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Eric Anderson
Solicitor
Legal and Democratic Services
Corporate Governance
Aberdeen City Council
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Dear Mr Anderson

**Licensing (Scotland) Act 2005 – Application for the variation of a Premises Licence
Park Street Mini Store, 50 Summerfield Terrace, Aberdeen, AB24 5JD**

I refer to the above application and in terms of Section 22(1)(a) of the Licensing (Scotland) Act 2005, I make the following objection under the licensing objective:

Protecting and Improving Public Health.

The applicant seeks to increase the **capacity** of the premises off-sales provision at 50 Summerfield Terrace, Aberdeen, from 5.9m² to 9.94m². This equates to an approximate increase of 68% to the existing off-sales capacity. NHS Grampian wish to make an objection based on the **increased availability** of alcohol in an area of over provision.

The objection will focus on the following points:

1. Evidence with regard to overprovision and capacity of premises
2. Hospital admission rates for wholly attributable alcohol-related conditions

1. Evidence with regard to overprovision and capacity of premises

During the development of the 2013 – 2016 Statement of Licensing Policy, NHS Grampian provided a range of evidence that helped Aberdeen City Licensing Board identify the whole city, with the exclusion of two localities, as being overprovided for in respect of off sales premises.

It is stated in the Statement of Licensing Policy, Paragraph 9.8 that:

*“The Board, having regard to the number and **capacity** of liquor licensed premises in this locality and, with the supporting evidence provided by consultees, adopted this locality as having an overprovision of liquor licensed premises for off sales”*

There is a strong relationship between the availability of alcohol leading to overconsumption resulting in health harm. We have a specific concern about the request to increase the alcohol display area as this is highly likely to mean an increase in stock held and therefore in alcohol promoted and sold.

2. Hospital admission rates for wholly attributable alcohol-related conditions

In Aberdeen the average alcohol related hospitalisation rate is 31% higher than the Scottish average¹.

Information from Scottish Public Health Observatory can be broken down to post code sector. The post code sector AB24 5 record alcohol related / attributable hospital patient admissions to be **more than 5% worse than the Scottish average** and are coded Red in the most recent edition of the Traffic Lights Health & Wellbeing Profiles (2012)².

When there are already higher than average rates for hospital admissions in a local area, NHS Grampian is of the opinion that any increase in display area for alcohol will result in additional availability, increased consumption and resultant health harm. It is recognised that increased marketing and display of products leads to increased purchasing and consumption and we have no reason to believe this is any different for alcohol.

For these reasons, and in terms of Section 22(1)(a) of the Licensing (Scotland) Act 2005, the Public Health Directorate of NHS Grampian objects to the increased off-sales capacity requested as the granting of it would be inconsistent with one or more of the licensing objectives, namely Protecting and Improving Public Health.

Yours sincerely

Christopher Littlejohn
Consultant in Public Health

pp Heather Wilson
Health Improvement Officer (Alcohol & Drugs)

¹ <http://www.alcohol-focus-scotland.org.uk/media/61723/Outlet-density-and-harm-Aberdeen-City.pdf>

² <http://www.nhsgrampian.org/grampianfoi/files/TrafficLights2012AberdeenCity.pdf>

