

Overview

The Northamptonshire Public Health team greatly appreciates the opportunity to comment on the Northamptonshire Statement of Licensing Policy 2019 – 2024.

The aim of public health is to improve quality of life through prevention and treatment of disease. The activities of public health may not always directly relate to the licensing objectives, but can often indirectly impact upon them.

Although we understand that public health is not one of the four objectives, the consumption and sale of alcohol has significant knock on effects to the primary aims of public health. It is for these reasons that we would appreciate a wider acknowledgement of the health implications relating to alcohol, and how licensing is in a prime position to positively improve local health outcomes.

Other Areas

Licensing authorities from other areas have previously used this platform to address the health implications of licensing:

Bolton's statement explicitly recognises the areas above average level of alcohol related health harms.

6.1 Bolton Council recognises that the instances of alcohol-related health harms across the borough are high and that Bolton ranks highly both regionally and nationally in respect of alcohol-related health harms. It also recognises the relationship between alcohol intoxication and violent crime and that violent behaviour is a public health and a crime and disorder issue.

Coventry's policy comments on the detrimental health effects of alcohol, and the way in which alcohol related harm disproportionately impacts lower socio-economic groups.

13.8 In line with the principles of the Marmot Review 'Fair Society, Healthy lives' Coventry City Council has agreed to develop common policies to reduce the scale and impact of health inequalities across the city. This includes focusing interventions such as alcohol reduction on reducing the social gradient in health. There is a social gradient in the harms from alcohol consumption, but not in alcohol consumption itself. Quantities and patterns of drinking differ across socio- economic groups, as do harmful outcomes. According to the Marmot Review, those people from more deprived areas who consume alcohol are more likely to have problematic drinking patterns and dependence than those from more affluent areas. Binge drinking in under 18s is associated with deprivation and unemployment is associated with alcohol consumption

York have dedicated part of their licensing policy to discuss local factors, which includes an overview of alcohol related harm in the city:

5.6 30% of York adults report drinking more than the recommended limits of alcohol, this is in line with the national average. This means that 30% of York adults are putting themselves at an increased risk of alcohol related disease and other long term harm. The excessive use of alcohol is an important public health problem in York, not only because of the health conditions associated with long term alcohol misuse, but also the immediate effects such as accidental injuries, violence and anti-social behaviour.

We appreciate the policy highlighting some of the data the public health team can provide. However, we feel it would be beneficial to provide a brief overview of the kind of data we can offer. It will also give the reader a better understanding of the potential implications of increasing the supply of alcohol:

Indicator	Period	England	East Midlands	Northamptonshire
Percentage of adults drinking over 14 units of alcohol a week	2011-14	25.7	25.5	27.9
Hospital admissions for alcohol related conditions (per 100k people)	2017/18	632	669	702
Hospital admissions for alcohol specific conditions (per 100k people)	2017/18	570	505	485
Hospital admissions for alcohol specific conditions – under 18's	2015/16 – 2017/18	32.9	29.2	35.3
Alcohol related mortality	2017	46.2	46.6	45.4
Hospital admissions for mental and behavioural disorders due to use of alcohol	2017/18	69.2	78.1	74.9
Hospital admissions for intentional self-poisoning by and exposure to alcohol	2017/18	46.2	49.9	66.7
Hospital admissions for alcohol related unintentional injuries (per 100k people)	2017/18	144.3	141.9	151.5

Chapter 8 Health as a responsible authority

We would recommend expanding this section to explain why Public Health is a responsible authority, and how licensing can be used to tackle alcohol related health matters. It may also be worth noting that although the protection of public health is not a specific licensing objective, it can where appropriate permeate each of the licensing objectives.

Annex 3 Other policies, legislation, and guidance sources

This section of the statement highlights a variety of strategies, policies, and legislation that complement the licensing policy.

Although many have been included, we note the absence of the following:

Northamptonshire Health and Wellbeing Strategy 2016 - 2020

The priorities of which are as follows:

- Every child gets the best start
- Taking responsibility and making informed choices
- Promoting independence and quality of life for older adults
- Creating an environment for all people to flourish

As several of these priorities are relevant to the licensing objectives, we would greatly appreciate this important strategy being included within the list of relevant documents.

Director of Public Health Northamptonshire Annual Report 2018/19

Each year the Director of Public Health publishes their annual report. This report details local public health priorities and makes recommendations for future work.

The 2018/19 report comments on the recent increase of alcohol related hospital admissions, and the impact alcohol has on the finances of those living in areas of deprivation. The former is most certainly relevant to the licensing objectives, and the DPH explicitly notes the importance of the licensing regime in our attempts to reduce alcohol related harm.

For these reasons we believe the DPH's annual report should be included in the list of strategies/documents.

Conclusion

As we have noted throughout, we are well aware that public health itself is not one of the four licensing objectives. However, given the harm caused by alcohol in Northamptonshire, we would like to see health related matters be discussed in greater depth.

Kind regards,

A handwritten signature in blue ink, appearing to read 'R. Holley', is written over a faint, light blue rectangular stamp or watermark.

Richard Holley
Public Health Officer
Northamptonshire County Council