

Date 20th October 2016
Enquiries to 01224 557047
Our Ref 20161151
Email: grampian.phalcohollicensing@nhs.net

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

Dear Sir/Madam

**Licensing (Scotland) Act 2005 – Application for a Provisional Premises Licence
Marks & Spencer Simply Food, Stoneywood Park, Dyce, Aberdeen, AB21 9LA**

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 has requested a provisional premises licence for a new Marks & Spencer Simply Food store at Stoneywood Park, Dyce, Aberdeen with an off-sales capacity of 37.2m² and a seated cafe area for 48 persons with on-sales facilities.

The NHS Grampian objection will focus on the following area:

1. Store location and existing provision
2. Survey data for city residents
3. Hospital admission rates for wholly attributable alcohol related conditions
4. Alcohol related death rates

1. Store Location and existing provision

This store is situated within the newly developed Stoneywood Estate which provides approximately 500 new homes. Within the development plans for this estate it was identified that support services, which includes retail provision, would be provided to this new neighbourhood. We welcome the inclusion of services to this new estate but question if the inclusion of services should include alcohol. In documents posted on-line examples

of services to be provided include a convenience store and coffee shop.

The Stoneywood Estate now has a convenience store which was granted a licence in September 2014 and opened for trading the following year. This store has an off-sales capacity of 34.69m² and is immediately opposite the site of the Marks & Spencer Simply Food Store.

2. Survey data for city residents

In a mapping exercise carried out by NHS Grampian in October 2015 it was established that 96% of Aberdeen City Council residents live within 1000 metres of off-sales premises. This map shows that people in the area already have good provision and generally have access to off-sales within a 20 minute walk or 5 minute drive. See appendix 1 for details.

A City Voice survey of Aberdeen City residents in 2015 identified that 77% of respondents felt that the number of places they had available to them in order to buy alcohol in their local area was "*About right*" with 10% thinking that they had "*Too many*" and 2.5% "*Too few*"¹. It is interesting to note that only 2.5% of the City Voice respondents felt they had "Too few" off-sales licensed premises.

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

Since 1997, a five fold increase in the rates of hospital stays as a result of the harmful use of alcohol has been recorded for Aberdeen City Council residents. This category includes conditions such as alcohol induced irritation of the stomach, chronic disease of the heart muscle due to alcohol, mental and behavioural disorder that occur as a result of alcohol (such as depression, anxiety etc). Over this time period, there has been a steady increase in the number of admissions due to alcoholic liver disease. Alcohol admissions occur from all parts of the city, rich and poor.

The Scottish Public Health Observatory (ScotPHO) Health & Wellbeing Profiles for Aberdeen City identify Alcohol related hospital stays as being "statistically significantly "worse" than the National average².

The harm that I would expect to see in the future as a result of alcohol, using evidence from the Chief Medical Officers (CMOs) for the UK report, would be more cancer, heart disease and strokes as well as impact on mental health and wellbeing³.

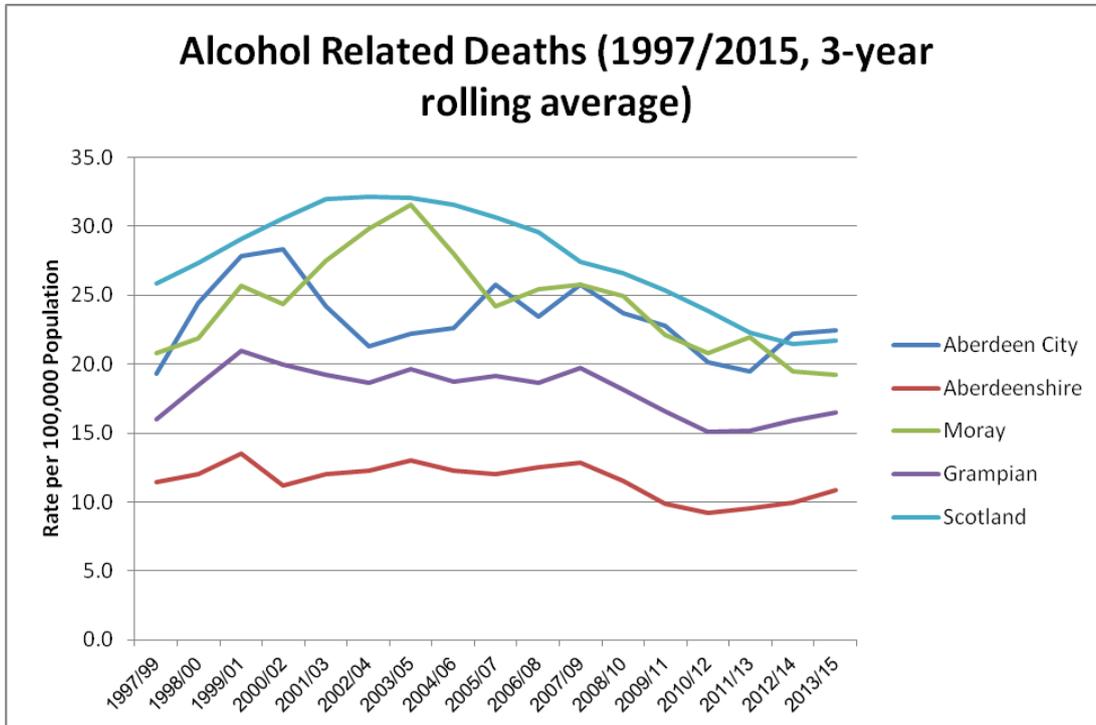
¹ <http://communityplanningaberdeen.org.uk/cityvoice/wp-content/uploads/2014/06/35th-City-Voice-Report.pdf>

² <https://scotpho.nhs.uk/scotpho/homeAction.do>

³ https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/545911/GovResponse2.pdf

4. Comparison of alcohol related death rates.

The graph below illustrates death rates as reported by ScotPHO⁴ using GROS data (General Register Office for Scotland). Aberdeen City's rate has remained essentially stable, in contrast to Scotland's falling rate.



The chart above illustrates the three year rolling average for alcohol related deaths based on the rate per 100,000 population with the most recent period shown being 2013/15. The Aberdeen city rate is currently higher than the Scottish average.

Alcohol related death in Scotland is still among the highest in Western and Central Europe.

Based on the evidence provided in this letter I would suggest that the introduction of a new off-sales licensed establishment within this area can only have a negative impact on the population's health.

Increased accessibility of alcohol leads to increased consumption. Whilst the residents of this estate may not fit the stereotypes of those addicted to alcohol, the CMO guidelines are clear that you do not have to be intoxicated and incapable to be harmed. Indeed it is the regular consumption of half or one bottle of wine a night that also causes harm. Data from the most recent Scottish Household Survey shows that the most affluent consume the most alcohol⁵.

⁴ <http://www.scotpho.org.uk/>

⁵ <http://www.gov.scot/Resource/0050/00505798.pdf>

The constant need to include alcohol in every aspect of life is creating a society where alcohol is normalised and accepted as an everyday purchase. I would stress that alcohol plays a major role in the causation of disability, disease and death and the economic benefits connected with the production, sale and use of this commodity come at an enormous cost to society. Whilst I welcome the addition of the Marks & Spencer Simply Food outlet I would request that the alcohol license for off and on sales 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

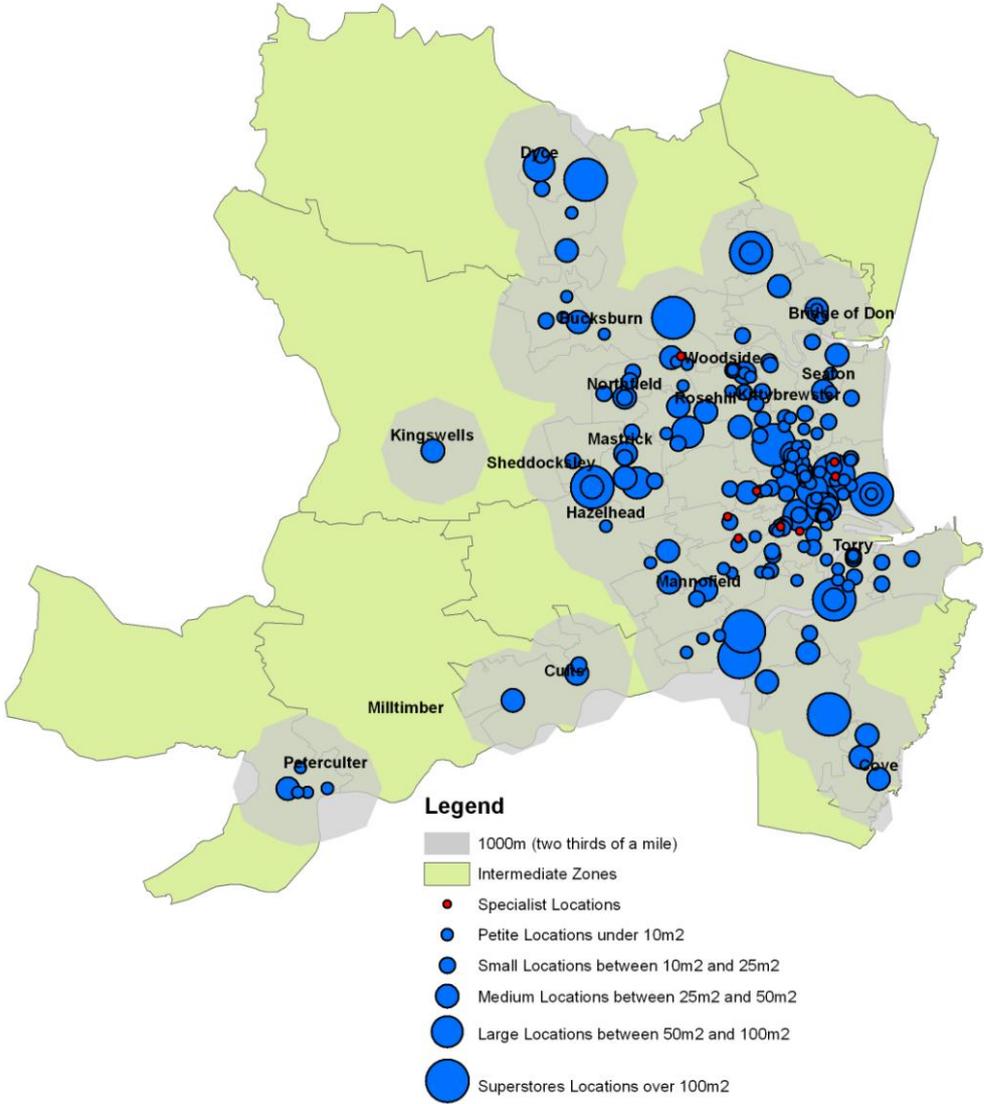
Dr Tara Shivaji
Consultant in Public Health

pp Heather Wilson
Health Improvement Officer (Alcohol & Drugs)

Appendix 1

Aberdeen City Alcohol Off Sales Licensed Premises (198)

as at September 2015
(1000m buffer)



Based on general practice registration of Aberdeen City residents at April 2015
 193,500 = 18 years and over population
 186,000 = 18 years and over live within 1000 metres of off-sales premises
 96% = percentage of residents live within 1000 metres of off-sales premises