

Date 24<sup>th</sup> October 2018  
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Our Ref 20181094  
Email: [grampian.phalcohollicensing@nhs.net](mailto:grampian.phalcohollicensing@nhs.net)

Ms Jenny 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 – Provisional Premises License  
Lidl Store, 48 – 50 Hutcheon Street, Aberdeen, AB25 3TB**

We 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**

The applicant seeks a license for a new Lidl Store at the above address. Data provided within this letter will focus on the evidenced health harms. The Licensing Board should be aware that there is also a high concentration of student accommodation within this area with blocks at Causwayend, Spring Garden and George Street. The Lidl store would be an additional resource to this community but we need to be mindful of the additional harm this could pose with the increased availability of alcohol. The purpose of this representation is to consider measures which could be incorporated into the design of the store which could help mitigate future harms.

This representation will focus on the following points:

1. Traffic Light Health Data
2. Referrals to Integrated Alcohol Service
3. Hospital admission rates for wholly attributable alcohol- related conditions.
4. Alcohol related deaths by neighbourhood areas.
5. Alcohol related hospital admissions by neighbourhood areas.
6. Distance between existing off sales premises in the area.
7. Information from the Centre for Research on Environment, Society and Health (CRESH)

## 8. 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 City<sup>1</sup>. Post code data from sector **AB25 3** 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
IZ024 (40.6%) George St						
IZ026 (45.5%) Ashgrove						
IZ029 (4.5%) Froghall/Powis & Sunnybank						
IZ033 (8.2%) Hilton						

Across the IZ024 area it is clear to see that the health harms attributed to alcohol are clearly higher than the Scottish Average. The population from this area will be the target footfall customers for this Lidl store although we also anticipate that customers will also travel by car and public transport to access the facility. Although further away from the location of the store, across the IZ026 area 4 out of the 6 alcohol related health indicators are higher than the Scottish Average. Areas IZ029 and IZ033 comprise less than 13% of the total area population

Regularly drinking alcohol raises blood pressure and significantly increases the chance of people developing heart disease in the future<sup>2</sup>.

Depression shares a complex, mutually reinforcing relationship with excessive alcohol consumption<sup>2</sup>. 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.

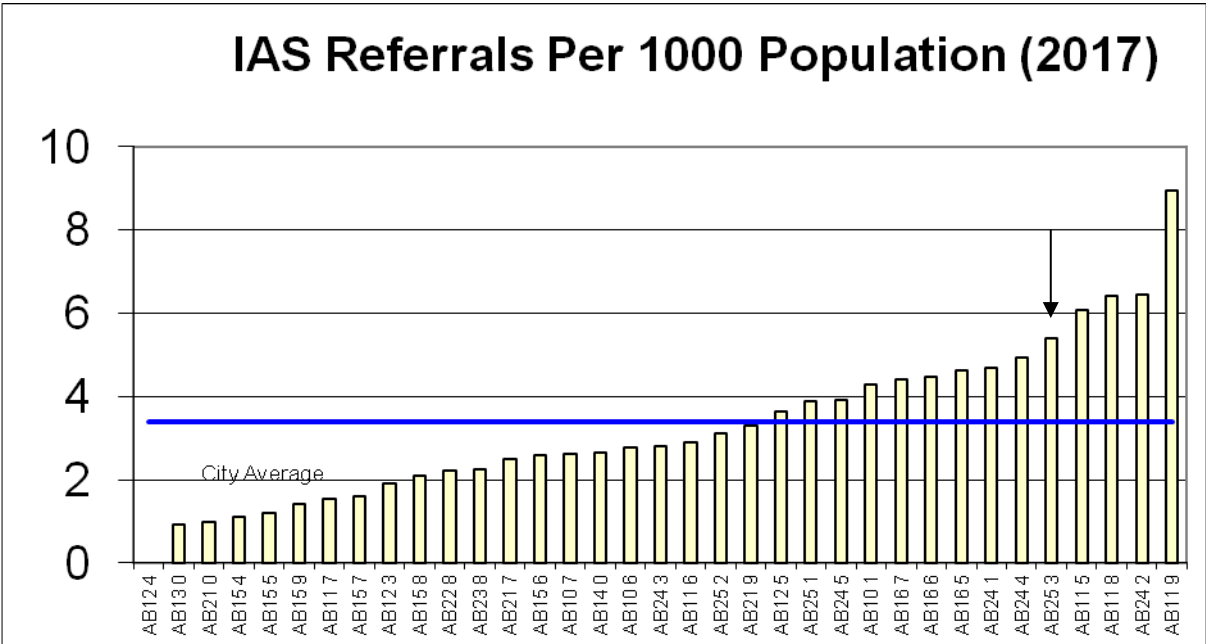
Harmful alcohol consumption is the third most common preventable cause of cancer in the UK<sup>2</sup>.

<sup>1</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&)

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

**2. Referrals to the Integrated Alcohol Service, Aberdeen**



**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.

## Alcohol-related Hospital Statistics Local Authority: Aberdeen City

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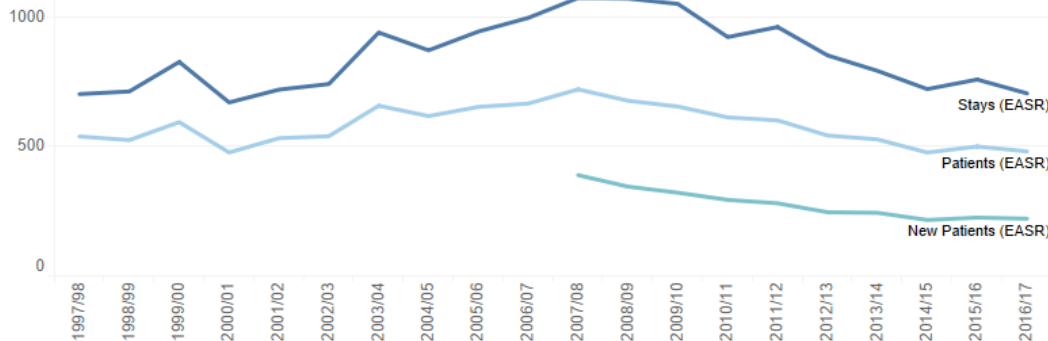


Aberdeen City  
All alcohol conditions (General acute)  
European Age-Sex Standardised Rates (EASR) per 100,000 population

Select Local Authority  
Aberdeen City

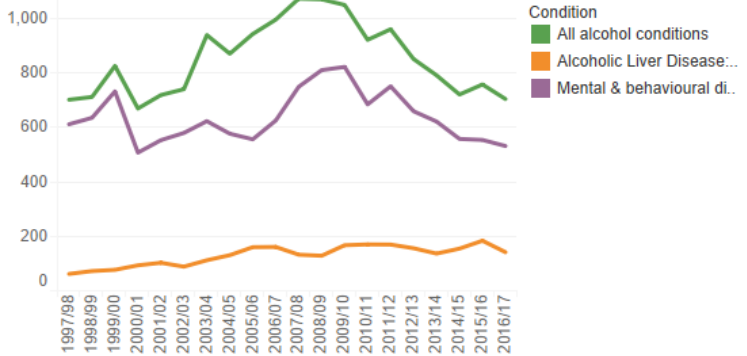
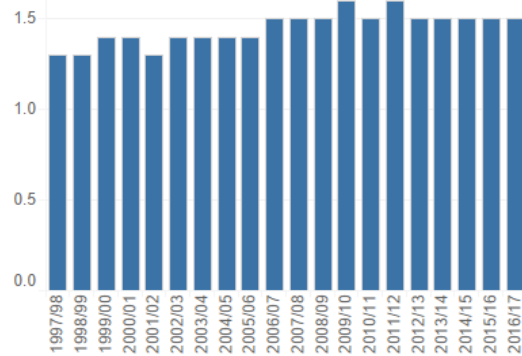
Select Hospital type  
General acute

Select Condition  
All alcohol conditions



Aberdeen City  
All alcohol conditions (General acute)  
Average number of stays per patient

Aberdeen City: Stays (General acute)  
Main conditions  
EASR per 100,000 population

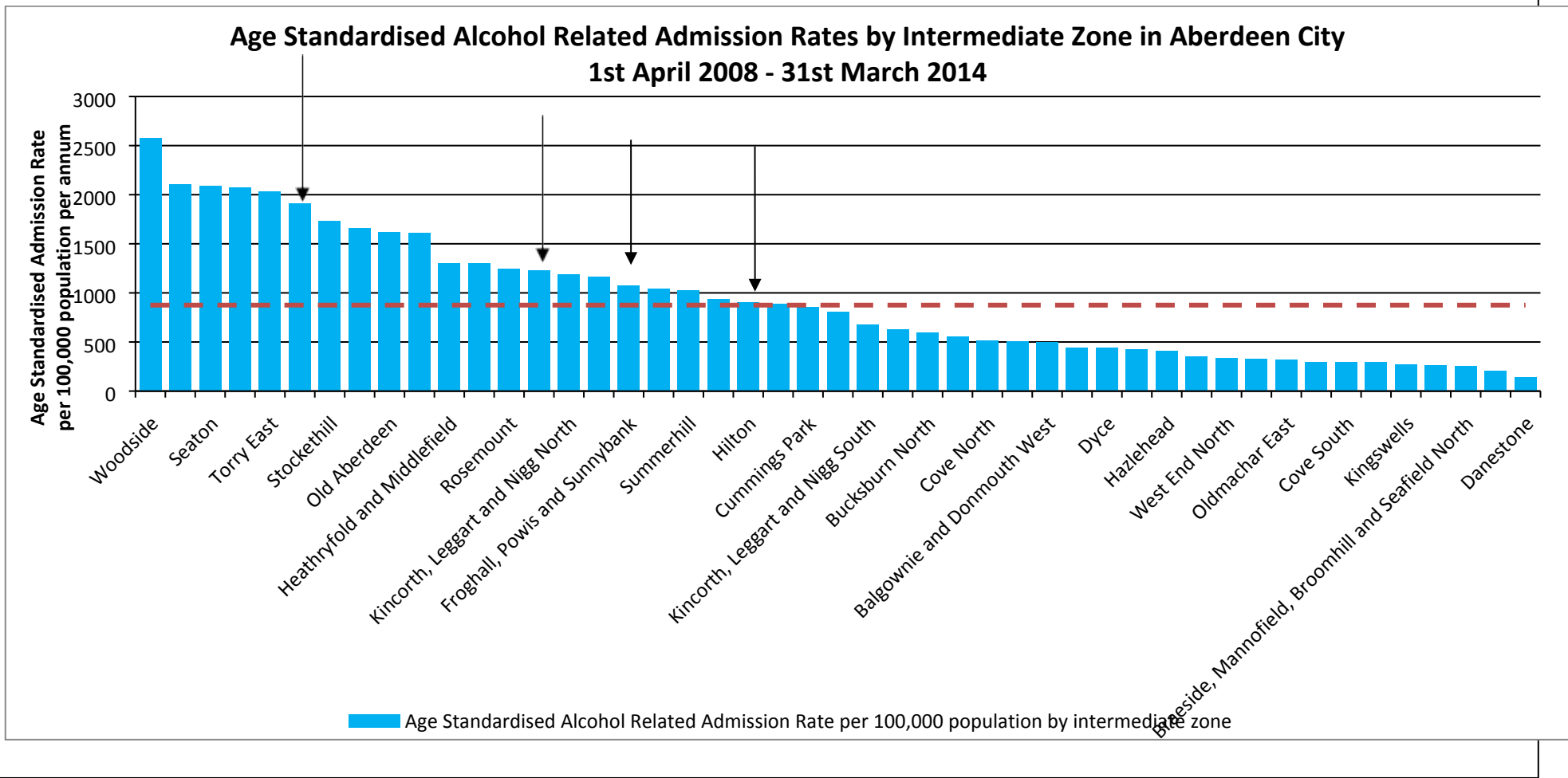


Although alcohol related hospital stays appear to be on a decreasing trend there is evidence of an increasing trend in alcoholic liver disease stays – see graph above. This figure is currently over double the rate recorded in 1997/98<sup>3</sup>.

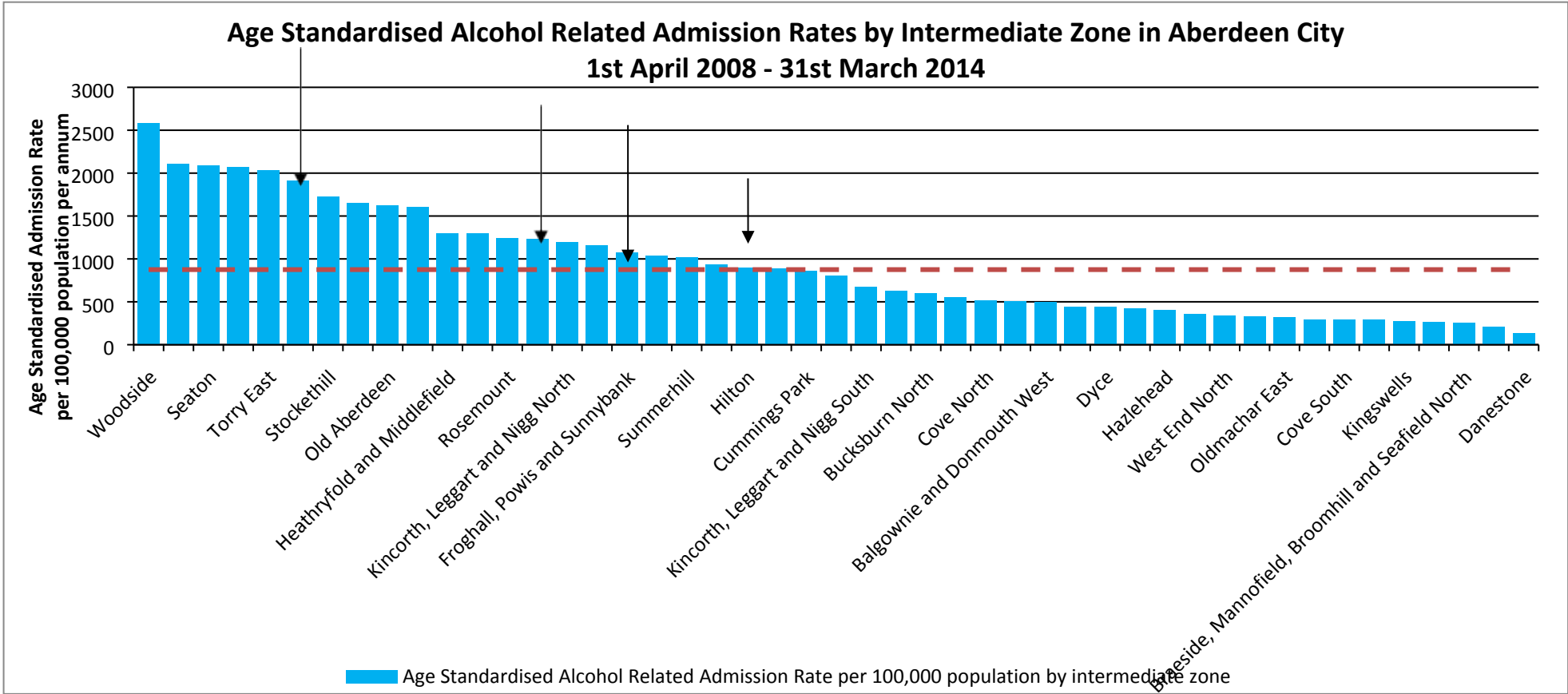
<sup>3</sup> <http://www.isdscotland.org/Health-Topics/Drugs-and-Alcohol-Misuse/Publications/2017-11-21/visualisation.asp>



4. Alcohol related deaths by neighbourhood areas.



5. Alcohol related hospital admissions by neighbourhood areas.



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

Within the immediate vicinity of the Lidl Store, 48-50 Hutcheon Street, there are 8 off-sales premises, all within a short 10 minute walk.

<b>Address</b>	<b>Capacity M<sup>2</sup></b>
Co-op, 466 George St	29.366
European Food, 568 George Street	2.68
Icon Stores, 569 George Street	11.78
Grosik, 530 – 532 George Street,	8.85
489 George Street	12.58
L & M Stores, 134 Hutcheon Street	7.68
Mathews Foods, 136-138 Causewayend	7.08
<b>Total Capacity</b>	<b>80.01</b>

If the license is granted the Lidl store will increase the alcohol capacity figure for this area to 139.91m<sup>2</sup> which represents an increase of approximately 75%.

There are at least a further 3 stores within the AB25 3 postcode zone which are out with a 10 minute walk. These are:

<b>Address</b>	<b>Capacity M<sup>2</sup></b>
Spare, Ashgrove Road	13.33
McColls, Back Hilton Road	31.06
Sainsburys, Berryden Road	188.28
Morrisons	228.11



## 7. Information from the Centre for Research on Environment, Society and Health (CRESH).

Using the CRESH<sup>4</sup> database the following figures have been provided and are based on the Off Alcohol Sales for 2016 using the buffer distance of 800m from the centre of this datazone, which equates to an approximate 10 minute walk. The statistics detailed below are based on the IZ024 (40.6%) George Street area and are compared to the Scottish Average.

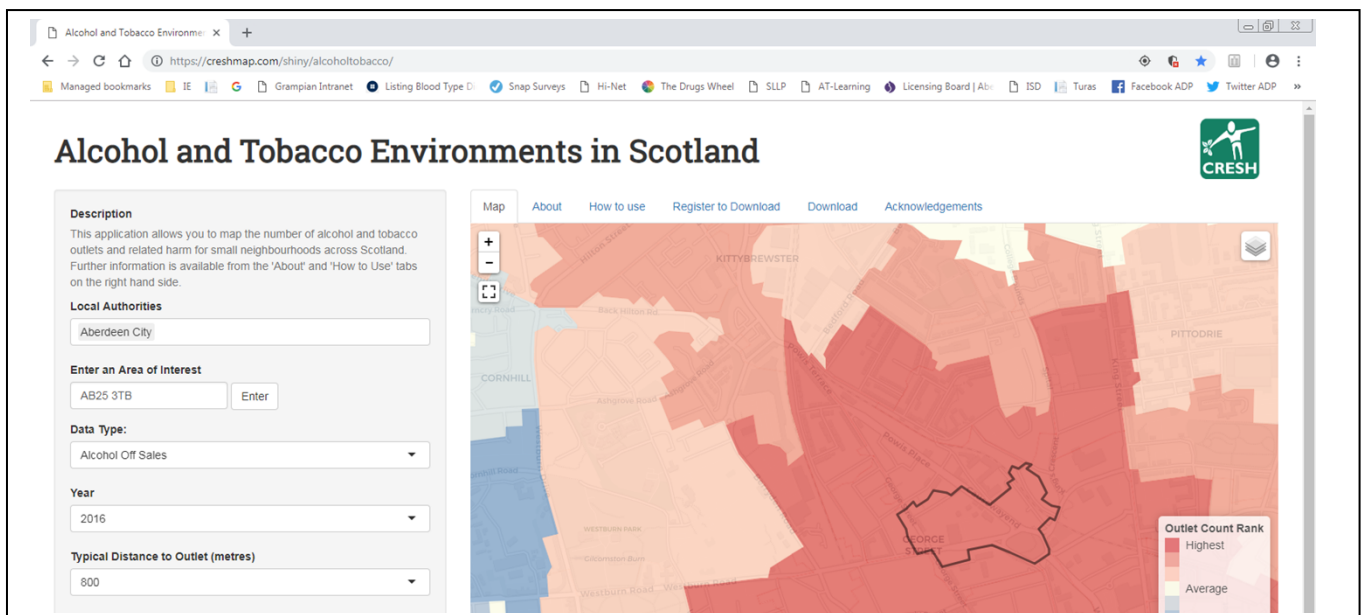
### Outlet Count

The number of outlets around the population centre is 30 which is 550% of the Scottish average.

- This datazone is in the **top 10%** of neighbourhoods in Scotland.

### Health

- The standardised mortality ratio for alcohol related deaths is between 180 and 587, which is in the **top 10%** of neighbourhoods in Scotland.



As you can see from the snapshot taken of the CRESH mapping tool, the AB25 3TB post code area is ranked among the highest in Scotland for alcohol off sales outlets. Across the whole of Scotland, neighbourhoods with the highest alcohol outlet availability had significantly higher rates of alcohol-related health harm and crime<sup>5</sup>.

<sup>4</sup> <https://creshmap.com/shiny/alcoholtobacco/>

<sup>5</sup> <https://www.alcohol-focus-scotland.org.uk/media/310730/alcohol-outlet-availability-and-harm-in-aberdeen-city.pdf>

## 8. Health Impact Assessment commissioned by Aberdeen City Licensing Forum

The impact assessment 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”*

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, we conclude that additional provision would further contribute to the already high levels of harm in this area.

Actions that limit the availability and access to alcohol can only assist in improving health outcomes for the Aberdeen City population. We would request that Lidl give consideration to:

- Reducing the capacity figure to between 35 and 49 square metres for this store to be consistent with other Lidl stores in Aberdeen City.
- Not positioning alcohol on the end of aisles
- Placing the display of alcohol in a part of the store whereby it is possible to enter the store, purchase other items and pay without having to pass through the alcohol section.
- Not using island gondolas for the display of alcohol products
- Not positioning alcohol near products aimed at children, or for use by children (e.g. baby products, etc)

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 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

Dr Tara Shivaji  
Consultant in Public Health

Heather Wilson  
Health Improvement Officer (Alcohol & Drugs)