



NHS North of Tyne

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Kerry Smith

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Dear Kerry Smith

I wish to OBJECT to the granting of a variation to this licence as I do not believe the change will promote the licensing objectives to prevent crime and disorder and protect children from harm.

The variation would allow the shop to change from having a small display behind the counter to the whole shop selling alcohol and increasing the number of hours per week by 15. This increases the availability of alcohol in this area.

Benwell and Scotswood Ward is one of the areas that recently received funding to tackle alcohol related crime and disorder by Baroness Newlove from the Department of Communities and Local Government. When making this application partners made an assessment based on data relating to alcohol related anti social behaviour, crime and violence against the person along with information relating to alcohol consumption to identify hot spot areas. Also these areas had evidence of local people raising concerns about things such as drunk and rowdy behaviour or there being too many off-licences selling alcohol in their area.

Harm to Children and Young People

We have recently started using data from Newcastle upon Tyne Hospital NHS Foundation Trust of alcohol related assaults attending the Emergency Department in accordance with The College of Emergency Care best practice. This information helps us identify alcohol related assaults and we have found that as many as a third of these incidents are not reported to the Police. According to the most recent data, outside of the City Centre (which would naturally experience the majority of alcohol related assaults as part of the night time economy) the Benwell and Scotswood ward is ranked 4th highest for alcohol related assaults attending A&E. More concerning is the fact that over half of these assaults were not reported to the police and over half of the victims were under the age of 18. These incidents were reported as occurring in a public place rather than being linked to a pub or club.

Newcastle is ranked 237th out of 326 local authority areas (1st is the best) for people under the age of 18 who are admitted to hospital for alcohol specific conditions. When reviewing the data for Newcastle over a four year period from 2008 to 2012, the Benwell and Scotswood ward had the highest number of under 18's with alcohol specific hospital admissions in the City (18, or 12% of the total for Newcastle; Table 1).

Table 1 Hospital episodes for under 18-year-olds with admitted with an alcohol-specific diagnostic code during the period 2008 to 2012 by electoral ward

Ward Name	TOTAL
Benwell and Scotswood	18
Kenton	12
Denton	10
Castle	10
Woolsington	10
Westgate	9
Byker	8
Walkergate	7
South Heaton	7
Lemington	7
Fawdon	6
Walker	6
Other Wards with numbers under 6	35
TOTAL	145

A study last year¹ looking at the relationship between off-licence density and under 18s alcohol specific hospital admissions in England found that there was a moderate but statistically significant relationship between the numbers of off-licensed premises and underage alcohol specific admissions to hospital.

Impact of the availability of alcohol

I also have concerns about alcohol consumption and the behaviour of adults and how this impacts on children. Regional and local surveys in Newcastle indicate that the majority of alcohol is now consumed in the home or other domestic environment and is purchased from the off-trade.

There is good evidence that the factors which increase alcohol consumption are: low cost alcohol, the proximity and density of premises selling alcohol, and the length of opening times. Together, these factors render alcohol more affordable, more available and therefore easier to consume. Research also shows that children are impacted by the drinking behaviour of their parents and other adults in their community, this can cause both immediate and long terms harms such as being exposed to domestic violence (of which at least 50% are related to alcohol), neglect and child abuse. According to the Safe Newcastle Strategic Assessment, Benwell is one of the areas identified as having higher levels of domestic violence and this is along with parental substance misuse are the leading causes for the Council having to take action to protect children from harm. We know that the drinking behaviour of parents and adults impacts on the future drinking habits of a young person, which can go on to affect their future health and life opportunities.

When looking around the area of the premise, there are already 7 various types of premises selling alcohol, ranging from smaller supermarkets to dedicated off-licences selling alcohol. Where there are high numbers of outlets bunched together in a small geographical area as there is in this area, there is greater likelihood of the discounting of alcohol products as a means of outlets competing with each other. Allowing this variation would only increase the availability of alcohol in this area further.

For young people under-18, greater off-licence density does not necessarily translate into increased opportunity for the direct purchase of alcohol. Rather, greater off-licence density increases the general availability of alcohol in the home and through friends, family and from passers-by – through what is known as ‘proxy purchasers’ outside alcohol retail outlets. As off-licences in the area have failed test purchases and proxy sales operations, this would indicate that the area has an issue of young people trying to obtain alcohol themselves or from adults on their behalf.

Yours sincerely

Dr Fu-Meng Khaw

Director of Public Health Newcastle Primary Care Trust and Newcastle City Council



Copy to: Linda Appleby – Licensing Officer, The Licensing Authority, Newcastle City Council

