

Northamptonshire County Council Specialist Public Health Team response to Northampton Borough Council consultation on Draft Statement of Licensing Policy 2016 – 2021.

23rd December 2015.

Context:

The sale and consumption of alcohol has a major impact on the health and wider wellbeing of communities. While those impacts can be positive, for example in relation to creating jobs and enabling social and community interaction, there can also be significant negative impacts on health and wellbeing due to alcohol consumption. For this reason, Public Health England has identified 'Reducing harmful drinking' as one of its priorities. Information about the impacts of alcohol in Northampton Borough is available from a variety of sources including www.lape.org.uk or by contacting NCC's Public Health / Business Intelligence and Performance Improvement team. A brief summary of information about alcohol harms in Northampton is attached as appendix 1.

Comments:

Chapter 3

Chapter 3 of the draft Statement of Licensing Policy describes the Borough of Northampton and its people. However there is no reference to the health of the population of the Borough, nor specifically the impact of alcohol on the health and wellbeing of its population.

This chapter describes Northampton Borough Council's aspirations in relation to economic growth and prosperity as well as its activities to enhance cultural and heritage opportunities but makes no reference to any ambitions to improve the health and wider wellbeing of its communities. This is despite the fact that 'Promoting Health and Wellbeing' is identified as one of NBC's eight priorities in the 'Northampton Borough Council – Corporate Plan Update 2015. <http://www.northampton.gov.uk/CorporatePlan> In addition the chapter does not recognise the negative economic impact that alcohol can have due for example to costs incurred by health and policing services as well as through lost productivity.

Chapter 5

Chapter 5 is entitled 'Strategies' and is presumably intended to identify local strategies that are relevant to the sale / provision of alcohol.

However there is no reference to the **Northamptonshire Health and Wellbeing Strategy**. The current Northamptonshire Health and Wellbeing Strategy makes explicit reference to the significant impacts of alcohol use in the county and includes a strategic priority of '**tackling alcohol and drugs issues to protect communities and improve lives**'

Chapter 5 also doesn't mention the **Northamptonshire Alcohol Harm Reduction Strategy**. This strategy considers a wide range of issues relating to alcohol and the impact it has on communities in the county, including Northampton Borough. Nor does chapter 5 make reference to the Northamptonshire Police and Crime Plan, which again addresses the significant impact of alcohol on crime in the county.

These strategies and the evidence base that supports them are an important part of the context in which the Borough Council's Statement of Licensing Policy will operate. They therefore should be identified and the policy should be implemented in a way that contributes to their achievement.

Health and Wellbeing in Statements of Licensing Policy

There are a number of examples of Statements of Licensing Policy which include significant reference to health and wellbeing. For example, Warrington and Middlesbrough.

While it is recognised that public health is not one of the 4 licensing objectives within the licensing legislation, NCC's Public Health team feels that the Statement of Licensing Policy could much better identify and reflect the health and wellbeing aspects of alcohol consumption and the alcohol licensing process.

This would act as a sound basis for NBC as the licensing authority to work together with the Director of Public Health and his team to ensure that the licensing regime effectively supports the achievement of shared health and wellbeing objectives in Northampton Borough (within the framework provided by the licensing act 2003).

Chapter 7

While it is acknowledged that relevant licensing guidance states that the 'public safety' licensing objective relates to the physical safety of the people using the licensed premises, it is felt that the wording of paragraph 7.2.1 gives the strong impression that public health is not at all relevant to the SOLP and licensing practice. We would therefore request that this is re-worded.

Chapter 9

Paragraph 9.1 states:

9.1 Northamptonshire County Council Directors of Public Health (DPH) are now responsible authorities with all of the powers and responsibilities this brings.

There is in fact only one Director of Public Health.

Chapter 10

In section 10 - The Responsible Authorities, the Director of Public health should be identified as:

Director of Public Health
Northamptonshire County Council
County Hall
Guildhall Road
Northampton
NN1 1ED

General

The SOLP does not identify any baseline evidence / data in relation to the four licensing objectives in Northampton Borough – e.g. crime levels, data relating to harm to children etc. It is therefore not possible to determine from the SOLP what the current position is in Northampton Borough in relation to the four licensing objectives and thus the scale / nature of the issues that the licensing process needs to contribute to. While it is acknowledged that this data will change over time, it would help provide context to the proposed SOLP to identify the current data.