



4 February 2013

Dear Sirs

A CONSULTATION ON DELIVERING THE GOVERNMENTS POLICIES TO CUT ALCOHOL FUELLED CRIME AND ANTI-SOCIAL BEHAVIOUR

I would like to respond to the above mentioned consultation on behalf of the Newcastle's Wellbeing for Life Board, which is the shadow statutory Health and Wellbeing Board for Newcastle. In Newcastle, we took advantage of the flexibilities available to us and as a result our Board has a membership that extends beyond the minimum statutory requirement. Therefore, I attach a list of the organisations/sectors represented through this response as an Appendix.

Every day our partners see the impact that alcohol is having on individuals, families and their own organisations in Newcastle, for example:

- Newcastle has one of the highest rates of alcohol-attributable admissions in England (ranked 304th out of 326)
- Newcastle has one of the highest rates of male alcohol related mortality in England (ranked 314th out of a possible 326)
- The region experiences the highest under 18 alcohol specific hospital admissions in England
- Approximately 50% of domestic abuse in Newcastle is linked to alcohol
- Alcohol misuse has been identified as an issue in 28% of all child protection conferences in Newcastle.
- Average unit consumption on a daily and weekly basis for males and females in the North East is the highest of all the Strategic Health Authorities (SHAs) nationally

And there is also the financial impact on Newcastle.

- £28.27 million in costs to the NHS
- £44.19 million in crime and licensing costs
- £58.86 million in costs to the workplace and wider economy
- £18.31 million in social services costs

That works out at £512 for every man, woman and child in Newcastle. This comes at a time when all partners have to continue to deliver front line services with significantly reduced resources.

In the development of our Wellbeing for Life Strategy (the statutory Health and Wellbeing Strategy for Newcastle), alcohol along with smoking has been identified as the top behavioural risks associated with poor wellbeing and health in the city and it is one of the issues that requires collaborative working as it impacts on all partners. There is good evidence from the World Health Organisation that by addressing the affordability, availability and the advertising of alcohol then we can expect to see a reduction in overall consumption.

We are concerned that in Newcastle alcohol is available for as little as 16 pence per unit, that's cheaper than bottled water. It is very difficult for us locally to regulate low cost alcohol so that is why we support the introduction of a minimum unit price. This intervention is a highly targeted and effective approach that would have the greatest impact on reducing consumption in younger and heavier drinkers. It is these drinkers that colleagues in the NHS regularly pickup by ambulance, see in their emergency departments and are frequently admitted to hospital. However, we believe that the level proposed of 45p per unit does not go far enough and needs to be set at an effective and realistic level – no lower than 50p per unit. This is the level recommended by the previous Chief Medical Officer and the evidence from Sheffield shows that a 50p level would save annually an additional 18,000 crimes and would reduce consumption by a further 2.4%. We are also concerned about cross border issues for the North East if England sets a different level than Scotland.

We also welcome the introduction of health as a licensing objective for cumulative impact policies. We are getting better at understanding which neighbourhoods in our city are experiencing greatest harm caused by alcohol through sharing data about health, crime and child protection issues and we need to be able to use this information in the licensing process. Although alcohol related crime still causes concern, it is the long term impact on health of alcohol that is particularly concerning the partnership for example between 2001 and 2008 deaths by alcoholic liver disease rose by 36%. However, we believe that this proposal should go further and that health should be given equal weight with the other licensing objectives and not just limited to cumulative impact policies.

In terms of the other proposals being brought forward in the consultation:

- We support the plan to introduce a ban on multi-buy discount as this will help level the playing field between the on-trade and off-trade. In Newcastle over 50% of alcohol is purchased from the off-trade and consumed at home and over 50% of people admit preloading at home before a night out, causing problems in our City Centres.
- Whilst the current mandatory licensing conditions on irresponsible drinks promotions in pubs and clubs, are having some effect, they are not in line with current drinks promotions. Any offers which encourages greater levels of consumption than intended should not be permitted such as price-based promotions, drinks sold in one large container for consumption from that container, e.g. 'goldfish bowls', mobile sales, e.g. shots sold from a tray or dispensed from a tank at your table, offering an alcoholic drink cheaper than one without alcohol.
- Whilst we would support a reduction in burdens on business, we are concerned that a relaxation of the regulation on any businesses which sell alcohol will only increase the availability and send out concerning messages about the place that alcohol has in our culture.

This consultation is a real opportunity to make significant progress in tackling alcohol misuse and we would urge the Government to take note of the independent evidence base from police, public health and other frontline professionals and reduce the affordability and availability of alcohol.

Yours sincerely

