

Date 26th April 2018
Enquiries to 01224 557047
Our Ref 20181028
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 Variation of Premises Licence
Slains Castle, 14 – 18 Belmont Street, Aberdeen, AB10 1JH**

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 seeks to make a number of variations to the Operating Plan. The variation of concern to NHS Grampian is listed below:

- Variation to amend the on sales terminal hour Thursday – Sunday to 11:00 – 02:00

The premises are currently trading:

Monday – Thursday 11:00 – 24:00
Friday & Saturday : 11:00 – 01:00
Sunday: 12:30 – 24:00

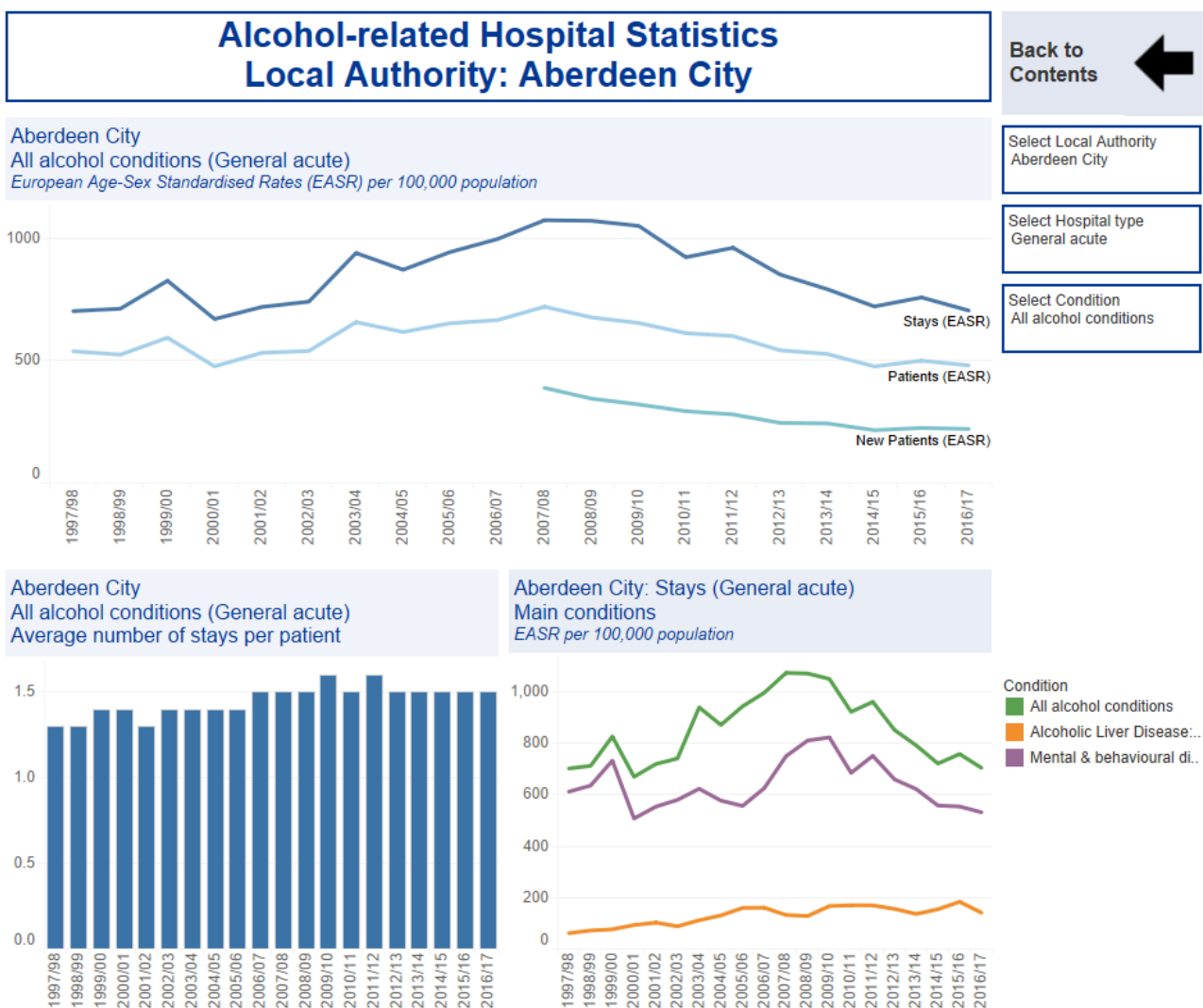
By amending the on sales terminal hour on Thursday through to Sunday to 02:00, on each of these days the premises will be exceeding the reasonable trading times recommended by the Licensing Board. The premises will be trading continuously for 15 hours on 4 days of the week.

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.”*

The health harms of alcohol in Aberdeen City are both substantial and increasing. 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.



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.

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

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.

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

For this reason, 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 & Dru

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

