

Dear Sirs

The Inverclyde Licensing Board have found their ability to deliver public health objectives via the licensing system to be very problematic. Much of the information available is in the form of public health data sets for defined areas within our local authority area. What was obvious to our Board was that the number of licensed premises within certain areas bore no correlation to the alcohol related illnesses within said area. For example, in one of Inverclyde's worst areas for alcohol related illness there are no licensed premises whatsoever. Boards are expected to make decisions based on the law and supporting evidence. It is accordingly impossible to make a decision to refuse a new premises application on public health grounds when those premises have never been involved with the sale of alcohol and where the number of alcohol outlets within a particular area are very few in number in any event.

Inverclyde Licensing Board had an area of overprovision in place for approximately 5 years. This has now been removed as the Police figures for crime and the NHS figures for health showed that there had been no discernible decrease in figures for the area covered by overprovision over the 5 year period. It is open to anyone to seek Judicial review at any time on a Board's Policy and accordingly the Board felt it could no longer support an area of overprovision.

Inverclyde Licensing Board are of the view that the current law does not empower Boards to deliver public health objectives.

Inverclyde Licensing Board fully supports the role of LSOs in its area. There are currently 2 LSOs operating and they are sufficiently resourced to carry out all their duties.

Yours faithfully

James Douglas