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Enquiries to 01224 557047
Our Ref 20161031
Email: grampian.phalcohollicensing@nhs.net

Eric Anderson
Solicitor
Legal and Democratic Services
Corporate Governance
Aberdeen City Council
Business Hub 6, Level 1 South,
Marischal College, Broad Street
Aberdeen AB10 1AB

Dear Mr Anderson

**Licensing (Scotland) Act 2005 – Application for a Premises Licence
Donside Stores, 1 Donside Street, Aberdeen, AB24 2PJ**

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 is seeking a premises license for a new licensed store at 1 Donside Street, Aberdeen, AB24 2PJ.

This objection will focus on the health of the communities living in the AB24 2 postcode sector as we believe that they form the target customer group for the Donside Stores. The AB24 2 postcode sector includes the neighbourhoods of Tillydrone, Old Aberdeen & Woodside. We will address the following points:

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

1. 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. The absolute numbers of people admitted to hospital each year as a result of alcohol rose since the late 1990s and in recent years, has fallen slightly. This fall largely accounted for by young adults being admitted because they are intoxicated after a one off heavy drinking episode which was the most common

cause of hospital admission. The decrease in admissions of intoxicated young adults hid the fact that over the same period, the number of middle aged and older people admitted to hospital with chronic health conditions caused by exceeding sensible drinking guidelines over weeks, months and years has increased. The change in patterns of harms are compatible with the context of people purchasing alcohol from off sales to drink at home and regularly exceeding recommended sensible drinking limits. The types of chronic health harms include liver cirrhosis, pancreatitis and alcoholic gastritis. How much alcohol and how often it needs to be drunk to cause this type of long term damage vary from person to person. As many as a third of people with liver cirrhosis do not have alcohol dependency¹. In 2014/15, there were 51 deaths and 1533 hospital stays as a result of alcohol of which 86% were emergency admissions. The highest rate of alcohol related hospital admissions between 2008 and 2014 was recorded in Woodside, the fourth highest rate was recorded in Tillydrone and the 9th highest rate recorded in Old Aberdeen.

2. Scottish Public Health Observatory data

The highest rates of alcohol related hospital admissions in Aberdeen city in 2014/15 was recorded in the Old Aberdeen area. The third highest rate was recorded in Woodside and the fifth highest rate recorded in Tillydrone. Rates of alcohol related hospital admission from these areas are up to three times in excess of the Scottish average and all three areas are recorded as red on the traffic light profile for the city.

The third and fifth highest death rates from alcohol related conditions are recorded in the Woodside and Tillydrone area. All three areas are coded red for the rates of alcohol related deaths in the traffic light health profiles².

Harmful alcohol consumption is the third most common preventable cause of cancer in the UK³. The number of patients diagnosed and living with cancer in Tillydrone and Old Aberdeen is recorded as red in the traffic light profiles. The rates of people dying of cancer before their 75th birthday are much higher than the Scottish average and recorded as red in the traffic light health profile in all three areas of Tillydrone, Old Aberdeen and Woodside². We believe alcohol is an important contributor to the high rates of cancer and of premature death.

Regularly drinking alcohol raises blood pressure and significantly increases the chance of people developing heart disease in the future³. Premature deaths from coronary heart disease for Tillydrone, Woodside and Old Aberdeen are also much higher than Scottish average rates and recorded as red in the traffic light health profiles².

1. Depression shares a complex, mutually reinforcing relationship with excessive alcohol consumption. Regardless of whether heavy alcohol consumption or mental health issues came first, having one condition increases the chances of developing and likely complexity of the other. The rates of people admitted to hospital because of a severe mental illness and rates of suicide in Tillydrone, Old Aberdeen and Woodside are recorded as red in the traffic light health profiles⁴.

¹ <https://www.drinkaware.co.uk/alcohol-facts/health-effects-of-alcohol/effects-on-the-body/alcohol-and-liver-disease/>

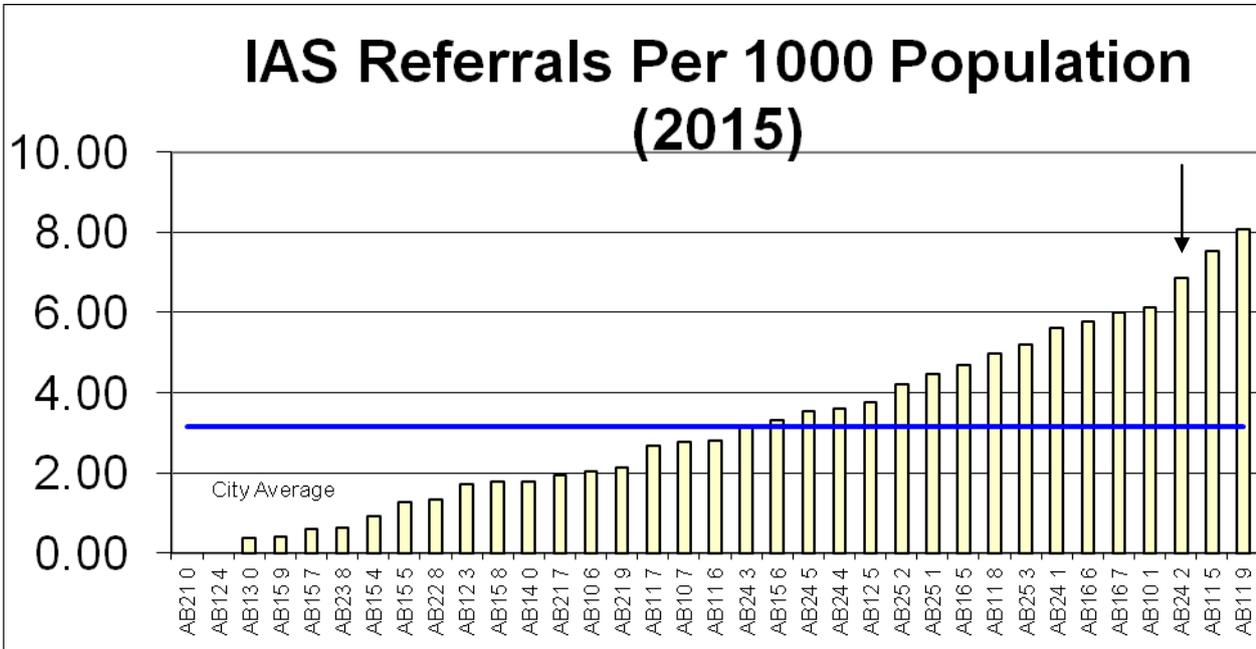
² http://www.nhsgrampian.org/grampianfoi/files/ABERDEENCITYTraffic_Lights_Pack_2016.pdf

³ <http://www.alcoholconcern.org.uk/help-and-advice-/help-and-advice-with-your-drinking/health-factsheets/>

⁴ http://www.nhsgrampian.org/grampianfoi/files/ABERDEENCITYTraffic_Lights_Pack_2016.pdf

3. Referrals to the Integrated Alcohol Service for the treatment of alcohol dependence in Aberdeen

Rates of referral from the local area to the Integrated Alcohol Service (IAS) at Cornhill Hospital are above the city average. In 2015, the AB24 2 area had the third highest referral rate for alcohol dependency in the city.



4. GP Alcohol Brief Interventions (ABIs)

The majority of people who are experiencing common alcohol related health tend to be seen at their local GP practice rather than be admitted to hospital. Alcohol brief interventions are a way for GPs to address alcohol related health problems in people who do not have alcohol dependence. In 2014/15 Woodside Medical Practice identified 159 people whose relationship with alcohol on was having a negative effect on their health. None of these people were dependent on alcohol.

5. Distance between existing off sales premises in the area

There are already 2 small supermarkets/convenience stores selling alcohol within an 7 – 8 minute walk from Donside Stores on Hayton Road.

The fact that there are already two similar types of premises within close walking distance of Donside Stores leads us to conclude that granting this application would result in an increase in the availability and accessibility to alcohol in the area as a whole. We are of the opinion that Tillydrone, Woodside and Old Aberdeen, areas from which the Donside Stores would draw some of its customers, already demonstrate exceptionally high levels of alcohol related health harm compared to the rest of the city.

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 the licensing objective of Protecting and Improving Public Health.

Yours sincerely

Dr Tara Shivaji
Consultant in Public Health

Heather Wilson
Health Improvement Officer (Alcohol & Drugs)