

Overprovision Consultation Responses (May 2024)

Contents

This document sets out narrative responses provided to the following survey questions.

If you answered yes to any (should there continue to be overprovision) - does your answer relate to all licensed premises or licenced premises of a particular type, e.g. pubs, restaurants, hotels/convenience stores/supermarkets/entertainment venues/etc..... 1

Thinking about the licensing objectives, please explain your answer as to whether there should be a continuance of Overprovision in the localities from the 2018 assessment4

Are there areas/localities that you would like to see added to our areas of overprovision? If yes, please either describe the area or provide a postcode. 10

Please explain your answer - Are there areas/localities that you would like to see added to our areas of overprovision? If yes, please either describe the area or provide a postcode. 12

Do you think there should continue to be overprovision of licensed premises in any of the localities designated by the Board as being subject to overprovision in its 2018 assessment?

If you answered yes to any - does your answer relate to all licensed premises or licenced premises of a particular type, e.g. pubs, restaurants, hotels/convenience stores/supermarkets/entertainment venues/etc

Hassard
Licensing Ltd
(Org)

Overprovision is a blunt tool that, in a capital city such as Edinburgh should not be applied to areas of the City Centre. Overprovision will deter inward investment and undermine existing City of Edinburgh Council strategies such as the present planning policy and importantly the the City Centre Transformation Strategy. The Transformation Strategy has at it's heart the vision that the City Centre should be a place for people to ""play, visit, live and work"".

	<p>The ""Case for Change"" document that underpinned the Strategy acknowledged Princes Street and George Street must become attractive places for people to spend time if they are to survive and thrive as retail and leisure destinations.</p> <p>Princes Street and the West in particular are struggling to attract and retain retailers they need experiential businesses (restaurants, cafes, entertainment venues) to drive footfall. The modern city see these venues drive and sustain footfall with retailers receiving the ancillary visits - not the otherway round.</p>
E. Wills (Ind)	<p>My comments relate to all premises. Since over provision areas were introduced the Grassmarket area has become much quieter with less late night drinking, Regulations about outside tables should be more tightly regulated and enforced as the area is now a mass of tables and chairs. Buskers playing amplified music should not be encouraged by pub landlords. Tenemented properties should not have to endure pub noise.</p>
J. Archibald (Ind)	<p>Yes, all licensed premises as currently described.</p>
S. Millar (Ind)	<p>I think that the overprovision is most serious in pubs & entertainment venues that sell cheap drinks and , and especially off sales (including articially cheap price offers) from supermarkets & convenience stores.</p> <p>Restaurants and hotels are not such a problem as drinkers there are indoors for a period of time and likely to be consuming food as well as drinking.</p>
G. Forbes (Ind)	<p>All licensed premises.</p>
G. Hamilton (Ind)	<p>All.</p>
P. Swanson (Ind)	<p>The term overprovision is a toothless term in the licensing objectives...it has no meaning unless you back it up in courts of law and you don't because every time you will get defeated by the competition laws in favour of the applicant...how many times have the council sighted overprovision in turning down an applicant??...NEVER</p>
Aftermath Restaurants Ltd (Org)	<p>All licensed premises</p>
K. Finlayson (Ind)	<p>I think there should be options for alcohol and alcohol free drinks available in all licensed premises, and if there are more issues with crime and being drunk and disorderly in an specific area, that should be addressed as an individual section. To put the same blanket approach, may hurt small successful businesses, that do not have unsociable behaviour issues or it may even prevent social hubs being created.</p>
C, Petit (Ind)	<p>All</p>
D. Race (Ind)	<p>Bars & restaurants</p>
K. Singh (Ind)	<p>All licensed premises</p>
C. Skene (Ind)	<p>I believe there are enough bars within the old town but knowing Edinburgh licensing board they will continue to offer alcohol licenses to shops wishing to sell alcohol in these areas so this just screams like a waste of money in order to do what they want to do anyway.</p>
F. Mitchell (Ind)	<p>pubs, restaurants and entertainment venues.</p>
C. Stewart (Ind)	<p>All.</p>

J. Linter (Ind)	Retail and hospitality in particular is struggling so only the strongest survive. Let the market determine the need. Rather a pub or convenience store than another empty shop.
J. Kane (Ind)	AS LONG AS A VENUE WHO APPLIES FOR A LICENSE ABIDES BY THE RULES AND REGULATIONS THEN I DO NOT FORSEE AN ISSUE. LICENSES ARE ALWAYS UP FOR QUESTIONS AND CAN BE TAKEN AWAY WITH ANY PROBLEMS THAT ARSIE. IN ADDITION, DUE TO THE AMOUNT OF PUBLIC BARS BEING SHUT DOWN, I GENERALLY FEEL THERE IS LESS BARS THAN THERE USED TO BE AND THOSE THAT ARE AROUND ARE USED MORE AS EATERIED THAN WATERING HOLES.
Roseleaf (Org)	Personally I think over provision will not increase drinkers. Just like many hairdressers on one street doesn't increase me to get my hair cut. Drinking alcohol is in decline. I think most licensed places are community hubs and are well run. It's people getting drunk from alcohol bought in supermarkets at lower costs etc that are the issue. Over provision of licesnes would reduce public nuisance imo due to there being more policing of consumption within these premises.
R. Watson (Ind)	These venues are the lifeblood of the city, unlike student accommodation, and should be supported by the city
R. Mackay (Ind)	All. Market forces will drive supply, and kill it off if there is no demand . Stop trying to micromanage society!!
B. Lyon (Ind)	To many licensed convenience stores .
Leith Harbour and Newhaven CC (Org)	Convenience stores
Old Town CC (Org)	All licenced Premises
P. Beswick (Ind)	All licensed premises
C. Oxley (Ind)	Nope
J. Kalinauskaite (Ind)	Pubs, hotels, entertainment venues
C. Jenkin (Ind)	Pubs n restaurants
S. Hawkins (Ind)	This should apply to public houses and supermarkets as the main purveyors of alcohol.
R. Kandiah (Ind)	To all licensed premises
D. Brown (Ind)	All licensed premises
D. Cairns (Ind)	All licensed premises.
M. Birch (Ind)	Any licensed premises including those providing off sales
New Town & Broughton CC (Org)	Typically those contributing to the Night Time Economy (NTE) when in mixed use areas or neighbouring residential areas, where patrons tend to be visitors and spill out into the streets and indulge in anti-social behaviour which become the responsibility of public services to manage – e.g. Police and NHS - as opposed to overnight guests, where anti-social behaviour would more likely be contained

	indoors while also remaining the responsibility of the hosting establishment to manage.
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Thinking about the licensing objectives, please explain your answer as to whether there continues to be overprovision in the localities from the 2018 assessment

Hassard Licensing Ltd (Org)	For any premises to be granted a licence and to retain the privilege of holding a licence they must comply with the 5 licensing objectives. We'll run licensed premises offer spaces for different demographics to meet and socialise. New premises drive innovation and improve standards. Edinburgh is a city in the race to the top not a race to the bottom.
E. Wills (Ind)	The objectives seem fine
J. Archibald (Ind)	The area I know best and in which I used to live is the Grassmarket. The noise, the behaviour of many of the pubs' customers, the mess of litter and vomit, the petty vandalism and graffiti - all these things are exacerbated by the number of licensed outlets. The Grassmarket and surrounding area could be transformed into the kind of civilised and attractive venues that you get in Europe. In Edinburgh we seem to sink to the lowest common denominator.
S. Millar (Ind)	I think that all 5 are most threatened by pubs and stores that sell cheap drink until late at night. Off sales are particularly dangerous to young people who always seem to be easily able to obtain alcohol illegally
G. Forbes (Ind)	I do not think that the number of licensed premises is the root of the social issues listed. It is more to do with the way the premises are run and behaviours of those who use the premises.
P. Swanson (Ind)	Overprovision should be abolished as its never used and the same old arguments get churned out time and time again
G. Dawkins (Ind)	There is already sufficient control on licensed premises via their very licensing. The drinks industry provides vibrancy, community cohesion and jobs
K. Langenfeld (Ind)	I do not believe that an area of overprovision benefits the licensing objectives in any way. Cases should be studied one by one and high volume discount bar chains should be limited as they tend to be the first link to nuisance.
K. Finlayson (Ind)	I feel that a personal license holder, can work alongside their team, train their team to show all customers a pleasant experience, all the while maintaining the objectives. All the team are consistent to work together in communication of the on goings on the premises, and our customers know the standards we uphold. If it was a challenge to uphold these objectives, then I feel that is where an individual location review would be required.
C, Petit (Ind)	Numbers of current sale points for alcohol in these areas still causes significant disturbances in border areas not listed as overprovisioned and are therefore contrary to the licensing objectives of reducing crime, preventing harm and/or public nuisance.
S. Carstairs (Ind)	When looking at Princes Street area retail units are leaving at an alarming rate making the town look empty and outdated especially in comparison with other UK and EU major cities. With new hotels being built/planning permissions being submitted it makes sense to increase the amount of licensed premises, namely restaurants for more variety.
D. Race (Ind)	Too many in a condensed area leads to too many flash points and opportunities for trouble makers

Hillside Bowling Club (Org)	Lots of public houses closing at moment.
D. Mclauchlan (Ind)	While I appreciate the concern regarding overprovision in areas. The hospitality industry continues to suffer post pandemic and is, in my opinion a key industry not only for jobs but also to support Edinburgh's tourism market. While I support the idea of public health support and recognise the importance of this, it feels like, as an owner, independent businesses in the hospitality sector are seen as fair game with regards to how they are treated. Over provision, in my opinion forces independent operators out the market and only allows for large corporate chains to operate in the city.
M. Bell (Ind)	the type of licence and operating of the premises are more important
Fulbeck House Limited (Org)	Surely its the terms of Licenses and the adherence to those terms by Licensees that matter in terms of meeting the License objectives. A hotel that allows customers to snort cocaine in its toilets is causing more harm than a bar that diligently refuses to serve underage customers or customers who are drunk. Most public nuisance is from fast food rubbish discarded in the streets and young(ish) adults ""pre-loading"" at home before going out. Enforcing License conditions and shutting down a few places that break their terms would improve the behaviour of the many.
N. Kannan	Preventing public nuisance Protecting and improving public health There are already too many in those areas. Over provision will show the council encouragement to alcohol consumption to public. Edinburgh have great culture to offer to tourists. Not just alcoholism.
K. Singh (Ind)	Discriminating certain types of businesses ie, smaller convenience stores etc, would not help achieve the objectives.
C. Skene (Ind)	I've been in meetings where alcohol licences have been granted to people wishing to sell alcohol in areas designated as "over provision areas" The licensing objectives are used by this council and board as and when they are suited to their end outcome. If a license request is made in an area described as having an over provision it should be rejected out of hand, but it rarely is. I've requested FOI information on this. So in short the licensing objective are selectively used by the council to suit its needs, not Edinburgh residents.
R. Harris (Ind)	The Council should leave market conditions to naturally sort out over provision. Council interference only gets in the way of natural business circumstances, such as a business no longer being viable and shutting down.
Great Grog (Org)	As long as license holders are trained in the objectives then premises do not contribute to any societal problems as sellers are aware of the issues which can arise. The whole idea of an area of over provision is outdated as if people would like to drink, then walking further is not going to dissuade them. Supermarkets are much cheaper than small licensed premises such as ourselves, thus if Scottish laws around minimum pricing are to be seen as the way to address over consumption, then it holds true that business such as

	<p>ourselves are not the problem in Scotland. It is large chains who have the economies of scale to sell alcohol at a very low cost per unit.</p> <p>We know the vast majority of our customers very well from having built up a relationship over time. This adds an extra element of responsibility on our part to ensure public health as we feel we have a greater duty of care.</p> <p>Alcohol consumption levels in Scotland are decreasing on their own accord if one looks at younger age groups.</p>
C. Stewart (Ind)	Overprovision is entirely subjective. Reducing provision will not impact the licensing objectives. Proper licensing should do that.
J. Linter (Ind)	It is how licenced premises are managed and customer's behaviour is monitored and controlled that determine meeting the objectives, not the number of establishments. Fewer does not mean that the objectives are achieved any more easily, in fact the converse may be true if there is under provision in a destination city such as Edinburgh.
Juniper Green Bowling Club (Org)	If the premises adhere to the license then there will be plenty provision of in these areas to ensure that the public are safe.
J. Kane (Ind)	ALL THE OBJECTIVES ARE ENFORCED WITHIN A PREMISES THAT HAS A LICENSE. THE ONLY POTENTIAL ISSUE IS IMPROVING PUBLIC HEALTH. BUT IN RELATION TO THIS, RISING COSTS AND WAGES ARE DIRECTLY FORCING LICENSED ESTABLISHMENTS TO RAISE THERE PRICES WHICH IS CAUSING MORE DAMAGE TO PUBLIC HEALTH AS I RECKON THE PUBLIC DRINK MORE AT HOME NOW WHERE THE ONBJECTIVES ARE NOT A PRIORITY OR EVEN ENFORCED..
Roseleaf (Org)	As mentioned above. People that have a license and are policed are literally the ones upholding the objectives. The more there are, the more policing would be done. Also to add, when people leave a bar, I have seen this is the time where issues can arise due to fresh people being put out onto the streets at the same times due to licensing hours. Carry out and home drinking culture is wavy more problematic these days imo. Just look at the amount of bars/clubs closing. They aren't the issue.
R. Watson (Ind)	It's not the job of the council to overreach in areas of public health and personal choice
C. Knowles (Ind)	There are lots of issues like underfunded social care, broken communities, gentrification, lack of social spaces for teens etc that are definitely going to be bigger causes of each of your objective issues. It looks like this proposal is just a much cheaper way of looking like you are doing something about them, but in truth it will only potentially limit the symptom without doing anything to resolve the cause.
Scottish Beer & Pub Association (Org)	<p>There is no evidence that overprovision as a policy has done anything to reduce alcohol related harm or further any of the five statutory licensing objectives. It is a blunt instrument which doesn't differentiate between the type of premise, the cost of the alcohol at said premise, and still requires individual hearings for applications regardless.</p> <p>What it has done is limited potential investment into the areas deemed areas of overprovision, with the city losing out on much needed investment into the sector with other cities and areas attracting money which would have otherwise been invested in Edinburgh.</p>

	<p>Investment into the sector has never been more important. With the sector being hit hard by brexit, the pandemic, energy price increases and the current cost-of-living, cost-of-doing-business crisis.</p> <p>The sector also needs investment to maintain high standards and stop deterioration in premises. There is a real risk that too onerous policies creates a downward spiral which actually increases crime and disorder, reduces public safety, creates public nuisance, increases health harms for adults and children.</p>
R. Mackay (Ind)	Stop trying to micromanage society! Market forces will determine provision.
B. Lyon (Ind)	I think limiting of sales would help all your objectives.
S. Mitchell (Ind)	<p>Limiting the number of premises does not achieve any of the objectives, if anything by limiting the number of premises it adversely impacts public safety and may negatively impact health. If operators believe here is a commercial-case for an outlet then they should be allowed to do so an enhance competition.</p> <p>The five objectives would be better achieved by concentrating on antisocial behaviour on our streets and the open drug dealing and taking that happens - none of these people are using licensed premises.</p>
Leith Harbour and Newhaven CC (Org)	The 5 licensing objectives will be enhanced. I'm thinking about under age consumption primarily.
M. Aikman (Ind)	<p>I believe each individual application should be judged on its merit.</p> <p>As you stated, there are several different types of licensed premises and therefore there could be an overprovision of one type (eg hotel) and none of another (eg convenience store) which makes a mockery of the overprovision classification, as a new convenience store would not be able to open in an 'overprovision area', despite that not being the case for that type of licensed premises.</p> <p>Many of these licensed premises operate in very different ways and appeal to different people, and at different times so should be judged individually rather than blanket classification.</p>
L. Johnson (Ind)	I firmly believe that these designated areas of overprovision of licensed premises should no longer be in place as this would prevent crime, secure public safety, prevent public nuisance, protect public health and protect children and young people from harm.
Helen S. (Ind)	It's underage kids buying alcohol from shops that's the problem. 40 years ago my friends and I drank underage but in pubs or restaurants never on the street. Successive governments have increased pub prices so much that they have caused the problems with drunken kids who most likely would not get served in pubs. Cost of living is already hammering the hospitality trade so there soon will not be an overprovision. Go after the shops who sell alcohol to anyone
Old Town CC (Org)	Preventing Crime Preventing public nuisance and protecting and improving health
P. Beswick (Ind)	You list 129 alcohol licenses in Tollcross. Many relate to the night time economy. There are instances of disorder and many older residents feel unsafe and will not go out. The number of alcohol related accident and emergency admissions from this area is higher then expected so the number of alcohol outlets should

	decrease and not be added to. For the betterment of health restricting supply has been shown to be the most important factor.
P. Barr (Ind)	Others may have different experiences, but in 40+ years of living in Edinburgh I've never felt that drunken behaviour is significantly or regularly out of hand and therefore the protections listed above do, in my view, succeed. Even when there's a rugby match or hen parties or other drink-associated events, there never seems to be a lot of peeing in the street or petty vandalism which must seem funny at the time, or people staggering around in a state. I think the pubs here handle things pretty well.
C. Oxley (Ind)	Leave it alone, it's fine the way it is
J. Kalinauskaite (Ind)	As a resident in central Edinburgh I observe a clear correlation between the amount of entertainment premises selling alcohol such as pubs and hotels and increased public nuisance including peeing on streets (and in private entrances), noise levels, litter on streets, home entrances, flower pots, greens etc. The premises are not interested in controlling the drunkenness of their customers and so leading to hundreds of drunk people on streets, including young girls open for abuse (seen on number occasions guys eyes on a potential victim), guys aggressive, loud and looking for trouble and so on. All this promotion of drinking and having fun in Edinburgh continues raising further generations who see the only way of having fun by getting drunk and so the cycle goes on leading to addictions and more nuisance. The city sells it self to the rest of the world and UK as a place to come and have fun (drink) rather a place to admire its history so attract that type of visitor who don't respect locals living here.
Balerno CC (Org)	BCC has no statutory responsibility for the areas referred to.
CEC - Public Protection (Org)	<ul style="list-style-type: none"> - Overprovision can promote excessive alcohol consumption. This can normalise the behaviour, particularly in children and young people. - Overprovision can lead to overconsumption of alcohol, which is in turn linked to public nuisance and antisocial behaviour. - Overprovision can be particularly hazardous to vulnerable adults, particularly those who experience poor mental health or dependency/addiction to alcohol. Public Health Scotland's VAWG priority paper 4: Harmful Substances states: <ul style="list-style-type: none"> - Women experience alcohol-related violence disproportionately and at higher rates than men (p.9) (In 2022-2023 Police Scotland recorded more than 400 domestic abuse related crimes in Edinburgh as having been aggravated by alcohol. This has an impact both on the victims of abuse but also on their children) - Experiences of physical, psychological and sexual violence are more prevalent in women whose partners use alcohol or drugs, and heavy alcohol or drug consumption in men is linked to higher perpetration rates of physical and sexual violence than the general population. Heavy or binge drinking is also recognised as a contributor to the perpetration of domestic abuse and/or sexual violence, which is more frequent and more severe (p.10) - Traffickers are known to use alcohol and drugs to control victims of sex trafficking to manipulate or exacerbate alcohol or drug dependency, or intentionally targeting vulnerable people with problematic substance use (p.10)
C. Jenkin (Ind)	We need a vibrant city centre with adequate hospitality
K. Main (Ind)	Disorder is still high in central areas. Impact on mainly young people and long term health implications

Tollcross CC (Org)	<p>"My experience of the Tollcross locality has been that, since it was designated an area of overprovision, virtually all applications have been granted, making exceptions the rule and apparently making its designation pointless but on the other hand there have been few applications and it could be that some potential applicants have been deterred from applying by the default policy being not to grant in areas of overprovision.</p> <p>Do we know whether designating areas of overprovision reduces levels of consumption? That is what needs to be done to protect and more importantly improve public health. The other Licensing Objectives can be addressed on a case by case basis but not public health"</p>
Leith Bottle Shop (Org)	(refers to email response)
S. Hawkins (Ind)	Reduced access to alcohol can reduce the incidences of alcohol related poor health.
TLT LLP (Org)	<p>The Licensing Objectives are stand-alone legal grounds for refusal of an application for provisional or full premises licence) or indeed major variation application). While <i>Brightcrew Ltd v City of Glasgow</i> assisted with interpretation of the licensing objectives and the legal remit of same, the objectives themselves, even when limited to being linked to the sale and consumption of alcohol, provide the Licensing Boards with a wide margin for interpretation as to what they would wish to see from Licence Holders in order for the objectives to be upheld. This, in our legal view is a much more pointed and powerful tool for the Board to use, rather than a blanket policy on overprovision. When considering overprovision as a concept and keeping an eye on the Board's statutory duties enshrined within the Licensing (Scotland) Act 2005, the Board must be careful to consider whether they are being presented with true data evidence, or simply modelling beliefs. The two are very different. In considering their overprovision policy, has the Board been provided with true evidence that the current areas of overprovision have lead to a positive impact on any of the five licensing objectives. The Board must be sure that it a causal link between the premises operating within the localities as defined as being "overprovided" for, and the IDZ evidence provided by consultees exists. Please see additional paper.</p>
D. Brown (Ind)	It does not seem to me that there is overprovision, and it should not be for Councils or Government to try to control business in this way.
A. Williams (Ind)	<p>I don't think it's the right approach to have a presumption against new premises licences - the base consideration should be the type and size of the establishment, and whether that is in line with the objectives. My concern is that areas of overprovision can prevent new small local businesses from opening / being successful (e.g. new restaurants, cafes with a small alcoholic drink selection), whereas larger chain pubs/shops have the expertise and resources to cope with a more drawn-out licensing process, multiple licensing board hearings, adjusting plans etc. The same rules should be applied to developers - it seems unfair for a premises licence to be granted to every new unit in the St James centre regardless of use / future tenants, while small businesses across the road could be denied a licence due to over provision.</p>
D. Cairns (Ind)	It is established that there is over-provision of licensed premises. It is irrelevant where people are obtaining/consuming alcohol, if the number of licensed premises is not controlled then the licensing objectives will not be able to be achieved.

M. Birch (Ind)	Access to alcohol can adversely affect all of these objectives. Many shops selling alcohol do not have the ability/staff to prevent the theft of the alcohol being displayed so that it is being accessed by people including young people with adverse impacts on their health and behaviour.
New Town & Broughton CC (Org)	The presumption against grant in an area of overprovision has led to higher standards for any business seeking to trade or vary their operations. While each and every application tend to be approved, it has been through healthy scrutiny by the current Licensing Board. We support this process and believe that it should continue, especially in mixed use areas.
J. Trotter (Ind)	These are societal problems that are not caused directly by licensed premises, and any that are have more direct links to other issues - poverty, poor education, lack of mental health resources. Overprovision removes the opportunity to create locations where people want to be, to live - there is a reason people want to move to these areas and visit them.

Are there areas/localities that you would like to see added to our areas of overprovision? If yes, please either describe the area or provide a postcode.

M. Virtue (Ind)	Rose Street/ Frederick Street & George Street
Hassard Licensing Ltd (Org)	No. The statistics show that prior to the implementation of the 2005 Act that in 2007 there were 1929 licences in force in Edinburgh. In 2022 the number is 1952 which is less than a 2% increase https://www.gov.scot/publications/scottish-liquor-licensing-statistics/ * In the same time period the population of Edinburgh has increased dramatically (471,000 in 2007 to 548,000 in 2022). *Chart forwarded to the Clerk to the Board by email covering numbers of licences in force year on year.
E. Wills (Ind)	It should be city wide unless residents wish otherwise
J. Archibald (Ind)	The whole of the old town could do with a rethink.
S. Millar (Ind)	Leith Walk and North Leith
G. Forbes (Ind)	No; though there are areas of the city which are underprovided.
P. Swanson (Ind)	No
G. Dawkins (Ind)	No
K. Langenfeld (Ind)	No
K. Finlayson (Ind)	No
C, Petit (Ind)	Most areas located in between the current overprovisioned areas in order for the over provision orders to have a meaningful impact eg West End, Dalry/Haymarket

D. Race (Ind)	George Street
Hillside Bowling Club (Org)	No
M. Bell (Ind)	No
Fulbeck House Limited (Org)	No
N Kannan	None
K. Singh (Ind)	N/A
C. Skene (Ind)	No
F. Mitchell (Ind)	no
R. Harris (Ind)	No
Great Grog (Org)	no
C. Stewart (Ind)	No
Juniper Green Bowling Club (Org)	No
J. Kane (Ind)	NO, I THINK THE MORE THE MERRIER AS LONG AS THE OBJECTIVES ARE ENFORCED BY THE LICENSEES
Roseleaf (Org)	No, based on everything I've already said.
Scottish Beer & Pub Association (Org)	No
R. Mackay (Ind)	No
B. Lyon (Ind)	No.
S. Mitchell (Ind)	None, remove the over provision criteria and let business and competition flourish. The Council should focus on the quality of operations and not the quantity.
M. Aikman (Ind)	In my opinion, the only one that might be worth considering is in the Cowgate area, where many of the issues seem to arise, specifically in relation to the licensing objectives.
L. Johnson (Ind)	No
Old Town CC (Org)	George Street and Lothian Road
P. Beswick (Ind)	No
P. Barr (Ind)	No
J. Kalinauskaite (Ind)	Eh3

Balerno CC (Org)	<p>None.</p> <p>There is no proposal in the consultation directly affecting Balerno.</p> <p>The Council does not believe that the community of Balerno would support designation of Balerno as an area of over provision, we're that to be the case, which it is not.</p>
CEC - Public Protection (Org)	No
K. Main (Ind)	Leith
Tollcross CC (Org)	<p>The whole of Edinburgh should be designated an area of overprovision of off-licensed premises. Particularly those premises (general stores), whether large supermarkets or smaller local convenience stores, where alcohol is sold alongside normal food, drink and other consumer products, tending to normalise alcohol and facilitating (if not promoting) impulse buying.</p> <p>To actually do something to improve public health the Board needs to cut permitted off-sales hours (currently 10am -10pm Monday to Saturday 11am to 10pm Sunday) (e.g. to 11am - 9pm for normal off-licences and 12Noon to 8pm for general stores), reducing availability - one of the few things that affects levels of consumption.</p>
Leith Bottle Shop (Org)	No
S. Hawkins (Ind)	Portobello
TLT LLP (Org)	No.
A. Williams (Ind)	No
D. Cairns (Ind)	Portobello and Craigmillar.
M. Birch (Ind)	Leith Walk, Rose Street, George Street and all of the cross streets between Princes Street and George Street
New Town & Broughton CC (Org)	Yes - Leith and Leith Walk

Please explain your answer to the question whether there are areas/localities that you would like to see added to our areas of overprovision?

M. Virtue (Ind)	The noise and rouble from drunk revellers late at night is unacceptable to New Town residents
Hassard Licensing Ltd (Org)	The Board must have regard to the Statutory Guidance published January 2023 when formulating it's Policy. Para 5.6 states "An overprovision assessment must be evidenced based." Para 5.31 confirms the need for the Board to demonstrate a "dependable causal link" been the number/ capacity of licensed premises and the prejudice to one or more of the licensing objectives.

E. Wills (Ind)	As above
J. Archibald (Ind)	It seems blindingly obvious if you happen to be lucky enough to live in the old town. In other countries such an area would be attractive, cleaned regularly and a place where residents would be proud to live in and foreigners would flock to and appreciate. I am not an advocate of tweezeness and hanging baskets - just a clean and pleasant area which is so historic. Having said "historic" I have to admit the old town would have been a bit of a midden centuries ago!
S. Millar (Ind)	Too many pubs and supermarkets selling alcohol until late. A local culture of hard drinking, often combines with drug taking, public drunkenness, public disorder etc. There are streets that contain more or less nothing but pubs eg. Constitution Street, the Shore. There are 'no go' areas such as the Kirkgate, where many local people are scared to go at any time of the day or night.
G. Forbes (Ind)	Public houses and restaurants are essential integrating elements within a community. Many of the new build areas do not provide for these. In addition, post-COVID, several premises in suburban areas have closed, some being replaced by student accommodation. This limits opportunities for integration.
P. Swanson (Ind)	All licensed premises should be judged on individual merits
K. Langenfeld (Ind)	As said above, I do not believe that it's a case of how many but more a case of which
C. Petit (Ind)	Leaving gaps sandwiched between overprovision areas only displaces the issues overprovision orders are trying to resolve or prevent.
D. Race (Ind)	Too many bars and restaurants in that area
Hillside Bowling Club (Org)	See earlier answer
D. Mclauchlan (Ind)	I believe that to drive growth in the hospitality market that desperately needs it, there's needs to be as many opportunities as possible for small business to grow and develop, as this is a key and unique part of the Edinburgh tourism industry
M. Bell (Ind)	no need
Fulbeck House Limited (Org)	N/A
N Kannan	As far as to my knowledge, the areas mentioned above have more than enough licenced premises.
C. Skene (Ind)	The areas that already lie within the over provision sector are adequate but poorly enforced.
R. Harris (Ind)	Same as response to Q6.
Great Grog (Org)	See answer to 6. The idea of overprovision is outdated.
C. Stewart (Ind)	Without under provision, judgement of over provision is impossible.
Juniper Green Bowling Club (Org)	The current areas of overprovision adequately keep people in the city centre etc.
J. Kane (Ind)	I also think 24 hour licensing should be considered in any big city. The ones i have visited seem to have less issues and those that do arise are spread over an evening/day more due to kicking out times being a thing of the past

R. Mackay (Ind)	I fundamentally disagree with the principal of big government. Only where there are clear nuisance issues should the council get involved.
B. Lyon (Ind)	To many already
S. Mitchell (Ind)	We are a cultural and tourist city with increasing numbers of visitors who need places to eat and drink. At times trying to get in somewhere is difficult therefore removing over provision would assist visitors and enhance the city experience. The Council should also campaign to allow amendments to licences to allow families to have a drink without requiring food (as is the case almost everywhere other than Scotland). Lets stop trying to restrict choice and get the economy going.
M. Aikman (Ind)	Within the licensed trade it is well known that many of the issues we are seeing can be attributed to certain licensed premises in the Cowgate area.
L. Johnson (Ind)	I firmly believe that this policy is wrong.
Old Town CC (Org)	These are areas of lots of licenced premises
P. Beswick (Ind)	The problem areas are well known so do not need revision.
P. Barr (Ind)	Even where there are clusters of pubs - Royal Mile, Rose Street, Leith - there is in my view very little serious bad behaviour which might threaten any of the protection objectives.
J. Kalinauskaite (Ind)	The amount of pubs stretching to west end is unnecessary, and make the area unpleasant to live in, particularly the Morrison street and the pubs aloud to open early morning to get people drunk before going to rugby games.
Balerno CC (Org)	BCC has statutory responsibility only in relation to Balerno.
CEC - Public Protection (Org)	Given the concerns for public protection associated with alcohol overprovision, we believe that overprovision should be limited as much as possible. We believe that this is the only way in which the 5 licensing objectives can be achieved.
K. Main (Ind)	Provision seems high
Tollcross CC (Org)	85% of alcohol sales are through off-licences. Off sales result in consumption in uncontrolled places. In 2021, 9.4 litres (L) of pure alcohol were sold per adult in Scotland, equivalent to 18.1 units per adult per week (pw). Excluding the proportion of the population that does not drink alcohol gives a total consumption figure of 11.3L per adult drinker (21.7 units per adult pw). In Edinburgh, 32% of people drink above the Chief Medical Officers' low-risk guidelines (14 units pw). This compares to 23% of people in Scotland who drink above the guidelines. In Edinburgh, 93 people died because of alcohol in 2022, from conditions solely caused by alcohol. The true number of alcohol deaths is over 3 times as high when including conditions such as cancer and cardiovascular diseases.
Leith Bottle Shop (Org)	(refers to email response)
S. Hawkins (Ind)	Past statistics have shown that there is a higher admission rate to hospital for alcohol related problems from this area.
TLT LLP (Org)	We feel that the concept of "overprovision" is outdated.
A. Williams (Ind)	As above, I don't think they're quite fair to smaller businesses.

D. Cairns (Ind)	The area has a higher than average rate of admissions to hospital for alcohol-related illnesses..
M. Birch (Ind)	Too many licensed premises in these streets which is contrary to the objectives set out above
New Town & Broughton CC (Org)	The presumption against grant in an area of overprovision has led to higher standards for any business seeking to trade or vary their operations. While each and every application tend to be approved, it has been through healthy scrutiny by the current Licensing Board. We support this process and believe that it should be extended to densely populated and mixed use areas, such as Leith and Leith Walk.