

**Additional Information for Edinburgh License Board Consultation
From NHS Lothian Public Health & Edinburgh Alcohol and Drug Partnership
Contacts for further information:**

flora.ogilvie@nhslothian.scot.nhs.uk and david.williams@edinburgh.gov.uk

As referred to in our previous submissions, we have now received data from The Centre for Research on Environment Society and Health (CRESH) which allows us to provide recommendations to the License Board on areas of alcohol license overprovision within Edinburgh, for both on and off sales.

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 interest.¹

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 health.² 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 dependence.³ Specifically within Scotland, researchers at the University of Edinburgh have found that alcohol related mortality and morbidity are significantly higher in neighbourhoods with a greater density of alcohol outlets.⁴ This relationship was particularly striking for off sales outlet density.

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 will soon be available online in the Alcohol Outlet Availability and Harm Profiles, and the CRESH WebMap. In the interim, we have provided a summary of the data below, and a description of how we have used it to identify areas of over provision 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.

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/#:~:text=An%20IQR%20increase%20in%20off,%2C%2015%25%20higher%20mortality>

We analysed the following data provided by CRESH:

- Data zones⁵ and intermediate zones⁶ in the City of Edinburgh Council area
- Standardized ratio⁷ for hospital stays related to alcohol⁸
- Crime rate (recorded crimes of violence, sexual offences, domestic housebreaking, vandalism, drugs offences, and common assault per 10,000 people)⁹
- Number of total alcohol outlets (both on- and off-premise) per 1000 persons (2020)
- Number of on-premise alcohol outlets (buy and consumption on-premise) per 1000 persons (2020)
- Number of off-premise alcohol outlets (buy and consumption off-premise) per 1000 persons (2020)

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.¹⁰

As of 31 March 2022, Edinburgh has 1,952 alcohol outlets¹¹ (on and off trade), which means there is approximately one outlet for every 225 residents aged 18 and over (and one outlet for every 56 ‘harmful’ drinkers in the city (consuming over 14 units a week)).¹² 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.

Similarly to our last submissions, we have therefore based our current analysis and recommendations on intermediate zones which:

- contains at least one datazone 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 over provision 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)

⁵ Data zones are designed to have roughly standard populations of 500 to 1,000 household residents, nest within council areas, have compact shapes that respect physical boundaries where possible, and to contain households with similar social characteristics.

⁶ Intermediate Zones were designed to meet constraints on population thresholds (2,500 - 6,000 household residents), to nest within local authorities, and to be built up from aggregates of data zones.

⁷ Standardised ratios (e.g. alcohol-related hospital admissions) are adjustment for age and sex so that comparisons can be made between areas that may have populations with different age or gender structures. A value of 100 is the Scotland average for a population with the same age and sex profile.

⁸ Data from Scottish Index of Multiple Deprivation 2020

⁹ Data from Scottish Index of Multiple Deprivation 2020

¹⁰ <https://www.alcohol-focus-scotland.org.uk/media/263089/AFS-Resource-Section-4.pdf>

¹¹ <https://www.gov.scot/publications/scottish-liquor-licensing-statistics/>

¹² <https://www.nrscotland.gov.uk/statistics-and-data/statistics/statistics-by-theme/population/population-estimates/mid-year-population-estimates/mid-2021>

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 over provision areas for **off sales**.

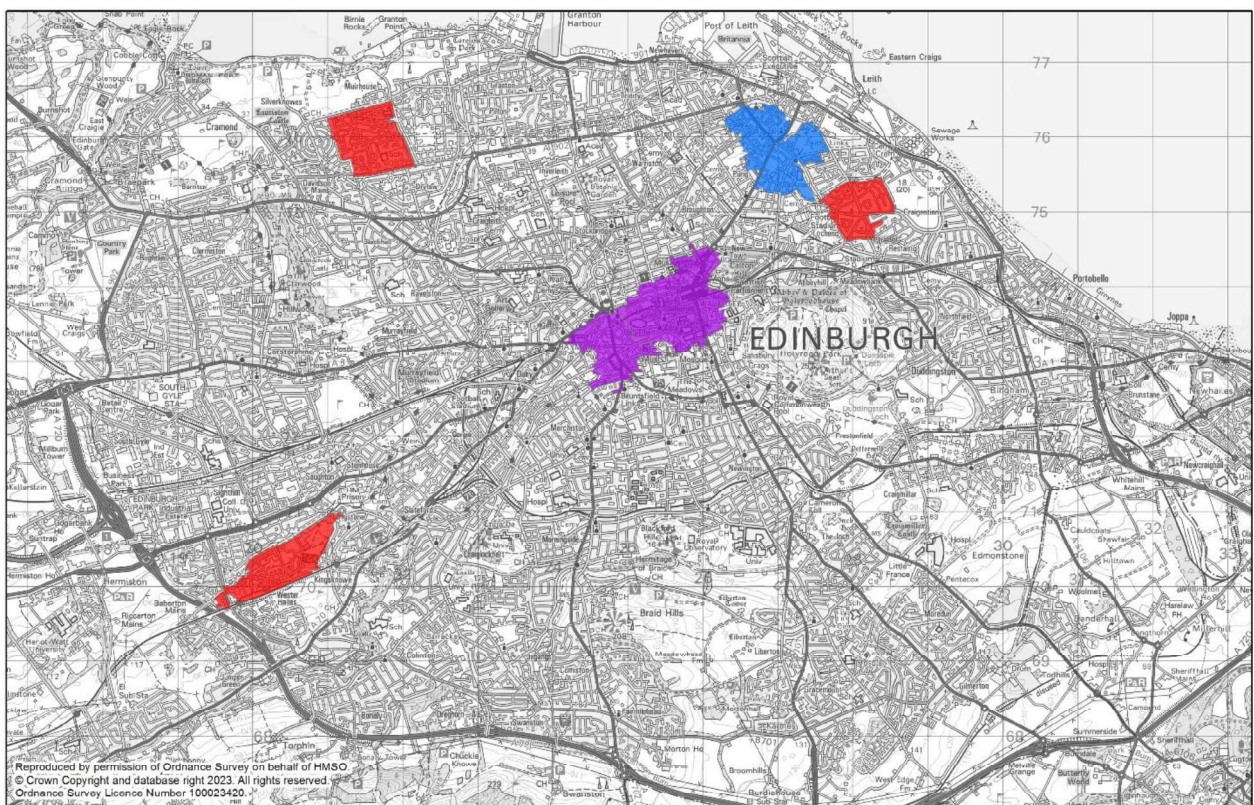
- Murrayburn and Wester Hailes North (top 1% for off sales)
- Restalrig and Lochend (top 2% for off sales)
- Muirhouse (top 4% for off sales)

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 over provision areas for **on sales**.

- Great Junction Street (top 5% for on sales)
- South Leith (top 3% for on sales)

The below map indicates the proposed over provision areas:

- The purple area indicates over provision for all sales
- The red area indicates over provision for off sales
- The blue area indicates over provision 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 datazone 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 datazone 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.