

Date 25<sup>th</sup> July 2017  
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Our Ref 201701080  
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Ms Jennifer Wilson  
Team Lead  
Legal and Democratic Services  
Corporate Governance  
Aberdeen City Council  
Business Hub 6, Level 1 South,  
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Aberdeen AB10 1AB

Dear Ms Wilson

**Licensing (Scotland) Act 2005 – Application for a Provisional Premises Licence  
Lidl Store, Inverurie Road, Bucksburn, Aberdeen, AB21 9LZ**

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

**Protecting and improving public health.**

This is a new Provisional Premises Licence as the licence in relation to the Lidl store previously on this site was surrendered. The applicant seeks the following:

- Capacity for off sales display which was previously 42.85m<sup>2</sup> to now be 47.61m<sup>2</sup> of “normal” trading capacity.
- Add additional seasonal alcohol display area during 1 December of each year to 2<sup>nd</sup> January of the following year, to cope with festive demand – this equates to an additional seasonal capacity area of 12.02m<sup>2</sup>.

The objection is focused on the request for additional seasonal alcohol capacity between 01 December to 02 January. The additional display capacity requested of 12.02m<sup>2</sup> is comparable to the capacity of some small newsagents and convenience stores. We feel that this request is equivalent to the provision of an additional licensed premises in the area for that period. We would ask that the Board consider the request in this context.

This application could provide a total alcohol capacity of 59.63m<sup>2</sup>. This represents an overall increased capacity of almost 40% for the new Lidl store. We welcome the return of this Lidl store to the Bucksburn area but we would question the requirement for such a large increase to the alcohol display area during these 33 days.

**Our objection is focussed on the following areas:**

- 1. Proximity of similar premises**
- 2. Capacity issues**
- 3. Increased marketing of alcohol**
- 4. Health concerns for Aberdeen citizens**

#### **1. Proximity of premises**

In section 27.4 of the statement of licensing policy, the Board acknowledges that

*“Increased access and availability to alcohol through increased numbers of premises and/or opening hours or decreased pricing is linked to increased consumption, which in turn potentially leads to increased harm...  
Alcohol availability is affected by outlet density, outlet distance”*

There are 8 existing licensed premises within this post code area which serve the local community.

<b>Store</b>	<b>Location</b>	<b>Capacity</b>
Co-op	Stoneywood Road, Aberdeen	34.69m2
Marks & Spencer	Stoneywood Park, Dyce, Aberdeen	37.2m2
Co-op	Sclattie Park, Bucksburn	19.6m2
DSG	177 Bankhead Road, Bucksburn	3.5m2
Scotmid	8 Sclattie Park, Bucksburn	16.42m2
Grocer's Shop	56 Auchmill Road, Bucksburn	7.020m2
Chalmers Bakery	77 Greenburn Drive, Bankhead	3.9m2
Charlies	97 Kepplehills Road, Bucksburn	103.210m2

These premises are open all year round and do not increase the size of the alcohol display between 01 December and 02 January. We do not see any justification for the provision of what would effectively be another premises in this area during this period.

#### **2. Capacity issues**

Section 4 of the Statement of Licensing Policy indicates that the Board

*“welcomes the powers given to it by the Act and intends to use those powers in a socially responsible way”*

The operating plan makes it clear that this additional display area is to help Lidl cope with festive demand. This is a commercial need that should be addressed by the store, e.g. employing more staff to re-stock shelves. We are concerned that granting this request would set a precedent for the expectation of additional display capacity. Replicated over many stores, this could significantly increase the amount of alcohol available for consumption in the city which in turn potentially leads to increased harm.

### 3. Increased marketing of alcohol

We are aware that special occasions, such as Christmas, herald the introduction of increased marketing of many products, including alcohol.

International evidence clearly indicates that increasing price, reducing availability and restricting marketing are amongst the most effective and cost-effective policy measures to reduce alcohol consumption and harm in a population<sup>1</sup>. They are identified as the 'three best buys' of alcohol policy by the World Health Organization<sup>2</sup>. The Scottish Government's alcohol strategy Changing Scotland's Relationship with Alcohol: A Framework for Action<sup>3</sup>, by giving the 'three best buys' central prominence, is internationally recognised as being one of the most forward-thinking and ambitious responses to alcohol-related harm. The price, availability and marketing of alcohol are intrinsically linked; for example, increased availability increases marketing opportunity and drives down price in a competitive business environment<sup>1</sup>.

We object to any increase in marketing of alcohol that is clearly aimed to increase sales and therefore lead to increased consumption. We are aware that 74% of alcohol is now purchased in off sales premises with drinking at home, in unregulated environments becoming more common<sup>4</sup>. We believe that most harm by drinking alcohol is caused by people drinking at home.

### 4. Health Concerns

The board are aware of the health harms associated with alcohol and have accepted and acknowledged the evidence submitted by NHS Grampian for the formation of the Statement of Licensing Policy 2013 – 2016.

Information from the Scottish Public Health Observatory (ScotPHO) can be broken down to post code sector. This postcode sector includes the data zone of Bucksburn South which covers 41.2% of the population. Health statistics for this data zone identify alcohol related hospital admissions, early deaths from coronary heart disease and emergency admissions to hospital to be more than 5% worse than the Scottish average<sup>5</sup>. Referral rates to the specialist integrated alcohol service for the treatment of alcohol dependence from the Bucksburn medical practice are above average for Aberdeen City and have remained largely steady, showing no reduction, since 2011.

Lidl is a well known store with broad market appeal. It is likely that its customers would be drawn from across the city.

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<sup>1</sup> Alcohol: no ordinary commodity (Second Edition). Babor T et al, 2010

<sup>2</sup> From Burden to "Best Buys": Reducing the Economic Impact of Non-Communicable Diseases in Low- and Middle-Income Countries. World Health Organization and World Economic Forum, 2011

<sup>3</sup> Changing Scotland's Relationship with Alcohol: A Framework for Action. Scottish Government, 2009

<sup>4</sup> <http://www.alcohol-focus-scotland.org.uk/media/222528/Alcohol-strategy-recommendations-Report.pdf>

<sup>5</sup> [http://www.nhsgrampian.org/nhsgrampian/gra\\_display\\_simple\\_index.jsp?pContentID=3146&p\\_applic=CCC&p\\_service=Content.show&](http://www.nhsgrampian.org/nhsgrampian/gra_display_simple_index.jsp?pContentID=3146&p_applic=CCC&p_service=Content.show&)

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 average<sup>6</sup>. Despite the fall in the rate of alcohol related hospital admissions since 2007, the numbers of people newly diagnosed with alcoholic liver disease almost doubled between 2007 and 2016.

The Board will also be aware that health harms are not solely related to the drinker but extend to impact on friends and family. Holiday periods are often a time of added stress for many families.

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. We would suggest that this store limit its alcohol capacity to 47.61m<sup>2</sup> in an effort to protect and improve the health status of Aberdeen city residents and request that approval for the increased seasonal display capacity 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 submits this letter of objection as the granting of the application 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)

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<sup>6</sup> <https://scotpho.nhsnss.scot.nhs.uk/scotpho/homeAction.do>

