



PBDevco Response to Aberdeen City Draft Licensing Policy

Aberdeen City's draft licensing policy for 2023 is vastly identical to the Statement of Licensing Policy of November 2018. This could be due to the transformational process that was put in place to make the policy simplified so it could be easily understood and interpreted by the masses, rather than a policy used solely by Solicitors. Nevertheless, it is disappointing to see that the licensing landscape of 2023 remains almost exactly the same as in 2018, in particular, with the challenges that Covid and the post-Covid era have hit the hospitality industry.

The Policy still holds points that Licence Holders are expected to uphold and some of the guidance expected them is vague. Licence Holders will require further clarification to allow them to fully understand their obligations and therefore comment comprehensively on the draft policy. Much of the policy is based upon "appropriate conditions" that are not definitive so it is hoped that these conditions will be based on a case-by-case approach whereby Licensed premises that make a positive contribution to the nighttime economy and can evidence an investment in safety and security measures, ongoing staff training and social responsibility promoting the licensing objectives should be awarded.

2023 saw the Port of Aberdeen open and the city was awash with cruisers in the morning queuing at the gates of our venues to order alcohol within beautiful, licensed premises. Is still having a 15-hour continuous stifling the diversification of our city? Licensed premises are now no longer divided into different classifications such as bar, pub, or nightclub within Aberdeen instead many venues are choosing to operate as a hybrid venue to capture as much trade as possible to keep their businesses afloat. Should these hybrid premises be able to accommodate certain types of clientele in the mornings, afternoons, and early evenings before transforming into a late-night venue rather than being penalized as they have already been open for 15 hours? We should be encouraging a dynamic, vibrant, and evolving licensed trade on an international level whereby businesses that offer a fantastic product in a safe environment thrive. The draft policy references General Extensions however as of 8th November, none as yet have been granted by the Licensing Board for 2023 and many applications that have been sought at Board level have been ridiculed. Therefore, what and when is deemed an acceptable extension for a Licensed Premises?

Correspondence regarding Licensing Policy from the Licensing Standards Officers, whereby guidance is a key part of their role, is poor, and frequently Licence Holders receive information disseminated from our Licensing Solicitors rather than directly from them or the Licensing Board. Surely this then counters all the work done to ensure that Licence Holders are capable of following the policy without legal assistance?

Covid has created an increased desire for outside drinking and dining. Similarly, the European 'café culture' that Aberdeen City Council strives for supports alfresco hospitality. Therefore, why is the Supplementary Policy on External Areas of the draft policy determined to curtail this ambiance with its traditional rules that don't align Aberdeen with its forward-thinking City Centre Masterplan? Will these conditions still be applicable to venues that have been proven to operate safe, well-managed venues? Should these conditions be applicable all year round or could they be established seasonably or fall in line, if and when general extensions are granted? Unquestionably, these conditions should also be on a case-by-case basis to keep Aberdeen synchronized with our fellow Scottish counterparts.