

***Submission on  
Ireland 2040:  
Our Plan***

***The National  
Planning  
Framework***



**THE ALCOHOL FORUM**

## Background Details

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**Submission on:** Ireland 2040 Our Plan

**For the attention of:** Forward Planning Section, Department of Housing, Planning, Community & Local Government

**Prepared by:** The Alcohol Forum

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## Introduction

Alcohol plays many roles in contemporary Irish society – as a relaxant, as an accompaniment to socializing and celebration, as a source of employment and exports and as a generator of tax revenue. It is likely that alcohol consumption will remain a feature of life in Ireland, with both its welcome and unwelcome consequences. In reducing harm, it is important to note that evidence based measures implemented to reduce alcohol related harm do little to prevent the occasional social drinker from enjoying the benefits associated with alcohol. What these measures do prevent, however, is the cascading and intergenerational harm highly correlated with the over-availability of an addictive substance.

Eighty-eight people die as a result of alcohol harm in Ireland every month, with alcohol being a factor in over 50% of suicides, 33% of all road fatalities and as the cause of one in four deaths of young males aged 15 -39. The issue of alcohol harm underpins myriad social, economic and health problems in Irish society. Despite the widespread harm to individuals, families and communities; the potential of integrated planning to reduce alcohol harm has not been reflected in national policy documents to date.

‘Ireland 2040 – Our Plan’ will provide a framework for the development of secure sustained, long-term and regionally balanced progress on social, economic and environmental fronts in Ireland. The development of the plan provides an important opportunity to consider how this framework could contribute, in a meaningful way, to reducing the negative social, community and health impacts of harmful alcohol use in Ireland.

It is at the community level that the negative consequences of alcohol harm are most keenly felt. Local Community Development Committees, whether in large urban areas or covering more rural counties, are faced with the challenge of supporting their communities to prevent and reduce harm from alcohol. Alcohol harm is a barrier to improving the quality of life and well-being of communities across Ireland. The WHO Global Strategy on Alcohol recommends wide intersectoral engagement in addressing harm from alcohol.

The DECLG Guidelines on the community objectives of LECP plans (2015) state that LECP plans should be aimed at ‘enhancing the quality of life and well – being of communities in a manner consistent with the overall regional and local planning framework’.

Planning a response to alcohol harm in an integrated way incorporating measures across the built, social, economic and natural environments will mean available resources are used to greatest effect to influence the supply and demand factors and achieve improved health and well-being outcomes. There is no one solution for all communities and each LCDC will need to work with communities to establish what is needed and what will work locally.

## **About the Alcohol Forum**

The Alcohol Forum is a national charity dedicated to preventing and reducing the physical, psychological and social harms caused by alcohol misuse. Established in the North West ten years ago, the Alcohol Forum delivers a diverse range of programmes and has developed expertise in a range of areas including community action on alcohol, alcohol related brain injury, family support, policy, advocacy and education.

### **Our Mission**

To inspire change by working with families and communities to prevent and reduce the harm caused by alcohol.

### **Our Vision**

An Ireland where every child, family and community is free from the harmful effects of alcohol.

### **Our Strategic Priorities**

Our team provide support, resources and expertise to:

- Build capacity within families and communities to respond to alcohol harms
- Support families and individuals through evidence based interventions
- Provide education and training to prevent and respond to alcohol harms
- Reduce alcohol consumption

### **Our Five Core Values That Inform Everything We Do**

### **Collaboration**

We believe change is possible by working alongside families, communities and other organisations. We build strong partnerships by listening to others and sharing ideas, experiences and opportunities to achieve our goals.

### **Excellence**

We are committed to developing our knowledge and innovating to achieve improvements. We are committed to sharing our expertise, leading by example and empowering others to make positive change.

### **Respect**

The way we treat each other in achieving our objectives is just as important as what we achieve. We value the experiences, ideas and strengths that each person brings. We are committed to good governance and integrity and demonstrate this with the people we work with, our volunteers, our partners and those who support us.

### **Independence**

For us, independence does not mean doing our own thing, it means having the strength and commitment to do the right thing free from undue influence or pressure.

### **Caring**

The needs of the children, families, individuals and communities we serve are at the centre of what we do. We strive to create an environment where everyone feels supported to reach his or her full potential.

## **Recommendations in Relation to the Development of a National Planning Framework**

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**Recommendation 1: We recommend the mainstreaming of the County Alcohol Profiling project at a national level over the life time of the National Planning Framework.**

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In 2016 the Alcohol Forum, selected clinical services and the Public Health Department, HSE NW and HSE W, collaborated on an exercise to scope the availability of data to describe alcohol-related harm in Ireland. The intention was to identify quality assured databases that provided data at county level to allow the development of a County Alcohol Harm profile for each county in Ireland. The purpose of the profile was to provide a baseline from which trends could be measured, inform local actions on alcohol, particularly with the new LCDC structures and LECs, and to inform service planning.

By the end of Qtr 1.2017, County Alcohol Profiles will be completed for the nine counties in HSE W and HSE NW; which includes, Donegal, Sligo, Leitrim, Cavan, Monaghan, Galway, Roscommon and Mayo. These profiles will provide an important tool for a range of organisations and structures operating at the County level. We recommend that the work of the County Profiling Group established by the Alcohol Forum is replicated at a national level and the work is developed in such a manner to support consistency and comparability over time. The impetus for the Alcohol Forum in initiating the County Alcohol Profiling Project was to support the development of a consistent approach to the collection and presentation of data at a County level which would provide important baseline information around which progress on reducing harm from alcohol could be measured across time and which allowed for comparisons between Counties to be made and understood as a policy and planning tool.

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**Recommendation 2: We recommend that reducing alcohol harm is included as a high level and overarching objective within the proposed national planning framework.**

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### Planning Policy Hierarchy, Ireland 2017



The importance of integrated planning in Ireland has never been more evident. Alcohol is a multi-dimensional and complex issue that concerns the health and well-being of individuals and communities. Within the proposed policy planning hierarchy, we propose that the inclusion of reducing alcohol harm be included as a high level strategic objective. This would ensure that as detailed proposals are developed to support and improve the quality of life for people living in Ireland that reducing alcohol harm is acknowledged and adopted as a goal.

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**Recommendation 3: In areas where community action on alcohol groups exist, we recommend inclusion of this work in the relevant Local Economic and Community Plans.**

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In areas where Community Action on Alcohol has been initiated, local Community Action plans which require inter-sectoral collaboration have been developed. While many of these include actions which will require leadership and implementation by public sector bodies, including Local Authorities, this work has, to date, depended on the development of partnerships at the local level. We recommend that the National Planning Framework includes reference to the work of these groups and articulates the need for the work to be reflected in the plans of LCDC's operating at the County level.

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**Recommendation 4: We recommend that the National Planning Framework addresses the issue of alcohol availability through review and updating the planning making processes at the local, regional and national levels**

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Comprehensive reviews of alcohol policy interventions show that addressing alcohol availability is a central component of any successful approach to reducing alcohol-related harm (WHO, 2006). There are many aspects of national, regional and local planning processes that are of relevance to the policy goal to reduce harmful alcohol consumption and alcohol-related harm. This is particularly true in terms of the planning of the retail environment with regards to the sale and supply of alcohol. In particular, decisions made at national, regional and local planning level regarding the granting of licences for the sale of alcohol and the hours of sale are important.

Over the past decade the retail of alcohol has changed substantially with an increase in the overall number of retail units, a shift from on-sales to off-sales and the emergence of supermarkets as major players with regard to the retail of alcohol (Dept of Health, 2013). The drinking context and patterns of alcohol consumption in Ireland have changed dramatically over the past two decades with most recent figures indicating that 62% of all alcohol consumed is now purchased in the off-trade sector. Alcohol is widely available and highly visible in communities. It is cheap to purchase in the off-trade sector, where since the removal of the groceries order in 2006, it can be sold below cost price in the large supermarket chains. Between 1998 and 2013, wine and spirit off licenses increased by 377% (from 1,072 licenses to 5,116 licenses). Since, 2013 the off license share of the market has continued to grow from a market share representing 58% of consumption in 2013, to a market share representing 62% of consumption in 2015.

Relaxed licensing regulations with respect to the off trade sector and the wide availability of cheap alcohol have all contributed to increased consumption in the home which presents more complex concerns in respect to enforcement of age verification and also to the risks to children of a range of hidden harms.

There is fairly consistent evidence that increased alcohol outlet density is associated with increased: adult alcohol consumption, adolescent alcohol consumption, mortality and

hospitalizations, crime, domestic violence and child abuse (Popova et al, 2008; Broe, 2014; Livingston, 2008; Remer, 2006; Makela, 2002 and Gruenewald, 2006).

Revenue produces a register of liquor licences annually. This details sales outlets in both the on-licence and off-licence sector. This data should be taken into account in relation to rational planning for reducing alcohol-related harms at both individual and community levels (NSAPAG, 2015). The CHALICE study in Wales assessed the effect of change in outlet density between 2005–09 and demonstrates the potential of the data to monitor the impact of licencing patterns over time (Fone, 2012).

Of particular concern is that when there are areas of very high alcohol-outlet density, these tend to compete on price, further enhancing the availability and accessibility of alcohol in the local area and contributing to ‘urban decay’. There is some evidence that urban regeneration in disadvantaged areas has been undermined by the tendency to fill commercial spaces with alcohol outlets selling cheap alcohol, despite the objections of local residents and communities (NSAPAG, 2015). One of the projects currently being undertaken by the National Community Action on Alcohol Network is the development of a Community Guide on Alcohol Licensing which is being developed with the support of the Public Interest Law Alliance. This work has been developed in direct response to the concerns of communities to the widespread availability of alcohol and the difficulties that communities have had in limiting the number of retailers selling alcohol.

In light of the available evidence, the National Community Action on Alcohol Network recommends that the National Planning Framework commits to playing its part in achieving the goals of government policy on reducing alcohol-related harm through:

- Acknowledging the evidence demonstrating the negative impact that excess alcohol consumption is having on both the safety and enjoyment of public spaces in Ireland
- Acknowledge the evidence on the impact that local planning can have on reducing alcohol-related harms particularly with regard to alcohol licensing decisions
- Devise and commit to the implementation of appropriate actions to reduce alcohol-related harms through best practice in evidence-based local planning. This could include:

Guidance on the mix, type, concentration and management of licensed premises in local area plans including in 'entertainment and night-life' areas and in areas undergoing regeneration.

A commitment to work with a range of stakeholders to assess the cumulative impact of licensed premises, in particular in socio-economically disadvantaged communities.

Guidance on planning for enhanced community safety in relation to high alcohol-outlet density areas with a focus on accessible late-night/early morning transport, noise pollution and public toilets.

- Commit to explore further structured engagement with stakeholders working in the field of alcohol harm reduction, in particular local drug and alcohol task forces and community action on alcohol groups operating at the local level.