

Date 20th May 2016
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Our Ref 20161031
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Ms Ruth O'Hare
Solicitor
Legal and Democratic Services
Corporate Governance
Aberdeen City Council
Business Hub 6, Level 1 South,
Marischal College, Broad Street
Aberdeen AB10 1AB

Dear Ms O'Hare

**Licensing (Scotland) Act 2005 – Application for a Premises Licence
Dobry Mini Market, 75 Victoria Road, Aberdeen, AB11 9LT**

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 apply for a premises licence for the property at 75 Victoria Road, Torry, Aberdeen, AB11 9TL.

This objection will focus on the following points:

1. Scottish Public Health Observatory data
2. Referrals to Integrated Alcohol Service
3. Hospital admission rates for wholly attributable alcohol- related conditions.
4. GP Alcohol Brief Intervention
5. Distance between existing off sales premises in the area.

1. Scottish Public Health Observatory data

Alcohol related deaths and alcohol related hospital admissions are both recorded as red in the Scottish Public Health Observatory (ScotPHO) profiles indicating that they are higher than the Scottish average¹.

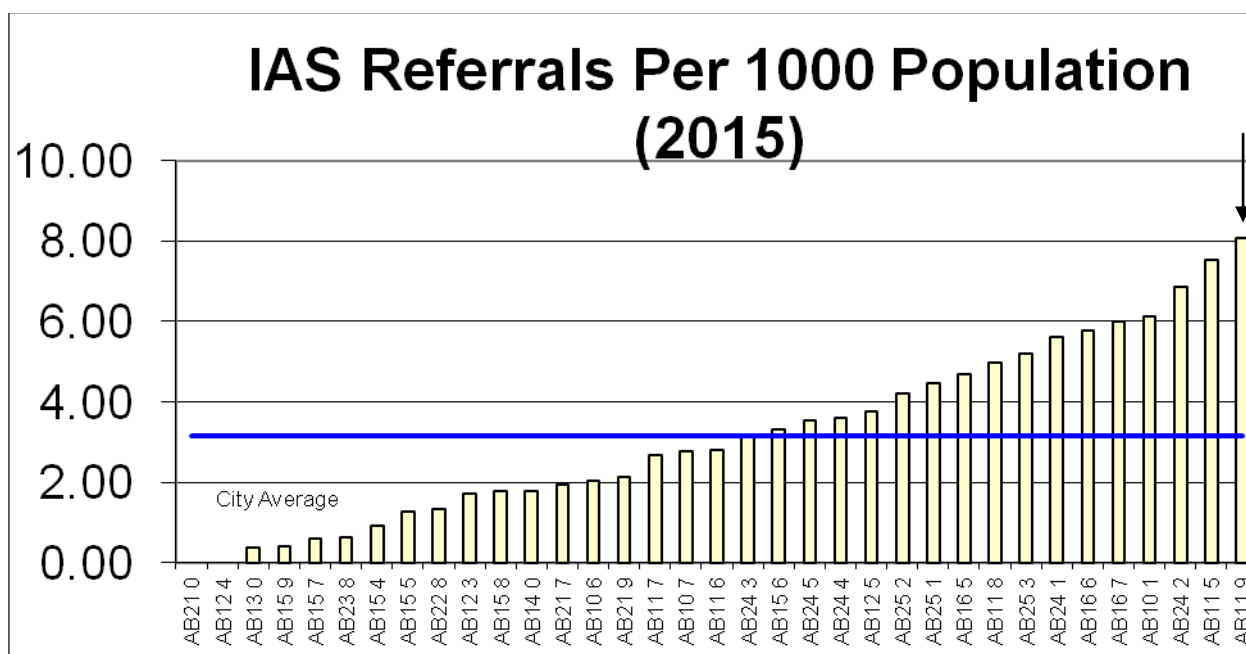
Premature deaths from cancer in Torry are recorded as red in the ScotPHO profiles indicating that they are higher than the Scottish average¹. Harmful alcohol consumption is one of the top three most preventable causes of cancer².

Premature deaths from coronary heart disease in Torry are recorded as red in the ScotPHO profiles¹. Regularly drinking alcohol raises blood pressure and significantly increases the chance of people developing heart disease in the future².

ScotPHO Mental health indicators are also recorded as red¹. Depression is one of the most common mental health problems in the UK – experienced by as many as one in ten people in any year and it shares a complex, mutually re-inforcing relationship with excessive alcohol consumption. This means regardless of whether heavy alcohol consumption or mental health issues came first, having one condition makes it significantly more likely the other will develop.

2. Referrals to the Integrated Alcohol Service, Aberdeen

Referrals from this area to the Integrated Alcohol Service at Cornhill Hospital were recorded as the highest from any post code sector in Aberdeen during the period from 1st January 2015 – 31 December 2015.



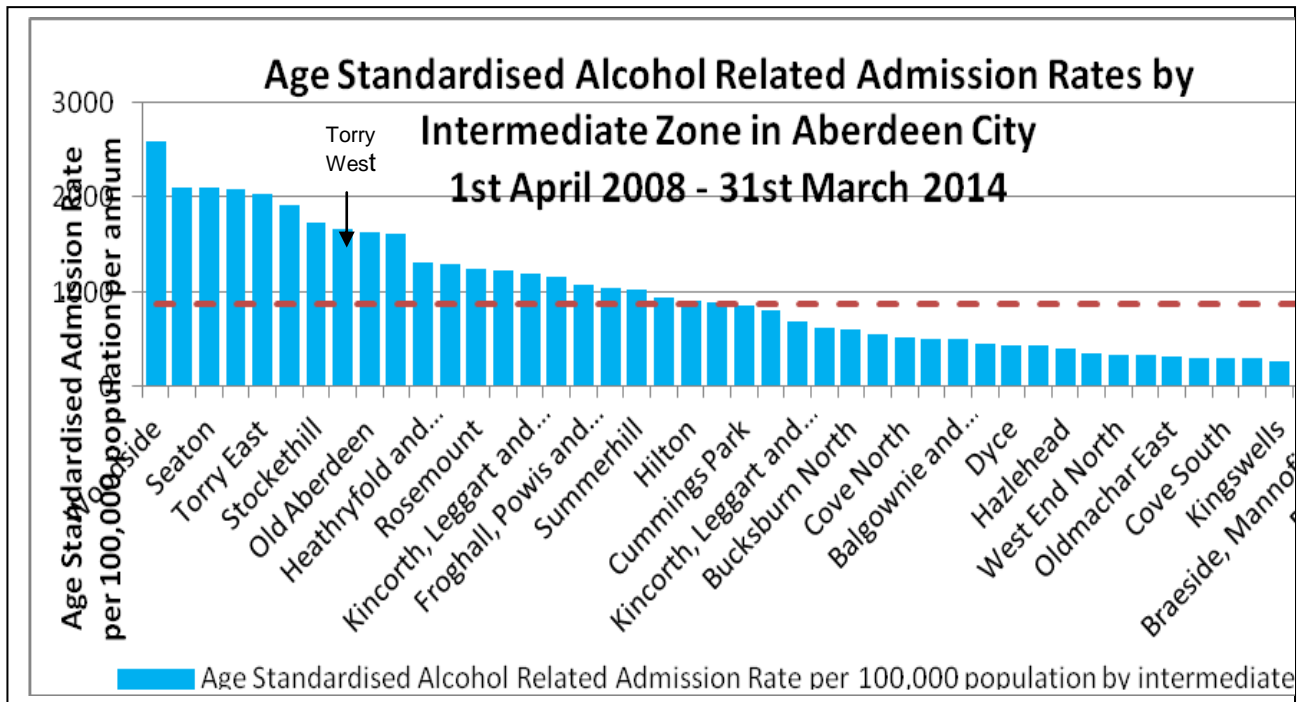
¹ http://www.nhsgrampian.org/grampianfoi/files/ABERDEENCITYTraffic_Lights_Pack_2016.pdf

² <http://www.alcoholconcern.org.uk/help-and-advice-/help-and-advice-with-your-drinking/health-factsheets/>

Even small reductions in the availability of alcohol can contribute to health gain and reduce violence and harm to the population generally, as well as to the drinker themselves.

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

Trends in wholly-attributable alcohol-related hospital admissions in Grampian have been generally consistent with those seen nationally. Following a decade of rising admission rates, there has been a reduction in recent years. However, Aberdeen City's admission rate remains significantly higher than Aberdeenshire or Moray.



In 2014/15, in Aberdeen, there were 51 deaths and 1533 hospital stays as a result of alcohol of which 86% were emergency admissions. As you can see in the excerpt above the Torry East and West areas are showing high rates of admission and are ranked as 5th and 8th highest respectively.

4. GP Alcohol Brief Interventions (ABIs)

Most people who are experiencing health problems as a result of alcohol will be seen at their local GP practice and not require hospital admission. Alcohol brief interventions are a way for GPs to address health problems caused or made worse by alcohol. They are intended for the general population who do not have a recognised alcohol related problem. Between April 2015 – March 2016 Torry Medical Practice identified 160 individuals with problematic alcohol use.

5. Distance between existing off sales premises in the area.

Within the immediate vicinity of this store there are 6 off-sales premises with one immediately next door and 3 of these stores already selling alcohol imported from Eastern Europe. See table below.

Address	Distance from Binar Ltd	Walking time from Binar Ltd
53 Victoria Road **	Less than 0.01 kilometres	23 seconds
67/69 Victoria Road ** & *	Less than 0.01 kilometres	10 seconds
78 Victoria Road **	less than 0.01 kilometres	18 seconds
94 Victoria Road * & **	Less than 0.01 kilometres	48 seconds
78 Menzies Road *	0.483 kilometres	6 minutes
225 Victoria Road **	0.804 kilometres	8 minutes

* denotes store selling a **range** of Eastern European alcohol.

** denotes stores open from 10am until 10pm including Sundays

From the point of view of a person with an alcohol problem or someone recovering from an alcohol problem this is a very unhealthy neighbourhood providing no respite from alcohol whilst they go about their everyday business.

Research published on the 7th October 2014 has strengthened the relationship between off sales density and greater alcohol related deaths. This research identified that neighbourhoods in Scotland with the most licensed premises have alcohol related death rates more than double those in neighbourhoods with the fewest licensed premises. One of the key findings from this research is that each increase in outlet availability was associated with a higher alcohol-related death rate.³

There is a strong relationship between the availability of alcohol leading to over consumption resulting in health harm. Availability of alcohol not only pertains to access but also to price. Having premises in close proximity may result in competitive pricing thus making alcohol more available in terms of cost. Competitive pricing is more likely in small independent shops where autonomy for pricing is at the discretion of the management.

The Board will be aware that the majority of alcohol is bought from off-sales alcohol outlets where the alcohol is cheaper than purchasing from on-sales. Drinking within a domestic setting can increase the risks of alcohol-related harms and excessive consumption, leading to health harm.

³ <http://www.alcohol-focus-scotland.org.uk/media/89684/cresh-research-alcohol-outlets-and-health.pdf>

On the basis of the high level of health harm and close proximity of numerous other premises all operating similar business models, regardless of the size of the alcohol display, we feel that Torry has sufficient provision of alcohol. I would suggest that the license is not granted.

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 application as the granting of it would be inconsistent with one or more of the licensing objectives, namely Protecting and Improving Public Health.

Yours sincerely

Dr Tara Shivaji
Consultant in Public Health

Heather Wilson
Health Improvement Officer (Alcohol & Drugs)