



Alcohol Concern
Making Sense of Alcohol

Alcohol Concern's response to the consultation on delivering the Government's policies to cut alcohol fuelled crime and anti-social behaviour

January 2013

About Alcohol Concern

Alcohol Concern is the national charity on alcohol misuse for England and Wales, campaigning for effective alcohol policy and improved services for people whose lives are affected by alcohol-related problems.

Alcohol Concern is a voluntary organisation with offices in London and Cardiff.

Response to consultation

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

Consultation Question 1:

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

Yes **X**

No

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)

Alcohol Concern supports the proposal to introduce a minimum unit price for alcohol. This is a targeted measure that will raise the price of the cheapest alcohol reducing consumption amongst younger and heavier drinkers, whilst having little financial impact on those who drink alcohol moderately.

Whilst Alcohol Concern welcomes the Government's commitment to introduce a minimum unit price (MUP) for alcohol, it is imperative that the MUP is set at a level that will significantly reduce harm. Based on the best available evidence, Alcohol Concern believes that this should be at least 50p per unit. Modelling done by University of Sheffield shows that a MUP of 50p would prevent a further 1000 deaths, 31,000 alcohol-related hospital admissions, and 18,000 crimes per year than 45p.ⁱ

Minimum pricing legislation has been passed in Scotland with the Scottish Government intending to introduce a MUP of 50p. In order to avoid cross-border trading it would be prudent to introduce the same MUP in England and Wales.

The Chief Medical Officer's report of 2008 called for a MUP of 50pⁱⁱ.

A MUP of 50p would be easier for enforcement calculations than alternative levels.

Consultation Question 2: Should other factors or evidence be considered when setting a minimum unit price for alcohol? (Please select one option)		
Yes X	No	Don't know
<i>If yes please specify in the box below (keeping your views to a maximum of 200 words)</i>		
<p>Alcohol-related harm is estimated to cost around £21billion per year in Englandⁱⁱⁱ. This figure comprises NHS costs, alcohol-related crime and lost productivity due to alcohol. If the costs of wider social harm, such as the effect on children, were included the cost would be considerably higher. Alcohol is associated with more than 60 medical conditions^{iv} and deaths directly related to alcohol rose by 22% between 2001 and 2010^v. Urgent action is needed to combat these harms.</p> <p>There is now considerable evidence to show that increasing the price of alcohol significantly reduces alcohol-related harms^{vi}. Setting a minimum unit price for alcohol of at least 50p is a fundamental step forward in attempting to tackle the substantial cost of alcohol-related harm.</p> <p>It is important to note that due to inflation since the Sheffield model was published in 2009 a MUP of 50p is now valued at 54p.</p> <p>MUP should be subject to regular and vigorous review to ensure alcohol does not become more affordable over time.</p> <p>We would ask the Government to explore a mechanism for channelling extra money received from MUP to retailers into reducing harms of alcohol at local level.</p>		

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)		
Do nothing – the minimum unit price should not be adjusted		<input type="checkbox"/>
The minimum unit price should be automatically be updated in line with inflation each year		<input checked="" type="checkbox"/>
The minimum unit price should be reviewed after a set period		<input type="checkbox"/>
Don't know		<input type="checkbox"/>

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 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)		
Yes X	No	Don't know
<i>If Yes please specify in the box below (keeping your views to a maximum of 100 words)</i>		
<p>Alcohol-related harm impacts many in society. The following groups will benefit from MUP:</p> <ul style="list-style-type: none">• Children. MUP will mean fewer children exposed to parental alcohol misuse, in addition to reduced consumption amongst children.• Victims of crime. A MUP of 50p will result in 42,500 fewer crimes per year^{vii}.• Police forces. See above Victims of crime.• Hospitals. A MUP of 50p will result in 97,700 fewer hospital admissions per year^{viii}.• Employers. A MUP of 50p will result in a reduction of over 440,000 days lost to alcohol-		

related absenteeism per year^{ix}

- Local community pubs. Cheap alcohol in the off-trade has contributed to the decline of the local British pub. Recent surveys have highlighted that the majority of pub landlords support MUP^x

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)

Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Don't know	<input type="checkbox"/>
-----	-------------------------------------	----	--------------------------	------------	--------------------------

Consultation Question 6:

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

Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Don't know	<input type="checkbox"/>
-----	-------------------------------------	----	--------------------------	------------	--------------------------

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

Alcohol is not an ordinary product - it causes significant health and social harms and therefore should be treated differently to other products. Any promotion that offers an incentive to buying more alcohol than intended should not be permitted including:

- promotions offering money off individual items,
- multi-buy promotions in the on-trade,
- loyalty point schemes such as those offering points for alcohol purchases.

Consultation Question 7:

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

Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Don't know	<input type="checkbox"/>
-----	-------------------------------------	----	--------------------------	------------	--------------------------

If Yes please specify in the box below (keeping your views to a maximum of 200 words)

Alcohol is a substance that can cause considerable harm to individuals, families, and wider society. The dominant view that alcohol is a product that can be treated like any other needs to be challenged. A ban on multi-buy promotions combined with a MUP of 50p would have a significant impact on reducing the harm and associated costs of alcohol misuse. As a society, we are currently paying a huge price attempting to deal with the harms of alcohol misuse retrospectively. It would instead be prudent to lessen the incidence of these harms by reducing alcohol-related deaths, hospital admissions, absenteeism and crimes. A ban on multi-buy promotions, together with a MUP of 50p will do this, as the research below indicates.

- An Alcohol Concern and Balance survey of 16-24 year olds found that promotions on alcohol encouraged them to drink more than they would otherwise^{xi},
- University of Sheffield modelling for the Scottish Government indicates that a ban on price discounts alongside a MUP of 50p (at 2009 prices) would have a far greater impact than MUP alone^{xii}.

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)

Yes X	No	Don't know
--------------	----	------------

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

Groups that will benefit from a ban on multi-buy promotions include:

- Young people would benefit as they would be less incentivised to drink more than they otherwise would choose to, as discussed above,
- Frontline services such as police, ambulance services and hospitals would be dealing with fewer cases of alcohol-related harm freeing up their time and resources,
- People on low incomes would benefit as they are disproportionately affected by alcohol-related harm. Alcohol-related death rates are 45% higher in areas of high deprivation^{xiii}. This is despite people in lower socio-economic groups consuming less than those in higher ones.

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)?
Please state Yes/No/Don't know in each box

		Prevention of crime and disorder	Public Safety	Prevention of public nuisance	Protection of harm to children
A	Irresponsible promotions	Yes	Yes	Yes	Yes
B	Dispensing alcohol directly into the mouth	Yes	Yes	Yes	Yes
C	Mandatory provision of free tap water	Yes	Yes	Yes	Yes
D	Age verification policy	Yes	Yes	Yes	Yes
E	Mandatory provision of small measures	Yes	Yes	Yes	Yes

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)

Yes	No X	Don't know
-----	-------------	------------

If no please state what more could be done in the box below (keeping your views to a maximum of 100 words)

The Code should be extended to restrict promotions of all types that encourage excessive consumption such as irresponsible promotions including 'Buy 2 large glasses and get the rest of the bottle free',^{xiv} and '2-4-1 on cocktails'.^{xv} Volume discounting or incentives to buy more alcohol than might otherwise be purchased should be prohibited, including voucher/reward card deals which are becoming increasingly common, as should promotions that cut prices for a specified time e.g. happy hours. Also promotions that encourage excessive drinking in pubs and clubs where organised by a third party such as Carnage student bar crawls.

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) which could be tackled through a mandatory licensing condition?

(Please select one option)

Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	Don't know <input type="checkbox"/>
---	-----------------------------	-------------------------------------

If Yes please specify in the box below (keeping your views to a maximum of 200 words)

To enable customers to better manage their alcohol consumption, we recommend an additional mandatory condition that would ensure that soft/non-alcoholic drinks be made available at reasonable prices e.g at least one soft drink (not free water) to be cheaper than the cheapest alcoholic drink. Alcohol Concern's survey of on-trade promotions in 2009 found that individual alcoholic drinks were sometimes cheaper than the cheapest available soft drink.^{xvi} Providing and promoting soft/non-alcoholic drinks at a lower cost than alcoholic drinks will incentivise customers to alternate between alcoholic and non-alcoholic drinks and not penalise those who prefer not to drink alcohol, for example for religious or cultural reasons, or if they intend to drive. Also, free water should be visible and customers able to help themselves.

With reference to the existing requirement to make available smaller measures, in the case of wine we recommend that alcohol should not be sold by the 250ml measure, as this size is likely to contain between 2.5 and 3.5 units and, in many cases, may exceed a woman's recommended daily intake. Given that the public's knowledge of the number of units within individual drinks remains poor, it is likely that many adults will be unaware that three large glasses equates to one bottle. The 35ml spirit measure should also be withdrawn, leaving the 25ml which equates to one unit.

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)

Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	Don't know <input type="checkbox"/>
------------------------------	--	-------------------------------------

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)

The condition relating to irresponsible promotions should be applicable to both the on- and off-trade. The number of off-licence premises has nearly doubled since the 1950s to 45,000,^{xvii} with many of these located in town/city centres, often with licenses to sell alcohol late into the evening. Ensuring that alcohol at such premises is sold and promoted responsibly is relevant to the effective management of a safe night-time economy. In addition, people who have purchased alcohol from the off-trade, prior to entering the night-time economy (called pre-loading), are more likely to be a victim or perpetrator of crime.^{xviii}

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 in the box below (keeping your views to a maximum of 200 words)

Current guidance accompanying the Licensing Act 2003 asserts that licensing authorities, when establishing the evidence base for a CIP, can draw upon health-related statistics, such as alcohol-related emergency attendances and hospital admissions. Such statistics will be relevant when considering alcohol-related health harms, but will be dependent on their quality and availability. Alcohol Concern recommends the Government develops and introduces standard systems to more effectively measure and record the levels of alcohol-related harm for all patients in both accident and emergency departments, and via hospital admissions.

National level data, such as alcohol consumption recorded in England and Wales annual health surveys, will be useful where inference can be drawn at a local level. Licensing authorities should also take note of academic research that may be relevant to their area. For example, Cardiff University, led by Professor David Fone, is currently undertaking a piece of research (Change in alcohol outlet density and alcohol-related harm to population health) considering the impact, over of a four year period, of a change in the density of outlets on alcohol consumption and health harms in Wales. An important part of the research will be mapping health data at a local level in relation to outlet density.

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)		
Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	Don't know <input type="checkbox"/>
If yes please specify which aspects in the box below (keeping your views to a maximum of 200 words)		
<p>There will be a need to provide clear guidance for licensing officials concerning the practicalities of how health information may be used when considering the introduction of a CIP. An evaluation commissioned by Alcohol Focus Scotland (2008) on the implementation of the Licensing (Scotland) Act 2005, which introduced protection of public health as a licensing objective, found that, although there was general support amongst licensing officials for the consideration of alcohol-related health harms, guidance was lacking in how this would translate to the micro level i.e. tying health data to specific streets and small geographical areas within a borough.</p> <p>Currently only the police can object to licence applications due to a CIP. This should be widened to allow all responsible authorities to object to an application. For example, if there is an identified health harm, health bodies are able to object on this basis.</p> <p>Rather than tying the consideration of health harm to CIPs, Alcohol Concern recommends including the protection of public health as a fifth licensing objective.</p>		

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.
<p>Health-harms data should always feed into licensing decision-making. Allowing licensing authorities to consider alcohol-related health harms will provide them with an additional, and much-needed, tool to proactively refuse new applications/extensions on the basis of local health considerations. Consequently, they will be enabled to more effectively control the availability of alcohol, and the density of outlets selling alcohol, within their locality. Increased availability of alcohol has been shown to exacerbate alcohol-related problems, whilst several international studies have shown a link between high outlet density and physical violence.^{xix}</p>

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 met key criteria for limited or incidental sales? (Please select one option in each row)

		Yes	No	Don't know
A	The provision should be limited to a specific list of certain types of business and the kinds of sales they make			
B	The provision should be available to all businesses providing they meet certain qualification criteria to be an ancillary seller			
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			

Consultation Question 17:

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

		Yes	No	Don't know
A	Accommodation providers, providing alcohol alongside accommodation as part of the contract –		X	
B	Hair and beauty salons providing alcohol alongside a hair or beauty treatment		X	
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		X	
D	Florists providing alcohol alongside the purchase of flowers		X	
E	Regular charitable events providing alcohol as part of the wider occasion		X	

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? Please write your suggestion in the box below, keeping your views to a maximum of 200 words)

Whilst we understand the reasoning behind a wish to reduce some of licensing requirements on 'ancillary sellers' of alcohol, Alcohol Concern is against these proposals. Alcohol cannot be considered a normal commodity, rather a toxic substance which can result in adverse health consequences even among those who do not have a longstanding or persistent drinking problem, as well as a cause of crime and anti-social behaviour. It is therefore right that vigorous procedures are in place to ensure that sale of alcohol is effectively regulated, even where such sales may not be regarded as part of the core business. Such procedures should not be regarded as 'burdens' but as a necessary tool to ensuring that sales of alcohol are undertaken responsibly and in accordance with the licensing objectives, and as a means of effectively controlling the availability of alcohol, a key mechanism in reducing alcohol-related harm. Alcohol Concern therefore recommends that no changes are made to this aspect of licensing procedure.

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)

Yes	No X	Don't know
Alcohol Concern recommends that no changes are made to this aspect of licensing procedure, for		

the reasons set out in our response to **Question 18** above. We are also concerned how “a small part of” in paragraph 9.6 will be defined, and what mechanisms would be implemented to ensure that ancillary sellers do not exceed the amount of alcohol they are permitted to sell. Rather than reducing burdens, this may create extra bureaucracy in monitoring the amount of alcohol sold in these circumstances.

Consultation Question 20:

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

		Yes	No	Don't know
A	Allow premises making ancillary sales to request in their premises licence application that the requirement for a personal licence holder be removed			
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			
C	Introduce a new light touch form of authorisation for premises making ancillary sales – an ‘ASN’ but with no requirement for a personal licence holder			

Consultation Question 21:

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

		Yes	No	Don't know
A	Allow premises making ancillary sales to request in their premises licence application that the requirement for a personal licence holder be removed	X		
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	X		
C	Introduce a new light touch form of authorisation for premises making ancillary sales – an ‘ASN’ but with no requirement for a personal licence holder	X		

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)

Alcohol Concern does not support proposals for a lighter touch authorisation.

A - Removing the need for a personal licence holder: It is essential that Police Officers, Fire Officers, and licensing officials can immediately identify the Designated Premises Supervisor as a person in a position of authority at any premises selling or supplying alcohol. This is to ensure that any licensing problems arising at a particular premise can be addressed swiftly by engaging with this key individual. A personal licence holder should continue to be required regardless of whether or not the sale of alcohol forms a central part of the premise's business.

B – Removing the need for a premises licence: Alcohol Concern does not support this proposal, for the reasons set out in our response to **Question 18** above. We are also concerned that removing the need to advertise will disadvantage local residents who may wish to object to additional premises being permitted to sell alcohol in their area. Alcohol Concern does not support removing

one of the key mechanisms by which local residents are notified of, and can subsequently object to, premises wishing to sell alcohol in their community.

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)		
Yes	No X	Don't know

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)				
		Yes	No	Don't know
A	Reduce the burden			
B	Increase the burden			

Consultation Question 25: Should the number of TENs which can be given in respect of individual premises be increased? (Please select one option)		
Yes	No X	Don't know

Consultation Question 26: If yes, please select one option to indicate which you would prefer:	
15	
18	
Don't know	

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)				
		Yes	No	Don't know
A	Determining that premises in certain areas are exempt		X	
B	Determining that certain areas are exempt in their local area		X	

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)				
		Yes	No	Don't know
A	Motorway services should receive a nationally prescribed exemption from regulations for the provision of late night refreshment	X		

Consultation Question 29: Please describe any other types of premises to which you think a nationally prescribed exemption should apply (keeping your views to a maximum of 100 words)				
--	--	--	--	--

Alcohol Concern does not support a nationally prescribed exemption to any additional types of premises.

Consultation Question 30: Do you agree with each of the following proposals? (Please select one option in each row)				
		Yes	No	Don't know
A	Remove the requirements to advertise licensing applications in local newspapers			
B	Remove the centrally imposed prohibition on the sale of alcohol at MSA's for the on and off trade		X	
C	Remove the centrally imposed prohibition on the sale of alcohol at MSA's but only in respect of overnight accommodation – "lodges"		X	
D	Remove or simplify requirements to renew personal licences under the 2003 Act		X	

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)				
		Yes	No	Don't know
A	Remove the requirements to advertise licensing applications in local newspapers			
B	Remove the centrally imposed prohibition on the sale of alcohol at MSA's for the on and off trade		X	
C	Remove the centrally imposed prohibition on the sale of alcohol at MSA's but only in respect of overnight accommodation – "lodges"		X	
D	Remove or simplify requirements to renew personal licences under the 2003 Act		X	

Consultation Question 32: Do you think that the following measures would impact adversely on one or more of the licensing objectives? (Please select one option in each row)				
		Yes	No	Don't know
A	Remove the requirements to advertise licensing applications in local newspapers			X
B	Remove the centrally imposed prohibition on the sale of alcohol at MSA's for the on and off trade	X		
C	Remove the centrally imposed prohibition on the sale of alcohol at MSA's but only in respect of overnight accommodation – "lodges"	X		
D	Remove or simplify requirements to renew personal licences under the 2003 Act	X		

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)	
We think it should be as easy as possible for members of the public to make their views known on	

licensing applications and decision making and suggest this process is determined locally. Any system should seek to engage the public as much as possible through whatever means is most successful.

We do not support removing the prohibition of alcohol sales at motorway service areas. Indeed, it would be in the best interests of all road users to dissociate alcohol completely from driving, given that there were nearly 10,000 drink-drive casualties in Great Britain in 2011.^{xx}

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)

		Yes	No	Don't know
A	Minimum unit pricing			
B	Multi-buy promotions			
C	Health as an objective for cumulative impact			
D	Ancillary sales of alcohol			
E	Temporary Event Notices			
F	Late night refreshment			
G	Removing the duty to advertise licensing applications in local newspapers			
H	Sales of alcohol at motorway service stations			
I	Personal licences			

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.

Yes X No Don't know

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).

A minimum unit price for alcohol

The Impact Assessment does not explain why 45p has been chosen as the recommended minimum price. The House of Commons Health Committee report on the Government's Alcohol Strategy states that "If the minimum unit price in England were to be fixed at a different level to that in Scotland, we would expect the evidence supporting that decision to be set out clearly"^{xxi}

The Impact Assessment uses new methodology to work out the benefits of a MUP of 45p but provides no comparison of alternative levels of MUP such as 50p. While we understand that the new methodology takes account of inflation the Impact Assessment should have published the proposed benefits of a 50p MUP.

Health as an objective for cumulative impact

p7: Alcohol Concern is supportive in enabling local authorities to take wider alcohol-related health harm into account in licensing decisions. Outlet density is linked to increased rates of consumption and alcohol-related violence, and research commissioned by Alcohol Concern shows a positive correlation between the density of off-licensed premises and harm from alcohol in underage drinkers.^{xxii} Heavy drinking, however, does not just occur in areas of high outlet density. A survey carried out in Wales by Alcohol Concern found that 50% of drinkers only ever drink alcohol at home, and these are likely to be spread out across the licensing authority area. Moreover, some local authorities in England and Wales have chosen not to implement cumulative impact policies in their areas. Given the well-documented health risks of regularly consuming above recommended guidelines, Alcohol Concern recommends introducing the protection of public health as a fifth

licensing objective, which would be more effective than restricting consideration to cumulative impact areas and applicable to all local authorities.

Ancillary sellers

p8: An outcome of Option 2 will be up to 9,116 new premises with the ability to sell alcohol. If this figure is accurate, it will likely represent a significant increase the availability of alcohol. A recent review of the most effective mechanisms to achieve a positive change in our drinking culture noted that previous relaxations in licensing laws governing availability have probably been a major factor in increased alcohol consumption and related harms.^{xxiii} Any measures likely to increase the availability of alcohol within communities would therefore be unwise.

-
- ⁱ Purshouse, R. et al. (2009) *Modelling to assess the effectiveness and cost-effectiveness of public health related strategies and intervention to reduce alcohol attributable harm in England using the Sheffield Alcohol Policy Model version 2.0 Report to the Public Health Development Group*, Sheffield, University of Sheffield
- ⁱⁱ Donaldson, L (2009) *150 years of the Annual Report of the Chief Medical Officer: On the state of public health 2008* London, Department of Health
- ⁱⁱⁱ House of Commons Health Committee (2012) *Third Report of Session 2012-13: Government's Alcohol Strategy* London, The Stationery Office
- ^{iv} Rehm J. et al (2004) Alcohol Use In: Ezzati M et al (eds.) *Comparative Quantification of Health Risks: Global and regional burden of disease attributable to selected major risk factors* Geneva: World Health Organisation.
- ^v NHS Information Centre (2012) *Statistics on Alcohol: England 2012* Health and Social Care Information Centre
- ^{vi} BMA Board of Science (2012) *Reducing the affordability of alcohol*, London
- ^{vii} op cit. Purhouse, R. et al (2009) *Modelling to assess the effectiveness and cost-effectiveness of public health related strategies and intervention to reduce alcohol attributable harm in England using the Sheffield Alcohol Policy Model version 2.0 Report to the Public Health Development Group*
- ^{viii} Ibid
- ^{ix} Ibid
- ^x British Institute of Innkeeping (2012) available from <http://www.morningadvertiser.co.uk/General-News/Majority-of-publicans-back-plans-for-minimum-pricing-of-alcohol> [Accessed 14/01/13], Balance (2012) Publican Survey, available from <http://www.balancenortheast.co.uk/latest-news/landlords-call-time-on-cheap-alcohol>, [Accessed 14/01/13] Alcohol Concern Cymru (2012) available from <http://www.alcoholconcern.org.uk/projects/alcohol-concern-cymru/news/Welsh-pubs-back-plans-for-minimum-alcohol-price> [Accessed 14/01/13]
- ^{xi} Alcohol Concern and Balance North East (2012) *Binge Alcohol Concern and Balance North East*
- ^{xii} Purshouse, R. Et al (2009b) *Model based appraisal of alcohol minimum pricing and off-licensed trade discount bans in Scotland*, Sheffield, University of Sheffield
- ^{xiii} Department of Health (2009) *Signs for Improvement: Commissioning intervention to improve alcohol-related harm* London, Department of Health
- ^{xiv} Varsity online, available from <http://www.partyatthepub.co.uk/bars/Cardiff/promotions/> [Accessed 08/01/2013].
- ^{xv} Fat Cat Bars online, available from <http://www.fatcatcafebars.co.uk/fat-cat-events/ladies-night-offer/> [Accessed 11/12/2012].
- ^{xvi} Alcohol Concern Cymru (2010) *What's the damage? Irresponsible alcohol promotions in the night-time economy in Wales*, London, Alcohol Concern.
- ^{xvii} Alcohol Concern Cymru (2012) *Full to the brim? Outlet density and alcohol-related harm*, London, Alcohol Concern.
- ^{xviii} Hughes, K. et al. (2008) *Alcohol, nightlife and violence: The relative contributions of drinking before and during nights out to negative health and criminal justice outcomes*, *Addiction*, 103(1), pp60-65.
- ^{xix} op cit. Alcohol Concern Cymru (2012) *Full to the brim?*
- ^{xx} Department for Transport (2012) *Reported drinking and driving*, online, available from <https://www.gov.uk/government/statistical-data-sets/ras51-reported-drinking-and-driving> [Accessed 09/01/2012].
- ^{xxi} op cit. House of Commons Health Committee (2012) *Third Report of Session 2012-13: Government's Alcohol Strategy*
- ^{xxii} Alcohol Concern (2011) *One on every corner: The relationship between off-licence density and alcohol harms in young people*, London, Alcohol Concern.
- ^{xxiii} Bailey, J. et al. (2011) *Achieving positive change in the drinking culture of Wales*, London, Alcohol Concern, ppvii-viii.