

## General Consultation Comments

### **Question One - Do you agree that a late night levy be introduced in the City of London?**

Placing additional financial pressure on social and leisure businesses may discourage such businesses to the detriment of City Corporation objectives (6).

Well run establishments should not be penalised, only those that have and do pose a risk (3).

The levy should not become a general tax.

Crime is low in the City. Levy is unwarranted (2).

The crime figures do not support the introduction of a LNL. There is no indication what % of alcohol related crime is attributed directly to licensed premises. The evidence does not relate the crime figures to the supply of alcohol between midnight and 6am. Alcohol related crime is a small proportion of overall crime in the City. City Corporation is already adequately funded. City of London crime figures are low compared to other areas.

It is unfair to seek funds from a class of premises because they trade during a specific period. The fee structure of licensing is currently under review and may lead to double taxation when considered with the LNL

Businesses in City of London already pay high rates. Crime in City of London is low therefore a LNL is not justified. Good practice schemes should be incentivised - they have positive impact in dealing with problems. There is no certainty that monies raised by LNL will be used to address crime and disorder.

There is no basis for introducing a LNL. Crime is low in the City. Late night licences are being granted by City of London despite the perceived problems with the NTE.

LNL will impose significant cost burden on hospitality industry, affecting viability of businesses. Business rates are high and should cover some of the costs the levy seeks to meet. Operators likely to cut back hours so as not to pay levy resulting in uniform terminal hour in the City. LNL makes no distinction between good and bad operators. Voluntary good practice schemes are more cost effective and promote a better buy in from operators

### **Question Two - Do you agree that if a levy was to be introduced it should operate between midnight and 6 a.m.?**

Little happens before mid-night. If period set at a later time it would lessen the burden on many premises

Late as possible to minimise impact on pubs and restaurants. (5)

Problems start after 11p.m. therefore period should start earlier

Allowing drinking until 1am discourages binge drinking before closing time.(2)

There is more risk of drunken disorder due to hardcore drinkers after 2am

Any problems associated with alcohol related crimes in the City can be addressed through BIDS and Safety Thirst.

If a LNL is adopted it should not commence before 3am as this is the time there appears to be a problem with alcohol related offences linked to the NTE

More detailed examination of crime figures is required to justify the introduction of a LNL

### **Question Three - Do you agree that there should be no exemptions from paying the levy?**

All should be treated the same except for New Year's Eve (NYE)

All premises should contribute (2)

If LNL is adopted it would be unfair to have any exemptions

Responsible suppliers of alcohol should not be penalised

Livery halls should be exempt as they do not add to the problems associated with Night Time Economy.(5)

Bingo halls should not be exempt. Everyplace where the public attends should pay the Levy

Must be a level playing field except for BIDS and NYE

Overnight accommodation, theatres, cinemas and community premises operate in a manner where it is normal to have customers consuming alcohol after midnight. Not the sort of place where trouble would be anticipated and should be exempt. NYE should also be exempt.(2)

Restaurants should be exempt. Only clubs operating after 3am should pay.

Restaurants should be exempt. Diners generally do not cause disturbance. Sports people tend not to get drunk, neither do people who go to the cinema, theatre or community premises. People traditionally get drunk on New Year's Eve into the early hours. A levy for this would be profiteering.

Drunk people in a hotel do not cause disturbance on the streets. NYE celebrations should be free of obstacles

Overnight accommodation premises do not contribute significantly to the detrimental effects of the NTE. Hotels should be exempted where they only serve alcohol to people staying overnight at the premises as they are not likely to leave the hotel and be a burden to policing the NTE. NYE should be treated as a special occasion. It is reasonable to exempt premises contributing to a BID.

Overnight accommodation premises should not have to pay if they only provide alcohol to those staying there. Theatre, cinema and Bingo Halls should not pay as they are unlikely to contribute to alcohol related crime and disorder. NYE is a national event that in the past has been deregulated and should be exempted.

Overnight accommodation should be exempt where supply is only to those staying there. NYE is a one off occasion and should be exempted. Knock on effect would be for premises to vary hours to remove NYE and then apply for TENs - an increased workload for the licensing authority. Premises in BIDs should be exempt as they contribute to the improvement of city centres.

NYE should be exempted as it is a significant public celebration. Premises in BIDs should be exempt as they contribute to the improvement of city centres.

Additional costs on community premises would impact on the inclusiveness of people in the area

### **Question Four - Do you agree that businesses meeting the ‘small business rate relief’ criteria should not receive a reduction?**

Levy should be reduced in proportion to the rate reduction

Opportunity to discount an SBBR should be taken up to limit damage to the economy of small businesses

It will be detrimental to small businesses (if they didn't get the discount) (5)

Small premises attract as much police attention - why should they get a reduce rate (3)

Businesses should be incentivised (by getting a discount)

If LNL is adopted it would be unfair to penalise large businesses. Small businesses can add to NTE problems

Small businesses qualifying for small business rate relief are not likely to sell much alcohol and should be exempted

No evidence to suggest that alcohol supplied on such premises is any less likely to contribute to crime and disorder

### **Question Five - Do you agree that premise meeting the requirements of the Safety Thirst Award Scheme should be entitled to a 30% discount?**

Everyone trading after 1a.m. should pay the Levy, there should be no financial merit for meeting the requirements of reasonable schemes

Everyone should be treated the same

Too complicated (3)

If businesses invest in best practice schemes they should have their Levy reduced.

If a levy is introduced we will consider withdrawing from all good practice schemes. These were designed, and in our opinion ensure, our premises are run in an orderly fashion. The introduction of a levy across the piece ignores this and therefore membership becomes irrelevant.

Puts in danger voluntary partnership working

As important as Safety Thirst is premises should be meeting these standards anyway. Too high a discount.

Should be more support for street cleaning

Root cause of alcohol related disorders and violence is only alcohol. Reducing alcohol supply in this supply period is the only solution

Persons applying for awards are not those employed after 1am. Awards do not translate to real change on the ground.

There should be a reward/incentive for encouraging safe drinking practices (12)

It should be incremental. 15% in the first year and 30% in following years

A scheme must be rigorous, audited and followed up with compliance visits. A 20% reduction is more reasonable

Pubwatch should also be considered for a reduction

### **Question Six - Do you agree that the minimum 70% of the net revenue raised from the levy should go to the Police?**

Not proportionate as Local Authority incur large cleaning bills

Greater percentage to the Local Authority

Should be sufficient amounts for street cleaning (2)

Local Authority should only cover administration - the rest should go to the Police

100% income to police (2)

90% to police as they bear the burden of late night drinking. 10% to City of London

There should be no levy. It will end up funding areas of LA & Police work not associated with NTE

The levy should be used to provide 'added value' to well run businesses, not just to fund existing activities and commitments

Why should the local authority get any more money. They collect business rates

Neither organisation needs more money to police a problem that has not been proven on the face of the consultation document

As there is no binding requirement for Police to spend its share in policing the NTE, the licensing authority should get its maximum possible share. Consideration should be given to the development of a joint programme which would pool the levy proceeds to maximise impact

### **Question Seven - Do you agree with the way in which the City Corporation will spend their portion of the levy?**

Not to be used simply for administration.

Money should be set aside for damage/repair and street cleansing

Money should not fund new positions in Local Authority - should support business led good practice schemes

Spending on administration and enforcement is not likely to sufficient impact or engage operators. A liaison group of operators and authorities should be set up to decide on spending priorities. This will develop collaborative approach to improving the NTE.

Money should go to police (2)

There should be no levy

It is not fair for a small portion of licensed premises to pay for a service that will benefit all licensed premises. The LNL should not be used to create a general enforcement post. Money should go towards street cleansing

Income should be used to fund enforcement of licensing and planning objectives and to increase night time street cleansing

Why should the local authority get any more money. They collect business rates

If a LNL is adopted, money would be better focused on dealing with crime and disorder associated with NTE.

Increased inspections may not have a material impact on alcohol related crimes. There is a concern that LNL proceeds will be used to fund work not linked to the NTE

The amount raised in revenue for the licensing authority may not be as much as anticipated and question whether City of London will be able to deliver its programme

### **Question Eight - Do you agree with the way in which the City of London Police will spend their portion of the levy?**

Too much emphasis on administration (2)

There should be no levy

The proposed new action team should work with licensing & planning to enforce licensing and planning objectives of NTE

The evidence indicates no link between licensed premises and alcohol related crime

The Police action team does not appear to be focussed on the NTE. Money should be used to fund extra officers on the street during the levy period

LNL proceeds should be used to provide front line policing of the NTE, not on administration

Police resources should be directed at dealing with irresponsible and criminal individuals and businesses that do not comply. Police must engage businesses.

LNL proceeds should be spent in a manner which benefits all operators who contribute eg, funding of participation in partnership schemes to benefit whole NTE. Good operators should not see their money spent on enforcement action against poor ones

### **Question Nine – General Comments**

Only charge Levy to those causing the problems (4)

Target only problem premises and not every one, particularly not Livery companies (2)

Banks should be exempt

No restriction on spending by the Local Authority - leave it flexible

If premises do not make sufficient profit to pay the Levy they can reduce their hours to bring themselves outside of the Levy period.

Companies benefitting from the late night economy should pay for enhanced policing and protection for residents

## Appendix 3

Income from LNL could be used to fund additional costs of night time parking enforcement.

Businesses still struggling with effects of recession. Rising costs have put businesses out of business; additional costs will be a burden. Closed businesses will raise no revenue for the authority. A blanket levy charge is unfair and does not take into account the real areas of risk

Livery Halls are not known for creating disturbance. They should be exempt (2)

Licensed premises have additional costs associated with provision of security staff & CCTV. No more costs (2)

Premises that have been prosecuted should pay 5x the levy for the first offence and 20x the levy for second offence

All organisations should support improvement to the social environment. The initiative needs to be carefully controlled and must not creep forward before midnight as a means of enhancing revenue

Asking businesses that only operate occasionally beyond midnight to pay the levy would be unfair

There is no requirement for a LNL in City of London. The evidence does not support it. It would be unnecessary, unfair, unprofitable and disproportionate. Results can be achieved by more effective and economic means. Problematic premises can be dealt with by way of review.

There is a concern that monies raised by the LNL will not be used by the Police or Licensing Authority for additional policing related to the NTE. A LNL will force premises into reducing hours to avoid paying the fee. Losing this amenity in City of London will be detrimental. Business rates in City of London are already high. The amount of revenue raised by a LNL could be less than expected. There is a review process under the Licensing Act 2003 to deal with problem premises. Should the introduction of a LNL be postponed until the Licensing Act 2003 fees review is complete?

The LNL is a significant tax to be imposed on premises already struggling financially. Crime is low in City of London. Many premises will vary hours to fall outside of LNL period.

*\*n.b. Figures in brackets represent the number of similar comments made*