



19<sup>th</sup> March 2018

Dear Licensing Board

**Re: Lidl Forfar – Application for variation of a premises licence**

The NHS Tayside Public Health Directorate and Angus Alcohol and Drugs Partnership wish to object to the above application for variation of an off-sales premises licence. In particular we wish to object to the request to increase the non-seasonal trading capacity.

Strong evidence exists to show that increased availability of alcohol results in increased alcohol consumption and consequently increased levels of alcohol-related harm within a population. Furthermore alcohol-related harm disproportionately affects people living in areas of greater socioeconomic deprivation and widens health inequalities.

The Licensing (Scotland) Act 2005 places a direct obligation on local licensing boards to consider the protection and improvement of public health when granting or reviewing licences.

The harmful use of alcohol is known to be a causal factor in over 200 diseases and injury conditions.<sup>1</sup>

In 2016, there were 445 alcohol-related A&E attendances by Angus residents. Individuals from the most deprived areas in Angus, some areas of which are in Forfar, accounted for over three times the rate of presentations to A&E compared with those in the least deprived areas.

In Angus, the number of alcohol-related deaths increased from 8 in 1990 to 29 in 2005. Since then numbers have fluctuated but remain considerably higher than those recorded in 1990.

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<sup>1</sup> World Health Organization. Global status report on alcohol and health 2014. Available from: [http://www.who.int/substance\\_abuse/publications/global\\_alcohol\\_report/en/](http://www.who.int/substance_abuse/publications/global_alcohol_report/en/) [Accessed May 2017]

Although the annual alcohol-related death rate of Angus is slightly lower than that of Scotland's overall, the Scottish average is a poor benchmark - Scotland has one of the highest levels of alcohol-related harm in Western Europe and is consistently the UK country with the highest rate of alcohol-related deaths. The alcohol-related death rates in Angus are higher than those seen elsewhere in the UK. The only exceptions being the alcohol-related death rate seen in males in Northern Ireland in recent years and the alcohol-related death rate for males in Wales for the year 2012.

The drinking of alcohol also results in a significant impact on healthcare and policing resource in Angus. Alcohol was a recorded factor in 74% of serious assault offences. The financial burden from all alcohol-related harm to Angus is estimated to be more than £33 million per year.<sup>2</sup>

In regards to where alcohol is bought from, the off-trade sale of alcohol has increased markedly in Scotland since 1994 whereas the on-sales trade has decreased. In 2015, 20% more alcohol was sold per adult in Scotland than in England and Wales, and almost all of this (97%) was because of higher sales in supermarkets and off-licences.<sup>3</sup> Almost three-quarters of alcohol currently sold in Scotland is purchased from off-sales trade.

The contribution made to alcohol-related harm from off-sales outlets is greater than that from on-sales outlets.<sup>4</sup> Reasons for this are thought to include: the alcohol available to buy from off-sales outlets is generally cheaper than from on-sales outlets; large volumes of alcohol are obtainable from off-sales outlets and there is a lack of supervision of alcohol consumption when alcohol is purchased from an off-sales outlet.<sup>5</sup>

The extent to which alcohol is available is strongly associated with alcohol consumption<sup>6</sup> and, in turn, alcohol-related harm.<sup>7,8,9,10</sup> Greater density of alcohol

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<sup>2</sup> Alcohol Focus Scotland. The cost of alcohol in Angus 2010/11. Available from: [www.alcohol-focus-scotland.org.uk/media/61408/The-Cost-of-Alcohol-Angus.pdf](http://www.alcohol-focus-scotland.org.uk/media/61408/The-Cost-of-Alcohol-Angus.pdf) [Accessed February 2018]

<sup>3</sup> Beeston C, McAdams R, Craig N, Gordon R, Graham L, MacPherson M, McAuley A, McCartney G, Robinson M, Shipton D, Van Heelsum A. Monitoring and Evaluating Scotland's Alcohol Strategy. Final Report. Edinburgh: NHS Health Scotland; 2016.

<sup>4</sup> Richardson EA, Hill SE, Mitchell R, Pearce J, Shortt NK. Is local alcohol outlet density related to alcohol-related morbidity and mortality in Scottish cities?. *Health & place*. 2015;33:172-80.

<sup>5</sup> Forsyth AJ, Davidson N. Community off-sales provision and the presence of alcohol-related detritus in residential neighbourhoods. *Health & place*. 2010;16(2):349-58.

<sup>6</sup> Bryden A, Roberts B, McKee M, Petticrew M. A systematic review of the influence on alcohol use of community level availability and marketing of alcohol. *Health & place*. 2012;18(2):349-57.

<sup>7</sup> Gruenewald PJ, Freisthler B, Remer L, LaScala EA, Treno A. Ecological models of alcohol outlets and violent assaults: crime potentials and geospatial analysis. *Addiction*. 2006;101(5):666-77.

<sup>8</sup> LaScala EA, Johnson FW, Gruenewald PJ. Neighborhood characteristics of alcohol-related pedestrian injury collisions: a geostatistical analysis. *Prevention Science*. 2001 Jun 1;2(2):123-34.

outlets leads to increased physical availability to consumers and lower alcohol pricing (due to greater competition between retail outlets for sales).

In Scotland research has shown that neighbourhoods with higher numbers of alcohol outlets have significantly higher alcohol-related death rates and alcohol-related hospitalisation rates.<sup>11</sup> Residents of neighbourhoods with the highest availability are more than twice as likely to die from an alcohol-related death than those with the fewest outlets.<sup>12</sup> Furthermore, higher densities of off-sales alcohol outlets are largely found in the most deprived areas of Scotland.<sup>13</sup>

Neighbourhoods with higher numbers of alcohol outlets have significantly higher alcohol-related hospitalisation and death rates. Overall Angus has an alcohol outlet availability that is lower than Scotland as a whole but within Angus there are areas of high alcohol availability and Forfar is one of these.

Given that i) alcohol-related harm occurs as a direct consequence of increased alcohol consumption which in turn occurs as a result of increased alcohol availability ii) the contribution made to alcohol-related harm is greatest from off-sales trade and iii) Forfar is an area of high alcohol availability already, the Public Health Directorate and Angus Alcohol and Drug Partnership would strongly recommend that Angus Licensing Board refuses this application to increase the non-seasonal trading capacity in the Forfar Lidl store.

Yours faithfully,



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On behalf of the NHS Tayside Public Health Directorate and the Angus Alcohol and Drugs Partnership

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<sup>9</sup> Pereira G, Wood L, Foster S, Haggart F. Access to alcohol outlets, alcohol consumption and mental health. PLoS One. 2013 Jan 16;8(1):e53461.

<sup>10</sup> Theall KP, Scribner R, Cohen D, Bluthenthal RN, Schonlau M, Lynch S, Farley TA. The neighborhood alcohol environment and alcohol-related morbidity. Alcohol and alcoholism. 2009 Sep 1;44(5):491-9.

<sup>11</sup> Richardson EA, Shortt NK, Pearce J, Mitchell R. Alcohol-related illness and deaths in Scottish neighbourhoods: is there a relationship with the number of alcohol outlets. Edinburgh: Centre for Research on Environment, Society and Health and Alcohol Focus Scotland. 2014.

<sup>12</sup> Richardson EA, Shortt NK, Pearce J, Mitchell R. Alcohol-related illness and deaths in Scottish neighbourhoods: is there a relationship with the number of alcohol outlets. Edinburgh: Centre for Research on Environment, Society and Health and Alcohol Focus Scotland. 2014.

<sup>13</sup> Shortt NK, Tisch C, Pearce J, Mitchell R, Richardson EA, Hill S, Collin J. A cross-sectional analysis of the relationship between tobacco and alcohol outlet density and neighbourhood deprivation. BMC public health. 2015;15(1):1014.

