



Northamptonshire County Council

Director of Public Health
Northamptonshire County Council

Dear Sir / Madam,

Ref – licence application in relation to 10 Wellington Place, Barrack Road, Northampton, NN1 3RQ.

As a Responsible Authority under the 2003 Licensing Act, the Director of Public Health makes the following representations in relation to the above licence application.

These representations relate to the following licensing objectives:

- Prevention of crime and disorder
- Public Safety
- The protection of children from harm

Our approach

Northamptonshire County Council has begun screening licensing applications against a series of indicators relating to alcohol harm.

In order to identify geographical areas in the county which experience significant alcohol harm, the Public Health team has identified a number of indicators of alcohol harm and incorporated them into a tool which enables us to compare small geographical areas (Lower Layer Super Output Areas – LSOAs) with other geographical areas with a similar sized population across the county and rank them accordingly. The County is made up of 422 such LSOAs while Northampton Borough is made up of 133 LSOAs.

The indicators used include data in relation to:

- Alcohol liaison nurse service data
- Presentations to Accident & Emergency (A&E) departments with a recorded link to alcohol
- Violent crimes involving alcohol or with an identified link to a licensed premises
- Children's social care data with alcohol misuse identified in relation to an adult in the household
- Alcohol / substance misuse treatment client data, where alcohol misuse is identified
- Extent of existing licensed premises in the location of the area

(More information about the data used is included in the attached appendix)

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Northamptonshire
County Council

Alcohol harm – LSOA Northampton 021C (E01027153)

The premises to which this licence application relates is contained within the LSOA referred to as Northampton 021C (E01027153)

Based on our rankings of alcohol harm, this LSOA is ranked **number 1 of 133 LSOAs in Northampton Borough** and **number 1 of 422 LSOAs in the county** (where 1 indicates the highest levels of alcohol harm).

Specifically:

The number of patients seen by the Alcohol Liaison Nurse during an admission to Northampton General Hospital or Kettering General Hospital (rate per 1000 people) **is the highest of any LSOA in Northampton Borough** (for both single admissions and multiple admissions) **and the 2nd highest in the county for single admissions** and **9th highest in the county for multiple admissions**.

The number of presentations to Accident & Emergency departments (rate per 1000 people) following an assault involving alcohol or where the patient has cited a licensed premises as the location is the **4th highest of any LSOA in Northampton Borough** and **5th highest of any LSOA in the county**.

The number of clients (rate per 1,000 people) receiving treatment within public health commissioned treatment services and with alcohol as the primary problem substance is the **highest of any LSOA in Northampton Borough** and also **the highest of any LSOA in the county**.

The number of existing premises with alcohol licenses (per 1,000 people) in the LSOA falls within the top 10% of all LSOAs in the county. When considering the number of licensed premises within a wider 1km radius of the postcode of the proposed premise, the numbers are very high: - **208** premises licensed to sell alcohol, of which **60** are off licenses.

Further details on these figures are contained in appendix 1.

Alcohol availability and alcohol harm:

There is extensive research which highlights a direct link between the availability of alcohol and alcohol related harm in the surrounding environment, including alcohol related disease and violence (Richardson 2014, NICE 2010, NICE 2014)*

The available research suggests that the density and prevalence of alcohol retail outlets influences alcohol related harm in a variety of ways, including:

- Creating greater physical availability of alcohol in a local area
- Increasing the visibility of alcohol advertising in a local area
- Shaping and reinforcing local attitudes and norms around drinking behaviour and drunkenness.

It is therefore the representation of the Director of Public Health that the licence should **NOT BE GRANTED**, based on the fact that an additional licensed premises is likely to exacerbate the existing high levels of alcohol related harm in this area even further.

Should the licensing authority grant the licence, the Director of Public Health would wish to see the following conditions placed upon the licence:

1. There will be no sales of beers, ciders, or lagers with an alcohol strength higher than 6.5% ABV
2. There will be no window display posters or similar advertising containing any reference to alcohol on the premises shop frontage or the highway abutting the premises.
3. The licensee will be required to display at all times, and in close proximity to all alcohol displays within the premises, the Alcohol Guidelines produced by the UK Chief Medical Officers, and any subsequent guidelines that replace them. The nature of the display material should be approved by the Director of Public Health / Public Health team.
4. The premises will implement the Challenge 25 age verification scheme at all times.
5. All alcohol sale refusals will be recorded in a register which will be retained on the premises for inspection by responsible authorities on request.
6. Staff involved in the sale of alcohol will be provided with information / training regarding alcohol harm. This will be provided by Northamptonshire County Council's Public Health team.
7. All alcohol will be displayed in an area of the shop that enables supervision by staff at all times.

*NICE 2010, Alcohol use disorders: prevention www.nice.org.uk/guidance/ph24
NICE 2014, Alcohol-use disorders: preventing harmful drinking. Evidence Update March 2014
Richardson 2014, Alcohol-related illness and death in Scottish neighbourhoods: is there a relationship with the number of alcohol outlets?



Professor Akeem Ali