



Date 6 February 2013

Dear Sir/Madam

### Home Office Alcohol Strategy Consultation

Please find below our comments on the Alcohol Strategy consultation.

#### Minimum Unit price for alcohol

Our view is that unit pricing of alcohol at 45p per unit will not make any significant difference to consumption of alcohol, or the other indicators mentioned, as it will not significantly affect consumption nationally. We suspect that only a draconian increase in unit pricing of alcohol will provide for a significant reduction in drinking.

If introduced we would suggest that the minimum price is reviewed after a set period to consider its efficacy rather than simply updating in line with inflation.

In addition, it is anticipated that the unit pricing itself will be very difficult to enforce especially if it is linked to the ABV of each drink.

#### Ban on multi-buy promotions in the off trade

From the City perspective this measure has little impact. It is quite possible that other alternative routes to achieve the same promotional effect will be sought by licensing businesses if this is too narrowly defined.

#### Review of the mandatory licensing provisions

The City considers that the mandatory conditions are both necessary and working well. The conditions should be left in place as they have no impact on a well-run business.

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

The City has no areas covered by such policies and is not currently considering any. We agree that a Health objective could have an impact in the future in considering such policies although

currently the flow of information is low level and considerable effort would need to be made in order to improve the consistency and validity of the evidence gathered. This may be a subject that is taken up by the Health and Wellbeing Board being set up from April 2013.

#### Ancillary sale of alcohol

We understand and agree with the wish to remove perceived unnecessary burdens from business. The main difficulty we foresee is being able to define 'small part' or 'incidental' to wider activities of a business. Volume of sales, turnover and other measures all have their flaws. We suggest that it would be easier for all parties if exemption categories were provided, either mandatory or from a list which may be locally adopted in the same way exemption categories have been provided in the legislation for the late night levy. It is not recognised however that the imposition of requirements to sell alcohol is of great significance or difficulty for a business to comply with, although the removal of the need for there to be a personal licence holder for 'ancillary' sales is sensible. It would be better in our view to make the application form readily understandable and easier to complete to decrease the burden on business.

#### Occasional provision of licensing activities at community events

The City opposes the suggestion of a local mechanism for dealing with local events. The system of TENS is clear and reasonably efficient and a local mechanism would create significant inconsistencies and greater burden for applicants and regulators alike across the country. As for ancillary sales we suggest the best way of helping community events, as with business, is to revise and make clearer the application form/process.

#### An extension of the TEN limit for individual premises

The number of TENS should not be increased. The amount of TENS available to a business is sufficient and rarely is the full limit utilised. We consider that the use of TENS is resource intensive for the responsible authorities, whilst being relatively straight forward for the applicant, and if the limit is being reached the business ought to be considering application for a variation of the licence to reflect the change of their core business.

#### Late night refreshment

Late night refreshment can be linked to patrons of licensed premises even where they do not sell alcohol themselves. We see no benefit determining locally the need for a licence in areas or for certain premises and consider it clearer and easier for all parties to keep the legislation imposed on this area national and therefore consistent.

#### Further proposals to reduce burdens on businesses

We completely agree with the suggestion to remove the requirement to advertise locally in newspapers as this is an unnecessary cost to business when the internet can be used to publish the same information.

We do not know whether the change at motor way service stations to allow the sale of alcohol would impact the licensing objectives but it would certainly remove an obvious barrier to trade in that niche market. Sale of alcohol in respect of lodges at motor way service stations seems a reasonable change to us.

The removal or simplification of the requirements to renew a personal licence would be welcome to all responsible authorities and the holders, and potential holders, of such licences.

