

Date 21st February 2018
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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 Provisional Premises Licence
Greyfriars Church, Queen Street, Aberdeen, AB10 1AP**

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 premises is a converted church providing 4 distinct entertainment spaces. The proposed range of activities on offer and the provision of dedicated dance and stage facilities would appear to meet the criteria for significant entertainment as detailed in the Aberdeen City Licensing Board Statement of Licensing Policy.

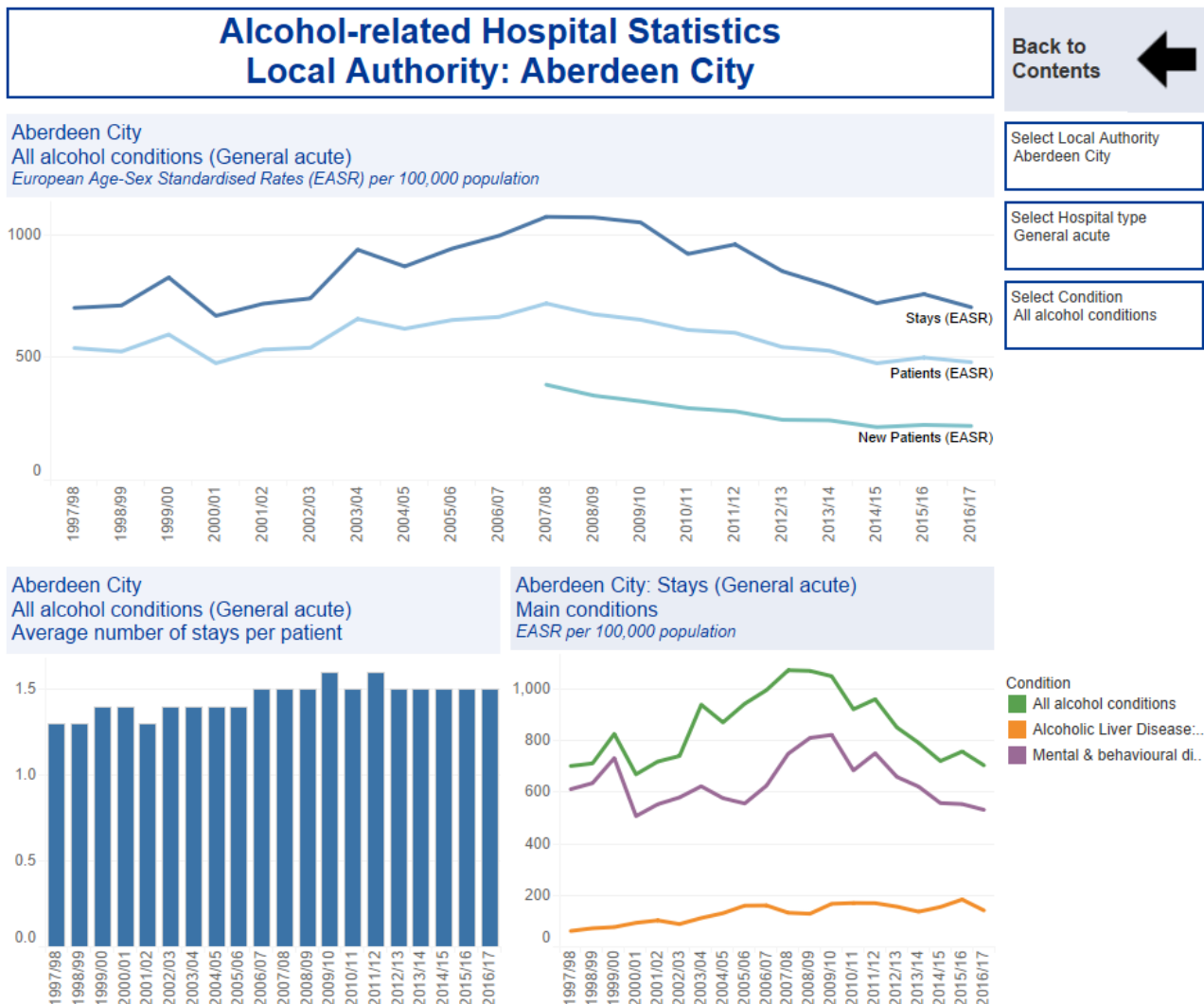
As the application stands, the trading times indicated for Friday and Saturday are not in keeping with the reasonable trading times recommended by the Licensing Board.

The Aberdeen City Licensing Board Statement of Licensing policy, 2013 – 2016 states at Section 20.3, paragraph 1:

“The Board will deem up to a maximum of 14 hours continuous trading in any 24 hour period to be reasonable. This is in accordance with the aforementioned Government Guidance which further states that any application for licensed hours for more than 14 hours should require further consideration to the effect of granting extra operating hours.”

The Board has already stated that the *“14 hour maximum trading period is not exceeded in order to help reduce alcohol related crime and health harms.”*

I would suggest that if this premises wishes a terminal hour of 03:00 on a Friday and Saturday they should amend their opening times to comply with the 14 hour maximum trading period and open at 13:00 hours on these days.



Although alcohol related hospital stays appear to be on a decreasing trend there is evidence of an increasing trend in alcoholic liver disease stays – see graph above. This figure is currently over double the rate recorded in 1997/98¹.

Recently published data on Alcohol Related Deaths for Aberdeen suggest an upward trend in the numbers of people dying as a result of alcohol².

When consideration is given to the health harms caused by alcohol for Aberdeen City Council residents I would request that this application for trading in excess of the reasonable 14 hours is not granted.

¹ <http://www.isdscotland.org/Health-Topics/Drugs-and-Alcohol-Misuse/Publications/2017-11-21/visualisation.asp>

² <https://www.nrscotland.gov.uk/files//statistics/alcohol-related-deaths/2016/alcohol-related-deaths-2016-tab3.pdf>

Actions that limit the availability and access to alcohol can only assist in improving health outcomes for the Aberdeen City population.

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)