

Education People and Business
Legal & Democratic Services
12 Strathkelvin Place
Kirkintilloch
G66 1TJ

East Dunbartonshire HSCP
Kirkintilloch Health & Care Centre
10 Saramago Street
Glasgow
G66 3BF

David.Radford@ggc.scot.nhs.uk

6th January

2023

Dear Ms Donnelly,

East Dunbartonshire Statement of Licensing Policy 2023-2028 Informal Consultation

Thank you for your letter regarding the above, which I received on 11th October 2022.

The HSCP would like to make the following comments below.

Overprovision

In 2018 the East Dunbartonshire HSCP Public Health Improvement Team prepared an assessment report on Overprovision of Alcohol Sales Capacity in East Dunbartonshire.

The report recommended that following data analysis by intermediate datazone on the number of alcohol outlets, alcohol related health indicators, alcohol related crime and incidents and deprivation that Hillhead remained an area overprovision for off-sales premises, and that Kirkintilloch West be considered as an area of overprovision for on and off-sales premises

Following consultation in the 2018-23 Statement of Licensing Policy Hillhead and Kirkintilloch West were assessed as being areas of overprovision for off-sales premises.

NHS Greater Glasgow & Clyde Public Health Directorate have undertaken data analysis of alcohol related hospital admissions, alcohol specific deaths and deprivation by intermediate datazones across Greater Glasgow & Clyde, and has categorised each intermediate datazone based on the Scottish average and rate changes from 2015 to 2022.

The East Dunbartonshire HSCP Public Health Improvement Team have also undertaken preliminary data analysis of alcohol related hospital admissions, alcohol related mental health admissions and alcohol specific death data by intermediate datazone in East Dunbartonshire and ranking them based on alcohol related harm.

Based on the analysis of alcohol related health data as above, the HSCP recommends that:

- Hillhead remains as an area of overprovision for off-sales premises
- East Clober & Mains Estate is considered an area of overprovision for off-sales premises
- Harestanes is considered an area of overprovision for off-sales premises
- Kirkintilloch South is considered an area of overprovision for off-sales premises
- Kirkintilloch West is no longer considered an area of overprovision based on alcohol related health data; however the HSCP request that alcohol related crime and incidents is reviewed for Kirkintilloch West

For further information regarding alcohol related health harm data please contact Jane Jeffrey jane.jeffrey@ggc.scot.nhs.uk

Minimum Unit Pricing

The HSCP is awaiting further clarification from NHS Greater Glasgow & Clyde and/or Public Health Scotland regarding the impact of Minimum Unit Pricing on alcohol related harm and its role, if any, within overprovision.

Licensing Hours

The HSCP agree with the current licensing hours and do not support any extensions to the licensed hours.

Description of Licensed Premises

The HSCP do not believe there should be a separate category of entertainment premises.

Licensing Conditions for Alcohol Delivery

The HSCP would like the Licensing Board to consider the following conditions for alcohol delivery to be included in the new Licensing Policy:

- If licensed premises employ their own delivery staff these staff members should be trained in Challenge 25 age verification process to same level as rest of the staff and ensure they undertake this process when delivering alcohol
- If a third party is employed for deliveries it is the responsibility of the premises licence holder to ensure that the delivery partner follows the Challenge 25 age verification process when delivering items including alcohol
- Any deliveries including alcohol must not be left with anyone under 18 years old, anyone who is visibly intoxicated/"drunk" or in a 'safe space' outside the home
- Deliveries containing alcohol should only be permitted when delivering with food unless the licenced premises is a dedicated off sales premises

Supplementary Statement of Licensing Policy

The HSCP have no comments regarding the Supplementary Statement of Licensing Policy.

Other

The HSCP wish to highlight the Alcohol Focus Scotland report on Online Alcohol Sales & Deliveries: A survey of young people in Scotland: [extension://elhekieabhbkmcefcobjddigicaadp/https://www.alcohol-focus-scotland.org.uk/media/440154/online-sales-and-deliveries-of-alcohol.pdf](https://www.alcohol-focus-scotland.org.uk/media/440154/online-sales-and-deliveries-of-alcohol.pdf)

- To note there was no reported young people from East Dunbartonshire who took part in the survey.
- The HSCP would like to ensure that young people are consulted with regarding the new Licensing Policy particularly to gather their views on online sales and deliveries of alcohol and what they would recommend locally.

If you require further information, please do not hesitate to contact myself at the above address.

Yours sincerely,

David Radford
Health Improvement & Inequalities Manager

