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Wednesday, 06 February 2013

Alcohol Consultation  
Drugs and Alcohol Unit  
Home Office  
4<sup>th</sup> Floor Fry Building  
2 Marsham Street  
London  
SW1P 4DF

Dear Sirs

### Home Office Consultation – ‘A consultation on delivering the Government’s policies to cut alcohol fuelled crime and anti social behaviour’

The Institute of Licensing (IoL) is the professional body for licensing practitioners in England, Wales and Northern Ireland with a growing membership in Scotland. The IoL is pleased to have the opportunity to respond to the Home Office consultation in relation to delivery of the Government’s Alcohol Strategy.

In drafting this response, the IoL is looking to convey the responses from our members which have been gathered via our own online survey. In total, 80 IoL members submitted a response to the survey. Respondents can be broken down as follows:

Licensing authority officer	53.8%
Licensing authority	11.5%
Person or organisation specialising in licensing law	9.0%
Police officer	9.0%
Police force	6.4%
Local Government (other)	5.1%
Member of the public	3.8%
Other (please specify)	3
Small or medium sized enterprise involved in licensed trade/club premises (up to 50 employees)	1.3%

## ***5. A minimum unit price for alcohol***

The consultation states that the Government wants to ensure that the chosen price level is targeted and proportionate, whilst achieving a significant reduction of harm and is consulting on the introduction of a recommended minimum unit price of 45p. A table is provided (shown below) giving estimated impacts of this level of minimum unit price.

Impacts of a 45p minimum unit price <sup>11</sup>	
Total reduction in alcohol consumption	-3.3%
Reduction in number of crimes per year	5,240
Crime savings per year (including QALYs <sup>12</sup> related to crime)	£12.9m
Number of deaths saved per year (at full effect)	714
Number of hospital admissions saved per year (at full effect)	24,600
Direct health care cost savings per year (at full effect)	£82.0m
Health QALY savings per year (at full effect)	£319m
Increase in spending for moderate drinkers (per year)	£7
Increase in spending for hazardous drinkers (per year)	£49
Increase in spending for harmful drinkers (per year)	£118
Increase in revenue to business (in year 1)	£1,040m
Impact on the public purse (as a result of a loss in alcohol duty)	-£200m

### Consultation Question 1:

*Do you agree that this MUP level would achieve these aims? (Please select one option):*

✓ No

63% of respondents do not agree with a further 14% stating 'don't know'.

*If you think another level would be preferable, please set out your views on why this might be in the box below (keeping your views to a maximum of 200 words).*

Detailed responses indicate that those in favour of MUP consider the proposed level too low, and there is a desire for consistency across the UK as well as the suggestion that plans for MUP should be stalled pending the outcome of the European challenge to the Scottish MUP proposals.

Of the 11 detailed responses to this question only 1 respondent considered that there would probably be positive outcomes following the introduction of MUP at the proposed level.

### Consultation Question 2:

*Should other factors or evidence be considered when setting a minimum unit price for alcohol? (Please select one option):*

Mixed views on this question with 30% saying yes and 70% evenly split between 'No' and 'Don't know'.

Factors suggested for consideration include:

- Concerns that MUP may be found to be illegal (through the European Court challenge to Scottish proposals)
- Pricing unlikely to affect those addicted to alcohol
- Extra money from MUP being put towards education, enforcement and care/treatment of alcohol dependants
- Stricter controls on alcohol advertising and alcohol displays in supermarkets
- Concerns in relation to illegal / black market sales
- Controls on the number of alcohol outlets (reducing availability)

In addition the following questions were posed within the responses:

- What research has been done in relation to young people and pre-loading?
- Has the increase in price of tobacco made a significant effect (when taken in isolation)

### Consultation Question 3:

*How do you think the level of minimum unit price set by the Government should be adjusted over time? (Please select one option):*

- ✓ The minimum unit price should be reviewed after a set period.

58% supported a review of MUP after a set period with a further 31% voting for an automatic update in line with inflation annually.

Comments from respondents reflected the vote with comments reiterating disagreement with MUP and supporting the need to review the MUP to assess its effectiveness against the desired outcomes.

### Consultation Question 4:

*The aim of minimum unit pricing is to reduce the consumption of harmful and hazardous drinkers, while minimising the impact on responsible<sup>15</sup> drinkers. Do you think that there are any other people, organisations or groups that could be particularly affected by a minimum unit price for alcohol? (Please select one option):*

Answer Options	Response Percent
YES	34.8%
NO	39.1%
Don't know.	26.1%

Survey responses listed consumers (generally but especially those on low income), retailers, and regulators. Concerns about the knock on effect in terms of illegal imports, black market sales and the increased regulatory burden in counteracting this, together with the repeated view that the proposed MUP will not affect determined alcohol dependants who will look to access alcohol (or a substitute substance) at almost any cost.

## 6. A ban on multi-buy promotions in the off-trade

The stated aim of a ban on multi buy promotion would be to stop promotions that encourage people to buy more than they otherwise would, making it cheaper (per item) to purchase more than one of a product than to purchase a single item. The proposed treatment of different types of promotions is set out in the table below.

Types of promotions that <b>WOULD</b> be banned	Types of promotions that would <b>NOT</b> be banned
This is where the price of a single product in a multi-pack is sold for less than the price of buying that same product on its own. This will stop incentivising purchases of more products than people would otherwise buy.	A ban would not affect discounts which are not linked to the purchase of multiple bottles, or which are linked to the volume rather than the number of products. It would not stop retailers cutting the price of individual items to match multipack prices, or prevent them from having a minimum-buy rule.
two for the price of one three for the price of two buy-one-get-one-free buy six get 20% off	half price offers 'a third off' offers £x off any individual item
24 cans of lager costing less than 24 times the cost of one can of lager in the shop A case of wine sold cheaper than the individual price at which the same bottles are sold in the shop Three for £10 where each bottle costs more than £3.33	Cutting the price of a single can of lager so that it is as cheap as the cans in the multipack A case of wine can be priced at any level if the items are not available to buy individually Three for £10 as long as you can also buy each individual item in the multi-pack for £3.33
Different multipack prices or multi-buy multipack offers. For example, 10 bottles of alcopops being sold for less per bottle than a package of four bottles, or three packages of 10 bottles being sold for less than three times the price of one 10 bottle pack.	Different prices for the same alcohol products sold in differed sized containers, where there is a per unit difference. For example, a box of wine can still be sold for less than the price of four bottles of the same wine.

The consultation states 'A ban on multi-buy discounts would not include deals which are not linked to the purchase of multiple items. A ban would not stop retailers discounting individual items (such as 'was £10, now £6'), or prevent them from requiring their consumers to purchase a minimum quantity'.

#### *Consultation Question 5:*

*Do you think there should be a ban on multi-buy promotions involving alcohol in the off-trade? (Please select one option):*

Answer Options	Response Percent
YES	46.3%
NO	51.2%
Don't Know	2.4%

#### *Consultation Question 6:*

*Are there any further offers which should be included in a ban on multi-buy promotions? (Please select one option):*

- ✓ No – 61% said No with a further 28 % who did not know

*If yes, please specify in the box below (keeping your views to a maximum of 100 words).*

Comments from respondents included:

- Disagreement with ban and concern that the banned v permitted promotions would negate any impact on these proposals in any case
- A ban on all off-trade promotions for alcohol
- Application of 'sales rules' to multipacks (not sold at the low price in any of the firm's outlets in the last 28 days) where it is not at that time available as individual items
- Concerns re hidden pricing (e.g. meal for £10 including a bottle of wine)
- Consideration of media role in alcohol advertising

#### *Consultation Question 7:*

*Should other factors or evidence be considered when considering a ban on multi-buy promotions? (Please select one option):*

Answer Options	Response Percent
YES	18.4%
NO	50.0%
Don't Know	31.6%

*If yes, please specify in the box below (keeping your views to a maximum of 200 words).*

Considerations listed by respondents highlighted concerns about the potential effect on the drinks industry, including social and private members clubs, together with the fact that the proposed measures will impact on all consumers including those on lower incomes. In addition, responses question what evidence there is to suggest that multi buys increase alcohol consumption when the majority of shoppers may simply be buying to store and save money when the promotions are available.

#### *Consultation Question 8:*

*The aim of a ban on multi-buy promotions is to stop promotions that encourage people to buy more than they otherwise would, helping people to be aware of how much they drink, and to tackle irresponsible alcohol sales. Do you think that there are any other groups that could be particularly affected by a ban on multi-buy promotions? (Please select one option):*

Answer Options	Response Percent
YES	35.0%
NO	42.5%
Don't Know	22.5%

*If yes please specify in the box below (keeping your views to a maximum of 100 words).*

Those who replied 'yes' to the above question considered that the proposals will affect all consumers, retailers (particularly small independent retailers), potentially local community groups. The recurring theme in the responses to this question was that all consumers including responsible and irresponsible drinkers alike will be affected by the proposals.

## 7. Reviewing the mandatory licensing conditions

The five mandatory licensing conditions currently set out in regulations in relation to the supply of alcohol are:

- i. A ban on irresponsible promotions.
- ii. A ban on dispensing alcohol by one person directly into the mouth of another.
- iii. A requirement to provide free tap water on request to customers.
- iv. A requirement to have an age verification policy to prevent the sale of alcohol to persons under 18 years of age. – surely if this was standardised then it would be easier for the general public to get to grips with as well as bar and shop staff.
- v. A requirement to make available to customers small measures such as half pints of beer or cider or 125ml glasses of wine.

### Consultation Question 9:

*Do you think each of the mandatory licensing conditions is effective in promoting the licensing objectives (crime prevention / public safety / public nuisance / prevention of harm to children - see glossary)? Please state Yes / No / Don't know in each box:*

#### Prevention of crime & disorder

Answer Options	Yes	No	Don't know	Response Count
A. Irresponsible promotions (see condition i above)	17	22	0	39
B. Dispensing alcohol directly into the mouth (see condition ii above)	22	12	5	39
C. Mandatory provision of free tap water (see condition iii above)	16	20	3	39
D. Age verification policy (see condition iv above)	32	6	1	39
E. Mandatory provision of small measures (see condition v above)	16	21	2	39

#### Public safety

Answer Options	Yes	No	Don't know	Response Count
A. Irresponsible promotions (see condition i above)	17	21	1	39
B. Dispensing alcohol directly into the mouth (see condition ii above)	24	11	3	38
C. Mandatory provision of free tap water (see condition iii above)	23	12	3	38
D. Age verification policy (see condition iv above)	23	13	2	38
E. Mandatory provision of small measures (see condition v above)	16	18	4	38

#### Prevention of public nuisance

Answer Options	Yes	No	Don't know	Response Count
A. Irresponsible promotions (see condition i above)	17	20	1	38
B. Dispensing alcohol directly into the mouth (see condition ii above)	18	15	4	37
C. Mandatory provision of free tap water (see condition iii above)	14	20	4	38
D. Age verification policy (see condition iv above)	25	11	2	38

E. Mandatory provision of small measures (see condition v above)	14	20	4	38
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Protection of children from harm				
Answer Options	Yes	No	Don't know	Response Count
A. Irresponsible promotions (see condition i above)	14	24	0	38
B. Dispensing alcohol directly into the mouth (see condition ii above)	13	19	5	37
C. Mandatory provision of free tap water (see condition iii above)	11	21	6	38
D. Age verification policy (see condition iv above)	31	6	1	38
E. Mandatory provision of small measures (see condition v above)	9	26	3	38

			Question Totals
Answered Question			39
Skipped Question			41

#### Consultation Question 10:

*Do you think that the mandatory licensing conditions do enough to target irresponsible promotions in pubs and clubs? (Please select one option):*

Answer Options	Response Percent
YES	42.1%
NO	50.0%
Don't Know	7.9%

*If no, please state what more could be done (keeping your views to a maximum of 100 words).*

Responses concern the difficulty of enforcing subjective conditions and the requirement to show that a promotion 'carries a significant risk of leading or contributing to crime and disorder, prejudice to public safety, public nuisance, or harm to children'. One respondent says 'it would have been simpler if the condition was worded so that free bars or all inclusive drinks promotions were prohibited regardless of whether there was evidence of crimes committed as a result.'

Others feel the conditions should be simplified, and some feel that the conditions are ignored because they are not understood and are difficult to enforce.

#### Consultation Question 11:

*Are there other issues related to the licensing objectives (prevention of crime and disorder / public safety/ prevention of public nuisance / protection of children from harm - see glossary) which could be tackled through a mandatory licensing condition? (Please select one option):*

Answer Options	Response Percent
YES	26.3%
NO	44.7%
Don't Know	28.9%

*If yes, please specify (keeping your views to a maximum of 200 words).*

Of the 26% who answered yes to this question, most supported a mandatory challenge 21 (or 25) policy and for policies and staff training to be documented.

### Consultation Question 12:

*Do you think the current approach, with five mandatory licensing conditions applying to the on-trade and only one of those to the off-trade, is appropriate? (Please select one option):*

Answer Options	Response Percent
YES	35.1%
NO	59.5%
Don't Know	5.4%

*If no, please explain why you think the current approach is not the best approach (keeping your views to a maximum of 100 words).*

Nearly 60% of respondents considered this to be inappropriate and responses indicated strong support for more attention to off-licences through the mandatory conditions although reiterated the earlier points about enforceability and understanding of the conditions. Many feel that the on-licensed trade should be held more accountable for alcohol related problems when pre-loading and under-age sales are prevalent problems.

One suggestion was that licences should mirror the Gambling Act premises licences, with mandatory and default conditions tailored to the type of business, while another felt that the law as it stands should be sufficient without any mandatory conditions.

## 8. Health as a licensing objective for cumulative impact policies

The consultation states 'A CIP introduces a rebuttable presumption that all new licence applications and variations in that area will normally be refused if the licensing authority receives a relevant representation stating that the application will add to the cumulative impact. However each application must still be considered on its own merits and the licensing authority may still grant the application if it is satisfied that the application will not contribute to the cumulative impact.'

The consultation proposes 'that licensing authorities will be able to take evidence of alcohol-related health harm into account in deciding whether to introduce a CIP and the extent of that CIP. This would be a discretionary power and not an obligation.' ...and 'will allow local health bodies to fully contribute to local decision making and mean licensing authorities can restrict the number of licensed premises in the local area on the basis of robust local evidence.'

### Consultation Question 13:

*What sources of evidence on alcohol-related health harm could be used to support the introduction of a cumulative impact policy (CIP) if it were possible for a CIP to include consideration of health? Please specify, keeping your views to a maximum of 200 words.*

Varying responses to this question with a number of respondents clearly not in favour of the proposal as it stands given the none statutory footing of CIPs (one says: 'I do not believe the concept of a CIP as currently used is lawful anyway, as it is not contained in the legislation, but introduced by Guidance, it is hard to say how an unlawful process can be usefully altered').

Suggestions from those in support included A&E statistics, Health Board data, GP data on referrals of alcoholics and chronic drinkers

Some respondents acknowledge that longer term health stats are more of a problem as the causal link between long term health issues such as incidence of liver disease and the number of outlets will be difficult to establish.



#### Consultation Question 14:

*Do you think any aspects of the current cumulative impact policy process would need to be amended to allow consideration of data on alcohol-related health harms? (Please select one option):*

Answer Options	Response Percent
YES	38.2%
NO	23.5%
Don't Know	38.2%

*If yes, please specify which aspects, keeping your views to a maximum of 200 words.*

Views supported putting CIPs on a statutory footing and introducing public health as a 5<sup>th</sup> licensing objective within the Act. Others suggested that a health related CIP would not benefit the community, with others suggesting a health CIP could be used to reduce hours for supermarkets in a given area.

#### Consultation Question 15:

*What impact do you think allowing consideration of data on alcohol-related health harms when introducing a cumulative impact policy would have if it were used in your local area? Please specify in the box below, keeping your views to a maximum of 200 words. Please provide evidence to support your response*

Very mixed views on this question with many feeling that there would be little or no impact and others considering that it would have a negative impact on retailers and the local economy. Some felt that there would be a positive impact (a reduction in alcohol related issues) but also some concern that there is a need for consistently recorded data to enable it to be effective as evidence to support a CIP.

One respondent reiterates their earlier comment that this would in effect re-introduce a 'need' test.

## 9. Freeing up responsible businesses

#### Consultation Question 16:

*Should special provision to reduce the burdens on ancillary sellers be limited to specific types of business, and/or be available to all types of business providing they meet certain qualification criteria for limited or incidental sales? (Please select one option in each row):*

Answer Options	Yes	No	Don't know	Response Count
A) The provision should be limited to a specific list of certain types of business and the kinds of sales they make (see paragraph 9.5).	11	20	1	32
B) The provision should be available to all businesses providing they meet certain qualification criteria to be an ancillary seller (see paragraph 9.6).	7	23	1	31
C) The provision should be available to both a specific list of premises and more widely to organisations meeting the prescribed definition of an ancillary seller, that is, both options A and B.	9	22	2	33
<b>Answered Question</b>				<b>34</b>
<b>Skipped Question</b>				<b>46</b>



### Consultation Question 17:

*If special provision to reduce licensing burdens on ancillary sellers were to include a list of certain types of business, do you think it should apply to the following? (Please select one option in each row):*

Answer Options	Yes	No	Don't know	Response Count
A) Accommodation providers, providing alcohol alongside accommodation as part of the contract.	15	19	0	34
B) Hair and beauty salons, providing alcohol alongside a hair or beauty treatment.	15	19	0	34
C) Florists, providing alcohol alongside the purchase of flowers.	15	19	0	34
D) Cultural organisations, such as theatres, cinemas and museums, providing alcohol alongside cultural events as part of the entry ticket.	12	22	0	34
E) Regular charitable events, providing alcohol as part of the wider occasion	10	23	1	34
<b>Answered Question</b>				<b>34</b>
<b>Skipped Question</b>				<b>46</b>

### Consultation Question 18:

*Do you have any suggestions for other types of businesses to which such special provision could apply without impacting adversely on one or more of the licensing objectives (see glossary)? (Please write your suggestions in the box below, keeping your views to a maximum of 200 words):*

Split views on this question with some strong opinions both against and in support of proposals for Ancillary Sales. Those against consider that the sale of alcohol must remain regulated, and these proposals will simply provide loopholes and present more difficulties for regulators to achieve compliance, and others giving examples of very low key activities which they have had to step in and prevent because the 'complementary' alcohol would constitute a sale.

Some respondents stressed their views that the Licensing Act as it stands is a very workable piece of law, and that consistently changing bits of it is unhelpful to all parties.

### Consultation Question 19:

*The aim of a new 'ancillary seller' status is to reduce burdens on businesses where the sale of alcohol is only a small part of their business and occurs alongside the provision of a wider product or service, while minimising loopholes for irresponsible businesses and maintaining the effectiveness of enforcement (see paragraphs 9.2 and 9.3). Do you think that the qualification criteria proposed in paragraph 9.6 meet this aim? (Please select one option):*

Answer Options	Response Percent
YES	39.4%
NO	48.5%
Don't Know	12.1%

*If no, please describe the changes you would make in the box below (keeping your views to a maximum of 200 words).*

Responses concerned the difficulties of establishing the boundaries for ancillary sales and concern that the proposals would lead to loopholes, difficulties in regulation (increasing the burden on regulators) and be open to abuse.

Suggestions included given licensing authorities the power to charge lower fees for ancillary sales.

### Consultation Question 20:

*Do you think that these proposals would significantly reduce the burdens on ancillary sellers? (Please select one option in each row):*

Answer Options	Yes	No	Don't know	Response Count
A) Allow premises making ancillary sales to request in their premises licence application that the requirement for a personal licence holder be removed.	8	23	2	33
B) Introduce a new, light-touch form of authorisation for premises making ancillary sales - an 'ASN' but retain the need for a personal licence holder.	12	18	3	33
C) Introduce a new, light touch form of authorisation for premises making ancillary sales – an ASN - with no requirement for a personal licence holder.	12	20	1	33
<b>Answered Question</b>				<b>33</b>
<b>Skipped Question</b>				<b>47</b>

### Consultation Question 21:

*Do you think that the following proposals would impact adversely on one or more of the licensing objectives (see glossary)? (Please select one option in each row):*

Answer Options	Yes	No	Don't know	Response Count
A) Allow premises making ancillary sales to request in their premises licence application that the requirement for a personal licence holder be removed.	19	13	1	33
B) Introduce a new, light-touch form of authorisation for premises making ancillary sales - an 'ASN' but retain the need for a personal licence holder.	16	14	2	32
C) Introduce a new, light touch form of authorisation for premises making ancillary sales – an ASN - with no requirement for a personal licence holder.	16	14	2	32
<b>Answered Question</b>				<b>33</b>
<b>Skipped Question</b>				<b>47</b>

### Consultation Question 22:

*What other issues or options do you think should be considered when taking forward proposals for a lighter touch authorisation? (Please specify in the box below, keeping your views to a maximum of 200 words)?*

Suggestions included provision of a 'call in' process to enable licensing authorities to limit or remove the ability to sell alcohol if problems occur (with rights of appeal), a mandatory condition concerning age verification

Some concern that the proposals would have health implications by making alcohol provision even more widely available in an unregulated environment and in doing so removing any role for residents to voice their concerns. Also potential unintended consequences when pairing alcohol with for example beauty treatments.

Suggestions include a simpler form sent to licensing authority who could then consult RAs if considered necessary, removing requirement for DPS, and reduced fees.

Responses include a request to leave the law as it is, and a more radical suggestion to deregulate the Licensing Act completely with a call in (review) to enable licensing authorities to control establishments where there are problems as a result.

### Consultation Question 23:

Do you agree that licensing authorities should have the power to allow organisers of community events involving licensable activities to notify them through a locally determined notification process? (Please select one option):

Answer Options	Response Percent	Response Count
YES	35.5%	11
NO	64.5%	20
Don't Know	0.0%	0
<b>Answered Question</b>		<b>31</b>
<b>Skipped Question</b>		<b>49</b>

### Consultation Question 24:

What impact do you think a locally determined notification would have on organisers of community events? (Please select one option in each row):

Answer Options	Yes	No	Don't know	Response Count
A) Reduce the burden	15	12	2	29
B) Increase the burden	13	8	4	25
<b>Answered Question</b>				<b>32</b>
<b>Skipped Question</b>				<b>48</b>

The consultation proposes increasing the number of TENs which can be given from 12 to either 15 (an increase of 25%) or 18 (an increase of 50%).

### Consultation Question 25:

Should the number of TENs which can be given in respect of individual premises be increased? (Please select one option):

Answer Options	Response Percent	Response Count
YES	28.1%	9
NO	71.9%	23
Don't Know	0.0%	0
<b>Answered Question</b>		<b>32</b>
<b>Skipped Question</b>		<b>48</b>

### Consultation Question 26:

If yes, please select one option to indicate which you would prefer:

Answer Options	Response Percent	Response Count
15	11.1%	1
18	88.9%	8
Don't know	0.0%	0
<b>Answered Question</b>		<b>9</b>
<b>Skipped Question</b>		<b>71</b>

### Consultation Question 27:

Do you think that licensing authorities should have local discretion around late night refreshment in each of the following ways? (Please select one option in each row):

Answer Options	Yes	No	Don't know	Response Count
A) Determining that premises in certain areas are exempt.	7	25	0	32
B) Determining that certain premises types are exempt in their local area.	10	22	0	32
<b>Answered Question</b>				<b>32</b>

<i>Skipped Question</i>				<b>48</b>
<b>34. Consultation Question 28: Do you agree that motorway service areas should receive a nationally prescribed exemption from regulations for the provision of late night refreshment? (Please select one option):</b>				
<b>Answer Options</b>	<b>Yes</b>	<b>No</b>	<b>Don't know</b>	<b>Response Count</b>
A) Motorway service areas should receive a nationally prescribed exemption from regulations for the provision of late night refreshment.	21	7	4	32
<i>Answered Question</i>				<b>32</b>
<i>Skipped Question</i>				<b>48</b>

#### *Consultation Question 28:*

*Do you agree that motorway service areas should receive a nationally prescribed exemption from regulations for the provision of late night refreshment? (Please select one option):*

<b>Answer Options</b>	<b>Yes</b>	<b>No</b>	<b>Don't know</b>	<b>Response Count</b>
A) Motorway service areas should receive a nationally prescribed exemption from regulations for the provision of late night refreshment.	21	7	4	32
<i>Answered Question</i>				<b>32</b>
<i>Skipped Question</i>				<b>48</b>

#### *Consultation Question 29:*

*Please describe in the box below any other types of premises to which you think a nationally prescribed exemption should apply (keeping your views to a maximum of 100 words):*

Suggestions include hot drink vending machines and LNR from premises with a premises licence for other regulated activities, plus hotels and guest houses.

Other responses are very concerned at the proposal and point out that LNR venues can be a magnet for trouble in town and city centres late at night and to deregulate these would cause more regulatory problems.

### *Further proposals to reduce burdens on business*

#### *Consultation Question 30:*

*Do you agree with each of the following proposals? (Please select one option in each row):*

<b>Answer Options</b>	<b>Yes</b>	<b>No</b>	<b>Don't know</b>	
A) Remove requirements to advertise licensing applications in local newspapers.	21	11	0	
B) Remove the centrally imposed prohibition on the sale of alcohol at MSAs for the on and off-trade.	11	17	4	
C) Remove the centrally imposed prohibition on the sale of alcohol at MSAs but only in respect of overnight accommodation – “lodges”.	13	15	4	
D) Remove or simplify requirements to renew personal licences under the 2003 Act.	12	19	1	
<i>Answered Question</i>				
<i>Skipped Question</i>				

#### *Consultation Question 31:*

*Do you think that each of the following would reduce the overall burdens on business? (Please select one option in each row):*

<b>Answer Options</b>	<b>Yes</b>	<b>No</b>	<b>Don't know</b>	<b>Response Count</b>
A) Remove requirements to advertise licensing applications in local newspapers.	25	7	0	32

B) Remove the centrally imposed prohibition on the sale of alcohol at MSAs for the on and off-trade.	16	12	4	32
C) Remove the centrally imposed prohibition on the sale of alcohol at MSAs but only in respect of overnight accommodation – “lodges”.	14	14	4	32
D) Remove or simplify requirements to renew personal licences under the 2003 Act.	18	13	1	32
<b>Answered Question</b>				<b>32</b>
<b>Skipped Question</b>				<b>48</b>

### Consultation Question 32:

*Do you think that the following measures would impact adversely on one or more of the licensing objectives (see glossary)? (Please select one option in each row):*

Answer Options	Yes	No	Don't know	Response Count
A) Remove requirements to advertise licensing applications in local newspapers.	12	20	0	32
B) Remove the centrally imposed prohibition on the sale of alcohol at MSAs for the on and off-trade.	15	12	5	32
C) Remove the centrally imposed prohibition on the sale of alcohol at MSAs but only in respect of overnight accommodation – “lodges”.	9	19	4	32
D) Remove or simplify requirements to renew personal licences under the 2003 Act.	17	12	3	32
<b>Answered Question</b>				<b>32</b>
<b>Skipped Question</b>				<b>48</b>

### Consultation Question 33:

*In addition to the suggestions outlined above, what other sections of or processes under the 2003 Act could in your view be removed or simplified in order to impact favourably on businesses without undermining the statutory licensing objectives or significantly increasing burdens on licensing authorities? (Please specify in the box below keeping your views to a maximum of 200 words):*

Suggestions include:

- Provision for Responsible Authorities to attach licence conditions with the agreement of the licensee without the need for a hearing
- Power to revoke for non payment of annual fees
- Power to enforce licence conditions when no licensable activities are taking place
- Clarifying the position for garages – either allow or prohibit alcohol sales rather than leaving the current position as it currently stands which just causes unnecessary hearings and incurs legal costs for applicants.
- Simplification of forms

There are some concerns in relation to the proposal to remove the renewal requirement for personal licences. The current legislation fails where a PLH is convicted of a relevant offence and doesn't inform the courts of their PL, or when they do, the courts do not always inform the licensing authority.... The renewal process would provide the opportunity to update records and maintain / regain the standards that the licensing of PLH was (and presumably still is) in place to achieve.

The IoL asked members some specific questions around other areas of potential improvement concerning Summary Reviews, Ancillary Sales and Sales from garages. There were only a handful of responses but those responses are summarised below:

## Summary Reviews

Following the Gary Oates case (DJ decision that the interim steps fall at the review hearing and the subsequent review decision does not have effect until the determination of the appeal or the end of the appeal period). We also wanted to know if the procedure should be adjusted to allow the licence holder the opportunity to provide information to the licensing authority at the start of the process rather than having to wait to appeal the interim steps (potentially having been closed down initially).

## Responses

Of the responses, some endeavour to advise the licence holder already although the necessarily tight time scales do limit their capacity to respond, but if they can, their comments are considered by the licensing authority when considering the interim steps. If they cannot, the decision is taken without their submission rather than slowing up the process.

Another respondent (with direct knowledge of the Gary Oates case) considered that if there is time to let the licence holder know, then the position cannot be serious enough to warrant a summary review in the first place. A very strong view from this respondent that the Interim Steps remain until the end of the appeal period or until the appeal is determined as *'this is the very essence of the legislation and its intent was clearly shown at the end of the original Guidance'*. They also state: *'The system is now working far from well as no one knows, definitively, what the situation is with the whole Section. It may not be a binding decision but everyone is looking at it with a good degree of trepidation, especially local authorities who are anxious to avoid costs. Everyone at the Institute event in November (irrespective of which side of the argument they favoured) was in agreement that this whole issue should be clearly and definitively decided by Government once and for all.'*

## Conclusion

Clearly there are varying practices and some confusion about the position of interim steps on summary reviews which cannot be helpful to either businesses or regulators. It would seem to be a good opportunity and beneficial to all concerned to make the legislative process clear and effective for its intended purpose.

There is also a feeling that in some cases summary reviews are not used appropriately and instead may be viewed as a 'quick fix' on occasion. Partnership working as always seems to be the key to effectively addressing problems without the need for formal processes to be instigated.

## Alcohol licensing for Motorway Service Stations and Garage Forecourts

We asked members about their experience re the licensing of garages and whether they considered the current prohibition under Section 176 to be necessary. We also asked if they had experience problems as a result of garages licensed for the sale of alcohol.

Responses show no concerns re the licensing of garages although one suggestion was the use should include retail generally rather than just off-sales of alcohol. The current requirement to show primary use is often difficult, burdensome and seen as unnecessary and the removal of this requirement was supported by respondents.

## Ancillary Sales

The consultation document outlines proposals to introduce a low key process of authorisation for ancillary sales.

The aim of this section of the consultation is to reduce unnecessary business burdens so we asked members how many holiday homes, hairdressers, florists, beauty salons they currently licence and their views on a potential exemption for ancillary sales of this nature.

Comments in response to these questions included:

- We don't have any holiday homes but do licence a handful of florists and salons. I think the volume/type of alcohol sold needs to be assessed with this. If it's the occasional bottle of champagne with flowers from a florist, I'd de regulate. If it's a beauty salon that is permitted on sales of alcohol for 'hen' or 'stag' parties, I think it should stay licensable.
- I only have about 3/4 florists that have licences and these are all part of the Interflora Group. There used to be a handful of independent florists but they have all failed to renew when fees became due. (perhaps this is in itself an indication that there needs to be a more streamlined system to accommodate small users.
- There is a good case for reducing the (increasing) burden of legislation but removing the need for a PLH removes the need to state the name of the person responsible for the administration of the system, the person we would be looking to speak to if things went wrong. If the ASN route is taken, or indeed, whatever route is taken, that person should be clearly identified and the parameters should be clearly set out and not the usual 'woolly' worded enactments we have at present that are so open to misinterpretation or representation (Sec 53a as an example).
- In principal I would have no issue with such sale taking place but with my sceptical head on, I am concerned that this would be abused and there is little we could do to regulate it if it fell outside the regime. At what point does the sale stop being ancillary. I feel that the TEN provision is sufficient for this purpose and would strongly oppose any exemption.
- A possibility but more businesses would probably try to take advantage who maybe shouldn't.

## 10. Impact assessments

10.1 Impact assessments for the proposals in this consultation have been published alongside this document. Consultation respondents are encouraged to comment on these documents.

### Consultation Question 34:

*Do you think that the Impact Assessments related to the consultation provide an accurate representation of the costs and benefits of the proposals? (Please select one option in each row):*

Answer Options	Yes	No	Don't know	Response Count
A) Minimum unit pricing.	6	16	10	32
B) Multi-buy promotions.	7	15	10	32
C) Health as a licensing objective for cumulative impact.	6	17	9	32
D) Ancillary sales of alcohol.	5	17	10	32
E) Temporary Event Notices.	7	17	8	32
F) Late night refreshment.	7	17	8	32
G) Removing the duty to advertise licence applications in a local newspaper.	14	10	8	32
H) Sales of alcohol at motorway service stations.	11	10	10	31
I) Personal licences.	8	15	9	32
Answered Question				32
Skipped Question				48

### Consultation Question 35:

*Do you have any comments on the methodologies or assumptions used in the impact assessments? If so, please detail them, referencing clearly the impact assessment and page to which you refer.*

*If yes, please specify in the box below, referencing clearly the impact assessment and page to which you refer (keeping your views to a maximum of 400 words).*

Respondents consider that there are far too many assumptions on the one hand and other examples where the proposals appear not to have been properly considered. The proposals for removing the prohibition for MSAs in



relation to sales of alcohol risks sending out the wrong message bearing in mind that the only access to a MSA is in a vehicle.

## *Conclusion*

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This response summarises the responses submitted by IoL members to our online survey which replicates the consultation. A full copy of the survey report is attached for your information.

Members are concerned at a number of the proposals with varying views in many cases. In particular, the proposed MUP and the existing mandatory conditions are not supported, the introduction of a public health objective tied in with CIPs in their current form is a concern, and there are a number of concerns about proposals to deregulate any form of alcohol sales.

There is also a feeling that the constant amendments to the Licensing Act are unhelpful to both regulators and industry, leading to confusion and uncertainty.

The IoL considers that above all, it is essential that any changes are implemented in a way which is clear to all, and which can be complied with (or enforced if necessary) with confidence.

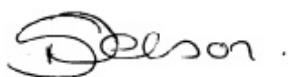
There are a number of areas within the consultation where it is clear what is being proposed or the way in which the proposal is intended to be implemented, for example the intended mechanics of introducing a public health objective, proposed amendments to the Mandatory Conditions etc., and we are aware that the Home Office have received other suggestions for areas to consider for change.

If further changes are proposed which are not fully examined in this consultation, we consider that further consultation should be undertaken to ensure that such proposals are given proper consideration in order to identify unintended consequences, and to ensure clarity for all concerned.

I hope this response is useful to you. As always, the Institute of Licensing would be happy to discuss these points in more detail and to work with the Home Office going forward with the proposals. In particular we are able to gather views from across the membership and through other contacts within the National Licensing Forum relatively easily and quickly should this be of assistance.

Please do not hesitate to contact me if you have any queries.

Yours faithfully,



Sue Nelson  
Executive Officer

**1. Which of the following best describes you or the professional interest you represent? Please select one box from the list below:**

AnswerOptions	ResponsePercent	ResponseCount
Individual involved in licensed trade/club premises	0.0%	0
Small or medium sized enterprise involved in licensed trade/club premises (up to 50 employees)	1.3%	1
Large business involved in licensed trade/club premises	0.0%	0
Small or medium sized enterprise involved in the production of alcohol (up to 50 employees)	0.0%	0
Business involved in the production of alcohol	0.0%	0
Trade body representing the licensed trade/club premises or alcohol producers	0.0%	0
Alcohol-related best practice scheme	0.0%	0
Person or organisation specialising in licensing law	9.0%	7
Voluntary and community organisation	0.0%	0
Licensing authority	11.5%	9
Licensing authority officer	53.8%	42
Public health body (e.g. Primary Care Trust, Local Health Board, Director of Public Health)	0.0%	0
Local Government (other)	5.1%	4
Police and crime commissioner	0.0%	0
Police force	6.4%	5
Police officer	9.0%	7
Bodies representing public sector professionals (eg. Local Government Association, Institute of Licensing)	0.0%	0
Central Government	0.0%	0
Member of the public	3.8%	3
Other (please specify)		3
<b>AnsweredQuestion</b>		<b>78</b>
<b>SkippedQuestion</b>		<b>2</b>

Number	Response Date	Other (please specify)	Categories
1	Jan 24, 2013 2:02 PM	Trading Standards	
2	Jan 24, 2013 8:13 AM	Police Licensing Officer	
3	Jan 24, 2013 8:06 AM	Member of licensing	

**5. Please select one box from the list below that best describes where you live or where your organisation is based:**

AnswerOptions	ResponsePercent	ResponseCount
North East England	2.6%	2
North West England	9.2%	7
South East England	17.1%	13
Yorkshire and the Humber	7.9%	6
West Midlands	7.9%	6
East Midlands	11.8%	9
East of England	6.6%	5
South West England	15.8%	12
London	10.5%	8
Wales	10.5%	8
Scotland	0.0%	0
Northern Ireland	0.0%	0
European Union	0.0%	0
Rest of the world	0.0%	0
<b>AnsweredQuestion</b>		<b>76</b>
<b>SkippedQuestion</b>		<b>4</b>

**7. 5.8 The Government wants to ensure that the chosen minimum unit price level is targeted and proportionate, whilst achieving a significant reduction of harm.**

AnswerOptions	ResponsePercent	ResponseCount
YES	22.4%	11
NO	63.3%	31
DON'T KNOW	14.3%	7
If you think another level would be preferable, please set out your views on why this might be in the box below (keeping your views to a maximum of 200 words)		11
<b>AnsweredQuestion</b>		<b>49</b>
<b>SkippedQuestion</b>		<b>31</b>

Number	Response Date	If you think another level would be preferable, please set out your views on why this might be in the box below (keeping your views to a maximum of 200 words).	Categories
1	Jan 30, 2013 9:28 AM	I do not see this proposal as workable or likely to have the desired effect	disagrees
2	Jan 30, 2013 9:18 AM	Totally disagree there should be a minimum price. It punishes moderate drinkers and will lead to increased dug usage instead. I would prefer a 50p MUP. This keeps the whole UK in line and clearly has a greater impact than 45p. I don't feel that a reasonable (50p) minimum price is a problem to the ordinary person. It will only affect those who buy the very cheapest alcohol at the very bottom end of the market AND in buy in relatively bulk quantities!	disagrees
3	Jan 27, 2013 12:53 PM	At these levels, the proposed increase in costs is unlikely to dissuade those most at risk.	higher MUP
4	Jan 24, 2013 4:34 PM	The research and other evidence on minimum unit pricing suggest that a rate higher than 45p would lead to significantly more health and social benefits. For example, it has been estimated that a 50p rate would result in a 6.9% reduction in alcohol consumption, compared to a 4.5% reduction from a 45p rate. In terms of health outcomes the 50p 'MUP' would therefore lead to 2,930 fewer deaths per year after ten years, compared with the government's estimate (above) of 714 fewer from a 45p MUP.  A higher MUP might also encourage alcohol producers to reduce the strength of alcoholic beverages. Consumers may not notice this, but if their spending remains constant they would be consuming less alcohol.	higher MUP
5	Jan 24, 2013 11:45 AM	It might be wise to wait and see how this policy works in Scotland. MUP will only 'punish' those people who are alcohol dependant and put (unfunded) pressures on	higher MUP
6	Jan 24, 2013 10:23 AM	alcohol counselling units. The research carried out in Scotland would tend to indicate that the greater the price the more impact	disagrees
7	Jan 24, 2013 10:22 AM	it has on the effect on sales and therefore alcohol related crime. I fear that this will increase the offer on the black market, increase counterfeit products and lead street drinkers to cheaper alternatives. Recent Vodka and Wine was seize in Bournemouth. The impact on the	higher MUP
8	Jan 24, 2013 9:09 AM	Health Service as a result may be significant. Controls on the number outlets would probably achieve more positive results i.e. fewer premises	disagrees
9	Jan 24, 2013 8:45 AM	allowed to sell alcohol	agrees
10	Jan 24, 2013 7:47 AM	I do not think minimum pricing is the answer. Doubling the price for the minimum would be a more appropriate step. However, rather than tax it,	disagrees
11	Dec 10, 2012 10:06 AM	the extra proceeds should be split between retailer and producer.	higher MUP

**8. Consultation Question 2: Should other factors or evidence be considered when setting a minimum unit price for alcohol? (Please select one option):**

AnswerOptions	ResponsePercent	ResponseCount
YES	29.2%	14
NO	35.4%	17
DON'T KNOW	35.4%	17
If yes, then please specify these in the box below (keeping your views to a maximum of 200 words).		12
<b>AnsweredQuestion</b>		<b>48</b>
<b>SkippedQuestion</b>		<b>32</b>

Number	Response Date	If yes, then please specify these in the box below (keeping your views to a maximum of 200 words).	Categories
1	Jan 30, 2013 12:02 PM	Alcohol is an addiction for many people. Addicts are not concerned with price. Preloading is a problem, but as long as off-licence alcohol is cheaper than on-licence alcohol it will continue, and 45p per unit will not change that. What research has been done with young people about pre-loading? Ultimately it is a matter of personal responsibility, and legislation is a poor method of altering public behaviour. Extra money made should go towards education & enforcement re alcohol misuse/underage sales &	
2	Jan 25, 2013 11:49 AM	dealing with street drinkers. Extra money received should be used for education and enforcement on age related sales. Govt should	
3	Jan 25, 2013 11:32 AM	also reduce the amount of advertising for alcohol Has the increase in price of tobacco, in isolation, made a significant impact on tobacco consumption? What evidence is available? What evidence is there as to the availability of non-duty paid alcohol and illegal/fake alcohol? In my view, a minimum price will encourage the prevalence of these, especially in	
4	Jan 24, 2013 4:34 PM	areas with easy links to mainland Europe. Greater investment is needed in work with those that are physically dependant on alcohol as they would be affected by this legislation and may need additional support. Alcohol theft and other associated crimes might become an issue of concern. A side effect might be a reduction in pre loading and going to the town centre pubs at an earlier stage in the evening.	
5	Jan 24, 2013 11:45 AM	minimum unit pricing should be imposed on both the on trade as well as the off sale trade.	
6	Jan 24, 2013 10:23 AM	BEFORE setting MUP, controls should be implemented in supermarkets to stop alcohol displays being at every corner. Alcohol should be displayed in designated areas with prior approval of the LA	
7	Jan 24, 2013 9:46 AM	firm evidence from other places where this has been utilised to support the projected figures Until the Scottish Challenge has been resolved, I do not see the point in pursuing this matter further at	
8	Jan 24, 2013 9:37 AM	this time. Controls on the number outlets would probably achieve more positive results i.e. fewer premises	
9	Jan 24, 2013 8:45 AM	allowed to sell alcohol	
10	Jan 24, 2013 8:15 AM	Police crime statistics regarding any matters that are alcohol related Potential increase in crime - theft of alcohol from shops etc due to users not being able to afford cheap	
11	Jan 24, 2013 1:30 AM	alcohol anymore and a demand created generally for stolen alcohol.	
12	Dec 10, 2012 2:07 PM	Yes - it should be considered that the Licensing Industry believes it is a waste of time and that the EU believes it is illegal.	

**9. 5.9 The Government wishes to maintain the effectiveness of minimum unit pricing and is therefore proposing to adjust the minimum unit price level over time.**

<b>AnswerOptions</b>	<b>ResponsePercent</b>	<b>ResponseCount</b>
Do nothing – the minimum unit price should not be	4.4%	2
The minimum unit price should be automatically	31.1%	14
The minimum unit price should be reviewed after a set	57.8%	26
Don't know.	6.7%	3
Comments		8
<b>AnsweredQuestion</b>		<b>45</b>
<b>SkippedQuestion</b>		<b>35</b>

<b>Number</b>	<b>Response Date</b>	<b>Comments</b>	<b>Categories</b>
		The review should not only consider the MUP in accordance with inflation, but also evidence of the	
1	Jan 30, 2013 12:02 PM	success or otherwise of the scheme.	
2	Jan 30, 2013 9:18 AM	I do not agree with the principle of a minimum price.	
3	Jan 29, 2013 2:40 PM	And this should be reviewed after a set period as well.	
4	Jan 24, 2013 11:45 AM	It should be reviewed after a set period and also updated in line with inflation.	
5	Jan 24, 2013 9:09 AM	If it is introduced then there must be some method so why not inflation.	
6	Jan 24, 2013 7:47 AM	There should not be a minimum price.	
7	Dec 10, 2012 2:07 PM	The Minimum Price Unit should not be introduced.	
8	Dec 10, 2012 11:06 AM	A review should take place to measure the affect following introduction.	

**10. Consultation Question 4: The aim of minimum unit pricing is to reduce the consumption of harmful<sup>13</sup> and hazardous<sup>14</sup> drinkers, while minimising the impact on responsible<sup>15</sup> drinkers. Do you think that there are any other people, organisations or groups that could be particularly affected by a minimum unit price for alcohol? (Please select one option):**

AnswerOptions	ResponsePercent	ResponseCount
YES	34.8%	16
NO	39.1%	18
Don't know.	26.1%	12
If Yes please specify in the box below (keeping your views to a maximum of 100 words).		17
<b>AnsweredQuestion</b>		<b>46</b>
<b>SkippedQuestion</b>		<b>34</b>

Number	Response Date	If Yes please specify in the box below (keeping your views to a maximum of 100 words).	Categories
1	Jan 30, 2013 12:02 PM	The very low paid, those on benefits etc. Is it fair to penalise sensible, but poor people?	
2	Jan 30, 2013 9:18 AM	responsible drinkers	
3	Jan 30, 2013 8:58 AM	Responsible drinkers will be affected with higher prices.	
4	Jan 30, 2013 8:38 AM	health, drinks industry, Setting a minimum price will I believe create an additional burden on other authorities for example the illegal importation of cheaper alcohol from Europe will increase. This will shift the burden onto the Ports and Police to deal with the increase in criminality. There will always be a supplier for the demand	
5	Jan 25, 2013 11:54 AM	for cheap alcohol.	
6	Jan 25, 2013 11:49 AM	Retailers . More people will go abroad for buy alcohol.	
7	Jan 25, 2013 11:32 AM	Retailers, as people are likely to go abroad to buy cheaper alcohol Those on limited or fixed incomes whoc are responsible drinkers; community social events where	
8	Jan 24, 2013 4:34 PM	alcohol is made available. The impact on dependant drinkers needs to be considered and to ensure that adequate treatment provision is available. It may also have an impact on those going into the night time economy at an earlier stage.	
9	Jan 24, 2013 11:45 AM	minimum unit pricing should also effect on sale as well as off sale trade.	
10	Jan 24, 2013 10:45 AM	I think it will be more likely to affect those in low income groups	
11	Jan 24, 2013 10:23 AM	see above - 3 ltrs strong cider now retailing in an 'off' licence at £3.99 will be over £10.00	
12	Jan 24, 2013 9:21 AM	everyone who purchases alcohol will be affected	
13	Jan 24, 2013 9:09 AM	What I would say is that people that are determined to drink, pre-load will continue to purchase alcohol no matter what price. I dread to think what the alternative drink for street drinkers will be? The general public who do not fall into the above who purchase alcohol in moderation will pay more for the products or not purchase. This in turn could effect both shops and brewers who may suffer from poorer sales and in the end the Governemnt will suffer through lack of tax income. Those who	
14	Jan 24, 2013 8:45 AM	want to drink to excess will still find the money to do so.	
15	Jan 24, 2013 1:30 AM	alcoholics, poorer sections of society, young people Yes. Responsible, moderate alcohol drinkers will be particularly affected by having their finances squeezed	
16	Dec 10, 2012 2:07 PM	even further by this hair-brained scheme.	
17	Dec 10, 2012 11:06 AM	The industry	



**11. Consultation Question 5: Do you think there should be a ban on multi-buy promotions involving alcohol in the off-trade? (Please select one option):**

AnswerOptions	ResponsePercent	ResponseCount
YES	46.3%	19
NO	51.2%	21
Don't Know	2.4%	1
<b>AnsweredQuestion</b>		<b>41</b>
<b>SkippedQuestion</b>		<b>39</b>

**12. Consultation Question 6: Are there any further offers which should be included in a ban on multi-buy promotions? (Please select one option):**

AnswerOptions	ResponsePercent	ResponseCount
YES	10.3%	4
NO	61.5%	24
Don't Know	28.2%	11
If yes, please specify in the box below (keeping your views to a maximum of 100 words).		6
<b>AnsweredQuestion</b>		<b>39</b>
<b>SkippedQuestion</b>		<b>41</b>

Number	Response Date	If yes, please specify in the box below (keeping your views to a maximum of 100 words).	Categories
1	Jan 30, 2013 9:20 AM	There should be no ban on multi buy promotions	
2	Jan 29, 2013 9:52 AM	I think there should be a ban on all off-trade selling any alcohol at a promotional price.	
3	Jan 24, 2013 4:41 PM	Apply the rules for "sales" promotions (not sold at the low price in any of the firm's outlets in the last 28 days) to the multipack where it is not at that time available as individual items.	
4	Jan 24, 2013 11:48 AM	Concern is raised over alcohol being included in other deals as a loss leader (eg meal for ten pounds that includes a bottle of wine) and hiding the cost of alcohol. It would be sensible to consider the role of the media within this and to restrict the role of alcohol advertising on TV.	
5	Jan 24, 2013 10:26 AM	I fail to understand the difference between 1/3 off and three for the price of one if such offers are the driver for sales, any discount it seems to me will impact upon the intentions of MUP. Other offers such as alcohol as part of a promotion for non alcohol products should also be considered.	
6	Jan 24, 2013 8:49 AM	The "responsible drinks promotion " embedded conditions should be reviewed in order for it to be able to be effectively enforced.	

**13. Consultation Question 7: Should other factors or evidence be considered when considering a ban on multi-buy promotions? (Please select one option):**

AnswerOptions	ResponsePercent	ResponseCount
YES	18.4%	7
NO	50.0%	19
Don't Know	31.6%	12
If yes, please specify in the box below (keeping your views to a maximum of 200 words).		10
<b>AnsweredQuestion</b>		<b>38</b>
<b>SkippedQuestion</b>		<b>42</b>

Number	Response Date	If yes, please specify in the box below (keeping your views to a maximum of 200 words).	Categories
		Yes. What evidence is there that multibuy promotions increase alcohol consumption? Again, does it simply penalise the prudent who buy their alcohol when it is cheaper and then save it, drinking sensibly?	
1	Jan 30, 2013 12:10 PM		
2	Jan 30, 2013 9:20 AM	There should be no ban on multi buy promotions	
		That pubs, social clubs and private members clubs like the British Legion are dying out and they have a value to the community. Also that the pub group business model (Punch, Enterprise etc) by charging tenants such high costs mean they are unable to compete with supermarket prices.	
3	Jan 29, 2013 9:52 AM	The vast majority of shoppers are sensible drinkers so why should the Government dictate to these people and prevent them from purchasing at a discount.	
4	Jan 25, 2013 10:33 AM	It is difficult to attribute crime and disorder to the actions that are being suggested; wider geographical issues also contribute and make it harder to link with specific premises.	
5	Jan 24, 2013 11:48 AM	Selling single items at a cheaper rate is a potential issue that could affect multi-buy promotions.	
6	Jan 24, 2013 10:50 AM	Whether it is legal in terms of trade law	
7	Jan 24, 2013 10:23 AM	se earlier comment about display areas in larger stores	
8	Jan 24, 2013 8:49 AM	Target those retailers that use this form of marketing sometimes as a "loss leader" to encourage customers to make purchases i.e. large supermarket chains.	
9	Dec 10, 2012 2:10 PM	The effect on responsible, moderate drinkers whose finances are already being squeezed by the misguided policies of this wretched government.	
10	Dec 10, 2012 11:08 AM	Consumer choice	

14. Consultation Question 8: The aim of a ban on multi-buy promotions is to stop promotions that encourage people to buy more than they otherwise would, helping people			
AnswerOptions	ResponsePercent	ResponseCount	
YES	35.0%	14	
NO	42.5%	17	
Don't Know	22.5%	9	
If yes please specify in the box below (keeping your views to a maximum of 100 words).			15
<b>AnsweredQuestion</b>			<b>40</b>
<b>SkippedQuestion</b>			<b>40</b>

Number	Response Date	If yes please specify in the box below (keeping your views to a maximum of 100 words).	Categories
1	Jan 30, 2013 12:10 PM	It will affect everyone. small independant retailers, stock rotation promotions are necessary part of the retail business especially at the small to medium end. some short shelf life beers would therefore not be stocked and	
2	Jan 30, 2013 10:06 AM	have a knock on effect to independent brewers. Responsible drinkers who are not buying more than they otherwise would but are simply saving money	
3	Jan 30, 2013 9:20 AM	at the time of buying to spead alcohol consumption over a longer period.	
4	Jan 30, 2013 9:01 AM	Responsible drinkers would be affected with higher prices.	
5	Jan 30, 2013 8:20 AM	ALL PREMISES WHO SELL ALCOHOL SHOULD BE EFFECTED ACROSS THE WHOLE SPECTRAM Whilst appearing to address the problematic drinkers, it should be borne in mind that also affects the	
6	Jan 25, 2013 12:03 PM	majority who drink responsibly.	
7	Jan 25, 2013 11:50 AM	Retailers . More people will go abroad for buy alcohol. Possibly local community groups looking to supply a social event and make a return for the	
8	Jan 24, 2013 4:41 PM	organisation. It could be taken as this being the Nanny state in action and this needs to be considered, however in terms of preventing irresponsible crime and disorder then this will have a benefit to the wider area.	
9	Jan 24, 2013 11:48 AM	No other known groups are affected.	
10	Jan 24, 2013 10:50 AM	moderate drinkers would be caught - ie those that would be responsible in their consumption	
11	Jan 24, 2013 9:22 AM	everyone will be affected People who wish to buy a good wine in bulk for consumption over a number of months, not merely to	
12	Jan 24, 2013 9:12 AM	consume it that night.  The public will suffer when/if prices rise. In banning two for one offers but not banning half price offers I fail to see what impact it will have. Large supermarkets will find ways around the ban, mainly by ensuring that products sold on multi buys will not be the same as those sold singly, i.e they will sell	
13	Jan 24, 2013 8:53 AM	300ml in multi buys and 330ml in singles and therefore part of the proposal is flawed. It punishes responsible drinkers. Irresponsible drinkers will still buy the alcohol no matter what price it	
14	Jan 24, 2013 7:52 AM	is.	
15	Dec 10, 2012 2:10 PM	(See above).	

**15. Consultation Question 9: Do you think each of the mandatory licensing conditions is effective in promoting the licensing objectives (crime prevention / public safety /****Prevention of crime & disorder**

<b>AnswerOptions</b>	<b>Yes</b>	<b>No</b>	<b>Don't know</b>	<b>ResponseCount</b>
A. Irresponsible promotions (see condition i above)	17	22	0	39
B. Dispensing alcohol directly into the mouth (see	22	12	5	39
C. Mandatory provision of free tap water (see	16	20	3	39
D. Age verification policy (see condition iv above)	32	6	1	39
E. Mandatory provision of small measures (see	16	21	2	39

**Public safety**

<b>AnswerOptions</b>	<b>Yes</b>	<b>No</b>	<b>Don't know</b>	<b>ResponseCount</b>
A. Irresponsible promotions (see condition i above)	17	21	1	39
B. Dispensing alcohol directly into the mouth (see	24	11	3	38
C. Mandatory provision of free tap water (see	23	12	3	38
D. Age verification policy (see condition iv above)	23	13	2	38
E. Mandatory provision of small measures (see	16	18	4	38

**Prevention of public nuisance**

<b>AnswerOptions</b>	<b>Yes</b>	<b>No</b>	<b>Don't know</b>	<b>ResponseCount</b>
A. Irresponsible promotions (see condition i above)	17	20	1	38
B. Dispensing alcohol directly into the mouth (see	18	15	4	37
C. Mandatory provision of free tap water (see	14	20	4	38
D. Age verification policy (see condition iv above)	25	11	2	38
E. Mandatory provision of small measures (see	14	20	4	38

**Protection of children from harm**

<b>AnswerOptions</b>	<b>Yes</b>	<b>No</b>	<b>Don't know</b>	<b>ResponseCount</b>
A. Irresponsible promotions (see condition i above)	14	24	0	38
B. Dispensing alcohol directly into the mouth (see	13	19	5	37
C. Mandatory provision of free tap water (see	11	21	6	38
D. Age verification policy (see condition iv above)	31	6	1	38
E. Mandatory provision of small measures (see	9	26	3	38

				<b>Question Totals</b>
<b>AnsweredQuestion</b>				<b>39</b>
<b>SkippedQuestion</b>				<b>41</b>

**16. Consultation Question 10: Do you think that the mandatory licensing conditions do enough to target irresponsible promotions in pubs and clubs? (Please select one option):**

AnswerOptions	ResponsePercent	ResponseCount
YES	42.1%	16
NO	50.0%	19
Don't Know	7.9%	3
If no, please state what more could be done in the box below (keeping your views to a maximum of 100 words).		14
<b>AnsweredQuestion</b>		<b>38</b>
<b>SkippedQuestion</b>		<b>42</b>

Number	Response Date	If no, please state what more could be done in the box below (keeping your views to a maximum of 100 words).	Categories
1	Jan 30, 2013 8:19 PM	NON SPECIFIC WITH PREMISES, INSUFFICIENT ENFORCEMENT BY OPERATORS WITH EVER GREATER PRESSURE ON POLICE AND LOCAL AUTHORITIES TO MONITOR AND ENFORCE.	
2	Jan 29, 2013 2:51 PM	Not restrictive enough - alcohol can still be at a low price with no promotion.	
3	Jan 27, 2013 1:00 PM	This needs simplification and beefing up. Too many promotions that encourage irresponsible drinking do not fall under this condition.	
4	Jan 25, 2013 12:13 PM	No, it is open to interpretation, offers no guidance as to what constitutes an irresponsible promotion and it's usually operated by big multi-chains who have more money to challenge through the courts any decision by a licensing authority as to what is or is not irresponsible. My authority have decided that a promotion was irresponsible whilst the police decided it was not!	
5	Jan 24, 2013 4:58 PM	Redefine the evidential requirement which requires proof that the promotion is for the "purpose of encouraging the sale or supply of alcohol for consumption on the premises in a manner which carries a significant risk of leading or contributing to crime and disorder, prejudice to public safety, public nuisance, or harm to children". This does not prevent such promotions and does not give rise to anything actionable unless it can be proven that the crime and disorder, public safety or protection of children from harm objectives were engaged, which, in my experience, is effectively impossible.	
6	Jan 24, 2013 12:24 PM	no one really understands what is an irresponsible promotion, as it has never really been tested or defined. total waste of ink on every licence.	
7	Jan 24, 2013 11:52 AM	They should not need to demonstrate the link between crime and disorder and the promotions. Up selling of drinks should be discouraged / prevented. A mandatory provision of small measures should also be introduced.	
8	Jan 24, 2013 11:05 AM	The condition as it currently stands means that there has to be evidence that there are consequences to the promotion - ie that crime and disorder is caused by it. That is difficult to achieve. Our borough took a prosecution for this and therefore realised the difficulty in this respect. The prosecution failed on a technicality because the venue had closed by the time the matter went to court, but it would have been simpler if the condition was worded so that free bars or all inclusive drinks promotions were prohibited regardless of whether there was evidence of crimes committed as a result.	
9	Jan 24, 2013 10:26 AM	There appears to be no enforcement of the existing mandatory conditions	

- They are wide open to interpretation as they are very subjective and I am not aware of any challenges being brought through the courts that may bring clarity.
- 10 Jan 24, 2013 10:21 AM** The condition requiring an age verification policy is not effective as all it does is replicate the due diligence defence. Had it have been set at 21 or 25 it may have provided a useful tool to drive up compliance reates in respect of underage sales. Do not forget the off trade!
- 11 Jan 24, 2013 9:22 AM** A default position should be small measure, not "do you want to go large?"
- 12 Jan 24, 2013 8:53 AM** The conditions should be written in "plain English" in order they can be enforceable.
- 13 Jan 24, 2013 8:19 AM** Too vague and need to be more specific in detail
- 14 Jan 24, 2013 1:39 AM** Because often there is the additional onus to indicate an evidential link between the disorder and the promotion

17. Consultation Question 11: Are there other issues related to the licensing objectives (prevention of crime and disorder / public safety / prevention of public nuisance / protection of			
AnswerOptions	ResponsePercent	ResponseCount	
YES	26.3%	10	
NO	44.7%	17	
Don't Know	28.9%	11	
If yes, please specify in the box below (keeping your views to a maximum of 200 words).			8
			<b>AnsweredQuestion</b> <b>38</b>
			<b>SkippedQuestion</b> <b>42</b>

Number	Response Date	If yes, please specify in the box below (keeping your views to a maximum of 200 words).	Categories
1	Jan 29, 2013 2:51 PM	All premises should be required to demonstrate they have carried out staff training regarding the Licensing Act 2003 and the offences relevant to staff selling alcohol - this should be documented and regularly reiterated and reviewed.	
2	Jan 27, 2013 1:00 PM	Make challenge 25 not only mandatory, but also include a provision for ID verification.	
3	Jan 24, 2013 4:58 PM	Require a mandatory challenge 21 (or challenge 25) policy, not the current challenge 18 requirement (D). Those serving struggle to identify under 18s, have more success with under 21s and are almost universally successful with under 25s.	
4	Jan 24, 2013 11:52 AM	Age verification polices should written and verified as part of the mandatory licensing conditions.	
5	Jan 24, 2013 9:22 AM	The conditions must be enforceable, must be enforced and must be unambiguous. Why is it only a Police officer who can say that you are drunk, I think I know when someone is drunk, why not develop a simple test that enforcement officers can apply, I don't know, something similar to America, walk the yellow line and turn around, close your eyes and stand on one leg. I realise the difficulty is the right to ask someone to take the test.	
6	Jan 24, 2013 9:06 AM	It would be good to investigate how Pub Watch could be introduce as mandatory condition as pub watch themselves are not statutory bodies. Pub Watch is a vital tool and those who do participate play a vital role in making communities safer.	
7	Jan 24, 2013 8:19 AM	I feel it is something worth investigating if the problem of pub watches not being a statutory body can be over come.	
8	Jan 24, 2013 1:39 AM	Minimum age regarding point of sale for seller Mandatory breathalising for customers on premises to indicate their level of alcohol intake and should not be allowed into premises if it is high amount of alcohol.	



**18. Consultation Question 12: Do you think the current approach, with five mandatory licensing conditions applying to the on-trade and only one of those to the off-trade, is appropriate? (Please select one option):**

AnswerOptions	ResponsePercent	ResponseCount
YES	35.1%	13
NO	59.5%	22
Don't Know	5.4%	2
If no, please explain why you think the current approach is not the best approach in the box below (keeping your views to a maximum of 100 words).		15
<b>AnsweredQuestion</b>		<b>37</b>
<b>SkippedQuestion</b>		<b>43</b>

Number	Response Date	If no, please explain why you think the current approach is not the best approach in the box below (keeping your views to a maximum of 100 words).	Categories
1	Jan 30, 2013 12:14 PM	As 4 of the conditions are largely pointless (excepting free water) they cannot be appropriate.	
2	Jan 30, 2013 9:05 AM	This is not a equal approach, the same number of mandatory conditions should apply to both trades.	
3	Jan 30, 2013 8:24 AM	THE SAME MANDATORY CONDITIONS SHOULD APPLY TO EVERY PREMISE SELLING ALCOHOL. THE OFF TRADE ARE THE WORST TO FLOUT THE LAW.	
4	Jan 29, 2013 9:56 AM	The number of people purchasing alcohol in pubs and clubs is rapidly decreasing whilst the alcohol purchases in the off trade are increasing. Just focusing on the on trade is a mistake. The supermarkets cause far more damage yet are left alone as they donate to political parties and are large employers	
5	Jan 27, 2013 1:00 PM	The current position places the blame at the door of the on trade, but there is actually far more that should be directed at the off trade, particularly large supermarkets with massive influence and buying power.	
6	Jan 24, 2013 4:58 PM	It is successful in part (C and D) which are easy to understand and measurable. A is a nightmare, B is mostly unenforceable and D better addressed through consumer protection legislation.	
7	Jan 24, 2013 12:24 PM	The DPS very rarely reads them!	
8	Jan 24, 2013 11:52 AM	These are not specifically appropriate for the off trade and need to address this area specifically. minimum unit pricing also need to be addressed within this context.	
9	Jan 24, 2013 11:26 AM	There are as many problems caused by off sales so some mandatory restrictions in this area could be useful.	
10	Jan 24, 2013 11:05 AM	I think that licences should mirror the Gambling Act premises licences, with mandatory and default conditions tailored to the type of business. The off trade are the cause of most of our enforcement work because there is widespread lack of understanding of the principles that need to be applied to ensure responsible retailing. All too often we find individuals responsible for the sale of alcohol who have had no training, speak very little English which must cause difficulties in effectively challenging customers who may be underage, and the authorisation of sales consists of a scrap of paper written by the DPS who is rarely seen. In my view comprehensive and robust conditions for off licences are needed along the lines of the due diligence guidelines issued by Trading Standards.	
11	Jan 24, 2013 10:26 AM	see earlier comments about too 'open' display of alcohol in larger stores	

- |           |                             |  |
|-----------|-----------------------------|--|
| <b>12</b> | <b>Jan 24, 2013 9:06 AM</b> | In my view the mandatory conditions have had little or no effect on the on trade which is already well regulated. The off  |
| <b>13</b> | <b>Jan 24, 2013 8:53 AM</b> | trade on the the other hand is where most drink problems arising do to pre loading.<br>All conditions should be written in "plain English" in order they can be enforceable.         |
| <b>14</b> | <b>Jan 24, 2013 7:55 AM</b> | There is too many mandatory conditions. The law is fine as it is. Current laws and policies should be enforced i.e. serving  |
| <b>15</b> | <b>Jan 24, 2013 1:39 AM</b> | to people who are already drunk, banning offenders from all licensed premises for lengthy periods.<br>There should be more emphasis on conditions for off trade as well as on trade. |

19. Consultation Question 13: What sources of evidence on alcohol-related health harm could be used to support the introduction of a cumulative impact policy (CIP) if it were possible		
AnswerOptions	ResponseCount	
	28	
<i>AnsweredQuestion</i>		28
<i>SkippedQuestion</i>		52

Number	Response Date	Response Text
2	Jan 30, 2013 12:30 PM	This question is hard to answer. As I do not believe the concept of a CIP as currently used is lawful anyway, as it is not contained in the legislation, but introduced by Guidance, it is hard to say how an unlawful prcess can be usefully altered.
3	Jan 30, 2013 9:33 AM	I cannot think of a source of evidence that would be area specific enough to satisfy any evidential test
4	Jan 30, 2013 9:23 AM	Impossible to take health into account - silly idea
8	Jan 29, 2013 10:12 AM	This is a silly idea. Statistics are regularly manipulated by the Police who already use the licensing act to manipulate licensees to run their businesses to suit their budgets/policing levels. Also supermarkets cause enormous damage to health not only with their selling of alcohol at cost but also their considerable amount of junk food promotions, yet they are left alone. Also statistics would mean that areas like the Gorbels in Glasgow would end up with no pubs! Under the old licensing act a prospective new business had to prove there was a "need" before they could be granted a new licence. A previous government removed that provision which led to an explosion of licences. That was a huge error which cannot be resolved with more ill thought out legislation.
9	Jan 28, 2013 11:41 AM	not aware of any - too remote
15	Jan 24, 2013 11:55 AM	Health should become a 5th licensing objective rather than an extra add on as part of CIP, which is a specific policy that is only used by a minority of Local Authorities. Health should be able to take on board alcohol related harms in a more general sense, rather than this being limited to just the CIP.
19	Jan 24, 2013 10:29 AM	Surely impossible to link any evidence directly to an individaul application and the objective will only ead to an increase in appeals. Seems to be a back door way of introducing a need to prove 'need' .
21	Jan 24, 2013 9:29 AM	Difficult, difficult, difficcult! I can foresee Health Autorities objecting to any new licence in an area where alcohol related health issue prevail, If you prevent sales within the area then people will have home delivery from the supermarkets from outside the area. If someone is determined to drink they will.
23	Jan 24, 2013 8:55 AM	The Health Authorities should have more input and there should be a licensing objective directly related to them.
25	Jan 24, 2013 8:01 AM	I do not think CIP's are effective. We have one in my area and intelligent applicants can always get around the presumption with careful wording. Once the licence is obtained the CIP has no effect.
1	Jan 30, 2013 8:21 PM	CURRENTLY NOT RECEIVEING EVIDENCE FORM ANY SOURCE.
12	Jan 24, 2013 5:12 PM	Don't know
14	Jan 24, 2013 12:25 PM	difficult as we do not have an A & E in our area to get any meaningful figures
27	Dec 10, 2012 2:13 PM	Don't Know
5	Jan 30, 2013 9:08 AM	Statistical figures provided by the health board including those who have had suffered and injuary due to an alcohol related accident or violence.
6	Jan 30, 2013 8:26 AM	IF PRICES WERE HIGHER ON ALL ALCOHOL LESS PEOPLE COULD AFFORD TO SPEND AND THEIR HEALTH MONITORED BETTER
7	Jan 29, 2013 2:55 PM	Figures from the local Accident and Emergency Department Other information that could be provided by a local authority drug action team

		Street drinker numbers (from local shelters/charities)
		Admissions for acute and chronic alcoholism at the local hospital.
10	Jan 27, 2013 2:10 PM	Data from GPs about their treatment and referrals of alcoholic and chronic drinkers.
11	Jan 25, 2013 12:05 PM	Accident & emergency data on people picked up from licenced premises or where they had their last drink.
		Detailed A&E evidence identifying individual premises, numbers of persons affected and severity of the symptoms presented. Practically, it is unlikely to happen, given the resources needed to provide it. General opinion on the “evils of drink” and high-level statistical evidence is of little use in dealing with individual applications or reviews.
13	Jan 24, 2013 5:06 PM	Hospitals recording where people have consumed alcohol on admission which could be fed back to licensing authorities to allow mapping of areas with high incidents of hospital admissions through alcohol.
16	Jan 24, 2013 11:33 AM	
		Ambulance call outs, information from casualty departments about where patients have been drinking, or buying alcohol, if alcohol is a factor in their visit. Longer term health stats are more of a problem as the causal link between long term health issues such as incidence of liver disease and the number of outlets must be difficult to establish.
17	Jan 24, 2013 11:11 AM	A&E admittances that are due to Alcohol consumption e.g. injuries sustained from fights falls etc.
18	Jan 24, 2013 11:00 AM	Police arrests relating to Alcohol induced violence/aggression.
		I can only see hospital A&E data as being provided, although figures and trends in access to treatment services would also give Licensing Committees some useful background information as to the impact of harmful alcohol consumption within areas under consideration.
20	Jan 24, 2013 10:28 AM	
		The amount and type of evidence that Health Authorities can obtain will be patchy to say the least. Having assisted our local PCT for some time I think the type and amount of evidence may not stand up if appealed. There needs to be major changes in the way evidence is gathered by PCT in line with the Cardiff model but in such a major organisation as the NHS this will be very difficult. To be able to gather evidence against premises in area will be as bad as evidence on individual premises and make not stand up to scrutiny.
22	Jan 24, 2013 9:20 AM	
24	Jan 24, 2013 8:20 AM	Police crime statistics; A&E data; PCT data;
		Drain on health care resources should be used as part of CIP. This would require Accident and Emergency Units to keep more detailed information on injury or attendance at A and E where alcohol is a causative factor. Licensed premises that allow abuse should provide financial support to Health Care Trusts and this should not be taken from tax payers.
26	Jan 24, 2013 1:43 AM	
28	Dec 10, 2012 8:44 AM	A&E admission figures

**22. Consultation Question 16: Should special provision to reduce the burdens on ancillary sellers be limited to specific types of business, and/or be available to all types of business**

AnswerOptions	Yes	No	Don't know	ResponseCount
A) The provision should be limited to a specific list of certain types of business and the	11	20	1	32
B) The provision should be available to all businesses providing they meet certain	7	23	1	31
C) The provision should be available to both a specific list of premises and more	9	22	2	33
<b>AnsweredQuestion</b>				<b>34</b>
<b>SkippedQuestion</b>				<b>46</b>

**23. Consultation Question 17: If special provision to reduce licensing burdens on ancillary sellers were to include a list of certain types of business, do you think it should apply to**

AnswerOptions	Yes	No	Don't know	ResponseCount
A) Accommodation providers, providing alcohol alongside accommodation as part of	15	19	0	34
B) Hair and beauty salons, providing alcohol alongside a hair or beauty treatment.	15	19	0	34
C) Florists, providing alcohol alongside the purchase of flowers.	15	19	0	34
D) Cultural organisations, such as theatres, cinemas and museums, providing alcohol	12	22	0	34
E) Regular charitable events, providing alcohol as part of the wider occasion	10	23	1	34
<b>AnsweredQuestion</b>				<b>34</b>
<b>SkippedQuestion</b>				<b>46</b>

**20. Consultation Question 14: Do you think any aspects of the current cumulative impact policy process would need to be amended to allow consideration of data on alcohol-related health**

AnswerOptions	ResponsePercent
YES	38.2%
NO	23.5%
Don't Know	38.2%

If yes, please specify which aspects in the box below, keeping your views to a maximum of 200 words.

<b>AnsweredQuestion</b>
<b>SkippedQuestion</b>

Number	Response Date	If yes, please specify which aspects in the box below, keeping your views to a maximum of 200 words.
1	Jan 30, 2013 12:30 PM	It needs to be contained in primary legislation, making clear the reversal of the burden of proof
2	Jan 30, 2013 10:25 AM	alcohol related health issues are generally long term and chronic, and therefore cannot be linked to an individual area such as a local authority. Destination towns and cities are related to the late night economy and will therefore have an increased short term health incidents such as visits to casualty, i dont beleive that health related cip would be of benefit to the community and introduce draconian measures that would interfrere with the local economy.
3	Jan 29, 2013 10:12 AM	You could consider the impact of the supermarkets in that area and require them to supply data on the amount of alcohol they sell and at what times. Reducing licensing hours for supermarkets would have a positive effect. A CIP could be considered when a prospective new supermarket wanted planning permission.
4	Jan 27, 2013 2:10 PM	Currently a CIP does require quite specific evidence. A Health CIP may well use more general, strategic level data. This would need to be recognised and caterd for to avoid legal challenge.
5	Jan 25, 2013 12:05 PM	Would need public health as a licensing objective.
6	Jan 24, 2013 5:06 PM	Put CIPs on a statutory footing, not just a few paragraphs in the guidance, which seems to acquire Judicial displeasure on a regular basis!
7	Jan 24, 2013 11:55 AM	Consideration needs to be given to A+E data sharing around assault and ambulance data. Information should also be shared from GPs. Relevant organisation need to be encouraged to share this on a regular basis. Supporting evidence could also be provided from A+ E workers and Alcohol Liaison Nurse Specialists.
8	Jan 24, 2013 11:33 AM	Considering each premises on its merits is dificult if persons are drinking in a variety of premises in the same area but the last premises that they visited is the most reported.
9	Jan 24, 2013 10:29 AM	Existing schemes too fragmented and not particularly well evidenced
10	Jan 24, 2013 9:29 AM	A&E stats, ambulance stats, alcohol related crime stats in the home that lead to assault and attendance at A&E. The local GP should also have a say, they will be aware of those with a problem, or deal with domestic violence associated with alcohol.
11	Jan 24, 2013 8:55 AM	The Health Authorities should have more input and there should be a licensing objective directly related to them.
12	Jan 24, 2013 8:01 AM	If a CIP were to be introduced it would be useful to have these statistics, but again I have reservations as to whether CIPs actually work.
13	Jan 24, 2013 1:43 AM	See above

h harms? (Please

Response	Count
13	
8	
13	
13	
	34
	46

Categories



**21. Consultation Question 15: What impact do you think allowing consideration of data on alcohol-related health harms when introducing a cumulative impact policy would have if it**

AnswerOptions	ResponseCount
	24
<b>AnsweredQuestion</b>	<b>24</b>
<b>SkippedQuestion</b>	<b>56</b>

Number	Response Date	Response Text
1	Jan 30, 2013 12:30 PM	Cannot comment
2	Jan 30, 2013 10:25 AM	interference on the growth of the local economy, and reducing the loacal areas public ammenities even further than the introduction of the smoking ban has harmed the licensing trade.
3	Jan 30, 2013 9:33 AM	None that would be effective
4	Jan 30, 2013 9:23 AM	None whatsoever- this is a very silly idea
5	Jan 30, 2013 8:26 AM	ALL HOSPITALS SHOULD KEEP DATA ON ALCOHOL RELATED INCIDENTS There would have to be very consistent figures and evidence to warrant further action being taken as a result. Given the type of
6	Jan 29, 2013 2:55 PM	establishments in our area, this would be difficult.
7	Jan 29, 2013 10:12 AM	I would do a study on the impact of alcohol sales in my area since ADSA, TESCO and MORRISONS and BARGAIN BOOZE opened. It would be a study that looked at 10 years worth of data analyzing all alcohol sales, all crime figures (including location of crime and type of crime, time of crime and age of offender) with hospital data like admissions and causes of death. I think you'd see a huge increase in the consumption of alcohol and a huge increase in obesity related illnesses
8	Jan 28, 2013 11:41 AM	none
9	Jan 27, 2013 2:10 PM	There are a significant number of street drinkers and also harmful drinkers. There is also a large NTE which creates a large number of acute alcohol problemsand binge drinkers. The town is also copiusly supplied with off licence outlets both large and small. All these, besides the obvious crime/disorder/niusance issues have a health toll. I would anticipate a reduction in these problems if a CIP cap was in place.
10	Jan 25, 2013 12:05 PM	Difficult to tell as we do not have the the data , also served by 2 hospitals.
11	Jan 25, 2013 10:41 AM	It depends on how accurate the data is, can a link be proved between such data and an area wanting a CI policy.
12	Jan 24, 2013 5:12 PM	Don't know
13	Jan 24, 2013 5:06 PM	Little, given the generality and paucity of the evidence relating to individual premises.
14	Jan 24, 2013 11:55 AM	It is felt that CIPs are limited in their use; they take an enormous amount of work to function properly and to deliver outcomes locally. The use of health data would aid this process; however data from A+E and Ambulance data is not currently at a high enough quality to be used locally. Pressure is needed on those who are currently not collecting A+E data to do this and it may be that primary legislation is needed to encourage health to do this in a way that is robust enough to be used in a court of law.
15	Jan 24, 2013 11:33 AM	we do not currently have any CIP's so not sure.
16	Jan 24, 2013 11:11 AM	It may give strength to the arguments for introducing a CIP, or it may not. I have not had an opportunity to look at health stats so would not be in a position to comment more authoritatively.

- |           |                              |  |
|-----------|------------------------------|--|
| <b>17</b> | <b>Jan 24, 2013 11:00 AM</b> | It may help to reduce the "binge drinking" mentality and the related consequences of this. It may also have a long term effect of the general health of the population in regards to long term alcohol use.  |
| <b>18</b> | <b>Jan 24, 2013 10:29 AM</b> | If, as I suspect, the policy is about controlling the number of licensed premises then I oppose it. There needs to be more enforcement on premises in high concentration areas - particularly over serving people who are drunk.   |
| <b>19</b> | <b>Jan 24, 2013 10:28 AM</b> | It would re-introduce albeit under a slightly different guise a 'needs test'. It may also be sucesful in arresting the proliferation of small retail units who add alcohol sales to their offer, many of which are poorly run, with very little understanding of the social impact of the product. |
| <b>20</b> | <b>Jan 24, 2013 9:20 AM</b>  | None as I think the current data available in the majority of areas in the Country will not be sufficient to add any evidence.   |
| <b>21</b> | <b>Jan 24, 2013 8:55 AM</b>  | It would enable licensing authorities to target limited resources more effectivley.<br>I think it would be useful as generic information to introduce a CIP policy. However, it would be difficult to pinpoint individual premises with  |
| <b>22</b> | <b>Jan 24, 2013 8:01 AM</b>  | this information.  |
| <b>23</b> | <b>Jan 24, 2013 1:43 AM</b>  | I think that it would have a drastic effect on consideration for reviewing or granting licenses.   |
| <b>24</b> | <b>Dec 10, 2012 2:13 PM</b>  | Unlikely to apply  |

**24. Consultation Question 18: Do you have any suggestions for other types of businesses to which such special provision could apply without impacting adversely on one or more of the**

AnswerOptions	ResponseCount
	19
<b>AnsweredQuestion</b>	<b>19</b>
<b>SkippedQuestion</b>	<b>61</b>

Number	Response Date	Response Text
1	Jan 30, 2013 8:48 PM	NO. ISSUES ALREADY EXIST WITH TOO MUCH ALCOHOL BEING AVAILABLE TOO READILY IN OFF SALES. CONSULTATION IS ABOUT REDUCING ACCESS TO ALCOHOL NOT MAKING EASIER TO OBTAIN. It could apply anywhere where alcohol (possibly in limited quantities) is provided as other than the
2	Jan 30, 2013 12:42 PM	main business
3	Jan 30, 2013 10:29 AM	market stalls and outdoor events
4	Jan 30, 2013 9:35 AM	None
5	Jan 30, 2013 9:27 AM	No I don't. The Licensing Act is actually quite a good Act and has benn tinkered with and tinkered with over the last 7 years for no benefit to anyone. Just leave it alone.
6	Jan 30, 2013 9:16 AM	There is already a facility for Temporary Events Notices to cover this area, it would create further loopholes.
7	Jan 30, 2013 8:31 AM	NO
8	Jan 29, 2013 3:12 PM	Businesses that sell hampers mostly comprised of food - similar to florists
9	Jan 29, 2013 10:20 AM	It seems strange for the Government on one side to say that too much alcohol is being consumed and this needs to be discouraged and then on the other side to say it is going to encourage certain types of businesses to promote themselves using alcohol! This is a terrible idea! We already have petrol stations and garages pretending that their shop makes more sales than their petrol/garage sales and solicitors making huge sums in keeping them their licences. This would result in widespread abuse and all sorts of knock on problems. As an example, hotels are one of our top sources for ASB complaints. But they are suggested as one class of premise to be included in this. Don't do it!
10	Jan 27, 2013 2:16 PM	No
11	Jan 24, 2013 5:15 PM	No
12	Jan 24, 2013 12:29 PM	all events hould remain under the Act
13	Jan 24, 2013 12:16 PM	River cruise boats This is about deregulation for local business and treating alcohol like any other consumer product, which is not a good thing. The definition of ancillary sales is not fully defined. This will complicate the licensing process, for example a hairdresser will be able to sell a glass of wine and then maybe change into a seller, it would be hard to define which premises is able to sell alcohol. The enforcement aspect of doing this would be difficult to do. Safeguarding would also become an issue in terms of preventing young people having access to alcohol and being around alcohol.
14	Jan 24, 2013 12:00 PM	It is felt that the Act should remain as it is. We recently had a couple of situations where a butcher was offering a glass of wine when you bought a certain brand of sausages. We also had a warehouse that offered a bottle of wine when you bought certain tools over a specific price, but we had to inform them that this was "illegal". These types of situation should be exempt from the need to have a premise licence.
15	Jan 24, 2013 11:26 AM	

16

Jan 24, 2013 9:44 AM

A two tier system of licensing the sale of alcohol is frankly stupid. If you sell alcohol no matter how much you sell you should still require a full premies licence together with the appropriate safeguards, otherwise the whole system is open to abuse. If the Government what to cut down on red tape they should lfrankly stop tinkering with something that works. If they wish to reduce burdens then give Licensing Authorities the power to levy a lesser premises licence fee (application and annual fee) fro such premises provided certain locally met criteria are met.  
The sale of alcohol is a sale of alcohol!! The supply of alcohol should be a licensable activity! Why introduce any exemption if you are serious about reducing harm, why make it more socially acceptable, widely available in what are uncontrolled environments, with little or no enforcment due to the lack of

17

Jan 24, 2013 9:37 AM

resources?

18

Jan 24, 2013 8:09 AM

No suggestions.

19

Dec 10, 2012 11:15 AM

No

**25. Consultation Question 19: The aim of a new 'ancillary seller' status is to reduce burdens on businesses where the sale of alcohol is only a small part of their business and occurs**

AnswerOptions	ResponsePercent	ResponseCount
YES	39.4%	13
NO	48.5%	16
Don't Know	12.1%	4
If no, please describe the changes you would make in the box below (keeping your views to a maximum of 200 words).		11
<b>AnsweredQuestion</b>		<b>33</b>
<b>SkippedQuestion</b>		<b>47</b>

Number	Response Date	If no, please describe the changes you would make in the box below (keeping your views to a maximum of 200 words).	Categories
1	Jan 30, 2013 8:48 PM	NO. ISSUES ALREADY EXIST WITH TOO MUCH ALCOHOL BEING AVAILABLE TOO READILY IN OFF SALES. PREMISES WILL BE OPEN TO ABUSE.	
2	Jan 29, 2013 3:12 PM	Possibly - concerned about the enforcement of this and believe it would be difficult in order to obtain appropriate evidence to deal with this.	
3	Jan 29, 2013 10:20 AM	I think the government (as usual) is over regulating which will lead to definition issues and loopholes.	
4	Jan 27, 2013 2:16 PM	I would not have such a scheme at all.	
5	Jan 25, 2013 3:26 PM	It would be difficult to produce a list of ancillary sales which was inclusive enough and would allow people to abuse the system.	
6	Jan 24, 2013 5:10 PM	It will become effectively impossible to enforce the restrictions on the sale of alcohol, given that the proposed loopholes in the legislation will destroy what little clarity is left.	
7	Jan 24, 2013 12:29 PM	there will always be a loophole! Keep it as it is and everyone knows where they are. Every time the law is "relaxed" it makes it more confusing for the public & the authority!	
8	Jan 24, 2013 12:00 PM	See reply to question 18	
9	Jan 24, 2013 9:44 AM	No. Please see comments above. Retain the current system of licensing but allow Local Authorities the power to levy lesser fees for such premises that meet certain criteria.	
10	Jan 24, 2013 9:37 AM	What about the burden on the Licensing Authority, the Police and Environmental Health not to forget the Health Authority?	
11	Dec 10, 2012 2:16 PM	The current system is adequate and does not need tinkering with by inexperienced politicians - yet again.	

<b>26. Consultation Question 20: Do you think that these proposals would significantly reduce the burdens on ancillary sellers? (Please select one option in each row):</b>				
<b>AnswerOptions</b>	<b>Yes</b>	<b>No</b>	<b>Don't know</b>	<b>ResponseCount</b>
A) Allow premises making ancillary sales to request in	8	23	2	33
B) Introduce a new, light-touch form of authorisation	12	18	3	33
C) Introduce a new, light touch form of authorisation	12	20	1	33
<b>AnsweredQuestion</b>				<b>33</b>
<b>SkippedQuestion</b>				<b>47</b>

<b>27. Consultation Question 21: Do you think that the following proposals would impact adversely on one or more of the licensing objectives (see glossary)? (Please</b>				
<b>AnswerOptions</b>	<b>Yes</b>	<b>No</b>	<b>Don't know</b>	<b>ResponseCount</b>
A) Allow premises making ancillary sales to request in	19	13	1	33
B) Introduce a new, light-touch form of authorisation	16	14	2	32
C) Introduce a new, light touch form of authorisation	16	14	2	32
<b>AnsweredQuestion</b>				<b>33</b>
<b>SkippedQuestion</b>				<b>47</b>

28. Consultation Question 22: What other issues or options do you think should be considered when taking forward proposals for a lighter touch authorisation? (Please specify in the box)		
AnswerOptions	ResponseCount	
	18	
<i>AnsweredQuestion</i>		18
<i>SkippedQuestion</i>		62

Number	Response Date	Response Text
1	Jan 30, 2013 8:48 PM	HEALTH IMPLICATIONS ON OFFERING CONSUMPTION OF ALCOHOL FROM EVEN MORE OUTLETS WHATEVER THEY ARE CALLED / LABELLED.  There needs to be a mechanism to limit or remove the ability to sell alcohol if it is shown to breach one or more of the licensing objectives. Similar to review. This could then reduce the freedoms, require a premises licence and personal licensee, or prohibit alcohol sales completely. Obviously rights of appeal need to apply.
2	Jan 30, 2013 12:42 PM	None
3	Jan 30, 2013 9:35 AM	The Licensing Act is actually quite a good Act and has benn tinkered with and tinkered with over the last 7 years for no benefit to anyone. Just leave it alone. This lighter touch red tape challenge nonsense is not helping anyone and is crippling Local Authorities trying to keep up with the pointless changes
4	Jan 30, 2013 9:27 AM	The mandatory condition requiring an age verification policy should apply.
5	Jan 30, 2013 9:16 AM	The need for a personal licence holder should be negated by the fact that little alcohol is being sold or alcohol is being sold where no crime/disorder or nuisance could arise, therefore this shouldn't be necessary.  We believe a fee should be imposed on submitting an ASN to cover authorities' time in dealing with these.  If the person who submitted the ASN leaves the premises/is no longer involved with the business, someone else should submit an ASN much the same as a notification under the Gambling Act 2005 if licensed premises wish to provide 2 or less gaming machines.
6	Jan 29, 2013 3:12 PM	That it encourages people to consume alcohol. I thought the government was against drink driving and excess alcohol consumption. These proposals contradict this. Also if a customer consents to a beauty treatment they then regret, is there an issue if they wouldn't have agreed if they hadn't consumed alcohol provided by the salon? I was uncomfortable with DFS giving out glasses of wine and then trying to get you to buy a sofa!
7	Jan 29, 2013 10:20 AM	I repeat....don't do it!
8	Jan 27, 2013 2:16 PM	This ASN would not allow residents the opportunity to object to licences.
9	Jan 25, 2013 3:26 PM	Don't know
10	Jan 24, 2013 5:15 PM	None. Please leave the legislation in a stable state for several years before adding even more confusion to an already complex statutory code. simpler form. Requirement to send to Licensing authority only (with LA having discretion to consult relevant responsible authorities as exists in Minor variation provisions)
11	Jan 24, 2013 12:16 PM	A lighter touch authorisation should not be considered for issues relating to safeguarding and excessive alcohol consumption. Alcohol should not be treated like any other product.
12	Jan 24, 2013 12:00 PM	
13		

- 14 Jan 24, 2013 11:26 AM** As long as any supply of alcohol is minimal and only incidental to their normal sales e.g. Promotions etc. it would help these sort of sellers without adversely affecting their business.
- 15 Jan 24, 2013 10:42 AM** Surely introducing another form of authorisation for ancillary sales will create more confusion and burden on not just the trade but on licensing authorities and responsible authorities alike. An application for a premises licence is not a difficult process and removing the need for a DPS would then only leave a requirement on the business to pay an annual fee and not worry further about the authorisation.
- 16 Jan 24, 2013 9:44 AM** As stated reduce the fees for such premises rather than the regulations as they are at present. If the proposals were brought in whom is going to enforce on premises who breach such ancillary sales levels, the answer is very simple - no one. Far better to reduce the costs and leave the licensing regime the same.
- 17 Jan 24, 2013 9:37 AM** A sale is a sale a supply of alcohol is a supply, why exempt anyone who wishes to make a profit from either. Why is the free offer/inducement of alcohol acceptable?
- 18 Jan 24, 2013 8:09 AM** A very radical approach would be to repeal the Licensing Act in its entirety. It has become a mishmash of amended, removed, and additional Sections, Regulations & Guidance and is virtually impossible to enforce. Clever legal advisors can drive a wagon and horses through the legislation and it has become a joke. I would suggest repeal the Act and allow unlimited activity. Then if premises have problems they should be reviewed and limited hours and appropriate conditions should be applied to add control.



29. Consultation Question 23: Do you agree that licensing authorities should have the power to allow organisers of community events involving			
AnswerOptions	ResponsePercent	ResponseCount	
YES	35.5%	11	
NO	64.5%	20	
Don't Know	0.0%	0	
<i>AnsweredQuestion</i>			<b>31</b>
<i>SkippedQuestion</i>			<b>49</b>

30. Consultation Question 24: What impact do you think a locally determined notification would have on organisers of community events? (Please select one option in each row):				
AnswerOptions	Yes	No	Don't know	ResponseCount
A) Reduce the burden	15	12	2	29
B) Increase the burden	13	8	4	25
<i>AnsweredQuestion</i>				<b>32</b>
<i>SkippedQuestion</i>				<b>48</b>

31. Consultation Question 25: Should the number of TENs which can be given in respect of individual premises be increased? (Please select one)			
AnswerOptions	ResponsePercent	ResponseCount	
YES	28.1%	9	
NO	71.9%	23	
Don't Know	0.0%	0	
<i>AnsweredQuestion</i>			<b>32</b>
<i>SkippedQuestion</i>			<b>48</b>

32. Consultation Question 26: If yes, please select one option to indicate which you would prefer:			
AnswerOptions	ResponsePercent	ResponseCount	
15	11.1%	1	
18	88.9%	8	
Don't know	0.0%	0	
<i>AnsweredQuestion</i>			<b>9</b>
<i>SkippedQuestion</i>			<b>71</b>

**35. Consultation Question 29: Please describe in the box below any other types of premises to which you think a nationally prescribed**

AnswerOptions	ResponseCount
	11
<b>AnsweredQuestion</b>	<b>11</b>
<b>SkippedQuestion</b>	<b>69</b>

Number	Response Date	Response Text
1	Jan 30, 2013 9:36 AM	None
2	Jan 30, 2013 9:28 AM	Late Night refreshment houses cause more problems than a lot of other premises so to de regularise would be bonkers.
3	Jan 30, 2013 9:18 AM	Hot drink vending machines This is another silly idea. The Police are keen to control late night takeaways like kebab shops as they can be trouble hot spots when people gather there after the pubs and clubs close. The Police will not be keen on an exemption which means they could open until 5am. Also the licensing act deals primarily with sales rather than consumption which could lead to loopholes that people bring a drink in to consume while they're waiting for their burger!
4	Jan 29, 2013 10:26 AM	I advise real caution here. I see the potential for lots of loopholes. Certainly this should not apply to any takeaway premise. Only seated restaurant premises which do not sell alcohol. This will be such a small number of places that I cannot see its worth in being introduced.
5	Jan 27, 2013 2:20 PM	None.
6	Jan 24, 2013 5:12 PM	None.
7	Jan 24, 2013 12:03 PM	We should not have a nationally prescribed exemption.
8	Jan 24, 2013 11:33 AM	Hotels/Guest Houses. LNR should be excluded from premises licences where other licensable activities are taking place. i.e. LNR only required when it is the sold licensable activity
9	Jan 24, 2013 10:36 AM	only required when it is the sold licensable activity
10	Jan 24, 2013 9:46 AM	None
11	Jan 24, 2013 8:12 AM	Don't know.

**33. Consultation Question 27: Do you think that licensing authorities should have local discretion around late night refreshment in each of the following ways?**

AnswerOptions	Yes	No	Don't know	ResponseCount
A) Determining that premises in	7	25	0	32
B) Determining that certain	10	22	0	32
<b>AnsweredQuestion</b>				<b>32</b>
<b>SkippedQuestion</b>				<b>48</b>

**34. Consultation Question 28: Do you agree that motorway service areas should receive a nationally prescribed exemption from regulations for the provision of**

AnswerOptions	Yes	No	Don't know	ResponseCount
A) Motorway service areas should	21	7	4	32
<b>AnsweredQuestion</b>				<b>32</b>
<b>SkippedQuestion</b>				<b>48</b>

**36. Consultation Question 30: Do you agree with each of the following proposals? (Please select one option in each row):**

AnswerOptions	Yes	No	Don't know
A) Remove requirements to advertise licensing applications in local newspapers.	21	11	0
B) Remove the centrally imposed prohibition on the sale of alcohol at MSAs for the on and off-trade.	11	17	4
C) Remove the centrally imposed prohibition on the sale of alcohol at MSAs but only in respect of overnight accommodation – “lodges”.	13	15	4
D) Remove or simplify requirements to renew personal licences under the 2003 Act.	12	19	1
			<b>AnsweredQuestion</b>
			<b>SkippedQuestion</b>

**37. Consultation Question 31: Do you think that each of the following would reduce the overall burdens on business? (Please select one option in each row):**

AnswerOptions	Yes	No	Don't know
A) Remove requirements to advertise licensing applications in local newspapers.	25	7	0
B) Remove the centrally imposed prohibition on the sale of alcohol at MSAs for the on and off-trade.	16	12	4
C) Remove the centrally imposed prohibition on the sale of alcohol at MSAs but only in respect of overnight accommodation – “lodges”.	14	14	4
D) Remove or simplify requirements to renew personal licences under the 2003 Act.	18	13	1
			<b>AnsweredQuestion</b>
			<b>SkippedQuestion</b>

**38. Consultation Question 32: Do you think that the following measures would impact adversely on one or more of the licensing objectives (see glossary)? (Please select one option in each row):**

AnswerOptions	Yes	No	Don't know
A) Remove requirements to advertise licensing applications in local newspapers.	12	20	0
B) Remove the centrally imposed prohibition on the sale of alcohol at MSAs for the on and off-trade.	15	12	5
C) Remove the centrally imposed prohibition on the sale of alcohol at MSAs but only in respect of overnight accommodation – “lodges”.	9	19	4
D) Remove or simplify requirements to renew personal licences under the 2003 Act.	17	12	3
			<b>AnsweredQuestion</b>
			<b>SkippedQuestion</b>

ResponseCount
32
32
32
32
32
48

ResponseCount
32
32
32
32
32
48

each row):
ResponseCount
32
32
32
32
32
48

39. Consultation Question 33: In addition to the suggestions outlined above, what other sections of or processes under the 2003 Act could in your view be removed or simplified in order	
AnswerOptions	ResponseCount
	9
<b>AnsweredQuestion</b>	<b>9</b>
<b>SkippedQuestion</b>	<b>71</b>

Number	Response Date	Response Text
1	Jan 30, 2013 9:37 AM	None
		Proper provision for responsible authorities to attach conditions to licences with the agreement of the applicant without the need for a hearing. This is technically permitted, but it would be better if this was explicit in the Act.
		Power to revoke licences (as well as suspension) where fees have not been paid to avoid the burden of authorities having to chase people because a licence is still technically in place.
2	Jan 29, 2013 3:27 PM	Provision to enforce conditions attached to licences even when activities are not taking place.
3	Jan 27, 2013 2:26 PM	I cannot think of any.
4	Jan 25, 2013 3:51 PM	We have no service stations Please sort out the issues in respect of garages - either allow them to sell alcohol or prevent it completely. The current legislation is unworkable and unenforceable.
5	Jan 24, 2013 5:15 PM	Application forms tailored to the business. Waive requirement to copy to all responsible authorities. In most cases a notification that an application has been made should suffice. Alternatively the Licensing Authority could take on the responsibility to forward the applications (or links to their website where the details are held) to the RAs
6	Jan 24, 2013 12:46 PM	Concerns about mixed messages around drink driving.
7	Jan 24, 2013 12:05 PM	Personal licence questions seem to not take the sale of alcohol seriously enough.
		It is madness to remove the need to renew Personal licences. the current legislation fails when personal licence holders commit relevant offences. Often the licence holders tells the courts but the courts fail to inform licensing authorities. Also Courts do not ask the question if offenders are personal licence holders and in general the Courts do not understand the licensing legislation. I have numerous examples of offences coming to light where neither the police or licensing authorities have been made aware of relevant convictions. It is vital that the renewal process is maintained including a DBS (CRB) checks.
8	Jan 24, 2013 9:53 AM	Otherwise offences will go undetected for personal licence holders which will undermine the licensing objectives.
9	Jan 24, 2013 8:14 AM	Simplify all the application forms. They are absolute nightmare; always were and continue to be especially with all the continual changes that are introduced.

<b>40. Consultation Question 34: Do you think that the Impact Assessments related to the consultation provide an accurate</b>				
<b>AnswerOptions</b>	<b>Yes</b>	<b>No</b>	<b>Don't know</b>	<b>ResponseCount</b>
A) Minimum unit pricing.	6	16	10	32
B) Multi-buy promotions.	7	15	10	32
C) Health as a licensing objective for	6	17	9	32
D) Ancillary sales of alcohol.	5	17	10	32
E) Temporary Event Notices.	7	17	8	32
F) Late night refreshment.	7	17	8	32
G) Removing the duty to advertise	14	10	8	32
H) Sales of alcohol at motorway service	11	10	10	31
I) Personal licences.	8	15	9	32
<b>AnsweredQuestion</b>				<b>32</b>
<b>SkippedQuestion</b>				<b>48</b>



**41. Consultation Question 35: Do you have any comments on the methodologies or assumptions used in the impact assessments? If so, please detail them, referencing**

AnswerOptions	ResponsePercent	ResponseCount
YES	3.7%	1
NO	70.4%	19
Don't Know	25.9%	7
If yes, please specify in the box below, referencing clearly the impact assessment and page to which you refer (keeping your views to a maximum of 400		4
<b>AnsweredQuestion</b>		<b>27</b>
<b>SkippedQuestion</b>		<b>53</b>

Number	Response Date	If yes, please specify in the box below, referencing clearly the impact assessment and page to which you refer (keeping your views to a maximum of 400 words).	Categories
1	Jan 29, 2013 10:29 AM	I think there are far too many assumptions. I appreciate predictions are difficult but I don't think there figures are at all accurate  Ancillary sales- this fails to take account of the issues around garages which is a very similar issue. This needs further detail to advise properly. Late night refreshment- This does not take proper account that certain LNRs are a hotspot of trouble. Nor does it seem that the survey accepts that the proposals will only apply to a very small number of premises. Alcohol Sales at MSA s- This takes to account of the drink drive issues. The ONLY way to get toan MSA is in a vehicle. Alcohol should not be sold here at all. As for hotels, this might well lead to a drinking session overnight and the person driving over the limit the next day. Personal licences- There are already enough NCPLHs who really shouldn't have one. This will still further weaken the process.	
2	Jan 27, 2013 2:31 PM		
3	Jan 25, 2013 10:57 AM	I cannot possibly see how 714 lives a year can be saved, where has this figure been plucked from? Likewise a harmful drinker would only have to find another two pounds per week to maintain their drinking habit.	
4	Jan 24, 2013 12:47 PM	have not had an opportunity to read them	