

NHS Lothian & EADP Response

April 2024

Response submitted by:

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I consent to being contacted about this consultation:

Yes

Responding as:

Organisation (Public Sector) – NHS Lothian Public Health & Health Policy Directorate
and Edinburgh Alcohol & Drug Partnership

Do you think the council should continue to have areas of overprovision or should
they be removed entirely?

- Yes, it's right to have areas of overprovision
- No, I don't think we should have this classification anymore
- Don't know

Do you think there should continue to be overprovision of licensed premises in any of the
localities designated by the Board as being subject to overprovision in its 2018 assessment?

	Yes, should continue to be an area of overprovision	No, should no longer be an area of overprovision	Don't know
Old Town, Princes Street and Leith Street	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Tollcross	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Deans Village (covering the Dean Village area)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Southside, Canongate and Dumbiedykes	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

If you answered yes to any - does your answer relate to all licensed premises or licensed premises of a particular type, e.g. pubs, restaurants, hotels, convenience stores, supermarkets, entertainment venues, or something other?

All premises.

Note: the localities of Deans Village and Southside, Canongate and Dumbiedykes. When reviewing the latest data, these two localities did not meet our criteria for proposing as areas of overprovision. Although alcohol density was extremely high (top 10%) for both areas (on and off sales), they did not contain a data zone experiencing very high aggregated alcohol harm (see definition below).

We have based our current analysis and recommendations on intermediate zones which:

- *contains at least one data zone experiencing a very high aggregate alcohol related harm (i.e. those with rates of both alcohol related health harm and criminal justice harm in the top 10% of Edinburgh data zones); and*
- *contains at least one data zone with a very high rate of provision of off sales or on sales premises (i.e. with rates of these respective premise type in the top 10% of Edinburgh data zones)*

Thinking about the licensing objectives above, please explain your answer to Q5.

Please see general text provided below.

Are there areas/localities that you would like to see added to our areas of overprovision? If yes, please either describe the area or provide a postcode. Please explain your answer to Q7.

Yes. Please see general text provided below.

General Comments from NHS Lothian:

The purpose of the licensing system in Scotland is to regulate the retail provision of alcohol in such a way as to mitigate the risks of harm to individuals and society from its use. The job of a licensing board is to decide whether any proposed further expansion in the supply of alcohol, through additional licensed premises, capacity or hours is compatible and consistent with the licensing objectives and the wider public interest¹.

Overprovision is where there are problems linked to the number and type of premises in an area. Boards have the flexibility to decide the approach they take to addressing overprovision in their area and can focus on only those factors that cause them concern in the light of the evidence. A licensing board must refuse applications for new premises licences or extensions in capacity in areas where it judges that the granting of an additional licence or extended capacity could result in overprovision of licensed premises.

There has been good evidence for over a decade that increased alcohol outlet density is associated with harms to health². Overprovision of alcohol creates harm by directly increasing opportunities for purchases, and influences the perceived normality of alcohol consumption, including the exposure to children and young people. Overprovision also makes it more difficult for people to recover from alcohol dependence³. Specifically within Scotland, researchers at the University of Edinburgh have found that alcohol related mortality and morbidity are significantly higher in neighborhoods with a greater density of alcohol outlets⁴. This relationship was particularly striking for off-sales outlet density.

¹ <https://www.alcohol-focus-scotland.org.uk/media/263089/AFS-Resource-Section-4.pdf>

² Campbell C, Hahn R, Elder R et al. The effectiveness of limiting alcohol outlet density as a means of reducing excessive alcohol consumption and alcohol-related harms. *American Journal of Preventive Medicine* 2009; 37(6):556–569.

³ <https://pubmed.ncbi.nlm.nih.gov/28886441/>

⁴ [https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4415114 \(%2015%25%20higher%20mortality\)](https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4415114 (%2015%25%20higher%20mortality)).

The Centre for Research on Environment Society and Health (CRESH) is a virtual centre joining scientists from the Universities of Edinburgh and Glasgow. Their research is focused on exploring how physical and social environments can influence population health, for better and for worse. This newly available CRESH data provides further evidence of the links between alcohol availability and harm in Scotland. Information was gathered on alcohol outlets, health harms and crime rates within neighbourhoods across the whole of Scotland. This data is available online on the CRESH WebMap at <https://creshmap.com/>

Below is a summary of the data relating to alcohol density for all retailers, on sale retailers and off sale retailers.

	All Sales (2023)	On Sales (2023)	Off Sales (2023)
City of Edinburgh	4.4	3.3	1.0
East Lothian	3.3	2.4	0.9
Midlothian	2.6	1.4	0.8
West Lothian	2.5	1.5	1.0
Lothian	3.7	2.7	1.0
Number of outlets per 1,000 persons			
4 th highest quintile in Scotland			

We have provided a summary of the data below, and a description of how we have used it to identify areas of overprovision in Edinburgh. We are hopeful this data will support the license board to improve its understanding of alcohol and its impacts and inform your Edinburgh Strategy for the next three years.

We analysed the following data provided by CRESH:

- Data zones⁶ and intermediate zones in the City of Edinburgh Council area
- Standardized ratio⁸ for hospital stays related to alcohol
- Crime rate (recorded crimes of violence, sexual offences, domestic housebreaking, vandalism, drugs offences, and common assault per 10,000 people)
- Number of total alcohol outlets (both on- and off-premise) per 1000 persons (2023)
- Number of on-premise alcohol outlets (buy and consumption on-premise) per 1000 persons (2023)
- Number of off-premise alcohol outlets (buy and consumption off-premise) per 1000 persons (2023)

There is no formal definition of ‘overprovision’ in terms of a simple numerical formula for pinpointing the threshold between provision and overprovision. Determining overprovision involves the application of reason and judgement in the interest of the community.⁵

As of 31 March 2022, Edinburgh has 1,952 alcohol outlets⁶ (on and off trade), which means there is approximately one outlet for every 225 residents aged 18 and over (and one outlet for

⁵ <https://www.alcohol-focus-scotland.org.uk/media/263089/AFS-Resource-Section-4.pdf>

⁶ <https://www.gov.scot/publications/scottish-liquor-licensing-statistics/>

every 56 'harmful' drinkers in the city (consuming over 14 units a week)⁷. It is therefore not useful to compare Edinburgh to national averages, as Edinburgh already has the highest number of alcohol outlets. It may be more meaningful to look at areas within Edinburgh which are overprovided, compared to the rest of Edinburgh.

We have therefore based our current analysis and recommendations on intermediate zones which:

- contains at least one data zone experiencing a very high aggregate alcohol related harm (i.e. those with rates of both alcohol related health harm and criminal justice harm in the top 10% of Edinburgh data zones); and
- contains at least one data zone with a very high rate of provision of off sales or on sales premises (i.e. with rates of these respective premise type in the top 10% of Edinburgh data zones)

The following intermediate zones have extremely high levels of alcohol related harm (health and criminal), alongside the highest alcohol outlet rates (per 1000 persons). We therefore recommend that these intermediate zones are assigned as overprovision areas for **all sales**.

- Tollcross (top 1% for all sales)
- Old Town, Princes Street and Leith Street (all intermediate zones within top 2% for all sales)
- Great Junction Street (top 5% for all sales)
- South Leith (top 3% for all sales)

The following intermediate zones have extremely high levels of alcohol related harm (health and criminal), alongside the highest alcohol outlet rates (per 1000 persons) for off sales. We therefore recommend that these intermediate zones are assigned as overprovision areas for **off sales**.

- Murrayburn and Wester Hailes North (top 2% for off sales)
- Restalrig and Lochend (top 7% for off sales)
- Muirhouse (top 6% for off sales)

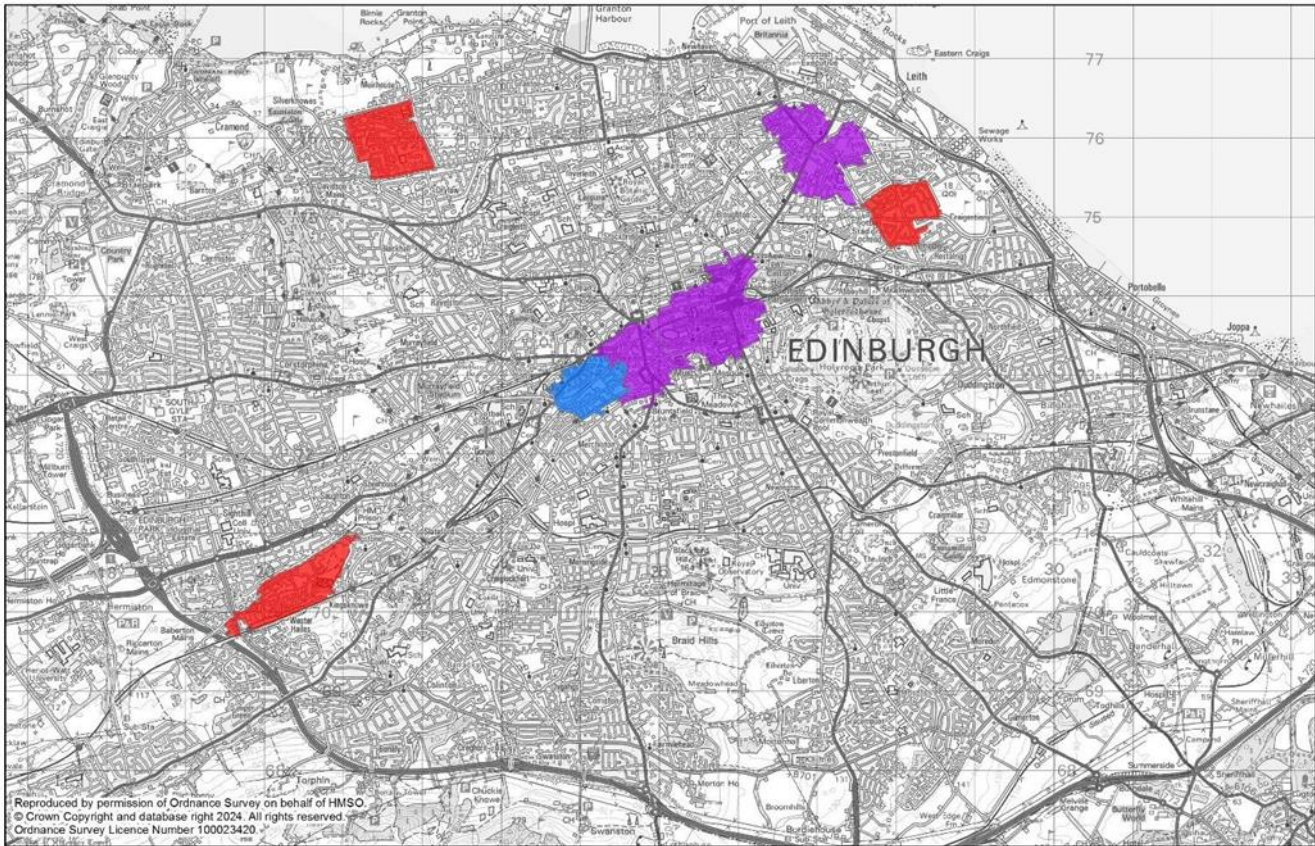
The following intermediate zones have extremely high levels of alcohol related harm (health and criminal), alongside the highest alcohol outlet rates (per 1000 persons) for on sales. We therefore recommend that these intermediate zones are assigned as overprovision areas for **on sales**.

- Dalry and Fountainbridge (top 7% for on sales).

⁷ <https://www.nrscotland.gov.uk/statistics-and-data/statistics/statistics-by-theme/population/population-estimates/mid-year-population-estimates/mid-2021>

The below map indicates the proposed overprovision areas:

- The purple area indicates overprovision for all sales
- The red area indicates overprovision for off sales
- The blue area indicates overprovision for on sales.



The understand that the License Board has discretion on the size of areas to declare as overprovision zones. We recommend that the board consider overprovision by intermediate zone, rather than data zones. Data zones are small (in some cases taking minutes to cross) and therefore it is difficult to be confident that the impact of very dense areas of outlets will be effectively described by the boundaries of the data zone itself. If we examine only data zones with the greatest harm and outlet density and declare only those small areas overprovided, the existing nearby provision will be ignored and new outlets will simply be displaced to the periphery of data zone boundaries, spreading the overprovision rather than addressing it.

We are keen to discuss this information further with the license board in the forthcoming evidence session. If the board have any questions they wish us to consider in advance, please make the named contacts aware.

Contacts for further information:

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