

Date 21st February 2018
Enquiries to 01224 557047
Our Ref 20181013
Email: grampian.phalcohollicensing@nhs.net

Ms Jennifer Wilson
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 Wilson

**Licensing (Scotland) Act 2005 – Application for a Premises Licence
Shop, 19-21 Balnagask Road, Aberdeen, AB11 8HU**

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

Protecting and improving public health

The applicant seeks to apply for a premises licence for the property at 19-21 Balnagask Road, Torry, Aberdeen, AB11 8HU. This is an existing convenience store which currently operates without a licence. It is noted that the proposed capacity is 36.83m². This represents a sizeable increase in the current availability of alcohol in this neighbourhood and is more in keeping with the requirements of a medium sized supermarket rather than a local convenience store – see existing alcohol capacities as detailed on page 5.

This objection will focus on the following points:

1. Traffic Lights Data
2. Referrals to Integrated Alcohol Service
3. Hospital admission rates for wholly attributable alcohol- related conditions.
4. Alcohol related deaths
5. GP Alcohol Brief Intervention
6. Distance between existing off sales premises in the area.
7. Health Impact Assessment commissioned by Aberdeen City Licensing Forum

1. Traffic Lights Data

Scottish Public Health Observatory Data has been used to compile The Health Traffic Lights document for Aberdeen City¹. Post code data from sector AB118 has been extracted from this document and is illustrated below using health indicator areas for this community:

Key	Description
	5% higher than the Scottish average
	Within +/- 5% of the Scottish average
	5% lower than the Scottish average

Area	Alcohol related/attributable hospital patients	Alcohol related deaths	Early deaths from Coronary Heart Disease	Psychiatric Hospital Patients	Deaths from suicide	Early deaths from cancer
Torry West (52%)						
Torry East(48%)						

Across all areas it is clear to see that the health harms attributed to alcohol are higher than the Scottish Average.

Regularly drinking alcohol raises blood pressure and significantly increases the chance of people developing heart disease in the future².

Depression shares a complex, mutually reinforcing relationship with excessive alcohol consumption². 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.

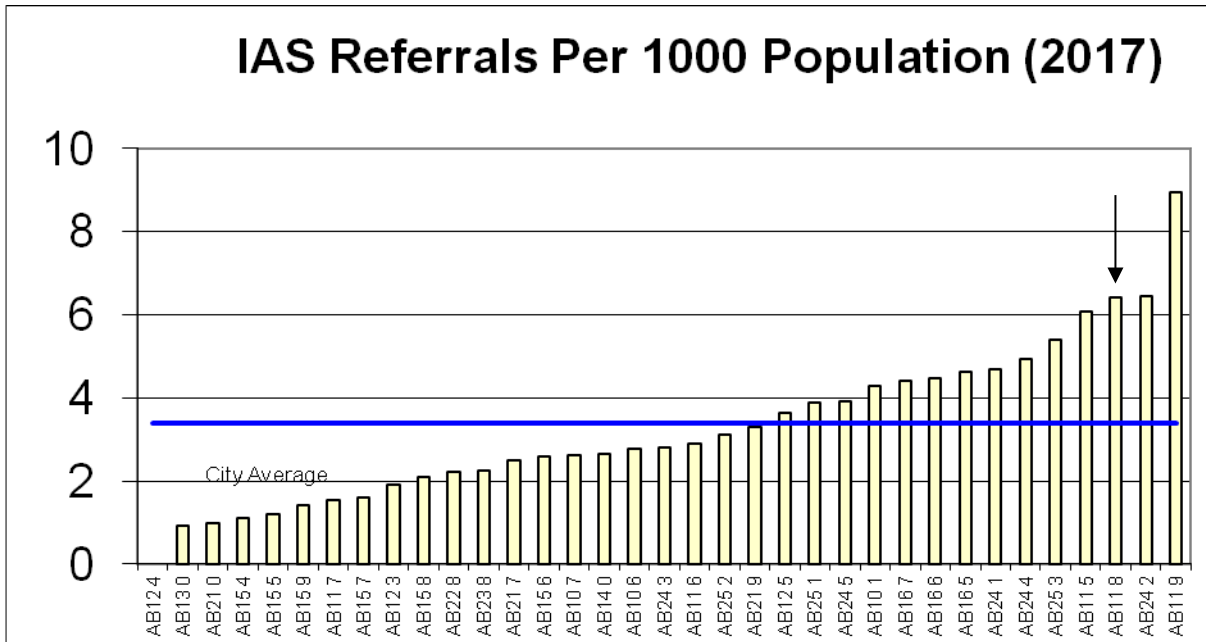
Harmful alcohol consumption is the third most common preventable cause of cancer in the UK².

¹ http://foi.nhsgrampian.org/globalassets/foidocument/dispublicdocuments---all-documents/ABERDEENCITYTraffic_Lights_Pack_2016.pdf

² <https://www.alcoholconcern.org.uk/factsheets>

2. Referrals to the Integrated Alcohol Service, Aberdeen

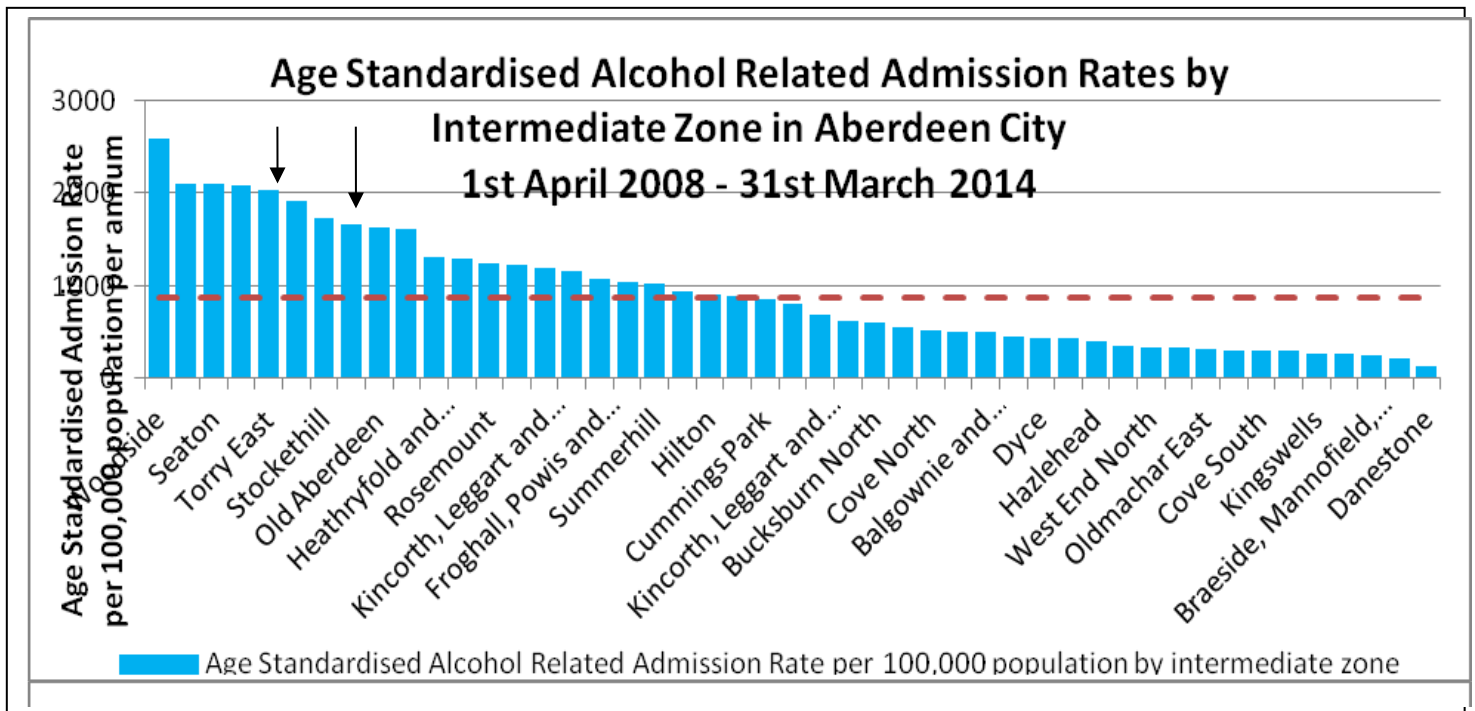
Referrals from this post code zone to the Integrated Alcohol Service at Cornhill Hospital have been consistently high over the past five years. In four out of the past five years referrals from this postcode zone have been placed within the top three post code zones for referral to service.



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

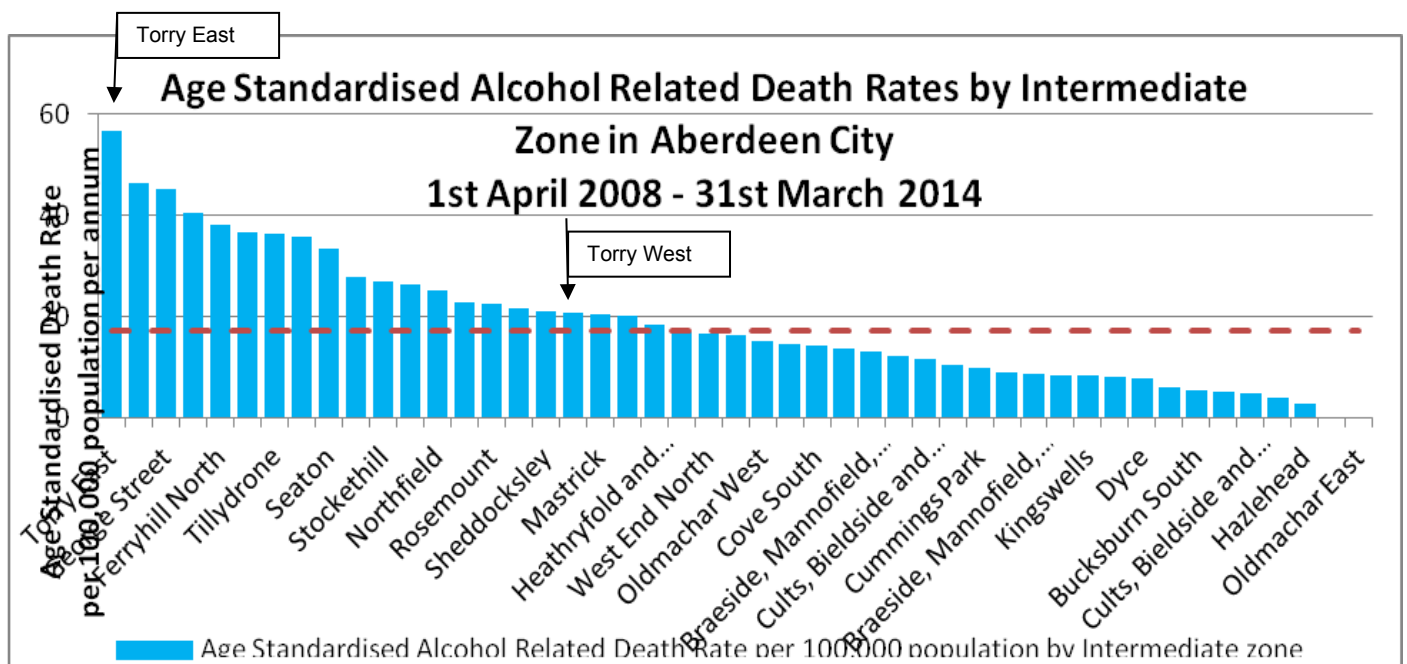
Trends in wholly-attributable alcohol-related hospital admissions in Grampian have been generally consistent with those seen nationally. The absolute numbers of people admitted to hospital each year as a result of alcohol rose since the late 1990s and in recent years, has fallen slightly. This fall is 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 harm are compatible with the context of people purchasing alcohol from off sales to drink at home and regularly exceeding low risk drinking guidelines.

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 dependency.



The table above gives a breakdown of hospital admission rates by intermediate zone. This is the most up to date data available in this format. Torry areas are showing high rates of admission and are ranked as 5th and 8th highest respectively for the city.

4. Alcohol related death rates.



Again this is the most up to date data in this format. Torry East is showing the highest levels of alcohol related death for the city with Torry West positioned 18th highest. In 2016, in Aberdeen, there were 56 deaths.

5. 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 2016 – March 2017 Torry Medical Practice identified 99 individuals with problematic alcohol use.

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

Within the immediate vicinity of The Shop at 19-21 Balnagask Road there are 5 off-sales premises.

Address	Distance from 19-21BR	Walking time	Capacity M ²
Tesco, Wellington Road	0.28km	3:50 minutes	141.116
Lidl, Wellington Road	0.28km	3:50 minutes	39.10
Icon Stores, Oscar Road	0.29km	3:04 minutes	8.34
George's, 106 Balnagask Rd	0.65km	7.06 minutes	17.69
Grampian Corner, 144 Walker Rd	0.58km	6:20 minutes	8.97

We are also aware of a further 7 licensed off-sales premises in the wider Torry area.

7. Health Impact Assessment commissioned by Aberdeen City Licensing Forum

In 2017, Aberdeen City Licensing Forum commissioned an impact assessment of alcohol licensing policy in the city. The following comments have been extracted from this document.

The Torry Alcohol Action Group described Torry as a community where

“a lot of people live their lives here, do their shopping here, do their socialising here and very rarely venture out of Torry”

It is clear from this local knowledge that the target market for the shop is the local community.

The Torry Alcohol Action Group went on to describe the impact of alcohol in the local community

“We have a lot of alcoholics, communities with a street drinking culture, so it's all off sales”

“Alcohol is definitely linked to violence at home, without a shadow of a doubt ... In terms of abuse of alcohol and drugs but alcohol is the one which generally leads to violence, whether that's domestic or just falling out with friends or whatever”

The impact assessment also spoke with individuals in recovery from alcohol dependence.

People in recovery described the path to dependence

“I just think the way growing up, I grew up on drink. See my parents there. I seen everyone there. Ken, when you turn 13, you want to be an adult. You think, let's just do what adults do. I think it's how you feel as well. If you're emotional or stressed, you're much more likely to go looking for a drink”

Drinking to cope was a core feature of the impact assessment, people in Aberdeen City who were experiencing emotional, financial, physical, relationship difficulties in life told us how they used alcohol to cope.

The path to dependence was described as something that “*crept up on you*”

“From an early age, I never thought I was going to be an alcoholic. No, I truthfully didn’t. I started to drink very early but, if someone had of said to me at 18, 19 xxx, you’re an alcoholic. No way! No way, I’m an alcoholic at my age? So kids, we get that denial. We denied that we were drinking so much”

People in recovery also described their experiences at their lowest moments

“it’s not pubs because pubs are too dear. You only go to a pub for a special event. So, problem drinking is done from supermarkets, local shops. If you’re only needing a bit of milk and a loaf of bread you cannae get it without passing alcohol”

People in recovery described that the business model operated by corner shops as one that is particularly effective at meeting their needs.

“It’s the cornershops especially, that sort of specialise in this budget, get drunk quick, the rotten, rat-poison cider type products, you know. You ain’t gonna get that so much in the supermarkets. But you do in these cornershops. It’s like they’re geared for alcoholics.”

Although the attraction of budget alcohol may start to be addressed by minimum unit pricing, it will only be effective as one of a series of measures that work together.

“I mean if you did raise the price, once the craving kicks in, you’re gonna need that drink so you’ll get it somehow.”

Whilst it might be an individual’s choice to buy a drink and relapse, it is very difficult to try and rebuild lives whilst simultaneously faced with the prospect of relapse.

“the script is, you know: you go in, I’m nae buying, I’m nae buying, I’m nae buying; you’re paying for what you bought you’re being really good. You bought everything that you need, you bought food: bingo! Here’s a bottle of vodka”

The proximity of shops does make a difference. Some people in recovery would walk whatever distance it took until they were able to buy a drink, others said that having fewer shops in the local area would act as a disincentive.

“Well, I used to like liquor myself, ken and... at the end of the day at 5 when you’re knackered with whatever you’re working on and you think cool. If I had to go walk a few miles to go get it to the big supermarket I’d be like no, ken?”

On the basis of the high levels of health harm, and close proximity of numerous other premises all operating similar business models and the expertise of people who know the local area and understand the challenges of recovering from alcohol dependence, I conclude that additional provision would further contribute to the already extremely high levels of harm in this area.

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 objection 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)