, preventing public nuisance, protecting and improving public health and protecting children and young persons from harm must also consider the staff in licensed premises and reflect that with any legal challenges the board may face.</p> <p>The final task Unite the Union has for improving the licensing board is to work with Unite Hospitality regularly to ensure that the voices of workers in venues is reflected in decision making for granting of licensing on par with the businesses putting in licensing requests.</p> | <p>Edinburgh city council unanimously passed Unite’s Get Me Home Safely campaign during full council on 27/10/22. As Scotland’s second largest council this is a positive move towards ensuring the safety of all late night staff leaving their workplace. We would now ask that the licensing board of Edinburgh city council consolidate that motion into their licensing objectives for the next council. We have outlined the key demands of the campaign for the Edinburgh board to consider:</p> <ul style="list-style-type: none"> ·Many industries which make Edinburgh thrive – including hospitality, health and social care, and cleaning – depend on shift work which can often entail late-night working. ·These are sectors which predominantly employ women, and many workers are increasingly worried about their safety travelling to and from work at night; ·Both employers and decision makers have a duty of care towards workers in Edinburgh, which does not end when an employee finishes their shift but need to take into consideration journeys home, especially during unsocial hours; ·Unite the union’s ‘Get Me Home Safely’ campaign calls on employers to take all reasonable steps to ensure workers are able to get home safely from work at night, ·Last year, East Dunbartonshire Council adopted a Supplementary Statement of Licensing Policy meaning that Hospitality venues in East Dunbartonshire will now have to ensure their employees can safely travel to and from work late at night, or risk losing their licence. |
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LICENSING BOARD CONSULTATION – LICENSING HOURS

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| | | | <p>And therefore council:</p> <ul style="list-style-type: none"> -Fully supports Unite the union’s ‘Get Me Home Safely’ campaign -Instructs relevant officers in Licensing, Transport and Community Safety to design an implementation plan to meet the aims of this campaign including: <ul style="list-style-type: none"> -Adopting of a policy to ensure that the approval of late-night licences will be contingent on employers funding safe transport home for their shift workers, thereby ensuring that workers don’t face additional financial penalties or risk for undertaking late night shifts; -Engaging with Lothian buses and Edinburgh trams regarding the provision of better night-time public transport services which links with the needs of shift workers; -Using Edinburgh Council’s voice on regional and national bodies to advocate for any additional legislative changes, for example around private car hire use and taxable benefits, which may be required to ensure that our city’s workers are able to travel home safely without incurring additional costs. |
| <p>Individual</p> | <p>The current licensed hours works well in that most places have the potential hours so that there is an even competition for trade and not too many people congregating on only a few venues. E.g if all bars can</p> | <p>We do not aim to hold enough provision for the gig economy that is upon us now. People take on second jobs and work late, possibly finishing at 10pm or later and there is a disparagement whereby those people will have only between one or three hours to consume alcohol instead of being able to pace themselves</p> | <p>We seem to have abandoned any control over outdoor seating, and now places such as Cockburn Street, George Street, even the Boathouse in Portobello seem to have huge sprawling areas, spilling out onto structures on the roads that are themselves the size of some small pubs. This was understandable during the Pandemic when we were trying to keep the economy afloat by allowing more job creation, more potential income for businesses and a spread-</p> |

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| | <p>stay open till 1am with their extensions then people will spread out over many bars. If only 2 bars in an area that has a provision of 12 stay open until 1am and the rest close at 11pm then naturally people wanting to stay out later will congregate en masse to the two places open until 1am.</p> | <p>if they want to have the same amount as someone who finishes at say 5pm. We no longer live in a society where people work 9-5 Mon-Fri and we do not account for this in our licensed hours. Basically we encourage drink binging by not allowing staggered opening hours anymore. The opening times of 6am have pretty much gone now, so there is no provision for nightshift workers coming off their shift to go out, which is unfair as we do have that provision for dayshift workers coming off shift.</p> | <p>out clientele to keep to the 2-meter requirement, but this is all gone now and we see bike lanes, car park spaces, delivery areas and the like all now covered by mini-pubs attached to licensed venues which is completely out of control.</p> |
| Individual | Well publicised, lengthy window | Longer opening hours at weekends or public holidays. Earlier hours for retail on Sundays. | |
| Individual | Late enough for most venues during the week. | Quite limited for Friday night and Saturday night, perhaps an extra hour could be granted here. | 24 hour licenses (maybe it Friday and Saturday) in areas with no residents (i.e central), to allow all-night nightclubs like some other cities. Maybe this is already allowed... |
| Individual | Works well for most businesses in hospitality | <p>Edinburgh council has municipal ownership of the buses that operate in the Lothian area. We would ask that more work can be done to ensure that there is a transport infrastructure in place that supports late night workers getting home from work. This service must be reliable.</p> <p>We would ask that all areas of the city be well lit and to consider that as a responsibility of not</p> | <p>The Get Me Home Safely Campaign launched by Unite is to ensure low paid, late night workers travel safely from work. This campaign is rooted on a concern for women’s safety who work late at night. As stated the low paid element of late night work leads to having workers like hospitality staff being forced into dangerous situations and financial precarity. This should not fall on the shoulders of workers but the employers and council bodies to ensure all workers get home from work safely.</p> <p>Edinburgh city council unanimously passed Unite’s Get Me Home Safely campaign during full</p> |

LICENSING BOARD CONSULTATION – LICENSING HOURS

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| | | <p>just Edinburgh city council but the licensing board to ensure anyone involved in the late night economy can safely get to and from a venue.</p> <p>We ask that Edinburgh City Council licensing board work to improve the safety of staff that work in licensed premises. The licensing objective of the council: preventing crime and disorder, securing public safety, preventing public nuisance, protecting and improving public health and protecting children and young persons from harm must also consider the staff in licensed premises and reflect that with any legal challenges the board may face.</p> <p>The final task Unite the Union has for improving the licensing board is to work with Unite Hospitality regularly to ensure that the voices of workers in venues is reflected in decis</p> | <p>council on 27/10/22. As Scotland’s second largest council this is a positive move towards ensuring the safety of all late night staff leaving their workplace. We would now ask that the licensing board of Edinburgh city council consolidate that motion into their licensing objectives for the next council. We have outlined the key demands of the campaign for the Edinburgh board to consider:</p> <ul style="list-style-type: none"> ·Many industries which make Edinburgh thrive – including hospitality, health and social care, and cleaning – depend on shift work which can often entail late-night working. ·These are sectors which predominantly employ women, and many workers are increasingly worried about their safety travelling to and from work at night; ·Both employers and decision makers have a duty of care towards workers in Edinburgh, which does not end when an employee finishes their shift but need to take into consideration journeys home, especially during unsocial hours; ·Unite the union’s ‘Get Me Home Safely’ campaign calls on employers to take all reasonable steps to ensure workers are able to get home safely from work at night, ·Last year, East Dunbartonshire Council adopted a Supplementary Statement of Licensing Policy meaning that Hospitality venues in East Dunbartonshire will now have to ensure their employees can safely travel to and from work late at night, or risk losing their licence. <p>And therefore council:</p> |
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LICENSING BOARD CONSULTATION – LICENSING HOURS

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| | | | <p>-Fully supports Unite the union’s ‘Get Me Home Safely’ campaign -Instructs relevant officers in Licensing, Transport and Community Safety to design an implementation plan to meet the aims of this campaign including: -Adopting of a policy to ensure that the approval of late-night licences will be contingent on employers funding safe transport home for their shift workers, thereby ensuring that workers don’t face additional financial penalties or risk for undertaking late night shifts; -Engaging with Lothian buses and Edinburgh trams regarding the provision of better nighttime public transport services which links with the needs of shift workers; -Using Edinburgh Council’s voice on regional and national bodies to advocate for any additional legislative changes, for example around private car hire use and taxable benefits, which may be required to ensure that our city’s workers are able to travel home safely without incurring additional costs.</p> |
| Individual | | <p>Access to safe travel after work to get home, especially during winter; minimising harrassment people experience when customers are drunk and leaving in the early hours of the morning; employers paying for safe travel after work/it being enforced as a necessity; pay which reflects the unsocial hours (again enorced as a necessity)</p> | <p>I would like to see it explicitly stated thta employers have to provide access to safe travel or the money and services for this, as well as explicitly stated that employers should grant pay which reflects the unsocial hours, regardless of whether you're on a zero hours contract or not.</p> |

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| Individual | | Board should have more flexibility to restrict hours where the premises is near to residential property or where the premises have caused problems for the public | There should not be any entitlement for a premises to open after 11pm without consideration of the particular premises. That includes the extended festival licence. |
| Individual | Not much, the restricted licensing hours impact the night time economy by forcing businesses to close at 1am or 3am. 10pm outside drinking restrictions forces customers away too. | -Allow bars/cafes/restaurants to sell alcohol on Sundays before 11am inline with Mon-Sat rules -2am closure for pubs, 4am closure for clubs inline more inline with european culture -Allowing outside drinking after 10pm if businesses aren't in residential areas | |
| Individual | All works well | Flexibility for short term applications | More conditions |
| Individual | The restrictions on selling alcohol after a certain time is positive as for residential properties near licensed properties get an end time | I'd like to see the restrictions to selling alcohol in the morning removed from off licences supermarkets etc. Allow the retailer's to sell alcohol any time they are open. | |
| Organisation Scottish Grocers' Federation | As noted in Section 11.6 of the current Licensing Policy, the Licensing (Scotland) Act 2005 sets out the maximum permitted hours for off sales type premises are 10am to 10pm, each day of the week. SGF supports this policy on licensed hours. Retailers are used to the current licensed hours and so SGF would not want to | SGF would not support any reduction to the available licensed hours. Convenience stores are community assets which offer key services to local communities. Our members are responsible retailers and they put considerable effort into ensuring that alcohol is sold in a responsible way. 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 | |

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| | see them changed. Also, SGF would not support any reduction to the available licensed hours as we believe there would be no evidential basis for such a decision and would also leave applicants for new stores at a disadvantage. There is not, in the SGF's view, any evidence to suggest that alcohol purchased later in the day is more harmful than purchased earlier or vice versa. | 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. | |
| Individual | Contained time | Earlier closing | More concern given to licensing in residential areas |
| Individual | Leave it alone | Leave it alone | Nothing |
| Individual | No issues but trade is becoming earlier since covid.. | Children in pubs without having to have a substantial meal . This is a very dated and out of touch rule which all our tourists do not understand. Move with the times please. | As above |
| Individual | Long, flexible hours allow establishments to serve their communities | The blanket rule preventing premises serving customers outside after 10pm should be revised. It's daft that - on the three nights a year where it's warm enough in Edinburgh that you might like to socialise outside a venue - you're not allowed to because of an ill-advised blanket rule | Multiple choice buttons instead of text fields |

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| <p>Organisation NTBCC Licensing</p> | | <p>We feel that licensed hours should be tailored - specifically for new premises, based on:</p> <ul style="list-style-type: none"> i/ whether they are in a designated overprovision locality *AND* the presumption against grant was successfully rebutted; ii/ how close they are to residential areas, or the main dispersal routes to these. <p>When in doubt, we would recommend granting reduced/restricted hours for a minimal 'trial' period (e.g. 12 months?) during which compliance levels with the five licensing objectives could be assessed. Longer hours could be considered thereafter, as part of a better informed decision.</p> <p>Further, we feel that premises would be best categorised, so as to make it clearer what their primary use is - i.e. restaurant, public house, nightclub etc.? We understand that categorisation used to be a requirement as part of previous Board's policy, therefore we would ask for it to be re-introduced.</p> <p>As an extension to that, we would welcome better clarity as to what opening/terminal hours apply for what type of premises under section 11.6 – e.g. "licensed premises offering restaurant facilities" would suggest ancillary</p> | <p>Flexibility for the Board or LSOs to restrict hours where premises persistently fail to comply with any of the licensing objectives.</p> |
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| | | restaurant facilities, which we would interpret as subject to maximum terminal hour of 3am; as opposed to licensed premises primarily operating as a restaurant, which we would interpret as falling under "licensed premises" instead, therefore subject to maximum terminal hour of 1am. | |
| Individual | Not a lot really. We are being treated like infants who cannot control how we handle our own alcohol consumption | Hours. Mainly shops. During lockdown we were advised to go to the shops once a day and I shop in the morning. It occurred why can't we buy alcohol when the shop is open rather than the time of day. Surely it should not matter. Oh and not able to buy alcohol free drinks out of ours is as absurd as it is typing it | Increased retail hours. Of the shop has a licence to sell alcohol if the shop is open it should be able to sell it |
| Organisation Equally Safe Edinburgh Committee (Vice Chair) (employed as CEO of Edinburgh Women's Aid) | The ESEC has no comment on this question. | "In section 22.6, there is a clause around the operation of CCTV cameras requiring that they remain on for at least 30 minutes following the closure of licensed premises. For the prevention and identification of crime and disorder, as well as to protect women and other vulnerable citizens in the nighttime economy, we would like to highlight the need for the following: - CCTV within premises that operates 24 hours per day, 7 days per week - Clear and visible signage highlighting that CCTV is in operation on the premises and that footage can, and | The ESEC would recommend the limiting of the hours during which alcohol can be purchased in off-license premises. There are clear links between alcohol consumption by men and violent crime, as well as increased rates of domestic abuse and sexual violence (VAWG Priority 4: Harmful Substances. Link: https://bit.ly/3F7M80k) Public Health Scotland recommends the restriction in the hours during which alcohol can be purchased in off-licenses as a means of preventing VAWG and consequently improving public health and reducing crime and disorder. It is also necessary to highlight the importance of restricting the sale of alcohol to people who appear already inebriated to varying degrees. This is already a rule for licensed premises, however there are doubts as to whether and how this is enforced in off-license stores. |

LICENSING BOARD CONSULTATION – LICENSING HOURS

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| | | <p>will be used to investigate reports of crime on the premises</p> <ul style="list-style-type: none"> - Training for licensed premises staff on the use of CCTV-in particular, ensuring that at least one staff member trained on how to view and copy CCTV footage is on the premises daily, and able to attend a call by Police Scotland when called. This would ensure that any investigations are not limited by premises' opening hours and that there can be a swift and effective response to any incidents of Violence Against Women and Girls (VAWG) that involve antisocial behaviour and drunkenness." | |
| Individual | NA | <p>Opening hours could be longer for Off - sales. It's alienating to tourists and an inconvenience to most law-abiding citizens.</p> | <p>11.4 makes reference to one measure that could be used. Are there any others? It feels like this is the only measure that is ever given an example. I think other measures should be highlighted and that used as a last resort.</p> |
| Individual | | <p>As a nation, Scotland has some of the highest rates of alcohol abuse in Europe. Much greater consideration should be taken of not only the police, but also public health experts. There is not a need for extended hours of alcohol sales to entertainment establishments or casinos. Alcohol sales should end throughout the city at a reasonable hour, regardless of premise, 1am is more than late enough.</p> | |

LICENSING BOARD CONSULTATION – OCCASIONAL LICENCES

| Are you responding as an individual or as an organisation? (Name of organisation) | What works well with temporary licensing? | What could be improved upon? | What else would you like to see included under this section in the updated policy? |
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| Organisation GRASS (Grassmarket Residents' Association) | See my response to a previous section. | Temporary licences should only be granted for smaller and community orientated events. | |
| Individual | Not a lot in the experience of witnesses to Hill Place Drummond Street Roxburgh Place Bristo Square Especially outdoor activities | Temporary license arrangements are sometimes highly Unethical There should be better comparison to how the activities affect communities Before any approval There should actually be zero negative impact on quality of life for persons residing nearby And if the temporary license arrangements worked well That would be more ethical | More stipulation that venues who have been Perverting the course of justice and intimidating behaviour towards anyone who raised concerns about their standards be banned from causing any IE any further harm to lives of people who live in an area |
| Individual | Nothing | Nothing | Nothing |
| Individual | I don't agree. Like mentioned less alcohol consumption would be better, not more. | Reduce the amount of licensing significantly. | |
| Individual | Nothing Those who do the applications would already be responsible and the rest dont | Vetting is poor Venues abuse the occasional | |
| Individual | Little - it is effectively a free-for-all as currently applied. | These need to be further restricted to stop the constant flow of temporary venues causing disruption to residents and local businesses and flouting conditions that are applicable to year round, rate paying businesses. Something is patently not "temporary" if there is no associated restriction on use. | A clear statement that if these are to continue to be allowed there are to be for short period (the duration of the festival or Xmas is NOT short) and it should be limited to twice per year (as anything more than this is NOT temporary). |

LICENSING BOARD CONSULTATION – OCCASIONAL LICENCES

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| Organisation Leith Pubwatch | | Pop up bars in town are too easily exploited by non-local businesses. Those external operators damage local businesses and the money leaves the town. There is no way a handful of LSOs can control or manage these operators. Unless a Pop up bar is constrained to a local sustainable business, it should have it's license granted. | |
| Individual | It works well currently. I am part of a voluntary organisation that applies for occasional licenses. It is simple to do and clear to understand the requirements. | Happy as is | happy as is |
| Individual | Na | Na | Na |
| Individual | Nothing much. Temporary licencing has not faired well for the city regardless of size of contract. it is plain to see that there is a great deal of disdain placed on the winter festival due to the promoter and a great deal of questions about the lack on safeguards in granting them a licence. There are also pop up bars and the like that have temporary licences which serve to drive money out of the local economy unlike well established local businesses. | | A reduction in licences for pop up establishments. A robust overhaul of the system that awards contracts for large festivals that dominate the city and potentially a dividing of these contracts to increase competition, but also so that they cannot dominate large swathes of the city ostracising those that live there. |
| Individual | flexibility and able to obtain quickly | Too better consider the effects of temporary licences on those affected by them and in particular those permanent businesses that pay rates and employ people all year round | |
| Individual | Opposed to the issuing of unlimited temp licences. Unfair to established premises with full licences and scrutiny | | |

LICENSING BOARD CONSULTATION – OCCASIONAL LICENCES

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| Individual | It lets pop-ups and festival venues operate. | Nothing, I think it's fine. | |
| Organisation Craigentinny and Meadowbank Community Council | Lots of temporary pop ups can come and go in short notice | A quick resolution to temp licensed needs reviewed. Currently a permanent licence can be up in front of the board in a matter of weeks but a temporary license can infringe the laws and be closed and gone before being pulled up in front of a board. | More stringent rules against temp premises as opposed to permanent ones |
| Individual | | | |
| Individual | | | |
| Individual | When it's allowed | Letting more happen | More bars going for extensions for such things as American football or boxing event's |
| Individual | Good for Fringe and similar pop-up events | Don't know | Nothing |
| Organisation Edinburgh Sovereign Council No1 | We only meet on an occasional basis 4 times per year and the licence covers the sale of alcohol for consumption by our membership (not open to the public) at a formal dinner held after each meeting. I believe we meet the type of criteria that temporary or occasional licensing was designed to cater for. eg Club or Society | | |
| Individual | I'm happy with the current provision of 'pop-up' bars and festivals during the Summer months in particular. I think it's a benefit to the city to be able to enjoy time outdoors during the warmer weather and the extra venues make this possible. I can also see the benefit to businesses which aren't bars/restaurants, for example, in being able to hold one-off events which provide alcohol. | | |
| Individual | I love the open-air pop-up bars that appear during the Fringe. | Allow more temporary outdoor bars in June and July, not just August. | A more liberal policy in general |

LICENSING BOARD CONSULTATION – OCCASIONAL LICENCES

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| Individual | Pop up bars Festival Venues | More awareness | |
| Individual | | More consideration should be given to the impact of extended hours on residents, the aesthetics (eg tacky short-term outdoor spaces) and other businesses in the area. | |
| Individual | Allows for pop up bars and clubs extending the range of premises available at any given time | Make it easier to get temporary licenses | |
| Individual | Being able to allow events that bring money to the area | Everything | Everything |
| Individual | The TTF gig going ahead at Ingliston. It is not a “rave” these guys have their own audience and there has never been any drug related issues at any of their gigs, or anything related just one big family coming together and you have upped the rug from under them 3 weeks before. Ridiculous! They are being used as scape goats. | The TTF gig going ahead at Ingliston. It is not a “rave” these guys have their own audience and there has never been any drug related issues at any of their gigs, or anything related just one big family coming together and you have upped the rug from under them 3 weeks before. Ridiculous! They are being used as scape goats. | The TTF gig going ahead at Ingliston. It is not a “rave” these guys have their own audience and there has never been any drug related issues at any of their gigs, or anything related just one big family coming together and you have upped the rug from under them 3 weeks before. Ridiculous! They are being used as scape goats. |
| Individual | Nothing - | These licenses should come with a fee to include a contribution to business rates. And should be limited to stop operators taking advantage of footfall areas at the expense of rate paying businesses. | |
| Individual | The flexibility of current practice in the context of Edinburgh as a major 'events' venue. | As expressed above, my guess is that there is a lot of pressure by way of 'shortened timescale' 'exceptional reason' requests, as the trade looks to game the system. There has to be pushback against 'artificial' claims of exceptionality. | |
| Individual | Putting on an event that you want a license for as a special occasion such as a theatre show, charity fundraiser or the like works | Temporary licenses need policed more and given special conditions to LSO's in order to have closures or fines at a quicker pace than there is now. For instance, in the past | A robust policy of checking people such as a police background CTC check to stop unsavoury characters from opening up temporary licensed venues. |

LICENSING BOARD CONSULTATION – OCCASIONAL LICENCES

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| | very well being attributed to the license holder and not a venue anymore. | if the meadows festival that was up for two days caused huge amounts of noise complaints over a weekend and had drunk people causing havoc, by the time the LSO's could do anything regarding the license, or meeting with the board the event would be done with no punishment being eked out. If a nearby pub such as the Pear Tree had done the exact same over the weekend, the pub would be up for review and having to put new policies in place. This is unfair and temporary licenses need their own amendment including instant revoke of license and closure. | |
| Individual | Ability to innovate, test or hold events. | | |
| Individual | Flexibility. Improved Revenue raising for fetes, markets, etc. Shows Edinburgh to be a progressive city. Allows businesses to thrive based upon providing these services on a roaming basis. E.g. A brewery could open short term popups or provide a stall at markets. | | |
| Individual | | Temporary licences should not be made available for short periods without making a specific application, which should not be automatically granted. | |
| Individual | | Like extended hours, temporary licencing seems to be mainly used during peak season only. | |
| Individual | Price is affordable | Notice period should be longer to allow for comments from consultees | Further conditions to be added related to safety and compliance |
| Individual | Na | Na | Na |
| Individual | The council leaving it alone | The council leaving it alone | No council changes |

LICENSING BOARD CONSULTATION – OCCASIONAL LICENCES

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| Individual | | Reduced time for applications to be processed for one-off events, particularly where the venue has been awarded these previously. | |
| Organisation NTBCC Licensing | | There should be a limit to the number of occasional licences that can be applied for temporary licensing within a year, at a given address - enough to cover the Festival/Fringe and Festive season, typically - unless the occasional licences are to allow trading under a provisional licence. | |
| Individual | N/a | N/a | N/a |
| Individual | | There are too many pop-up bars during the festival period, adding to the impression that the festival is a huge business run by outsiders to the detriment of the people of Edinburgh. | |
| Organisation Equally Safe Edinburgh Committee (Vice Chair) (employed as CEO of Edinburgh Women's Aid) | The ESEC has no comment on this question. | The ESEC has made comments on this under the final question (Q20) | The ESEC has made comments on this under the final question (Q20) |
| Individual | It seems ok. | Information about why certain conditions have been added to the license. | A rationale about why conditions have been added to the license. |

LICENSING BOARD CONSULTATION – OTHER COMMENTS

| Are you responding as an individual or as an organisation? | Name of organisation | Please provide any other comments you have about the current policy |
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| Organisation | GRASS (Grassmarket Residents' Association) | It needs to be more transparent and applied effectively. |
| Individual | | The current policy must be looked at on the basis that Drinking responsibly is vital Students are susceptible to alteration of habits based on your decision making processes Community inequalities are improved or WORSENING based on your decision making processes Our community experience is an appalling catalogue of failure to address concerns raised timely Failure to mitigate worsening Environment Community Safety Standards and Quality of Life for Residents Rights spanning over a decade There needs to be PROTECTION FOR witnesses And Mitigate harm |
| Individual | | Stricter regulations for nightclubs |
| Individual | | We want to make our planet clean and healthy. Let's also concentrate on making humans and future generations clean and healthy too! |
| Individual | | There needs to be clear steps for dealing with breaches. |
| Individual | | The restriction on buying alcohol in shops before 10am is ridiculous. |
| Organisation | Leith Pubwatch | Not remotely business focused enough. Edinburgh is full of net curtain twitchers and the same inane objections from self-righteous "residents groups" slow up the court process. Planning is so overwhelmed no development happens anymore and there is no incentive to be creative. Take one look at the shuttered embarrassment that is Princes Street Edinburgh, Union Street Aberdeen and see where this stifling bureaucracy has got us. |
| Individual | | Sadly the policy cannot be extended to oblige a business to trade as that would require a change to primary legislation |
| Individual | | Adult entertainment venues should be licensed, not limited to 0 licenses. Doing otherwise drives it underground and/or puts people out of work. |
| Organisation | Craigentiny and Meadowbank Community Council | The whole policy seems to be working but temporary licensing needs looked at |
| Individual | | I have noticed a number of premises where the smallest measure of wine which can be purchased is 150 or maybe even 175ml - this is overselling for greed and encourages over consumption. Also in times of belt tightening it is unaffordable for many. We need standard measures being forced to be available, 125ml, 175ml - that's it! The 250ml should be scrapped |

LICENSING BOARD CONSULTATION – OTHER COMMENTS

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| | | for the above reasons, and as an aside anyone served a 175 or 250 of white wine - it will be warm beyond enjoyment if drunk at a reasonable speed for enjoyment rather than for effect. |
| Individual | | Current policy isn't fit for purpose in a capital city. We need more late licencing especially for restaurants and nightclubs |
| Individual | | I think the police have to be given powers and in force them to be able to confiscate people drinking on the streets and where appropriate issue fines |
| Individual | | Fairly happy generally |
| Organisation | Edinburgh Sovereign Council No1 | As a club or society I find the current policy adequate for our needs i.e. 4 meetings per year. It keeps us within the law and although the application form could be simplified it is a reasonably simple process once you become familiar with it. I do recognise there is some controversy re the misuse of occasional and temporary licences, but I believe we are well within the criteria and are the type of organisation that occasional licensing was designed to facilitate. EG genuine short term occasional licensing to allow serving and sale of alcohol in a closed group not open to the public. Hopefully this facility will remain available or catered for in any future policy changes. |
| Individual | | Current policy is outdated, unnecessarily puritanical and caters too much to the snobby anti-fun brigade. Edinburgh is a thriving modern city welcoming visitors from all over the world. We need a vibrant, varied and inclusive spread of pubs, clubs, and music venues to match. |
| Individual | | There ought to be more engagement with locals impacted on the decisions being made. |
| Individual | | Uber and council could make things a lot easier. |
| Individual | | You use the policy to suit whatever you want not what's good for the general public. Small minded Individuals ruining peoples fun |
| Individual | | The TTF gig going ahead at Ingliston. It is not a "rave" these guys have their own audience and there has never been any drug related issues at any of their gigs, or anything related just one big family coming together and you have upped the rug from under them 3 weeks before. Ridiculous! They are being used as scape goats. |
| Individual | | It doesn't work very well. Difficult to find right person to talk to about complaints; limited (if any) genuine consultation with residents about licencing new premises or continuing existing ones which are problematic. |
| Individual | | Off-sales to / finding their way to Minors are the hole below the waterline. The present policy is struggling to contain the challenge. If policing (small 'p') breaches is the problem, then the penalties for breach need to be higher. Over-Provision s. 8.8 - This sums up the nub of the problem. The 'social / community cost' is 'high' and the 'trade' (I would think') goes nowhere |

LICENSING BOARD CONSULTATION – OTHER COMMENTS

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| | | near to meeting a fair share of the burden - a burden borne by the police, NHS staff and CEC street workers 'on the front line'. This goes beyond Edinburgh itself. There needs to be a wider conversation on the cost - benefit of 'loosely fettered' alcohol provision. |
| Individual | | 24hour opening across the board |
| Organisation | Unite The Union | The guiding principal of the Get me home safely campaign is that every worker must have access to safe transport at all hours of the day and we want employers, local authorities to engage with our union to develop solutions for ensuring workers who work past 11pm are able to travel to and from work safely. This campaign developed by workers for workers is part of our collective response to address gender based violence in the workplace and in the wider community. Privatisation and corporate greed should never trump worker safety. Employers must have a duty of care to ensure workers are able to get home safely from work at night. |
| Individual | | Imperative to strike a balance between the local economy and need for people to get out and socialise, and the needs of residents and to minimise alcohol related crime. Pubs are critically important community assets, especially for those who are otherwise lonely. |
| Individual | | The Licensing officers should be given the authority to close a premises or restrict their hours immediately without requiring consent from the Board. The premises can then go to the Board to request their licence be reinstated, and this could be done if the premises can demonstrate what changes they will make to run their premises better. The current process is far too slow allowing a premises to continue to be a nuisance for months before any effective action is taken. The audible noise condition needs to be reinstated in some form. The onus on the public to demonstrate nuisance is totally unreasonable. |
| Individual | | Would be good if adults could be treated as adults when enjoying a night out, and maybe allow businesses to operate as they want to so long as staff (security etc) is in place. Being forced out a pub at 1am for no reason is very outdated especially for a modern vibrant city like Edinburgh. |
| Individual | | Venues to be conditioned in relation to safety and CT training as per recommendations from Manchester Inquiry. Higher capacity venues (approx 800 depending on Protect Duty final position) should also consider external measures to protect customers entering and exiting their premises A limit to the number of occasional licences should be considered. Should a venue be able to run for years only using occasional? |
| Organisation | Scottish Grocers' Federation | 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 |

LICENSING BOARD CONSULTATION – OTHER COMMENTS

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| | | <p>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.</p> <p>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.</p> <p>Any proposed changes to the current Licensing Policy, which could affect the viability of local convenience stores, should acknowledge those factors and any additional burdens into account.</p> <p>Section 12.4, CCTV. SGF believes that the current Policy is adequate. SGF works with its membership and the convenience sector as a whole to ensure that they are fully compliant with licensing legislation and are selling alcohol responsibly. It is already the case that all off-sales premises must have a compliant CCTV system in place.</p> <p>Section 17.3, Home Deliveries which include online purchases of alcohol. The increased use of apps and the use of third-party delivery agents allows convenience stores to offer another important and valued facility for customers. The SGF Local Shop Report highlights that 26% of convenience stores offer some form of grocery delivery, providing an important service to their communities.</p> <p>SGF members use these facilities responsibly and have strict measures, such as record keeping and age verification in place, to ensure the rules around delivery are observed.</p> |
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LICENSING BOARD CONSULTATION – OTHER COMMENTS

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| | | <p>Drivers are trained to -</p> <ol style="list-style-type: none"> 1. Always hand over alcohol to an adult. 2. If no adult able to accept deliver then return all goods back to shop. 3. Never leave items on the doorstep. <p>SGF members have reported that they ban any household where they suspect underage sales maybe taking place and go out of the way to ensure they abide by the regulation.</p> <p>SGF welcomes the opportunity to contribute to the consultation exercise. We trust that you will find our comments helpful.</p> |
| Individual | | Everything this council touched turns into a mess. Leave it alone |
| Individual | | Children's policy and pop up bars need reviewing. |
| Individual | | Allow certain premises to serve outdoors under appropriate conditions later than 10pm. Introduce and commit to enforcing an Agent of Change policy. |
| Organisation | NTBCC | <p>Public information -----</p> <p>We feel the Board is failing in its duties by supplying insufficient information to the public on liquor licences close to people's homes. The majority of people are completely unaware of variations to existing licences when they are made, as the notification process is not fit for purpose - i.e. limited to 4m radius! We would welcome an attempt from the Board to go beyond the minimum legal requirement here.</p> <p>Noise complaints -----</p> <p>We feel that the procedure for making noise complaints could be clearer. Not just a phone number, but an explanation of the process, the hours of operation of the noise team, and how the complaint will be managed by the Council.</p> <p>Amplified music -----</p> |

LICENSING BOARD CONSULTATION – OTHER COMMENTS

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| | | <p>Section 7.2, where it says "the Board will always consider the imposition of a condition requiring amplified music from those premises shall not be an audible nuisance in neighbouring residential premises." We find that "shall not be an audible nuisance" is highly subjective, and would recommend for the wording to be replaced with "to be inaudible".</p> <p>Late licences ----- We would welcome a condition for licensed premises to clear glasses and other discarded items (incl. packaging and food from takeaway outlets) within say 20m of their premises upon closing.</p> <p>Operating plans ----- We would welcome some clarity on expectations with regards to queue management outside premises, specifically so as to ensure that numbers don't detrimentally impact neighbouring residential amenity.</p> <p>Dispersal from premises ----- A fact that perhaps licensed trades fail to appreciate is that the impact on local community amenity - i.e. not limited to residents - can be the greatest through (en masse) dispersion from licensed premises. This is particularly true within designated overprovision localities, where the higher density of licensed premises &/or their capacity, routinely lead to a number of patrons making themselves known through noise, smoking and the trail of mess that they leave behind them. While premises tend to be pretty good at controlling their operations, they might fail to appreciate (or choose to ignore) in our view the cumulative impact that an increase in licensed outlet density, capacity or terminal hours can have on local communities... but also the police, health services and charities who end up dealing with some of the messy aftermath of the night time economy. We'd welcome suggestions from the trade as to what might best help improve that 'social' aspect.</p> |
| Individual | | <p>I strongly object to the council's policy of threatening to withdraw licences of pubs who host musical performances. I am aware of many bars, including my local, that no longer host bands</p> |

LICENSING BOARD CONSULTATION – OTHER COMMENTS

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| | | <p>due to vexatious complaints from neighbours. This does not happen in Glasgow, which has a great homegrown music scene as a result.</p> <p>Pubs are the breeding ground for bands, and it's a difficult enough time for working class artists without the destruction of the local live music circuit.</p> <p>It seems that for Edinburgh CC, culture is something to be imported from England once a year.</p> |
| <p>Organisation</p> | <p>Equally Safe Edinburgh Committee (Vice Chair) (employed as CEO of Edinburgh Women's Aid)</p> | <p>The Equally Safe Edinburgh Committee (ESEC) is a partnership of organisations and services in the statutory and voluntary sector. We work together to ensure the implementation of Equally Safe: Scotland's Strategy to prevent and eradicate violence against women and girls (VAWG). Equally Safe has four key strategic priorities:</p> <ol style="list-style-type: none"> 1. Scottish society embraces equality and mutual respect and rejects all forms of VAWG 2. Women and girls thrive as equal citizens – socially, culturally, economically and politically 3. Interventions are early and effective, preventing violence and maximising the safety and wellbeing of women, children and young people 4. Men desist from all forms of VAWG, and perpetrators of such violence receive a robust and effective response. <p>Equally Safe defines VAWG as, among others:</p> <ul style="list-style-type: none"> » physical, sexual and psychological violence occurring in the family (including children and young people), within the general community or in institutions, including domestic abuse, rape, and incest; » sexual harassment, bullying and intimidation in any public or private space, including work; » commercial sexual exploitation, including prostitution, lap dancing, stripping, pornography and trafficking; <p>Together with the Edinburgh Adult Protection Committee and the Edinburgh Child Protection Committee, the Equally Safe Edinburgh Committee make up the Edinburgh Public Protection Committees. As such, we would like to make specific recommendations running throughout the current licensing policy.</p> |

LICENSING BOARD CONSULTATION – OTHER COMMENTS

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| | | <p>Our committee is currently leading the Women’s Safety in Public Places Community Improvement Partnership (WSPP CIP) which is concerned with implementing actions that can help women and girls stay safe in public spaces. The safety of women and girls in the hospitality industry and in the nighttime economy is of considerable concern to us. As providers of services to women affected by violence and abuse, we are consistently made aware of behaviours that constitute violations of women’s rights in licensed premises, and by extension, a violation of public safety.</p> <p>Firstly, we believe that the key objectives of the licensing policy should either explicitly make mention of the prevention of violence against women and girls, or measures to reduce violence against women and girls in licensed premises and the nighttime economy more widely should be more explicitly mentioned throughout the policy. We believe that there are considerations that have not been included in the policy which are absolutely essential to prevent VAWG, and which must also be viewed as wider measures to furthering the objectives of the policy. Specifically:</p> <ul style="list-style-type: none">- The responsibilities of license holders in preventing crime and disorder should extend to VAWG, which should include sexual assault inside or in the immediate vicinity of their premises (for example sexual assault or attempted rape) sexual harassment (for example catcalling) or other forms of sexual intimidation against women and girls (for example threats of sexual assault and rape). This should include training for staff (including security staff) and a responsibility to intervene during an incident or potential escalating incident, with evidence of inaction recorded for license reviews.- Clause 22.4 must specifically include VAWG as a key factor impacting on crime and disorder, and it must recognise that some of the behaviours described (for example drunkenness, violent behaviour, use of drugs) are significant contributors to VAWG both on and off licensed premises. The responsibilities of license holders in preventing such crimes must be clarified and strengthened and they must be made aware of the role they have to play in preventing VAWG, while also being held accountable for potentially permitting such behaviours within their premises and in their immediate vicinity.- Within clause 22.4, we would also like to highlight that there are existing measures which can easily be adopted and which can be conditions for the licensing of any premises: |
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LICENSING BOARD CONSULTATION – OTHER COMMENTS

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| | | <p>1. All license holders and staff members they employ (including hospitality staff, security staff, cleaners, etc.) to be required to undertake Active Bystander training to empower them to intervene where they see or suspect VAWG occurring in licensed premises.</p> <p>2. The Ask for Angela scheme to become a license condition, for all staff employed to be trained on how to respond, and for the scheme to be widely publicised within licensed venues. The Ask for Angela scheme effectively allows any customer who may be experiencing threats, harassment or abuse at a licensed premises to approach any member of staff and ‘ask for Angela’. This is a signal to staff to call a taxi and to support the customer to exit the premises and to leave safely in the taxi.</p> <p>3. Further, drink spiking has been highlighted in particular as a concern following the re-opening of the nighttime industry following the covid 19 pandemic. This has been an issue of concern particularly for students from the University of Edinburgh who felt compelled to create a short film highlighting this issue (link here: https://bit.ly/3gVtq45) There are simple, and easy measures that licensed premises can make to address the risk of drink spiking, for example through DrinkSafe testing kits or ‘Stoptopps’. Effective prevention of drink spiking should be included as a license condition for all applications to be granted.</p> <p>4. The ongoing training of security staff to prevent VAWG must also be made a condition of any license. The ESEC has been made aware through its partners of numerous occasions where, particularly security staff and door staff have been not only unhelpful to vulnerable women, but have actually placed them at higher risk of abuse and violence. On a number of occasions, we have been informed of women who were removed from nightclubs in an inebriated state only to be thrown outside the premises barely covered by their clothes. This is a blatant example of license holders and security staff not upholding the conditions of their license and actively increasing risk to a vulnerable person.</p> <p>The policy framework that supports our work includes the VAWG priority papers published by Public Health Scotland in March 2022 (link: https://bit.ly/3F7M80k). Three of the six papers are particularly relevant to the Licensing Policy Consultation, especially Priority 4: Harmful Substances.</p> <p>In terms of the safety of women as far as alcohol use is concerned, the Priority 4 paper clearly states that ‘Policy interventions to reduce the consumption of alcohol can lead to a reduction in the perpetration of VAWG’ (p.5) The paper adds that alcohol and drugs are often linked</p> |
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LICENSING BOARD CONSULTATION – OTHER COMMENTS

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| | | with violent crime, women experience alcohol-related violence disproportionately, and heavy alcohol use in men is linked to higher perpetration of physical and sexual violence. There are also known links between the consumption of alcohol and drugs in women and selling or exchanging sex. The paper recommends policy interventions that include the reduction of the density of off-licenses in local areas and restricting the hours in which alcohol can be sold. |
| Organisation | Tollcross Community Council | <p>In September 2016 the amplified music clause was changed from "All amplified music and vocals shall be so controlled as to be inaudible in neighbouring residential premises" to "All amplified music and vocals shall be so controlled so as not to be an audible nuisance in neighbouring residential premises".</p> <p>The Licensing Board established in 2017 agreed that an evaluation and review of the policy would be undertaken within the tenure of that Board. The results of that review should be published and, in particular, as the change to the wording of the clause was prompted by an assertion that there was a dearth of music venues in Edinburgh because of licensees' reluctance to allow music performances under the terms of the original version, it would be useful to know the relevant numbers of licensed premises offering music performances under the respective versions of the music clause before and after the introduction of the new version.</p> <p>We believe that, in the interests of residential amenity, in the case of licensed premises located in residential tenement buildings the former version of the clause should always be applied and not the revised version.</p> |
| Individual | | The policy seems to work well. It would be interesting to see what parts they are looking to change. I think it's important to seek advice and information from a large as possible cross-section of the population. Including tourist bodies. The policy shouldn't just focus on the here and now but also the future of the city and its place in the country and the world. |

LICENSING BOARD CONSULTATION - OVERPROVISION

| Are you responding as an individual or as an organisation? (Name of organisation) | What works well with the approach to overprovision in the current policy? | What could be improved upon? | What else would you like to see included under this section in the updated policy? |
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| Organisation GRASS (Grassmarket Residents' Association) | Nothing as it is not always implemented. Some new licences or applications for extensions seem to slip under the net altogether despite the Grassmarket and the Old Town generally being declared an area of over-provision at a previous review. This policy must have teeth and be implemented without exceptions, | | |
| Individual | Overprovision needs more clarity | Areas of overprovision are many The outside amplifiers for example Pear Tree Three Sisters Should be reviewed The busy roads might mitigate but residents rights are frequently bypassed Signage is not always Appropriate Clattering of bottles is significant | That the impact on a community should be mitigated |
| Individual | Nothing | Less venues | Limits of venues allowed opened in a street |
| Individual | Wherever there are licensed premises in less affluent areas it seems to become a hotbed for drug dealing and antisocial behaviour, more affluent areas less so. | Remove licenses from less affluent areas completely. | |
| Individual | | An acknowledgement that actually it's a good thing to have a concentration of bars where there is really good public transport (eg Tollcross) for safety purposes | |

LICENSING BOARD CONSULTATION - OVERPROVISION

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| Individual | Over provision only applies to those who don't have lawyers to argue the case | Open honest and transparent numbers for areas and streets | |
| Individual | Over provision should be of limited concern to the licensing board. Over provision will govern itself in a commercial sense. | | |
| Individual | Absolutely nothing. | Everything. "Overprovision" is broken and has clearly been discarded in areas such as the Old Town. If this policy is to work then the entire thing needs to be binned and started from scratch to make it workable and to deliver intended outcomes. | Clear definitions and limits otherwise what is the point? |
| Organisation Leith Pubwatch | Nothing works in this section. This section is redundant. In the current and medium term future, nowhere will be overprovisioned. The class licenses are an absolute nonsense and no longer fit for purpose. The overprovisioning section is a particularly distasteful and prejudiced element which needs to be rethought. | Everyone pays by card these days. You don't need these daft wee licenses to harvest petty fees and bizarre taxes. This could all be massively simplified. | |
| Individual | I thin it's fine. As long as established premises which are not directly causing nuisance are left alone then I think the approach is fine. What i mean is you don't want to start shutting places down that are already there if they are not causing | Happy as is | happy as is |

LICENSING BOARD CONSULTATION - OVERPROVISION

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| | issues. OK not to grant new places licences but otherwise leave what's there already alone. | | |
| Individual | Too many places have license past 12am | Bring the license end time forward by 1 hour for all premise... And enjoy the reduction in crime and increased overall productivity of your citizens | |
| Individual | Over provision is not apparent except when it is the festival. | Reduce over provision of pop up venues and large venue providers in the city during festival periods. Instead look to existing provision to provide necessary facility. | Risk assessments based on comfort of local populace. For example a ban on blocking freedom of movement across the centre of the city to accommodate the new year festival. This has little regard to the persons within the city who in order to simply be with loved ones have to traverse through dark and potentially dangerous areas solely to satisfy an overly large street party. It has also been apparent it has been difficult due to such large events for people to even get to their homes, as simple basic human right. As such such events should be under a human rights based approach assessment. |
| Individual | Current policy seems reasonable but no regard paid to under provision of facilities | Be as flexible as possible having careful regard to the particular nature of the business proposed | |
| Individual | | Hard to find any consistent application of current policy | |
| Individual | Nothing much. | It focusses too much on on-sales and not enough on off-sales. Of course the city centre is where most the late night pubs and clubs are, as well as other central areas. People travel to the centre because that's easy. There isn't a city centre in Europe that wouldn't be 'over-provided' on that basis. Meanwhile off sales are continually granted to new supermarkets even though people drinking unsupervised at | A recognition that some places are over-provided for their local population because people travel to them for socialising, entertainment etc. |

LICENSING BOARD CONSULTATION - OVERPROVISION

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| | | home is much worse socially that drinking in licensed premises. | |
| Organisation Craigentiny and Meadowbank Community Council | We don't really see any effect. Even in over provisioned areas new licenses are still being given outm | A review of how many licenses there are and sticking to it. | A maximum number of licenses per ward |
| Individual | | An active review and assessment needs to be done of the provision and number against need of the unfettered spread of tables onto and into pavements in the city centre especially as these are vastly under(un)used the majority of the time. Especially outside the festival period - it makes the place look seedy and rundown. George St may as well not have pavements ditto for the Grass market - if they are not being used they are not needed and the same on the side streets off George St areas built out on raised wooden structures reducing road and pavements and the only use is staff smoking areas when most of the tables both indoors and outdoors are empty the vast majority of the time. | |
| Individual | Local people should be involved directly in those areas where overprovision is deemed a problem. | | |
| Individual | There's no over provision in Edinburgh | We need more flexibility with licenses for late night food outlets to cater for when people leave pubs | More provision. Not less |
| Individual | Don't know anyplace with over-provision | Nothing | Nothing |
| Organisation Edinburgh Sovereign Council No1 | N/A | | |
| Individual | | Personally, I feel it makes more sense to have most licensed premises concentrated in the city centre so I'm not sure of | |

LICENSING BOARD CONSULTATION - OVERPROVISION

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| | | the need for this policy here in particular. I think it should only really be applied in parts of the council area where the character is predominantly residential. | |
| Individual | More and more pubs are going out of business, especially during and after covid. We need more pubs, not less. As far as I'm concerned there is an underprovision. | More pubs. | The real problem is underprovision. This should be addressed. |
| Individual | Nothing | | |
| Individual | | Despite there being a policy on overprovision, it rarely seems to be a factor in decision-making. When making decisions about additional provision in the city centre or areas specified, more details of the decision and factors considered should be spelt out. | A stronger emphasis on limiting provision. |
| Individual | | The current policy could be implemented. | |
| Individual | The TTF gig going ahead at Ingliston. It is not a "rave" these guys have their own audience and there has never been any drug related issues at any of their gigs, or anything related just one big family coming together and you have upped the rug from under them 3 weeks before. Ridiculous! They are being used as scape goats. | The TTF gig going ahead at Ingliston. It is not a "rave" these guys have their own audience and there has never been any drug related issues at any of their gigs, or anything related just one big family coming together and you have upped the rug from under them 3 weeks before. Ridiculous! They are being used as scape goats. | The TTF gig going ahead at Ingliston. It is not a "rave" these guys have their own audience and there has never been any drug related issues at any of their gigs, or anything related just one big family coming together and you have upped the rug from under them 3 weeks before. Ridiculous! They are being used as scape goats. |
| Individual | The city is most definitely at capacity | No licenses should be granted in areas of over provision. Seems to be seeing new venues opening weekly in converted premises. | Transparency on why licenses are being granted. |
| Individual | | Central Old Town has far too many bars and clubs. Completely spoils the area and makes some parts no-go for many. | |

LICENSING BOARD CONSULTATION - OVERPROVISION

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| Individual | If the approach is research- and fact-based, given the right amount of political support, and is promoted as a central measure of 'community welfare protection' then it is working in the right direction. | The Licensing Board is trusted 'to do the right thing' in a crucial area of community social welfare protection. Over-provision is a harder issue to tackle and to gain ground in than under-provision. The Board's efforts would benefit from giving them a (much) higher (PR) profile. | |
| Individual | I don't think it is working well at the moment. With the number of new hotels being built there is surely more licenses being generated adding to the overprovision. A new hotel or pub being built should not be given a license unless one is revoked or a venue closes elsewhere akin to only having a certain amount of taxi licences in a city | A new system whereby there are only a finite number of licenses allowed for any sort of premises and this cannot be gone over. | nothing |
| Individual | Market will deal with over-provision. Should not be Council intervention unless it causes social / disruption issue. | | |
| Individual | | The current overprovision definition needs to be better defined. Overprovision in an area should mean no additional licences are granted. This has not been happening. The St James Centre is an example where numerous licences were granted even before the premises were known. New licences should go into a queue and be granted only when an existing licence is terminated to ensure the provision is meaningful. | |
| Individual | Nothing - it makes absolutely zero sense at all. | Scrapping it. | |

LICENSING BOARD CONSULTATION - OVERPROVISION

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| Individual | No comment | No comment | No comment |
| Individual | | The ideal way of dealing with selling alcohol would be to have dedicated 'bottle shops' no alcohol being sold at all outside these premises but this won't happen so maybe it should only be sold in specialist off licences and supermarkets over a certain size. | What else would you like to see included under this section in the updated policy? |
| Organisation Scottish Grocers' Federation | SGF recognise the Board's duty to assess overprovision under Section 7 of the Licensing (Scotland) Act 2005 in respect of licensed premises or licensed premises of a particular description in any locality within the Board's area. We also recognise that, in determining if there is overprovision, the Board must have regard to the number and capacity of licensed premises in the locality together with any other matter the Board sees fit. | <p>There is no simple cause-and-effect relationship between the number of premises and alcohol-related problems and overall, it is becoming increasingly difficult to make a link between individual premises and problems in a specific locality. Inequality continues to be the main determining factor: alcohol-related harm in Scotland is still disproportionately experienced by those from more deprived areas.</p> <p>SGF believes that an appropriate consideration should be given to each application, as set out in Section 8.5 as follows: "Each application still requires to be determined on its own merits and it remains open to applicants and licence holders to present applications for consideration on their merits, providing evidence in support of their applications..."</p> <p>Case law has shown that a licensing board must base any decision around overprovision in a targeted, evidence-led basis. Decisions from Aberdeen and Dundee have shown that selecting an arbitrary location which is not based on probative evidence would be unlawful. In addition, boards must consider the positive benefits that a thriving local convenience sector can bring to communities, and that evidence should be weighed up as part of the exercise. Our members are responsible retailers and they put</p> | SGF believe that the entire concept of overprovision should be reviewed to consider whether it remains fit for purpose. We live in an age where customers can order alcohol online as part of their shop from a supermarket and have it delivered to their home. This order can be made from anywhere given the prevalence of smartphones. Given this, what does declaring a geographical area as being overprovided for achieve? It would seem arguable that overprovision has not kept up the development of modern technology and consumer shopping habits. For example, a resident may order an online grocery shop, and this could quite legitimately be dispatched from many miles away. |

LICENSING BOARD CONSULTATION - OVERPROVISION

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| | | <p>considerable effort into ensuring that alcohol is sold in a responsible way.</p> <p>In relation to off-sales premises, noted in Section 8.9 of the Policy, SGF recognise the associated benefits that come from a convenience store opening in a local area. A store opening will create jobs and offer access to fruit and vegetables to the local community.</p> <p>Convenience stores provide a range of key services for their customers, and this includes that ability to be able to offer their customers a full range of products, i.e. giving the customer the chance purchase an alcoholic beverage as an accompaniment with home dining. Therefore, a consequence of overprovision is that new entrants to the market are unable to obtain premises licences to authorise the sale of alcohol and are therefore, disadvantaged. The availability of alcohol in a pre-existing competitor store gives the prospective customer a reason to choose to shop there. The convenience element of being able to get their "full basket" from the competitor provides an unfair commercial advantage.</p> | |
| Individual | Too many licensed premises in concentrated areas | Consideration given to license properties and impact on surrounding area | Limitation on license premises in residential areas |
| Individual | Nothing | Nothing | Nothing |
| Individual | Further restrictions on licenced premises are not necessary following the disastrous commercial impacts of the pandemic and brexit. The current arrangements are satisfactory. | Commit to a comprehensive and coherent Agent of Change policy. | Agent of Change |

LICENSING BOARD CONSULTATION - OVERPROVISION

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| <p>Organisation NTBCC Licensing</p> | | <p>We would welcome some evidence that this section carries any (legal) weight? As reflected by the aggregated figures from both the Police Scotland’s Licensing Report 2020-21 that was published as part of the full papers for the Licensing Board meeting on 31st October 2022 and the Licensing Board annual functions reports 2020-21 & 2021-22, the effect that the Board’s current policy has had on overprovision has been NIL overall, in all the designated overprovision localities – i.e. not limited to the First New Town, within NTBCC boundaries. Only 1 application was refused, out of 471 in total for the period 2019 to 2022, across the whole of Edinburgh - i.e. not limited to the designated overprovision localities.</p> | |
| <p>Individual</p> | <p>Not enough licensed premises in Eh14</p> | <p>More premises</p> | <p>Less restrictions</p> |
| <p>Individual</p> | | | |
| <p>Organisation Equally Safe Edinburgh Committee (Vice Chair) (employed as CEO of Edinburgh Women’s Aid)</p> | <p>The ESEC has no comment on this question.</p> | <p>Overprovision can lead to disproportionate crowding of particular areas of the city which can lead to issues, especially where groups of numerous young men congregate. We know that this is a safety factor-both for public safety as well as for the safety of women and girls. In the most recent Women’s Safety in Public Places consultation, women told us that the number and behaviour of men in any given public space is their second biggest safety concern (following lighting levels). Additionally, Clause 8.8 of the policy states that ‘The Board would remain concerned if evidence was presented in connection of a large premises of [...] the views of a significant proportion of the public who avoid areas in the vicinity of large premises because of the fear of crime and disorder’. We need to highlight this within the context of the operation of Sexual Entertainment Venues (SEVs) within the city centre of Edinburgh. Patiniotis and Standing’s</p> | <p>Women have told us in the recent Women’s Safety in Public Places Consultation that the behaviour of men is intimidating, especially when there is public drinking or where men and young people behave in a disorderly fashion following alcohol consumption. We believe that special consideration needs to be given to SEVs whose sole purpose is sexual entertainment, and which are over-represented in the city centre of Edinburgh-especially three SEVs within seconds from each other.</p> |

LICENSING BOARD CONSULTATION - OVERPROVISION

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| | | <p>(2012) findings further provide support to the claim that sexual violence exists in a continuum rather than in isolated incidents. This means that instead of violence and abuse seen as discrete issues in isolation of less violent behaviours such as unwanted comments and ‘catcalling’, they both exist within a continuum of male power and control. Further, participants in the Women’s Safety in Public Places consultation, also highlighted that they feel unsafe around the Grassmarket and the ‘pubic triangle’ specifically due to public drinking, antisocial behaviour, the behaviour of men, littering, poor lighting, the behaviour of young people, and the area’s reputation. When asked to elaborate on the ‘pubic triangle’ specifically, women said that other things that make them feel unsafe in that location include:</p> <ul style="list-style-type: none"> • ‘Strip clubs and those who hang around them’ • ‘Men congregate here to objectivise women. Attend 'performances' to get fired up but not 'satisfied as they would in a brothel.’ • ‘Sexual harassment guaranteed if walking there at night’ • ‘I have been harassed and groped several times in the pubic triangle’ <p>Existing research by the Royal Town Planning Institute (2007)* ‘in certain locations, lap dancing and exotic dancing clubs make women feel threatened and uncomfortable’. Indeed, the Lileth Project reported that in three London boroughs, there was a 50% increase in reported rapes in the vicinity of the clubs, as well as in harassment and fear of violence (Eden, 2007, as cited in Patiniotis and Standing, 2012**).</p> <p>Given the evidence presented above and that women comprise 51% of the population of Edinburgh, we believe it is imperative that the Board considers three SEVs in such</p> | |
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LICENSING BOARD CONSULTATION - OVERPROVISION

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| | | <p>close vicinity an overprovision of Sexual Entertainment which causes women and girls considerable fear and alarm. Although there is a judicial review on the Council’s proposed nil-limit to licenses for sexual entertainment venues (SEVs) from April 2023, should this decision be reversed, there will be a need to define the maximum number of SEVs allowed to operate in the city.</p> <p>REFERENCES: *Royal Town Planning Institute (2007): Gender and Spatial Planning, RTPi Good Practice Note 7; London: Royal Town Planning Institute. ** Patiniotis, J. and Standing, K. (2012): License to cause harm? Sex entertainment venues and women’s sense of safety in inner city centres. Criminal Justice Matters 88(1), pp.10-12.</p> | |
| <p>Organisation Tollcross Community Council</p> | <p>It may be that, once a particular locality is designated an area of overprovision, potential applicants for new premises licenses or for additional capacity in existing licensed premises are deterred from applying.</p> | <p>According to Public Health Scotland's Monitoring and Evaluating Scotland's Alcohol Strategy (MESAS) Monitoring Report 2022, in 2021, 9.4 litres of pure alcohol were sold per adult in Scotland, equivalent to 18.1 units per adult per week (nearly 30% more than the recommended maximum) and 85% of all alcohol sold in Scotland was sold through the off-trade (supermarkets and other off-licences). Clearly Scotland (and presumably Edinburgh too) still has a serious public health problem with alcohol. To support the Licensing Objective of Protecting and Improving Public Health, the Board needs to find a policy approach conducive to reducing the current alcohol consumption level.</p> | <p>It is widely accepted that the only factors that significantly influence levels of alcohol consumption are Price, Availability and to a lesser extent Marketing. Price has already been partly addressed by the Scottish Government's minimum pricing policy. The Board's existing policy of designating specific localities as areas of overprovision may to a small extent be restricting the increase in availability in those areas by discouraging some applications and refusing to grant some (a small number) of those that are submitted but more needs to be done to support the public health objective.</p> <p>We believe that more could be done to reduce what one might call the psychological availability of alcohol,</p> |

LICENSING BOARD CONSULTATION - OVERPROVISION

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| | | | <p>particularly in some off-licensed premises - those where alcohol is sold in the same premises alongside normal domestic consumables.</p> <p>The whole of Edinburgh should be designated as an area of overprovision of such premises (licensed general stores, whether supermarkets or local convenience stores) - effectively requiring that any new or significantly redeveloped licensed general store must partition off the area where alcohol is to be displayed and sold, out of sight behind a closed door with no admission for children or young persons, or, in smaller premises - say those with fewer than four tills - behind cupboard doors (similar to but larger than those used for the sale of tobacco products). Such a policy would gradually reduce the extent to which alcohol is seen, at least subconsciously as "normal" with generations of children being wheeled round licensed general stores, seeing alcohol being displayed & bought alongside food and other normal domestic consumables. Such a policy would also reduce the opportunity for impulse buying of alcohol, at present happily facilitated, if not actively promoted, by the supermarket chains.</p> <p>Although the Board has to assess each licensing application on its own merits, public health is not about individual cases;</p> |
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LICENSING BOARD CONSULTATION - OVERPROVISION

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| | | | so, where overprovision of a type of premises/ with a specific area has been designated in support of the public health licensing objective, exceptions to the presumption not to grant will rarely occur and examples of such exceptions need not be offered within the Board's policy statement. |
| Individual | Seems to work ok. | The link isnt working to the consultation mentioned in 8.2 Do you want to open this link: http://www.edinburgh.gov.uk/meetings/committee/1029/licensing_board? | NA |
| Individual | It is good to see NHS, police and alcohol partnership have been included in this section. It is disappointing that has not happened in other sections. | There should be more localities included in the areas identified as having overprovision, especially new town (George St) and new buildings such as St James Centre (which is in one identified locality: Leith St) yet has had more alcohol licensed premises since being rebuilt. Leith, especially Great Junction St, has significant health concerns and should also be given an extra cautious approach to licenses. | |



City of Edinburgh Alcohol Licensing Policy Consultation
NHS Lothian Response – December 2022

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Introduction

The below response to the City of Edinburgh Alcohol License Policy Review has been produced by the Public Health and Health Policy Directorate of NHS Lothian. Further information or clarification on any points can be sought by contacting Jim Sherval, Public Health Consultant jim.sherval@nhslothian.scot.nhs.uk or Avril Mackay, Strategic Programme Manager Avril.Mackay@nhslothian.scot.nhs.uk

What works well

NHS Lothian recognise and support the five licensing objectives that the license board are required to contribute to. The five objectives referred to being: preventing crime and disorder; securing public safety; preventing public nuisance; protecting and improving public health; and protecting children and young persons from harm. We will continue to support the licensing board and licensing forum particularly in relation to the objectives of protecting and improving public health, and protecting children and young persons from harm.

We continue to value receiving new premises license, or variation, applications and the opportunity to comment, including stating objections, where capacity allows.

What could be improved

To strengthen the board's licensing policy, we feel further links and association with local and national strategy, best practice and use of local data in relation to alcohol consumption and harm would be beneficial.

Link to Strategy and Best Practice

To strengthen the board's licensing policy, further links with national strategy and best practice in the areas of alcohol consumption and harm would be beneficial. This would strengthen the board's support of the licensing objective around protecting and improving harm, identifying how the board considers these strategies during decision making.

It would also further highlight this area to license applicants, which they should consider and respond to more robustly in their application, resulting in a comprehensive discussion about protecting harm in the licensing application review process.

Key policy and best practice guidance that could strengthen the board's license policy could be:

- The World Health Organisation's best buys to reducing the harmful use of alcohol¹
- The Scottish Government's Alcohol Framework²
- The Scottish Government's Public Health Priorities – (PHP4 – A Scotland where we reduce the use and harm from alcohol, tobacco and other drugs)³

¹ <https://apps.who.int/iris/bitstream/handle/10665/259232/WHO-NMH-NVI-17.9-eng.pdf>

² <https://www.gov.scot/publications/alcohol-framework-2018-preventing-harm-next-steps-changing-relationship-alcohol/>

³ <https://www.gov.scot/publications/scotlands-public-health-priorities/>

Taking a Population Approach

We feel the board's licensing policy could be further strengthened by taking a population health approach, which considers the implication for each license application across the spectrum of the population, with a focus on children & young people. This approach could be embedded in the license application process or the outcome discussions. Each life stage of the population would be considered in terms of risk and exposure, such as children and young people, families, older people, and people recovering from alcohol dependency.

Alcohol Licenses in Edinburgh

Only three applications for alcohol sales licenses in Edinburgh were refused in the 5 years between 1 April 2017 and 31 March 2022.⁴ Over the same period, 241 applications were approved.

As of 31 March 2022, Edinburgh has 1,952 alcohol outlets⁵ (on and off trade), which means there is approximately one outlet for every 225 residents aged 18 and over (and one outlet for every 56 'harmful' drinkers in the city (consuming over 14 units a week)).⁶

Work conducted by the University of Edinburgh and Alcohol Focus Scotland in 2018 revealed that Edinburgh was the local authority area with the greatest alcohol outlet availability in Scotland (defined as the average number of outlets within an approximate 10 minute walk from the population centre).⁷ In 2016, across Edinburgh's 597 neighbourhoods, there was an average of 48.3 alcohol outlets within 800m of neighbourhoods' population centre, compared to the Scottish average of 16.8. Over half of the 597 neighbourhoods in Edinburgh had more accessible alcohol outlets than this Scottish average.

As a statutory partner in the licensing forum and reviewer of applications, NHS Lothian contributes staff capacity to the licensing agenda, with the aim of supporting the licensing objectives of protecting and improving public health, and protecting children and young persons from harm. The impact of our contributions seems very limited as reflected in the number of alcohol licenses granted and refused. A study conducted by the University of Stirling explored the impact of public health teams on the licensing system.⁸ Key messages from the study were:⁹

- No clear evidence that allocating public health resources to engagement in licensing activity resulted in downstream reduction in alcohol related harm.
- Benefits are constrained as the system cannot currently reduce alcohol availability or contain online sales.

NHS Lothian will continue to support the licensing forum and board, such as with health related data, and where possible review license applications when capacity allows.

⁴ <https://www.gov.scot/publications/scottish-liquor-licensing-statistics/>

⁵ <https://www.gov.scot/publications/scottish-liquor-licensing-statistics/>

⁶ <https://www.nrscotland.gov.uk/statistics-and-data/statistics/statistics-by-theme/population/population-estimates/mid-year-population-estimates/mid-2021>

⁷ <https://www.alcohol-focus-scotland.org.uk/media/310734/alcohol-outlet-availability-and-harm-in-city-of-edinburgh.pdf>

⁸ <https://exilens.stir.ac.uk/>

⁹ [https://www.thelancet.com/journals/lanep/article/PIIS2666-7762\(22\)00144-2/fulltext](https://www.thelancet.com/journals/lanep/article/PIIS2666-7762(22)00144-2/fulltext)

Burden of Disease Attributable to Alcohol Consumption

Data related to some of the burden of disease attributable to alcohol consumption is summarised below. Further information will be available in the new year related to A&E attendance rates which we can provide if you think would be helpful. We are aware that in Scotland, around 16% of ambulance callouts were alcohol related (2019), costing the Scottish Ambulance Service approximately £30m a year, during a time where demands were exceptionally high.¹⁰

Further information that may assist the board as part of the review could be data held by the Scottish Ambulance Service on the number of alcohol related call outs, the places and times of the call outs.

Alcohol-Specific Mortality in City of Edinburgh

The figures^{11 12} reported below are based on a narrow range of causes of death where alcohol is 100% contributory.¹³ It has been calculated that at a Scottish level this figure can be doubled to include the total number of deaths where alcohol was a contributory factor (e.g. certain cancers, CHD, stroke, hypertension etc).¹⁴ Nevertheless, this definition is useful for monitoring trends.

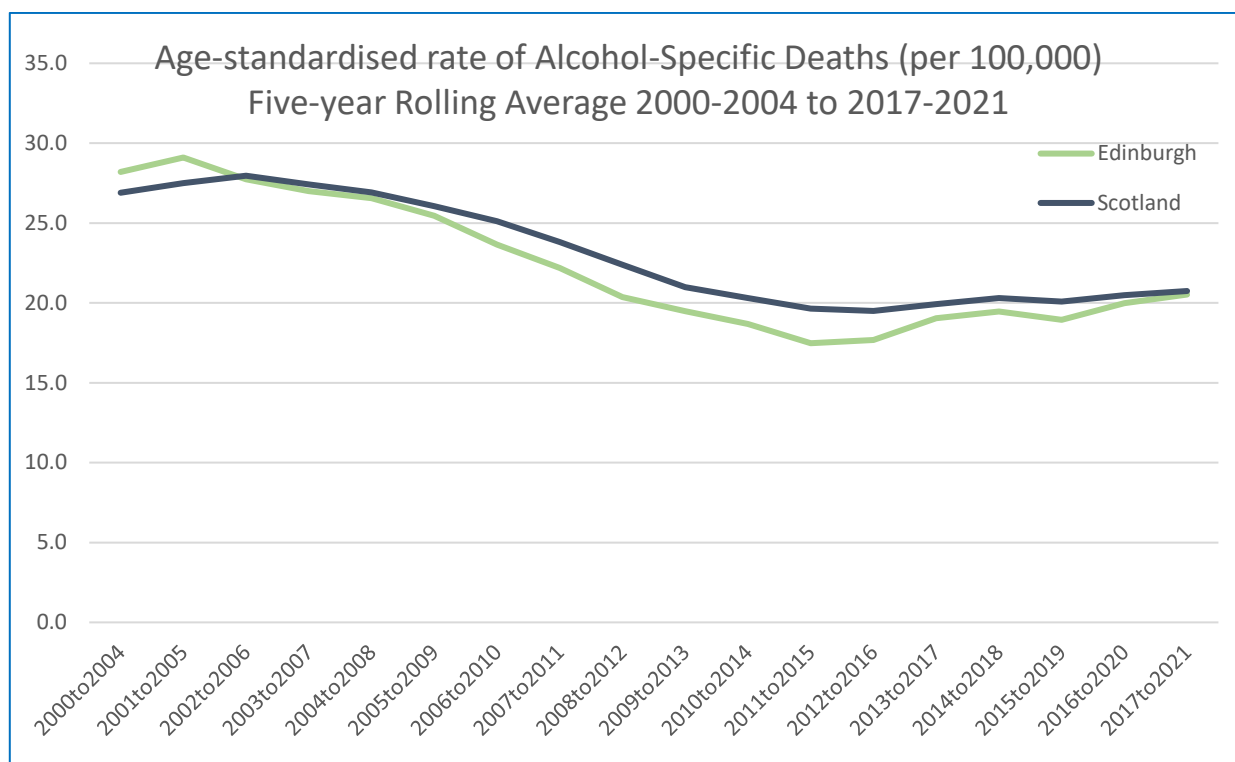
¹⁰ <https://www.ias.org.uk/2021/07/08/more-accurate-estimates-for-the-burden-of-alcohol-on-the-ambulance-service-around-1-in-6-callouts-in-scotland-are-alcohol-related/>

¹¹ <https://www.edinburgh.gov.uk/downloads/file/23341/nov-2011-nhs-lothian-report-to-board-overprovision>

¹² <https://www.nrscotland.gov.uk/statistics-and-data/statistics/statistics-by-theme/vital-events/deaths/alcohol-deaths>

¹³ Alcohol-induced pseudo-Cushing's syndrome (E24.4), mental and behavioural disorders due to use of alcohol (F10), degeneration of nervous system due to alcohol (G31.2), alcoholic polyneuropathy (G31.2), alcoholic myopathy (G72.1), alcoholic cardiomyopathy (I42.6), alcoholic gastritis (K29.2), alcoholic liver disease (K70), alcohol-induced acute pancreatitis (K85.2), alcohol-induced chronic pancreatitis (K86.0), fetal alcohol syndrome (Q86.0), excess alcohol blood levels (R78), accidental poisoning by and exposure to alcohol (X45), intentional self-poisoning by and exposure to alcohol (X65), poisoning by and exposure to alcohol, undetermined intent (Y15)

¹⁴ Grant I, Springbett, Graham L (2009), Alcohol attributable mortality and morbidity: alcohol population attributable fractions for Scotland. Edinburgh:ISD & ScotPHO. <http://www.scotpho.org.uk/alcoholPAFreport/>

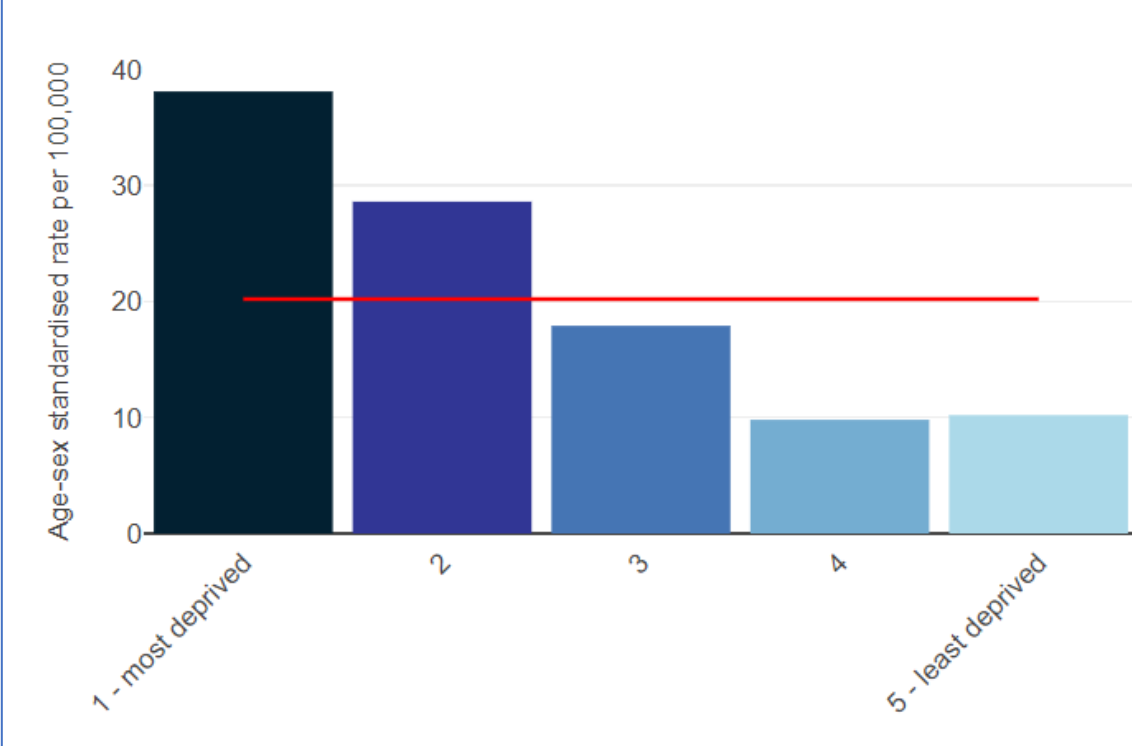


The rates indicate that alcohol specific deaths are decreasing generally in Scotland. Previously, the rate for Edinburgh was lower than the Scottish average but is currently on par at 20.5 deaths per 100,000 (20.8 deaths p/100,000 Scotland). As a comparison, the rate of alcohol specific deaths (20.5 p/100,000) is currently higher than the Edinburgh (age-standardised) drug misuse deaths (18.3 p/100,000).¹⁵ However the lower rate of drug related deaths are far more publicised than the alcohol related deaths.

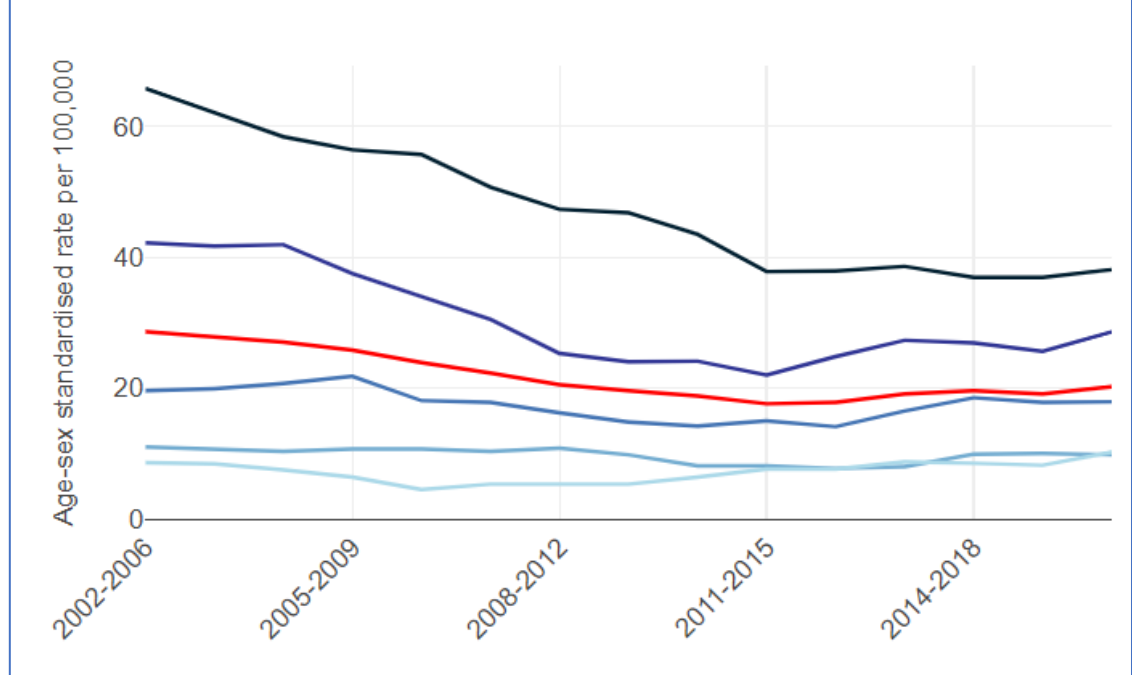
The rates of alcohol specific deaths vary significantly across the City of Edinburgh between the most deprived communities (SIMD 1) and the least deprived communities (SIMD 5), as illustrated by the below graph. Despite alcohol specific deaths generally decreasing in numbers, the significant variation still exists, with alcohol specific death rates 4 times higher in the most deprived communities compared to the least deprived communities. Therefore, inequalities in health should be considered in this review in terms of high levels of harm and death that individuals in our most deprived communities experience.

¹⁵ NHS Lothian Drug Related Deaths Annual Report 2021, September 2022

Differences in alcohol-specific deaths between deprivation groups for 2016-2020



Changes over time by deprivation group

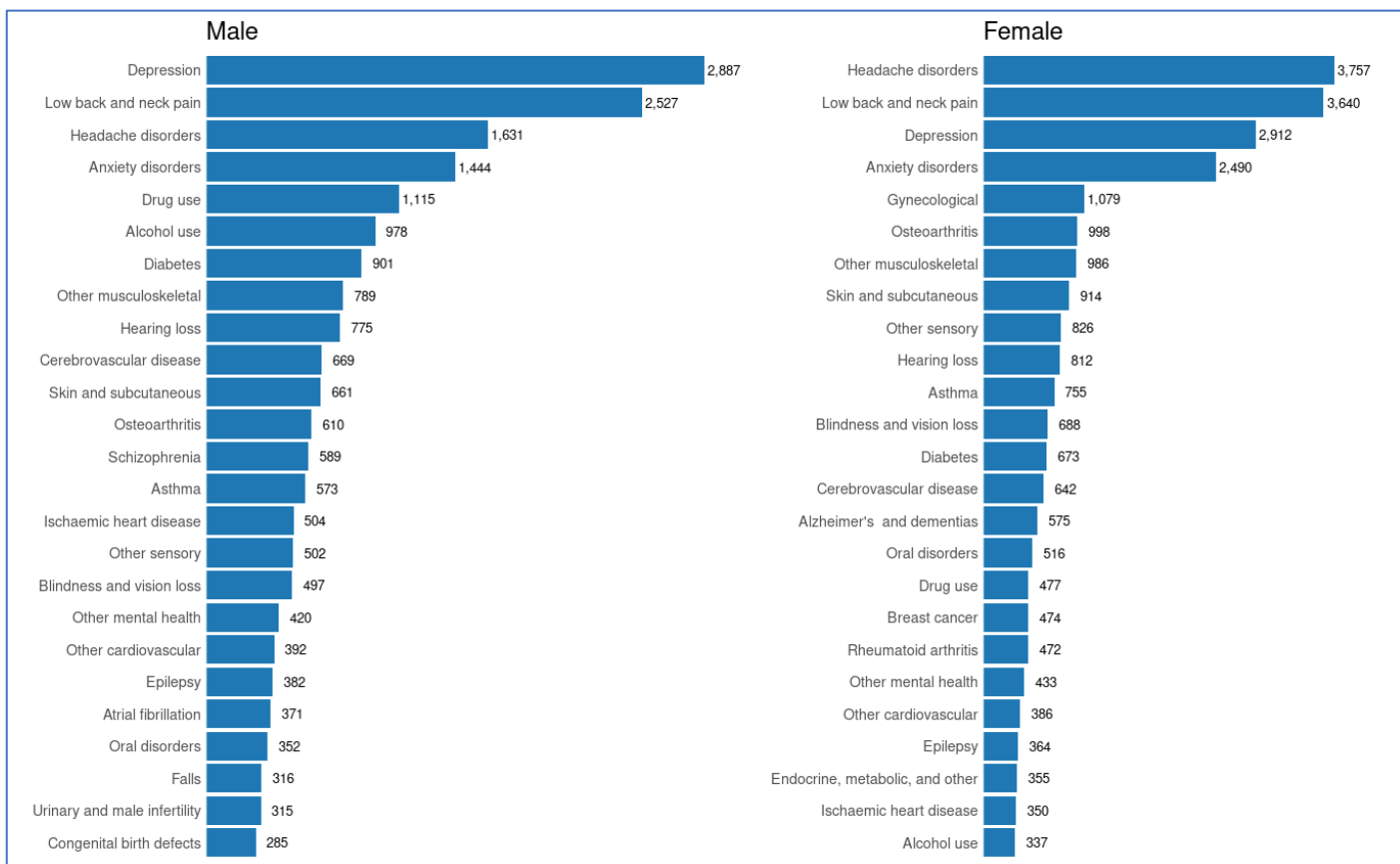


Alcohol-Related Morbidity in City of Edinburgh

The Scottish Burden of Disease study estimates the total impact of alcohol use on years of healthy life lost. In addition to alcohol-specific deaths from causes such as alcoholic liver disease and alcohol poisoning, it also contributes to years of healthy life lost due to a much wider range

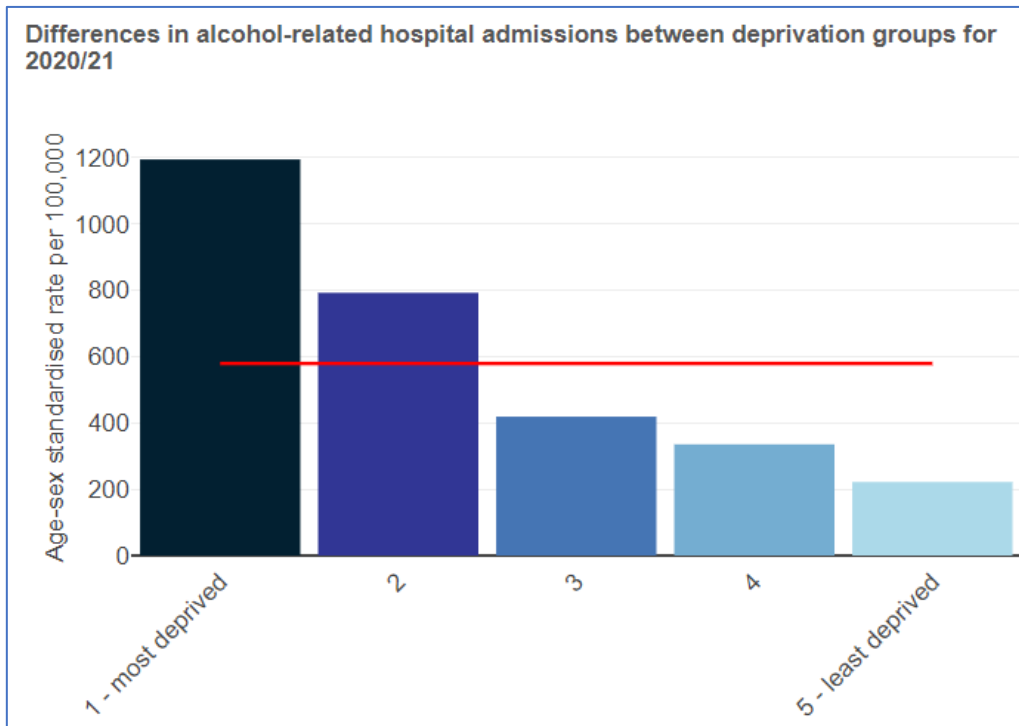
of physical illnesses such as cancer, stroke, pneumonia and accidental injuries in addition to mental ill health and behavioural disorders. The figure below shows the leading causes of ill health (years of healthy life lost to illness) in Edinburgh for 2019.¹⁶

For males in particular, alcohol use is the sixth leading cause of years of healthy life lost, and in 2019 was estimated to be directly associated with 978 years of healthy life lost (corresponding to a rate of 394 years per 100,000 population).



Similarly to socioeconomic inequalities in alcohol specific mortality, alcohol related hospital admissions are also heavily patterned by deprivation, with those living in the most deprived neighbourhoods in Edinburgh being over five times as likely to be admitted for an alcohol related illness than those in the least deprived areas.

¹⁶ <https://scotland.shinyapps.io/phs-local-trends-scottish-burden-diseases/>



Data collected related to alcohol related hospital stays, as show below, indicate the huge burden on hospitals in terms of patient numbers and overnights stays, which is increasing in length.¹⁷ This preventable burden is very concerning and put additional pressure on the health and social care system which is extremely strained.

¹⁷ <https://publichealthscotland.scot/publications/alcohol-related-hospital-statistics/alcohol-related-hospital-statistics-scotland-financial-year-2020-to-2021/dashboard/>

Alcohol-related Hospital Statistics

Local Authority: Edinburgh City

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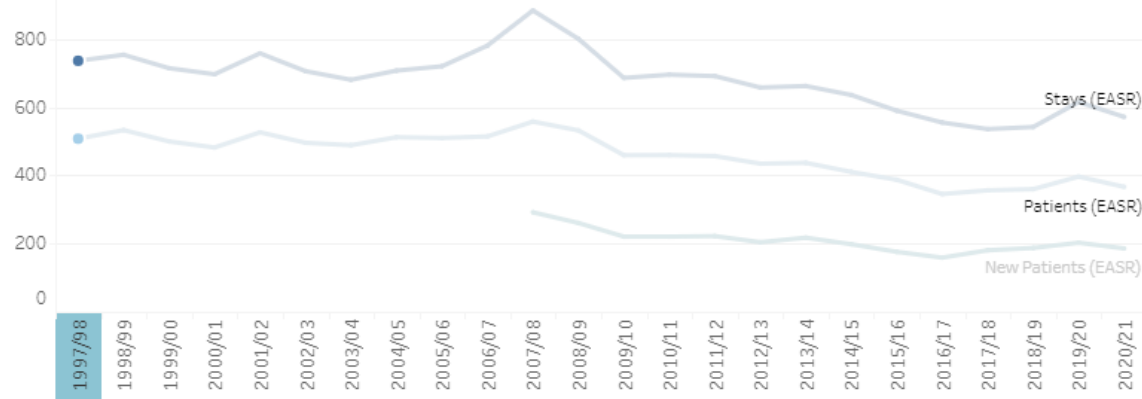


Edinburgh City
All alcohol conditions (General acute)
European Age-Sex Standardised Rates (EASR) per 100,000 population

Select Local Authority
Edinburgh City

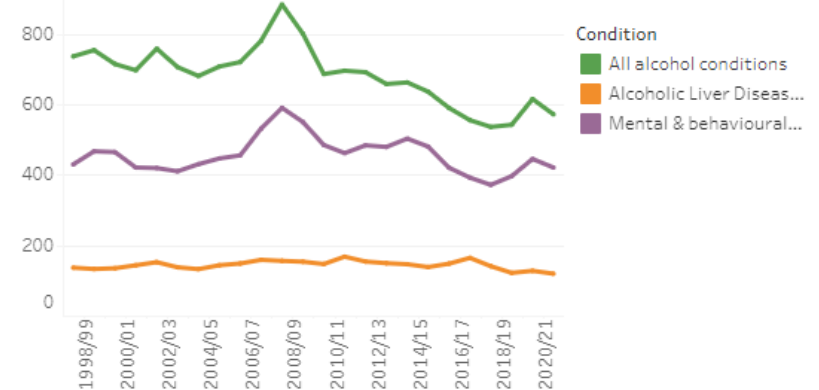
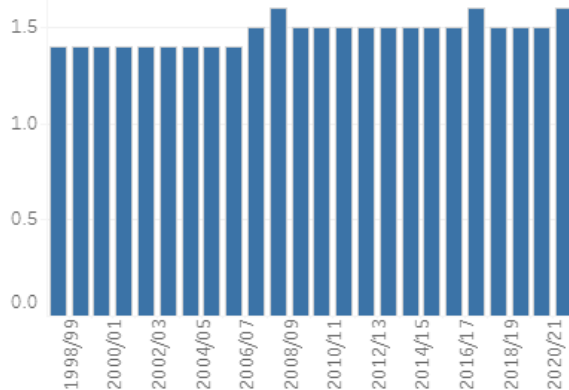
Select Hospital type
General acute

Select Condition
All alcohol conditions



Edinburgh City
All alcohol conditions (General acute)
Average number of stays per patient

Edinburgh City: Stays (General acute)
Main conditions
EASR per 100,000 population



Updated Policy

Current licensed hours

We would suggest looking at data held by the Scottish Ambulance Service on alcohol related call outs to determine if there are any patterns of call out times against opening/closing hours. Further information will be available in the new year related to A&E attendance rates which we can provide if you think would be helpful.

Extension of licensed hours

In terms of extended licensed hours, we would ask that consideration be given to the already increased pressure on the health and social care system, particularly hospitals, during certain times of the year that attract extended hours, such as Christmas and New Year. The system faces particular challenges on winter pressures and staffing levels, including sickness and coverage of public holidays.

Children and young persons access

We strongly support the objective in relation to protecting children and young people and feel this includes involving young people in discussions about the licensing system and protecting them from exposure to alcohol and alcohol related harm.

A recent Scottish study stated that alcohol use is the leading cause of harm in young people and increases the risk of alcohol dependency in adulthood.¹⁸ Key messages from the study were that:

- Off sale alcohol outlets accounted for 47% of children's exposure.
- Children living in the most deprived communities were almost 5 times more likely to be exposed to off sale alcohol outlets than children in the least deprived areas.
- Children living in the most deprived communities were almost 3 times more likely to be exposed to on sale alcohol outlets than children in the least deprived areas.
- Children in deprived areas experienced 31% of their exposure to off sales outlets within 500 m of their homes compared to 7% for children from less deprived areas.
- Children from all areas received 22—32% of their exposure within 500 m of schools, but the proportion of this from off sales outlets increased with area deprivation.

Children have no control over what they are exposed to and therefore limiting exposure to alcohol is crucial. We feel this should be a key driver for the licensing policy.

Temporary licensing

With regards to temporary licensing, we would repeat the above concerns in terms of additional burden on the stretched health and social care system and exposure to alcohol, and alcohol related harm, for children and young people.

Overprovision

Work looking at the association between alcohol outlet density and alcohol related harm in City of Edinburgh was completed in 2018 by Alcohol Focus Scotland and the Centre for Research on Environment, Society and Health (CRESH).¹⁹ Key findings from this report indicated that:

- The City of Edinburgh is ranked 1st out of 30 local authority areas for alcohol outlet availability in Scotland.
- Alcohol related death rates in the neighbourhoods with the most off-sales outlets were 2.4 times higher than in neighbourhoods with the least.
- Alcohol related hospitalisation rates in the neighbourhoods with the most alcohol outlets were 80% higher than in neighbourhoods with the least.
- Crime rates in the neighbourhoods with the most alcohol outlets were 4.2 times higher than in neighbourhoods with the least.
- The link between alcohol outlet availability and harm was found even when other possible explanatory factors, such as age, sex, urban/rural status and levels of income deprivation, had been considered.

¹⁸ Inequalities in children's exposure to alcohol outlets in Scotland:

<https://bmcpublihealth.biomedcentral.com/articles/10.1186/s12889-022-14151-3>

¹⁹ <https://www.alcohol-focus-scotland.org.uk/media/310734/alcohol-outlet-availability-and-harm-in-city-of-edinburgh.pdf>

- The total number of alcohol outlets in City of Edinburgh increased by 212 (12.1%) from 1755 in 2012 to 1967 in 2016.

There has been good evidence for over a decade that increased alcohol outlet density is associated with harms to health.²⁰ Overprovision of alcohol creates harm by directly increasing opportunities for purchases, and influences the perceived normality of alcohol consumption, including the exposure to children and young people. Overprovision also makes it more difficult for people to recover from alcohol dependence.²¹

Specifically within Scotland, researchers at the University of Edinburgh have found that alcohol related mortality and morbidity are significantly higher in neighbourhoods with a greater density of alcohol outlets.²² This relationship was particularly striking for off sales outlet density.

We are expecting that the CRESH data is revised and published early 2023 and we would be keen to share the updated data with the board to support their review of the licensing policy once published.

²⁰ Campbell C, Hahn R, Elder R et al. The effectiveness of limiting alcohol outlet density as a means of reducing excessive alcohol consumption and alcohol-related harms. *American Journal of Preventive Medicine* 2009; 37(6):556–569.

²¹ <https://pubmed.ncbi.nlm.nih.gov/28886441/>

²² <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4415114/#:~:text=An%20IQR%20increase%20in%20off,%2C%2015%25%20higher%20mortality>.

Edinburgh Licensing Forum response to Licensing Board Policy Consultation – December 2022

Current licensed hours

Community representative responses

- The current licensed hours seem to work well. Limiting sales hours to a reduced number of premises would risk over-saturation of customers at certain on-sales premises. Instead the current policy allows competition for trade.
- Staggered opening/closing times should be permitted to avoid binge drinking in the run up to closing time
- The maximum hours permitted by the Act (10am to 10pm) for off-sales are appropriate
- Consider tailoring licensed hours for new premises – overprovision area; proximity to residential areas; main dispersal routes
- Board could consider grant for trial period e.g. 12 months for assessment of compliance, after which extending hours
- Bring back premises categorisation to aid understanding of which opening hours apply
- Allow Board/LSOs to restrict hours as a consequence of non-compliance with objectives

Trade representative responses

- current long-standing licensing hours are broadly fit for purpose and seem to work well for the city, while providing a balance between a vibrant city centre nightlife and pleasant place to live and work.

Extended hours

Community representative responses

- It's fair that any premises can apply for extended hours, not restricted to certain areas e.g. the city centre
- Automatic extensions at festive periods seem to work well
- Further festive periods should be added e.g. Chinese New Year
- Maximum days should be stipulated per year – e.g. to cover summer festivals
- Improve neighbour notification process

Trade representative responses

- Board should consider extension of 'festival period' to a longer summer period, to support recovery, give the city an economic boost and improve the tourist offer.
- Board should be aware that due to financial pressures, many premises don't trade their entire licensed hours due to lack of profitability. Thus, any applications for extensions will be based on consumer demand and should be encouraged to support recovery.

Music

Community representative responses

- Definitive guidance on policy needed

- replace 'shall not be an audible nuisance' with 'shall be inaudible'
- Clarification of current noise policy and improve communication re how to complain

Trade representative responses

- Music and entertainment is a critical part of licensed premises, with a growing grassroots music scene and traditional music a key part of tourist appeal and seen as part of 'Brand Scotland' – Board should support music performances and other cultural events in licensed premises.

Children and young persons

Community representative responses

- Access is a positive for socialising and community bonding.
- Consider amending times – with respect to changed work hours etc – people may wish a family meal at later times
- Board should provide and publicise throughout the trade very clear guidance that establishments can apply for extended hours for children and young persons. Premises should then be required to publicise it to customers
- Clarify distinction between 11pm and 1am indicative terminal hours

Trade representative responses

- Access to licensed premises is critical to Edinburgh and Scotland's tourism offer as a family friendly destination. Previous longstanding policy of no access has done significant damage to reputation of the city. Board should actively encourage businesses to apply for extensions where licences are currently restricted beyond terminal hours. The need for terminal hours at all should be considered.

Temporary licensing

Community representative responses

- Seems to work very well now connected to licence holder instead of venue
- More enforcement resource needed, and faster penalties (closure/fines). A poorly managed two day event with a temporary licence will be finished before action can be taken, whereas a pub would be up for premises review after similar
- Board should satisfy itself that appropriate and robust background checks are completed on organisers before licences are issued
- Limit number allowed per year at an address – unless this is to allow trading under a provisional licence

Overprovision

Community representative responses

- A new hotel or pub being built should not be given a licence unless one is revoked or a venue closes elsewhere
- Licence numbers limitation per premises type

- Evidence of effect of policy?

Trade representative responses

- overprovision policy is a blunt instrument and does little to reduce alcohol related harm. The Board should consider basing any overprovision policy on a locality basis.
- overprovision negatively impacts the ability of the city and businesses therein to attract investment. Little evidence to suggest zones have made positive impact on public health and doesn't differentiate by type of premises. With every application to be considered on its individual merits, the question is what positive benefits overprovision zones bring to any areas.

Other

Community representative responses

- Board should make effective use of appropriate metrics when considering applications – should be evidence-led e.g. where are most problems for off-sales in terms of illegal provision of alcohol for under-age drinkers. Police and court records, licensing officers, social and community work information etc
- Impose requirement for licensed premises to clear litter within e.g. 20m at closing
- Operating plans to include queue management
- Gather trade suggestions on methods to minimise negative impact of dispersal from licensed premises

Trade representative responses

- It is important that restricted products (including alcohol) are strictly regulated and responsible retailers will include measures to promote this – such as record keeping and age verification
- Policy Statement should continue to promote the City as a vibrant, cultural capital while balancing the needs of pub-goers and residents to ensure continued success of the City.
- Board must be mindful of wider COVID recovery context. Sector is struggling at the moment (record inflation, supply chain pressures – in part due to war in Ukraine, staffing crisis, unfathomable energy prices, cost of living crisis and record business rates bills). Trade must be supported in order to avoid 'race to the bottom'.

Response from Merchiston Community Council to CEC Licensing Policy Consultation 2022/23

We have focussed on aspects of the Policy with which MCC has been particularly and actively concerned in recent years.

2.11 The statement that all premises for which a licence is being sought will be “*expected*” to comply with building standards requirements etc is not in our view strict enough. We prefer “*required*” to “*expected*” and relatedly would like to see something about this being checked and enforced. Examples from our area can be provided of damage inflicted on a listed building and of illegal blocking of a public right of way.

3.6 The clause “The Board will dispose of its business in an open, fair and transparent manner” is qualified in 6.9. We do not agree that *any* of the Board’s deliberations should take place *in camera*.

Also, we feel that the same amount of time should be allowed for presentations by applicants and objectors. There has been a tendency for applicants, especially when represented by a lawyer, to be given a disproportionately large amount of time to put their case while objectors are directed to speak for not more than a few minutes.

4.1 We believe that the requirement to notify community councils only of premises licences and relevant variation applications should be extended to include applications for occasional licences.

5.7 We believe that the number of premises in respect of which occasional licences are granted should be limited so as to minimise loss of custom for established premises in the vicinity. Also, experience suggests that premises operating with occasional licences do not always meet Health & Safety standards and may for example not have any toilet facilities.

6.2 We feel that when the Board discusses new licence applications, the “*likelihood* of grant having an adverse impact” needs to be more rigorously taken into consideration. When a licensed premise has just or not even yet begun trading, “*likelihood*” is the only available measure. Community Councils are well placed to be aware of this.

6.4 There needs to be clarity about the relative weight attached by the Board to direct vs indirect complaints. For example would a resident’s complaint to a community council or to the police be taken into account? We need to be

confident that all complaints are considered, not just those brought directly to the Board.

7.2. The statement that amplified music in licensed premises is acceptable unless it causes “audible nuisance” has been a grave mistake from the moment of its introduction. “Nuisance” is a highly subjective term and needs to be replaced by something more objectively measurable.

8. We understand that our area has not been designated an area of over-provision of pubs and bars as have nearby neighbourhoods like Tollcross. However, it must be borne in mind that there is a substantial but unknown number of premises here selling alcohol off-licence. We suggest that, in the interests of public health and other considerations, off- licence alcohol sales premises be subject to the same quotas as on-sales.

23.2 One of the stated objectives of CEC Licensing Policy is to secure public safety. For this reason we suggest that, especially on busy nights in busy premises situated on busy pavements/roads, there should be details clearly posted near the door giving phone numbers of taxi companies, emergency services etc. And LSO contact details.