



JR/TH

29 January 2013

Alcohol Strategy Consultation
4th Floor Fry
2 Marsham Street
LONDON
SW1P 4DF

Dear Sirs

“A consultation on delivering the Government's policies to cut alcohol fuelled crime and anti-social behaviour”

I am writing on behalf of Northumberland County Council, in response to the above consultation. The Council's response to each of the five areas, being consulted upon, is set out below for your consideration.

The issue of Minimum Unit Pricing has been discussed at considerable length with a range of expert witnesses, in a public debate held by the Communities and Place Overview and Scrutiny Committee. A report was submitted to Executive who endorsed the recommendations of the Committee. I would ask you to consider the attached report at Appendix One together with the comments in the first paragraph below.

1. A minimum unit price for alcohol

The Government is committed to introducing a minimum unit price for alcohol in England and Wales. The consultation states that they want to ensure that the chosen 45p minimum unit price (MUP) level is targeted and proportionate, whilst achieving a significant reduction of harm. The consultation asks questions in relation to three areas: 1) The price level; 2) The mechanism for adjusting the price over time; and 3) The impact of a minimum unit price.

Northumberland County Council has considered the evidence demonstrating a relationship between cost, consumption and alcohol-related harm such that the Council calls for a higher level than 45p to be set. The purpose of minimum unit



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pricing is to reduce excessive alcohol consumption, by linking the price of alcohol to its strength. The Council supports a MUP of 50p as the actual impact of minimum unit pricing will depend on the price per unit of alcohol. The previous Chief Medical Officer called for a 50p MUP of alcohol in 2008 which at today's value would be around 54p. Further, consideration needs to be given to cross-border purchases if a minimum unit price, below that proposed for Scotland (50p) is set. This will protect vulnerable younger and heavier drinkers who are more likely to drink cheap alcohol. The decision about a MUP should be made based upon the evidence base for greatest impact. In addition the council feels that more work need to be undertaken to educate the public on the concept of alcohol units and the content of alcoholic drinks.

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

The Government is concerned that these promotions contribute to the availability of irresponsibly priced alcohol, particularly through promotions which encourage large volumes of alcohol to be purchased. The aim of a ban 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 consultation asks questions in relation to two areas: 1) Whether to introduce a ban on multi-buy promotions. 2) The impact of such a ban.

Northumberland County Council considers that multi-buy promotions contribute to the availability of irresponsibly priced alcohol, particularly through promotions which encourage large volumes of alcohol to be purchased. The Council supports a ban which would 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.

There should be a ban on multi-buy promotions involving alcohol in the off-trade, and this should also include deals which are linked to discounting individual items. Cheap alcohol deals and the price differential between on- and off-trade, may result in people drinking more than intended, particularly young people as highlighted in the Alcohol Concern and Balance (regional alcohol office) research. In supermarkets, where most of this deep discounting occurs, alcohol is often used as a 'loss leader' to entice customers into the store. This means that food prices have to be increased to make up that lost income. In other words cheap alcohol is being subsidised by more expensive food. The council would prefer to see supermarkets reduce food prices and use income from more expensive alcohol to subsidise healthy food such as fruit and vegetables.

3. Reviewing the mandatory licensing conditions

In its response to the 'Rebalancing the Licensing Act' consultation in 2010, the Government committed to review the impact of the current mandatory licensing conditions. More recently, the Strategy made a commitment to review these mandatory licensing conditions to ensure they are sufficiently targeting problems

such as irresponsible promotions in pubs and clubs. Views are, therefore, sought on three areas: 1) The current set of mandatory licensing conditions; 2) Whether the current set of mandatory licensing conditions sufficiently targets problems such as irresponsible promotions in pubs and clubs; and 3) The application of the conditions to the on- and off-trade.

Northumberland County Council supports the recommendations of the Regional Alcohol Partnership; that no conditions should be removed from the mandatory licensing codes, this area of the consultation is being further considered by an expert licensing group for the Region.

4. Health as a licensing objective for cumulative impact policies (CIP)

The Government is proposing that licensing authorities will be able to take evidence of alcohol-related health harm into account in deciding whether to introduce a CIP – the consultation seeks views on two areas: 1) Introducing health as a licensing objective for cumulative impact policies; and 2) The impact of such a licensing objective for cumulative impact policies.

After consideration of the position of the Regional Alcohol Partnership, Northumberland County Council supports the proposal that alcohol-related health harms be taken into consideration by licensing authorities, but believes that this should not be tied only to cumulative impact policies. This area of the consultation has been considered by an expert licensing group in discussion with health partners.

5. Freeing up responsible businesses

The Government has committed to consult on giving licensing authorities greater freedom to take decisions that reflect the needs of their local community and seeks views on two areas 1): Proposals to develop a more targeted, proportionate and flexible licensing regime that can support responsible growth which maintains the integrity of the licensing system; and 2) The impact of these proposals on businesses and on the licensing objectives.

There are several areas in this section that cause concern in terms of further normalising alcohol as an everyday “commodity” i.e. the prospect of special provisions being granted that would allow alcohol to be sold alongside hair or beauty treatments, or alongside the purchase of flowers. The Council supports the recommendations of the Regional Alcohol Partnership in that no measures should be introduced, that will lead to an increase in alcohol consumption or that seeks to further promote the normalisation of alcohol. This area is being considered by an expert licensing group.



