

Date 22<sup>nd</sup> December 2016  
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Our Ref 20161175  
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Ms Arlene Dunbar  
Team Lead  
Legal and Democratic Services  
Corporate Governance  
Aberdeen City Council  
Business Hub 6, Level 1 South,  
Marischal College, Broad Street  
Aberdeen AB10 1AB

Dear Ms Dunbar

**Licensing (Scotland) Act 2005 – Application for a Provisional Premises Licence  
Unit A, Hillhead Halls of Residence, Aberdeen, AB24 1QWU**

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

**Protecting and Improving Public Health.**

Omar Retail Logistics has applied for a Provisional Premises License for the ground floor retail outlet within Hillhead Halls of Residence. The premises will be open from 07:00 till 24:00 Monday to Sunday for the provision of non-alcoholic goods, groceries, newspapers etc, with alcohol available 10:00 to 22:00 Monday to Sunday.

The local shop was previously located in a stand alone building adjacent to Hillhead Halls of Residence and had an alcohol capacity of 16.94m<sup>2</sup>. The new off-sales capacity for this premises has still to be confirmed but could be in the region of 32m<sup>2</sup>, an increase of 89% in total capacity. The shop is now relocated to within Hillhead Halls of Residence and has been operating for a number of weeks under occasional licenses.

Its location within the student village suggests that its main customer base will be students aged 17 and above. Hazardous alcohol consumption (most commonly binge drinking) is the most common public health issue affecting university students in the UK<sup>1</sup>, affecting up to 89% of young men and 77% of young women. Just under a third of students identified themselves as “problem drinking”. These levels of consumption are extremely concerning to parents of young people going away to university as well as to staff and students tasked with improving student health and well-being. Aberdeen University recognise that they

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<sup>1</sup> <https://bmcpublichealth.biomedcentral.com/articles/10.1186/s12889-016-2843-1>

are no different from other universities in terms of alcohol problems and have signed up to the National Union of Students "Alcohol Impact Programme".

The health of university students is poorer than that of their non student peers. Emotional health is more of a problem than physical health with worries about finances and study pressures contributing to increased levels of anxiety<sup>2</sup>. Alcohol could be seen by a minority as an easily available coping mechanism, placing them at heightened risk of experiencing harm to their health.

At the SARN (Scottish Alcohol Research Network) meeting held on Tuesday 27th September 2016 at Robert Gordon University, commendable and innovative efforts to tackle binge drinking in the student population were described by the student presidents and welfare officers of Robert Gordon University. They described a typical night out for members of sports clubs. The consumption of alcohol in student flats, bought from local off-sales featured as a defining part of the evening. These heavy drinking episodes might be limited to groups of students on isolated occasions but they are still more common in university students than non students<sup>3</sup>. The harm that this type of drinking can cause can persist well into later life, recent research from Glasgow University shows that attending university is a risk factor for heavy drinking in middle and older age<sup>4</sup>.

We have a duty of care to young people to ensure their health and wellbeing and provide an environment that does not encourage them to consume more alcohol than they intended or to consume alcohol when they hadn't intended to.

The size of the alcohol display and its position in the shop has all been shown to encourage more alcohol purchasing than was originally intended. Marketing advice to retailers suggests maximising visual impact to encourage sales. Suggested means include placing alcohol at the end of an aisle, increasing the size and appeal of the alcohol display area<sup>5</sup>. The more alcohol that is purchased, the more is consumed.

Non drinking adolescents' exposure to in-store alcohol displays are significantly linked to their onset of alcohol consumption within 2 years<sup>6</sup>.

Whilst I accept that a local shop is an important amenity, I am of the opinion that it serves a population in whom hazardous alcohol consumption is already an important public health problem. It will also serve as a local amenity for young people under the age of 18 who may be living away from home for the first time. Whilst many young people may be emotionally mature and able to handle peer pressure and stress, others may not be so confident or so emotionally mature. It is therefore vitally important that this premises, a facility that they are likely to use on a regular basis, does not pose a risk to the health and wellbeing of our young people by directly or inadvertently encouraging them to purchase alcohol where they had not intended to do so.

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<sup>2</sup> Stewart-Brown, Sarah, et al. "The health of students in institutes of higher education: an important and neglected public health problem?." *Journal of Public Health* 22.4 (2000): 492-499.

<sup>3</sup> Webb, E., et al. "Alcohol and drug use in UK university students." *Lancet* 348 (1996): 922-25.

<sup>4</sup> Green, Michael J., et al. "Adolescent smoking and tertiary education: opposing pathways linking socio-economic background to alcohol consumption." *Addiction* (2016).

<sup>5</sup> Robertson H 2015 Evidence on alcohol point-of-sale (POS) position/placement in small independent shops and its influence on purchasing and consumption (available at [http://www.hi-netgrampian.org/wp-content/uploads/2015/12/CERGA-Off-sales-alcohol-promotion\\_18122015.pdf](http://www.hi-netgrampian.org/wp-content/uploads/2015/12/CERGA-Off-sales-alcohol-promotion_18122015.pdf))

<sup>6</sup> Institute of Alcohol Studies: Marketing and Alcohol Factsheet May 2013

To this end I would suggest that the off-sales capacity for the new store is restricted to match what was available in the previous premises.

To compliment this approach I would suggest that the following conditions are applied to the granting of this license:

1. That the premises stock and promote a range of “no” and “low” alcohol products.  
(see attached booklet for examples of products)
2. That the premises do not position alcohol at the front of the store or at the end of an aisle.

For these reasons, and in terms of Section 22(1) (a) of the Licensing (Scotland) Act 2005, the Public Health Directorate of NHS Grampian submits this letter of objection and representation 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

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Consultant in Public Health

Heather Wilson  
Health Improvement Officer (Alcohol & Drugs)

\*Hazardous drinking is quantified as a level of consumption above the sensible limit increasing the risk of harm