

**OFFICIAL**

Date: 19/07/2023

Our Ref: LICPOL/IR

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PA1 1JU

Dear Mr Campbell,

## **RENFREWSHIRE LICENSING BOARD'S STATEMENT OF LICENSING POLICY**

I refer to your correspondence dated 1<sup>st</sup> May 2023 and on behalf of Police Scotland I would offer the following comments for consideration of the Board.

### Licensing Hours

Having regard to the Board's current policy, the Chief Constable has not identified any issues with regards to its' provisions in terms of licensing hours, and is satisfied there is sufficient opportunity under its' terms and under those of the legislation, to allow Police Scotland to make pertinent comment on individual cases as and when a need arises. Accordingly, the Chief Constable does not propose any amendment and would not wish to make further comment.

### Children and Young Persons

Similarly, in regard to the above, the Chief Constable is satisfied that the provisions of the current policy serve and have served Children and Young Persons well in Renfrewshire. In the absence of any substantial increase in the prevalence of incidents or crimes involving Children and Young Persons in Renfrewshire licensed premises, the Chief Constable has no comment to make, nor amendment to propose.

### Occasional Licences/Extended Hours

In terms of Occasional Licences and Extended Hours licences, once again, the Chief Constable remains satisfied that the arrangements existing under the

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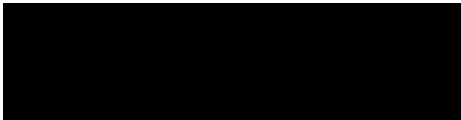
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current policy allow Police Scotland sufficient scope to make comment and/or representation when necessary in individual cases, and to have a sufficient degree of oversight and control over occasional and extended hours licences generally. Accordingly, the Chief Constable has no comment to make nor amendment to propose.

Overprovision

I have enclosed the Renfrewshire Licensing Overprovision Assessment which has been developed by our Analyst Co-ordinator. The analysis clearly identifies an area of overprovision in Paisley Town Centre, with a significant overlap in terms of the main hotspot area for licensed premises, violent crime and ASB within the same area. It should be noted that this analysis takes into account on-sale provision only.

Yours sincerely



Laura Waddell  
Chief Superintendent  
Divisional Commander

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**POLICE  
SCOTLAND**

Keeping people safe

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## **RENFREWSHIRE LICENSING – OVERPROVISION ASSESSMENT**

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<b>Author</b>	Derek Middleton Analyst Coordinator
<b>Date of production &amp; Tasking ID</b>	09/02/2023 T022_23

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### AIM

To provide an assessment as to the current provision of licensed premises within Renfrewshire, specifically identifying any 'hotspots' of licensed premises and whether these bear any relationship to hotspots for violence and antisocial behaviour (ASB) within the Local Authority Area.

### DATA

Data relating to licensed premises operating within Renfrewshire was provided by the Renfrewshire & Inverclyde Licensing Department.

Crime data for the period 2018 – 2022 was extracted from ScOMIS, crimes for inclusion being common assault (including assault of emergency worker), serious assault, robbery (including assault with intent to rob), attempted murder and murder.

Incident data for the period 2018 – 2022 was also extracted from ScOMIS, incorporating all relevant ASB codes.

### CONCLUSIONS

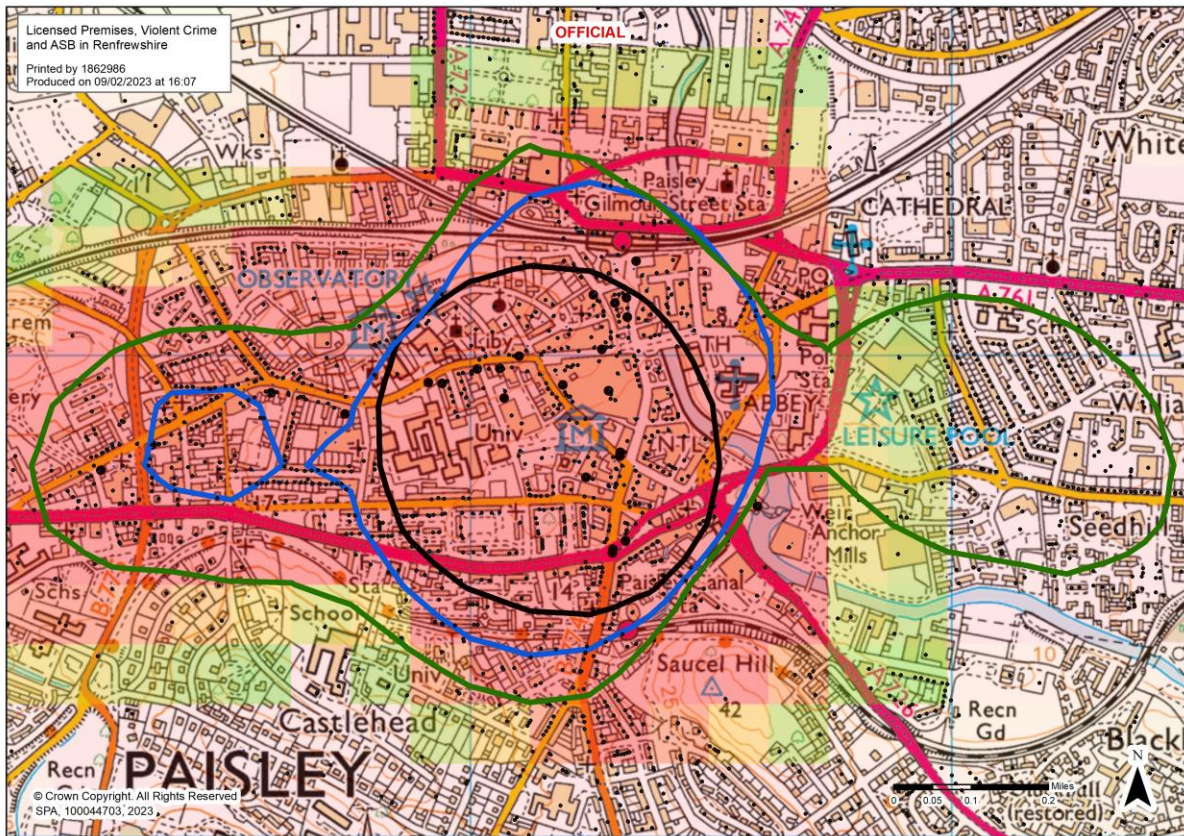
- Analysis identified a high degree of overlap in terms of hotspots for licensed premises in Renfrewshire and areas with a high concentration of violent crime and reports of antisocial behaviour.
- The principal 'hotspot' for licensed premises identified within Renfrewshire was Paisley Town Centre (see Map 1) – covering an area of 0.38 square kilometres.
- The primary hotspot for violent crime predominantly overlapped the licensed premises hotspot in Paisley Town Centre, albeit this extended over a wider area (0.68 square kilometres). It is likely that a higher level of footfall in the surrounding area associated with foot traffic to and from the primary night time economy area in Paisley is a contributor to the violence hotspot which extends beyond the borders of the identified licensed premises hotspot.
- The primary hotspot for reported incidents of antisocial behaviour also significantly overlapped the licensed premises hotspot in Paisley Town Centre, although the ASB hotspot covered a significantly larger area that extended well beyond the bounds of the licensed premises hotspot. As before, it is likely the concentrated area of licensed premises in Paisley Town Centre contributed to this wider spread of ASB incidents due to increased footfall to/from the night time economy area and the contribution of alcohol to such incidents, including on the surrounding area.
- The analysis would suggest that there is a high correlation between increased concentration of licensed premises and the occurrence of violent crime and disorder. It is therefore recommended that the licensed premises hotspot

located in Paisley Town Centre (as shown on the following maps) is regarded as an area of current overprovision.

## KEY TO INTERPRETATION OF MAPS

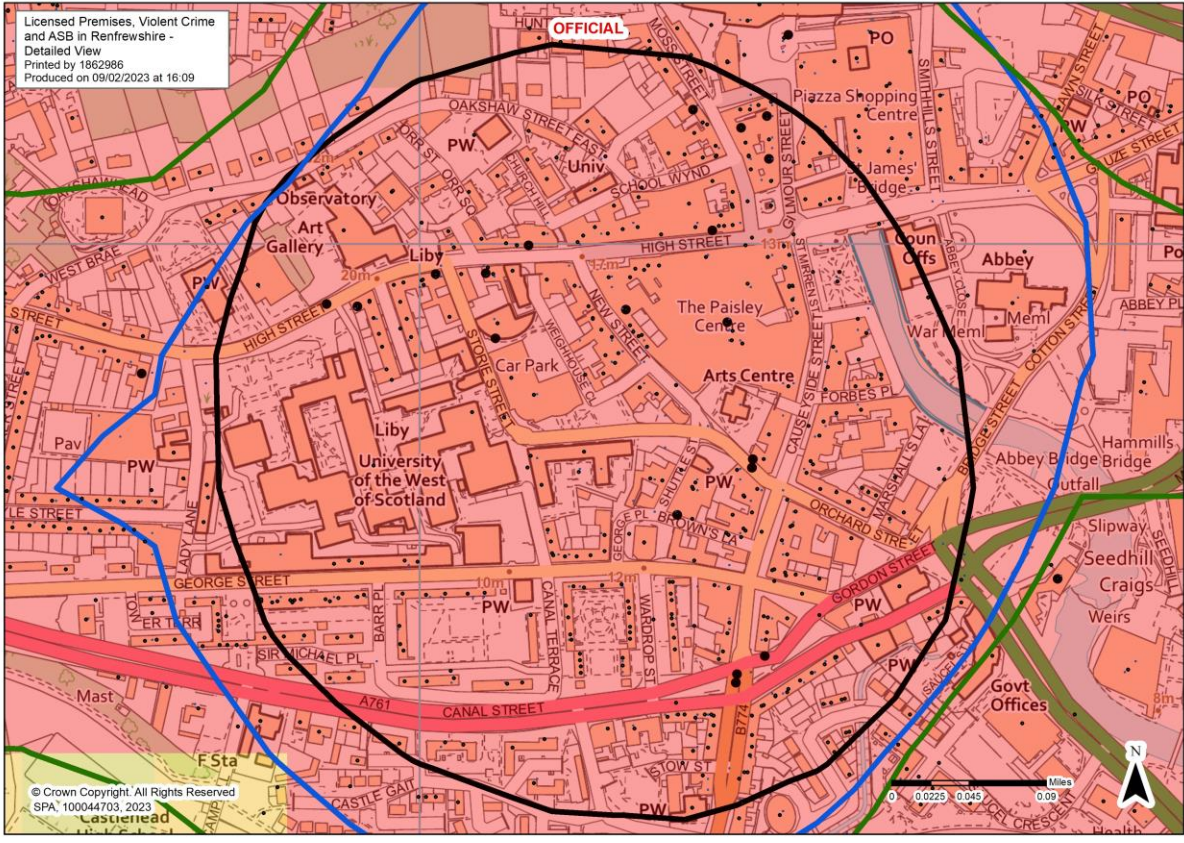
The circular black contour line denotes the identified licensed premises hotspot, with black dots identifying the location of specific licensed premises. The blue contour indicates the identified hotspot for violent crime in Renfrewshire, while the green contour shows the hotspot for antisocial behaviour incidents. The area contained within the circular black contour line is therefore the area identified for consideration as having ‘overprovision’, due to the high degree of overlap between concentration of licensed premises, crimes of violence and ASB incidents within this zone.

## MAPS





Licensed Premises, Violent Crime  
and ASB in Renfrewshire -  
Detailed View  
Printed by 1862986  
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SPA 100044703, 2023

**Paper Title: Renfrewshire HSCP Response to Formal Consultation on Statement of Licensing Policy 2023**

**Date: 19<sup>th</sup> July 2023**

**Authors: Jim McSorley**

The response has been prepared by Renfrewshire Health and Social Care Partnership (HSCP), in conjunction with Renfrewshire Alcohol and Drug Partnership (ADP) and NHS Greater Glasgow and Clyde Public Health Department. This response has been assembled to assist the Licensing Board within the following areas as per the formal consultation guidance documents:-

- Overprovision – Paisley Town Centre
- Licensing Hours
- Childrens and young persons' access to licensed premises
- Occasional licences
- Licensing Conditions for Alcohol Delivery

### **1.0 Overprovision – Paisley Town Centre**

Alcohol is responsible for significant levels of morbidity and mortality (Scottish Health Survey, 2015). Research shows that higher availability of alcohol is associated with alcohol-related hospital admissions and mortality for all alcohol-related conditions in general, and for liver cirrhosis (Richardson EA, 2015) and is associated with:-

- increased overall alcohol consumption
- greater average levels of drinking among students
- alcohol-related violence
- self-reported injuries
- alcohol-related road traffic crashes
- sexually transmitted infections (STI)
- child abuse and neglect
- suicide
- domestic violence

Availability of alcohol refers to how easy it is to purchase alcohol either from on sales such as pubs, restaurants or clubs or off sales like supermarkets and shops. Research carried out over the last few years has clearly shown an association between alcohol availability and alcohol related harm.

At its meeting on 27<sup>th</sup> of April the Licensing Bgoard proposed Paisley Town Centre as the area it wished to propose as overprovided within Renfrewshire.

We note that Paisley Town Centre falls within the Paisley Central Intermediate Zone area and has a higher rate of alcohol harms than both the National and Greater Glasgow and Clyde with regards Alcohol related deaths and Alcohol Related Hospital Admissions:

Studies from other countries have consistently found an association between alcohol availability and alcohol-related problems, particularly outlet density (the number of alcohol outlets in a given area). Previous research carried out in 2014 by Centre for Research on Environment, Society and Health at the Universities of Edinburgh and Glasgow (CRESH) suggests that this relationship is also true for Scotland.

This CRESH research identified the existence of an outlet availability threshold of 6 off sales, 9 on sales or 14 total outlets within 800m – below which hospital admission rates do not differ but above which rates increased significantly.

The Paisley town centre area as identified by the Licensing board, which has a considerably smaller area than the 800m radius used within the CRESH research, has 23 licenses with 20 on-sale and 3 off-sale licenses and as such, taking this and the alcohol harms data that Renfrewshire HSCP have, we would support this area being deemed as overprovided within the policy for both On and Off Sales premises.

## **2.0 Licensing Hours**

Evidence clearly shows that reducing the availability of alcohol can reduce alcohol related harm. Renfrewshire experiences amongst the highest levels of alcohol related harm in Scotland. The 2022 MESAS report compiled by NHS Health Scotland (2021) showed that the majority of alcohol is purchased in off sales premises. In 2021, 85% of all alcohol sold in Scotland was sold through the off-trade (supermarkets and other off-licences) an increase from 72% in 2019. This change in purchasing patterns can be linked to the COVID-19 pandemic however the current cost of living crisis may mean this trend continues. Reducing off sales opening hours by at least one hour or more would contribute to an overall reduction in alcohol availability, ultimately reducing alcohol related harm and be congruent with the licensing objectives of preventing public nuisance and protecting and improving public health. As such Renfrewshire HSCP would ask the board to consider implementing the following:

1. The commencement of off sales on a Sunday should be restricted to 11am for future licensing applications.
2. Renfrewshire HSCP would also welcome the restriction of the licensed hours for new off sales licensing applications earlier than the current terminal hour of 10pm would have the same impact as restricting opening times.

## **3.0 Children and young persons' access to licensed premises**

There is overwhelming evidence that children who see adults consuming alcohol to excess regard this behaviour as relatively normal. This has resulted in children and young people commencing alcohol consumption at an earlier age and consuming more alcohol than non



exposed peers. Children and young people who have adopted heavy drinking at a young age are more likely to continue to drink heavily as adults and to develop significant alcohol related health problems and dependence in later life (Palmer et al 2010).

The Scottish Schools Adolescent Lifestyle and Substance Use Survey (SALSUS) shows there has been a decrease in underage drinking in Renfrewshire from 2013 to 2018 however, it still remains a concern.

- 34% of 13 years and 72% of 15 year olds reporting they have had a drink of alcohol
- 80% of 15 year olds and 54% of 13 year olds thought it was ok for someone their age to try alcohol highlighting the need for intervention that address attitudes.

In 2021/22 83% of children on the Child Protection Register in Renfrewshire had concerns identified around parental alcohol use or parental substance use (alcohol and drugs) and Renfrewshire HSCP believes action has to be taken to tackle the normality that alcohol is being seen within society and support mitigation of alcohol use among children and young people and to alleviate alcohol related problems associated for our young people in later life.

In order to promote the licensing objective of protecting children and young persons from harm in premises where children (0-15 years) and young persons (16-17 years) we believe premises that children and young people are known to frequent and use the services provided within such as barbers/ hairdressers, beauty salons, sports centres and community facilities such as libraries and community centres be excluded from selling alcohol.

#### **4.0 Occasional licences**

Occasional licenses increase availability of alcohol and can impact on the licensing objectives. The nature of Occasional licenses makes the monitoring of alcohol outlets difficult with new premises currently able to use Occasional licenses to provide alcohol for an indefinite period. This practice allows some premise to continually sell alcohol without the requirement for the full governance that a premises licence application submission to the board brings and as such Renfrewshire HSCP would support the approach that if any applicant repeatedly applies for an occasional licence, then they should submit an application for a premises licence after a 13 week period. This additional governance would provide ample opportunity for premises to trial alcohol sales or a new business model for a prolonged period or time but also bring governance that would support all licensing objectives through completing the process of a premises licence in a timely manner.

Additionally Occasional licenses are often used to enable alcohol to be available at events often attended by children such as sports events, fundraisers and market places. As such Renfrewshire HSCP believe applicants should be asked to justify their reason for applying for a liquor licence (occasional) for occasions where children and young people are in attendance. Renfrewshire HSCP suggest a way of increasing governance around events that have applied for an occasional licence and that children and young people likely be in attendance would be to broaden those groups who receive notification of these applications to include all appropriate statutory consultees for Premises Licensees and allow 21 days for responses from all parties. Renfrewshire HSCP believe this change would support the licensing objective of protecting children and young people from harm.

## 5.0 Licensing Conditions for Alcohol Delivery

Alcohol deliveries and internet sales are not a new issue and took place before the previous Policy Statement review in 2017/18 however the COVID-19 pandemic and related restrictions have accelerated the general trend to online shopping. Despite the reopening of physical stores, it is predicted that online sales will remain high as people have become more accustomed to online shopping. Research by Alcohol Change UK found major weaknesses in online age verification and failures in checking age when delivering alcohol to people's homes. Test purchases undertaken with this Research found that in nearly three-quarters (72%) of cases where alcohol was ordered for delivery within two hours, it was subsequently handed over to the 18- and 19-year-old participants without seeking proof of age, in direct contravention of retailer's own published policies.

The types of businesses that sell alcohol online now range from small independent traders, specialist drinks retailers/clubs, local convenience stores, and supermarkets through to multinational e-commerce companies (e.g., Amazon). There is also a growing variety of app-based retailers who have arrangements with restaurants, takeaways and off-licences to deliver alcohol directly to people's homes and the HSCP would like the Licensing Board to consider the following conditions for alcohol delivery to be included in the new Licensing Policy:

As such Renfrewshire HSCP are supportive of amending the board's current conditions around alcohol delivery as follows:

**Condition 1** in relation to alcohol deliveries be extended to state: (i) that drivers employed at licensed premises should be trained in relation to the Challenge 25 age verification process to the same level as staff who require to be trained to sell alcohol on the premises, and required to undertake this process when delivering alcohol; and (ii) that, if a third party provides the delivery service, it is the premises licence holder's responsibility to ensure that the third party follows the Challenge 25 age verification process when delivering items including alcohol.

**Condition 4** in relation to alcohol deliveries should be extended to state that alcohol must also not be left with any person who is visibly intoxicated.

By making these changes Renfrewshire HSCP believe this would strengthen the board's policy around the licensing objectives of protecting children and young persons from harm and preventing public nuisance.

Clerk to the Licensing Board  
Renfrewshire Council  
Licensing Section  
Renfrewshire House  
Cotton Street  
Paisley  
PA1 1TT

Dear Sir / Madam

### **Statement of Licensing Policy**

I write in response to the current consultation being undertaken by the Renfrewshire Licensing Board regarding the draft Statement of Licensing Policy 2023-2027 and request for responses.

I will particularly focus on the proposed policy for Over-provision of Licensed Premises as it is proposed to affect Paisley Town Centre.

As the senior Renfrewshire Council officer responsible for town centres and regeneration aligned to these, I am as attuned as many to the challenges that town centres have faced in recent years as purchasing patterns have altered and more goods and services are now purchased via the internet. This level of previous retail floorspace demand is unlikely to ever reappear in traditional town centres.

These challenges (together with structural changes occurring within the retail and banking sectors where fewer overall number of sales outlets are now required by individual companies trying to gain national coverage) have led to a “contraction” of town centre space demand.

The Council’s agreed Paisley Vision 2030 [[A Vision for Paisley town centre 2030 - Renfrewshire Website](#)] sets out potential responses to these challenges as many of the traditional town centre sectors contract in space requirements. Two elements of this repurposing are particularly relevant to this consultation.

Firstly, there will be a significant growth in the number of people living in and around Paisley Town Centre in future years. These new residents will be seeking services and amenities close by.

Secondly, there will be a need to find new uses for the buildings and spaces left behind by shops and banks and others who leave their Paisley premises. One of the obvious investment choices for that property owner will be hospitality, which may include requests for licensed premises.

My proposition to the Licensing Board is that the continuation of the current policy in Paisley will not assist with this regeneration and repurposing process, and indeed will counteract its likelihood of success.

Looking again at the boundary and the list of licensed premises in July 2023, it would appear as if the extent of the proposed boundary is less relevant to the current context.

The concentration of pubs / licensed premises within the proposed boundary is clearly at **New Street** and **Shuttle Street**. There are no pubs / licensed premises (beyond cafes) within any of the following locations which are also with the proposed boundary:

- *High Street* (pedestrianised section – New St to St Mirren Brae)
- *St Mirren Brae / Causeyside St* (west frontage – High St to New St)
- *Paisley Shopping Centre*

By my estimation if a revised boundary was proposed (focused on New Street and Shuttle Street) and it excluded the 3 bulleted locations above; this would leave two premises from the proposed boundary (two pubs on east side of Causeyside Street) that would have to be included / excluded, depending on the Board's view on how significant an issue they raise. However, neither could be argued to be within a significant concentration of licensed premises at present.

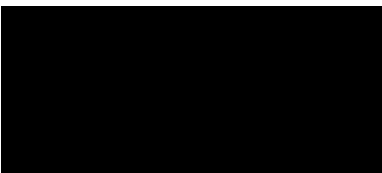
In short, my view is that the currently proposed boundary is that its full extent is not necessary (as there is no concentration of licensed premises to avoid worsening) and furthermore, by applying the restriction it is very likely to reduce the likelihood of reinvestment as properties become vacant.

My ask of the Licensing Board is to **amend the proposed boundary to focus on the New Street / Shuttle Street locations** where most of the public houses and other licensed premises in the town centre are concentrated in any case.

I would further suggest that, if the Board are agreeable to removing the areas listed above from the proposed boundary, that this decision be reviewed again after 5 years to assess what impact if any reinvestment proposals have had in that period following this change to the boundary.

Please contact me for any further information regarding the above representation at your convenience.

Yours sincerely



**Alasdair Morrison**

**Head of Economy and Development  
Renfrewshire Council**

## **Renfrewshire Licensing Board Statement of Licensing Policy 2023-2027 Consultation Response Scottish Grocer's Federation**

The Scottish Grocers' Federation (SGF) is the trade association for the Scottish Convenience Store Sector. There are 5,098 convenience stores in Scotland, which includes all the major symbol groups, co-op and convenience multiples in Scotland. SGF promotes responsible community retailing and works with key stakeholders to encourage a greater understanding of the contribution convenience retailers make to Scotland's communities. In total, convenience stores provide over 49,000 jobs in Scotland.

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 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.

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.

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 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.

### **Introduction**

SGF welcomes the opportunity to contribute to the consultation exercise on the Statement of Licencing Policy 2023-2027 from Renfrewshire Licensing Board. We trust that you will find our comments helpful. Our comments relate primarily to Management of Premises, Licensed Hours, and Overprovision.

### **Management of Premises**



### *Proof of Age*

SGF promote responsible community retailing and recognise the importance of selling alcohol in a responsible way.

This happens through the following key areas:

- 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

### *CCTV*

SGF does not fully agree with the statement set out in section 20.4 on CCTV. We do not believe that it should be a requirement for all staff to be trained in the use of CCTV (or for a CCTV trained member of staff to always be present during licensed trading hours). SGF would see such a condition as an additional burden on convenience sector retailers who often have to operate with the minimum amount of staff due to cumulated cost pressures. On top of this, retailers are having to do more hours themselves with 11% of shop owners in Scotland working more than 70 hours a week. It is already the case that all off-sales premises must have a compliant CCTV system in place.

### *Delivery of Alcohol and consumption by persons under 18 or drunk persons*

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.

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. We accept the local conditions for premises offering alcohol deliveries shown in Appendix III.

Drivers are trained to -

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 door step.

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.

SGF promotes responsible retailing, including the sale of alcohol and any of the other 222 products restricted under legislation.

## Licensed Hours

### *Off-Sales*

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.

SGF therefore supports section 15.2 that generally permits off sales hours from 10am until 10pm. Retailers are used to the current licensed hours and so SGF would not want to 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.

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.

## Overprovision

We 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.

We gather from section 16 that, while Paisley Town Centre overprovided in respect of "Liquor or Pub Type Premises", convenience stores do not come under these requirements on overprovision. We believe convenience stores should always be excluded from policies on overprovision.

We respectfully suggest that overprovision is a blunt instrument and does little to reduce alcohol related harm. If the licensing board decided to develop an overprovision policy, SGF would strongly urge that this is based on a locality as opposed to whole area approach.

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.

Creating localities of overprovision also risks damaging business opportunities for retailers as they cannot open new off-licences in these localities. 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.

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. Our members are responsible retailers and they put considerable effort into ensuring that alcohol is sold in a responsible way.

### **Conclusion**

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. While we welcome this consultation exercise the SGF believe the licensing system should not be onerous on retailers. We hope that you find these comments helpful.

## Aileen Easdon

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**From:** J Cc <jcommunitycouncil@gmail.com>  
**Sent:** 28 June 2023 19:22  
**To:** Democratic Services; licencing.cs@renfrewshire.gov.uk  
**Cc:** Douglas Campbell  
**Subject:** Re: Formal Consultation on Renfrewshire Licensing Board's Statement of Licensing Policy

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Hi

Having consulted the members of the Johnstone Community Council, we have the following comments.

We believe that we have an over provision of licensed premises in Johnstone especially in the town centre.

Currently there are 4 Supermarkets, 1 Convenience Store, 9 Public Houses, 1 Bowling Club, 2 restaurants and 1 Off Licence.

Although we think that the current licences should remain in place, unless of course they breach their conditions however, we would object to any further licences being issued and that Johnstone Community Council should have a say in any licensing decisions as a matter of course.

We have also had many problems with youngsters drinking and causing havoc in the town centre and surrounding areas. So any further licences being issued would only add to these problems.

Regards  
Geraldine M McNealey  
Chairperson of Johnstone Community Council

Sent from my iPad

On 26 May 2023, at 14:02, Democratic Services <democratic-services@renfrewshire.gov.uk> wrote:

### **FAO Local Partnership Members**

Renfrewshire Licensing Board carried out an initial, informal consultation in relation to the review of its liquor licensing policy statement between December 2022 and February 2023.

At a meeting of the Licensing Board on Thursday 27<sup>th</sup> April 2023, the Board considered the responses received to that initial, informal consultation, which have now been published on the Licensing Board's web page, and approved the terms of a draft revised policy statement and a draft consultation paper. The consultation paper asks for views on particular issues raised in response to the initial consultation, as well as seeking views more generally on the terms of the draft licensing policy statement prepared for the purpose of further consultation.

The draft revised Statement of Licensing Policy and the consultation paper referred to above can be accessed on the Licensing Board's website at: <https://www.renfrewshire.gov.uk/article/3207/Statement-of-Licensing-Policy-Alcohol-Licensing>

The Board decided, at its meeting on 27<sup>th</sup> April 2023, which localities it would wish to formally consult upon for the purpose of assessing whether there is overprovision of licensed premises in Renfrewshire. The Board identified one area, in Paisley Town Centre, in respect of which it would welcome views for this purpose.

A plan for this locality, with statistical information in relation to numbers, capacities and licensed hours within that area can be accessed via the following link:

<https://www.renfrewshire.gov.uk/article/3207/Statement-of-Licensing-Policy-Alcohol-Licensing> The Board will require to decide whether this area is overprovided in respect of all licensed premises or premises of a particular type. The Board's existing policy declares this area overprovided but only in respect of liquor or pub type premises (excluding hotels, restaurants and nightclubs). Consultees should state, if they consider the area overprovided, whether they think it is overprovided in respect of all, or certain types (if so, which) of premises.

The Board would welcome comments from those who wish to respond in relation to the various issues set out in the detailed Issues Paper. However, consultees may wish to comment on other matters contained in, or which they believe should be covered by, the policy statement.

Consultees should note that the Statement of Licensing Policy should seek to promote the licensing objectives set out in the Licensing (Scotland) Act 2005. These are: preventing crime and disorder; securing public safety; preventing public nuisance; protecting and improving public health; and protecting children and young persons from harm.

Responses to the formal consultation are required by **Friday 21<sup>st</sup> July 2023**.

The Licensing Board is likely to decide to publish responses received to the formal consultation in due course.

Should you wish to respond to this consultation you may send your response to us at: [licensing.cs@renfrewshire.gov.uk](mailto:licensing.cs@renfrewshire.gov.uk)

or to

The Clerk to the Licensing Board,  
Renfrewshire Council,  
Renfrewshire House  
Cotton Street  
Paisley  
PA1 1TT

Many thanks.

Regards,

Douglas Campbell  
Assistant Managing Solicitor (Licensing)/ Depute Clerk to the Licensing Board  
Legal and Democratic Services  
Renfrewshire Council  
Renfrewshire House  
Cotton Street  
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0141-487-1096

Renfrewshire Council Website -<http://www.renfrewshire.gov.uk>

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## Aileen Easdon

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**Subject:** FW: Mrs Rai  
**Expires:** 24 December 2023 00:00

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**From:** kuldip rai [REDACTED]  
**Sent:** 12 May 2023 12:10  
**To:** licensing.cs (CSAlias10) <[licensing.cs@renfrewshire.gov.uk](mailto:licensing.cs@renfrewshire.gov.uk)>  
**Subject:** Mrs Rai

Hi, we received a letter from yourselves about the overprovision of licensed premises in Renfrewshire x. I would like to say that firstly premises that already have liquor licence are dependent on the sales of this. Taking away a licence will have a big impact on their livelihood x. The council should have thought about this before the licence was permitted x. Also I do believe that if anyone wants to buy alcohol will do so whether there is one store or five x yes there are a lot of pubs and licence outlets but so are hairdressers and takeaways x. Thank you

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