

Consultation Responses

Ref :	Name & Address	Comments	Officer Comments
1	Superintendent Mark Khan, Senior Operational Commander York & Selby Command North Yorkshire Police	<p>The Police observations after reviewing the document that the Council may wish to consider for inclusion/amendment are as follows:-</p> <ol style="list-style-type: none"> <li data-bbox="595 496 1581 975">1. Para 4.7 refers to Counter Terrorism and a link for Guidance from The National Counter Terrorism Security Office. Following the Government's Protect Duty consultation published in January 2022 the Home Office has pledged to consider legislative approaches requiring venue operators to consider the risk of terrorist attacks and to take proportionate and reasonable measures to prepare and protect the public. Whilst legislation is being considered and devised by the Government it may be beneficial for operators/venue operators to refer to the Protect Duty Consultation document until such laws are enacted, and a link to the document could be attached at Para 4.9 (https://www.gov.uk/government/consultations/protect-duty/outcome/government-response-document). <li data-bbox="595 1015 1581 1270">2. Para 4.12 refers to staff being trained to identify and report issues. For consideration in this section the police would advocate, The WAVE programme (Welfare and Vulnerability Engagement Training) which explores what vulnerability is, how to identify it and appropriate interventions. Operators and Venues would be encouraged to request the training by their local police licensing team. <p>Regarding the Cumulative Impact Assessment Consultation 2022-2025 North Yorkshire Police have provided the City of York Council a Crime Pattern Analysis published alongside this consultation outlining</p>	<p>Paragraph 4.10 added with regards to the Protect Duty</p> <p>Paragraph 4.14 added with regards to the WAVE training.</p> <p>Comments welcomed and noted</p>

		<p>alcohol related Crime and Anti-Social Behaviour within the Cumulative Impact Area. Despite the Covid Pandemic and restrictions on Licensed Premises since March 2020 there continues to be alcohol related disorder within the Cumulative Impact Area, evidenced by the reports and calls for service to the Police. For this reason the Police would support the recommendations for a continued Cumulative Impact Area, including a Red and Amber Zone, due to the high concentration of Licensed Premises within these areas.</p>	
2	<p>Anna Brown Public Health Improvement Officer City of York Council</p>	<ul style="list-style-type: none"> • The existing data and text on alcohol-related health harms in Section 5 are quite old. We include some more up to date information below, with references, which we'd recommend including. We have also commented directly on the relevant part of Section 5 of the draft below. • In future, we see a role for the Licensing Statement of Policy in encouraging licensed premises to go above and beyond mandatory conditions in promoting a healthier culture around alcohol, perhaps through the choice of products offered, pricing structures and messaging in the retail environment. However, we are not yet in a position to make specific evidence-based recommendations, and would like to follow this up with the CYC Licensing team in due course. • Alcohol-related harm is a particular matter for concern in York, with a higher than average rate of alcohol-related hospital admissions, and concerning rates of alcohol-related mortality and alcohol-specific mortality. In the context of an 18.6% increase in alcohol-specific deaths in 2020 across the UK (the highest year-on-year increase on record), collaborative action on reducing alcohol harm is urgently needed. Before the Covid-19 pandemic, there were already national increases in alcohol-related hospital admissions and deaths. The pandemic seems to have accelerated 	<p>Section 5 of the Policy has been updated with the information provided by Public Health.</p> <p>Comments welcomed and noted</p>

these trends.

- Hospital admissions for alcohol-related conditions in York were 1,629 per 100,000 in 2020/21, which is significantly higher than the England-wide rate for the same period.
- In 2020 alone, 69 people died in York of conditions which are wholly or partially caused by alcohol.
- 21.4% of York adults report drinking above the low risk level of up to 14 units per week. This means that 21.4% of York adults are at an increased risk of alcohol-related disease and other long term harm.
- 11.9% of York adults report binge drinking (drinking more than 6 units (for women) or more than 8 units (for men) of alcohol in one day). This population are at increased risk of experiencing acute alcohol related harm.
- There has been a shift in the UK towards drinking at home. This has been partly due to the off-trade sector being able to offer much cheaper prices compared to pubs and bars.
- Those drinking at the highest (and therefore most harmful) levels are more likely to consume the majority of their alcohol at home. This supports analysis that revealed harmful drinkers account for 32% of alcohol-related revenue in the off-trade, compared with 17% of revenue in the on-trade.
- Research by the Institute for Fiscal Studies found that heavier drinkers tend to consume alcohol products that are both cheaper and stronger on average, compared with lighter drinkers. High strength, cheap products are therefore likely to be associated with the greatest harms.

		<ul style="list-style-type: none"> • During the period 2014/15-2017/18, Yorkshire Ambulance Service records show that central York had the highest number of ambulance attendances where the ambulance service have recorded alcohol as a factor at the scene (961 attendances) compared to other areas of the city. 	
3	Local Resident – Groves area York	<p>I notice that there's currently a consultation on licensing policy ongoing within the Council. I understand that the council's powers around licensing are limited, but as a resident of the Groves - an area which undeniably suffers its fair share of alcohol-related issues - I'd like to highlight my concerns around messages in licensed premises around the area that seem actively to support unhealthy and irresponsible attitudes to alcohol consumption. I'd like to take as an example one pub very close to my home: The XXXX on XXXX. This pub has a set of signs on the wall, large enough to be visible even from the street, with messages such as "<i>A beer will always help!</i>" and "<i>I've yet to meet an interesting man who did not drink</i>". This last is a quote attributed to the actor Richard Burton, a notorious alcoholic, whose alcohol-related death at 58 hardly sets him up as a role model for responsible drinking.</p> <p>License holders should be the first to promote sensible approaches to drinking, including through offering low-and no-alcohol alternatives and by displaying positive messaging around moderation. They certainly shouldn't think it okay to display messages that promote reckless (indeed, dangerous) patterns of alcohol consumption, or that seem to pressure people into drinking (e.g. in order to be 'interesting').</p> <p>Again, I understand that the council cannot necessarily solve problems like this overnight, but I do think you should be doing everything in your power, including through your approach to licensing, to discourage negative alcohol messaging and to promote</p>	<p>Comments welcomed and noted</p> <p>Paragraph 5.18 added</p>

		responsible attitudes to the sale of alcohol. I hope you will take this feedback onboard as you review licensing policy within York.	
4			