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Liquor Review Team  
27 FEB 2007  
**RECEIVED**

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**Re: DRAFT LICENSING AND REGISTRATION OF CLUBS  
(AMENDMENT) (NORTHERN IRELAND) ORDER 2007**

The EHSSB welcomes the opportunity to respond to the consultation document on Draft Licensing and Registration of Clubs (Amendment) N.I. Order 2007.

The EHSSB remains very concerned about the proposed extension of opening times to 2am for the following reasons.

1. The extension of opening hours to 2 o'clock will not do anything to eliminate the problem of large numbers of people coming on to the streets all at once. This proposal will lead to further increased pressures on:
  - Local hospital services (particularly A&E resources)
  - Quality of life for local residents
  - Ambulance and other emergency services.
2. The Department of Social Developments Review of the Literature on the impact of licensing and other controls on the consumption of Alcohol stated in point 6 of its findings;

*"In terms of the general restriction of alcohol consumption, it is suggested that there is evidence to support the idea that longer hours of alcohol sales may be linked to increased problems with alcohol related crime and disorder, although the evidence is mixed on this issue.*

*Studies have also suggested that staggered closing times may have an impact on disorder."*

3. Chikritzhs T and Stockwell T (2002) examined the impact of extended trading hours in Western Australia. They found that the effect of extending trading hours in Perth by one hour at the weekends resulted in a 70% mean increase in violent assault.
4. A recent article by Plant et al in the International Journal of Drug Policy (2005) found that increasing the availability of alcohol invariably leads to an increase in consumption and consequently harm. This has been borne out by international experience. Any increase in availability needs to bear this in mind.
5. A recent study by the University of London (Queen Mary College) found that binge drinking is responsible for 56% of all violence within the UK. Extending the licensing hours will only increase the amount of binge drinking and subsequent harms. This is at a time when the DHSSPS has set targets for the HPSS to decrease the level of binge drinking by 5% within the incoming financial year.
6. In Northern Ireland we are currently struggling with high levels of binge drinking, accidents and road deaths associated with people under the influence of alcohol, and high levels of work absenteeism. Increasing licensing hours during the week will only add to these problems. With opening hours to 2 am on all weekdays there will be more people over the drink-driving limit attempting to drive to work in the mornings. Increased availability means an increase in alcohol-related problems.

### **Exceptional permitted hours**

The EHSSB welcomes the proposals for extended opening hours for special occasions such as major sporting events or other special circumstances. However, we are of the opinion that these should be well controlled and that there should be a limit to the number of "special openings" that a licensed premises could be granted each year.

## Children's Certificates

The EHSSB is also supportive of the Children's Certificates and the proposal to relax conditions in relation to children on licensed premises for family events such as weddings, as long as they are held in private/separate function rooms. However it must be emphasized that in the past there was not proper enforcement of Children's Certificates and this is absolutely essential for the protection of children and young people.

## Conclusion

It must be accepted that some of the proposed new legislation will give more structure and controls over licensed premises and, if strictly enforced, would be welcomed.

However, the increase in licensing hours as presented in the new legislation will serve no useful purpose other than to increase availability of alcohol. This in turn will increase alcohol-related problems and will be detrimental to the promotion of public health. Under the New Strategic Direction for Alcohol and Drugs 2006-2011 (DHSSPSNI), there is an emphasis on decreasing the harms caused to both individuals and society from alcohol consumption and this will not be realised with an increase in licensing hours.

Yours sincerely

*Paula Kilbane*

ppp · Dr Paula Kilbane  
Chief Executive