



Our Ref. LLF2011/03  
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16 April 2013

Councillor Marie Boulton  
Convener of the Aberdeen City Licensing Board  
Aberdeen City Council  
Town House  
Aberdeen

Dear Councillor Boulton

## **RECOMMENDATIONS FROM THE ABERDEEN CITY LICENSING FORUM TO THE ABERDEEN CITY LICENSING BOARD**

As you are aware, during 2012, the Aberdeen City Licensing Forum formed a sub-group with its remit being to provide recommendations to the Aberdeen City Licensing Board in relation to matters that it should consider in formulating its new Statement of Licensing Policy (SLP), due for publication in November 2013. I was appointed as Chair of this sub-group and have convened meetings on a monthly basis between December 2012 and March 2013 in order to consider this issue.

On behalf of the Aberdeen City Licensing Forum, the sub-group now makes eight specific recommendations (shown on pages 3&4). In making these recommendations, it is worthwhile recalling that in previous correspondence and discussion with the Licensing Board, there was already agreement reached that:

- The Licensing Board endorsed the local Aberdeen City Alcohol & Drugs Partnership (ADP) Alcohol Strategy.

The strategy has a number of strategic outcomes, which are underpinned by the three key objectives: A Safer, Healthier & more Responsible attitude to alcohol in Aberdeen and specifically;  
The 'Responsible' section, contains outcomes 3 & 4 - *'promote and support improvements in relation to upholding the five licensing objectives'* and *'implement and monitor measures relating to overprovision in city centre and community environments'*.

- The Licensing Board endorsed the work done by the Licensing Forum / ADP through the Aberdeen City Voice questionnaire (carried out in 2012) around off-sales of alcohol, and agreed that this would help inform the development of the SLP.

This survey showed that 579 of the respondents (86.6%) considered that in their opinion the amount of places to buy alcohol in their local area was either 'about right' or there were 'too many'. Only a very small minority (10 - equating to 1.5%) of the respondents said that there was 'too few'.

There is also merit in re-iterating evidence which supports that alcohol is having a huge impact, not only across Scotland, but also within Aberdeen City.

***The Cost of Alcohol in Aberdeen City – Alcohol Focus Scotland (AFS)***  
*AFS produced a fact sheet in 2012, which estimated the cost of alcohol in Aberdeen City.*

<b>Health Service</b>	<b>£10.11m</b>
<b>Social Care</b>	<b>£12.19m</b>
<b>Crime</b>	<b>£53.66m</b>
<b>Productive Capacity</b>	<b>£44.96m</b>
<b>TOTAL</b>	<b>£120.92m</b>

*This report estimates the overall cost per head of population, including wider social costs as equating to £788 per year.*

In 2008 the three Grampian ADPs, carried out an on-line survey regarding drinking attitudes, in support of the Scottish Government's Alcohol Awareness Week. The responses from the Aberdeen residents (816) who completed it showed that:

- 37% had reported experience of minor injuries related to their personal alcohol consumption
- 13% acknowledged alcohol had been 'detrimental' to their personal health

During August 2010 an NHS Grampian Acute Sector Alcohol Audit report stated that 47% of the 45 hospital wards at Aberdeen Royal Infirmary / Woodend hospitals included within the survey had contained patients admitted with pre-defined alcohol-related conditions (age range 19-76 yrs), and that the length of the hospital stay for this cohort ranged between 15 to 140 days.

In addition there is a significant body of research published since 2000 which has found associations between the total number of licensed premises and opening hours in a locality, and levels of alcohol harm. This shows that greater access to alcohol is related to a range of health and other problems, including: violence, alcohol-related traffic accidents, hospital admissions, mortality, self-reported injuries and suicide, sexually-transmitted disease and child abuse or neglect.<sup>1</sup> Increased access to alcohol through reduced pricing and increased availability (e.g. number of premises, opening hours), can also lead to increased consumption and increased harm.

Furthermore recent research by academics at Glasgow University found that people living in an area with six alcohol outlets or more can expect crime rates twice as high as those in an area with only three. As a result the researchers suggested that there needs to be limits set on the number of shops selling alcohol in order to cut crime rates.<sup>2</sup>

Decisions on controlling the number and location of licenses granted across Aberdeen city is something that the Licensing Board therefore urgently needs to consider when drafting its SLP. In lieu of this, **the Licensing Forum would strongly suggest that Aberdeen City is currently overprovided in relation to both on-sales and off-sales licensed premises** and that this should be clearly reflected in the overprovision section within the SLP. An over-provision statement which identifies only specific areas to be over-provided falls short of what is required as alcohol problems cut across all sectors of society and are spread across the city.

Taking all of this into consideration, the Aberdeen City Licensing Forum now makes the following recommendations to the Aberdeen Licensing Board.

## **RECOMMENDATIONS**

1. The SLP should contain an overview of the current local baseline position in relation to the 5 Licensing Objectives, as well as demonstrating the linkage of this to the local ADP alcohol strategy and Community Planning Single Outcome Agreement. This overview should capture Aberdeen city as a totality and not merely focus around the impact of alcohol issues within the city centre alone.
2. The SLP should contain details of all the data and other relevant information it has considered in formulating the policy.
3. The SLP should build a timeous reporting framework which demonstrates how the implementation of the policy will progress and promote the 5 licensing objectives.
4. The SLP should outline how the Licensing Board intends, on an ongoing basis to gather, monitor and assess national and local data so

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<sup>1</sup> Alcohol Focus Scotland, Factsheet 1, [accessed 2/4/2013 <http://www.alcohol-focus-scotland.org.uk/licensing-toolkit>]

<sup>2</sup> Catherine Chiang Review of the Relationship between Outlet Density and Crime in NHS Greater Glasgow. February 2010, updated June 2010

- that it can measure ongoing local performance of its policy against the 5 licensing objectives.
5. The SLP should state how often the Licensing Board will review its performance against delivery of its SLP and the 5 licensing objectives. This should be done, on a minimum, on a six monthly basis.
  6. The SLP should explain how the Licensing Board intends to enforce the policy.
  7. In relation to data used by the Licensing Board for baselines, and ongoing performance monitoring, the SLP should clearly show linkages between the implementation of the policy, the 5 licensing objectives and the local ADP alcohol strategy. An example of a possible template for this purpose, with some potential data sources is shown at *Appendix A* (attached).
  8. Within the context of increased access leading to increased consumption leading to increased harm, the SLP should state that Aberdeen City is now overprovided in relation to both on-sales and off-sales licensed premises and this should be clearly reflected in the overprovision section within the SLP. Any further licensing applications would therefore have to provide justification for any additional licensed premise, which, if accorded, would be done so as an exception.

In relation to *Appendix A*, it should be noted that NHS Grampian is currently doing further analysis of data in order to provide useful information and intelligence to assist all five Licensing Boards with which it works across Grampian. This work will be finalised later in the year.

The completion of this piece of work by NHS Grampian will miss the deadline for informing the Aberdeen City Licensing Board's draft SLP, but it is planned that it will form part of the response to the draft SLP consultation process.

The Aberdeen City Licensing Forum would now want these recommendations and the attached appendix to be considered by the Licensing Board when it comes to discuss and agree upon a draft version of the SLP. The Aberdeen City Licensing Forum would thereafter look forward to receiving an update from the Licensing Board as soon as possible on the outcome of these discussions.

Yours sincerely

Garry Burnett  
Head of Aberdeen City Scottish Fire & Rescue Service, and  
Chair of the Aberdeen City Licensing Forum sub-group

cc Eric Anderson, Depute Clerk to the Licensing Board

**Appendix A  
NATIONAL LICENSING OBJECTIVES /  
ADP ALCOHOL STRATEGIC THEMES**

<b>ADP STRATEGY ►</b>	<b>SAFER</b>	<b>HEALTHIER</b>	<b>RESPONSIBLE</b>
	<b>A</b>	<b>B</b>	<b>C</b>
<b>LICENSING OBJECTIVES ▼</b>			
<b>1. Preventing crime &amp; disorder</b>	A1	B1	C1
<b>2. Securing public safety</b>	A2	B2	C2
<b>3. Preventing public nuisance</b>	A3	B3	C3
<b>4. Protecting and improving public health</b>	A4	B4	C4
<b>5. Protecting children from harm</b>	A5	B5	C5

[It should be noted that the data shown in the following pages is not rigidly fixed to a particular area and can often cover more than one section]

BOX	DATA	DATA HOLDER	CURRENT INFORMATION / IDENTIFIED TRENDS	COMMENT
<b>A1</b>	<ul style="list-style-type: none"> <li>Number / Proportion of on-sales premises who employ door stewards</li> </ul>	Licensing Board	This data not currently available to Licensing Forum but should be accessible by the Licensing Board	These types of data provide an indicator to the Licensing Board on how well licensed premises are being operated across the city.
	<ul style="list-style-type: none"> <li>Number of offences under the Licensing (S) Act 2005, sections 102; 111; 114; 115 &amp; 116</li> </ul>	Police	2009/10 – 102 2010/11 – 300 2011/12 – 265	
	<ul style="list-style-type: none"> <li>Number of serious assaults occurring in licensed premises</li> </ul>	Police	2009/10 – 25 2010/11 – 12 2011/12 – 14	
	<ul style="list-style-type: none"> <li>Number of common assaults occurring in licensed premises</li> </ul>	Police	2009/10 – 410 2010/11 – 455 2011/12 – 444	
	<ul style="list-style-type: none"> <li>Pubwatch schemes in operation across Aberdeen city</li> </ul>	Police	2009/10 – 0 2010/11 – 1 2011/12 – 4	
<b>B1</b>	<ul style="list-style-type: none"> <li>Total number and type of alcohol premises in Aberdeen city</li> </ul>	Licensing Board	447 on-sales locations 188 off-sales locations Total - 635	These types of data are very relevant to overprovision in the city.
	<ul style="list-style-type: none"> <li>Numbers of different types of premises in Aberdeen City, e.g. Pubs; clubs; restaurants; supermarkets; local grocer shops; etc</li> </ul>	Licensing Board	This data not currently available to Licensing Forum but should be accessible by the Licensing Board	

<b>C1</b>	<ul style="list-style-type: none"> <li>Data on number and grades achieved of 'best bar none' applicants (as a proportion of all on-sales licensed premises)</li> </ul>	Safer Aberdeen	2012 awards – 11 gold; 10 silver; 4 bronze (total 25) =5.6%	These types of data provide an indicator to the Licensing Board on how well licensed premises are being operated across the city.
	<ul style="list-style-type: none"> <li>Number of premises licence review hearings applied for under Licensing (S) Act 2005, section 36</li> </ul>	Police	2009/10 – 3 2010/11 – 11 2011/12 – 6	
<b>A2</b>	<ul style="list-style-type: none"> <li>Serious violent crime: <ul style="list-style-type: none"> <li>Sobriety status of accused / suspect – numbers marked as 'drunk; had been drinking; drugs'</li> <li>Sobriety status of victim - numbers marked as 'drunk; had been drinking; drugs'</li> </ul> </li> </ul>	Police / Community Safety Partnership	CSP Dec 2012 report: Accused / suspect – 38% Victims – 40%	These types of data provide an indicator to the Licensing Board on the impact of alcohol on violence across the city.
	<ul style="list-style-type: none"> <li>Common assault: <ul style="list-style-type: none"> <li>Sobriety status of accused / suspect – numbers marked as 'drunk; had been drinking; drugs'</li> <li>Sobriety status of victim - numbers marked as 'drunk; had been drinking; drugs'</li> </ul> </li> </ul>	Police / Community Safety Partnership	CSP Dec 2012 report: Accused / suspect – 62% Victims – 36%	
	<ul style="list-style-type: none"> <li>Domestic abuse: <ul style="list-style-type: none"> <li>Repeat victims – numbers marked as 'drunk; had been drinking; drugs'</li> </ul> </li> </ul>	Police / Community Safety	CSP Dec 2012 report: Accused / suspect – 39% Victims – 28%	

	<ul style="list-style-type: none"> <li>○ Repeat offenders – numbers marked as 'drunk; had been drinking; drugs'</li> </ul>	Partnership		
<b>B2</b>	<ul style="list-style-type: none"> <li>• Data from Scottish Ambulance service relating to alcohol</li> </ul>	Scottish Ambulance Service	<p style="text-align: center;">*</p> <p>(The Scottish Ambulance Service previously supplied data to the Licensing Board, when it last reviewed overprovision. This showed that alcohol was having a considerable impact on the services that it delivered)</p>	This type of data provides an indicator to the Licensing Board on the impact that alcohol is having on statutory health services.
<b>C2</b>	<ul style="list-style-type: none"> <li>• Annual drink driving figures for Aberdeen City (contraventions of Road Traffic Act 1988, sections - 4, 5, 6 &amp; 7)</li> </ul>	Police	<p>2009/10 – 385</p> <p>2010/11 – 368</p> <p>2011/12 – 381</p>	These types of data provide an indicator to the Licensing Board on the impact that alcohol is having on statutory services.
	<ul style="list-style-type: none"> <li>• Fire incidents in Aberdeen City attended by Fire Service where it is suspected that alcohol / drugs were a factor</li> </ul>	Fire Service	~	
<b>A3 / B3</b>	<ul style="list-style-type: none"> <li>• Aberdeen city designated place of safety monthly average admissions for people found drunk &amp; incapable</li> </ul>	ADP	<p>2010/11 – 59.6</p> <p>2011/12 – 68.4</p> <p>2012/13 – 56.9 (to Dec 2012)</p>	This type of data provides an indicator to the Licensing Board on the impact that alcohol is having



				on statutory health services.
	<ul style="list-style-type: none"> <li>Exclusion order requests added to police offence reports and numbers granted by courts</li> </ul>	Police	<p>Aug 2009 – July 2010 69 requests (1 granted)</p> <p>Aug 2010 – July 2011 153 requests (4 granted)</p> <p>Aug 2011 – July 2012 364 requests (21 granted)</p>	This type of data provides an indicator to the Licensing Board on the impact that alcohol is having on statutory services.
<b>C3</b>	<ul style="list-style-type: none"> <li>Urinating in public place figures</li> </ul>	Police / Community Safety Partnership	CSP Dec 2012 report: 2011/12 - 462	These types of data provide an indicator to the Licensing Board on the impact that alcohol is having or is perceived to have on the general public.
	<ul style="list-style-type: none"> <li>Alcohol abuse in neighbourhood (Percentage of people spontaneously reporting 'alcohol abuse' as a negative aspect of their neighbourhood)</li> </ul>	National Scottish Household Survey	Awaiting next NSHS data.	
<b>A4</b>	<ul style="list-style-type: none"> <li>Alcohol related attendances at the Accident &amp; Emergency</li> </ul>	NHS Grampian	*	These types of data provide an indicator to the Licensing Board on the impact that alcohol is having on statutory health services.
	<ul style="list-style-type: none"> <li>Numbers of alcohol 'brief interventions' carried out by city GP practices</li> </ul>	NHS Grampian	<p>2009/10 – 1466</p> <p>2010/11 – 3473</p> <p>2011/13 – 3497</p>	

<b>B4</b>	<ul style="list-style-type: none"> <li>Average monthly referral rate to the City Integrated Alcohol Service (IAS)</li> </ul>	NHS Grampian	<p>Since 2011 average monthly rate to IAS has been 80 (in 2011, 70.6% of the referrals came from deprivation areas, coded 4,5 &amp; 6 - i.e. most deprived areas of city). Referrals are however being received by the IAS from all neighbourhoods across the city.</p>	<p>These types of data provide an indicator to the Licensing Board on the impact that alcohol is having on statutory health services.</p>
	<ul style="list-style-type: none"> <li>Alcohol related hospital admissions (rates per 100,000 population)</li> </ul>	Information Services Division, Health Scotland	*	
	<ul style="list-style-type: none"> <li>Alcohol related mortality (rates per 100,000 population)</li> </ul>	Information Services Division, Health Scotland	*	
<b>C4</b>	<ul style="list-style-type: none"> <li>Data from city voice survey in 2012</li> </ul>	ADP / Licensing Forum	<p>86.5% of survey (669) said number of places to buy alcohol in their local area was 'about right' or that there was</p>	<p>This type of data provides an indicator to the Licensing Board</p>

			'too many'	on the impact that alcohol is perceived to have on the general public.
	<ul style="list-style-type: none"> <li>Numbers of 'off sales' premises in city and total square metres of floor space for alcohol sales</li> </ul>	Licensing Board	190 off-sales locations 7,033 square metres	This type of data is very relevant to overprovision in the city.
<b>A5 / B5</b>	<ul style="list-style-type: none"> <li>Children on child protection register affected by parental alcohol use</li> </ul>	ACC Child Protection	2011/12 – Q1-30; Q2-16; Q3-21; Q4-13 2012/13 – Q1-14; Q2-22; Q3-18	These types of data are very relevant indicators on the impact that alcohol is having on children across the city.
	<ul style="list-style-type: none"> <li>Percentage of 15 year old pupils drinking on a weekly basis and the mean consumption in the last week</li> </ul>	Scottish Schools Adolescent Lifestyle and Substance Use Survey (SALSUS)	2010 report for Aberdeen City pupils: 11% of 13 year olds and 34% of 15 year olds said they had drunk alcohol in the week prior	

			to the survey 2% of 13 year olds and 20% of 15 year olds reported that they usually drink at least once a week	
	<ul style="list-style-type: none"> <li>• Test purchase (number of failures)</li> </ul>	Police	Aug 2009 – July 2010 – 3 Aug 2010 – July 2011 – 5 Aug 2011 – July 2012 – 0 (as test purchasing in Grampian suspended while legal issue resolved)	This type of data provides an indicator to the Licensing Board on how well licensed premises are being operated across the city.
<b>C5</b>	<ul style="list-style-type: none"> <li>• Underage drinking figures</li> </ul>	Police / Community Safety Partnership	CSP Dec 2012 report: 2011/12 - 132	This type of data is very relevant to the impact that alcohol is having on young people within the city.

\* This type of data should be available within the report being prepared by NHS Grampian

~ The Fire service has started to collect data on this. Further work is being done to ensure that it is robust and to ensure that it can be a useful measure for identifying future trends.