



Bwrdd Iechyd Prifysgol
Cwm Taf Morgannwg
University Health Board

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APPENDIX I

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17.02.2020
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Public Health

Mr. Aneurin Hughes,
Licensing Officer,
Merthyr Tydfil County Borough Council,
Civic Centre,
Castle Street,
Merthyr Tydfil.
CF47 8AN

Dear Mr. Hughes

In accordance with the Health Board's position as a responsible authority, I can confirm we have received the following review of a licencing application at:-

Re-Evolution, Bethesda Street, Merthyr Tydfil, CF47 8LR

CTMUHB has concerns about this licence on the grounds of the potential adverse effect on the health of our population, particularly of children, and the risk of wider social harms within the community.

CTMUHB area has the highest incidence in Wales of alcohol related admissions and mortality. Alcohol misuse is a major contributing factor to the burden of ill health and inequalities in our area.

The attached summary demonstrates the key concerns in respect to this application, together with an overview of the background information on which they are based.

CTMUHB would also ask to withhold the right to comment further, should additional information be brought to their attention at a later date.

Kind regards

Joanne Sullivan

Public Health Practitioner, Cwm Taf Morgannwg Public Health Team
On behalf of Kelechi Nnoaham, Director of Public Health, Cwm Taf Morgannwg UHB

Cyfeiriad Dychwelyd / Return Address:

Cwm Taf Morgannwg University Health Board, , Dewi Sant Hospital, Albert Road, Pontypridd, CF37 1LB

Cadeirydd/Chair: Professor Marcus Longley Prif Weithredydd (Dros Dro)/Chief Executive (Interim): Dr Sharon Hopkins

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Cwm Taf Morgannwg University Health Board is the operational name of the Cwm Taf Morgannwg University Local Health Board

Overview

Alcohol is a major cause of death and illness in Wales with around 1,500 deaths (4.9% of all deaths) attributable to alcohol each year. Alcohol misuse contributes to the risk of around 60 diseases. Liver disease is the only cause of premature mortality in Wales that is still increasing. CTMUHB has the one of the highest chronic liver disease premature mortality rates in Wales.

Evidence reported by Public Health Wales Observatory (2019) highlights Merthyr Tydfil as one of the Local Authority areas with the highest rates in alcohol specific* and alcohol-attributable hospital admissions** in Wales. Some of the highest rates in alcohol specific and alcohol attributable deaths were also recorded in CTMUHB. Both alcohol related hospital admissions and mortality are strongly associated with deprivation.

The Health Board has a statutory responsibility for the health of its population. We already know that alcohol misuse is a major issue within our Health Board area and places a huge burden on many parts of our health services and wider community.

**(Alcohol specific conditions are commonly defined as those conditions, such as alcoholic liver disease, which are 100 per cent attributable to alcohol).*

*** (Alcohol-attributable measures include those conditions which have been evaluated as partially, but not completely, caused by alcohol consumption when considered across the whole population).*

Protection of children from harm

'The Government believes that it is completely unacceptable to sell alcohol to children'. (Amended Guidance issued under section 182 of the Licensing Act 2003, June 2013)

Protecting children from alcohol related harm is crucial to the wellbeing, safety and future health of young people in Cwm Taf Morgannwg.

The Health Behaviour of School Aged Children Survey, commissioned by the Welsh Government and conducted every four years provides an in-depth understanding of young people's health and well-being. The most recent Health Behaviour of School Aged Children (HBSC) Survey 2017/18 (WG, 2019) reported that:

- 50% of boys in Cwm Taf drink more than one drink at one time – the highest percentage across Health Boards.
- Cwm Taf Health Board has the highest number of boys (53%) and girls (58%) who typically have more than one drink when they drink alcohol by Local Health Board
- 7% of boys and 8% of girls report who have been drunk at least four times in their life. This is amongst the highest level across Health Boards.

In addition, evidence from the Public Health Wales Observatory also reported that:

- When compared across the Health Boards in Wales, alcohol specific hospital admissions in children under the age of 18 was highest in Cwm Taf (PHW Observatory, 2014).

Comprehensive reviews have clearly highlighted that the consumption of alcohol in children and young people is linked with significant harm (Donaldson, 2009). The wide range of these potential harms are outlined by the Chief Medical Officer for Wales (Jewell, 2010) and includes:

- A range of developmental problems
- Increased risk taking behaviour

- Inappropriate sexual activity
- Violence

Evidence demonstrates that young people are more vulnerable than adults to the adverse effects of alcohol due to a range of physical and psycho-social factors.

In addition, the number of our children and young people who drink alcohol at a particularly young age and through binge drinking in an unsupervised manner is especially concerning, as it puts them at particular risk of harm. Some of the potential harms have been highlighted below:

1. There is evidence that young people may suffer high levels of harm if they begin drinking in parks, streets, and other unsupervised settings.
2. Young women who binge drink are more likely to have experienced regretted sex as well as forced, or attempted forced, sex. Alcohol use before sexual activity can result in condoms being used incorrectly or not used at all.
3. In the longer-term young people who binge drink in adolescence:
 - are more likely to be binge drinkers as adults
 - have an increased risk of developing alcohol dependence in young adulthood
 - are more likely to engage in drug use and experience dependence, be involved in crime, and achieve lower educational attainment as adults.
4. There is evidence that significant changes in brain structure accompany heavy drinking in adolescence, which may affect brain function during adulthood.
5. There is evidence to indicate that children who begin drinking at a young age will drink more frequently and in greater quantities than those who delay drinking and therefore, experience greater harm, including:
 - vulnerability to alcohol misuse in later adolescence
 - increased health risks, including alcohol-related injuries, involvement in violence and suicidal thoughts and attempts (Newbury-Birch, et al., 2009).

This overwhelming evidence has led to the recommendation by the UK Chief Medical Officer that an alcohol-free childhood is the healthiest and best option for all (Donaldson, 2009).

Considering the significant risks highlighted, CTUHB offer our support for a full licence review.

The prevention of public nuisance

Alcohol consumption is often seen as a problem that affects individual drinkers rather than other people. Research by Public Health Wales and Liverpool John Moore's University identified that almost 60% of adults in Wales had experienced at least 'one harm' from someone else's drinking in the last 12 months when assessed against 19 'categories of harm'. The types of harms experienced varied with the most common harms including feeling anxious at a social occasion; being kept awake due to noise or disruption; having a serious argument; being let down; feeling physically threatened, or experience of emotional neglect. Over two fifths (43.7%) of adults had experienced at least one more severe harm in the last 12 months (Quigg, Bellis, Grey, et al. 2016).

In light of the evidence, CTMUHB has concerns regarding the potential for public nuisance at Re evolution, Bethesda Street.

Public Safety

The two biggest influences on alcohol consumption are price and availability. Restricting availability is an effective way of reducing alcohol related harm (NICE, 2010).

Research undertaken in Wales, reported that higher levels of alcohol availability were found to be associated with a 20-25% increased risk of emergency hospital admissions and a consequential increased burden to the NHS. Patterns of harm were not the same across Wales, as more deprived local authority areas have higher levels of poorer health caused by alcohol and more violent crime (Fone et al. 2016).

Recommendations

Conscientious adherence to the four Licensing Objectives by Licensees is crucial if Cwm Taf Morgannwg is to collectively address alcohol related harm in our towns and communities.

In addition to the recommendations made by other Responsible Authorities, CTMUHB would suggest that:

- The provision of a licence is reconsidered.

References

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Fone, D. et al (2016). Change in alcohol outlet density and alcohol-related harm to population health (CHALICE): a comprehensive record-linked database study in Wales. Public Health Research Volume: 4 Issue: 3 <http://www.journalslibrary.nihr.ac.uk/phr/volume-4/issue-3#plain-english-summary>

Jewell, T., (2010). *You, your child and alcohol: Guidance on the consumption of alcohol by children and young people*, Cardiff: Welsh Government.

National Institute of Health and Care Excellence (2010: PH24). Alcohol-use disorders: prevention. Accessed from: <https://www.nice.org.uk/guidance/ph24>

Newbury-Birch, D. et al., (2009). *The impact of alcohol consumption on young people: A Systematic review of published reviews*, Newcastle: Department for Children, Schools and Families.

Public Health Wales Observatory (2019). *Alcohol in Wales*. [Online] Available at: <https://publichealthwales.shinyapps.io/AlcoholinWales/> [Accessed 02 07 2019]

Quigg Z, Bellis M., Greya H., Ashtonb, K., Hughes. K.,& Webster, J (2016). *Alcohol's harms to others: the harms from other people's alcohol consumption in Wales*. Accessed from: <http://howis.wales.nhs.uk/sitesplus/documents/888/PHW%20Harms%20to%20Others%20Report%20%28final%29.pdf>

Welsh Government, (2019). *Health Behaviour of School Aged Children*. Accessed from: http://www.shrn.org.uk/wp-content/uploads/2019/05/SHRN-HBSC-NR_31.05.2019.pdf