

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?

Yes	✓	No	Don't Know
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If Yes please specify in the box below (keeping your views to a maximum of 100 words).

- The Under 18s will be better protected from the harm of alcohol by the introduction of MUP. Their access to alcohol (including the home) should reduce.
- The Sheffield Model estimated that a 50p MUP would result in a 7.3% reduction in alcohol consumption by 11-18 year olds. It also estimated that nearly 50% of the estimated 2.4% reduction in crime would be crime committed by 11-18 year olds.
- Complying with an MUP could be complicated and time consuming for small, independent On and Off licences as could 'policing' compliance unless product labelling is simplified, standardised and mandatory.

11, 13, 14

Consultation Question 5:

Do you think there should be a ban on multi-buy promotions involving alcohol in the off-trade?

Yes	✓	No	Don't Know
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Consultation Question 6:

Are there any further offers which should be included in a ban on multi-buy promotions?

Yes	✓	No	Don't Know
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If yes, please specify in the box below (keeping your views to a maximum of 100 words):

- Any ban on Multi-buy promotions for the Off-trade should also apply to the On-trade.
- Loyalty point schemes or money off coupons should not be linked to alcohol as this could indirectly result in the MUP being ineffective.
- Any offers or price reductions should ensure that the whole purchase does not result in a price that falls below the agreed MUP.

10, 14

Consultation Question 7:

Should other factors or evidence be considered when considering a ban on multi-buy promotions?

Yes	<input checked="" type="checkbox"/>	No	Don't Know
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If yes, please specify in the box below (keeping your views to a maximum of 200 words):

- Multi- buy promotions encourage people to buy more alcohol than they need resulting in access to more alcohol in the home. Work carried out by the North West Trading standards in 2011 showed that children access alcohol from the home more than anywhere else.
- Any reduction in consumption would improve health inequalities as demonstrated in a report by Alcohol Concern in 2011 which showed that lower income groups suffer greater alcohol health harms.
- Work carried out by Sheffield University shows that the effect of multi-promotions is greater if it is introduced with an MUP of 50p.

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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?

Yes	<input checked="" type="checkbox"/>	No	Don't Know
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If yes, please specify in the box below (keeping your views to a maximum of 100 words):

- A reduction in alcohol purchased will result in a reduction in the availability of alcohol in the home which will benefit Under 18s as this is their greatest source of alcohol.
- This may reduce binge drinking and pre loading in homes, reducing the demand on Cumbria Constabulary and local NHS (North West Public Health Observatory shows the rate of Under 18s in hospital with alcohol conditions is above national levels in Cumbria).
- On licences may benefit as the price of alcohol in the Off and On licence becomes more aligned and people may drink in pubs rather than the home.

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**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 & disorder	Public safety	Prevention of public nuisance	Protection of harm to children
A.	Irresponsible promotions	Yes	Yes	Yes	No
B.	Dispensing alcohol directly into the mouth	Yes	Yes	Yes	No
C.	Mandatory provision of free tap water	Yes	Yes	Yes	No
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?

Yes                      No                      ✓                      Don't Know

If no, please specify in the box below (keeping your views to a maximum of 100 words):

- 'Irresponsible promotion' in Paragraph 2 of Article 3 should mean 'any activity encouraging the sale of alcohol in a manner likely to lead or contribute to crime and disorder...etc. (it is currently limited to certain [described] activities if they carry a significant risk of disorder ...etc.).
- The time limit for reducing the price of alcohol to prevent 'happy hours' should be increased from 24hrs to not less than 72hrs (as in Scotland).
- The age at which people should be challenged (and have to provide I.D.) to confirm they are 18 should be extended from 18 to 25 years old.

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**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?

Yes

✓

No

Don't Know

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

Mandatory licencing conditions should include:

- Where door staff are required (either through local agreed licencing conditions or at a licensee's request) they should be trained to a recognised standard and should be clearly visible to and from members of the public by the use of a fluorescent jacket.
- There needs to be a national agreed ratio of seats to standing customers when deciding the capacity of a premise to prevent overcrowding.
- The proposed ban on multi-buy promotions should apply to the On trade (e.g. 2-4-1) as well as the Off trade.
- Loyalty point schemes that reward and encourage people to drink more should be banned.
- Point of sale information on the number of units of alcohol and the amount of energy (K joules/K calories) should be clearly displayed.
- All glass bottled drinks should be decanted from the bottle at the bar and no glass vessels should be used after a certain time (e.g. 11pm) to provide a safer drinking environment.

17, 26  
12, 37

**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?

Yes

No

✓

Don't Know

If no, please specify in the box below (keeping your views to a maximum of 100 words):

- The 2003 act should be amended so that the Secretary of State can prescribe as many mandatory licencing conditions as are necessary (currently a maximum of nine).
- All mandatory licencing conditions prescribed should apply to both the On trade and the Off trade to create consistency and fairness.
- The proposed ban on multi-buy promotions should apply to the On trade (e.g. 2-4-1) as well as the Off trade.

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**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.

The data obtained with the introduction of the 'Cardiff Model' would provide the sort of evidence that could be used to show alcohol related health harm. For example:

- Alcohol related admissions in hospitals including A&E departments
- Under 18s alcohol related admissions in hospitals including A&E departments
- The location of the incident that led to the alcohol related hospital admission
- The location of where the alcohol was obtained/purchased that led to the alcohol related hospital admission

Other evidence that could be used from other sources include:

- Police statistics on all alcohol related crime and disorder including antisocial behaviour, domestic violence and arrests
- General Practitioner data on acute and long term alcohol conditions in which alcohol is a contributing factor.

① 3, 4

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**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	Don't Know
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If yes, please specify in the box below (keeping your views to a maximum of 200 words).

- The use of agreed sources of alcohol related health harm evidence is set to be discretionary for licencing authorities when deciding to introduce a CIP. It should be an obligation to take into account any health related harm when introducing a CIP
- Currently only the Police can object to a licence application when there is a CIP in existence. All responsible authorities should have the authority to object to a licence application. For example if there are no crime objections but there are health objections then the relevant health body should be able to object on the grounds of a CIP

①

3, 16

**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.

- Often assaults go unreported to the police. Where there is saturation of licenced premises in a given area e.g. the Botchergate area of Carlisle then the data obtained from the local A&E department would show if there was a higher occurrence of alcohol related assaults reported to them from this location compared to other areas.
- The information obtained from alcohol related health harm could be used to improve the overall data picture on the effects of licenced premises in the Cumbria area. It would have an impact on other policy areas and licencing such as licence reviews. E.g. Where an individual licenced premises or area is identified as a high risk of alcohol related health harm

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**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):

		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.		No	
B.	The provision should be to all businesses providing they meet certain criteria to be an ancillary seller.	Yes		
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.	Yes		