

Part 2**WEST DUNBARTONSHIRE LICENSING BOARD****CONSULTATION ON OVERPROVISION OF LICENSED PREMISES****Scope of the Consultation**

In light of the data provided to it in 11 June 2013, the licensing Board decided to consult on whether there was overprovision of certain types of licensed premises in certain areas or localities.

The Board wishes to consult on whether there is overprovision of the foregoing types of premises in these areas. The Board is keen to get the views on:-

- (a) Whether there is overprovision of premises within West Dunbartonshire licensed to sell alcohol.

Yes.

- (b) If there is such overprovision, in which area is there overprovision?

Whitecrook, Dalmuir, Drumry/Linnvale/North Kilbowie, Parkhall/Radnor Park, Mountblown/Parkhall, Goldenhill/Hardgate/Parkhall, Faifley/Hardgate, Dumbarton Central/Silverton/Townend, Duntocher, Dumbarton East-Barnhill/Crosslet/Milton/Bowling, Dumbarton West-Brucehill/Dennytown/Kirktonhill, Dumbarton North East-Bellsmyre/Silverton East, Bonhill, Renton, Jamestown/Old Bonhill, Alexandria/Balloch, Balloch North East-Gartocharn/Mill of Haldane.

- (c) If there is overprovision, in what categories of types of premises is there overprovision?

Large supermarkets, and off sales/Convenience stores, night clubs and public houses.

- (d) If there is overprovision, why is there such overprovision?

The areas all have levels of alcohol related deaths, acute and psychiatric hospital discharges or levels of alcohol related brain damage which are higher than the Scottish average. There is thus significant public health evidence that the consumption of alcohol in this area continues to have a detrimental impact on health. There is a well documented relationship between the availability of alcohol and alcohol consumption.

(e) Do you agree that the Board should refine its policy to consider the positive health benefits associated with increased employment opportunities as a factor that applicants can demonstrate in support of their application and a factor that may rebut such a presumption?

No. There are positive health benefits from employment, but it does not follow that the opening of licensed premises will automatically result in increased employment opportunities or positive benefits.

There are many town centres up and down the country which have become desolate due to the opening of large supermarkets and out of town centres. The business attracted by these premises is gained by diverting customers from existing businesses in the area, leading to many smaller businesses closing down so there is no net gain in economic terms. They have also resulted in reduced choice and competition in the market and loss of the cultural vitality and diversity in smaller towns. This loss of cultural diversity may have an impact on the tourist industry as customers seek a more diverse, friendly and personal environment in which to spend their holiday.

Additionally, larger premises are more likely to sell cheap alcohol as the smaller stores cannot compete in terms of price with the larger multinational stores. So, even if some jobs are created in the locality, which offered employment opportunities for the minority, it could still have wider adverse health and economic impacts on the wider population.

The guidance also states that "the Board cannot take into account the need or demand for the licensed premises in the locality. Commercial considerations are irrelevant to a policy which is designed to protect the wider interest".

It is therefore inappropriate to use the economic considerations to justify the opening of a licensed premise in an area where there is documented evidence of alcohol related harm no matter what the economic arguments presented by the agent or licensee.