

Consultation Responses

Ref :	Name & Address	Comments
1	Premises Licence Holder	<p>Tokyo Industries are a highly experienced Late Night Operator with over 47 sites around the UK and 19 Internationally - we know and understand the benefit that a Late Night Economy brings to any city. In York we operated Fibbers for over a decade before the building had to be sold - we still operate Impossible, The Impossible Motel, Pink and Forage in York City Centre and the City is a fraction of what it once was.</p> <p>Please accept as a formal observation and query as to the new CIA. The late night and licensing landscape has changed substantially since the introduction of the CIA many years ago, it is no longer fit for purpose.</p> <p>There has been a massive contraction in the number of visitors to York post COVID and Licensed hospitality is a fraction of the occupation it once was. We have lost a number of significant venues Fibbers etc in recent years and the late night leisure in York CC is now at a fraction of its previous trading levels.</p> <p>Hospitality needs the support of new entries into the market place - new independents who create culture and drive the late night economy - which in turn fuels taxis, hotels and retail. A city is only successful with all components work together - I plead with the council's licensing team to drop the notion of a CIA need entirely and open up for barriers to entry of new and exciting business that we help keep York ahead of its failing rival cities locally.</p> <p>We can keep our City controlled with usual 'Licensing' Standards - the 'Absolute' no of a CIA stifles new business and impacts our Cities economy.</p>

		<p>There have been many examples nationally of Cities dropping CIAs to all but positive response - we urge York CC to consider dropping the CIA entirely. It's dated and no longer relevant - Licensing Policy does exactly the same controls with the 'Absolute No' of a CIA.</p> <p><i>Officer Comments:</i> <i>The CIA is not an absolute 'no' to applications for new licensed premises within the city centre, each application has to be considered, by the council and responsible authorities, on its own merits, applicants for a new licensed premises and varying the licence of an existing licensed premises must demonstrate through the operating schedule within the application form, how granting their licence will not add to the cumulative impact.</i></p>
2	Premises Licence Holder	<p>I just received a letter from York city council for review license for the area it's a night club and hotel district, but it's only a night club it's here it's salvation it's only open 3 days a week it's Wednesday and Friday and Saturday. From 15 December to 30 January just open a day in week which it's Saturday, and every year from middle of June to middle September just open A days in week this situation brings this area to a Ghost Town. Popworld and Flares are a regular pub not a night club. My opinion its Salvation have to be open more days in week or city council released a new night club for this area to back to live and support local business.</p> <p><i>Officer Comments:</i> <i>It is for the owner/operator of Club Salvation to determine the days/hours the premises open.</i></p> <p><i>The council does not release new nightclub licences, the council, and responsible authorities, must consider every application for a new premises licence on its own merits.</i></p>
3	York Publican	<p>York over the past 10 Years has increasingly become known for its party vibe and nightlife culture however the council and police services are not effectively managing this situation. Lots of tourists on a weekend particularly are not visiting York for the history; they are visiting to get drunk. This within itself is not a problem and indeed it keeps our licensed venues ticking over;</p>

but it's poorly managed. If we are to attract even more of this clientele (and or retain this nightlife culture of which business and the city economically benefit from) then the council must wake up and address this to make it safer for visitors.

Officer Comments:

Sections 4.18 & 4.19 of the Policy encourages applicants and licence holders to promote customer safety, asking them to engage with Police and partner operations to tackle issues – the Police and Council can't do this without having the support of the licence trade.

In the city centre and slight outskirts licensees are seeing more & more issues related to excessive drunkenness including violence. Of course, this to some extent is inevitable, the more people visiting the higher the possibility of crime... but it could be handled much better.

- The lack of Taxi ranks and lack of Marshalls to ensure getting a taxi is efficient and orderly for people wanting to go home when they have had enough to drink. People are loitering after leaving pubs in the City centre for too long and causing nuisance. Licensees are left to deal with this despite these people maybe never frequenting our establishments that evening.

Officer Comments:

York BID, with the help of some partners, funds the provision of Marshals at Duncombe Place and St Saviourgate taxi ranks on Friday and Saturday, and some Bank Holiday Sunday, evenings at the busier time of the year.

- A shocking lack of police presence on Friday/Saturday nights. Not only are the police a deterrent for crime occurrences they provide safety to members of the public in need and safety to the licensed establishments by being readily available and present until the early hours.

Officer Comments:

This comment has been shared with North Yorkshire Police.

- As a landlady on Blossom Street, we see a lot of racegoers frequenting the course on race days. These are probably one of the biggest public events in the York Calendar. Yes, Door security is advisable however, what about the people on the street walking around full of ale that they have brought from home or the local shop who are behaving unpleasantly; we may not have served them the alcohol yet we are left to deal with it due to the lack of Policing. Racegoers are being served a lot alcohol at the racecourse then leaving the course full of beer and being nuisances/violent and we are left to 'deal' with alone despite the race course having the largest slice of the pie in a financial sense.

Why should we have to foot the bill for extra security when we are not being met half way by our own police force? We are business rates and tax payers just as much as York racecourse is yet the surrounding pubs in the heavy footfall on route to and back from the course are left high and dry to deal with this alone. A stronger police presence, similar to those at football matches (whereby the racecourse can attract the same numbers as stadiums can with football fans) must be present in this immediate area from the course to the city centre. I would suggest in a 1.5-2 mile radius must be applied.

- I believe all pubs in a 1-2 mile vicinity on major race meets should be enforced to use plastic glassware to reduce the risk of harm to the public-helping us ensure we are upholding our licensing obligations correctly. I would even stretch this to late night bars/establishments in the city centre during busy periods (Saturday nights/events) in the same way as other large 'party' cities have done.

Officer Comments:

This comment has been shared with North Yorkshire Police.

On most race-days (this is risked assessed), especially the larger days, Police resources are at the Racecourse.

On most race-days (this is risked assessed) the Police have resources in place to monitor/tackle any issues on the route from the Racecourse to the City Centre. The police continue to work with partners and deploy resources into the City Centre.

-Fake Id. We have seen increasing numbers of under age people producing fake ID. These Id's are often very very good and can easily catch publicans and staff out. Where does York Licensing stand on supporting publicans who have been victims to this scam despite having good due diligence in their establishment? Is it fair to assume we are serving young people underage carelessly when we are checking their ID and with the access we have to 'UV lights' and basic checking equipment these are on face value- genuine?

Officer Comments:

If premises licence holders deem there is a safety risk, so that the licensing objective 'public safety' is not undermined, they should implement the use of polycarbonates or plastic.

If reports of underage sales are received by the Council and/or Police, depending on the nature of the report, a stage approached to enforcement would be undertaken, meeting with the premises licence holder and/or designated premises supervisor would be undertaken to ascertain the due diligence that is in place, for example records of ID checks and refusals.

I believe York Licensing board and North Yorkshire police are falling far behind the measures that are applied in other cities where nightlife is particularly popular. Perhaps it would be worth engaging with councils/police forces from Manchester/ Leeds/ Newcastle etc to see how they are better managing their late night economy. We have a thriving student population and a reputation in the city of good pubs and licensed premises with locals and visitors alike. But I fear if this situation is not better controlled, we will lose this and I do not hope it will take a very bad incident for the council to then wake up and deal with it as the city centre on a weekend is

		<p>not always a pleasant place to be. Indeed, many 'locals' do not frequent the town at all on these days and this is really not the attitude the good people of York should be holding.</p> <p><i>Officer Comments:</i> <i>Council and Police Officers do engage with and share best practice with other authorities / forces.</i></p> <p><i>The Council and Police are aware that York is a popular city for day trippers and weekend visitors, due to our excellent rail links, who come to the city to visit the pubs and bars which can create an increase in ASB. We have worked with Partners and the licence trade to tackle the issues associated with these, such as introducing the 'Code of Conduct'.</i></p>
4	Premises Licence Holder	<p>Thank you for inviting feedback as part of the review of York's Cumulative Impact Assessment. As a licensee in York for over 50 years, I have witnessed significant changes in the city's hospitality landscape and feel compelled to share my observations and concerns regarding the current trends and their potential impact on York's unique character, public safety, and resources.</p> <p>Recent trends in weekend hospitality have shifted significantly towards the concept of 'all-day bars.' These establishments combine alcohol sales with food offerings (such as bottomless brunches)) screened sports events, and music. Many of them transform into dance floors and party spaces in the evening, functioning as small-scale nightclubs.</p> <p>Operators like NEOS Hospitality, which has absorbed much of the former Rekom nightclub portfolio, have publicly stated their shift away from traditional nightclubs toward this 'party bar' model. While such venues may be popular in city centres, they often bring with them a brash and loud atmosphere that detracts from the historic and cultural appeal of York's city centre.</p> <p>This shift seems to be a response to the decline of the traditional nighttime economy. Former nightclubs and late-night bars have increasingly transitioned to operating extended hours—12-</p>

hour trading periods on Saturdays (e.g., 12:00 pm to 2:00 am) are now commonplace. The emergence of party bars operating throughout the day and into the early hours reflects a concerning trend, particularly as these venues are often run by large operators with a focus on volume rather than quality. This raises questions about York's reputation as a destination that offers something distinct and refined compared to other cities.

Nightclubs, in particular, are increasingly the preserve of under-25s, most of whom are students. Students continue to enjoy nights dancing and socialising with peers of their own age and tend to have some disposable income, albeit modest. The number of students living in the city centre is rising significantly due to the considerable building projects aimed at university students. It is important that this demographic is catered to with relevant and safe venues that provide a welcoming and secure environment for their nighttime activities.

In addition, the proliferation of late-night venues across the city, often serving all customer bases in all areas, has created challenges for policing and resource allocation. What was once a more localised late-night economy, contained to specific streets or districts, has become dispersed. This expansion stretches enforcement resources and makes it harder to manage public safety effectively.

Officer Comments:

The introduction of the Licensing Act 2003 removed the restrictions regarding operating hours and classifications of pubs, restaurants and nightclubs that were in place under the Licensing Act 1964.

Since the introduction of the 2003 Act nightclubs are no longer the only venues customers can frequent after 11pm, as pubs/bars now have and can apply for licences into the early hours of the morning, with styles of trading changing throughout the operating hours – the 2003 Act allows applicants for apply for 24 hour licences 7 days a week.

		<p><i>Each application for a grant or variation of a premises licence must be considered on its own merit, applications for premises within the CIA must demonstrate through the operating schedule how the granting of the licence will not add to the cumulative impact.</i></p> <p>One way to address this issue is through clearer distinctions in the licensed hours of restaurants, bars, and nightclubs. Such distinctions would help localise trade, ensuring specific areas of the city remain tailored to particular hospitality offerings. Localisation would make it easier to allocate resources effectively, concentrating policing and public services in key areas during peak hours, rather than spreading them thinly across the entire city.</p> <p><i>Officers Comment:</i> <i>The 2003 Act has removed these distinctions. If they wish, an applicant can give a clear distinction through the operating schedule and/or, while considering the application on its own merits, responsible authorities can do this by agreeing licensing conditions or the licensing authority can do this if relevant representations are received.</i></p> <p>I sincerely hope York does not invite this kind of ‘all-day party bar’ culture—offering breakfast through to last orders at 2:00 am—resembling destinations like Magaluf. York’s charm lies in its historic appeal, unique character, and vibrant but balanced nightlife. Allowing the proliferation of such venues risks undermining these qualities and creating long-term issues for both residents and visitors.</p>
5	Professor University of York	<p>Section 16. Noise Complaints</p> <p>Increases in noise complaints relating to hospitality have increased nationwide since Covid. Anecdotal evidence reported in the Morning Advertiser¹ suggests that these are related to new residents (either moving into an area during the hospitality covid closures or new properties or conversions during this period) or residents who became used to less noise during covid. It</p>

¹ Maurice-Jones, A. (2023) Why are noise complaints shutting down music venues? The Morning Advertiser, 10th february 2023, available at: <https://www.morningadvertiser.co.uk/Article/2023/02/10/Rise-in-noise-complaints-threatens-late-night-sector/>

would be useful to see this impact noted in the policy.

Officers Comments:

Reference to Covid has been added to paragraph 16 of the CIA.

Occurrences (sections 18-32)

This section outlines occurrences of various types of crime. However, there is no evidence provided which shows these are directly related to licenced (and related) venues.

This section relies on correlation (a crime occurred in the area where there are many licenced/off-licence premises) rather than examining causation (whether the licenced premises, or people visiting them were the cause of the crime). This may mean that more crime is attributed to licensed premises etc, and those visiting them than is actually the case.

A stronger evidence base, or a deeper analysis of the evidence base, is required to examine how these crimes/issues relate specifically to venues.

These assumptions continue within the section on 'Location' where correlation is relied upon.

Officers Comments

The CIA data gives an overview of the crimes within the area, and the locations that have the highest levels of these crimes – specific licensed premises are not identified. Each application would be considered on its own merits, any specific crime pertinent to the application would be discussed with the applicant.

Comments on Statement of Licensing Policy 2025 – 2030

Section 3.3

This section notes the number of rail passengers each year at over 10 million. Is this 10 million who pass through on the rail line or visitors? How does this 10 million, or a subset of it relate to York specifically?

Officer Comments:

This information was taken from Rail Strategy documentation. As York attracts 8.9 million visitors a year, and people come to York to work, for businesses meetings and conferences, millions of people come to the city each year by train.

Section 4.17

As with other sub sections in section 4 would it be possible to include facts/figures on levels of hate crimes to provide a baseline for future reporting.

Officer Comments:

A link to the Home Office official statistics has been added.

Section 4.18

See also comment on occurrences above. This section asks applicants/licence holders to “engage with Police operations (which may also include partners) that are in place to tackle alcohol related issues, such as violence, ASB, street drinking and thefts.” Could evidence be provided (or linked to) as to which specific issues are related to licenced premises.

This section also asks applicants/licence holders to “engage with York BID rangers, Street Angels and if your premises is in close proximity to the river York Rescue Boat volunteers” can it be made more clear how close proximity can be understood as all of the centre of York is relatively close to the river?

Officer Comments:

Section 4.18 encourages applicants and licence holders to engage in national and local schemes to promote customer safety – therefore it is for the applicant or licence holder to determine in their premises is in close proximity to the river.

Section 5.4

This section notes that ‘drinking behaviour has changed in the last ten years’. How has this been recorded/evidenced or is this anecdotal?

Officer Comments:

The licence trader, police, public health and council officers have noted these changes.

Section 5.13

“Local Police records indicate that alcohol consumption was one of the main vulnerabilities associated with domestic abuse crime across North Yorkshire, recorded in 30% of domestic abuse cases, [...]” is there a distinction between on and off trade alcohol consumption which might affect this?

Officer Comments:

Statistics just state that ‘alcohol was a factor’.

We are aware that some domestic abuse incidents taking place in on-trade venues may be recorded as violent incidents but not specifically flagged as domestic abuse crimes, so our understanding could still be incomplete.

Section 5.15

This section notes that “with heavier drinkers drinking more and lighter drinkers drinking less”. Where is the evidence for this? And again was there a split between on vs off trade?

Officer Comments:

Various reports and publications have observed the impact of the Covid 19 pandemic on alcohol consumption being ‘heavier drinkers drinking more and lighter drinkers drinking less’, including:

- [Modelling the longer-term health and health inequality impacts of changes in alcohol consumption during the COVID-19 pandemic in England | Journal of Public Health | Oxford Academic](#)
- [The-COVID-Hangover-report-July-2022.pdf](#)

- [Monitoring alcohol consumption and harm during the COVID-19 pandemic: summary - GOV.UK](#)

A key source of data for these reports was the Alcohol Toolkit Study: [Monthly Tracking KPI - Graphs - Alcohol in England](#)

Angus, Henney and Pryce (2024) analysis of the Alcohol Toolkit data states “Across all population subgroups, lower-risk drinkers (AUDIT score of <5) reduced their drinking during the pandemic, whereas risky drinkers (AUDIT score of 5+) increased theirs.” This did not examine where people purchased their alcohol.

If the pre-pandemic trend still holds true, it is likely that people drinking at harmful levels account for a higher proportion of alcohol-related revenue in the off-trade compared to the on-trade, but the lead researcher, Aveek Bhattacharya, who conducted this analysis has not conducted and was not aware of an update of their work when we made contact in August 2024.

Section 5.18

This section notes that high strength lager and cider is “favoured by people drinking on the street”. Where is the evidence for this?

Officer Comments:

This has been noted from the evidence (empty cans/bottles) left in known street drinker locations, and from information provided by officers who try to tackle/address street drinking issues.

Section 5.21

This section highlights the importance of alcohol sales and notes the inclusion of low and/or alcohol free versions. The section rightly suggests that this should be competitively priced but the literature² also suggests that (and could be further inclusions):

- Consumers would welcome price promotions on nolo products (as these are often not available);
- Consumers would welcome more visibility of nolo products (i.e. on bar tops, clearly marked in fridges, and availability on tap, potential online promotion);
- Licenses welcome nolo products so they are available for staff members (given that publicans and hospitality staff are at high risk of developing alcohol problems³).

Officer Comments:

Additional line added to 5.21.

Section 5.22

This section states that “Promotions of alcohol-free alternatives that share branding with alcohol products should not appeal to children”. Could this be further explained/evidenced. There is no robust evidence that nolo products are a gateway to alcoholic products and therefore this requires further explanation.

Officer Comments:

Advertising alcohol-free alternatives that share branding with alcohol products by their nature

² Waehning N., Wells V., Sohn F. (2024) The impact of nudges to increase alcohol free beer/reduce regular beer sale in bars and public houses: A field trial. *Work in progress.*

Wells, V and Waehning, N. (2024). Alcoholic Beer (NAB) Consumption- A Q-Methodological Analysis. *Work in progress.*

Waehning, N and Wells, V.K. (2024) Product, Individual and Environmental factors impacting the consumption of no and low alcoholic drinks: A Systematic Review and Future Research Agenda, *Food Quality and Preference*, 117, 105163

³ Thompson, A., Pirmohamed, M. Associations between occupation and heavy alcohol consumption in UK adults aged 40–69 years: a cross-sectional study using the UK Biobank. *BMC Public Health* 21, 190 (2021).

contribute to awareness and salience of the core (alcoholic) brand; it is therefore inappropriate for such marketing to appeal to minors.

In addition to this, a more general point that is not only relevant for no/low drinks that share a brand with an alcohol product, but relates to all no/low drinks, is that the government is clear that alcohol substitute drinks are intended for consumption by adults and should not be sold or supplied to children, and is working with alcohol producers, retailers and trade bodies to ask that they reflect this position in codes and guidelines (see [Updating labelling guidance for no and low-alcohol alternatives: consultation - GOV.UK](#)). It is therefore appropriate that marketing practices should align with this.

Section 5.23

Licenses could be encouraged to list no/low drinks earlier in the app to ensure visibility and convenience which studies show is sought by consumers.

Officer Comments:

This section relates to the safe sale of alcohol with regards to under 18 year olds.

Section 9.14

This section states that for an application in the CIA to be considered more favourably that the application should be primarily food led, with no vertical drinking and with table service only. This suggests that traditional pub environments which are often wet led with bar service and provide important community spaces will not be looked on as favourably. This is in contrast to the earlier statement in section 6.4 which states “the Council recognizes the important part traditional and historic public houses play in our cultural and tourism heritage and would seek to preserve and enhance those assets for future generations”. By making it harder for traditional venues (which are often largely wet led and bar service operations) to get and maintain licences goes against this stated objective. While the document highlights that diversity of operations should be welcomed (see section 6.4 - “the council strongly supports a mix of the

different types of licensed premises, particularly in areas where there is a high density of such premises”), these considerations mean it is harder for the diversity (and especially more traditional venues and pub prices) to actually take place.

Officer Comments:

The section relates to an area within York city centre which has been identified because evidence shows that the cumulative impact of the number and concentration of licensed premises in this area adversely affect the promotion of the licensing objectives.

Applicants for the grant of a new premises licence or variation of an existing premises licence must demonstrate through the operating schedule how the granting of the licence will not add to the cumulative impact.

Each application must be considered on its own merits.

Jed Meers (University of York) highlights⁴ issues relating to the focus on dry led venues and reducing vertical ‘civilised drinking’ and a heavily classed process which goes against more traditional venues.

Waehning, N and Wells, V.K. (2024) Product, Individual and Environmental factors impacting the consumption of no and low alcoholic drinks: A Systematic Review and Future Research Agenda, *Food Quality and Preference*, 117, 105163

⁴Meers, J. (2021) From “wet led” to “dry led”: Food and the contested framing of alcohol establishments, In D.Clarke, V. Ellis, H.Patrick and D.Weir (eds) *Researching Craft Beer*, Emerald.

Meers, J. (2023) “Vertical drinking” in the night-time economy: alcohol licencing and proxies for “uncivilised” drinking bodies, *Leisure Studies*, 43(5), 722-738