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**From:** Mark Leyshon <MLEyshon@alcoholconcern.org.uk>  
**Sent:** 13 November 2015 16:12  
**To:** Trwyddedu  
**Cc:** Andrew Misell  
**Subject:** Gwynedd Council Statement of Licensing Policy

Hi,

Please find below Alcohol Concern Cymru's comments in response to the consultation on Gwynedd Council's draft Statement of Licensing Policy 2015-2020, which I hope you will find helpful.

#### Introductory section

Given that the protection of public health is not a licensing objective under the 2003 Act, it is important that the SLP considers how to integrate their role into licensing policy and how their role might be beneficial for the licensing process. SLPs should be seen as a means of joining up overarching strategies and policies, and in this case as a means of applying public health principles to licensing. We therefore feel the Introductory section could be strengthened by referencing authority-wide aims for health and well-being, and encouraging applicants to show through operating schedules how they will contribute to Gwynedd Council's wider aims of promoting healthier lifestyles.

A good example of referencing health and well-being aims in an SLP is from the London Borough of Barking & Dagenham <https://www.lbbd.gov.uk/wp-content/uploads/2014/09/licensingpolicy2012.pdf> (pg7-8), which specifically states that the Authority will look more favourably on applications that will "promote healthy lifestyles by encouraging responsible drinking". In this example, there is also a more extensive list of applications that will be less favourably looked upon that you might wish to consider, including applications for very late/early licences in residential areas and areas suffering high levels of anti-social behaviour, among others.

#### Appendix 3: Alcohol and health in Wales

It is increasingly considered good practice for SLPs to incorporate health statements that acknowledge and demonstrate understanding of the impact of alcohol consumption on residents and the importance of addressing these issues. We are therefore pleased to see the inclusion of Appendix 3, however this would be of additional value if more local alcohol statistics are also referenced. The advantage of including such data is that it can provide a holistic view of the local area, allowing health concerns to be highlighted when they are often lost behind the premises by premises approach that the rest of the policy will take.

A good example can be found in Appendix A of the London Borough of Islington's SLP [http://www.islington.gov.uk/publicrecords/library/Environmental-protection/Business-planning/Policies/2012-2013/\(2013-02-01\)-Licensing-Policy-2013-2017.pdf](http://www.islington.gov.uk/publicrecords/library/Environmental-protection/Business-planning/Policies/2012-2013/(2013-02-01)-Licensing-Policy-2013-2017.pdf) (pg 41).

#### S10.3 Conditions:

It may be helpful to include as an Annex details of possible tough conditions that may be applied to licenses, for example around irresponsible promotions and displays of alcohol. Whilst s182 of the Licensing Act sets out guidance for applying mandatory conditions to control irresponsible promotions, a good SLP can be used to encourage responsible consumption of alcohol, and where good health-focused evidence is secured that shows that licensing objectives have been compromised, then a licensing authority can consider imposing controls on drinks promotions in order to deal with local problems.

Brighton and Hove City's SLP, for example, sets out in Annex B (p39) a set of conditions that may be applied to problem premises, including that no displays of advertising should be seen from outside of the premises, or that no alcohol is displayed next to goods that may be of appeal to young people. See [http://www.brighton-hove.gov.uk/sites/brighton-hove.gov.uk/files/downloads/licence\\_applications/Statement\\_of\\_Licensing\\_Policy\\_2012\\_Final\\_310112.pdf](http://www.brighton-hove.gov.uk/sites/brighton-hove.gov.uk/files/downloads/licence_applications/Statement_of_Licensing_Policy_2012_Final_310112.pdf)

Newcastle City Council goes further, outlining the possibility of imposing a minimum price policy on problem premises:

[http://www.newcastle.gov.uk/sites/drupalncc.newcastle.gov.uk/files/wwwfileroot/business/licences/statement\\_of\\_licensing\\_policy\\_2013-2018\\_final.pdf](http://www.newcastle.gov.uk/sites/drupalncc.newcastle.gov.uk/files/wwwfileroot/business/licences/statement_of_licensing_policy_2013-2018_final.pdf) (p28).

If you have any queries about the issues raised above, please do not hesitate to get in touch.

Many thanks,  
Mark



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