

# Alcohol strategy consultation

User Details - 5452029

**Date Started:** 04/02/2013 08:24:34

**Date Ended:** 04/02/2013 09:07:10

**Time taken:** 42 mins, 36 secs

**IP Address:** n/a

**Unique ID:** n/a

## Page 1: About you

Q1. Please select if you would like your response or personal details to be treated as confidential.

*No Response*

Score

0

Q2. Which of the following best describes you or the professional interest you represent? Please select one option from the menu below.

Other

***Please specify which organisation, licensing authority or police force you represent in the box below:***  
Response on behalf of the Safer Leicester Partnership Alcohol Harm Reduction group. This is a multi agency group including public health local authority licensing police emergency services etc

Score

0

Q3. If you are responding on behalf of an organisation or interest group, please write in the box below the number of members in your group or organisation.

*No Response*

Q4. How did you obtain the views of your members? Please explain in the box below keeping your response to a maximum of 100 words.

Consultation document circulated to individual members for comment. meeting then held to discuss comments and collate response. Chair of group collated responses and submitted

Q5. Please indicate in which region you or your organisation is based. Please select one option from the menu below.

East Midlands

Score

0

Q6. If you are responding as a member of the public, what is your gender? Please select one option.

No Response

Score

0

Q7. If you are responding as a member of the public, what is your age? Please select one option.

No Response

Score

0

Page Score

0

## Page 2: A minimum unit price for alcohol

Q8. In the alcohol strategy, the government committed to introducing a minimum unit price for alcohol in England and Wales. This consultation will contribute to the debate on the most appropriate price per unit and the mechanism by which, once set, minimum unit pricing would remain effective. It is also an opportunity for interested parties to raise other issues around minimum unit pricing. The purpose of minimum unit pricing is to reduce alcohol consumption, particularly by the most hazardous and harmful drinkers who tend to show a preference for the cheapest alcohol products. By doing so the government estimates there will be a reduction in the associated crime and health harms, especially the numbers of hospital admissions, alcohol-related deaths and alcohol-related crimes. Minimum unit pricing is not intended disproportionately to affect responsible drinkers or particular social groups but to reduce the availability of alcohol sold at very low or heavily discounted prices. More information (including the definitions of hazardous and harmful drinkers) is available in the full consultation document and the impact assessment. Do you want to answer questions on minimum unit pricing? Please select one option.

Yes

Score

0

Page Score

0

## Page 3: A minimum unit price for alcohol

Q9. The impact of minimum unit pricing will depend on the price per unit of alcohol. The government wants to ensure that the chosen price level is targeted and proportionate, whilst achieving a significant reduction of harm. The government is therefore consulting on the introduction of a recommended minimum unit price of 45p. The government estimates a reduction in consumption across all product types of 3.3 per cent, a reduction in crime of 5,240 per year, a reduction in 24,600 alcohol-related hospital admissions and 714 fewer deaths per year after ten years. Do you agree that this minimum unit price level would achieve these aims? Please select one option.

Yes

Score

0

Q10. Should other factors or evidence be considered when setting a minimum unit price for alcohol? Please select one option.

Yes

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

There needs to be a strategy in place to deal with illegal/illicit alcohol sales and the sale of counterfeit alcohol as there is a real risk that this will increase as a consequence of MUP. There should be a review of the differential impact of MUP on low income moderate drinkers. A strategy based on pricing alone undersells the

Score

0

Q11. The government wishes to maintain the effectiveness of minimum unit pricing and is therefore proposing to adjust the minimum unit price level over time. 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

Score

0

Q12. 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

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

low income moderate drinkers - there needs to be a review to ensure that this group is not disproportionately affected by MUP. Evidence suggests that price has a direct impact on young people's drinking delaying when they start to drink which in turn has been shown to be protective of development of addiction

Score

0

Page Score

0

## Page 4: A ban on multi-buy promotions in the off-trade

Q13. The government is consulting on introducing a ban on multi-buy promotions in the off-trade (e.g. shops and off-licences) as part of its wider strategy to reduce excessive alcohol consumption, and alongside the introduction of a minimum unit price. A ban on multi-buy promotions would therefore not apply to pubs, clubs, bars or restaurants. The term 'multi-buy promotions' refers to alcohol promotions that offer a discount for buying multiple items. 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. As well as being part of a wider strategy to reduce consumption and tackle irresponsible alcohol sales, a ban on multi-buy promotions would also contribute to the government's aim of encouraging people to be aware of how much they drink and the risks of excessive drinking, so that they can make informed choices. The aim of this consultation is to assess support for such a ban and contribute to our understanding of the impact a ban on multi-buy promotions may have. The types of promotion it is proposed that a ban would include, are: two for the price of one, three for the price of two, buy one get one free, buy six and get 20 per cent off, 24 cans of lager costing less than 24 times the cost of a single 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, 3 for £10 where each bottle costs more than £3.33. More information is available in the full consultation document and the impact assessment. Do you want to answer questions on a ban on multi-buy promotions in the off-trade? Please select one option.

Yes

Score

0

Page Score

---

0

---

## Page 5: A ban on multi-buy promotions in the off-trade

---

Q14. Do you think there should be a ban on multi-buy promotions involving alcohol in the off-trade? Please select one option.

---

Yes

Score

0

---

---

Q15. Are there any further offers which should be included in a ban on multi-buy promotions? Please select one option.

---

Yes

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

It is arguable whether banning two for the price of one deals but allowing half price deals will have any differential impact. If half price offers are to be allowed it must not be possible for retailers to specify a minimum purchase number

Score

0

---

---

Q16. Should other factors or evidence be taken into account when considering a ban on multi-buy promotions? Please select one option.

---

Yes

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

advertising of special deals e.g. promotion of cheap beer to coincide with major sporting events such as football world cup etc.

Score

0

---

---

Q17. 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

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

low income moderate drinkers may be differentially affected by such a ban

Score

0

---

---

Page Score

0

---

## Page 6: Reviewing the mandatory licensing conditions

---

Q18. 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 alcohol 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. The government has also committed to consult on

---

whether these mandatory licensing conditions should, where relevant, apply to both the on- and off-trade. This consultation forms part of that review, and will contribute to the government's understanding of how these mandatory conditions are perceived. The five mandatory licensing conditions currently set out in regulations in relation to the supply of alcohol are: a ban on irresponsible promotions a ban on dispensing alcohol by one person directly into the mouth of another a requirement to provide free tap water on request to customers a requirement to have an age verification policy to prevent the sale of alcohol to persons under 18 years of age, and a requirement to make available to customers small measures such as half pints or beer or cider or 125ml glasses of wine More information is available in the full consultation document. An explanation of each of these terms can be found on page 20 of the consultation document, in the glossary at the end. Do you want to answer questions on reviewing the mandatory licensing conditions? Please select one option.

Yes

Score

0

Page Score

0

## Page 7: Reviewing the mandatory licensing conditions

Q19. Do you think each of the mandatory licensing conditions is effective in promoting the licensing objectives? For more information on the licensing objectives please see the glossary at the end of the full consultation document. Please select one option (Yes, No, Don't know) from each drop down menu.

	Prevention of crime and disorder	Public safety	Prevention of public nuisance	Protection of children from harm
<b>Irresponsible promotions</b>	Yes	Yes	Yes	No
<b>Dispensing alcohol directly into the mouth</b>	Don't know	Don't know	Don't know	Don't know
<b>Mandatory provision of free tap water</b>	No	No	No	No
<b>Age verification policy</b>	Yes	Yes	Yes	Yes
<b>Mandatory provision of small measures</b>	No	No	No	No

Score

0

Q20. Do you think that the mandatory licensing conditions do enough to target irresponsible promotions in pubs and clubs? Please select one option.

No

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

ambiguous wording is an issue &quot;irresponsible&quot; is open to wide interpretation; some conditions deal with matters that are not perceived as a problem locally (alcohol directly into the mouth) Should consider high cost of soft drinks, banning sale of multiple measures for the same price as a single - there should be a financial advantage to people who drink sensibly not just a punitive measure for those who don't. Should be a ban on promotions specifically targeted at young people e.g freshers offers

Score

0

Q21. Are there other issues related to the licensing objectives which could be tackled through a mandatory licensing condition? Please select one option.

Yes

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

pricing of soft drinks - these should not be more expensive than alcohol should not be able to offer a triple measure for the same price as a single measure

Score

0

Q22. Do you think that 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

Score

0

Page Score

0

## Page 8: Health as a licensing objective for cumulative impact policies

Q23. We want to ensure that licensing authorities are able to take alcohol-related health harms into consideration when making decisions about cumulative impact policies (CIPs) which can be used to manage problems linked to the density of premises in specific areas. 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. We are proposing 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. We expect that those areas with the highest levels of alcohol-related health harm, or fast rising levels of harm from alcohol, will be most likely to use this power. It 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. More information is available in the full consultation document and impact assessment. Do you want to answer questions on health as a licensing objective for cumulative impact policies? Please select one option.

Yes

Score

0

Page Score

0

## Page 9: Health as a licensing objective for cumulative impact policies

Q24. 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):

chronic liver disease incidence

alcohol specific/alcohol attributable mortality  
Alcohol specific/alcohol attributable admission rates  
alcohol related A&E attendance  
Accidental injuries where alcohol is a contributing factor  
other injuries related to alcohol e.g. assault domestic violence suicide  
ambulance responses to alcohol attributable calls  
prevalence of mental health and alcohol dependency (dual diagnosis)  
prevalence of harmful/hazardous drinking  
prevalence of alcohol consumption in under 18's  
incidence of foetal alcohol syndrome  
prevalence of harmful drinking in pregnant women

Q25. 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

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

Currently CIP is imposed in areas where there is a high level of crime/anti social behaviour/public nuisance i.e. where alcohol is obtained. Health data highlights where those affected by alcohol live. Taking account of alcohol related harm affords the possibility of tackling areas of high alcohol harm not just nuisance.

Score

0

Q26. 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 your answer in the box below, providing evidence to support your response (keeping your views to a maximum of 200 words):

Currently CIP are in place of high alcohol related crime and disorder which generally (although not exclusively) tend to be in areas of the city centre.  
Health related harm data is available at ward level allowing us to identify those areas where there is the highest levels of alcohol related health harm, using this evidence would allow us to consider the value of introducing CIP in such areas. In particular it would allow us to review new applications in areas of high alcohol related health harms

Page Score

0

## Page 10: Freeing up responsible businesses

Q27. The government has committed to consult on giving licensing authorities greater freedom to take decisions that reflect the needs of their local community. Following the government's Red Tape Challenge in 2011, three areas of reform were specified: alcohol licensing for certain types of premises providing minimal alcohol sales, temporary event notices (TENs) and the licensing of late night refreshment. This section asks for views on these proposals and suggests further ways to reduce burdens on business. The proposals set out here can be seen alongside work undertaken by the Department for Culture, Media and Sport to remove unnecessary red tape from regulated entertainment. More information on each of these areas for reform is available in the full consultation document. There are five subjects covered in this section. They are: ancillary sales of alcohol occasional provision of licensable activities at community events an extension of the temporary event notice limit at individual premises late night refreshment, and further proposals to reduce burdens on business Do you want to answer questions on freeing up responsible businesses? Please select one option.

Yes

Score

0

## Page 11: Freeing up responsible businesses

Q28. Ancillary sales of alcohol For many businesses, the sale of alcohol is only a small part of, or incidental to, their wider activities, and occurs alongside the provision of another product or service (which this consultation refers to as an 'ancillary sale'). For example, a guesthouse might wish to provide wine to its guests with an evening meal or a complimentary bottle of wine in a guest's room, while a hairdresser might wish to offer clients a glass of wine. 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
<b>The provision should be limited to a specific list of certain types of business and the kinds of sales they make</b>	X		
<b>The provision should be available to all businesses providing they meet certain qualification criteria to be an ancillary seller</b>		X	
<b>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 the above options</b>		X	

Score

0

Q29. If special provisions 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.

	Yes	No	Don't know
<b>Accommodation providers, providing alcohol alongside accommodation as part of the contract</b>		X	
<b>Hair and beauty salons, providing alcohol alongside a hair or beauty treatment</b>	X		
<b>Florists, providing alcohol alongside the purchase of flowers</b>	X		
<b>Cultural organisations, such as theatres, cinemas and museums, providing alcohol alongside cultural events as part of the entry ticket</b>		X	
<b>Regular charitable events, providing alcohol as part of the wider occasion</b>		X	

Score

0

Q30. 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 suggestions in the box below, keeping your views to a maximum of 200 words:

to all questions answered yes above the proviso must be that there should be clearly defined criteria to avoid abuse and consideration needs to be given to how these businesses would be monitored

Q31. 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. Alternatively, a second option is to broaden the definition of 'ancillary sales' to include all businesses (and/or not for profit activities) through the use of a general set of qualification criteria, for example, to the effect that: alcohol must be sold or supplied as a small part or proportion of a sales transaction or contract for a wider service, and the amount of alcohol that could be supplied as part of that contract cannot exceed a prescribed amount. Do you think that the qualification criteria proposed meet this aim?

No

**Please use the space below to provide further comments (keeping your views to a maximum of 200 words):**

too much scope for loopholes e.g. what is meant by 'small part' of sales transaction? what is to stop a business or organisation terming an event 'charitable'; what is to stop someone selling alcohol alongside a 50p bunch of flowers or a cut price beauty treatment.

Score

0

Q32. 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
<b>Allow premises making ancillary sales to request in their premises licence application that the requirement for a personal licence holder be removed</b>	X		
<b>Introduce a new, light-touch form of authorisation for premises making ancillary sales - an ASN but retaining the need for a personal licence holder</b>	X		
<b>Introduce a new, light touch form of authorisation for premises making ancillary sales - an ASN - with no requirement for a personal licence holder</b>	X		

Score

0

Q33. Do you think these proposals would impact adversely on one or more of the licensing objectives? Please select one option.

	Yes	No	Don't know
<b>Allow premises making ancillary sales to request in their premises licence application that the requirement for a personal licence holder be removed</b>	X		
<b>Introduce a new, light-touch form of authorisation for premises making ancillary sales - an ASN but retaining the need for a personal licence holder</b>	X		
<b>Introduce a new, light touch form of authorisation for premises making ancillary sales - an ASN - with no requirement for a personal licence holder</b>	X		

Score

0

Q34. 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 response to a maximum of 200 words:

allowing the above would mean that there need not be anybody involved who knows anything about the licensing objectives it would also mean that only the police and the noise team could make representation

there needs to be a clear definition of when such an exemption should apply to avoid creation of loopholes.

there needs to be clear processes for monitoring/regulating the system. Setting of arbitrary thresholds in deciding whether an exemption applies or not risks legal challenge which is time consuming and costly. Licensing authorities must retain the power to revoke/dis-apply exemptions as part of the initial application and subsequently through review

---

Page Score

0

---

## Page 12: Freeing up responsible businesses

Q35. 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.

No

Score

0

---

Q36. 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
Reduce the burden	X		
Increase the burden	X		

Score

0

---

---

Page Score

0

---

## Page 13: Freeing up responsible businesses

Q37. Should the number of TENs which can be given in respect of individual premises be increased? Please select one option.

No

Score

0

---

Q38. If you answered yes, please select one option to indicate which you would prefer. Please select one option.

*No Response*

Score

0

---

---

Page Score

0

---

## Page 14: Freeing up responsible businesses

Q39. 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
Determining that premises in certain areas are exempt		X	
Determining that certain premises types are exempt in their local area		X	
Score			
0			

Q40. 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

Score
0

Q41. 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).

*No Response*

Page Score
0

## Page 15: Freeing up responsible businesses

Q42. Do you agree with each of the following proposals? Please select one option in each row.

	Yes	No	Don't know
Remove requirements to advertise licensing applications in local newspapers	X		
Remove the centrally imposed prohibition on the sale of alcohol at MSAs for the on and off-trade	X		
Remove the centrally imposed prohibition on the sale of alcohol at MSAs, but only in respect of overnight accommodation - lodges	X		
Remove or simplify requirements to renew personal licences under the 2003 Act		X	
Score			
0			

Q43. 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
Remove requirements to advertise licensing applications in local newspapers	X		
Remove the centrally imposed prohibition on the sale of alcohol at MSAs for the on and off-trade	X		
Remove the centrally imposed prohibition on the sale of alcohol at MSAs, but only in respect of overnight accommodation - lodges	X		
Remove or simplify requirements to renew personal licences under the 2003 Act		X	
Score			
0			

Q44. 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.

	Yes	No	Don't know
Remove requirements to advertise licensing applications in local newspapers		X	
Remove the centrally imposed prohibition on the sale of alcohol at MSAs for the on and off-trade		X	
Remove the centrally imposed prohibition on the sale of alcohol at MSAs, but only in respect of overnight accommodation - lodges		X	
Remove or simplify requirements to renew personal licences under the 2003 Act	X		
Score			
0			

Q45. 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 keep your views to a maximum of 200 words.)

*No Response*

Page Score  
0

## Page 16: Impact assessments

Q46. Impact assessments for the proposals in this consultation have been published alongside the full consultation document. 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
Minimum unit pricing	X		
Multi-buy promotions		X	

Health as a licensing objective for cumulative impact			X
Ancillary sales of alcohol			X
Temporary event notices		X	
Late night refreshment			X
Removing the duty to advertise licence applications in a local newspaper	X		
Sales of alcohol at motorway service stations	X		
Personal licences		X	

Score

0

Q47. Do you have any comments on the methodologies or assumptions used in the impact assessments? If yes, please specify in the box below, clearly referencing the impact assessment and page to which you refer (keeping your views to a maximum of 400 words).

*No Response*

Page Score

0

## Scoring Summary

Pages	Total
1. About you	0
2. A minimum unit price for alcohol	0
3. A minimum unit price for alcohol	0
4. A ban on multi-buy promotions in the off-trade	0
5. A ban on multi-buy promotions in the off-trade	0
6. Reviewing the mandatory licensing conditions	0
7. Reviewing the mandatory licensing conditions	0
8. Health as a licensing objective for cumulative impact policies	0
9. Health as a licensing objective for cumulative impact policies	0
10. Freeing up responsible businesses	0
11. Freeing up responsible businesses	0
12. Freeing up responsible businesses	0
13. Freeing up responsible businesses	0
14. Freeing up responsible businesses	0
15. Freeing up responsible businesses	0
16. Impact assessments	0

Total Survey Score:	0
---------------------	---

# Alcohol strategy consultation

User Details - 5452474

**Date Started:** 04/02/2013 09:19:52    **Date Ended:** 04/02/2013 09:38:10

**Time taken:** 18 mins, 18 secs    **IP Address:** n/a

**Unique ID:** n/a

## Page 1: About you

Q1. Please select if you would like your response or personal details to be treated as confidential.

**No Response**

Score

0

Q2. Which of the following best describes you or the professional interest you represent? Please select one option from the menu below.

Bodies representing public sector professionals (eg Local Government Association, Institute of Licensing)

***Please specify which organisation, licensing authority or police force you represent in the box below:***

Trading Standards North West

Score

0

Q3. If you are responding on behalf of an organisation or interest group, please write in the box below the number of members in your group or organisation.

300

Q4. How did you obtain the views of your members? Please explain in the box below keeping your response to a maximum of 100 words.

Discussion via e mail

Q5. Please indicate in which region you or your organisation is based.

Please select one option from the menu below.

North West England

Score

0

Q6. If you are responding as a member of the public, what is your gender? Please select one option.

**No Response**

Score

0

Q7. If you are responding as a member of the public, what is your age?

Please select one option.

**No Response**

Score

0

Page Score

0

## Page 2: A minimum unit price for alcohol

Q8. In the alcohol strategy, the government committed to introducing a minimum unit price for alcohol in England and Wales. This consultation will contribute to the debate on the most appropriate price per unit and the mechanism by which, once set, minimum unit pricing would remain effective. It is also an opportunity for interested parties to raise other issues around minimum unit pricing. The purpose of minimum unit pricing is to reduce alcohol consumption, particularly by the most hazardous and harmful drinkers who tend to show a preference for the cheapest alcohol products. By doing so the government estimates there will be a reduction in the associated crime and health harms, especially the numbers of hospital admissions, alcohol-related deaths and alcohol-related crimes. Minimum unit pricing is not intended disproportionately to affect responsible drinkers or particular social groups but to reduce the availability of alcohol sold at very low or heavily discounted prices. More information (including the definitions of hazardous and harmful drinkers) is available in the full consultation document and the impact assessment. Do you want to answer questions on minimum unit pricing? Please select one option.

Yes

Score

0

Page Score

0

## Page 3: A minimum unit price for alcohol

Q9. The impact of minimum unit pricing will depend on the price per unit of alcohol. The government wants to ensure that the chosen price level is targeted and proportionate, whilst achieving a significant reduction of harm. The government is therefore consulting on the introduction of a recommended minimum unit price of 45p. The government estimates a reduction in consumption across all product types of 3.3 per cent, a reduction in crime of 5,240 per year, a reduction in 24,600 alcohol-related hospital admissions and 714 fewer deaths per year after ten years. Do you agree that this minimum unit price level would achieve these aims? Please select one option.

Yes

***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):***

Trading Standards North West (TSNW) support the 24 Directors of Public

Health in our region who are looking for a minimum unit price of at least 50p. TSNW are unaware of any independent research into a 45p minimum price and would refer to the ScHARR model proposed by the University of Sheffield which found that a 50p price level would after 10 years lead to a saving of over 3000 lives and a reduction in numbers of crimes committed by 42,500

Score

0

Q10. Should other factors or evidence be considered when setting a minimum unit price for alcohol? Please select one option.

Yes

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

The Scottish Government is proposing a minimum unit price of 50p which would create a serious cross border issue in the North West if the price here were 45p. Pubs and other on-licensed premises would benefit greatly from a minimum price as it would reduce the differential in prices between the on and off licensed trade.

Score

0

Q11. The government wishes to maintain the effectiveness of minimum unit pricing and is therefore proposing to adjust the minimum unit price level over time. 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 automatically be updated in line with inflation each year

Score

0

Q12. 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

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

Children and young people would be better protected from alcohol harms by reducing access to pocket-money priced alcohol. In the 2011 TSNW Children's Survey, 13% of 14 year olds and a massive 57% of 17 year olds were able to purchase alcohol themselves. 23% of 14 to 17 year olds claimed to drink more than 20 units per week. Drinkers and non-drinkers would benefit as alcohol harm costs the North West more than £3 billion per year; frontline workers would benefit from less drunken violence and fear of crime may reduce.

Score

0

Page Score

0

## Page 4: A ban on multi-buy promotions in the off-trade

Q13. The government is consulting on introducing a ban on multi-buy promotions in the off-trade (e.g. shops and off-licences) as part of its wider strategy to reduce excessive alcohol consumption, and alongside the introduction of a minimum unit price. A ban on multi-buy promotions would therefore not apply to pubs, clubs, bars or restaurants. The term 'multi-buy promotions' refers to alcohol promotions that offer a discount for buying multiple items. 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. As well as being part of a wider strategy to reduce consumption and tackle irresponsible alcohol sales, a ban on multi-buy promotions would also contribute to the government's aim of encouraging people to be aware of how much they drink and the risks of excessive drinking, so that they can make informed choices. The aim of this consultation is to assess support for such a ban and contribute to our understanding of the impact a ban on multi-buy promotions may have. The types of promotion it is proposed that a ban would include, are: two for the price of one, three for the price of two, buy one get one free, buy six and get 20 per cent off, 24 cans of lager costing less than 24 times the cost of a single 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, 3 for £10 where each bottle costs more than £3.33. More information is available in the full consultation document and the impact assessment. Do you want to answer questions on a ban on multi-buy promotions in the off-trade? Please select one option.

Yes

Score

0

Page Score

0

## Page 5: A ban on multi-buy promotions in the off-trade

Q14. Do you think there should be a ban on multi-buy promotions involving alcohol in the off-trade? Please select one option.

Yes

Score

0

Q15. Are there any further offers which should be included in a ban on multi-buy promotions? Please select one option.

Yes

*If yes, please specify in the box below (keeping your views to a*

**maximum of 100 words):**

Buying goods or services and getting alcohol discounted or free Multi-buy promotions in the on-licensed trade should end for consistency with the off trade

Score

0

Q16. Should other factors or evidence be taken into account when considering a ban on multi-buy promotions? Please select one option.

Yes

**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 intend resulting in easier access in the home environment. In the last TSNW Children's Survey in 2011, 55% of 14 to 17 year olds reported obtaining the alcohol they drank from their parents. Trading Standards needs a strengthened funded operation to monitor and enforce a multi-buy ban effectively

Score

0

Q17. 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

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

Children would be further protected by harm from a reduction in the amount of alcohol kept in the home and continued denormalisation of drinking alcohol

Score

0

Page Score

0

## **Page 6: Reviewing the mandatory licensing conditions**

Q18. 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 alcohol 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. The government has also committed to consult on whether these mandatory licensing conditions should, where relevant, apply to both the on- and off-trade. This consultation forms part of that review, and will contribute to the government's understanding of how these mandatory conditions are

perceived. The five mandatory licensing conditions currently set out in regulations in relation to the supply of alcohol are: a ban on irresponsible promotions a ban on dispensing alcohol by one person directly into the mouth of another a requirement to provide free tap water on request to customers a requirement to have an age verification policy to prevent the sale of alcohol to persons under 18 years of age, and a requirement to make available to customers small measures such as half pints or beer or cider or 125ml glasses of wine More information is available in the full consultation document. An explanation of each of these terms can be found on page 20 of the consultation document, in the glossary at the end. Do you want to answer questions on reviewing the mandatory licensing conditions? Please select one option.

No

Score

0

Page Score

0

## Page 7: Reviewing the mandatory licensing conditions

Q19. Do you think each of the mandatory licensing conditions is effective in promoting the licensing objectives? For more information on the licensing objectives please see the glossary at the end of the full consultation document. Please select one option (Yes, No, Don't know) from each drop down menu.

*No Response*

Score

0

Q20. Do you think that the mandatory licensing conditions do enough to target irresponsible promotions in pubs and clubs? Please select one option.

*No Response*

Score

0

Q21. Are there other issues related to the licensing objectives which could be tackled through a mandatory licensing condition? Please select one option.

*No Response*

Score

0

Q22. Do you think that 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.

*No Response*

Score

0

Page Score

0

## Page 8: Health as a licensing objective for cumulative impact policies

Q23. We want to ensure that licensing authorities are able to take alcohol-related health harms into consideration when making decisions about cumulative impact policies (CIPs) which can be used to manage problems linked to the density of premises in specific areas. 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. We are proposing 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. We expect that those areas with the highest levels of alcohol-related health harm, or fast rising levels of harm from alcohol, will be most likely to use this power. It 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. More information is available in the full consultation document and impact assessment. Do you want to answer questions on health as a licensing objective for cumulative impact policies? Please select one option.

No

Score

0

Page Score

0

## Page 9: Health as a licensing objective for cumulative impact policies

Q24. 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):

*No Response*

Q25. 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.

*No Response*

Score

0

Q26. 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 your answer in the box below, providing evidence to support your response (keeping your views to a maximum of 200 words):

*No Response*

Page Score

0

## Page 10: Freeing up responsible businesses

Q27. The government has committed to consult on giving licensing authorities greater freedom to take decisions that reflect the needs of their local community. Following the government's Red Tape Challenge in 2011, three areas of reform were specified: alcohol licensing for certain types of premises providing minimal alcohol sales, temporary event notices (TENs) and the licensing of late night refreshment. This section asks for views on these proposals and suggests further ways to reduce burdens on business. The proposals set out here can be seen alongside work undertaken by the Department for Culture, Media and Sport to remove unnecessary red tape from regulated entertainment. More information on each of these areas for reform is available in the full consultation document. There are five subjects covered in this section. They are: ancillary sales of alcohol occasional provision of licensable activities at community events an extension of the temporary event notice limit at individual premises late night refreshment, and further proposals to reduce burdens on business Do you want to answer questions on freeing up responsible businesses? Please select one option.

No

Score

0

Page Score

0

## Page 11: Freeing up responsible businesses

Q28. Ancillary sales of alcohol For many businesses, the sale of alcohol is only a small part of, or incidental to, their wider activities, and occurs alongside the provision of another product or service (which this consultation refers to as an 'ancillary sale'). For example, a guesthouse might wish to provide wine to its guests with an evening meal or a complimentary bottle of wine in a guest's room, while a hairdresser might wish to offer clients a glass of wine. 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.

*No Response*

Score

0

Q29. If special provisions 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.

*No Response*

Score

0

Q30. 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 suggestions in the box below, keeping your views to a maximum of 200 words:

*No Response*

Q31. 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. Alternatively, a second option is to broaden the definition of 'ancillary sales' to include all businesses (and/or not for profit activities) through the use of a general set of qualification criteria, for example, to the effect that: alcohol must be sold or supplied as a small part or proportion of a sales transaction or contract for a wider service, and the amount of alcohol that could be supplied as part of that contract cannot exceed a prescribed amount. Do you think that the qualification criteria proposed meet this aim?

*No Response*

Score

0

Q32. Do you think that these proposals would significantly reduce the burdens on ancillary sellers? Please select one option in each row.

*No Response*

Score

0

Q33. Do you think these proposals would impact adversely on one or more of the licensing objectives? Please select one option.

*No Response*

Score

0

Q34. 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 response to a maximum of 200 words:

*No Response*

Page Score

0

## **Page 12: Freeing up responsible businesses**

Q35. 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.

*No Response*

Score

0

Q36. What impact do you think a locally determined notification would have on organisers of community events? Please select one option in each row.

*No Response*

Score

0

Page Score

0

## **Page 13: Freeing up responsible businesses**

Q37. Should the number of TENs which can be given in respect of individual premises be increased? Please select one option.

*No Response*

Score

0

Q38. If you answered yes, please select one option to indicate which you would prefer. Please select one option.

*No Response*

Score

0

Page Score

0

## **Page 14: Freeing up responsible businesses**

Q39. 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.

*No Response*

Score

0

Q40. 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.

*No Response*

Score

0

Q41. 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).

*No Response*

Page Score

0

## **Page 15: Freeing up responsible businesses**

Q42. Do you agree with each of the following proposals? Please select one option in each row.

*No Response*

Score

0

Q43. Do you think that each of the following would reduce the overall burdens on business? Please select one option in each row.

*No Response*

Score

0

Q44. 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.

*No Response*

Score

0

Q45. 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 keep your views to a maximum of 200 words.)

*No Response*

Page Score

0

## Page 16: Impact assessments

Q46. Impact assessments for the proposals in this consultation have been published alongside the full consultation document. 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
Minimum unit pricing		X	
Multi-buy promotions		X	
Health as a licensing objective for cumulative impact			X
Ancillary sales of alcohol			X
Temporary event notices			X
Late night refreshment			X
Removing the duty to advertise licence applications in a local newspaper			X

<b>Sales of alcohol at motorway service stations</b>			X
<b>Personal licences</b>			X

Score

0

Q47. Do you have any comments on the methodologies or assumptions used in the impact assessments? If yes, please specify in the box below, clearly referencing the impact assessment and page to which you refer (keeping your views to a maximum of 400 words).

TSNW feel that the Impact Assessment on Minimum Unit Pricing and on Multi-Buy Promotions does not take into account the considerable extra costs which will be incurred by Trading Standards Services in enforcing minimum unit pricing, sampling of product to ensure labelling is correct, and effective enforcement to ensure that illicit alcohol does not take over the market share of cheap alcohol, which would reverse the benefits. The costs of equipping Trading Standards Services to carry out these roles would be a tiny fraction of the money saved by reducing the health harms associated with cheap alcohol.

Page Score

0

## Scoring Summary

Pages	Total
1. About you	0
2. A minimum unit price for alcohol	0
3. A minimum unit price for alcohol	0
4. A ban on multi-buy promotions in the off-trade	0
5. A ban on multi-buy promotions in the off-trade	0
6. Reviewing the mandatory licensing conditions	0
7. Reviewing the mandatory licensing conditions	0
8. Health as a licensing objective for cumulative impact policies	0
9. Health as a licensing objective for	0

cumulative impact policies	
10. Freeing up responsible businesses	0
11. Freeing up responsible businesses	0
12. Freeing up responsible businesses	0
13. Freeing up responsible businesses	0
14. Freeing up responsible businesses	0
15. Freeing up responsible businesses	0
16. Impact assessments	0
<b>Total Survey Score:</b>	<b>0</b>

# Alcohol strategy consultation

User Details - 5452046

**Date Started:** 04/02/2013 08:27:00 **Date Ended:** 04/02/2013 09:38:53

**Time taken:** 1 hr, 11 mins, 53 secs **IP Address:** n/a

**Unique ID:** n/a

## Page 1: About you

Q1. Please select if you would like your response or personal details to be treated as confidential.

**No Response**

Score

0

Q2. Which of the following best describes you or the professional interest you represent? Please select one option from the menu below.

Other

***Please specify which organisation, licensing authority or police force you represent in the box below:***

Harrogate Sanctuary. Treatment for Women Misusing Alcohol

Score

0

Q3. If you are responding on behalf of an organisation or interest group, please write in the box below the number of members in your group or organisation.

**No Response**

Q4. How did you obtain the views of your members? Please explain in the box below keeping your response to a maximum of 100 words.

**No Response**

Q5. Please indicate in which region you or your organisation is based.

Please select one option from the menu below.

Yorkshire and the Humber

Score

0

Q6. If you are responding as a member of the public, what is your gender?

Please select one option.

Female

Score

0

Q7. If you are responding as a member of the public, what is your age?

Please select one option.

55-64

Score

0

Page Score

0

## Page 2: A minimum unit price for alcohol

Q8. In the alcohol strategy, the government committed to introducing a minimum unit price for alcohol in England and Wales. This consultation will contribute to the debate on the most appropriate price per unit and the mechanism by which, once set, minimum unit pricing would remain effective. It is also an opportunity for interested parties to raise other issues around minimum unit pricing. The purpose of minimum unit pricing is to reduce alcohol consumption, particularly by the most hazardous and harmful drinkers who tend to show a preference for the cheapest alcohol products. By doing so the government estimates there will be a reduction in the associated crime and health harms, especially the numbers of hospital admissions, alcohol-related deaths and alcohol-related crimes. Minimum unit pricing is not intended disproportionately to affect responsible drinkers or particular social groups but to reduce the availability of alcohol sold at very low or heavily discounted prices. More information (including the definitions of hazardous and harmful drinkers) is available in the full consultation document and the impact assessment. Do you want to answer questions on minimum unit pricing? Please select one option.

Yes

Score

0

Page Score

0

## Page 3: A minimum unit price for alcohol

Q9. The impact of minimum unit pricing will depend on the price per unit of alcohol. The government wants to ensure that the chosen price level is targeted and proportionate, whilst achieving a significant reduction of harm. The government is therefore consulting on the introduction of a recommended minimum unit price of 45p. The government estimates a reduction in consumption across all product types of 3.3 per cent, a reduction in crime of 5,240 per year, a reduction in 24,600 alcohol-related hospital admissions and 714 fewer deaths per year after ten years. Do you agree that this minimum unit price level would achieve these aims? Please select one option.

No

***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):***

Minimum pricing will have no effect on my demographic. Wine is the main drink of choice, and these women can quite easily afford it.

Score

0

Q10. Should other factors or evidence be considered when setting a minimum unit price for alcohol? Please select one option.

Yes

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

There should be far more effort put into establishing the type of drinkers who are doing the most harm and costing the most money. That group is middle aged, middle class causing themselves long term damage.

Score

0

Q11. The government wishes to maintain the effectiveness of minimum unit pricing and is therefore proposing to adjust the minimum unit price level over time. 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

Score

0

Q12. 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.

No

Score

0

Page Score

0

## **Page 4: A ban on multi-buy promotions in the off-trade**

Q13. The government is consulting on introducing a ban on multi-buy promotions in the off-trade (e.g. shops and off-licences) as part of its wider strategy to reduce excessive alcohol consumption, and alongside the introduction of a minimum unit price. A ban on multi-buy promotions would therefore not apply to pubs, clubs, bars or restaurants. The term 'multi-buy promotions' refers to alcohol promotions that offer a discount for buying multiple items. 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. As well as being part of a wider strategy to reduce consumption and tackle irresponsible alcohol sales, a ban on multi-buy promotions would also contribute to the government's aim of encouraging people to be aware of how much they drink and the risks of excessive drinking, so that they can make informed choices. The aim of this

consultation is to assess support for such a ban and contribute to our understanding of the impact a ban on multi-buy promotions may have. The types of promotion it is proposed that a ban would include, are: two for the price of one, three for the price of two, buy one get one free, buy six and get 20 per cent off, 24 cans of lager costing less than 24 times the cost of a single 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, 3 for £10 where each bottle costs more than £3.33. More information is available in the full consultation document and the impact assessment. Do you want to answer questions on a ban on multi-buy promotions in the off-trade? Please select one option.

Yes

Score

0

Page Score

0

## Page 5: A ban on multi-buy promotions in the off-trade

Q14. Do you think there should be a ban on multi-buy promotions involving alcohol in the off-trade? Please select one option.

Yes

Score

0

Q15. Are there any further offers which should be included in a ban on multi-buy promotions? Please select one option.

No

Score

0

Q16. Should other factors or evidence be taken into account when considering a ban on multi-buy promotions? Please select one option.

Yes

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

The entire marketing of alcohol in supermarkets needs to be reviewed, not just price

Score

0

Q17. 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

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

Those who shop regularly for their wine, it is part of their grocery shop,

acceptable and affordable. Every consumer whether rich or poor likes a bargain.

Score

0

Page Score

0

## Page 6: Reviewing the mandatory licensing conditions

Q18. 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 alcohol 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. The government has also committed to consult on whether these mandatory licensing conditions should, where relevant, apply to both the on- and off-trade. This consultation forms part of that review, and will contribute to the government's understanding of how these mandatory conditions are perceived. The five mandatory licensing conditions currently set out in regulations in relation to the supply of alcohol are: a ban on irresponsible promotions a ban on dispensing alcohol by one person directly into the mouth of another a requirement to provide free tap water on request to customers a requirement to have an age verification policy to prevent the sale of alcohol to persons under 18 years of age, and a requirement to make available to customers small measures such as half pints or beer or cider or 125ml glasses of wine More information is available in the full consultation document. An explanation of each of these terms can be found on page 20 of the consultation document, in the glossary at the end. Do you want to answer questions on reviewing the mandatory licensing conditions? Please select one option.

Yes

Score

0

Page Score

0

## Page 7: Reviewing the mandatory licensing conditions

Q19. Do you think each of the mandatory licensing conditions is effective in promoting the licensing objectives? For more information on the licensing objectives please see the glossary at the end of the full consultation document. Please select one option (Yes, No, Don't know) from each drop down menu.

	<b>Prevention of crime and disorder</b>	<b>Public safety</b>	<b>Prevention of public nuisance</b>	<b>Protection of children from harm</b>
<b>Irresponsible promotions</b>	Don't know	Don't know	Don't know	Don't know
<b>Dispensing alcohol directly into the mouth</b>	Don't know	Don't know	Don't know	Don't know
<b>Mandatory provision of free tap water</b>	Don't know	Don't know	Don't know	Don't know
<b>Age verification policy</b>	Don't know	Don't know	Don't know	Don't know
<b>Mandatory provision of small measures</b>	Don't know	Don't know	Don't know	Don't know

Score

0

Q20. Do you think that the mandatory licensing conditions do enough to target irresponsible promotions in pubs and clubs? Please select one option.

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):***

I am not a police man, and do not go to pubs.

Score

0

Q21. Are there other issues related to the licensing objectives which could be tackled through a mandatory licensing condition? Please select one option.

Don't know

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

As above. Home drinkers are my area of expertise

Score

0

Q22. Do you think that 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.

Don't know

Score

0

Page Score

0

## Page 8: Health as a licensing objective for cumulative impact policies

Q23. We want to ensure that licensing authorities are able to take alcohol-related health harms into consideration when making decisions about cumulative impact policies (CIPs) which can be used to manage problems linked to the density of premises in specific areas. 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. We are proposing 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. We expect that those areas with the highest levels of alcohol-related health harm, or fast rising levels of harm from alcohol, will be most likely to use this power. It 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. More information is available in the full consultation document and impact assessment. Do you want to answer questions on health as a licensing objective for cumulative impact policies? Please select one option.

No

Score

0

Page Score

0

## Page 9: Health as a licensing objective for cumulative impact policies

Q24. 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):

*No Response*

Q25. 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.

*No Response*

Score

0

Q26. 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 your answer in the box below, providing evidence to support your response (keeping your views to a maximum of 200 words):

**No Response**

Page Score

0

## Page 10: Freeing up responsible businesses

Q27. The government has committed to consult on giving licensing authorities greater freedom to take decisions that reflect the needs of their local community. Following the government's Red Tape Challenge in 2011, three areas of reform were specified: alcohol licensing for certain types of premises providing minimal alcohol sales, temporary event notices (TENs) and the licensing of late night refreshment. This section asks for views on these proposals and suggests further ways to reduce burdens on business. The proposals set out here can be seen alongside work undertaken by the Department for Culture, Media and Sport to remove unnecessary red tape from regulated entertainment. More information on each of these areas for reform is available in the full consultation document. There are five subjects covered in this section. They are: ancillary sales of alcohol occasional provision of licensable activities at community events an extension of the temporary event notice limit at individual premises late night refreshment, and further proposals to reduce burdens on business Do you want to answer questions on freeing up responsible businesses? Please select one option.

No

Score

0

Page Score

0

## Page 11: Freeing up responsible businesses

Q28. Ancillary sales of alcohol For many businesses, the sale of alcohol is only a small part of, or incidental to, their wider activities, and occurs alongside the provision of another product or service (which this consultation refers to as an 'ancillary sale'). For example, a guesthouse might wish to provide wine to its guests with an evening meal or a complimentary bottle of wine in a guest's room, while a hairdresser might wish to offer clients a glass of wine. 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.

**No Response**

Score

0

Q29. If special provisions 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.

*No Response*

Score

0

Q30. 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 suggestions in the box below, keeping your views to a maximum of 200 words:

*No Response*

Q31. 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. Alternatively, a second option is to broaden the definition of 'ancillary sales' to include all businesses (and/or not for profit activities) through the use of a general set of qualification criteria, for example, to the effect that: alcohol must be sold or supplied as a small part or proportion of a sales transaction or contract for a wider service, and the amount of alcohol that could be supplied as part of that contract cannot exceed a prescribed amount. Do you think that the qualification criteria proposed meet this aim?

*No Response*

Score

0

Q32. Do you think that these proposals would significantly reduce the burdens on ancillary sellers? Please select one option in each row.

*No Response*

Score

0

Q33. Do you think these proposals would impact adversely on one or more of the licensing objectives? Please select one option.

*No Response*

Score

0

Q34. 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 response to a maximum of 200 words:

*No Response*

Page Score

0

## Page 12: Freeing up responsible businesses

Q35. 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.

*No Response*

Score

0

Q36. What impact do you think a locally determined notification would have on organisers of community events? Please select one option in each row.

*No Response*

Score

0

Page Score

0

## Page 13: Freeing up responsible businesses

Q37. Should the number of TENs which can be given in respect of individual premises be increased? Please select one option.

*No Response*

Score

0

Q38. If you answered yes, please select one option to indicate which you would prefer. Please select one option.

*No Response*

Score

0

Page Score

0

## Page 14: Freeing up responsible businesses

Q39. 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.

*No Response*

Score

0

Q40. 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.

*No Response*

Score

0

Q41. 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).

*No Response*

Page Score

0

## Page 15: Freeing up responsible businesses

Q42. Do you agree with each of the following proposals? Please select

one option in each row.

*No Response*

Score

0

Q43. Do you think that each of the following would reduce the overall burdens on business? Please select one option in each row.

*No Response*

Score

0

Q44. 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.

*No Response*

Score

0

Q45. 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 keep your views to a maximum of 200 words.)

*No Response*

Page Score

0

## Page 16: Impact assessments

Q46. Impact assessments for the proposals in this consultation have been published alongside the full consultation document. 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
Minimum unit pricing		X	
Multi-buy promotions	X		
Health as a licensing objective for cumulative impact	X		
Ancillary sales of alcohol		X	
Temporary event notices		X	
Late night refreshment		X	
Removing the duty to advertise licence		X	

<b>applications in a local newspaper</b>			
<b>Sales of alcohol at motorway service stations</b>	X		
<b>Personal licences</b>		X	

Score

0

Q47. Do you have any comments on the methodologies or assumptions used in the impact assessments? If yes, please specify in the box below, clearly referencing the impact assessment and page to which you refer (keeping your views to a maximum of 400 words).

*No Response*

Page Score

0

## Scoring Summary

Pages	Total
1. About you	0
2. A minimum unit price for alcohol	0
3. A minimum unit price for alcohol	0
4. A ban on multi-buy promotions in the off-trade	0
5. A ban on multi-buy promotions in the off-trade	0
6. Reviewing the mandatory licensing conditions	0
7. Reviewing the mandatory licensing conditions	0
8. Health as a licensing objective for cumulative impact policies	0
9. Health as a licensing objective for cumulative impact policies	0
10. Freeing up responsible businesses	0
11. Freeing up responsible businesses	0
12. Freeing up responsible businesses	0

13. Freeing up responsible businesses	0
14. Freeing up responsible businesses	0
15. Freeing up responsible businesses	0
16. Impact assessments	0
<b>Total Survey Score:</b>	<b>0</b>

# Alcohol strategy consultation

---

User Details - 5452472

**Date Started:** 04/02/2013 09:19:45    **Date Ended:** 04/02/2013 09:41:51

**Time taken:** 22 mins, 6 secs    **IP Address:** n/a

**Unique ID:** n/a

---

## Page 1: About you

Q1. Please select if you would like your response or personal details to be treated as confidential.

Treat as confidential

***Please provide your reasons in the box below:***

Work for a regulatory body

Score

0

Q2. Which of the following best describes you or the professional interest you represent? Please select one option from the menu below.

Local government (other)

Score

0

Q3. If you are responding on behalf of an organisation or interest group, please write in the box below the number of members in your group or organisation.

**No Response**

Q4. How did you obtain the views of your members? Please explain in the box below keeping your response to a maximum of 100 words.

Individual views

Q5. Please indicate in which region you or your organisation is based. Please select one option from the menu below.

North West England

Score

0

Q6. If you are responding as a member of the public, what is your gender? Please select one option.

Female

Score

0

Q7. If you are responding as a member of the public, what is your age? Please select one option.

35-54

Score

0

Page Score

0

## Page 2: A minimum unit price for alcohol

Q8. In the alcohol strategy, the government committed to introducing a minimum unit price for alcohol in England and Wales. This consultation will contribute to the debate on the most appropriate price per unit and the mechanism by which, once set, minimum unit pricing would remain effective. It is also an opportunity for interested parties to raise other issues around minimum unit pricing. The purpose of minimum unit pricing is to reduce alcohol consumption, particularly by the most hazardous and harmful drinkers who tend to show a preference for the cheapest alcohol products. By doing so the government estimates there will be a reduction in the associated crime and health harms, especially the numbers of hospital admissions, alcohol-related deaths and alcohol-related crimes. Minimum unit pricing is not intended disproportionately to affect responsible drinkers or particular social groups but to reduce the availability of alcohol sold at very low or heavily discounted prices. More information (including the definitions of hazardous and harmful drinkers) is available in the full consultation document and the impact assessment. Do you want to answer questions on minimum unit pricing? Please select one option.

Yes

Score

0

Page Score

0

## Page 3: A minimum unit price for alcohol

Q9. The impact of minimum unit pricing will depend on the price per unit of alcohol. The government wants to ensure that the chosen price level is targeted and proportionate, whilst achieving a significant reduction of harm. The government is therefore consulting on the introduction of a recommended minimum unit price of 45p. The government estimates a reduction in consumption across all product types of 3.3 per cent, a reduction in crime of 5,240 per year, a reduction in 24,600 alcohol-related hospital admissions and 714 fewer deaths per year after ten years. Do you agree that this minimum unit price level would achieve these aims? Please select one option.

Yes

***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):***

I would recommend 50p per unit with the extra 50 being ring fenced financing of drink awareness training for adults and children under the age of 14

Score

0

Q10. Should other factors or evidence be considered when setting a minimum unit price for alcohol? Please select one option.

Yes

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

Climbing scale of cost per unit based on % vol

Score

0

Q11. The government wishes to maintain the effectiveness of minimum unit pricing and is therefore proposing to adjust the minimum unit price level over time. 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

Score

0

Q12. 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.

No

Score

0

Page Score

0

## **Page 4: A ban on multi-buy promotions in the off-trade**

Q13. The government is consulting on introducing a ban on multi-buy promotions in the off-trade (e.g. shops and off-licences) as part of its wider strategy to reduce excessive alcohol consumption, and alongside the introduction of a minimum unit price. A ban on multi-buy promotions would therefore not apply to pubs, clubs, bars or restaurants. The term 'multi-buy promotions' refers to alcohol promotions that offer a discount for buying multiple items. 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. As well as being part of a wider strategy to reduce consumption and tackle irresponsible alcohol sales, a ban on multi-buy promotions would also contribute to the government's aim of encouraging people to be aware of how much they drink and the risks of excessive drinking, so that they can make informed choices. The aim of this consultation is to assess support for such a ban and contribute to our understanding of the impact a ban on multi-buy promotions may have. The

types of promotion it is proposed that a ban would include, are: two for the price of one, three for the price of two, buy one get one free, buy six and get 20 per cent off, 24 cans of lager costing less than 24 times the cost of a single 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, 3 for £10 where each bottle costs more than £3.33. More information is available in the full consultation document and the impact assessment. Do you want to answer questions on a ban on multi-buy promotions in the off-trade? Please select one option.

Yes

Score

0

Page Score

0

## Page 5: A ban on multi-buy promotions in the off-trade

Q14. Do you think there should be a ban on multi-buy promotions involving alcohol in the off-trade? Please select one option.

Yes

Score

0

Q15. Are there any further offers which should be included in a ban on multi-buy promotions? Please select one option.

Yes

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

Linked promotions eg chocolates and wine at a special offer that reduces the price of the alcohol

Score

0

Q16. Should other factors or evidence be taken into account when considering a ban on multi-buy promotions? Please select one option.

Don't know

Score

0

Q17. 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.

No

Score

0

Page Score

0

## Page 6: Reviewing the mandatory licensing

## conditions

Q18. 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 alcohol 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. The government has also committed to consult on whether these mandatory licensing conditions should, where relevant, apply to both the on- and off-trade. This consultation forms part of that review, and will contribute to the government's understanding of how these mandatory conditions are perceived. The five mandatory licensing conditions currently set out in regulations in relation to the supply of alcohol are: a ban on irresponsible promotions, a ban on dispensing alcohol by one person directly into the mouth of another, a requirement to provide free tap water on request to customers, a requirement to have an age verification policy to prevent the sale of alcohol to persons under 18 years of age, and a requirement to make available to customers small measures such as half pints of beer or cider or 125ml glasses of wine. More information is available in the full consultation document. An explanation of each of these terms can be found on page 20 of the consultation document, in the glossary at the end. Do you want to answer questions on reviewing the mandatory licensing conditions? Please select one option.

Yes

Score

0

Page Score

0

## Page 7: Reviewing the mandatory licensing conditions

Q19. Do you think each of the mandatory licensing conditions is effective in promoting the licensing objectives? For more information on the licensing objectives please see the glossary at the end of the full consultation document. Please select one option (Yes, No, Don't know) from each drop down menu.

	Prevention of crime and disorder	Public safety	Prevention of public nuisance	Protection of children from harm
Irresponsible promotions	No	No	No	No
Dispensing alcohol directly into the mouth	No	No	No	Don't know

<b>Mandatory provision of free tap water</b>	Yes	Yes	Yes	Don't know
<b>Age verification policy</b>	Yes	Yes	Yes	Yes
<b>Mandatory provision of small measures</b>	Yes	Yes	Yes	Yes

Score

0

Q20. Do you think that the mandatory licensing conditions do enough to target irresponsible promotions in pubs and clubs? Please select one option.

No

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

There is not enough enforcement and monitoring of certain clubs and off licences that are known to be a source of irresponsible drinking and anti social behaviour

Score

0

Q21. Are there other issues related to the licensing objectives which could be tackled through a mandatory licensing condition? Please select one option.

Don't know

Score

0

Q22. Do you think that 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.

No

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

All should be the same

Score

0

Page Score

0

## Page 8: Health as a licensing objective for cumulative impact policies

Q23. We want to ensure that licensing authorities are able to take alcohol-related health harms into consideration when making decisions about cumulative impact policies (CIPs) which can be used to manage problems

linked to the density of premises in specific areas. 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. We are proposing 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. We expect that those areas with the highest levels of alcohol-related health harm, or fast rising levels of harm from alcohol, will be most likely to use this power. It 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. More information is available in the full consultation document and impact assessment. Do you want to answer questions on health as a licensing objective for cumulative impact policies? Please select one option.

Yes

Score

0

Page Score

0

## Page 9: Health as a licensing objective for cumulative impact policies

Q24. 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):

Anti social behaviour in specific areas, information for the police authority on areas where domestic abuse are linked to alcohol and areas around schools and colleges

Q25. 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

Score

0

Q26. 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 your answer in the box below, providing evidence to support your response (keeping your views to a maximum of 200 words):

No imediate impact as I assume that it could not be implimented retrospectively, but over time to reduce the number of off sites in particular

areas where evidence shows that alcohol abuse and antisocial behaviour based on alcohol consumption takes place

Page Score

0

## Page 10: Freeing up responsible businesses

Q27. The government has committed to consult on giving licensing authorities greater freedom to take decisions that reflect the needs of their local community. Following the government's Red Tape Challenge in 2011, three areas of reform were specified: alcohol licensing for certain types of premises providing minimal alcohol sales, temporary event notices (TENs) and the licensing of late night refreshment. This section asks for views on these proposals and suggests further ways to reduce burdens on business. The proposals set out here can be seen alongside work undertaken by the Department for Culture, Media and Sport to remove unnecessary red tape from regulated entertainment. More information on each of these areas for reform is available in the full consultation document. There are five subjects covered in this section. They are: ancillary sales of alcohol occasional provision of licensable activities at community events an extension of the temporary event notice limit at individual premises late night refreshment, and further proposals to reduce burdens on business Do you want to answer questions on freeing up responsible businesses? Please select one option.

Yes

Score

0

Page Score

0

## Page 11: Freeing up responsible businesses

Q28. Ancillary sales of alcohol For many businesses, the sale of alcohol is only a small part of, or incidental to, their wider activities, and occurs alongside the provision of another product or service (which this consultation refers to as an 'ancillary sale'). For example, a guesthouse might wish to provide wine to its guests with an evening meal or a complimentary bottle of wine in a guest's room, while a hairdresser might wish to offer clients a glass of wine. 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
<b>The provision should be limited to a specific list of certain types of business and the kinds of sales they make</b>	X		

<b>The provision should be available to all businesses providing they meet certain qualification criteria to be an ancillary seller</b>	X		
<b>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 the above options</b>	X		

Score

0

Q29. If special provisions 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.

	Yes	No	Don't know
<b>Accommodation providers, providing alcohol alongside accommodation as part of the contract</b>	X		
<b>Hair and beauty salons, providing alcohol alongside a hair or beauty treatment</b>		X	
<b>Florists, providing alcohol alongside the purchase of flowers</b>	X		
<b>Cultural organisations, such as theatres, cinemas and museums, providing alcohol alongside cultural events as part of the entry ticket</b>	X		
<b>Regular charitable events, providing alcohol as part of the wider occasion</b>	X		

Score

0

Q30. 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 suggestions in the box below, keeping your views to a maximum of 200 words:

**No Response**

Q31. 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. Alternatively, a second option is to broaden the definition of 'ancillary sales' to include all businesses (and/or not for profit activities) through the use of a general set of qualification criteria, for example, to the effect that: alcohol must be sold or supplied as a small part

or proportion of a sales transaction or contract for a wider service, and the amount of alcohol that could be supplied as part of that contract cannot exceed a prescribed amount. Do you think that the qualification criteria proposed meet this aim?

Yes

Score

0

Q32. 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
<b>Allow premises making ancillary sales to request in their premises licence application that the requirement for a personal licence holder be removed</b>	X		
<b>Introduce a new, light-touch form of authorisation for premises making ancillary sales - an ASN but retaining the need for a personal licence holder</b>		X	
<b>Introduce a new, light touch form of authorisation for premises making ancillary sales - an ASN - with no requirement for a personal licence holder</b>	X		

Score

0

Q33. Do you think these proposals would impact adversely on one or more of the licensing objectives? Please select one option.

	Yes	No	Don't know
<b>Allow premises making ancillary sales to request in their premises licence application that the requirement for a personal licence holder be removed</b>	X		
<b>Introduce a new, light-touch form of authorisation for premises making ancillary sales - an ASN but retaining the need for a personal licence holder</b>		X	
<b>Introduce a new, light touch form of authorisation for premises making ancillary sales - an ASN - with no requirement for a personal licence holder</b>	X		

Score

0

Q34. 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 response to a maximum of 200 words:

*No Response*

Page Score

0

## Page 12: Freeing up responsible businesses

Q35. 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

Score

0

Q36. 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
Reduce the burden	X		
Increase the burden		X	

Score

0

Page Score

0

## Page 13: Freeing up responsible businesses

Q37. Should the number of TENs which can be given in respect of individual premises be increased? Please select one option.

No

Score

0

Q38. If you answered yes, please select one option to indicate which you would prefer. Please select one option.

*No Response*

Score

0

Page Score

0

## Page 14: Freeing up responsible businesses

Q39. 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

<b>Determining that premises in certain areas are exempt</b>		X	
<b>Determining that certain premises types are exempt in their local area</b>		X	

Score

0

Q40. 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.

No

Score

0

Q41. 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).

*No Response*

Page Score

0

## Page 15: Freeing up responsible businesses

Q42. Do you agree with each of the following proposals? Please select one option in each row.

	Yes	No	Don't know
<b>Remove requirements to advertise licensing applications in local newspapers</b>	X		
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs for the on and off-trade</b>		X	
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs, but only in respect of overnight accommodation - lodges</b>	X		
<b>Remove or simplify requirements to renew personal licences under the 2003 Act</b>	X		

Score

0

Q43. 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
<b>Remove requirements to advertise licensing</b>	X		

<b>applications in local newspapers</b>			
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs for the on and off-trade</b>	X		
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs, but only in respect of overnight accommodation - lodges</b>	X		
<b>Remove or simplify requirements to renew personal licences under the 2003 Act</b>	X		

Score

0

Q44. 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.

	Yes	No	Don't know
<b>Remove requirements to advertise licensing applications in local newspapers</b>		X	
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs for the on and off-trade</b>	X		
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs, but only in respect of overnight accommodation - lodges</b>		X	
<b>Remove or simplify requirements to renew personal licences under the 2003 Act</b>	X		

Score

0

Q45. 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 keep your views to a maximum of 200 words.)

**No Response**

Page Score

0

## Page 16: Impact assessments

Q46. Impact assessments for the proposals in this consultation have been published alongside the full consultation document. 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
Minimum unit pricing		X	
Multi-buy promotions	X		
Health as a licensing objective for cumulative impact	X		
Ancillary sales of alcohol	X		
Temporary event notices	X		
Late night refreshment	X		
Removing the duty to advertise licence applications in a local newspaper	X		
Sales of alcohol at motorway service stations		X	
Personal licences		X	

Score

0

Q47. Do you have any comments on the methodologies or assumptions used in the impact assessments? If yes, please specify in the box below, clearly referencing the impact assessment and page to which you refer (keeping your views to a maximum of 400 words).

*No Response*

Page Score

0

## Scoring Summary

Pages	Total
1. About you	0
2. A minimum unit price for alcohol	0
3. A minimum unit price for alcohol	0
4. A ban on multi-buy promotions in the off-trade	0
5. A ban on multi-buy promotions in the off-trade	0

6. Reviewing the mandatory licensing conditions	0
7. Reviewing the mandatory licensing conditions	0
8. Health as a licensing objective for cumulative impact policies	0
9. Health as a licensing objective for cumulative impact policies	0
10. Freeing up responsible businesses	0
11. Freeing up responsible businesses	0
12. Freeing up responsible businesses	0
13. Freeing up responsible businesses	0
14. Freeing up responsible businesses	0
15. Freeing up responsible businesses	0
16. Impact assessments	0
<b>Total Survey Score:</b>	0

# Alcohol strategy consultation

User Details - 5452634

**Date Started:** 04/02/2013 09:34:39    **Date Ended:** 04/02/2013 09:51:11

**Time taken:** 16 mins, 32 secs    **IP Address:** n/a

**Unique ID:** n/a

## Page 1: About you

Q1. Please select if you would like your response or personal details to be treated as confidential.

Treat as confidential

Score

0

Q2. Which of the following best describes you or the professional interest you represent? Please select one option from the menu below.

Prefer not to say

Score

0

Q3. If you are responding on behalf of an organisation or interest group, please write in the box below the number of members in your group or organisation.

*No Response*

Q4. How did you obtain the views of your members? Please explain in the box below keeping your response to a maximum of 100 words.

*No Response*

Q5. Please indicate in which region you or your organisation is based. Please select one option from the menu below.

East Midlands

Score

0

Q6. If you are responding as a member of the public, what is your gender? Please select one option.

Male

Score

0

Q7. If you are responding as a member of the public, what is your age? Please select one option.

35-54

Score

0

Page Score

0

## Page 2: A minimum unit price for alcohol

Q8. In the alcohol strategy, the government committed to introducing a minimum unit price for alcohol in England and Wales. This consultation will contribute to the debate on the most appropriate price per unit and the mechanism by which, once set, minimum unit pricing would remain effective. It is also an opportunity for interested parties to raise other issues around minimum unit pricing. The purpose of minimum unit pricing is to reduce alcohol consumption, particularly by the most hazardous and harmful drinkers who tend to show a preference for the cheapest alcohol products. By doing so the government estimates there will be a reduction in the associated crime and health harms, especially the numbers of hospital admissions, alcohol-related deaths and alcohol-related crimes. Minimum unit pricing is not intended disproportionately to affect responsible drinkers or particular social groups but to reduce the availability of alcohol sold at very low or heavily discounted prices. More information (including the definitions of hazardous and harmful drinkers) is available in the full consultation document and the impact assessment. Do you want to answer questions on minimum unit pricing? Please select one option.

Yes

Score

0

Page Score

0

## Page 3: A minimum unit price for alcohol

Q9. The impact of minimum unit pricing will depend on the price per unit of alcohol. The government wants to ensure that the chosen price level is targeted and proportionate, whilst achieving a significant reduction of harm. The government is therefore consulting on the introduction of a recommended minimum unit price of 45p. The government estimates a reduction in consumption across all product types of 3.3 per cent, a reduction in crime of 5,240 per year, a reduction in 24,600 alcohol-related hospital admissions and 714 fewer deaths per year after ten years. Do you agree that this minimum unit price level would achieve these aims? Please select one option.

No

Score

0

Q10. Should other factors or evidence be considered when setting a minimum unit price for alcohol? Please select one option.

Yes

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

Binge drinking and alcoholism are not determined by price.

Score

0

Q11. The government wishes to maintain the effectiveness of minimum unit pricing and is therefore proposing to adjust the minimum unit price level over time. 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

Score

0

Q12. 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

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

All responsible drinkers who are being asked to pay a tax on enjoyment.

Score

0

Page Score

0

## **Page 4: A ban on multi-buy promotions in the off-trade**

Q13. The government is consulting on introducing a ban on multi-buy promotions in the off-trade (e.g. shops and off-licences) as part of its wider strategy to reduce excessive alcohol consumption, and alongside the introduction of a minimum unit price. A ban on multi-buy promotions would therefore not apply to pubs, clubs, bars or restaurants. The term 'multi-buy promotions' refers to alcohol promotions that offer a discount for buying multiple items. 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. As well as being part of a wider strategy to reduce consumption and tackle irresponsible alcohol sales, a ban on multi-buy promotions would also contribute to the government's aim of encouraging people to be aware of how much they drink and the risks of excessive drinking, so that they can make informed choices. The aim of this consultation is to assess support for such a ban and contribute to our understanding of the impact a ban on multi-buy promotions may have. The types of promotion it is proposed that a ban would include, are: two for the price of one, three for the price of two, buy one get one free, buy six and get 20 per cent off, 24 cans of lager costing less than 24 times the cost of a single 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, 3 for £10 where each bottle

costs more than £3.33 More information is available in the full consultation document and the impact assessment. Do you want to answer questions on a ban on multi-buy promotions in the off-trade? Please select one option.

Yes

Score

0

Page Score

0

## Page 5: A ban on multi-buy promotions in the off-trade

Q14. Do you think there should be a ban on multi-buy promotions involving alcohol in the off-trade? Please select one option.

Yes

Score

0

Q15. Are there any further offers which should be included in a ban on multi-buy promotions? Please select one option.

No

Score

0

Q16. Should other factors or evidence be taken into account when considering a ban on multi-buy promotions? Please select one option.

No

Score

0

Q17. 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.

No

Score

0

Page Score

0

## Page 6: Reviewing the mandatory licensing conditions

Q18. 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 alcohol 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. The government has also committed to consult on whether these mandatory licensing conditions should, where relevant, apply to both the on- and off-trade. This consultation forms part of that review, and will contribute

to the government's understanding of how these mandatory conditions are perceived. The five mandatory licensing conditions currently set out in regulations in relation to the supply of alcohol are: a ban on irresponsible promotionsa ban on dispensing alcohol by one person directly into the mouth of anothera requirement to provide free tap water on request to customersa requirement to have an age verification policy to prevent the sale of alcohol to persons under 18 years of age, anda requirement to make available to customers small measures such as half pints or beer or cider or 125ml glasses of wine More information is available in the full consultation document. An explanation of each of these terms can be found on page 20 of the consultation document, in the glossary at the end. Do you want to answer questions on reviewing the mandatory licensing conditions? Please select one option.

No

Score

0

Page Score

0

## Page 7: Reviewing the mandatory licensing conditions

Q19. Do you think each of the mandatory licensing conditions is effective in promoting the licensing objectives? For more information on the licensing objectives please see the glossary at the end of the full consultation document. Please select one option (Yes, No, Don't know) from each drop down menu.

*No Response*

Score

0

Q20. Do you think that the mandatory licensing conditions do enough to target irresponsible promotions in pubs and clubs? Please select one option.

*No Response*

Score

0

Q21. Are there other issues related to the licensing objectives which could be tackled through a mandatory licensing condition? Please select one option.

*No Response*

Score

0

Q22. Do you think that 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.

*No Response*

Score

0

Page Score

0

## Page 8: Health as a licensing objective for cumulative impact policies

Q23. We want to ensure that licensing authorities are able to take alcohol-related health harms into consideration when making decisions about cumulative impact policies (CIPs) which can be used to manage problems linked to the density of premises in specific areas. 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. We are proposing 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. We expect that those areas with the highest levels of alcohol-related health harm, or fast rising levels of harm from alcohol, will be most likely to use this power. It 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. More information is available in the full consultation document and impact assessment. Do you want to answer questions on health as a licensing objective for cumulative impact policies? Please select one option.

No

Score

0

Page Score

0

## Page 9: Health as a licensing objective for cumulative impact policies

Q24. 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):

*No Response*

Q25. 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.

*No Response*

Score

0

Q26. 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 your answer in the box below, providing evidence to support your response (keeping your views to a maximum of 200 words):

**No Response**

Page Score

0

## Page 10: Freeing up responsible businesses

Q27. The government has committed to consult on giving licensing authorities greater freedom to take decisions that reflect the needs of their local community. Following the government's Red Tape Challenge in 2011, three areas of reform were specified: alcohol licensing for certain types of premises providing minimal alcohol sales, temporary event notices (TENs) and the licensing of late night refreshment. This section asks for views on these proposals and suggests further ways to reduce burdens on business. The proposals set out here can be seen alongside work undertaken by the Department for Culture, Media and Sport to remove unnecessary red tape from regulated entertainment. More information on each of these areas for reform is available in the full consultation document. There are five subjects covered in this section. They are: ancillary sales of alcohol occasional provision of licensable activities at community events an extension of the temporary event notice limit at individual premises late night refreshment, and further proposals to reduce burdens on business Do you want to answer questions on freeing up responsible businesses? Please select one option.

Yes

Score

0

Page Score

0

## Page 11: Freeing up responsible businesses

Q28. Ancillary sales of alcohol For many businesses, the sale of alcohol is only a small part of, or incidental to, their wider activities, and occurs alongside the provision of another product or service (which this consultation refers to as an 'ancillary sale'). For example, a guesthouse might wish to provide wine to its guests with an evening meal or a complimentary bottle of wine in a guest's room, while a hairdresser might wish to offer clients a glass of wine. 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

<b>The provision should be limited to a specific list of certain types of business and the kinds of sales they make</b>	X		
<b>The provision should be available to all businesses providing they meet certain qualification criteria to be an ancillary seller</b>	X		
<b>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 the above options</b>	X		

Score

0

Q29. If special provisions 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.

	Yes	No	Don't know
<b>Accommodation providers, providing alcohol alongside accommodation as part of the contract</b>	X		
<b>Hair and beauty salons, providing alcohol alongside a hair or beauty treatment</b>		X	
<b>Florists, providing alcohol alongside the purchase of flowers</b>		X	
<b>Cultural organisations, such as theatres, cinemas and museums, providing alcohol alongside cultural events as part of the entry ticket</b>	X		
<b>Regular charitable events, providing alcohol as part of the wider occasion</b>	X		

Score

0

Q30. 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 suggestions in the box below, keeping your views to a maximum of 200 words:

**No Response**

Q31. 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. Alternatively, a second option is to broaden the definition of 'ancillary sales' to include all businesses (and/or not for profit activities) through the use of a general set of qualification criteria, for example, to the effect that: alcohol must be sold or supplied as a small part or proportion of a sales transaction or contract for a wider service, and the amount of alcohol that could be supplied as part of that contract cannot exceed a prescribed amount. Do you think that the qualification criteria proposed meet this aim?

Yes

Score

0

Q32. 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
<b>Allow premises making ancillary sales to request in their premises licence application that the requirement for a personal licence holder be removed</b>	X		
<b>Introduce a new, light-touch form of authorisation for premises making ancillary sales - an ASN but retaining the need for a personal licence holder</b>	X		
<b>Introduce a new, light touch form of authorisation for premises making ancillary sales - an ASN - with no requirement for a personal licence holder</b>	X		

Score

0

Q33. Do you think these proposals would impact adversely on one or more of the licensing objectives? Please select one option.

	Yes	No	Don't know
<b>Allow premises making ancillary sales to request in their premises licence application that the requirement for a personal licence holder be removed</b>			
<b>Introduce a new, light-touch form of authorisation for premises making ancillary sales - an ASN but retaining the need for a personal licence holder</b>			
<b>Introduce a new, light touch form of authorisation for premises making ancillary sales - an ASN -</b>	X		

**with no requirement for a personal licence holder**

Score

0

Q34. 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 response to a maximum of 200 words:

*No Response*

Page Score

0

## Page 12: Freeing up responsible businesses

Q35. 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

Score

0

Q36. 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
Reduce the burden	X		
Increase the burden		X	

Score

0

Page Score

0

## Page 13: Freeing up responsible businesses

Q37. Should the number of TENs which can be given in respect of individual premises be increased? Please select one option.

Yes

Score

0

Q38. If you answered yes, please select one option to indicate which you would prefer. Please select one option.

18

Score

0

Page Score

0

## Page 14: Freeing up responsible businesses

Q39. 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
<b>Determining that premises in certain areas are exempt</b>	X		
<b>Determining that certain premises types are exempt in their local area</b>	X		

Score

0

Q40. 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

Score

0

Q41. 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).

*No Response*

Page Score

0

## Page 15: Freeing up responsible businesses

Q42. Do you agree with each of the following proposals? Please select one option in each row.

	Yes	No	Don't know
<b>Remove requirements to advertise licensing applications in local newspapers</b>	X		
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs for the on and off-trade</b>	X		
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs, but only in respect of overnight accommodation - lodges</b>	X		
<b>Remove or simplify requirements to renew personal licences under the 2003 Act</b>	X		

Score

0

Q43. 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
<b>Remove requirements to advertise licensing applications in local newspapers</b>	X		
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs for the on and off-trade</b>	X		
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs, but only in respect of overnight accommodation - lodges</b>	X		
<b>Remove or simplify requirements to renew personal licences under the 2003 Act</b>	X		

Score

0

Q44. 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.

	Yes	No	Don't know
<b>Remove requirements to advertise licensing applications in local newspapers</b>		X	
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs for the on and off-trade</b>		X	
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs, but only in respect of overnight accommodation - lodges</b>		X	
<b>Remove or simplify requirements to renew personal licences under the 2003 Act</b>		X	

Score

0

Q45. 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 keep your views to a maximum of 200 words.)

*No Response*

Page Score

0

## Page 16: Impact assessments

Q46. Impact assessments for the proposals in this consultation have been published alongside the full consultation document. 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
Minimum unit pricing		X	
Multi-buy promotions	X		
Health as a licensing objective for cumulative impact		X	
Ancillary sales of alcohol		X	
Temporary event notices		X	
Late night refreshment		X	
Removing the duty to advertise licence applications in a local newspaper		X	
Sales of alcohol at motorway service stations		X	
Personal licences		X	

Score

0

Q47. Do you have any comments on the methodologies or assumptions used in the impact assessments? If yes, please specify in the box below, clearly referencing the impact assessment and page to which you refer (keeping your views to a maximum of 400 words).

*No Response*

Page Score

0

## Scoring Summary

Pages	Total
1. About you	0
2. A minimum unit price for alcohol	0
3. A minimum unit price for alcohol	0
4. A ban on multi-buy promotions in the	0

off-trade	
5. A ban on multi-buy promotions in the off-trade	0
6. Reviewing the mandatory licensing conditions	0
7. Reviewing the mandatory licensing conditions	0
8. Health as a licensing objective for cumulative impact policies	0
9. Health as a licensing objective for cumulative impact policies	0
10. Freeing up responsible businesses	0
11. Freeing up responsible businesses	0
12. Freeing up responsible businesses	0
13. Freeing up responsible businesses	0
14. Freeing up responsible businesses	0
15. Freeing up responsible businesses	0
16. Impact assessments	0
<b>Total Survey Score:</b>	<b>0</b>

# Alcohol strategy consultation

User Details - 5452726

**Date Started:** 04/02/2013 09:46:05    **Date Ended:** 04/02/2013 10:16:08

**Time taken:** 30 mins, 3 secs    **IP Address:** n/a

**Unique ID:** n/a

## Page 1: About you

Q1. Please select if you would like your response or personal details to be treated as confidential.

**No Response**

Score

0

Q2. Which of the following best describes you or the professional interest you represent? Please select one option from the menu below.

Licensing authority

***Please specify which organisation, licensing authority or police force you represent in the box below:***

North Warwickshire Borough Council

Score

0

Q3. If you are responding on behalf of an organisation or interest group, please write in the box below the number of members in your group or organisation.

15

Q4. How did you obtain the views of your members? Please explain in the box below keeping your response to a maximum of 100 words.

Discussed at Committee meeting

Q5. Please indicate in which region you or your organisation is based.

Please select one option from the menu below.

West Midlands

Score

0

Q6. If you are responding as a member of the public, what is your gender? Please select one option.

**No Response**

Score

0

Q7. If you are responding as a member of the public, what is your age? Please select one option.

*No Response*

Score

0

Page Score

0

## Page 2: A minimum unit price for alcohol

Q8. In the alcohol strategy, the government committed to introducing a minimum unit price for alcohol in England and Wales. This consultation will contribute to the debate on the most appropriate price per unit and the mechanism by which, once set, minimum unit pricing would remain effective. It is also an opportunity for interested parties to raise other issues around minimum unit pricing. The purpose of minimum unit pricing is to reduce alcohol consumption, particularly by the most hazardous and harmful drinkers who tend to show a preference for the cheapest alcohol products. By doing so the government estimates there will be a reduction in the associated crime and health harms, especially the numbers of hospital admissions, alcohol-related deaths and alcohol-related crimes. Minimum unit pricing is not intended disproportionately to affect responsible drinkers or particular social groups but to reduce the availability of alcohol sold at very low or heavily discounted prices. More information (including the definitions of hazardous and harmful drinkers) is available in the full consultation document and the impact assessment. Do you want to answer questions on minimum unit pricing? Please select one option.

No

Score

0

Page Score

0

## Page 3: A minimum unit price for alcohol

Q9. The impact of minimum unit pricing will depend on the price per unit of alcohol. The government wants to ensure that the chosen price level is targeted and proportionate, whilst achieving a significant reduction of harm. The government is therefore consulting on the introduction of a recommended minimum unit price of 45p. The government estimates a reduction in consumption across all product types of 3.3 per cent, a reduction in crime of 5,240 per year, a reduction in 24,600 alcohol-related hospital admissions and 714 fewer deaths per year after ten years. Do you agree that this minimum unit price level would achieve these aims? Please select one option.

*No Response*

Score

0

Q10. Should other factors or evidence be considered when setting a minimum unit price for alcohol? Please select one option.

*No Response*

Score

0

Q11. The government wishes to maintain the effectiveness of minimum unit pricing and is therefore proposing to adjust the minimum unit price level over time. How do you think the level of minimum unit price set by the government should be adjusted over time? Please select one option.

*No Response*

Score

0

Q12. 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.

*No Response*

Score

0

Page Score

0

## Page 4: A ban on multi-buy promotions in the off-trade

Q13. The government is consulting on introducing a ban on multi-buy promotions in the off-trade (e.g. shops and off-licences) as part of its wider strategy to reduce excessive alcohol consumption, and alongside the introduction of a minimum unit price. A ban on multi-buy promotions would therefore not apply to pubs, clubs, bars or restaurants. The term 'multi-buy promotions' refers to alcohol promotions that offer a discount for buying multiple items. 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. As well as being part of a wider strategy to reduce consumption and tackle irresponsible alcohol sales, a ban on multi-buy promotions would also contribute to the government's aim of encouraging people to be aware of how much they drink and the risks of excessive drinking, so that they can make informed choices. The aim of this consultation is to assess support for such a ban and contribute to our understanding of the impact a ban on multi-buy promotions may have. The types of promotion it is proposed that a ban would include, are: two for the price of one, three for the price of two, buy one get one free, buy six and get 20 per cent off, 24 cans of lager costing less than 24 times the cost of a single 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, 3 for £10 where each bottle costs more than £3.33. More information is available in the full consultation document and the impact assessment. Do you want to answer questions on a ban on multi-buy promotions in the off-trade? Please select one option.

Yes

Score

0

Page Score

0

## Page 5: A ban on multi-buy promotions in the off-trade

Q14. Do you think there should be a ban on multi-buy promotions involving alcohol in the off-trade? Please select one option.

Yes

Score

0

Q15. Are there any further offers which should be included in a ban on multi-buy promotions? Please select one option.

Don't know

Score

0

Q16. Should other factors or evidence be taken into account when considering a ban on multi-buy promotions? Please select one option.

Don't know

Score

0

Q17. 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.

Don't know

Score

0

Page Score

0

## Page 6: Reviewing the mandatory licensing conditions

Q18. 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 alcohol 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. The government has also committed to consult on whether these mandatory licensing conditions should, where relevant, apply to both the on- and off-trade. This consultation forms part of that review, and will contribute to the government's understanding of how these mandatory conditions are perceived. The five mandatory licensing conditions currently set out in regulations in relation to the supply of alcohol are: a ban on irresponsible

promotions a ban on dispensing alcohol by one person directly into the mouth of another a requirement to provide free tap water on request to customers a requirement to have an age verification policy to prevent the sale of alcohol to persons under 18 years of age, and a requirement to make available to customers small measures such as half pints or beer or cider or 125ml glasses of wine More information is available in the full consultation document. An explanation of each of these terms can be found on page 20 of the consultation document, in the glossary at the end. Do you want to answer questions on reviewing the mandatory licensing conditions? Please select one option.

Yes

Score

0

Page Score

0

## Page 7: Reviewing the mandatory licensing conditions

Q19. Do you think each of the mandatory licensing conditions is effective in promoting the licensing objectives? For more information on the licensing objectives please see the glossary at the end of the full consultation document. Please select one option (Yes, No, Don't know) from each drop down menu.

	Prevention of crime and disorder	Public safety	Prevention of public nuisance	Protection of children from harm
<b>Irresponsible promotions</b>	Yes	Yes	Yes	Yes
<b>Dispensing alcohol directly into the mouth</b>	Yes	Yes	Yes	Yes
<b>Mandatory provision of free tap water</b>	Yes	Yes	Yes	Yes
<b>Age verification policy</b>	Yes	Yes	Yes	Yes
<b>Mandatory provision of small measures</b>	Yes	Yes	Yes	Yes

Score

0

Q20. Do you think that the mandatory licensing conditions do enough to target irresponsible promotions in pubs and clubs? Please select one option.

Yes

Score

0

Q21. Are there other issues related to the licensing objectives which could be tackled through a mandatory licensing condition? Please select one option.

Yes

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

Mandatory requirement for a refusals book. Mandatory requirement for training for all staff in age verification policy.

Score

0

Q22. Do you think that 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

Score

0

Page Score

0

## **Page 8: Health as a licensing objective for cumulative impact policies**

Q23. We want to ensure that licensing authorities are able to take alcohol-related health harms into consideration when making decisions about cumulative impact policies (CIPs) which can be used to manage problems linked to the density of premises in specific areas. 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. We are proposing 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. We expect that those areas with the highest levels of alcohol-related health harm, or fast rising levels of harm from alcohol, will be most likely to use this power. It 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. More information is available in the full consultation document

and impact assessment. Do you want to answer questions on health as a licensing objective for cumulative impact policies? Please select one option.

Yes

Score

0

Page Score

0

## Page 9: Health as a licensing objective for cumulative impact policies

Q24. 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):

Joint Strategic Needs Assessment.

Local health statistics.

Q25. 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.

Don't know

Score

0

Q26. 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 your answer in the box below, providing evidence to support your response (keeping your views to a maximum of 200 words):

**No Response**

Page Score

0

## Page 10: Freeing up responsible businesses

Q27. The government has committed to consult on giving licensing authorities greater freedom to take decisions that reflect the needs of their local community. Following the government's Red Tape Challenge in 2011, three areas of reform were specified: alcohol licensing for certain types of premises providing minimal alcohol sales, temporary event notices (TENs) and the licensing of late night refreshment. This section asks for views on these proposals and suggests further ways to reduce burdens on business. The proposals set out here can be seen alongside work undertaken by the Department for Culture, Media and Sport to remove unnecessary red tape from regulated entertainment. More information on each of these areas for reform is available in the full consultation document. There are five subjects covered in this section. They are: ancillary sales of alcohol occasional provision of licensable activities at community events an extension of the temporary event notice limit at individual premises late night refreshment, and further proposals to reduce burdens on business Do you want to answer

questions on freeing up responsible businesses? Please select one option.

Yes

Score

0

Page Score

0

## Page 11: Freeing up responsible businesses

Q28. Ancillary sales of alcohol For many businesses, the sale of alcohol is only a small part of, or incidental to, their wider activities, and occurs alongside the provision of another product or service (which this consultation refers to as an 'ancillary sale'). For example, a guesthouse might wish to provide wine to its guests with an evening meal or a complimentary bottle of wine in a guest's room, while a hairdresser might wish to offer clients a glass of wine. 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
<b>The provision should be limited to a specific list of certain types of business and the kinds of sales they make</b>		X	
<b>The provision should be available to all businesses providing they meet certain qualification criteria to be an ancillary seller</b>		X	
<b>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 the above options</b>		X	

Score

0

Q29. If special provisions 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.

	Yes	No	Don't know
<b>Accommodation providers, providing alcohol alongside accommodation as part of the contract</b>		X	
<b>Hair and beauty salons, providing alcohol</b>		X	

alongside a hair or beauty treatment			
Florists, providing alcohol alongside the purchase of flowers		X	
Cultural organisations, such as theatres, cinemas and museums, providing alcohol alongside cultural events as part of the entry ticket		X	
Regular charitable events, providing alcohol as part of the wider occasion		X	

Score

0

Q30. 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 suggestions in the box below, keeping your views to a maximum of 200 words:

*No Response*

Q31. 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. Alternatively, a second option is to broaden the definition of 'ancillary sales' to include all businesses (and/or not for profit activities) through the use of a general set of qualification criteria, for example, to the effect that: alcohol must be sold or supplied as a small part or proportion of a sales transaction or contract for a wider service, and the amount of alcohol that could be supplied as part of that contract cannot exceed a prescribed amount. Do you think that the qualification criteria proposed meet this aim?

No

***Please use the space below to provide further comments (keeping your views to a maximum of 200 words):***

The proposals will create huge problems due to uncertainty about what is 'ancillary'. They will open up loopholes that can be exploited by unscrupulous businesses and the only people to benefit will be the legal profession as usual.

Score

0

Q32. 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
Allow premises making ancillary sales to request		X	

<b>in their premises licence application that the requirement for a personal licence holder be removed</b>			
<b>Introduce a new, light-touch form of authorisation for premises making ancillary sales - an ASN but retaining the need for a personal licence holder</b>		X	
<b>Introduce a new, light touch form of authorisation for premises making ancillary sales - an ASN - with no requirement for a personal licence holder</b>		X	

Score

0

Q33. Do you think these proposals would impact adversely on one or more of the licensing objectives? Please select one option.

	Yes	No	Don't know
<b>Allow premises making ancillary sales to request in their premises licence application that the requirement for a personal licence holder be removed</b>	X		
<b>Introduce a new, light-touch form of authorisation for premises making ancillary sales - an ASN but retaining the need for a personal licence holder</b>	X		
<b>Introduce a new, light touch form of authorisation for premises making ancillary sales - an ASN - with no requirement for a personal licence holder</b>	X		

Score

0

Q34. 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 response to a maximum of 200 words:

The current system is already 'light touch'. Once someone has a premises and personal licence they do not have to do anything else unless they wish to significantly change their operation. The current requirements are very effective in ensuring businesses meet the licensing objectives and any relaxation risks undermining the system.

Page Score

0

## Page 12: Freeing up responsible businesses

Q35. 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.

No

Score

0

Q36. 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
<b>Reduce the burden</b>			X
<b>Increase the burden</b>			X

Score

0

Page Score

0

## Page 13: Freeing up responsible businesses

Q37. Should the number of TENs which can be given in respect of individual premises be increased? Please select one option.

No

Score

0

Q38. If you answered yes, please select one option to indicate which you would prefer. Please select one option.

**No Response**

Score

0

Page Score

0

## Page 14: Freeing up responsible businesses

Q39. 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
<b>Determining that premises in certain areas are exempt</b>	X		
<b>Determining that certain premises types are exempt in their local area</b>	X		

Score

0

Q40. 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.

No

Score

0

Q41. 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).

*No Response*

Page Score

0

## Page 15: Freeing up responsible businesses

Q42. Do you agree with each of the following proposals? Please select one option in each row.

	Yes	No	Don't know
<b>Remove requirements to advertise licensing applications in local newspapers</b>		X	
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs for the on and off-trade</b>		X	
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs, but only in respect of overnight accommodation - lodges</b>		X	
<b>Remove or simplify requirements to renew personal licences under the 2003 Act</b>		X	

Score

0

Q43. 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
<b>Remove requirements to advertise licensing applications in local newspapers</b>		X	
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs for the on and off-trade</b>		X	
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs, but only in respect of overnight accommodation - lodges</b>		X	
<b>Remove or simplify requirements to renew</b>		X	

<b>personal licences under the 2003 Act</b>			
---	--	--	--

Score

0

Q44. 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.

	Yes	No	Don't know
<b>Remove requirements to advertise licensing applications in local newspapers</b>	X		
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs for the on and off-trade</b>	X		
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs, but only in respect of overnight accommodation - lodges</b>	X		
<b>Remove or simplify requirements to renew personal licences under the 2003 Act</b>	X		

Score

0

Q45. 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 keep your views to a maximum of 200 words.)

*No Response*

Page Score

0

## Page 16: Impact assessments

Q46. Impact assessments for the proposals in this consultation have been published alongside the full consultation document. 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
<b>Minimum unit pricing</b>			X
<b>Multi-buy promotions</b>			X
<b>Health as a licensing objective for cumulative</b>			X

<b>impact</b>			
<b>Ancillary sales of alcohol</b>			X
<b>Temporary event notices</b>			X
<b>Late night refreshment</b>			X
<b>Removing the duty to advertise licence applications in a local newspaper</b>			X
<b>Sales of alcohol at motorway service stations</b>			X
<b>Personal licences</b>			X

Score

0

Q47. Do you have any comments on the methodologies or assumptions used in the impact assessments? If yes, please specify in the box below, clearly referencing the impact assessment and page to which you refer (keeping your views to a maximum of 400 words).

**No Response**

Page Score

0

## Scoring Summary

<b>Pages</b>	<b>Total</b>
1. About you	0
2. A minimum unit price for alcohol	0
3. A minimum unit price for alcohol	0
4. A ban on multi-buy promotions in the off-trade	0
5. A ban on multi-buy promotions in the off-trade	0
6. Reviewing the mandatory licensing conditions	0
7. Reviewing the mandatory licensing conditions	0
8. Health as a licensing objective for cumulative impact policies	0

9. Health as a licensing objective for cumulative impact policies	0
10. Freeing up responsible businesses	0
11. Freeing up responsible businesses	0
12. Freeing up responsible businesses	0
13. Freeing up responsible businesses	0
14. Freeing up responsible businesses	0
15. Freeing up responsible businesses	0
16. Impact assessments	0
<b>Total Survey Score:</b>	<b>0</b>

# Alcohol strategy consultation

---

User Details - 5453008

**Date Started:** 04/02/2013 10:14:48    **Date Ended:** 04/02/2013 10:21:24

**Time taken:** 6 mins, 36 secs    **IP Address:** n/a

**Unique ID:** n/a

---

## Page 1: About you

Q1. Please select if you would like your response or personal details to be treated as confidential.

*No Response*

Score

0

Q2. Which of the following best describes you or the professional interest you represent? Please select one option from the menu below.

*No Response*

Score

0

Q3. If you are responding on behalf of an organisation or interest group, please write in the box below the number of members in your group or organisation.

*No Response*

Q4. How did you obtain the views of your members? Please explain in the box below keeping your response to a maximum of 100 words.

*No Response*

Q5. Please indicate in which region you or your organisation is based. Please select one option from the menu below.

*No Response*

Score

0

Q6. If you are responding as a member of the public, what is your gender? Please select one option.

*No Response*

Score

0

Q7. If you are responding as a member of the public, what is your age? Please select one option.

*No Response*

Score

0

Page Score

0

## Page 2: A minimum unit price for alcohol

Q8. In the alcohol strategy, the government committed to introducing a minimum unit price for alcohol in England and Wales. This consultation will contribute to the debate on the most appropriate price per unit and the mechanism by which, once set, minimum unit pricing would remain effective. It is also an opportunity for interested parties to raise other issues around minimum unit pricing. The purpose of minimum unit pricing is to reduce alcohol consumption, particularly by the most hazardous and harmful drinkers who tend to show a preference for the cheapest alcohol products. By doing so the government estimates there will be a reduction in the associated crime and health harms, especially the numbers of hospital admissions, alcohol-related deaths and alcohol-related crimes. Minimum unit pricing is not intended disproportionately to affect responsible drinkers or particular social groups but to reduce the availability of alcohol sold at very low or heavily discounted prices. More information (including the definitions of hazardous and harmful drinkers) is available in the full consultation document and the impact assessment. Do you want to answer questions on minimum unit pricing? Please select one option.

Yes

Score

0

Page Score

0

## Page 3: A minimum unit price for alcohol

Q9. The impact of minimum unit pricing will depend on the price per unit of alcohol. The government wants to ensure that the chosen price level is targeted and proportionate, whilst achieving a significant reduction of harm. The government is therefore consulting on the introduction of a recommended minimum unit price of 45p. The government estimates a reduction in consumption across all product types of 3.3 per cent, a reduction in crime of 5,240 per year, a reduction in 24,600 alcohol-related hospital admissions and 714 fewer deaths per year after ten years. Do you agree that this minimum unit price level would achieve these aims? Please select one option.

*No Response*

Score

0

Q10. Should other factors or evidence be considered when setting a minimum unit price for alcohol? Please select one option.

*No Response*

Score

0

Q11. The government wishes to maintain the effectiveness of minimum unit

pricing and is therefore proposing to adjust the minimum unit price level over time. How do you think the level of minimum unit price set by the government should be adjusted over time? Please select one option.

*No Response*

Score

0

Q12. 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.

*No Response*

Score

0

Page Score

0

## **Page 4: A ban on multi-buy promotions in the off-trade**

Q13. The government is consulting on introducing a ban on multi-buy promotions in the off-trade (e.g. shops and off-licences) as part of its wider strategy to reduce excessive alcohol consumption, and alongside the introduction of a minimum unit price. A ban on multi-buy promotions would therefore not apply to pubs, clubs, bars or restaurants. The term 'multi-buy promotions' refers to alcohol promotions that offer a discount for buying multiple items. 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. As well as being part of a wider strategy to reduce consumption and tackle irresponsible alcohol sales, a ban on multi-buy promotions would also contribute to the government's aim of encouraging people to be aware of how much they drink and the risks of excessive drinking, so that they can make informed choices. The aim of this consultation is to assess support for such a ban and contribute to our understanding of the impact a ban on multi-buy promotions may have. The types of promotion it is proposed that a ban would include, are: two for the price of one, three for the price of two, buy one get one free, buy six and get 20 per cent off, 24 cans of lager costing less than 24 times the cost of a single 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, 3 for £10 where each bottle costs more than £3.33. More information is available in the full consultation document and the impact assessment. Do you want to answer questions on a ban on multi-buy promotions in the off-trade? Please select one option.

Yes

Score

0

Page Score

0

## Page 5: A ban on multi-buy promotions in the off-trade

Q14. Do you think there should be a ban on multi-buy promotions involving alcohol in the off-trade? Please select one option.

*No Response*

Score

0

Q15. Are there any further offers which should be included in a ban on multi-buy promotions? Please select one option.

*No Response*

Score

0

Q16. Should other factors or evidence be taken into account when considering a ban on multi-buy promotions? Please select one option.

*No Response*

Score

0

Q17. 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.

*No Response*

Score

0

Page Score

0

## Page 6: Reviewing the mandatory licensing conditions

Q18. 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 alcohol 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. The government has also committed to consult on whether these mandatory licensing conditions should, where relevant, apply to both the on- and off-trade. This consultation forms part of that review, and will contribute to the government's understanding of how these mandatory conditions are perceived. The five mandatory licensing conditions currently set out in regulations in relation to the supply of alcohol are: a ban on irresponsible promotionsa ban on dispensing alcohol by one person directly into the mouth of anothera requirement to provide free tap water on request to

customers a requirement to have an age verification policy to prevent the sale of alcohol to persons under 18 years of age, and a requirement to make available to customers small measures such as half pints or beer or cider or 125ml glasses of wine. More information is available in the full consultation document. An explanation of each of these terms can be found on page 20 of the consultation document, in the glossary at the end. Do you want to answer questions on reviewing the mandatory licensing conditions? Please select one option.

Yes

Score

0

Page Score

0

## Page 7: Reviewing the mandatory licensing conditions

Q19. Do you think each of the mandatory licensing conditions is effective in promoting the licensing objectives? For more information on the licensing objectives please see the glossary at the end of the full consultation document. Please select one option (Yes, No, Don't know) from each drop down menu.

*No Response*

Score

0

Q20. Do you think that the mandatory licensing conditions do enough to target irresponsible promotions in pubs and clubs? Please select one option.

*No Response*

Score

0

Q21. Are there other issues related to the licensing objectives which could be tackled through a mandatory licensing condition? Please select one option.

*No Response*

Score

0

Q22. Do you think that 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.

*No Response*

Score

0

Page Score

0

## Page 8: Health as a licensing objective for cumulative impact policies

Q23. We want to ensure that licensing authorities are able to take alcohol-related health harms into consideration when making decisions about cumulative impact policies (CIPs) which can be used to manage problems linked to the density of premises in specific areas. 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. We are proposing 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. We expect that those areas with the highest levels of alcohol-related health harm, or fast rising levels of harm from alcohol, will be most likely to use this power. It 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. More information is available in the full consultation document and impact assessment. Do you want to answer questions on health as a licensing objective for cumulative impact policies? Please select one option.

Yes

Score

0

Page Score

0

## Page 9: Health as a licensing objective for cumulative impact policies

Q24. 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):

*No Response*

Q25. 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.

*No Response*

Score

0

Q26. 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 your answer in the box below, providing evidence to support your response (keeping your views to a maximum of 200 words):

*No Response*

Page Score

0

## Page 10: Freeing up responsible businesses

Q27. The government has committed to consult on giving licensing authorities greater freedom to take decisions that reflect the needs of their local community. Following the government's Red Tape Challenge in 2011, three areas of reform were specified: alcohol licensing for certain types of premises providing minimal alcohol sales, temporary event notices (TENs) and the licensing of late night refreshment. This section asks for views on these proposals and suggests further ways to reduce burdens on business. The proposals set out here can be seen alongside work undertaken by the Department for Culture, Media and Sport to remove unnecessary red tape from regulated entertainment. More information on each of these areas for reform is available in the full consultation document. There are five subjects covered in this section. They are: ancillary sales of alcohol occasional provision of licensable activities at community events an extension of the temporary event notice limit at individual premises late night refreshment, and further proposals to reduce burdens on business Do you want to answer questions on freeing up responsible businesses? Please select one option.

Yes

Score

0

Page Score

0

## Page 11: Freeing up responsible businesses

Q28. Ancillary sales of alcohol For many businesses, the sale of alcohol is only a small part of, or incidental to, their wider activities, and occurs alongside the provision of another product or service (which this consultation refers to as an 'ancillary sale'). For example, a guesthouse might wish to provide wine to its guests with an evening meal or a complimentary bottle of wine in a guest's room, while a hairdresser might wish to offer clients a glass of wine. 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.

*No Response*

Score

0

Q29. If special provisions 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.

*No Response*

Score

0

Q30. 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 suggestions in the box below, keeping your views to a maximum of 200 words:

*No Response*

Q31. 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. Alternatively, a second option is to broaden the definition of 'ancillary sales' to include all businesses (and/or not for profit activities) through the use of a general set of qualification criteria, for example, to the effect that: alcohol must be sold or supplied as a small part or proportion of a sales transaction or contract for a wider service, and the amount of alcohol that could be supplied as part of that contract cannot exceed a prescribed amount. Do you think that the qualification criteria proposed meet this aim?

*No Response*

Score

0

Q32. Do you think that these proposals would significantly reduce the burdens on ancillary sellers? Please select one option in each row.

*No Response*

Score

0

Q33. Do you think these proposals would impact adversely on one or more of the licensing objectives? Please select one option.

*No Response*

Score

0

Q34. 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 response to a maximum of 200 words:

*No Response*

Page Score

0

## **Page 12: Freeing up responsible businesses**

Q35. 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.

*No Response*

Score

0

Q36. What impact do you think a locally determined notification would have on organisers of community events? Please select one option in each row.

*No Response*

Score

0

Page Score

0

## **Page 13: Freeing up responsible businesses**

Q37. Should the number of TENs which can be given in respect of individual premises be increased? Please select one option.

*No Response*

Score

0

Q38. If you answered yes, please select one option to indicate which you would prefer. Please select one option.

*No Response*

Score

0

Page Score

0

## **Page 14: Freeing up responsible businesses**

Q39. 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.

*No Response*

Score

0

Q40. 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.

*No Response*

Score

0

Q41. 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).

*No Response*

Page Score

0

## **Page 15: Freeing up responsible businesses**

Q42. Do you agree with each of the following proposals? Please select one option in each row.

*No Response*

Score

0

Q43. Do you think that each of the following would reduce the overall burdens on business? Please select one option in each row.

*No Response*

Score

0

Q44. 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.

*No Response*

Score

0

Q45. 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 keep your views to a maximum of 200 words.)

*No Response*

Page Score

0

## Page 16: Impact assessments

Q46. Impact assessments for the proposals in this consultation have been published alongside the full consultation document. 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.

*No Response*

Score

0

Q47. Do you have any comments on the methodologies or assumptions used in the impact assessments? If yes, please specify in the box below, clearly referencing the impact assessment and page to which you refer (keeping your views to a maximum of 400 words).

*No Response*

Page Score

0

## Scoring Summary

Pages	Total
1. About you	0
2. A minimum unit price for alcohol	0
3. A minimum unit price for alcohol	0
4. A ban on multi-buy promotions in the off-trade	0

5. A ban on multi-buy promotions in the off-trade	0
6. Reviewing the mandatory licensing conditions	0
7. Reviewing the mandatory licensing conditions	0
8. Health as a licensing objective for cumulative impact policies	0
9. Health as a licensing objective for cumulative impact policies	0
10. Freeing up responsible businesses	0
11. Freeing up responsible businesses	0
12. Freeing up responsible businesses	0
13. Freeing up responsible businesses	0
14. Freeing up responsible businesses	0
15. Freeing up responsible businesses	0
16. Impact assessments	0
<b>Total Survey Score:</b>	<b>0</b>

# Alcohol strategy consultation

User Details - 5450605

**Date Started:** 03/02/2013 21:29:35      **Date Ended:** 04/02/2013 10:24:20

**Time taken:** 12 hrs, 54 mins, 45 secs      **IP Address:** n/a

**Unique ID:** n/a

## Page 1: About you

Q1. Please select if you would like your response or personal details to be treated as confidential.

**No Response**

Score

0

Q2. Which of the following best describes you or the professional interest you represent? Please select one option from the menu below.

Licensing authority

***Please specify which organisation, licensing authority or police force you represent in the box below:***

Gosport Borough Council

Score

0

Q3. If you are responding on behalf of an organisation or interest group, please write in the box below the number of members in your group or organisation.

Gosport Borough Council

Q4. How did you obtain the views of your members? Please explain in the box below keeping your response to a maximum of 100 words.

**No Response**

Q5. Please indicate in which region you or your organisation is based.

Please select one option from the menu below.

South East England

Score

0

Q6. If you are responding as a member of the public, what is your gender?

Please select one option.

**No Response**

Score

0

Q7. If you are responding as a member of the public, what is your age?

Please select one option.

*No Response*

Score

0

Page Score

0

## Page 2: A minimum unit price for alcohol

Q8. In the alcohol strategy, the government committed to introducing a minimum unit price for alcohol in England and Wales. This consultation will contribute to the debate on the most appropriate price per unit and the mechanism by which, once set, minimum unit pricing would remain effective. It is also an opportunity for interested parties to raise other issues around minimum unit pricing. The purpose of minimum unit pricing is to reduce alcohol consumption, particularly by the most hazardous and harmful drinkers who tend to show a preference for the cheapest alcohol products. By doing so the government estimates there will be a reduction in the associated crime and health harms, especially the numbers of hospital admissions, alcohol-related deaths and alcohol-related crimes. Minimum unit pricing is not intended disproportionately to affect responsible drinkers or particular social groups but to reduce the availability of alcohol sold at very low or heavily discounted prices. More information (including the definitions of hazardous and harmful drinkers) is available in the full consultation document and the impact assessment. Do you want to answer questions on minimum unit pricing? Please select one option.

Yes

Score

0

Page Score

0

## Page 3: A minimum unit price for alcohol

Q9. The impact of minimum unit pricing will depend on the price per unit of alcohol. The government wants to ensure that the chosen price level is targeted and proportionate, whilst achieving a significant reduction of harm. The government is therefore consulting on the introduction of a recommended minimum unit price of 45p. The government estimates a reduction in consumption across all product types of 3.3 per cent, a reduction in crime of 5,240 per year, a reduction in 24,600 alcohol-related hospital admissions and 714 fewer deaths per year after ten years. Do you agree that this minimum unit price level would achieve these aims? Please select one option.

Yes

Score

0

Q10. Should other factors or evidence be considered when setting a minimum unit price for alcohol? Please select one option.

No

Score

0

Q11. The government wishes to maintain the effectiveness of minimum unit pricing and is therefore proposing to adjust the minimum unit price level over time. 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 automatically be updated in line with inflation each year

Score

0

Q12. 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.

Don't know

Score

0

Page Score

0

## Page 4: A ban on multi-buy promotions in the off-trade

Q13. The government is consulting on introducing a ban on multi-buy promotions in the off-trade (e.g. shops and off-licences) as part of its wider strategy to reduce excessive alcohol consumption, and alongside the introduction of a minimum unit price. A ban on multi-buy promotions would therefore not apply to pubs, clubs, bars or restaurants. The term 'multi-buy promotions' refers to alcohol promotions that offer a discount for buying multiple items. 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. As well as being part of a wider strategy to reduce consumption and tackle irresponsible alcohol sales, a ban on multi-buy promotions would also contribute to the government's aim of encouraging people to be aware of how much they drink and the risks of excessive drinking, so that they can make informed choices. The aim of this consultation is to assess support for such a ban and contribute to our understanding of the impact a ban on multi-buy promotions may have. The types of promotion it is proposed that a ban would include, are: two for the price of one, three for the price of two, buy one get one free, buy six and get 20 per cent off, 24 cans of lager costing less than 24 times the cost of a single 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, 3 for £10 where each bottle costs more than £3.33. More information is available in the full consultation document and the impact assessment. Do you want to answer questions

on a ban on multi-buy promotions in the off-trade? Please select one option.

Yes

Score

0

Page Score

0

## Page 5: A ban on multi-buy promotions in the off-trade

Q14. Do you think there should be a ban on multi-buy promotions involving alcohol in the off-trade? Please select one option.

Yes

Score

0

Q15. Are there any further offers which should be included in a ban on multi-buy promotions? Please select one option.

No

Score

0

Q16. Should other factors or evidence be taken into account when considering a ban on multi-buy promotions? Please select one option.

Don't know

Score

0

Q17. 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.

Don't know

Score

0

Page Score

0

## Page 6: Reviewing the mandatory licensing conditions

Q18. 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 alcohol 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. The government has also committed to consult on whether these mandatory licensing conditions should, where relevant, apply to both the on- and off-trade. This consultation forms part of that review, and will contribute to the government's understanding of how these mandatory conditions are perceived. The five mandatory licensing conditions currently set out in

regulations in relation to the supply of alcohol are: a ban on irresponsible promotions a ban on dispensing alcohol by one person directly into the mouth of another a requirement to provide free tap water on request to customers a requirement to have an age verification policy to prevent the sale of alcohol to persons under 18 years of age, and a requirement to make available to customers small measures such as half pints or beer or cider or 125ml glasses of wine More information is available in the full consultation document. An explanation of each of these terms can be found on page 20 of the consultation document, in the glossary at the end. Do you want to answer questions on reviewing the mandatory licensing conditions? Please select one option.

Yes

Score

0

Page Score

0

## Page 7: Reviewing the mandatory licensing conditions

Q19. Do you think each of the mandatory licensing conditions is effective in promoting the licensing objectives? For more information on the licensing objectives please see the glossary at the end of the full consultation document. Please select one option (Yes, No, Don't know) from each drop down menu.

	Prevention of crime and disorder	Public safety	Prevention of public nuisance	Protection of children from harm
<b>Irresponsible promotions</b>	Yes	Yes	Yes	Don't know
<b>Dispensing alcohol directly into the mouth</b>	Yes	Yes	Yes	No
<b>Mandatory provision of free tap water</b>	Yes	Yes	Yes	No
<b>Age verification policy</b>	Yes	Yes	Yes	Yes
<b>Mandatory provision of small measures</b>	Yes	Yes	Yes	No

Score

0

Q20. Do you think that the mandatory licensing conditions do enough to target irresponsible promotions in pubs and clubs? Please select one option.

Yes

Score

0

Q21. Are there other issues related to the licensing objectives which could be tackled through a mandatory licensing condition? Please select one option.

Don't know

Score

0

Q22. Do you think that 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

Score

0

Page Score

0

## Page 8: Health as a licensing objective for cumulative impact policies

Q23. We want to ensure that licensing authorities are able to take alcohol-related health harms into consideration when making decisions about cumulative impact policies (CIPs) which can be used to manage problems linked to the density of premises in specific areas. 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. We are proposing 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. We expect that those areas with the highest levels of alcohol-related health harm, or fast rising levels of harm from alcohol, will be most likely to use this power. It 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. More information is available in the full consultation document and impact assessment. Do you want to answer questions on health as a licensing objective for cumulative impact policies? Please select one option.

Yes

Score

0

Page Score

0

## Page 9: Health as a licensing objective for cumulative impact policies

Q24. 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):

- 1) A & E patient data captured at time of admission.
- 2) Ambulance Service dispatch data of locations where a patient is collected from.

Q25. 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.

No

Score

0

Q26. 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 your answer in the box below, providing evidence to support your response (keeping your views to a maximum of 200 words):

To give additional validation to the limited data currently available.

Page Score

0

## Page 10: Freeing up responsible businesses

Q27. The government has committed to consult on giving licensing authorities greater freedom to take decisions that reflect the needs of their local community. Following the government's Red Tape Challenge in 2011, three areas of reform were specified: alcohol licensing for certain types of premises providing minimal alcohol sales, temporary event notices (TENs) and the licensing of late night refreshment. This section asks for views on these proposals and suggests further ways to reduce burdens on business. The proposals set out here can be seen alongside work undertaken by the Department for Culture, Media and Sport to remove unnecessary red tape from regulated entertainment. More information on each of these areas for reform is available in the full consultation document. There are five subjects covered in this section. They are: ancillary sales of alcohol, occasional provision of licensable activities at community events, an extension of the temporary event notice limit at individual premises, late night refreshment, and further proposals to reduce burdens on business. Do you want to answer questions on freeing up responsible businesses? Please select one option.

Yes

Score

0

Page Score

0

## Page 11: Freeing up responsible businesses

Q28. Ancillary sales of alcohol For many businesses, the sale of alcohol is only a small part of, or incidental to, their wider activities, and occurs alongside the provision of another product or service (which this consultation refers to as an 'ancillary sale'). For example, a guesthouse might wish to provide wine to its guests with an evening meal or a complimentary bottle of wine in a guest's room, while a hairdresser might wish to offer clients a glass of wine. 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
<b>The provision should be limited to a specific list of certain types of business and the kinds of sales they make</b>	X		
<b>The provision should be available to all businesses providing they meet certain qualification criteria to be an ancillary seller</b>		X	
<b>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 the above options</b>	X		

Score

0

Q29. If special provisions 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.

	Yes	No	Don't know
<b>Accommodation providers, providing alcohol alongside accommodation as part of the contract</b>	X		
<b>Hair and beauty salons, providing alcohol alongside a hair or beauty treatment</b>	X		

<b>Florists, providing alcohol alongside the purchase of flowers</b>	X		
<b>Cultural organisations, such as theatres, cinemas and museums, providing alcohol alongside cultural events as part of the entry ticket</b>	X		
<b>Regular charitable events, providing alcohol as part of the wider occasion</b>			X

Score

0

Q30. 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 suggestions in the box below, keeping your views to a maximum of 200 words:

**No Response**

Q31. 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. Alternatively, a second option is to broaden the definition of 'ancillary sales' to include all businesses (and/or not for profit activities) through the use of a general set of qualification criteria, for example, to the effect that: alcohol must be sold or supplied as a small part or proportion of a sales transaction or contract for a wider service, and the amount of alcohol that could be supplied as part of that contract cannot exceed a prescribed amount. Do you think that the qualification criteria proposed meet this aim?

Yes

Score

0

Q32. 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
<b>Allow premises making ancillary sales to request in their premises licence application that the requirement for a personal licence holder be removed</b>		X	
<b>Introduce a new, light-touch form of authorisation for premises making ancillary sales - an ASN but retaining the need for a personal licence holder</b>	X		

<b>Introduce a new, light touch form of authorisation for premises making ancillary sales - an ASN - with no requirement for a personal licence holder</b>		X	
--	--	---	--

Score

0

Q33. Do you think these proposals would impact adversely on one or more of the licensing objectives? Please select one option.

	Yes	No	Don't know
<b>Allow premises making ancillary sales to request in their premises licence application that the requirement for a personal licence holder be removed</b>	X		
<b>Introduce a new, light-touch form of authorisation for premises making ancillary sales - an ASN but retaining the need for a personal licence holder</b>		X	
<b>Introduce a new, light touch form of authorisation for premises making ancillary sales - an ASN - with no requirement for a personal licence holder</b>	X		

Score

0

Q34. 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 response to a maximum of 200 words:

*No Response*

Page Score

0

## Page 12: Freeing up responsible businesses

Q35. 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.

No

Score

0

Q36. 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
<b>Reduce the burden</b>		X	

<b>Increase the burden</b>			X
----------------------------	--	--	---

Score

0

Page Score

0

## Page 13: Freeing up responsible businesses

Q37. Should the number of TENs which can be given in respect of individual premises be increased? Please select one option.

Yes

Score

0

Q38. If you answered yes, please select one option to indicate which you would prefer. Please select one option.

15

Score

0

Page Score

0

## Page 14: Freeing up responsible businesses

Q39. 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
<b>Determining that premises in certain areas are exempt</b>		X	
<b>Determining that certain premises types are exempt in their local area</b>		X	

Score

0

Q40. 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

Score

0

Q41. 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).

**No Response**

Page Score

0

## Page 15: Freeing up responsible businesses

Q42. Do you agree with each of the following proposals? Please select one option in each row.

	Yes	No	Don't know
<b>Remove requirements to advertise licensing applications in local newspapers</b>	X		
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs for the on and off-trade</b>		X	
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs, but only in respect of overnight accommodation - lodges</b>			X
<b>Remove or simplify requirements to renew personal licences under the 2003 Act</b>		X	

Score

0

Q43. 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
<b>Remove requirements to advertise licensing applications in local newspapers</b>	X		
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs for the on and off-trade</b>		X	
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs, but only in respect of overnight accommodation - lodges</b>		X	
<b>Remove or simplify requirements to renew personal licences under the 2003 Act</b>		X	

Score

0

Q44. 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.

	Yes	No	Don't know

<b>Remove requirements to advertise licensing applications in local newspapers</b>		X	
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs for the on and off-trade</b>	X		
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs, but only in respect of overnight accommodation - lodges</b>	X		
<b>Remove or simplify requirements to renew personal licences under the 2003 Act</b>			X

Score

0

Q45. 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 keep your views to a maximum of 200 words.)

*No Response*

Page Score

0

## Page 16: Impact assessments

Q46. Impact assessments for the proposals in this consultation have been published alongside the full consultation document. 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
<b>Minimum unit pricing</b>	X		
<b>Multi-buy promotions</b>	X		
<b>Health as a licensing objective for cumulative impact</b>	X		
<b>Ancillary sales of alcohol</b>	X		
<b>Temporary event notices</b>	X		
<b>Late night refreshment</b>	X		
<b>Removing the duty to advertise licence applications in a local newspaper</b>	X		

<b>Sales of alcohol at motorway service stations</b>			X
<b>Personal licences</b>	X		

Score

0

Q47. Do you have any comments on the methodologies or assumptions used in the impact assessments? If yes, please specify in the box below, clearly referencing the impact assessment and page to which you refer (keeping your views to a maximum of 400 words).

*No Response*

Page Score

0

## Scoring Summary

Pages	Total
1. About you	0
2. A minimum unit price for alcohol	0
3. A minimum unit price for alcohol	0
4. A ban on multi-buy promotions in the off-trade	0
5. A ban on multi-buy promotions in the off-trade	0
6. Reviewing the mandatory licensing conditions	0
7. Reviewing the mandatory licensing conditions	0
8. Health as a licensing objective for cumulative impact policies	0
9. Health as a licensing objective for cumulative impact policies	0
10. Freeing up responsible businesses	0
11. Freeing up responsible businesses	0
12. Freeing up responsible businesses	0
13. Freeing up responsible businesses	0

14. Freeing up responsible businesses	0
15. Freeing up responsible businesses	0
16. Impact assessments	0
<b>Total Survey Score:</b>	0

# Alcohol strategy consultation

User Details - 5362206

**Date Started:** 17/01/2013 10:24:31    **Date Ended:** 04/02/2013 10:26:22

**Time taken:** 432 hrs, 1 min, 51 secs    **IP Address:** n/a

**Unique ID:** n/a

## Page 1: About you

Q1. Please select if you would like your response or personal details to be treated as confidential.

*No Response*

Score

0

Q2. Which of the following best describes you or the professional interest you represent? Please select one option from the menu below.

Public health body (eg Primary Care Trust, Local Health Board, Director of Public Health)

***Please specify which organisation, licensing authority or police force you represent in the box below:***

South Tyneside Clinical Commissioning Group

Score

0

Q3. If you are responding on behalf of an organisation or interest group, please write in the box below the number of members in your group or organisation.

*No Response*

Q4. How did you obtain the views of your members? Please explain in the box below keeping your response to a maximum of 100 words.

*No Response*

Q5. Please indicate in which region you or your organisation is based.

Please select one option from the menu below.

North East England

Score

0

Q6. If you are responding as a member of the public, what is your gender? Please select one option.

*No Response*

Score

0

Q7. If you are responding as a member of the public, what is your age?

Please select one option.

**No Response**

Score

0

Page Score

0

## Page 2: A minimum unit price for alcohol

Q8. In the alcohol strategy, the government committed to introducing a minimum unit price for alcohol in England and Wales. This consultation will contribute to the debate on the most appropriate price per unit and the mechanism by which, once set, minimum unit pricing would remain effective. It is also an opportunity for interested parties to raise other issues around minimum unit pricing. The purpose of minimum unit pricing is to reduce alcohol consumption, particularly by the most hazardous and harmful drinkers who tend to show a preference for the cheapest alcohol products. By doing so the government estimates there will be a reduction in the associated crime and health harms, especially the numbers of hospital admissions, alcohol-related deaths and alcohol-related crimes. Minimum unit pricing is not intended disproportionately to affect responsible drinkers or particular social groups but to reduce the availability of alcohol sold at very low or heavily discounted prices. More information (including the definitions of hazardous and harmful drinkers) is available in the full consultation document and the impact assessment. Do you want to answer questions on minimum unit pricing? Please select one option.

Yes

Score

0

Page Score

0

## Page 3: A minimum unit price for alcohol

Q9. The impact of minimum unit pricing will depend on the price per unit of alcohol. The government wants to ensure that the chosen price level is targeted and proportionate, whilst achieving a significant reduction of harm. The government is therefore consulting on the introduction of a recommended minimum unit price of 45p. The government estimates a reduction in consumption across all product types of 3.3 per cent, a reduction in crime of 5,240 per year, a reduction in 24,600 alcohol-related hospital admissions and 714 fewer deaths per year after ten years. Do you agree that this minimum unit price level would achieve these aims? Please select one option.

Yes

***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):***

Minimum unit pricing (MUP) is a proportionate, targeted and effective

approach that will have the greatest impact on younger and heavier drinkers. However, Balance urges the Government to set MUP for alcohol of at least 50p for the following reasons: • The University of Sheffield has modelled the effects of MUP on a number of parameters (1). A MUP of 50p compared to a MUP of 45p would save annually an additional 1,000 deaths; 31,000 alcohol-related hospital admissions; 18,000 crimes and would reduce consumption by a further 2.4% • The previous Chief Medical Officer called for a 50p MUP of alcohol in 2009 which at today's value would be in excess of 50p (2) • The Faculty of Public Health supported the call for a MUP of 50p for alcohol in their "12 Steps to Better Health Manifesto" (3) with 50p MUP being 'Step No. 1' • The Association of North East Council's Leaders' and Elected Mayors' Group support MUP set at 50p • Consideration needs to be given to cross-border purchases if a MUP below that proposed for Scotland (50p) is set, particularly in border areas in the North of England

Score

0

Q10. Should other factors or evidence be considered when setting a minimum unit price for alcohol? Please select one option.

Yes

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

MUP should be set at no less than 50p per unit, and regularly reviewed to ensure alcohol does not become more affordable over time. The initial introductory period for MUP provision should be in line with that agreed in Scotland and independent evaluations on effectiveness set up, to include whether the level has been set appropriately. A mechanism for channeling the increased monies received by retailers into reducing the problems caused by alcohol at the local level should be introduced. Evidence from Canada demonstrates that minimum pricing reduces consumption, especially of higher strength drinks, and impacts to a greater degree on off trade sales than on trade (Stockwell et al 2012. Research currently in press (Zhao et al) shows a 10% increase in the minimum price for all alcoholic beverages in British Columbia has resulted in a 31.7% reduction in wholly attributable alcohol deaths. 82% of publicans in the North East (NE) state supermarket promotions are hitting their trade (4). 18 pubs close each week in Britain (5). 70% of publicans in the NE are in support of MUP (4). MUP would close the price difference between pubs and cheapest supermarket deals. • 53% of people in the NE support MUP (7). 81% stated they were more likely to support MUP if it reduced drunk and rowdy behaviour (7) – which evidence suggests it would (1) • 80% of GPs in the NE support MUP (9) • The North East has the highest rate of under 18 alcohol specific hospital admissions (10) and evidence from Sheffield University indicates that a minimum unit price set at 50p would result in larger reductions in alcohol consumption amongst this group • Alcohol harm is costing the North East economy over £1 billion a year (11)

Score

0

Q11. The government wishes to maintain the effectiveness of minimum unit pricing and is therefore proposing to adjust the minimum unit price level over time. 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 automatically be updated in line with inflation each year

Score

0

Q12. 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

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

It would: • Help children through: o Fewer drinking – and those drinking consuming less (1) o Reduced risks of excessive consumption shaping behaviour o Reduced numbers exposed to parental alcohol misuse o Protect children in the family context – alcohol has been identified as a factor in 40% of child protection cases (12) • Help protect current and future victims of domestic abuse, around 40% of which are linked to alcohol (13) • Result in fewer crimes (1), victims of crime and reduced fear of crime • Benefit frontline workers – i.e. reduced assaults on A & E and police staff, time and money saved dealing with excessive alcohol misuse • Benefit drinkers and non - drinkers as dealing with alcohol harm in the North East costs more than £1 billion a year (11) • Benefit community pubs and bars which are finding it difficult to compete with cheap off license sales

Score

0

Page Score

0

## **Page 4: A ban on multi-buy promotions in the off-trade**

Q13. The government is consulting on introducing a ban on multi-buy promotions in the off-trade (e.g. shops and off-licences) as part of its wider strategy to reduce excessive alcohol consumption, and alongside the introduction of a minimum unit price. A ban on multi-buy promotions would therefore not apply to pubs, clubs, bars or restaurants. The term 'multi-buy promotions' refers to alcohol promotions that offer a discount for buying multiple items. 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. As well as being part of a wider strategy to reduce consumption and tackle irresponsible alcohol sales, a ban on multi-buy promotions would also contribute to the government's aim of encouraging people to be aware of how much they drink and the risks of excessive drinking, so that they can make informed choices. The aim of this consultation is to assess support for such a ban and contribute to our understanding of the impact a ban on multi-buy promotions may have. The types of promotion it is proposed that a ban would include, are: two for the price of one, three for the price of two, buy one get one free, buy six and get 20 per cent off, 24 cans of lager costing less than 24 times the cost of a single 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, 3 for £10 where each bottle costs more than £3.33. More information is available in the full consultation document and the impact assessment. Do you want to answer questions on a ban on multi-buy promotions in the off-trade? Please select one option.

Yes

Score

0

Page Score

0

## Page 5: A ban on multi-buy promotions in the off-trade

Q14. Do you think there should be a ban on multi-buy promotions involving alcohol in the off-trade? Please select one option.

Yes

Score

0

Q15. Are there any further offers which should be included in a ban on multi-buy promotions? Please select one option.

Yes

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

We would support an end to multi-buy promotions in the off and on trade as alcohol is addictive and should not be treated like just another product. Indeed any incentive to purchase and consume more than intended – such as money off or reductions to other products or services or voucher points – should be prohibited. This should include packaging alcohol as part of a meal deal or offering free alcohol on flights or as part of first-class rail travel. For the same reasons we believe that all promotions – including those offering money off individual items – should be stopped. Alcohol is not an ordinary product and should not be treated as such.

Score

0

Q16. Should other factors or evidence be taken into account when considering a ban on multi-buy promotions? Please select one option.

Yes

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

• Work carried out by Sheffield University on behalf of the Scottish Government indicated that a ban on multi-buy promotions would increase the effectiveness of MUP. For example, a MUP of 50p plus an off trade discount ban would lead to further falls in consumption resulting in more lives saved, greater falls in hospital admissions, a larger fall in alcohol related crimes and bigger falls in absence days and unemployment (14) • A report presented to the HASC (29/6/2012) by Prof. Nutt suggested that alcohol is the most dangerous drug in the UK beating heroin and crack cocaine into second and third place (15). Yet alcohol, in contrast to those illegal drugs, is as easy to access as regular grocery items. Worse than that, it has been used as a loss leader by supermarkets and in Balance's last price survey was being sold for as little as 12p per unit (16) • Cheap alcohol deals may result in young people drinking more, as highlighted in the Alcohol Concern and Balance Report 'Drinking to Get Drunk' in which 16-17 year-olds were quoted as saying that price promotions 'attracted young people to drink more than they would have' (17) • A joined up policy approach which addresses the price and availability of alcohol as well as the quality and co-ordination of hospital and community services, is both coherent and evidence-based. It will deliver the health outcomes and reductions in alcohol related mortality (1) • Reductions in consumption levels would improve health inequalities as health harms have a greater impact on lower income groups. For example, alcohol related deaths are 45% higher in areas of high deprivation (18).

Score

0

Q17. 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

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

Young people in particular would benefit from a ban on cheap alcohol deals as outlined above. People on low incomes are likely to benefit most from any measure which leads to a reduction in consumption. For example, in the most deprived areas men are five times, and women three times, more likely to die an alcohol related death than those in the least deprived areas (18). Community pubs would benefit as they are currently struggling to compete with cheap supermarket prices. Our front line services would benefit as multi-purchase deals encourage pre-loading which, in turn, leads to more problems in the night time economy. Families would benefit as these deals encourage home drinking where excessive consumption is

hidden and harder to control. The public in general would benefit as consumers would be discouraged from buying and therefore drinking more alcohol than they otherwise would have.

Score

0

Page Score

0

## Page 6: Reviewing the mandatory licensing conditions

Q18. 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 alcohol 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. The government has also committed to consult on whether these mandatory licensing conditions should, where relevant, apply to both the on- and off-trade. This consultation forms part of that review, and will contribute to the government's understanding of how these mandatory conditions are perceived. The five mandatory licensing conditions currently set out in regulations in relation to the supply of alcohol are: a ban on irresponsible promotionsa ban on dispensing alcohol by one person directly into the mouth of anothera requirement to provide free tap water on request to customersa requirement to have an age verification policy to prevent the sale of alcohol to persons under 18 years of age, anda requirement to make available to customers small measures such as half pints or beer or cider or 125ml glasses of wine More information is available in the full consultation document. An explanation of each of these terms can be found on page 20 of the consultation document, in the glossary at the end. Do you want to answer questions on reviewing the mandatory licensing conditions? Please select one option.

Yes

Score

0

Page Score

0

## Page 7: Reviewing the mandatory licensing conditions

Q19. Do you think each of the mandatory licensing conditions is effective in promoting the licensing objectives? For more information on the licensing objectives please see the glossary at the end of the full consultation document. Please select one option (Yes, No, Don't know) from each drop down menu.

	Prevention of crime and disorder	Public safety	Prevention of public nuisance	Protection of children from harm
Irresponsible promotions	Yes	Yes	Yes	Yes
Dispensing alcohol directly into the mouth	Yes	Yes	Yes	Yes
Mandatory provision of free tap water	Yes	Yes	Yes	Yes
Age verification policy	Yes	Yes	Yes	Yes
Mandatory provision of small measures	Yes	Yes	Yes	Yes

Score

0

Q20. Do you think that the mandatory licensing conditions do enough to target irresponsible promotions in pubs and clubs? Please select one option.

No

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

The mandatory conditions are having some effect but need amending. For example, the condition relating to irresponsible promotions should have the clause referring to the need to 'demonstrate a link with crime and disorder' removed as it makes the condition very difficult to use. Similarly, the condition relating to the age verification policies should stipulate the need for a written policy which is advertised within the venue. Furthermore, anything which encourages greater consumption than intended should not be allowed, including: • Price-based promotions • Other incentives, e.g. meal deals or voucher schemes • student 'drink the bar dry' promotions • organised pub crawls associated with students • drinks sold in one large container for consumption from that container, e.g. 'goldfish bowls' • mobile sales, e.g. shots sold from a tray or dispensed from a tank at your table • offering an alcoholic drink cheaper than an one without alcohol, i.e. vodka and coke vs coke alone • the sale of bottles of spirits in on trade premises, seen in some VIP areas of clubs. The 35ml spirit measure should be withdrawn, leaving the 25ml single measure which equates to one unit of alcohol and is easy to track for those counting their alcohol intake.

Score

0

Q21. Are there other issues related to the licensing objectives which could be tackled through a mandatory licensing condition? Please select one option.

Yes

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

• Age verification training • The need to keep a refusals book • Till prompts re age verification (i.e. Challenge 25) • Mandatory training to sell alcohol • Provision and promotion of lower strengths beers and wines • Promotion - not simply provision - of small measures; active promotion of soft drinks • Upselling should be prohibited • Point of sale information should be made compulsory stipulating units of alcohol and the recommended limits together with health harms.

Score

0

Q22. Do you think that 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.

No

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

The problems of alcohol harm are increasingly associated with cheap alcohol sold from off licence premises, yet only one condition applies to the off trade. Surveys and research consistently point to more alcohol being purchased from supermarkets (19, 20) and more consumed at home where problems of domestic abuse and child protection can be hidden. There is also the issue of pre-loading. Almost one in two publicans in Balance's recent survey (4) indicated that they were seeing customers arriving drunk because of cheap supermarket offers. We also know that people who have pre-loaded before they go out into the night-time economy are more likely to be a victim or perpetrator of crime. (20) Irresponsible promotions and the provision and promotion of smaller measures could both be applied to the off trade together with the practices highlighted in our answer to question 10.

Score

0

Page Score

0

## **Page 8: Health as a licensing objective for cumulative impact policies**

Q23. We want to ensure that licensing authorities are able to take alcohol-related health harms into consideration when making decisions about cumulative impact policies (CIPs) which can be used to manage problems

linked to the density of premises in specific areas. 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. We are proposing 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. We expect that those areas with the highest levels of alcohol-related health harm, or fast rising levels of harm from alcohol, will be most likely to use this power. It 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. More information is available in the full consultation document and impact assessment. Do you want to answer questions on health as a licensing objective for cumulative impact policies? Please select one option.

Yes

Score

0

Page Score

0

## Page 9: Health as a licensing objective for cumulative impact policies

Q24. 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):

There are a range of sources available, including:

- A&E data
- Ambulance data
- Alcohol specific hospital admissions
- Alcohol attributable hospital admissions
- Under 18 admissions
- Liver and other alcohol related deaths
- Domestic abuse and child protection data
- Alcohol related crime figures
- Local data sources, e.g. residents' surveys.

In principle, we believe that public health should be a licensing objective in its own right and not tied to CIPs. We do not accept the rationale on p7 of the relevant impact assessment stating that it would be disproportionate because the alcohol industry is already taking action as part of the Responsibility Deal. Promises on alcohol labelling have been made before –

and been broken. What's more, industry efforts to promote unit information are small and sporadic when compared to the weight of pro alcohol marketing. In Balance's latest public opinion survey the public's awareness of alcohol unit is falling – and has been for the last three years. (7)

However, there are some practical difficulties when using public health data.. It is difficult to tie public health data to specific locations such as a licensed premise, particularly an off licence. Also, taking a small geographic area would fail to represent the scale of the problem being dealt with by the public services in that area.

Experience in Scotland suggests that public health data should be used to underpin over-provision policies covering entire local authority areas to ensure the overall availability of alcohol is taken into account.

Furthermore, public health should be a consideration at the highest level in local authorities, playing a central role in planning and economic development.

Q25. 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

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

There is a concern that although the stats from a PCT wide perspective may look compelling, once reduced to neighbourhood / ward size the figure may be small and too easily dismissed. It may be more practical for a public health objective to be linked to borough-wide saturation policies as this is the level at which data becomes meaningful. It also reflects the Scottish experience in areas such as West Dumbartonshire. Furthermore, it gives local politicians the opportunity to take control of the availability of alcohol in their council areas, helping to fulfil their new responsibility for public health.

Score

0

Q26. 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 your answer in the box below, providing evidence to support your response (keeping your views to a maximum of 200 words):

Introducing a public health objective, particularly to support over-provision or saturation policies at the borough-wide level, would enable licensing decisions to be made taking into account the full impact of alcohol harm within that council's boundaries. It would enable local authorities to control the availability of alcohol in their area – and we know from the World Health Organisation (21) that availability affects the level of harm.

Fewer premises within a particular area would reduce the need for competitive pricing. It would limit the availability of alcohol at a local level to young people, which we know from Alcohol Concern's report 'One On Every Corner' (22) is an indicator of harm. It would evidence the hidden harm of alcohol consumption in terms of home drinking. Finally, through sources such as A&E data, it would help to record the level of alcohol-related assaults reporting to A&E, many of which are not reported to and recorded by the police.

Page Score

0

## Page 10: Freeing up responsible businesses

Q27. The government has committed to consult on giving licensing authorities greater freedom to take decisions that reflect the needs of their local community. Following the government's Red Tape Challenge in 2011, three areas of reform were specified: alcohol licensing for certain types of premises providing minimal alcohol sales, temporary event notices (TENs) and the licensing of late night refreshment. This section asks for views on these proposals and suggests further ways to reduce burdens on business. The proposals set out here can be seen alongside work undertaken by the Department for Culture, Media and Sport to remove unnecessary red tape from regulated entertainment. More information on each of these areas for reform is available in the full consultation document. There are five subjects covered in this section. They are: ancillary sales of alcohol occasional provision of licensable activities at community events an extension of the temporary event notice limit at individual premises late night refreshment, and further proposals to reduce burdens on business Do you want to answer questions on freeing up responsible businesses? Please select one option.

No

Score

0

Page Score

0

## Page 11: Freeing up responsible businesses

Q28. Ancillary sales of alcohol For many businesses, the sale of alcohol is only a small part of, or incidental to, their wider activities, and occurs alongside the provision of another product or service (which this consultation refers to as an 'ancillary sale'). For example, a guesthouse might wish to provide wine to its guests with an evening meal or a complimentary bottle of wine in a guest's room, while a hairdresser might wish to offer clients a glass of wine. 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.

*No Response*

Score

0

Q29. If special provisions 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.

*No Response*

Score

0

Q30. 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 suggestions in the box below, keeping your views to a maximum of 200 words:

*No Response*

Q31. 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. Alternatively, a second option is to broaden the definition of 'ancillary sales' to include all businesses (and/or not for profit activities) through the use of a general set of qualification criteria, for example, to the effect that: alcohol must be sold or supplied as a small part or proportion of a sales transaction or contract for a wider service, and the amount of alcohol that could be supplied as part of that contract cannot exceed a prescribed amount. Do you think that the qualification criteria proposed meet this aim?

*No Response*

Score

0

Q32. Do you think that these proposals would significantly reduce the burdens on ancillary sellers? Please select one option in each row.

*No Response*

Score

0

Q33. Do you think these proposals would impact adversely on one or more of the licensing objectives? Please select one option.

*No Response*

Score

0

Q34. 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 response to a maximum of 200 words:

*No Response*

Page Score

0

## Page 12: Freeing up responsible businesses

Q35. 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.

*No Response*

Score

0

Q36. What impact do you think a locally determined notification would have on organisers of community events? Please select one option in each row.

*No Response*

Score

0

Page Score

0

## Page 13: Freeing up responsible businesses

Q37. Should the number of TENs which can be given in respect of individual premises be increased? Please select one option.

*No Response*

Score

0

Q38. If you answered yes, please select one option to indicate which you would prefer. Please select one option.

*No Response*

Score

0

Page Score

0

## Page 14: Freeing up responsible businesses

Q39. 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.

*No Response*

Score

0

Q40. 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.

*No Response*

Score

0

Q41. 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).

*No Response*

Page Score

0

## Page 15: Freeing up responsible businesses

Q42. Do you agree with each of the following proposals? Please select one option in each row.

*No Response*

Score

0

Q43. Do you think that each of the following would reduce the overall burdens on business? Please select one option in each row.

*No Response*

Score

0

Q44. 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.

*No Response*

Score

0

Q45. 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 keep your views to a maximum of 200 words.)

*No Response*

Page Score

0

## Page 16: Impact assessments

Q46. Impact assessments for the proposals in this consultation have been published alongside the full consultation document. 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
Minimum unit pricing		X	
Multi-buy promotions			X
Health as a licensing objective for cumulative impact		X	
Ancillary sales of alcohol			X
Temporary event notices			X

<b>Late night refreshment</b>			X
<b>Removing the duty to advertise licence applications in a local newspaper</b>			X
<b>Sales of alcohol at motorway service stations</b>			X
<b>Personal licences</b>			X

Score

0

Q47. Do you have any comments on the methodologies or assumptions used in the impact assessments? If yes, please specify in the box below, clearly referencing the impact assessment and page to which you refer (keeping your views to a maximum of 400 words).

*No Response*

Page Score

0

## Scoring Summary

Pages	Total
1. About you	0
2. A minimum unit price for alcohol	0
3. A minimum unit price for alcohol	0
4. A ban on multi-buy promotions in the off-trade	0
5. A ban on multi-buy promotions in the off-trade	0
6. Reviewing the mandatory licensing conditions	0
7. Reviewing the mandatory licensing conditions	0
8. Health as a licensing objective for cumulative impact policies	0
9. Health as a licensing objective for cumulative impact policies	0
10. Freeing up responsible businesses	0

11. Freeing up responsible businesses	0
12. Freeing up responsible businesses	0
13. Freeing up responsible businesses	0
14. Freeing up responsible businesses	0
15. Freeing up responsible businesses	0
16. Impact assessments	0
<b>Total Survey Score:</b>	0

# Alcohol strategy consultation

User Details - 5453047

**Date Started:** 04/02/2013 10:19:08 **Date Ended:** 04/02/2013 10:41:05

**Time taken:** 21 mins, 57 secs **IP Address:** n/a

**Unique ID:** n/a

## Page 1: About you

Q1. Please select if you would like your response or personal details to be treated as confidential.

**No Response**

Score

0

Q2. Which of the following best describes you or the professional interest you represent? Please select one option from the menu below.

Small or medium sized enterprise involved in licensed trade/club premises (up to 50 employees)

***Please specify which organisation, licensing authority or police force you represent in the box below:***

Nottingham BID Company Limited (a Business Improvement District).

Score

0

Q3. If you are responding on behalf of an organisation or interest group, please write in the box below the number of members in your group or organisation.

770

Q4. How did you obtain the views of your members? Please explain in the box below keeping your response to a maximum of 100 words.

**No Response**

Q5. Please indicate in which region you or your organisation is based. Please select one option from the menu below.

East Midlands

Score

0

Q6. If you are responding as a member of the public, what is your gender? Please select one option.

**No Response**

Score

0

Q7. If you are responding as a member of the public, what is your age?

Please select one option.

**No Response**

Score

0

Page Score

0

## Page 2: A minimum unit price for alcohol

Q8. In the alcohol strategy, the government committed to introducing a minimum unit price for alcohol in England and Wales. This consultation will contribute to the debate on the most appropriate price per unit and the mechanism by which, once set, minimum unit pricing would remain effective. It is also an opportunity for interested parties to raise other issues around minimum unit pricing. The purpose of minimum unit pricing is to reduce alcohol consumption, particularly by the most hazardous and harmful drinkers who tend to show a preference for the cheapest alcohol products. By doing so the government estimates there will be a reduction in the associated crime and health harms, especially the numbers of hospital admissions, alcohol-related deaths and alcohol-related crimes. Minimum unit pricing is not intended disproportionately to affect responsible drinkers or particular social groups but to reduce the availability of alcohol sold at very low or heavily discounted prices. More information (including the definitions of hazardous and harmful drinkers) is available in the full consultation document and the impact assessment. Do you want to answer questions on minimum unit pricing? Please select one option.

Yes

Score

0

Page Score

0

## Page 3: A minimum unit price for alcohol

Q9. The impact of minimum unit pricing will depend on the price per unit of alcohol. The government wants to ensure that the chosen price level is targeted and proportionate, whilst achieving a significant reduction of harm. The government is therefore consulting on the introduction of a recommended minimum unit price of 45p. The government estimates a reduction in consumption across all product types of 3.3 per cent, a reduction in crime of 5,240 per year, a reduction in 24,600 alcohol-related hospital admissions and 714 fewer deaths per year after ten years. Do you agree that this minimum unit price level would achieve these aims? Please select one option.

No

***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):***

We don't believe that there is sufficient evidence to suggest that any level

would achieve these aims. Furthermore, there are other measures already available that are not being effectively used.

Score

0

Q10. Should other factors or evidence be considered when setting a minimum unit price for alcohol? Please select one option.

No

Score

0

Q11. The government wishes to maintain the effectiveness of minimum unit pricing and is therefore proposing to adjust the minimum unit price level over time. 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

Score

0

Q12. 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

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

Responsible consumers of alcohol and the businesses who supply them.

Score

0

Page Score

0

## **Page 4: A ban on multi-buy promotions in the off-trade**

Q13. The government is consulting on introducing a ban on multi-buy promotions in the off-trade (e.g. shops and off-licences) as part of its wider strategy to reduce excessive alcohol consumption, and alongside the introduction of a minimum unit price. A ban on multi-buy promotions would therefore not apply to pubs, clubs, bars or restaurants. The term 'multi-buy promotions' refers to alcohol promotions that offer a discount for buying multiple items. 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. As well as being part of a wider strategy to reduce consumption and tackle irresponsible alcohol sales, a ban on multi-buy promotions would also contribute to the government's aim of encouraging people to be aware of how much they drink and the risks of excessive drinking, so that they can make informed choices. The aim of this

consultation is to assess support for such a ban and contribute to our understanding of the impact a ban on multi-buy promotions may have. The types of promotion it is proposed that a ban would include, are: two for the price of one, three for the price of two, buy one get one free, buy six and get 20 per cent off, 24 cans of lager costing less than 24 times the cost of a single 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, 3 for £10 where each bottle costs more than £3.33. More information is available in the full consultation document and the impact assessment. Do you want to answer questions on a ban on multi-buy promotions in the off-trade? Please select one option.

Yes

Score

0

Page Score

0

## Page 5: A ban on multi-buy promotions in the off-trade

Q14. Do you think there should be a ban on multi-buy promotions involving alcohol in the off-trade? Please select one option.

No

Score

0

Q15. Are there any further offers which should be included in a ban on multi-buy promotions? Please select one option.

No

Score

0

Q16. Should other factors or evidence be taken into account when considering a ban on multi-buy promotions? Please select one option.

Yes

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

The effect on responsible consumers and the businesses that supply them.

Score

0

Q17. 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

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

Responsible consumers and the businesses that supply them.

Score

0

Page Score

0

## Page 6: Reviewing the mandatory licensing conditions

Q18. 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 alcohol 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. The government has also committed to consult on whether these mandatory licensing conditions should, where relevant, apply to both the on- and off-trade. This consultation forms part of that review, and will contribute to the government's understanding of how these mandatory conditions are perceived. The five mandatory licensing conditions currently set out in regulations in relation to the supply of alcohol are: a ban on irresponsible promotionsa ban on dispensing alcohol by one person directly into the mouth of anothera requirement to provide free tap water on request to customersa requirement to have an age verification policy to prevent the sale of alcohol to persons under 18 years of age, anda requirement to make available to customers small measures such as half pints or beer or cider or 125ml glasses of wine More information is available in the full consultation document. An explanation of each of these terms can be found on page 20 of the consultation document, in the glossary at the end. Do you want to answer questions on reviewing the mandatory licensing conditions? Please select one option.

Yes

Score

0

Page Score

0

## Page 7: Reviewing the mandatory licensing conditions

Q19. Do you think each of the mandatory licensing conditions is effective in promoting the licensing objectives? For more information on the licensing objectives please see the glossary at the end of the full consultation document. Please select one option (Yes, No, Don't know) from each drop down menu.

	Prevention of crime and disorder	Public safety	Prevention of public nuisance	Protection of children from harm
Irresponsible	No	No	No	No

<b>promotions</b>				
<b>Dispensing alcohol directly into the mouth</b>	No	No	No	No
<b>Mandatory provision of free tap water</b>	Yes	No	No	No
<b>Age verification policy</b>	Yes	No	No	Yes
<b>Mandatory provision of small measures</b>	Don't know	Don't know	Don't know	Don't know

Score

0

Q20. Do you think that the mandatory licensing conditions do enough to target irresponsible promotions in pubs and clubs? Please select one option.

No

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

Make them easier to understand and apply, ensure they are appropriate.

Score

0

Q21. Are there other issues related to the licensing objectives which could be tackled through a mandatory licensing condition? Please select one option.

No

Score

0

Q22. Do you think that 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.

No

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

Too many apply to the on-trade, this number should be reduced (without increasing the total number of conditions).

Score

0

Page Score

0

**Page 8: Health as a licensing objective for**

## cumulative impact policies

Q23. We want to ensure that licensing authorities are able to take alcohol-related health harms into consideration when making decisions about cumulative impact policies (CIPs) which can be used to manage problems linked to the density of premises in specific areas. 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. We are proposing 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. We expect that those areas with the highest levels of alcohol-related health harm, or fast rising levels of harm from alcohol, will be most likely to use this power. It 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. More information is available in the full consultation document and impact assessment. Do you want to answer questions on health as a licensing objective for cumulative impact policies? Please select one option.

Yes

Score

0

Page Score

0

## Page 9: Health as a licensing objective for cumulative impact policies

Q24. 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):

*No Response*

Q25. 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.

*No Response*

Score

0

Q26. 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 your answer in the box below, providing evidence to support your response (keeping your

views to a maximum of 200 words):

It would mean that a decision is based on evidence (i.e. data on alcohol related health harms) that is not specific to licensed premises in that area. This could result in a decision being taken to introduce a cumulative impact policy which has a negative effect on an area in terms of inward investment.

There are other powers available to manage licensed premises effectively in an area, rather than applying blanket approaches such as a Cumulative Impact Policy, which tend to be used as a blanket excuse to object to any application, punishing the vast majority of responsible operators.

Page Score

0

## Page 10: Freeing up responsible businesses

Q27. The government has committed to consult on giving licensing authorities greater freedom to take decisions that reflect the needs of their local community. Following the government's Red Tape Challenge in 2011, three areas of reform were specified: alcohol licensing for certain types of premises providing minimal alcohol sales, temporary event notices (TENs) and the licensing of late night refreshment. This section asks for views on these proposals and suggests further ways to reduce burdens on business. The proposals set out here can be seen alongside work undertaken by the Department for Culture, Media and Sport to remove unnecessary red tape from regulated entertainment. More information on each of these areas for reform is available in the full consultation document. There are five subjects covered in this section. They are: ancillary sales of alcohol occasional provision of licensable activities at community events an extension of the temporary event notice limit at individual premises late night refreshment, and further proposals to reduce burdens on business Do you want to answer questions on freeing up responsible businesses? Please select one option.

Yes

Score

0

Page Score

0

## Page 11: Freeing up responsible businesses

Q28. Ancillary sales of alcohol For many businesses, the sale of alcohol is only a small part of, or incidental to, their wider activities, and occurs alongside the provision of another product or service (which this consultation refers to as an 'ancillary sale'). For example, a guesthouse might wish to provide wine to its guests with an evening meal or a complimentary bottle of wine in a guest's room, while a hairdresser might wish to offer clients a glass of wine. 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
<b>The provision should be limited to a specific list of certain types of business and the kinds of sales they make</b>		X	
<b>The provision should be available to all businesses providing they meet certain qualification criteria to be an ancillary seller</b>	X		
<b>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 the above options</b>		X	

Score

0

Q29. If special provisions 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.

	Yes	No	Don't know
<b>Accommodation providers, providing alcohol alongside accommodation as part of the contract</b>	X		
<b>Hair and beauty salons, providing alcohol alongside a hair or beauty treatment</b>	X		
<b>Florists, providing alcohol alongside the purchase of flowers</b>	X		
<b>Cultural organisations, such as theatres, cinemas and museums, providing alcohol alongside cultural events as part of the entry ticket</b>	X		
<b>Regular charitable events, providing alcohol as part of the wider occasion</b>	X		

Score

0

Q30. 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 suggestions in the box below, keeping your views to a maximum of 200 words:

*No Response*

Q31. 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. Alternatively, a second option is to broaden the definition of 'ancillary sales' to include all businesses (and/or not for profit activities) through the use of a general set of qualification criteria, for example, to the effect that: alcohol must be sold or supplied as a small part or proportion of a sales transaction or contract for a wider service, and the amount of alcohol that could be supplied as part of that contract cannot exceed a prescribed amount. Do you think that the qualification criteria proposed meet this aim?

Yes

Score

0

Q32. 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
<b>Allow premises making ancillary sales to request in their premises licence application that the requirement for a personal licence holder be removed</b>		X	
<b>Introduce a new, light-touch form of authorisation for premises making ancillary sales - an ASN but retaining the need for a personal licence holder</b>		X	
<b>Introduce a new, light touch form of authorisation for premises making ancillary sales - an ASN - with no requirement for a personal licence holder</b>	X		

Score

0

Q33. Do you think these proposals would impact adversely on one or more of the licensing objectives? Please select one option.

	Yes	No	Don't know
<b>Allow premises making ancillary sales to request in their premises licence application that the requirement for a personal licence holder be removed</b>		X	
<b>Introduce a new, light-touch form of authorisation</b>		X	

<b>for premises making ancillary sales - an ASN but retaining the need for a personal licence holder</b>			
<b>Introduce a new, light touch form of authorisation for premises making ancillary sales - an ASN - with no requirement for a personal licence holder</b>		X	

Score

0

Q34. 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 response to a maximum of 200 words:

*No Response*

Page Score

0

## Page 12: Freeing up responsible businesses

Q35. 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

Score

0

Q36. 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
<b>Reduce the burden</b>	X		
<b>Increase the burden</b>		X	

Score

0

Page Score

0

## Page 13: Freeing up responsible businesses

Q37. Should the number of TENs which can be given in respect of individual premises be increased? Please select one option.

Yes

Score

0

Q38. If you answered yes, please select one option to indicate which you would prefer. Please select one option.

18

Score

0

Page Score

0

## Page 14: Freeing up responsible businesses

Q39. 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
<b>Determining that premises in certain areas are exempt</b>	X		
<b>Determining that certain premises types are exempt in their local area</b>	X		

Score

0

Q40. 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

Score

0

Q41. 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).

*No Response*

Page Score

0

## Page 15: Freeing up responsible businesses

Q42. Do you agree with each of the following proposals? Please select one option in each row.

	Yes	No	Don't know
<b>Remove requirements to advertise licensing applications in local newspapers</b>	X		
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs for the on and off-trade</b>	X		
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs, but only in respect of overnight accommodation - lodges</b>		X	
<b>Remove or simplify requirements to renew personal licences under the 2003 Act</b>	X		

Score

0

Q43. 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
<b>Remove requirements to advertise licensing applications in local newspapers</b>	X		
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs for the on and off-trade</b>	X		
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs, but only in respect of overnight accommodation - lodges</b>		X	
<b>Remove or simplify requirements to renew personal licences under the 2003 Act</b>	X		

Score

0

Q44. 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.

**No Response**

Score

0

Q45. 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 keep your views to a maximum of 200 words.)

**No Response**

Page Score

0

## Page 16: Impact assessments

Q46. Impact assessments for the proposals in this consultation have been published alongside the full consultation document. 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
<b>Minimum unit pricing</b>			X

<b>Multi-buy promotions</b>			X
<b>Health as a licensing objective for cumulative impact</b>			X
<b>Ancillary sales of alcohol</b>			X
<b>Temporary event notices</b>			X
<b>Late night refreshment</b>			X
<b>Removing the duty to advertise licence applications in a local newspaper</b>			X
<b>Sales of alcohol at motorway service stations</b>			X
<b>Personal licences</b>			X

Score

0

Q47. Do you have any comments on the methodologies or assumptions used in the impact assessments? If yes, please specify in the box below, clearly referencing the impact assessment and page to which you refer (keeping your views to a maximum of 400 words).

*No Response*

Page Score

0

## Scoring Summary

<b>Pages</b>	<b>Total</b>
1. About you	0
2. A minimum unit price for alcohol	0
3. A minimum unit price for alcohol	0
4. A ban on multi-buy promotions in the off-trade	0
5. A ban on multi-buy promotions in the off-trade	0
6. Reviewing the mandatory licensing conditions	0
7. Reviewing the mandatory licensing conditions	0

8. Health as a licensing objective for cumulative impact policies	0
9. Health as a licensing objective for cumulative impact policies	0
10. Freeing up responsible businesses	0
11. Freeing up responsible businesses	0
12. Freeing up responsible businesses	0
13. Freeing up responsible businesses	0
14. Freeing up responsible businesses	0
15. Freeing up responsible businesses	0
16. Impact assessments	0
<b>Total Survey Score:</b>	<b>0</b>

# Alcohol strategy consultation

User Details - 5326722

**Date Started:** 10/01/2013 13:27:19      **Date Ended:** 04/02/2013 10:43:34

**Time taken:** 597 hrs, 16 mins, 15 secs   **IP Address:** n/a

**Unique ID:** n/a

## Page 1: About you

Q1. Please select if you would like your response or personal details to be treated as confidential.

**No Response**

Score

0

Q2. Which of the following best describes you or the professional interest you represent? Please select one option from the menu below.

Local government (other)

***Please specify which organisation, licensing authority or police force you represent in the box below:***

RUOK Brighton & Hove City Council

Score

0

Q3. If you are responding on behalf of an organisation or interest group, please write in the box below the number of members in your group or organisation.

10

Q4. How did you obtain the views of your members? Please explain in the box below keeping your response to a maximum of 100 words.

Managers and staff responded individually following team discussion and responses collated together here

Q5. Please indicate in which region you or your organisation is based.

Please select one option from the menu below.

South East England

Score

0

Q6. If you are responding as a member of the public, what is your gender? Please select one option.

**No Response**

Score

0

Q7. If you are responding as a member of the public, what is your age?

Please select one option.

**No Response**

Score

0

Page Score

0

## Page 2: A minimum unit price for alcohol

Q8. In the alcohol strategy, the government committed to introducing a minimum unit price for alcohol in England and Wales. This consultation will contribute to the debate on the most appropriate price per unit and the mechanism by which, once set, minimum unit pricing would remain effective. It is also an opportunity for interested parties to raise other issues around minimum unit pricing. The purpose of minimum unit pricing is to reduce alcohol consumption, particularly by the most hazardous and harmful drinkers who tend to show a preference for the cheapest alcohol products. By doing so the government estimates there will be a reduction in the associated crime and health harms, especially the numbers of hospital admissions, alcohol-related deaths and alcohol-related crimes. Minimum unit pricing is not intended disproportionately to affect responsible drinkers or particular social groups but to reduce the availability of alcohol sold at very low or heavily discounted prices. More information (including the definitions of hazardous and harmful drinkers) is available in the full consultation document and the impact assessment. Do you want to answer questions on minimum unit pricing? Please select one option.

Yes

Score

0

Page Score

0

## Page 3: A minimum unit price for alcohol

Q9. The impact of minimum unit pricing will depend on the price per unit of alcohol. The government wants to ensure that the chosen price level is targeted and proportionate, whilst achieving a significant reduction of harm. The government is therefore consulting on the introduction of a recommended minimum unit price of 45p. The government estimates a reduction in consumption across all product types of 3.3 per cent, a reduction in crime of 5,240 per year, a reduction in 24,600 alcohol-related hospital admissions and 714 fewer deaths per year after ten years. Do you agree that this minimum unit price level would achieve these aims? Please select one option.

Yes

***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):***

The MUP set at 45p will mean that some people will drink less alcohol as

they will not be able to afford to drink to current levels. This will aid the reduction of alcohol fuelled crime but only for those groups who choose to drink very cheap alcohol for example people and young people under 18 and students

Score

0

Q10. Should other factors or evidence be considered when setting a minimum unit price for alcohol? Please select one option.

Yes

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

Possible negative impacts of the planned increase: Increase in crime due to bootlegging alcohol and stealing to pay for more expensive alcohol Illegal import Unsafe illegal alcohol coming on market Increase in health risks from unsafe home made alcohol Increase in health risks due to consumption of products containing alcohol that are not intended for human consumption Increase in use of other substances ie replace alcohol with cheaper street drugs Increase in criminalisation of sections of public who move from legal alcohol use to illegal substance use as direct result of this pricing system This particularly puts young people at risk of long term substance misuse issues

Score

0

Q11. The government wishes to maintain the effectiveness of minimum unit pricing and is therefore proposing to adjust the minimum unit price level over time. 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

Score

0

Q12. 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

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

Young people Poor people Most vulnerable people in society People on benefits People with fixed income street homeless Alcohol dependent people Those with MH issues who self medicate to cope with daily life and will need to replace alcohol use with another substance and will therefore become criminalised Gang crime, protectionism, violent crime, trafficking, illegal trade will become increasing problems

Score

0

Page Score

0

## Page 4: A ban on multi-buy promotions in the off-trade

Q13. The government is consulting on introducing a ban on multi-buy promotions in the off-trade (e.g. shops and off-licences) as part of its wider strategy to reduce excessive alcohol consumption, and alongside the introduction of a minimum unit price. A ban on multi-buy promotions would therefore not apply to pubs, clubs, bars or restaurants. The term 'multi-buy promotions' refers to alcohol promotions that offer a discount for buying multiple items. 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. As well as being part of a wider strategy to reduce consumption and tackle irresponsible alcohol sales, a ban on multi-buy promotions would also contribute to the government's aim of encouraging people to be aware of how much they drink and the risks of excessive drinking, so that they can make informed choices. The aim of this consultation is to assess support for such a ban and contribute to our understanding of the impact a ban on multi-buy promotions may have. The types of promotion it is proposed that a ban would include, are: two for the price of one, three for the price of two, buy one get one free, buy six and get 20 per cent off, 24 cans of lager costing less than 24 times the cost of a single 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, 3 for £10 where each bottle costs more than £3.33. More information is available in the full consultation document and the impact assessment. Do you want to answer questions on a ban on multi-buy promotions in the off-trade? Please select one option.

Yes

Score

0

Page Score

0

## Page 5: A ban on multi-buy promotions in the off-trade

Q14. Do you think there should be a ban on multi-buy promotions involving alcohol in the off-trade? Please select one option.

Yes

Score

0

Q15. Are there any further offers which should be included in a ban on multi-buy promotions? Please select one option.

Don't know

Score

0

Q16. Should other factors or evidence be taken into account when considering a ban on multi-buy promotions? Please select one option.

Don't know

Score

0

Q17. 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

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

Poorer people Families Those on limited income

Score

0

Page Score

0

## Page 6: Reviewing the mandatory licensing conditions

Q18. 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 alcohol 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. The government has also committed to consult on whether these mandatory licensing conditions should, where relevant, apply to both the on- and off-trade. This consultation forms part of that review, and will contribute to the government's understanding of how these mandatory conditions are perceived. The five mandatory licensing conditions currently set out in regulations in relation to the supply of alcohol are: a ban on irresponsible promotions a ban on dispensing alcohol by one person directly into the mouth of another a requirement to provide free tap water on request to customers a requirement to have an age verification policy to prevent the sale of alcohol to persons under 18 years of age, and a requirement to make available to customers small measures such as half pints or beer or cider or 125ml glasses of wine More information is available in the full consultation document. An explanation of each of these terms can be found on page 20 of the consultation document, in the glossary at the end. Do you want to answer questions on reviewing the mandatory licensing conditions? Please select one option.

Yes

Score

0

Page Score

0

## Page 7: Reviewing the mandatory licensing conditions

Q19. Do you think each of the mandatory licensing conditions is effective in promoting the licensing objectives? For more information on the licensing objectives please see the glossary at the end of the full consultation document. Please select one option (Yes, No, Don't know) from each drop down menu.

	Prevention of crime and disorder	Public safety	Prevention of public nuisance	Protection of children from harm
Irresponsible promotions	Yes	Yes	Yes	Yes
Dispensing alcohol directly into the mouth	Yes	Yes	Yes	Yes
Mandatory provision of free tap water	Yes	Yes	Yes	Yes
Age verification policy	Yes	Yes	Yes	Yes
Mandatory provision of small measures	Yes	Yes	Yes	Yes

Score

0

Q20. Do you think that the mandatory licensing conditions do enough to target irresponsible promotions in pubs and clubs? Please select one option.

No

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

Include ban on mulit buy promotions

Score

0

Q21. Are there other issues related to the licensing objectives which could be tackled through a mandatory licensing condition? Please select one option.

Don't know

Score

0

Q22. Do you think that 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.

Don't know

Score

0

Page Score

0

## **Page 8: Health as a licensing objective for cumulative impact policies**

Q23. We want to ensure that licensing authorities are able to take alcohol-related health harms into consideration when making decisions about cumulative impact policies (CIPs) which can be used to manage problems linked to the density of premises in specific areas. 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. We are proposing 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. We expect that those areas with the highest levels of alcohol-related health harm, or fast rising levels of harm from alcohol, will be most likely to use this power. It 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. More information is available in the full consultation document and impact assessment. Do you want to answer questions on health as a licensing objective for cumulative impact policies? Please select one option.

Yes

Score

0

Page Score

0

## **Page 9: Health as a licensing objective for cumulative impact policies**

Q24. 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):

A&E admissions data  
Joint strategic health assessments  
ambulance data

Q25. 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.

No

Score

0

Q26. 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 your answer in the box below, providing evidence to support your response (keeping your views to a maximum of 200 words):

Useful to look at wider impact of alcohol on health & emergency services

Page Score

0

## Page 10: Freeing up responsible businesses

Q27. The government has committed to consult on giving licensing authorities greater freedom to take decisions that reflect the needs of their local community. Following the government's Red Tape Challenge in 2011, three areas of reform were specified: alcohol licensing for certain types of premises providing minimal alcohol sales, temporary event notices (TENs) and the licensing of late night refreshment. This section asks for views on these proposals and suggests further ways to reduce burdens on business. The proposals set out here can be seen alongside work undertaken by the Department for Culture, Media and Sport to remove unnecessary red tape from regulated entertainment. More information on each of these areas for reform is available in the full consultation document. There are five subjects covered in this section. They are: ancillary sales of alcohol occasional provision of licensable activities at community events an extension of the temporary event notice limit at individual premises late night refreshment, and further proposals to reduce burdens on business Do you want to answer questions on freeing up responsible businesses? Please select one option.

Yes

Score

0

Page Score

0

## Page 11: Freeing up responsible businesses

Q28. Ancillary sales of alcohol For many businesses, the sale of alcohol is only a small part of, or incidental to, their wider activities, and occurs alongside the provision of another product or service (which this consultation refers to as an 'ancillary sale'). For example, a guesthouse might wish to provide wine to its guests with an evening meal or a

complimentary bottle of wine in a guest's room, while a hairdresser might wish to offer clients a glass of wine. 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
<b>The provision should be limited to a specific list of certain types of business and the kinds of sales they make</b>		X	
<b>The provision should be available to all businesses providing they meet certain qualification criteria to be an ancillary seller</b>		X	
<b>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 the above options</b>		X	

Score

0

Q29. If special provisions 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.

	Yes	No	Don't know
<b>Accommodation providers, providing alcohol alongside accommodation as part of the contract</b>		X	
<b>Hair and beauty salons, providing alcohol alongside a hair or beauty treatment</b>		X	
<b>Florists, providing alcohol alongside the purchase of flowers</b>		X	
<b>Cultural organisations, such as theatres, cinemas and museums, providing alcohol alongside cultural events as part of the entry ticket</b>		X	
<b>Regular charitable events, providing alcohol as part of the wider occasion</b>		X	

Score

0

Q30. 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 suggestions in the box below, keeping your views to a maximum of 200 words:

NO

Q31. 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. Alternatively, a second option is to broaden the definition of 'ancillary sales' to include all businesses (and/or not for profit activities) through the use of a general set of qualification criteria, for example, to the effect that: alcohol must be sold or supplied as a small part or proportion of a sales transaction or contract for a wider service, and the amount of alcohol that could be supplied as part of that contract cannot exceed a prescribed amount. Do you think that the qualification criteria proposed meet this aim?

No

***Please use the space below to provide further comments (keeping your views to a maximum of 200 words):***

We should not make licensing easier and should not allow ancillary sellers provision within licensing act

Score

0

Q32. 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
<b>Allow premises making ancillary sales to request in their premises licence application that the requirement for a personal licence holder be removed</b>		X	
<b>Introduce a new, light-touch form of authorisation for premises making ancillary sales - an ASN but retaining the need for a personal licence holder</b>		X	
<b>Introduce a new, light touch form of authorisation for premises making ancillary sales - an ASN - with no requirement for a personal licence holder</b>		X	

Score

0

Q33. Do you think these proposals would impact adversely on one or more of the licensing objectives? Please select one option.

	Yes	No	Don't know
<b>Allow premises making ancillary sales to request in their premises licence application that the requirement for a personal licence holder be removed</b>		X	
<b>Introduce a new, light-touch form of authorisation for premises making ancillary sales - an ASN but retaining the need for a personal licence holder</b>		X	
<b>Introduce a new, light touch form of authorisation for premises making ancillary sales - an ASN - with no requirement for a personal licence holder</b>		X	

Score

0

Q34. 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 response to a maximum of 200 words:

NO lighter touch

This will encourage loop holes and promote normalisation of alcohol in daily life which is a risky message to promote. It is inconsistent to free up business at expense of public health. Legislation around alcohol and licensing should promote people's safety. This will not be achieved through relaxation in licensing laws

Page Score

0

## Page 12: Freeing up responsible businesses

Q35. 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.

No

Score

0

Q36. 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
<b>Reduce the burden</b>		X	
<b>Increase the burden</b>	X		

Score

0

Page Score

0

## Page 13: Freeing up responsible businesses

Q37. Should the number of TENs which can be given in respect of individual premises be increased? Please select one option.

Yes

Score

0

Q38. If you answered yes, please select one option to indicate which you would prefer. Please select one option.

18

Score

0

Page Score

0

## Page 14: Freeing up responsible businesses

Q39. 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
<b>Determining that premises in certain areas are exempt</b>		X	
<b>Determining that certain premises types are exempt in their local area</b>		X	

Score

0

Q40. 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.

No

Score

0

Q41. 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).

This is a completely irresponsible suggestion

Page Score

0

## Page 15: Freeing up responsible businesses

Q42. Do you agree with each of the following proposals? Please select one option in each row.

	Yes	No	Don't know
<b>Remove requirements to advertise licensing applications in local newspapers</b>	X		
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs for the on and off-trade</b>		X	
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs, but only in respect of overnight accommodation - lodges</b>	X		
<b>Remove or simplify requirements to renew personal licences under the 2003 Act</b>		X	

Score

0

Q43. 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
<b>Remove requirements to advertise licensing applications in local newspapers</b>		X	
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs for the on and off-trade</b>		X	
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs, but only in respect of overnight accommodation - lodges</b>		X	
<b>Remove or simplify requirements to renew personal licences under the 2003 Act</b>		X	

Score

0

Q44. 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.

	Yes	No	Don't know
<b>Remove requirements to advertise licensing applications in local newspapers</b>		X	
<b>Remove the centrally imposed prohibition on the</b>	X		

sale of alcohol at MSAs for the on and off-trade			
Remove the centrally imposed prohibition on the sale of alcohol at MSAs, but only in respect of overnight accommodation - lodges		X	
Remove or simplify requirements to renew personal licences under the 2003 Act	X		

Score

0

Q45. 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 keep your views to a maximum of 200 words.)

*No Response*

Page Score

0

## Page 16: Impact assessments

Q46. Impact assessments for the proposals in this consultation have been published alongside the full consultation document. 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.

*No Response*

Score

0

Q47. Do you have any comments on the methodologies or assumptions used in the impact assessments? If yes, please specify in the box below, clearly referencing the impact assessment and page to which you refer (keeping your views to a maximum of 400 words).

*No Response*

Page Score

0

## Scoring Summary

Pages	Total
1. About you	0
2. A minimum unit price for alcohol	0
3. A minimum unit price for alcohol	0
4. A ban on multi-buy promotions in the	0

off-trade	
5. A ban on multi-buy promotions in the off-trade	0
6. Reviewing the mandatory licensing conditions	0
7. Reviewing the mandatory licensing conditions	0
8. Health as a licensing objective for cumulative impact policies	0
9. Health as a licensing objective for cumulative impact policies	0
10. Freeing up responsible businesses	0
11. Freeing up responsible businesses	0
12. Freeing up responsible businesses	0
13. Freeing up responsible businesses	0
14. Freeing up responsible businesses	0
15. Freeing up responsible businesses	0
16. Impact assessments	0
<b>Total Survey Score:</b>	<b>0</b>

# Alcohol strategy consultation

User Details - 5306968

**Date Started:** 07/01/2013 13:16:53      **Date Ended:** 04/02/2013 10:52:20

**Time taken:** 669 hrs, 35 mins, 27 secs   **IP Address:** n/a

**Unique ID:** n/a

## Page 1: About you

Q1. Please select if you would like your response or personal details to be treated as confidential.

*No Response*

Score

0

Q2. Which of the following best describes you or the professional interest you represent? Please select one option from the menu below.

Police force

***Please specify which organisation, licensing authority or police force you represent in the box below:***

Derbyshire Constabulary, Butterley Hall, Ripley. DE5 3RS

Score

0

Q3. If you are responding on behalf of an organisation or interest group, please write in the box below the number of members in your group or organisation.

2000

Q4. How did you obtain the views of your members? Please explain in the box below keeping your response to a maximum of 100 words.

Email and face to face consultation with Licensing Enforcement Groups and Safer Neighbourhood teams.

Q5. Please indicate in which region you or your organisation is based.

Please select one option from the menu below.

East Midlands

Score

0

Q6. If you are responding as a member of the public, what is your gender? Please select one option.

*No Response*

Score

0

Q7. If you are responding as a member of the public, what is your age?

Please select one option.

*No Response*

Score

0

Page Score

0

## Page 2: A minimum unit price for alcohol

Q8. In the alcohol strategy, the government committed to introducing a minimum unit price for alcohol in England and Wales. This consultation will contribute to the debate on the most appropriate price per unit and the mechanism by which, once set, minimum unit pricing would remain effective. It is also an opportunity for interested parties to raise other issues around minimum unit pricing. The purpose of minimum unit pricing is to reduce alcohol consumption, particularly by the most hazardous and harmful drinkers who tend to show a preference for the cheapest alcohol products. By doing so the government estimates there will be a reduction in the associated crime and health harms, especially the numbers of hospital admissions, alcohol-related deaths and alcohol-related crimes. Minimum unit pricing is not intended disproportionately to affect responsible drinkers or particular social groups but to reduce the availability of alcohol sold at very low or heavily discounted prices. More information (including the definitions of hazardous and harmful drinkers) is available in the full consultation document and the impact assessment. Do you want to answer questions on minimum unit pricing? Please select one option.

Yes

Score

0

Page Score

0

## Page 3: A minimum unit price for alcohol

Q9. The impact of minimum unit pricing will depend on the price per unit of alcohol. The government wants to ensure that the chosen price level is targeted and proportionate, whilst achieving a significant reduction of harm. The government is therefore consulting on the introduction of a recommended minimum unit price of 45p. The government estimates a reduction in consumption across all product types of 3.3 per cent, a reduction in crime of 5,240 per year, a reduction in 24,600 alcohol-related hospital admissions and 714 fewer deaths per year after ten years. Do you agree that this minimum unit price level would achieve these aims? Please select one option.

No

Score

0

Q10. Should other factors or evidence be considered when setting a minimum unit price for alcohol? Please select one option.

Yes

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

There is historical evidence that prohibitions of alcohol will lead to the market going underground. A minimum unit for all alcohol will impact more on responsible drinkers rather than the intended audience who will revert to acquiring their alcohol from non duty paid sources.

Score

0

Q11. The government wishes to maintain the effectiveness of minimum unit pricing and is therefore proposing to adjust the minimum unit price level over time. 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

Score

0

Q12. 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

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

The majority of the public .. Responsible drinkers.

Score

0

Page Score

0

## **Page 4: A ban on multi-buy promotions in the off-trade**

Q13. The government is consulting on introducing a ban on multi-buy promotions in the off-trade (e.g. shops and off-licences) as part of its wider strategy to reduce excessive alcohol consumption, and alongside the introduction of a minimum unit price. A ban on multi-buy promotions would therefore not apply to pubs, clubs, bars or restaurants. The term 'multi-buy promotions' refers to alcohol promotions that offer a discount for buying multiple items. 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. As well as being part of a wider strategy to reduce consumption and tackle irresponsible alcohol sales, a ban on multi-buy promotions would also contribute to the government's aim of encouraging people to be aware of how much they drink and the risks of excessive drinking, so that they can make informed choices. The aim of this

consultation is to assess support for such a ban and contribute to our understanding of the impact a ban on multi-buy promotions may have. The types of promotion it is proposed that a ban would include, are: two for the price of one, three for the price of two, buy one get one free, buy six and get 20 per cent off, 24 cans of lager costing less than 24 times the cost of a single 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, 3 for £10 where each bottle costs more than £3.33. More information is available in the full consultation document and the impact assessment. Do you want to answer questions on a ban on multi-buy promotions in the off-trade? Please select one option.

No

Score

0

Page Score

0

## Page 5: A ban on multi-buy promotions in the off-trade

Q14. Do you think there should be a ban on multi-buy promotions involving alcohol in the off-trade? Please select one option.

*No Response*

Score

0

Q15. Are there any further offers which should be included in a ban on multi-buy promotions? Please select one option.

*No Response*

Score

0

Q16. Should other factors or evidence be taken into account when considering a ban on multi-buy promotions? Please select one option.

*No Response*

Score

0

Q17. 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.

*No Response*

Score

0

Page Score

0

## Page 6: Reviewing the mandatory licensing conditions

Q18. 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 alcohol 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. The government has also committed to consult on whether these mandatory licensing conditions should, where relevant, apply to both the on- and off-trade. This consultation forms part of that review, and will contribute to the government's understanding of how these mandatory conditions are perceived. The five mandatory licensing conditions currently set out in regulations in relation to the supply of alcohol are: a ban on irresponsible promotions a ban on dispensing alcohol by one person directly into the mouth of another a requirement to provide free tap water on request to customers a requirement to have an age verification policy to prevent the sale of alcohol to persons under 18 years of age, and a requirement to make available to customers small measures such as half pints or beer or cider or 125ml glasses of wine More information is available in the full consultation document. An explanation of each of these terms can be found on page 20 of the consultation document, in the glossary at the end. Do you want to answer questions on reviewing the mandatory licensing conditions? Please select one option.

Yes

Score

0

Page Score

0

## Page 7: Reviewing the mandatory licensing conditions

Q19. Do you think each of the mandatory licensing conditions is effective in promoting the licensing objectives? For more information on the licensing objectives please see the glossary at the end of the full consultation document. Please select one option (Yes, No, Don't know) from each drop down menu.

	Prevention of crime and disorder	Public safety	Prevention of public nuisance	Protection of children from harm
<b>Irresponsible promotions</b>	Yes	Yes	Yes	Yes
<b>Dispensing alcohol directly into the mouth</b>	No	No	No	No
<b>Mandatory provision of</b>	Yes	Yes	Yes	Yes

<b>free tap water</b>				
<b>Age verification policy</b>	Yes	No	Yes	Yes
<b>Mandatory provision of small measures</b>	No	No	No	No

Score

0

Q20. Do you think that the mandatory licensing conditions do enough to target irresponsible promotions in pubs and clubs? Please select one option.

No

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

The definition of an irresponsible promotion is unclear. Licensing Authorities are unwilling to commit to a specific price that clearly advises the Trade locally due to fear of an expensive legal defence of their decision if challenged. Consequently, the Trade are offered no clear guidelines to work to and open to interpretation and enforcement is patchy. This is evidenced by the low number of prosecutions, if any.

Score

0

Q21. Are there other issues related to the licensing objectives which could be tackled through a mandatory licensing condition? Please select one option.

Yes

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

1) All risk assessments need to be in a written format that is available on the premises for staff and to be produced to responsible authorities on request  
2) Under 18 events - Risk assessments for the consideration of holding such 'alcohol free' events need to be submitted with appropriate prior notice to the Responsible authorities for consultation. This will reduce any risk or threat to other premises in the area; posed by other premises in the area and reduce the risk of any child exploitation.

Score

0

Q22. Do you think that 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.

No

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

Off Trade has an equal impact on community safety / crime and disorder

issues, to the point our experience has been that it is not uncommon to locate a non-compliant off-licence premise within a mile of a hotspot for anti-social behaviour. It has become the norm now that any Grocery store will seek to have an off-licence facility.

Score

0

Page Score

0

## **Page 8: Health as a licensing objective for cumulative impact policies**

Q23. We want to ensure that licensing authorities are able to take alcohol-related health harms into consideration when making decisions about cumulative impact policies (CIPs) which can be used to manage problems linked to the density of premises in specific areas. 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. We are proposing 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. We expect that those areas with the highest levels of alcohol-related health harm, or fast rising levels of harm from alcohol, will be most likely to use this power. It 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. More information is available in the full consultation document and impact assessment. Do you want to answer questions on health as a licensing objective for cumulative impact policies? Please select one option.

Yes

Score

0

Page Score

0

## **Page 9: Health as a licensing objective for cumulative impact policies**

Q24. 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):

Evidence from Alcohol profiles for the area; Admission data from the local hospital Accident and Emergency department ; Data from Ambulance

pickups

Q25. 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.

No

Score

0

Q26. 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 your answer in the box below, providing evidence to support your response (keeping your views to a maximum of 200 words):

Licensing Committees could make a more informed decision of the consequences of the local alcohol consumption profile / trends.

Page Score

0

## Page 10: Freeing up responsible businesses

Q27. The government has committed to consult on giving licensing authorities greater freedom to take decisions that reflect the needs of their local community. Following the government's Red Tape Challenge in 2011, three areas of reform were specified: alcohol licensing for certain types of premises providing minimal alcohol sales, temporary event notices (TENs) and the licensing of late night refreshment. This section asks for views on these proposals and suggests further ways to reduce burdens on business. The proposals set out here can be seen alongside work undertaken by the Department for Culture, Media and Sport to remove unnecessary red tape from regulated entertainment. More information on each of these areas for reform is available in the full consultation document. There are five subjects covered in this section. They are: ancillary sales of alcohol occasional provision of licensable activities at community events an extension of the temporary event notice limit at individual premises late night refreshment, and further proposals to reduce burdens on business Do you want to answer questions on freeing up responsible businesses? Please select one option.

Yes

Score

0

Page Score

0

## Page 11: Freeing up responsible businesses

Q28. Ancillary sales of alcohol For many businesses, the sale of alcohol is only a small part of, or incidental to, their wider activities, and occurs alongside the provision of another product or service (which this consultation refers to as an 'ancillary sale'). For example, a guesthouse might wish to provide wine to its guests with an evening meal or a complimentary bottle of wine in a guest's room, while a hairdresser might

wish to offer clients a glass of wine. 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
<b>The provision should be limited to a specific list of certain types of business and the kinds of sales they make</b>	X		
<b>The provision should be available to all businesses providing they meet certain qualification criteria to be an ancillary seller</b>		X	
<b>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 the above options</b>		X	

Score

0

Q29. If special provisions 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.

	Yes	No	Don't know
<b>Accommodation providers, providing alcohol alongside accommodation as part of the contract</b>	X		
<b>Hair and beauty salons, providing alcohol alongside a hair or beauty treatment</b>		X	
<b>Florists, providing alcohol alongside the purchase of flowers</b>		X	
<b>Cultural organisations, such as theatres, cinemas and museums, providing alcohol alongside cultural events as part of the entry ticket</b>		X	
<b>Regular charitable events, providing alcohol as part of the wider occasion</b>		X	

Score

0

Q30. 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 suggestions in the box below, keeping your views to a maximum of 200 words:

Limitations on the amounts sold so the special provision does not become their main incentive. All options can be subject to abuse by irresponsible traders which will impact on the local communities. In our opinion, all sellers of alcohol should apply through the current process and state their intentions to support the Licensing objectives.

Q31. 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. Alternatively, a second option is to broaden the definition of 'ancillary sales' to include all businesses (and/or not for profit activities) through the use of a general set of qualification criteria, for example, to the effect that: alcohol must be sold or supplied as a small part or proportion of a sales transaction or contract for a wider service, and the amount of alcohol that could be supplied as part of that contract cannot exceed a prescribed amount. Do you think that the qualification criteria proposed meet this aim?

No

***Please use the space below to provide further comments (keeping your views to a maximum of 200 words):***

The definition of 'small' needs clearer guidance. How would this be enforced?

Score

0

Q32. 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
<b>Allow premises making ancillary sales to request in their premises licence application that the requirement for a personal licence holder be removed</b>		X	
<b>Introduce a new, light-touch form of authorisation for premises making ancillary sales - an ASN but retaining the need for a personal licence holder</b>		X	
<b>Introduce a new, light touch form of authorisation for premises making ancillary sales - an ASN - with no requirement for a personal licence holder</b>		X	

Score

0

Q33. Do you think these proposals would impact adversely on one or more of the licensing objectives? Please select one option.

	Yes	No	Don't know
<b>Allow premises making ancillary sales to request in their premises licence application that the requirement for a personal licence holder be removed</b>		X	
<b>Introduce a new, light-touch form of authorisation for premises making ancillary sales - an ASN but retaining the need for a personal licence holder</b>	X		
<b>Introduce a new, light touch form of authorisation for premises making ancillary sales - an ASN - with no requirement for a personal licence holder</b>	X		

Score

0

Q34. 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 response to a maximum of 200 words:

We would not support any of these proposals. How much evidence needs to be presented regarding the impact of irresponsible selling of alcohol? The responsibility of selling alcohol or the impact on local communities should not be taken for granted. Sufficient measures need to be put in place to prevent any potential abuse by any sellers that will impact on local community safety issues. From a practitioners point of view, new processes for modifying and challenging applications would need to be considered.

Page Score

0

## Page 12: Freeing up responsible businesses

Q35. 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.

No

Score

0

Q36. 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
<b>Reduce the burden</b>	X		

Increase the burden		X	
---------------------	--	---	--

Score

0

Page Score

0

## Page 13: Freeing up responsible businesses

Q37. Should the number of TENs which can be given in respect of individual premises be increased? Please select one option.

No

Score

0

Q38. If you answered yes, please select one option to indicate which you would prefer. Please select one option.

*No Response*

Score

0

Page Score

0

## Page 14: Freeing up responsible businesses

Q39. 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
<b>Determining that premises in certain areas are exempt</b>		X	
<b>Determining that certain premises types are exempt in their local area</b>	X		

Score

0

Q40. 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

Score

0

Q41. 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).

None

Page Score

0

## Page 15: Freeing up responsible businesses

Q42. Do you agree with each of the following proposals? Please select one option in each row.

	Yes	No	Don't know
<b>Remove requirements to advertise licensing applications in local newspapers</b>	X		
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs for the on and off-trade</b>		X	
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs, but only in respect of overnight accommodation - lodges</b>	X		
<b>Remove or simplify requirements to renew personal licences under the 2003 Act</b>		X	

Score

0

Q43. 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
<b>Remove requirements to advertise licensing applications in local newspapers</b>	X		
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs for the on and off-trade</b>		X	
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs, but only in respect of overnight accommodation - lodges</b>	X		
<b>Remove or simplify requirements to renew personal licences under the 2003 Act</b>		X	

Score

0

Q44. 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.

	Yes	No	Don't know

<b>Remove requirements to advertise licensing applications in local newspapers</b>		X	
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs for the on and off-trade</b>	X		
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs, but only in respect of overnight accommodation - lodges</b>		X	
<b>Remove or simplify requirements to renew personal licences under the 2003 Act</b>	X		

Score

0

Q45. 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 keep your views to a maximum of 200 words.)

(1) Provide the power to Licensing authorities to suspend Personal licences when clear evidence of repeated abuse is presented to a Licensing Committee.

(2) Develop a national Personal licence database.

(3) Define a 'Community enterprise' and 'community event' for Alcohol licensing purposes

(4) Provide the power to close an unlicensed event that is offering unlicensable activities but unable to provide evidence of sales of alcohol within the previous 24 hours.

Page Score

0

## Page 16: Impact assessments

Q46. Impact assessments for the proposals in this consultation have been published alongside the full consultation document. 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
<b>Minimum unit pricing</b>	X		
<b>Multi-buy promotions</b>	X		
<b>Health as a licensing objective for cumulative</b>			X

<b>impact</b>			
<b>Ancillary sales of alcohol</b>			X
<b>Temporary event notices</b>			X
<b>Late night refreshment</b>			X
<b>Removing the duty to advertise licence applications in a local newspaper</b>			X
<b>Sales of alcohol at motorway service stations</b>		X	
<b>Personal licences</b>		X	

Score

0

Q47. Do you have any comments on the methodologies or assumptions used in the impact assessments? If yes, please specify in the box below, clearly referencing the impact assessment and page to which you refer (keeping your views to a maximum of 400 words).

**No Response**

Page Score

0

## Scoring Summary

<b>Pages</b>	<b>Total</b>
1. About you	0
2. A minimum unit price for alcohol	0
3. A minimum unit price for alcohol	0
4. A ban on multi-buy promotions in the off-trade	0
5. A ban on multi-buy promotions in the off-trade	0
6. Reviewing the mandatory licensing conditions	0
7. Reviewing the mandatory licensing conditions	0
8. Health as a licensing objective for cumulative impact policies	0

9. Health as a licensing objective for cumulative impact policies	0
10. Freeing up responsible businesses	0
11. Freeing up responsible businesses	0
12. Freeing up responsible businesses	0
13. Freeing up responsible businesses	0
14. Freeing up responsible businesses	0
15. Freeing up responsible businesses	0
16. Impact assessments	0
<b>Total Survey Score:</b>	<b>0</b>

# Alcohol strategy consultation

---

User Details - 5452467

**Date Started:** 04/02/2013 09:18:33    **Date Ended:** 04/02/2013 10:56:01

**Time taken:** 1 hr, 37 mins, 28 secs    **IP Address:** n/a

**Unique ID:** n/a

---

## Page 1: About you

Q1. Please select if you would like your response or personal details to be treated as confidential.

*No Response*

Score

0

Q2. Which of the following best describes you or the professional interest you represent? Please select one option from the menu below.

Local government (other)

***Please specify which organisation, licensing authority or police force you represent in the box below:***

West Sussex County Council

Score

0

Q3. If you are responding on behalf of an organisation or interest group, please write in the box below the number of members in your group or organisation.

*No Response*

Q4. How did you obtain the views of your members? Please explain in the box below keeping your response to a maximum of 100 words.

*No Response*

Q5. Please indicate in which region you or your organisation is based.

Please select one option from the menu below.

South East England

Score

0

Q6. If you are responding as a member of the public, what is your gender? Please select one option.

*No Response*

Score

0

Q7. If you are responding as a member of the public, what is your age? Please select one option.

*No Response*

Score

0

Page Score

0

## Page 2: A minimum unit price for alcohol

Q8. In the alcohol strategy, the government committed to introducing a minimum unit price for alcohol in England and Wales. This consultation will contribute to the debate on the most appropriate price per unit and the mechanism by which, once set, minimum unit pricing would remain effective. It is also an opportunity for interested parties to raise other issues around minimum unit pricing. The purpose of minimum unit pricing is to reduce alcohol consumption, particularly by the most hazardous and harmful drinkers who tend to show a preference for the cheapest alcohol products. By doing so the government estimates there will be a reduction in the associated crime and health harms, especially the numbers of hospital admissions, alcohol-related deaths and alcohol-related crimes. Minimum unit pricing is not intended disproportionately to affect responsible drinkers or particular social groups but to reduce the availability of alcohol sold at very low or heavily discounted prices. More information (including the definitions of hazardous and harmful drinkers) is available in the full consultation document and the impact assessment. Do you want to answer questions on minimum unit pricing? Please select one option.

Yes

Score

0

Page Score

0

## Page 3: A minimum unit price for alcohol

Q9. The impact of minimum unit pricing will depend on the price per unit of alcohol. The government wants to ensure that the chosen price level is targeted and proportionate, whilst achieving a significant reduction of harm. The government is therefore consulting on the introduction of a recommended minimum unit price of 45p. The government estimates a reduction in consumption across all product types of 3.3 per cent, a reduction in crime of 5,240 per year, a reduction in 24,600 alcohol-related hospital admissions and 714 fewer deaths per year after ten years. Do you agree that this minimum unit price level would achieve these aims? Please select one option.

Yes

Score

0

Q10. Should other factors or evidence be considered when setting a minimum unit price for alcohol? Please select one option.

Don't know

Score

0

Q11. The government wishes to maintain the effectiveness of minimum unit pricing and is therefore proposing to adjust the minimum unit price level over time. 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 automatically be updated in line with inflation each year

Score

0

Q12. 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

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

licensed premises, small independent sellers with off-licenses. Although this shouldn't stand in way of rises, as the wider benefit outweighs this.

Score

0

Page Score

0

## **Page 4: A ban on multi-buy promotions in the off-trade**

Q13. The government is consulting on introducing a ban on multi-buy promotions in the off-trade (e.g. shops and off-licences) as part of its wider strategy to reduce excessive alcohol consumption, and alongside the introduction of a minimum unit price. A ban on multi-buy promotions would therefore not apply to pubs, clubs, bars or restaurants. The term 'multi-buy promotions' refers to alcohol promotions that offer a discount for buying multiple items. 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. As well as being part of a wider strategy to reduce consumption and tackle irresponsible alcohol sales, a ban on multi-buy promotions would also contribute to the government's aim of encouraging people to be aware of how much they drink and the risks of excessive drinking, so that they can make informed choices. The aim of this consultation is to assess support for such a ban and contribute to our understanding of the impact a ban on multi-buy promotions may have. The types of promotion it is proposed that a ban would include, are: two for the price of one, three for the price of two, buy one get one free, buy six and get 20 per cent off, 24 cans of lager costing less than 24 times the cost of a single

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 for £10 where each bottle costs more than £3.33 More information is available in the full consultation document and the impact assessment. Do you want to answer questions on a ban on multi-buy promotions in the off-trade? Please select one option.

Yes

Score

0

Page Score

0

## Page 5: A ban on multi-buy promotions in the off-trade

Q14. Do you think there should be a ban on multi-buy promotions involving alcohol in the off-trade? Please select one option.

No

Score

0

Q15. Are there any further offers which should be included in a ban on multi-buy promotions? Please select one option.

Don't know

Score

0

Q16. Should other factors or evidence be taken into account when considering a ban on multi-buy promotions? Please select one option.

Yes

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

Would need to balance the intention to stop at risk drinkers from over consuming against rights of responsible drinkers who would also be penalised by the ban. Perhaps restrictions should be focused only on larger-scale multi-buy promotions where excessive amounts of alcohol are bought. Alternatively, restrictions on the number of multi-buys consumers could purchase?

Score

0

Q17. 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.

Don't know

Score

0

Page Score

0

## Page 6: Reviewing the mandatory licensing conditions

Q18. 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 alcohol 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. The government has also committed to consult on whether these mandatory licensing conditions should, where relevant, apply to both the on- and off-trade. This consultation forms part of that review, and will contribute to the government's understanding of how these mandatory conditions are perceived. The five mandatory licensing conditions currently set out in regulations in relation to the supply of alcohol are: a ban on irresponsible promotions, a ban on dispensing alcohol by one person directly into the mouth of another, a requirement to provide free tap water on request to customers, a requirement to have an age verification policy to prevent the sale of alcohol to persons under 18 years of age, and a requirement to make available to customers small measures such as half pints of beer or cider or 125ml glasses of wine. More information is available in the full consultation document. An explanation of each of these terms can be found on page 20 of the consultation document, in the glossary at the end. Do you want to answer questions on reviewing the mandatory licensing conditions? Please select one option.

Yes

Score

0

Page Score

0

## Page 7: Reviewing the mandatory licensing conditions

Q19. Do you think each of the mandatory licensing conditions is effective in promoting the licensing objectives? For more information on the licensing objectives please see the glossary at the end of the full consultation document. Please select one option (Yes, No, Don't know) from each drop down menu.

	Prevention of crime and disorder	Public safety	Prevention of public nuisance	Protection of children from harm
Irresponsible promotions	Yes	Yes	Yes	Yes
Dispensing	Yes	Yes	Yes	Yes

<b>alcohol directly into the mouth</b>				
<b>Mandatory provision of free tap water</b>	Yes	Yes	Yes	Yes
<b>Age verification policy</b>	Yes	Yes	Yes	Yes
<b>Mandatory provision of small measures</b>	Yes	Yes	Yes	Yes

Score

0

Q20. Do you think that the mandatory licensing conditions do enough to target irresponsible promotions in pubs and clubs? Please select one option.

No

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

restrictions in number of licensed premises in promity to each other, mandatory conditions applied to licenses to support/fund crime prevention and public health initiatives.

Score

0

Q21. Are there other issues related to the licensing objectives which could be tackled through a mandatory licensing condition? Please select one option.

Yes

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

restrictions in number of licensed premises in promity to each other, mandatory conditions applied to licenses to support/fund crime prevention and public health initiatives. Ban large scale adult-only weekends at holiday camps or impose temporary license conditions to premises on these occasions. Ensure adequate security staff and measures are implemented and all staff are trained in recognising excessive alcohol consumption and how to react if excess alcohol causes health problems to drinkers on site.

Score

0

Q22. Do you think that 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.

No

***If no, please explain why you think the current approach is not the***

**best approach (keeping your views to a maximum of 100 words):**

Should be mandatory age verification for sale of ALL alcohol regardless of off-on license. Minimum pricing AND restriction on amount of alcohol purchased in off-license imperative.

Score

0

Page Score

0

## **Page 8: Health as a licensing objective for cumulative impact policies**

Q23. We want to ensure that licensing authorities are able to take alcohol-related health harms into consideration when making decisions about cumulative impact policies (CIPs) which can be used to manage problems linked to the density of premises in specific areas. 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. We are proposing 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. We expect that those areas with the highest levels of alcohol-related health harm, or fast rising levels of harm from alcohol, will be most likely to use this power. It 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. More information is available in the full consultation document and impact assessment. Do you want to answer questions on health as a licensing objective for cumulative impact policies? Please select one option.

Yes

Score

0

Page Score

0

## **Page 9: Health as a licensing objective for cumulative impact policies**

Q24. 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):

Alcohol related attendance at A&E

Alcohol related hospital admissions

Alcohol related arrests

Testimonial from officers/public health specialists

Q25. 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.

Don't know

Score

0

Q26. 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 your answer in the box below, providing evidence to support your response (keeping your views to a maximum of 200 words):

Empower local authorities and public health teams to better react to licensing applications

Demonstrate a need for health based data from Acute Hospital Trusts

Page Score

0

## Page 10: Freeing up responsible businesses

Q27. The government has committed to consult on giving licensing authorities greater freedom to take decisions that reflect the needs of their local community. Following the government's Red Tape Challenge in 2011, three areas of reform were specified: alcohol licensing for certain types of premises providing minimal alcohol sales, temporary event notices (TENs) and the licensing of late night refreshment. This section asks for views on these proposals and suggests further ways to reduce burdens on business. The proposals set out here can be seen alongside work undertaken by the Department for Culture, Media and Sport to remove unnecessary red tape from regulated entertainment. More information on each of these areas for reform is available in the full consultation document. There are five subjects covered in this section. They are: ancillary sales of alcohol, occasional provision of licensable activities at community events, an extension of the temporary event notice limit at individual premises, late night refreshment, and further proposals to reduce burdens on business. Do you want to answer questions on freeing up responsible businesses? Please select one option.

Yes

Score

0

Page Score

0

## Page 11: Freeing up responsible businesses

Q28. Ancillary sales of alcohol For many businesses, the sale of alcohol is only a small part of, or incidental to, their wider activities, and occurs alongside the provision of another product or service (which this consultation refers to as an 'ancillary sale'). For example, a guesthouse

might wish to provide wine to its guests with an evening meal or a complimentary bottle of wine in a guest's room, while a hairdresser might wish to offer clients a glass of wine. 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
<b>The provision should be limited to a specific list of certain types of business and the kinds of sales they make</b>			X
<b>The provision should be available to all businesses providing they meet certain qualification criteria to be an ancillary seller</b>			X
<b>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 the above options</b>	X		

Score

0

Q29. If special provisions 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.

	Yes	No	Don't know
<b>Accommodation providers, providing alcohol alongside accommodation as part of the contract</b>	X		
<b>Hair and beauty salons, providing alcohol alongside a hair or beauty treatment</b>	X		
<b>Florists, providing alcohol alongside the purchase of flowers</b>	X		
<b>Cultural organisations, such as theatres, cinemas and museums, providing alcohol alongside cultural events as part of the entry ticket</b>	X		
<b>Regular charitable events, providing alcohol as part of the wider occasion</b>	X		

Score

0

Q30. 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 suggestions in the box below, keeping your views to a maximum of 200 words:

Airports, Train Stations / Other Public Transport where alcohol is sold on-site

Late Night Refreshment Venues

Q31. 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. Alternatively, a second option is to broaden the definition of 'ancillary sales' to include all businesses (and/or not for profit activities) through the use of a general set of qualification criteria, for example, to the effect that: alcohol must be sold or supplied as a small part or proportion of a sales transaction or contract for a wider service, and the amount of alcohol that could be supplied as part of that contract cannot exceed a prescribed amount. Do you think that the qualification criteria proposed meet this aim?

Don't know

***Please use the space below to provide further comments (keeping your views to a maximum of 200 words):***

Believe the second option is a better option as will ensure all sellers of alcohol are held to account, minimising potential opportunities for regulations to be breached or 'ancillary sellers' to mis-sell

Score

0

Q32. 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
<b>Allow premises making ancillary sales to request in their premises licence application that the requirement for a personal licence holder be removed</b>		X	
<b>Introduce a new, light-touch form of authorisation for premises making ancillary sales - an ASN but retaining the need for a personal licence holder</b>	X		
<b>Introduce a new, light touch form of authorisation for premises making ancillary sales - an ASN - with no requirement for a personal licence holder</b>		X	

Score

0

Q33. Do you think these proposals would impact adversely on one or more of the licensing objectives? Please select one option.

	Yes	No	Don't know
<b>Allow premises making ancillary sales to request in their premises licence application that the requirement for a personal licence holder be removed</b>	X		
<b>Introduce a new, light-touch form of authorisation for premises making ancillary sales - an ASN but retaining the need for a personal licence holder</b>			X
<b>Introduce a new, light touch form of authorisation for premises making ancillary sales - an ASN - with no requirement for a personal licence holder</b>	X		

Score

0

Q34. 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 response to a maximum of 200 words:

Not sure whether lighter touch authorisation is necessarily in best interests of public health, rather symbolic of devolvement of powers from central government.

Licensing should remain restrictive to ensure only responsible license holders can supply alcohol,

Without individual licensees, there is potential for breach of license and a lack of individual accountability

Page Score

0

## Page 12: Freeing up responsible businesses

Q35. 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

Score

0

Q36. 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
--	-----	----	------------

<b>Reduce the burden</b>	X		
<b>Increase the burden</b>		X	

Score

0

Page Score

0

## Page 13: Freeing up responsible businesses

Q37. Should the number of TENs which can be given in respect of individual premises be increased? Please select one option.

No

Score

0

Q38. If you answered yes, please select one option to indicate which you would prefer. Please select one option.

*No Response*

Score

0

Page Score

0

## Page 14: Freeing up responsible businesses

Q39. 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
<b>Determining that premises in certain areas are exempt</b>	X		
<b>Determining that certain premises types are exempt in their local area</b>	X		

Score

0

Q40. 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.

No

Score

0

Q41. 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).

*No Response*

Page Score

0

## Page 15: Freeing up responsible businesses

Q42. Do you agree with each of the following proposals? Please select one option in each row.

	Yes	No	Don't know
<b>Remove requirements to advertise licensing applications in local newspapers</b>		X	
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs for the on and off-trade</b>		X	
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs, but only in respect of overnight accommodation - lodges</b>		X	
<b>Remove or simplify requirements to renew personal licences under the 2003 Act</b>		X	

Score

0

Q43. 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
<b>Remove requirements to advertise licensing applications in local newspapers</b>		X	
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs for the on and off-trade</b>		X	
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs, but only in respect of overnight accommodation - lodges</b>		X	
<b>Remove or simplify requirements to renew personal licences under the 2003 Act</b>		X	

Score

0

Q44. 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.

	Yes	No	Don't know

<b>Remove requirements to advertise licensing applications in local newspapers</b>	X		
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs for the on and off-trade</b>	X		
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs, but only in respect of overnight accommodation - lodges</b>	X		
<b>Remove or simplify requirements to renew personal licences under the 2003 Act</b>	X		

Score

0

Q45. 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 keep your views to a maximum of 200 words.)

*No Response*

Page Score

0

## Page 16: Impact assessments

Q46. Impact assessments for the proposals in this consultation have been published alongside the full consultation document. 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
<b>Minimum unit pricing</b>			X
<b>Multi-buy promotions</b>			X
<b>Health as a licensing objective for cumulative impact</b>			X
<b>Ancillary sales of alcohol</b>			X
<b>Temporary event notices</b>			X
<b>Late night refreshment</b>			X
<b>Removing the duty to advertise licence applications in a local newspaper</b>			X

<b>Sales of alcohol at motorway service stations</b>			X
<b>Personal licences</b>			X

Score

0

Q47. Do you have any comments on the methodologies or assumptions used in the impact assessments? If yes, please specify in the box below, clearly referencing the impact assessment and page to which you refer (keeping your views to a maximum of 400 words).

*No Response*

Page Score

0

## Scoring Summary

Pages	Total
1. About you	0
2. A minimum unit price for alcohol	0
3. A minimum unit price for alcohol	0
4. A ban on multi-buy promotions in the off-trade	0
5. A ban on multi-buy promotions in the off-trade	0
6. Reviewing the mandatory licensing conditions	0
7. Reviewing the mandatory licensing conditions	0
8. Health as a licensing objective for cumulative impact policies	0
9. Health as a licensing objective for cumulative impact policies	0
10. Freeing up responsible businesses	0
11. Freeing up responsible businesses	0
12. Freeing up responsible businesses	0
13. Freeing up responsible businesses	0

14. Freeing up responsible businesses	0
15. Freeing up responsible businesses	0
16. Impact assessments	0
<b>Total Survey Score:</b>	0

# Alcohol strategy consultation

User Details - 5453438

**Date Started:** 04/02/2013 10:54:47    **Date Ended:** 04/02/2013 11:04:58

**Time taken:** 10 mins, 11 secs    **IP Address:** n/a

**Unique ID:** n/a

## Page 1: About you

Q1. Please select if you would like your response or personal details to be treated as confidential.

**No Response**

Score

0

Q2. Which of the following best describes you or the professional interest you represent? Please select one option from the menu below.

Other

***Please specify which organisation, licensing authority or police force you represent in the box below:***

Gainsborough Foundation Organisation providing support to people with alcohol problems and their families

Score

0

Q3. If you are responding on behalf of an organisation or interest group, please write in the box below the number of members in your group or organisation.

7

Q4. How did you obtain the views of your members? Please explain in the box below keeping your response to a maximum of 100 words.

Team Meeting and other informal discussion

Q5. Please indicate in which region you or your organisation is based.

Please select one option from the menu below.

East of England

Score

0

Q6. If you are responding as a member of the public, what is your gender? Please select one option.

**No Response**

Score

0

Q7. If you are responding as a member of the public, what is your age?

Please select one option.

*No Response*

Score

0

Page Score

0

## Page 2: A minimum unit price for alcohol

Q8. In the alcohol strategy, the government committed to introducing a minimum unit price for alcohol in England and Wales. This consultation will contribute to the debate on the most appropriate price per unit and the mechanism by which, once set, minimum unit pricing would remain effective. It is also an opportunity for interested parties to raise other issues around minimum unit pricing. The purpose of minimum unit pricing is to reduce alcohol consumption, particularly by the most hazardous and harmful drinkers who tend to show a preference for the cheapest alcohol products. By doing so the government estimates there will be a reduction in the associated crime and health harms, especially the numbers of hospital admissions, alcohol-related deaths and alcohol-related crimes. Minimum unit pricing is not intended disproportionately to affect responsible drinkers or particular social groups but to reduce the availability of alcohol sold at very low or heavily discounted prices. More information (including the definitions of hazardous and harmful drinkers) is available in the full consultation document and the impact assessment. Do you want to answer questions on minimum unit pricing? Please select one option.

Yes

Score

0

Page Score

0

## Page 3: A minimum unit price for alcohol

Q9. The impact of minimum unit pricing will depend on the price per unit of alcohol. The government wants to ensure that the chosen price level is targeted and proportionate, whilst achieving a significant reduction of harm. The government is therefore consulting on the introduction of a recommended minimum unit price of 45p. The government estimates a reduction in consumption across all product types of 3.3 per cent, a reduction in crime of 5,240 per year, a reduction in 24,600 alcohol-related hospital admissions and 714 fewer deaths per year after ten years. Do you agree that this minimum unit price level would achieve these aims? Please select one option.

No

Score

0

Q10. Should other factors or evidence be considered when setting a minimum unit price for alcohol? Please select one option.

Yes

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

Unit price rise will not change the people who abuse alcohol. Cigarettes go up all the time but it does not have the effect of putting people off.

Score

0

Q11. The government wishes to maintain the effectiveness of minimum unit pricing and is therefore proposing to adjust the minimum unit price level over time. 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

Score

0

Q12. 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.

No

Score

0

Page Score

0

## **Page 4: A ban on multi-buy promotions in the off-trade**

Q13. The government is consulting on introducing a ban on multi-buy promotions in the off-trade (e.g. shops and off-licences) as part of its wider strategy to reduce excessive alcohol consumption, and alongside the introduction of a minimum unit price. A ban on multi-buy promotions would therefore not apply to pubs, clubs, bars or restaurants. The term 'multi-buy promotions' refers to alcohol promotions that offer a discount for buying multiple items. 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. As well as being part of a wider strategy to reduce consumption and tackle irresponsible alcohol sales, a ban on multi-buy promotions would also contribute to the government's aim of encouraging people to be aware of how much they drink and the risks of excessive drinking, so that they can make informed choices. The aim of this consultation is to assess support for such a ban and contribute to our understanding of the impact a ban on multi-buy promotions may have. The types of promotion it is proposed that a ban would include, are: two for the price of one, three for the price of two, buy one get one free, buy six and get 20 per cent off, 24 cans of lager costing less than 24 times the cost of a single

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 for £10 where each bottle costs more than £3.33 More information is available in the full consultation document and the impact assessment. Do you want to answer questions on a ban on multi-buy promotions in the off-trade? Please select one option.

Yes

Score

0

Page Score

0

## Page 5: A ban on multi-buy promotions in the off-trade

Q14. Do you think there should be a ban on multi-buy promotions involving alcohol in the off-trade? Please select one option.

No

Score

0

Q15. Are there any further offers which should be included in a ban on multi-buy promotions? Please select one option.

No

Score

0

Q16. Should other factors or evidence be taken into account when considering a ban on multi-buy promotions? Please select one option.

Yes

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

We do not believe any form of price setting will change the habits of those who abuse alcohol

Score

0

Q17. 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.

No

Score

0

Page Score

0

## Page 6: Reviewing the mandatory licensing conditions

Q18. 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 alcohol 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. The government has also committed to consult on whether these mandatory licensing conditions should, where relevant, apply to both the on- and off-trade. This consultation forms part of that review, and will contribute to the government's understanding of how these mandatory conditions are perceived. The five mandatory licensing conditions currently set out in regulations in relation to the supply of alcohol are: a ban on irresponsible promotions, a ban on dispensing alcohol by one person directly into the mouth of another, a requirement to provide free tap water on request to customers, a requirement to have an age verification policy to prevent the sale of alcohol to persons under 18 years of age, and a requirement to make available to customers small measures such as half pints or beer or cider or 125ml glasses of wine. More information is available in the full consultation document. An explanation of each of these terms can be found on page 20 of the consultation document, in the glossary at the end. Do you want to answer questions on reviewing the mandatory licensing conditions? Please select one option.

No

Score

0

Page Score

0

## Page 7: Reviewing the mandatory licensing conditions

Q19. Do you think each of the mandatory licensing conditions is effective in promoting the licensing objectives? For more information on the licensing objectives please see the glossary at the end of the full consultation document. Please select one option (Yes, No, Don't know) from each drop down menu.

*No Response*

Score

0

Q20. Do you think that the mandatory licensing conditions do enough to target irresponsible promotions in pubs and clubs? Please select one option.

*No Response*

Score

0

Q21. Are there other issues related to the licensing objectives which could be tackled through a mandatory licensing condition? Please select one option.

*No Response*

Score

0

Q22. Do you think that 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.

**No Response**

Score

0

Page Score

0

## **Page 8: Health as a licensing objective for cumulative impact policies**

Q23. We want to ensure that licensing authorities are able to take alcohol-related health harms into consideration when making decisions about cumulative impact policies (CIPs) which can be used to manage problems linked to the density of premises in specific areas. 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. We are proposing 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. We expect that those areas with the highest levels of alcohol-related health harm, or fast rising levels of harm from alcohol, will be most likely to use this power. It 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. More information is available in the full consultation document and impact assessment. Do you want to answer questions on health as a licensing objective for cumulative impact policies? Please select one option.

Yes

Score

0

Page Score

0

## **Page 9: Health as a licensing objective for cumulative impact policies**

Q24. 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):

NHS SUS date

Local council expenditure relating to crime, social deprivation, housing, social services, probation figures

Q25. 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.

Don't know

Score

0

Q26. 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 your answer in the box below, providing evidence to support your response (keeping your views to a maximum of 200 words):

It would be more likely to get a real and accurate picture and figures of the problems

Page Score

0

## Page 10: Freeing up responsible businesses

Q27. The government has committed to consult on giving licensing authorities greater freedom to take decisions that reflect the needs of their local community. Following the government's Red Tape Challenge in 2011, three areas of reform were specified: alcohol licensing for certain types of premises providing minimal alcohol sales, temporary event notices (TENs) and the licensing of late night refreshment. This section asks for views on these proposals and suggests further ways to reduce burdens on business. The proposals set out here can be seen alongside work undertaken by the Department for Culture, Media and Sport to remove unnecessary red tape from regulated entertainment. More information on each of these areas for reform is available in the full consultation document. There are five subjects covered in this section. They are: ancillary sales of alcohol occasional provision of licensable activities at community events an extension of the temporary event notice limit at individual premises late night refreshment, and further proposals to reduce burdens on business Do you want to answer questions on freeing up responsible businesses? Please select one option.

No

Score

0

Page Score

0

## Page 11: Freeing up responsible businesses

Q28. Ancillary sales of alcohol For many businesses, the sale of alcohol is only a small part of, or incidental to, their wider activities, and occurs alongside the provision of another product or service (which this consultation refers to as an 'ancillary sale'). For example, a guesthouse might wish to provide wine to its guests with an evening meal or a

complimentary bottle of wine in a guest's room, while a hairdresser might wish to offer clients a glass of wine. 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.

*No Response*

Score

0

Q29. If special provisions 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.

*No Response*

Score

0

Q30. 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 suggestions in the box below, keeping your views to a maximum of 200 words:

*No Response*

Q31. 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. Alternatively, a second option is to broaden the definition of 'ancillary sales' to include all businesses (and/or not for profit activities) through the use of a general set of qualification criteria, for example, to the effect that: alcohol must be sold or supplied as a small part or proportion of a sales transaction or contract for a wider service, and the amount of alcohol that could be supplied as part of that contract cannot exceed a prescribed amount. Do you think that the qualification criteria proposed meet this aim?

*No Response*

Score

0

Q32. Do you think that these proposals would significantly reduce the burdens on ancillary sellers? Please select one option in each row.

*No Response*

Score

0

Q33. Do you think these proposals would impact adversely on one or more of the licensing objectives? Please select one option.

*No Response*

Score

0

Q34. 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 response to a maximum of 200 words:

*No Response*

Page Score

0

## Page 12: Freeing up responsible businesses

Q35. 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.

*No Response*

Score

0

Q36. What impact do you think a locally determined notification would have on organisers of community events? Please select one option in each row.

*No Response*

Score

0

Page Score

0

## Page 13: Freeing up responsible businesses

Q37. Should the number of TENs which can be given in respect of individual premises be increased? Please select one option.

*No Response*

Score

0

Q38. If you answered yes, please select one option to indicate which you would prefer. Please select one option.

*No Response*

Score

0

Page Score

0

## Page 14: Freeing up responsible businesses

Q39. 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.

*No Response*

Score

0

Q40. 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.

*No Response*

Score

0

Q41. 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).

*No Response*

Page Score

0

## Page 15: Freeing up responsible businesses

Q42. Do you agree with each of the following proposals? Please select one option in each row.

*No Response*

Score

0

Q43. Do you think that each of the following would reduce the overall burdens on business? Please select one option in each row.

*No Response*

Score

0

Q44. 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.

*No Response*

Score

0

Q45. 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 keep your views to a maximum of 200 words.)

*No Response*

Page Score

0

## Page 16: Impact assessments

Q46. Impact assessments for the proposals in this consultation have been published alongside the full consultation document. 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
Minimum unit pricing	X		
Multi-buy promotions	X		

<b>Health as a licensing objective for cumulative impact</b>		X	
<b>Ancillary sales of alcohol</b>	X		
<b>Temporary event notices</b>	X		
<b>Late night refreshment</b>	X		
<b>Removing the duty to advertise licence applications in a local newspaper</b>	X		
<b>Sales of alcohol at motorway service stations</b>	X		
<b>Personal licences</b>	X		

Score

0

Q47. Do you have any comments on the methodologies or assumptions used in the impact assessments? If yes, please specify in the box below, clearly referencing the impact assessment and page to which you refer (keeping your views to a maximum of 400 words).

We believe that the problem is becoming increasingly worse and services are being increasingly cut. The money available to treat people with alcohol problems MUST reflect the level of the problem and be scaled up appropriately not cut.

Page Score

0

## Scoring Summary

<b>Pages</b>	<b>Total</b>
1. About you	0
2. A minimum unit price for alcohol	0
3. A minimum unit price for alcohol	0
4. A ban on multi-buy promotions in the off-trade	0
5. A ban on multi-buy promotions in the off-trade	0
6. Reviewing the mandatory licensing conditions	0
7. Reviewing the mandatory licensing	0

conditions	
8. Health as a licensing objective for cumulative impact policies	0
9. Health as a licensing objective for cumulative impact policies	0
10. Freeing up responsible businesses	0
11. Freeing up responsible businesses	0
12. Freeing up responsible businesses	0
13. Freeing up responsible businesses	0
14. Freeing up responsible businesses	0
15. Freeing up responsible businesses	0
16. Impact assessments	0
<b>Total Survey Score:</b>	<b>0</b>

# Alcohol strategy consultation

User Details - 5453555

**Date Started:** 04/02/2013 11:03:46    **Date Ended:** 04/02/2013 11:14:20

**Time taken:** 10 mins, 34 secs    **IP Address:** n/a

**Unique ID:** n/a

## Page 1: About you

Q1. Please select if you would like your response or personal details to be treated as confidential.

*No Response*

**Please provide your reasons in the box below:**

great harm done and pricing is the most effective way to limit excessive consumption of high strength alcohol

Score

0

Q2. Which of the following best describes you or the professional interest you represent? Please select one option from the menu below.

*No Response*

Score

0

Q3. If you are responding on behalf of an organisation or interest group, please write in the box below the number of members in your group or organisation.

*No Response*

Q4. How did you obtain the views of your members? Please explain in the box below keeping your response to a maximum of 100 words.

*No Response*

Q5. Please indicate in which region you or your organisation is based. Please select one option from the menu below.

*No Response*

Score

0

Q6. If you are responding as a member of the public, what is your gender? Please select one option.

Male

Score

0

Q7. If you are responding as a member of the public, what is your age? Please select one option.

35-54

Score

0

Page Score

0

## Page 2: A minimum unit price for alcohol

Q8. In the alcohol strategy, the government committed to introducing a minimum unit price for alcohol in England and Wales. This consultation will contribute to the debate on the most appropriate price per unit and the mechanism by which, once set, minimum unit pricing would remain effective. It is also an opportunity for interested parties to raise other issues around minimum unit pricing. The purpose of minimum unit pricing is to reduce alcohol consumption, particularly by the most hazardous and harmful drinkers who tend to show a preference for the cheapest alcohol products. By doing so the government estimates there will be a reduction in the associated crime and health harms, especially the numbers of hospital admissions, alcohol-related deaths and alcohol-related crimes. Minimum unit pricing is not intended disproportionately to affect responsible drinkers or particular social groups but to reduce the availability of alcohol sold at very low or heavily discounted prices. More information (including the definitions of hazardous and harmful drinkers) is available in the full consultation document and the impact assessment. Do you want to answer questions on minimum unit pricing? Please select one option.

Yes

Score

0

Page Score

0

## Page 3: A minimum unit price for alcohol

Q9. The impact of minimum unit pricing will depend on the price per unit of alcohol. The government wants to ensure that the chosen price level is targeted and proportionate, whilst achieving a significant reduction of harm. The government is therefore consulting on the introduction of a recommended minimum unit price of 45p. The government estimates a reduction in consumption across all product types of 3.3 per cent, a reduction in crime of 5,240 per year, a reduction in 24,600 alcohol-related hospital admissions and 714 fewer deaths per year after ten years. Do you agree that this minimum unit price level would achieve these aims? Please select one option.

Don't know

Score

0

Q10. Should other factors or evidence be considered when setting a minimum unit price for alcohol? Please select one option.

No

Score

0

Q11. The government wishes to maintain the effectiveness of minimum unit pricing and is therefore proposing to adjust the minimum unit price level over time. 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

Score

0

Q12. 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.

No

Score

0

Page Score

0

## Page 4: A ban on multi-buy promotions in the off-trade

Q13. The government is consulting on introducing a ban on multi-buy promotions in the off-trade (e.g. shops and off-licences) as part of its wider strategy to reduce excessive alcohol consumption, and alongside the introduction of a minimum unit price. A ban on multi-buy promotions would therefore not apply to pubs, clubs, bars or restaurants. The term 'multi-buy promotions' refers to alcohol promotions that offer a discount for buying multiple items. 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. As well as being part of a wider strategy to reduce consumption and tackle irresponsible alcohol sales, a ban on multi-buy promotions would also contribute to the government's aim of encouraging people to be aware of how much they drink and the risks of excessive drinking, so that they can make informed choices. The aim of this consultation is to assess support for such a ban and contribute to our understanding of the impact a ban on multi-buy promotions may have. The types of promotion it is proposed that a ban would include, are: two for the price of one, three for the price of two, buy one get one free, buy six and get 20 per cent off, 24 cans of lager costing less than 24 times the cost of a single 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, 3 for £10 where each bottle costs more than £3.33. More information is available in the full consultation document and the impact assessment. Do you want to answer questions on a ban on multi-buy promotions in the off-trade? Please select one option.

Yes

Score

0

Page Score

0

## Page 5: A ban on multi-buy promotions in the off-trade

Q14. Do you think there should be a ban on multi-buy promotions involving alcohol in the off-trade? Please select one option.

Yes

Score

0

Q15. Are there any further offers which should be included in a ban on multi-buy promotions? Please select one option.

Don't know

Score

0

Q16. Should other factors or evidence be taken into account when considering a ban on multi-buy promotions? Please select one option.

No

Score

0

Q17. 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.

No

Score

0

Page Score

0

## Page 6: Reviewing the mandatory licensing conditions

Q18. 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 alcohol 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. The government has also committed to consult on whether these mandatory licensing conditions should, where relevant, apply to both the on- and off-trade. This consultation forms part of that review, and will contribute to the government's understanding of how these mandatory conditions are perceived. The five mandatory licensing conditions currently set out in regulations in relation to the supply of alcohol are: a ban on irresponsible

promotions a ban on dispensing alcohol by one person directly into the mouth of another a requirement to provide free tap water on request to customers a requirement to have an age verification policy to prevent the sale of alcohol to persons under 18 years of age, and a requirement to make available to customers small measures such as half pints or beer or cider or 125ml glasses of wine More information is available in the full consultation document. An explanation of each of these terms can be found on page 20 of the consultation document, in the glossary at the end. Do you want to answer questions on reviewing the mandatory licensing conditions? Please select one option.

Yes

Score

0

Page Score

0

## Page 7: Reviewing the mandatory licensing conditions

Q19. Do you think each of the mandatory licensing conditions is effective in promoting the licensing objectives? For more information on the licensing objectives please see the glossary at the end of the full consultation document. Please select one option (Yes, No, Don't know) from each drop down menu.

	Prevention of crime and disorder	Public safety	Prevention of public nuisance	Protection of children from harm
<b>Irresponsible promotions</b>	Yes	Yes	Yes	Yes
<b>Dispensing alcohol directly into the mouth</b>	Yes	Don't know	Don't know	Don't know
<b>Mandatory provision of free tap water</b>	Yes	Yes	Yes	Yes
<b>Age verification policy</b>	Yes	Yes	Yes	Yes
<b>Mandatory provision of small measures</b>	Yes	Yes	Yes	Yes

Score

0

Q20. Do you think that the mandatory licensing conditions do enough to target irresponsible promotions in pubs and clubs? Please select one option.

Don't know

Score

0

Q21. Are there other issues related to the licensing objectives which could be tackled through a mandatory licensing condition? Please select one option.

Don't know

Score

0

Q22. Do you think that 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.

Don't know

Score

0

Page Score

0

## Page 8: Health as a licensing objective for cumulative impact policies

Q23. We want to ensure that licensing authorities are able to take alcohol-related health harms into consideration when making decisions about cumulative impact policies (CIPs) which can be used to manage problems linked to the density of premises in specific areas. 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. We are proposing 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. We expect that those areas with the highest levels of alcohol-related health harm, or fast rising levels of harm from alcohol, will be most likely to use this power. It 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. More information is available in the full consultation document and impact assessment. Do you want to answer questions on health as a licensing objective for cumulative impact policies? Please select one option.

Yes

Score

0

Page Score

0

## Page 9: Health as a licensing objective for cumulative impact policies

Q24. 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):

*No Response*

Q25. 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.

*No Response*

Score

0

Q26. 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 your answer in the box below, providing evidence to support your response (keeping your views to a maximum of 200 words):

*No Response*

Page Score

0

## Page 10: Freeing up responsible businesses

Q27. The government has committed to consult on giving licensing authorities greater freedom to take decisions that reflect the needs of their local community. Following the government's Red Tape Challenge in 2011, three areas of reform were specified: alcohol licensing for certain types of premises providing minimal alcohol sales, temporary event notices (TENs) and the licensing of late night refreshment. This section asks for views on these proposals and suggests further ways to reduce burdens on business. The proposals set out here can be seen alongside work undertaken by the Department for Culture, Media and Sport to remove unnecessary red tape from regulated entertainment. More information on each of these areas for reform is available in the full consultation document. There are five subjects covered in this section. They are: ancillary sales of alcohol occasional provision of licensable activities at community events an extension of the temporary event notice limit at individual premises late night refreshment, and further proposals to reduce burdens on business Do you want to answer questions on freeing up responsible businesses? Please select one option.

No

Score

0

Page Score

0

## Page 11: Freeing up responsible businesses

Q28. Ancillary sales of alcohol For many businesses, the sale of alcohol is only a small part of, or incidental to, their wider activities, and occurs alongside the provision of another product or service (which this consultation refers to as an 'ancillary sale'). For example, a guesthouse might wish to provide wine to its guests with an evening meal or a complimentary bottle of wine in a guest's room, while a hairdresser might wish to offer clients a glass of wine. 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.

*No Response*

Score

0

Q29. If special provisions 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.

*No Response*

Score

0

Q30. 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 suggestions in the box below, keeping your views to a maximum of 200 words:

*No Response*

Q31. 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. Alternatively, a second option is to broaden the definition of 'ancillary sales' to include all businesses (and/or not for profit activities) through the use of a general set of qualification criteria, for example, to the effect that: alcohol must be sold or supplied as a small part or proportion of a sales transaction or contract for a wider service, and the amount of alcohol that could be supplied as part of that contract cannot exceed a prescribed amount Do you think that the qualification criteria proposed meet this aim?

*No Response*

Score

0

Q32. Do you think that these proposals would significantly reduce the burdens on ancillary sellers? Please select one option in each row.

*No Response*

Score

0

Q33. Do you think these proposals would impact adversely on one or more of the licensing objectives? Please select one option.

*No Response*

Score

0

Q34. 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 response to a maximum of 200 words:

*No Response*

Page Score

0

## Page 12: Freeing up responsible businesses

Q35. 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.

*No Response*

Score

0

Q36. What impact do you think a locally determined notification would have on organisers of community events? Please select one option in each row.

*No Response*

Score

0

Page Score

0

## Page 13: Freeing up responsible businesses

Q37. Should the number of TENs which can be given in respect of individual premises be increased? Please select one option.

*No Response*

Score

0

Q38. If you answered yes, please select one option to indicate which you would prefer. Please select one option.

*No Response*

Score

0

Page Score

0

## Page 14: Freeing up responsible businesses

Q39. 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.

*No Response*

Score

0

Q40. 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.

*No Response*

Score

0

Q41. 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).

*No Response*

Page Score

0

## Page 15: Freeing up responsible businesses

Q42. Do you agree with each of the following proposals? Please select one option in each row.

*No Response*

Score

0

Q43. Do you think that each of the following would reduce the overall burdens on business? Please select one option in each row.

*No Response*

Score

0

Q44. 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.

*No Response*

Score

0

Q45. 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 keep your views to a maximum of 200 words.)

*No Response*

Page Score

0

## Page 16: Impact assessments

Q46. Impact assessments for the proposals in this consultation have been published alongside the full consultation document. 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
Minimum unit pricing	X		
Multi-buy promotions	X		
Health as a licensing objective for cumulative impact			X
Ancillary sales of alcohol			X
Temporary event notices			X
Late night refreshment			X
Removing the duty to advertise licence applications in a local newspaper			X
Sales of alcohol at motorway service stations	X		
Personal licences	X		

Score

0

Q47. Do you have any comments on the methodologies or assumptions used in the impact assessments? If yes, please specify in the box below, clearly referencing the impact assessment and page to which you refer (keeping your views to a maximum of 400 words).

*No Response*

Page Score

0

## Scoring Summary

Pages	Total
1. About you	0
2. A minimum unit price for alcohol	0
3. A minimum unit price for alcohol	0
4. A ban on multi-buy promotions in the off-trade	0
5. A ban on multi-buy promotions in the off-trade	0

6. Reviewing the mandatory licensing conditions	0
7. Reviewing the mandatory licensing conditions	0
8. Health as a licensing objective for cumulative impact policies	0
9. Health as a licensing objective for cumulative impact policies	0
10. Freeing up responsible businesses	0
11. Freeing up responsible businesses	0
12. Freeing up responsible businesses	0
13. Freeing up responsible businesses	0
14. Freeing up responsible businesses	0
15. Freeing up responsible businesses	0
16. Impact assessments	0
<b>Total Survey Score:</b>	0

# Alcohol strategy consultation

---

User Details - 5453699

**Date Started:** 04/02/2013 11:17:41      **Date Ended:** 04/02/2013 11:44:09

**Time taken:** 26 mins, 28 secs      **IP Address:** n/a

**Unique ID:** n/a

---

## Page 1: About you

Q1. Please select if you would like your response or personal details to be treated as confidential.

*No Response*

Score

0

Q2. Which of the following best describes you or the professional interest you represent? Please select one option from the menu below.

Member of the public

Score

0

Q3. If you are responding on behalf of an organisation or interest group, please write in the box below the number of members in your group or organisation.

*No Response*

Q4. How did you obtain the views of your members? Please explain in the box below keeping your response to a maximum of 100 words.

*No Response*

Q5. Please indicate in which region you or your organisation is based. Please select one option from the menu below.

*No Response*

Score

0

Q6. If you are responding as a member of the public, what is your gender? Please select one option.

Female

Score

0

Q7. If you are responding as a member of the public, what is your age? Please select one option.

25-34

Score

0

Page Score

0

## Page 2: A minimum unit price for alcohol

Q8. In the alcohol strategy, the government committed to introducing a minimum unit price for alcohol in England and Wales. This consultation will contribute to the debate on the most appropriate price per unit and the mechanism by which, once set, minimum unit pricing would remain effective. It is also an opportunity for interested parties to raise other issues around minimum unit pricing. The purpose of minimum unit pricing is to reduce alcohol consumption, particularly by the most hazardous and harmful drinkers who tend to show a preference for the cheapest alcohol products. By doing so the government estimates there will be a reduction in the associated crime and health harms, especially the numbers of hospital admissions, alcohol-related deaths and alcohol-related crimes. Minimum unit pricing is not intended disproportionately to affect responsible drinkers or particular social groups but to reduce the availability of alcohol sold at very low or heavily discounted prices. More information (including the definitions of hazardous and harmful drinkers) is available in the full consultation document and the impact assessment. Do you want to answer questions on minimum unit pricing? Please select one option.

Yes

Score

0

Page Score

0

## Page 3: A minimum unit price for alcohol

Q9. The impact of minimum unit pricing will depend on the price per unit of alcohol. The government wants to ensure that the chosen price level is targeted and proportionate, whilst achieving a significant reduction of harm. The government is therefore consulting on the introduction of a recommended minimum unit price of 45p. The government estimates a reduction in consumption across all product types of 3.3 per cent, a reduction in crime of 5,240 per year, a reduction in 24,600 alcohol-related hospital admissions and 714 fewer deaths per year after ten years. Do you agree that this minimum unit price level would achieve these aims? Please select one option.

Yes

Score

0

Q10. Should other factors or evidence be considered when setting a minimum unit price for alcohol? Please select one option.

Don't know

Score

0

Q11. The government wishes to maintain the effectiveness of minimum unit

pricing and is therefore proposing to adjust the minimum unit price level over time. 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

Score

0

Q12. 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

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

pubs and restaurants could be affected if people chose not to go out as often due to the price

Score

0

Page Score

0

## **Page 4: A ban on multi-buy promotions in the off-trade**

Q13. The government is consulting on introducing a ban on multi-buy promotions in the off-trade (e.g. shops and off-licences) as part of its wider strategy to reduce excessive alcohol consumption, and alongside the introduction of a minimum unit price. A ban on multi-buy promotions would therefore not apply to pubs, clubs, bars or restaurants. The term 'multi-buy promotions' refers to alcohol promotions that offer a discount for buying multiple items. 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. As well as being part of a wider strategy to reduce consumption and tackle irresponsible alcohol sales, a ban on multi-buy promotions would also contribute to the government's aim of encouraging people to be aware of how much they drink and the risks of excessive drinking, so that they can make informed choices. The aim of this consultation is to assess support for such a ban and contribute to our understanding of the impact a ban on multi-buy promotions may have. The types of promotion it is proposed that a ban would include, are: two for the price of one, three for the price of two, buy one get one free, buy six and get 20 per cent off, 24 cans of lager costing less than 24 times the cost of a single 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, 3 for £10 where each bottle costs more than £3.33. More information is available in the full consultation document and the impact assessment. Do you want to answer questions

on a ban on multi-buy promotions in the off-trade? Please select one option.

Yes

Score

0

Page Score

0

## **Page 5: A ban on multi-buy promotions in the off-trade**

Q14. Do you think there should be a ban on multi-buy promotions involving alcohol in the off-trade? Please select one option.

Yes

Score

0

Q15. Are there any further offers which should be included in a ban on multi-buy promotions? Please select one option.

Don't know

Score

0

Q16. Should other factors or evidence be taken into account when considering a ban on multi-buy promotions? Please select one option.

Don't know

Score

0

Q17. 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.

Don't know

Score

0

Page Score

0

## **Page 6: Reviewing the mandatory licensing conditions**

Q18. 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 alcohol 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. The government has also committed to consult on whether these mandatory licensing conditions should, where relevant, apply to both the on- and off-trade. This consultation forms part of that review, and will contribute to the government's understanding of how these mandatory conditions are perceived. The five mandatory licensing conditions currently set out in

regulations in relation to the supply of alcohol are: a ban on irresponsible promotions a ban on dispensing alcohol by one person directly into the mouth of another a requirement to provide free tap water on request to customers a requirement to have an age verification policy to prevent the sale of alcohol to persons under 18 years of age, and a requirement to make available to customers small measures such as half pints or beer or cider or 125ml glasses of wine More information is available in the full consultation document. An explanation of each of these terms can be found on page 20 of the consultation document, in the glossary at the end. Do you want to answer questions on reviewing the mandatory licensing conditions? Please select one option.

Yes

Score

0

Page Score

0

## Page 7: Reviewing the mandatory licensing conditions

Q19. Do you think each of the mandatory licensing conditions is effective in promoting the licensing objectives? For more information on the licensing objectives please see the glossary at the end of the full consultation document. Please select one option (Yes, No, Don't know) from each drop down menu.

	Prevention of crime and disorder	Public safety	Prevention of public nuisance	Protection of children from harm
<b>Irresponsible promotions</b>	Yes	Yes	Yes	Yes
<b>Dispensing alcohol directly into the mouth</b>	Yes	Yes	Yes	Yes
<b>Mandatory provision of free tap water</b>	Don't know	Don't know	Don't know	Don't know
<b>Age verification policy</b>	Yes	Yes	Yes	Yes
<b>Mandatory provision of small measures</b>	Yes	Yes	Yes	Yes

Score

0

Q20. Do you think that the mandatory licensing conditions do enough to target irresponsible promotions in pubs and clubs? Please select one option.

No

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

im not sure what else could be done as pubs want to make money so they will promote the sale of alcohol as much as possible. maybe if pubs and clubs are fined if their customers become drunk and disorderly when on their premises as bar staff shouldn't be serving alcohol to those who are incredibly drunk, however not sure how this could be policed.

Score

0

Q21. Are there other issues related to the licensing objectives which could be tackled through a mandatory licensing condition? Please select one option.

Don't know

Score

0

Q22. Do you think that 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.

Don't know

Score

0

Page Score

0

## **Page 8: Health as a licensing objective for cumulative impact policies**

Q23. We want to ensure that licensing authorities are able to take alcohol-related health harms into consideration when making decisions about cumulative impact policies (CIPs) which can be used to manage problems linked to the density of premises in specific areas. 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. We are proposing 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. We expect that those areas with the highest levels of alcohol-related health harm, or fast rising levels of harm from alcohol, will be most

likely to use this power. It 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. More information is available in the full consultation document and impact assessment. Do you want to answer questions on health as a licensing objective for cumulative impact policies? Please select one option.

Yes

Score

0

Page Score

0

## Page 9: Health as a licensing objective for cumulative impact policies

Q24. 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):

*No Response*

Q25. 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.

Don't know

Score

0

Q26. 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 your answer in the box below, providing evidence to support your response (keeping your views to a maximum of 200 words):

*No Response*

Page Score

0

## Page 10: Freeing up responsible businesses

Q27. The government has committed to consult on giving licensing authorities greater freedom to take decisions that reflect the needs of their local community. Following the government's Red Tape Challenge in 2011, three areas of reform were specified: alcohol licensing for certain types of premises providing minimal alcohol sales, temporary event notices (TENs) and the licensing of late night refreshment. This section asks for views on these proposals and suggests further ways to reduce burdens on business. The proposals set out here can be seen alongside work undertaken by the Department for Culture, Media and Sport to remove unnecessary red tape from regulated entertainment. More information on each of these areas for reform is available in the full consultation document. There are five subjects covered in this section. They are: ancillary sales of alcohol occasional

provision of licensable activities at community eventsan extension of the temporary event notice limit at individual premiseslate night refreshment, andfurther proposals to reduce burdens on business Do you want to answer questions on freeing up responsible businesses? Please select one option.

Yes

Score

0

Page Score

0

## Page 11: Freeing up responsible businesses

Q28. Ancillary sales of alcohol For many businesses, the sale of alcohol is only a small part of, or incidental to, their wider activities, and occurs alongside the provision of another product or service (which this consultation refers to as an 'ancillary sale'). For example, a guesthouse might wish to provide wine to its guests with an evening meal or a complimentary bottle of wine in a guest's room, while a hairdresser might wish to offer clients a glass of wine. 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
<b>The provision should be limited to a specific list of certain types of business and the kinds of sales they make</b>	X		
<b>The provision should be available to all businesses providing they meet certain qualification criteria to be an ancillary seller</b>		X	
<b>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 the above options</b>		X	

Score

0

Q29. If special provisions 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.

	Yes	No	Don't know
<b>Accommodation providers providing alcohol</b>		X	

<b>alongside accommodation as part of the contract</b>			
<b>Hair and beauty salons, providing alcohol alongside a hair or beauty treatment</b>	X		
<b>Florists, providing alcohol alongside the purchase of flowers</b>	X		
<b>Cultural organisations, such as theatres, cinemas and museums, providing alcohol alongside cultural events as part of the entry ticket</b>		X	
<b>Regular charitable events, providing alcohol as part of the wider occasion</b>	X		

Score

0

Q30. 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 suggestions in the box below, keeping your views to a maximum of 200 words:

*No Response*

Q31. 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. Alternatively, a second option is to broaden the definition of 'ancillary sales' to include all businesses (and/or not for profit activities) through the use of a general set of qualification criteria, for example, to the effect that: alcohol must be sold or supplied as a small part or proportion of a sales transaction or contract for a wider service, and the amount of alcohol that could be supplied as part of that contract cannot exceed a prescribed amount. Do you think that the qualification criteria proposed meet this aim?

Don't know

Score

0

Q32. Do you think that these proposals would significantly reduce the burdens on ancillary sellers? Please select one option in each row.

	<b>Yes</b>	<b>No</b>	<b>Don't know</b>
<b>Allow premises making ancillary sales to request in their premises licence application that the requirement for a personal licence holder be removed</b>			X

<b>Introduce a new, light-touch form of authorisation for premises making ancillary sales - an ASN but retaining the need for a personal licence holder</b>			X
<b>Introduce a new, light touch form of authorisation for premises making ancillary sales - an ASN - with no requirement for a personal licence holder</b>			X

Score

0

Q33. Do you think these proposals would impact adversely on one or more of the licensing objectives? Please select one option.

	Yes	No	Don't know
<b>Allow premises making ancillary sales to request in their premises licence application that the requirement for a personal licence holder be removed</b>			X
<b>Introduce a new, light-touch form of authorisation for premises making ancillary sales - an ASN but retaining the need for a personal licence holder</b>			X
<b>Introduce a new, light touch form of authorisation for premises making ancillary sales - an ASN - with no requirement for a personal licence holder</b>			X

Score

0

Q34. 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 response to a maximum of 200 words:

**No Response**

Page Score

0

## Page 12: Freeing up responsible businesses

Q35. 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

Score

0

Q36. 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
<b>Reduce the burden</b>	X		
<b>Increase the burden</b>		X	

Score

0

Page Score

0

## Page 13: Freeing up responsible businesses

Q37. Should the number of TENs which can be given in respect of individual premises be increased? Please select one option.

Don't know

Score

0

Q38. If you answered yes, please select one option to indicate which you would prefer. Please select one option.

*No Response*

Score

0

Page Score

0

## Page 14: Freeing up responsible businesses

Q39. 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
<b>Determining that premises in certain areas are exempt</b>			X
<b>Determining that certain premises types are exempt in their local area</b>			X

Score

0

Q40. 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

Score

0

Q41. 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).

No Response

Page Score

0

## Page 15: Freeing up responsible businesses

Q42. Do you agree with each of the following proposals? Please select one option in each row.

	Yes	No	Don't know
<b>Remove requirements to advertise licensing applications in local newspapers</b>			X
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs for the on and off-trade</b>		X	
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs, but only in respect of overnight accommodation - lodges</b>		X	
<b>Remove or simplify requirements to renew personal licences under the 2003 Act</b>			X

Score

0

Q43. 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
<b>Remove requirements to advertise licensing applications in local newspapers</b>	X		
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs for the on and off-trade</b>		X	
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs, but only in respect of overnight accommodation - lodges</b>		X	
<b>Remove or simplify requirements to renew personal licences under the 2003 Act</b>			X

Score

0

Q44. 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.

	Yes	No	Don't know
<b>Remove requirements to advertise licensing applications in local newspapers</b>			X
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs for the on and off-trade</b>			X
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs, but only in respect of overnight accommodation - lodges</b>			X
<b>Remove or simplify requirements to renew personal licences under the 2003 Act</b>			X

Score

0

Q45. 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 keep your views to a maximum of 200 words.)

*No Response*

Page Score

0

## Page 16: Impact assessments

Q46. Impact assessments for the proposals in this consultation have been published alongside the full consultation document. 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
<b>Minimum unit pricing</b>			X
<b>Multi-buy promotions</b>			X
<b>Health as a licensing objective for cumulative impact</b>			X
<b>Ancillary sales of alcohol</b>			X
<b>Temporary event notices</b>			X
<b>Late night refreshment</b>			X

<b>Removing the duty to advertise licence applications in a local newspaper</b>			X
<b>Sales of alcohol at motorway service stations</b>			X
<b>Personal licences</b>			X
<b>Score</b>			

0

Q47. Do you have any comments on the methodologies or assumptions used in the impact assessments? If yes, please specify in the box below, clearly referencing the impact assessment and page to which you refer (keeping your views to a maximum of 400 words).

*No Response*

**Page Score**

0

## Scoring Summary

Pages	Total
1. About you	0
2. A minimum unit price for alcohol	0
3. A minimum unit price for alcohol	0
4. A ban on multi-buy promotions in the off-trade	0
5. A ban on multi-buy promotions in the off-trade	0
6. Reviewing the mandatory licensing conditions	0
7. Reviewing the mandatory licensing conditions	0
8. Health as a licensing objective for cumulative impact policies	0
9. Health as a licensing objective for cumulative impact policies	0
10. Freeing up responsible businesses	0
11. Freeing up responsible businesses	0

12. Freeing up responsible businesses	0
13. Freeing up responsible businesses	0
14. Freeing up responsible businesses	0
15. Freeing up responsible businesses	0
16. Impact assessments	0
<b>Total Survey Score:</b>	<b>0</b>

# Alcohol strategy consultation

User Details - 5452377

**Date Started:** 04/02/2013 09:08:16    **Date Ended:** 04/02/2013 12:04:16

**Time taken:** 2 hrs, 56 mins, 0 secs    **IP Address:** n/a

**Unique ID:** n/a

## Page 1: About you

Q1. Please select if you would like your response or personal details to be treated as confidential.

*No Response*

Score

0

Q2. Which of the following best describes you or the professional interest you represent? Please select one option from the menu below.

Public health body (eg Primary Care Trust, Local Health Board, Director of Public Health)

***Please specify which organisation, licensing authority or police force you represent in the box below:***

NHS Nottingham City

Score

0

Q3. If you are responding on behalf of an organisation or interest group, please write in the box below the number of members in your group or organisation.

*No Response*

Q4. How did you obtain the views of your members? Please explain in the box below keeping your response to a maximum of 100 words.

*No Response*

Q5. Please indicate in which region you or your organisation is based. Please select one option from the menu below.

East Midlands

Score

0

Q6. If you are responding as a member of the public, what is your gender? Please select one option.

*No Response*

Score

0

Q7. If you are responding as a member of the public, what is your age?

Please select one option.

**No Response**

Score

0

Page Score

0

## Page 2: A minimum unit price for alcohol

Q8. In the alcohol strategy, the government committed to introducing a minimum unit price for alcohol in England and Wales. This consultation will contribute to the debate on the most appropriate price per unit and the mechanism by which, once set, minimum unit pricing would remain effective. It is also an opportunity for interested parties to raise other issues around minimum unit pricing. The purpose of minimum unit pricing is to reduce alcohol consumption, particularly by the most hazardous and harmful drinkers who tend to show a preference for the cheapest alcohol products. By doing so the government estimates there will be a reduction in the associated crime and health harms, especially the numbers of hospital admissions, alcohol-related deaths and alcohol-related crimes. Minimum unit pricing is not intended disproportionately to affect responsible drinkers or particular social groups but to reduce the availability of alcohol sold at very low or heavily discounted prices. More information (including the definitions of hazardous and harmful drinkers) is available in the full consultation document and the impact assessment. Do you want to answer questions on minimum unit pricing? Please select one option.

Yes

Score

0

Page Score

0

## Page 3: A minimum unit price for alcohol

Q9. The impact of minimum unit pricing will depend on the price per unit of alcohol. The government wants to ensure that the chosen price level is targeted and proportionate, whilst achieving a significant reduction of harm. The government is therefore consulting on the introduction of a recommended minimum unit price of 45p. The government estimates a reduction in consumption across all product types of 3.3 per cent, a reduction in crime of 5,240 per year, a reduction in 24,600 alcohol-related hospital admissions and 714 fewer deaths per year after ten years. Do you agree that this minimum unit price level would achieve these aims? Please select one option.

No

***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):***

We agree that MUP is an effective way of targeting the heaviest drinkers

and reducing harm; however the level needs to be high enough to be effective in achieving these aims and we believe that a 45p MUP level at current prices is too low. We would support a 50p MUP level in order to provide something closer to the level of benefits originally identified in the ScHARR report at a 45p level at that time, rather than adopting a lower MUP and accepting lower benefits. Before adjusting for the change in price effect over time, a 50p MUP would reduce consumption by 6.9% overall and would cost a moderate drinker only an additional £12 per year, compared to £167 per year for harmful drinkers (ScHARR, 2008). This compares to just a 3.3% reduction from a 45p MUP (in the adjusted model; 4.5% in the original). This higher level would provide far greater benefits in terms of crime, deaths and hospital admissions, while having very little additional cost impact on moderate drinkers.

Score

0

Q10. Should other factors or evidence be considered when setting a minimum unit price for alcohol? Please select one option.

Yes

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

All factors included in the impact assessment should be fully considered at the higher 50p MUP level, including the impact on absenteeism that is not summarised in the table on p16 of the consultation document. The impact on lost revenue from alcohol duty is mitigated by the value of direct cost savings and QALY gains related to alcohol and crime. In addition, the possibilities of reduction in price of healthier goods if supermarkets are unable to use alcohol as a loss leader may have positive implications for other areas of public health. This could be linked to the Government's Responsibility Deal, if not through a more formal approach.

Score

0

Q11. The government wishes to maintain the effectiveness of minimum unit pricing and is therefore proposing to adjust the minimum unit price level over time. 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 automatically be updated in line with inflation each year

Score

0

Q12. 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

***If yes, please specify in the box below (keeping your views to a***

*maximum of 100 words):*

There may be a positive impact on the on-trade due to a lesser price differential between the on- and off-trades (as per the impact assessment). There may also be a reduction in pre-loading that results from off-trade alcohol being available significantly cheaper than on-trade. There may also be positive opportunities for smaller off-trade retailers as it should be easier for them to compete with the larger supermarkets on price.

Score

0

Page Score

0

## **Page 4: A ban on multi-buy promotions in the off-trade**

Q13. The government is consulting on introducing a ban on multi-buy promotions in the off-trade (e.g. shops and off-licences) as part of its wider strategy to reduce excessive alcohol consumption, and alongside the introduction of a minimum unit price. A ban on multi-buy promotions would therefore not apply to pubs, clubs, bars or restaurants. The term 'multi-buy promotions' refers to alcohol promotions that offer a discount for buying multiple items. 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. As well as being part of a wider strategy to reduce consumption and tackle irresponsible alcohol sales, a ban on multi-buy promotions would also contribute to the government's aim of encouraging people to be aware of how much they drink and the risks of excessive drinking, so that they can make informed choices. The aim of this consultation is to assess support for such a ban and contribute to our understanding of the impact a ban on multi-buy promotions may have. The types of promotion it is proposed that a ban would include, are: two for the price of one, three for the price of two, buy one get one free, buy six and get 20 per cent off, 24 cans of lager costing less than 24 times the cost of a single 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, 3 for £10 where each bottle costs more than £3.33. More information is available in the full consultation document and the impact assessment. Do you want to answer questions on a ban on multi-buy promotions in the off-trade? Please select one option.

Yes

Score

0

Page Score

0

## **Page 5: A ban on multi-buy promotions in the off-trade**

Q14. Do you think there should be a ban on multi-buy promotions involving alcohol in the off-trade? Please select one option.

Yes

Score

0

Q15. Are there any further offers which should be included in a ban on multi-buy promotions? Please select one option.

Yes

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

Even where items are available individually for the same/lower price, promotions such as 3 for £10 are likely to encourage multi-buys. Consideration should be given to how this would be addressed, as these promotions may still encourage people to buy more than they otherwise would.

Score

0

Q16. Should other factors or evidence be taken into account when considering a ban on multi-buy promotions? Please select one option.

Yes

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

This ban should be aligned to minimum unit pricing at a minimum level of 50p per unit. For example, half price (£10 to £5) or '3 for...' offers on bottles of wine should not be able to go below the minimum unit price.

Score

0

Q17. 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

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

There may be a positive impact on the on-trade due to a lesser price differential between the on- and off-trades. There may also be a reduction in pre-loading that results from off-trade alcohol being available significantly cheaper than on-trade. There may also be positive opportunities for smaller off-trade retailers as it should be easier for them to compete with the larger supermarkets on price.

Score

0

Page Score

0

**Page 6: Reviewing the mandatory licensing**

## conditions

Q18. 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 alcohol 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. The government has also committed to consult on whether these mandatory licensing conditions should, where relevant, apply to both the on- and off-trade. This consultation forms part of that review, and will contribute to the government's understanding of how these mandatory conditions are perceived. The five mandatory licensing conditions currently set out in regulations in relation to the supply of alcohol are: a ban on irresponsible promotions, a ban on dispensing alcohol by one person directly into the mouth of another, a requirement to provide free tap water on request to customers, a requirement to have an age verification policy to prevent the sale of alcohol to persons under 18 years of age, and a requirement to make available to customers small measures such as half pints of beer or cider or 125ml glasses of wine. More information is available in the full consultation document. An explanation of each of these terms can be found on page 20 of the consultation document, in the glossary at the end. Do you want to answer questions on reviewing the mandatory licensing conditions? Please select one option.

Yes

Score

0

Page Score

0

## Page 7: Reviewing the mandatory licensing conditions

Q19. Do you think each of the mandatory licensing conditions is effective in promoting the licensing objectives? For more information on the licensing objectives please see the glossary at the end of the full consultation document. Please select one option (Yes, No, Don't know) from each drop down menu.

	<b>Prevention of crime and disorder</b>	<b>Public safety</b>	<b>Prevention of public nuisance</b>	<b>Protection of children from harm</b>
<b>Irresponsible promotions</b>	Don't know	Don't know	Don't know	No
<b>Dispensing alcohol directly into the mouth</b>	Don't know	Don't know	Don't know	No

<b>Mandatory provision of free tap water</b>	Yes	Yes	Yes	No
<b>Age verification policy</b>	Don't know	Don't know	Don't know	Yes
<b>Mandatory provision of small measures</b>	Yes	Yes	Yes	No

Score

0

Q20. Do you think that the mandatory licensing conditions do enough to target irresponsible promotions in pubs and clubs? Please select one option.

No

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

Clear guidance (in law) regarding what constitutes an irresponsible promotion is needed, e.g. 5 bombs for £5 is above the proposed minimum unit price but we consider it to be irresponsible but are restricted in law and in practice in terms of addressing this. Where we have answered Don't Know to question 9 above, e.g. for dispensing alcohol directly into the mouth, this is because we don't have particular issues in Nottingham with dispensing alcohol directly into the mouth but generally we don't think the mandatory licensing conditions are effective in promoting the licensing objectives.

Score

0

Q21. Are there other issues related to the licensing objectives which could be tackled through a mandatory licensing condition? Please select one option.

Yes

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

Mandatory requirement to have free machine water in venues (rather than mandatory provision of free tap water on request). There should be a default position/assumption for wine, spirits, measures that e.g. a gin and tonic is a single, glass of wine is a small 125 ml etc unless the customer specifically requests otherwise.

Score

0

Q22. Do you think that 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.

No

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

No irresponsible promotions should also be applied to the off-trade, as should a limit on the maximum bottle size that can be purchased for certain types of products e.g. beers, ciders, lagers over 5.6% Nottingham City are introducing a voluntary code for off licences and supermarkets to seek their support in voluntarily removing lagers, beers, ciders over 5.6%.

Score

0

Page Score

0

## **Page 8: Health as a licensing objective for cumulative impact policies**

Q23. We want to ensure that licensing authorities are able to take alcohol-related health harms into consideration when making decisions about cumulative impact policies (CIPs) which can be used to manage problems linked to the density of premises in specific areas. 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. We are proposing 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. We expect that those areas with the highest levels of alcohol-related health harm, or fast rising levels of harm from alcohol, will be most likely to use this power. It 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. More information is available in the full consultation document and impact assessment. Do you want to answer questions on health as a licensing objective for cumulative impact policies? Please select one option.

Yes

Score

0

Page Score

0

## **Page 9: Health as a licensing objective for cumulative impact policies**

Q24. 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):

Alcohol related hospital admissions and deaths across a broad area (e.g. city-wide) should be considered. Consumption estimates could also be considered, but only local authority-level synthetic estimates are widely available and local estimates of consumption do not seem to reflect the levels of harm indicated by hospital data. This data can not be linked to particular premises, so is only useful in the consideration of cumulative impact.

A&E violence data is available and could be linked to smaller geographical areas, but data quality locally needs improving and does not identify whether the attendance is alcohol related. This is also most relevant in the consideration of cumulative impact, rather than attempting to link the data to particular premises.

Q25. 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

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

The process is currently focussed primarily on crime and disorder evidence from the Police and considered from the point of view of the cumulative impact of another on or off-licence premise in the saturation zone rather than the health impact of another premise. It would be difficult to prove that an additional on- and off-licence premise in an area would, in itself, have a further impact on health. This limitation should be taken into consideration. Cumulative impact policies, once in place, need to be strongly supported by local licensing panels so as to be effective.

Score

0

Q26. 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 your answer in the box below, providing evidence to support your response (keeping your views to a maximum of 200 words):

Positive, particularly in areas such as Nottingham with high rates of alcohol related hospital admissions, providing:

- There is not an expectation that health harms data can be reliably provided at a small-area level, or linked to the impact of particular premises;
- The cumulative impact policy is adhered to once in place.

Page Score

0

## **Page 10: Freeing up responsible businesses**

Q27. The government has committed to consult on giving licensing authorities greater freedom to take decisions that reflect the needs of their

local community. Following the government's Red Tape Challenge in 2011, three areas of reform were specified: alcohol licensing for certain types of premises providing minimal alcohol sales, temporary event notices (TENs) and the licensing of late night refreshment. This section asks for views on these proposals and suggests further ways to reduce burdens on business. The proposals set out here can be seen alongside work undertaken by the Department for Culture, Media and Sport to remove unnecessary red tape from regulated entertainment. More information on each of these areas for reform is available in the full consultation document. There are five subjects covered in this section. They are: ancillary sales of alcohol occasional provision of licensable activities at community events an extension of the temporary event notice limit at individual premises late night refreshment, and further proposals to reduce burdens on business Do you want to answer questions on freeing up responsible businesses? Please select one option.

Yes

Score

0

Page Score

0

## Page 11: Freeing up responsible businesses

Q28. Ancillary sales of alcohol For many businesses, the sale of alcohol is only a small part of, or incidental to, their wider activities, and occurs alongside the provision of another product or service (which this consultation refers to as an 'ancillary sale'). For example, a guesthouse might wish to provide wine to its guests with an evening meal or a complimentary bottle of wine in a guest's room, while a hairdresser might wish to offer clients a glass of wine. 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
<b>The provision should be limited to a specific list of certain types of business and the kinds of sales they make</b>		X	
<b>The provision should be available to all businesses providing they meet certain qualification criteria to be an ancillary seller</b>	X		
<b>The provision should be available to both a specific list of premises and more widely to organisations meeting the prescribed definition of</b>			X

<b>an ancillary seller, that is both the above options</b>			
--	--	--	--

Score

0

Q29. If special provisions 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.

	Yes	No	Don't know
<b>Accommodation providers, providing alcohol alongside accommodation as part of the contract</b>		X	
<b>Hair and beauty salons, providing alcohol alongside a hair or beauty treatment</b>	X		
<b>Florists, providing alcohol alongside the purchase of flowers</b>	X		
<b>Cultural organisations, such as theatres, cinemas and museums, providing alcohol alongside cultural events as part of the entry ticket</b>		X	
<b>Regular charitable events, providing alcohol as part of the wider occasion</b>		X	

Score

0

Q30. 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 suggestions in the box below, keeping your views to a maximum of 200 words:

No. The Government's work to reduce the burden of bureaucracy should not allow the availability of alcohol to be increased.

Q31. 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. Alternatively, a second option is to broaden the definition of 'ancillary sales' to include all businesses (and/or not for profit activities) through the use of a general set of qualification criteria, for example, to the effect that: alcohol must be sold or supplied as a small part or proportion of a sales transaction or contract for a wider service, and the amount of alcohol that could be supplied as part of that contract cannot exceed a prescribed amount. Do you think that the qualification criteria proposed meet this aim?

Don't know

***Please use the space below to provide further comments (keeping your views to a maximum of 200 words):***

More information on what a prescribed amount is, what businesses potentially could buy into this and what the business needs are would be needed to make an informed decision. As stated above, the Government's work to reduce the burden of bureaucracy should not allow the availability of alcohol to be increased.

Score

0

Q32. 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
<b>Allow premises making ancillary sales to request in their premises licence application that the requirement for a personal licence holder be removed</b>	X		
<b>Introduce a new, light-touch form of authorisation for premises making ancillary sales - an ASN but retaining the need for a personal licence holder</b>			X
<b>Introduce a new, light touch form of authorisation for premises making ancillary sales - an ASN - with no requirement for a personal licence holder</b>		X	

Score

0

Q33. Do you think these proposals would impact adversely on one or more of the licensing objectives? Please select one option.

	Yes	No	Don't know
<b>Allow premises making ancillary sales to request in their premises licence application that the requirement for a personal licence holder be removed</b>		X	
<b>Introduce a new, light-touch form of authorisation for premises making ancillary sales - an ASN but retaining the need for a personal licence holder</b>			X
<b>Introduce a new, light touch form of authorisation for premises making ancillary sales - an ASN - with no requirement for a personal licence holder</b>	X		

Score

0

Q34. 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 response to a maximum of 200 words:

We have concerns about where the burden of proof lies (i.e. the applicant or the licensing authority) and how the licensing authority would monitor compliance (i.e. who would monitor it and how)?

The objective of introducing lighter touch authorisation should be questioned. In a comparison of the harm caused by drug use, the final report of the UK Drugs Commission (October 2012) scores alcohol higher than any other drug considered.

It would be appropriate to consider a Cumulative Impact Statement for the area in which the ancillary seller would be trading.

There should be an ability to revoke or remove an ancillary sales notice and to restrict hours of operation.

A procedure similar to that for minor variations would appear to be an appropriate mechanism.

Licensing authorities should have the power to require a full licence should problems arise as a result of a business's ancillary seller status.

Any de-regulation should be balanced against the risk of an increase in alcohol consumption and the likely impact on health, crime and disorder and risk of underage sales.

Page Score

0

## Page 12: Freeing up responsible businesses

Q35. 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.

No

Score

0

Q36. 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
Reduce the burden	X		
Increase the burden		X	

Score

0

Page Score

0

## Page 13: Freeing up responsible businesses

Q37. Should the number of TENS which can be given in respect of individual premises be increased? Please select one option.

No

Score

0

Q38. If you answered yes, please select one option to indicate which you would prefer. Please select one option.

*No Response*

Score

0

Page Score

0

## Page 14: Freeing up responsible businesses

Q39. 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
<b>Determining that premises in certain areas are exempt</b>	X		
<b>Determining that certain premises types are exempt in their local area</b>		X	

Score

0

Q40. 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

Score

0

Q41. 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).

None

Page Score

0

## Page 15: Freeing up responsible businesses

Q42. Do you agree with each of the following proposals? Please select

one option in each row.

	Yes	No	Don't know
<b>Remove requirements to advertise licensing applications in local newspapers</b>	X		
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs for the on and off-trade</b>		X	
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs, but only in respect of overnight accommodation - lodges</b>		X	
<b>Remove or simplify requirements to renew personal licences under the 2003 Act</b>		X	

Score

0

Q43. 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
<b>Remove requirements to advertise licensing applications in local newspapers</b>	X		
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs for the on and off-trade</b>		X	
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs, but only in respect of overnight accommodation - lodges</b>		X	
<b>Remove or simplify requirements to renew personal licences under the 2003 Act</b>	X		

Score

0

Q44. 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.

	Yes	No	Don't know
<b>Remove requirements to advertise licensing applications in local newspapers</b>		X	

<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs for the on and off-trade</b>	X		
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs, but only in respect of overnight accommodation - lodges</b>	X		
<b>Remove or simplify requirements to renew personal licences under the 2003 Act</b>			X

Score

0

Q45. 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 keep your views to a maximum of 200 words.)

In answer to question 30 regarding agreeing with each of the four proposals, the answer is no unless powers are given to the licensing authority to revoke personal licences on application of Trading Standards and/or police.

Page Score

0

## Page 16: Impact assessments

Q46. Impact assessments for the proposals in this consultation have been published alongside the full consultation document. 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
<b>Minimum unit pricing</b>	X		
<b>Multi-buy promotions</b>	X		
<b>Health as a licensing objective for cumulative impact</b>	X		
<b>Ancillary sales of alcohol</b>			X
<b>Temporary event notices</b>			X
<b>Late night refreshment</b>			X
<b>Removing the duty to advertise licence applications in a local newspaper</b>			X

<b>Sales of alcohol at motorway service stations</b>			X
<b>Personal licences</b>			X

Score

0

Q47. Do you have any comments on the methodologies or assumptions used in the impact assessments? If yes, please specify in the box below, clearly referencing the impact assessment and page to which you refer (keeping your views to a maximum of 400 words).

*No Response*

Page Score

0

## Scoring Summary

Pages	Total
1. About you	0
2. A minimum unit price for alcohol	0
3. A minimum unit price for alcohol	0
4. A ban on multi-buy promotions in the off-trade	0
5. A ban on multi-buy promotions in the off-trade	0
6. Reviewing the mandatory licensing conditions	0
7. Reviewing the mandatory licensing conditions	0
8. Health as a licensing objective for cumulative impact policies	0
9. Health as a licensing objective for cumulative impact policies	0
10. Freeing up responsible businesses	0
11. Freeing up responsible businesses	0
12. Freeing up responsible businesses	0
13. Freeing up responsible businesses	0

14. Freeing up responsible businesses	0
15. Freeing up responsible businesses	0
16. Impact assessments	0
<b>Total Survey Score:</b>	0

# Alcohol strategy consultation

User Details - 5454018

**Date Started:** 04/02/2013 11:48:40      **Date Ended:** 04/02/2013 12:26:48

**Time taken:** 38 mins, 8 secs      **IP Address:** n/a

**Unique ID:** n/a

## Page 1: About you

Q1. Please select if you would like your response or personal details to be treated as confidential.

*No Response*

Score

0

Q2. Which of the following best describes you or the professional interest you represent? Please select one option from the menu below.

Local government (other)

***Please specify which organisation, licensing authority or police force you represent in the box below:***

Warwickshire County Council - Commissioning substance misuse services for young people

Score

0

Q3. If you are responding on behalf of an organisation or interest group, please write in the box below the number of members in your group or organisation.

*No Response*

Q4. How did you obtain the views of your members? Please explain in the box below keeping your response to a maximum of 100 words.

*No Response*

Q5. Please indicate in which region you or your organisation is based. Please select one option from the menu below.

West Midlands

Score

0

Q6. If you are responding as a member of the public, what is your gender? Please select one option.

*No Response*

Score

0

Q7. If you are responding as a member of the public, what is your age?

Please select one option.

**No Response**

Score

0

Page Score

0

## Page 2: A minimum unit price for alcohol

Q8. In the alcohol strategy, the government committed to introducing a minimum unit price for alcohol in England and Wales. This consultation will contribute to the debate on the most appropriate price per unit and the mechanism by which, once set, minimum unit pricing would remain effective. It is also an opportunity for interested parties to raise other issues around minimum unit pricing. The purpose of minimum unit pricing is to reduce alcohol consumption, particularly by the most hazardous and harmful drinkers who tend to show a preference for the cheapest alcohol products. By doing so the government estimates there will be a reduction in the associated crime and health harms, especially the numbers of hospital admissions, alcohol-related deaths and alcohol-related crimes. Minimum unit pricing is not intended disproportionately to affect responsible drinkers or particular social groups but to reduce the availability of alcohol sold at very low or heavily discounted prices. More information (including the definitions of hazardous and harmful drinkers) is available in the full consultation document and the impact assessment. Do you want to answer questions on minimum unit pricing? Please select one option.

Yes

Score

0

Page Score

0

## Page 3: A minimum unit price for alcohol

Q9. The impact of minimum unit pricing will depend on the price per unit of alcohol. The government wants to ensure that the chosen price level is targeted and proportionate, whilst achieving a significant reduction of harm. The government is therefore consulting on the introduction of a recommended minimum unit price of 45p. The government estimates a reduction in consumption across all product types of 3.3 per cent, a reduction in crime of 5,240 per year, a reduction in 24,600 alcohol-related hospital admissions and 714 fewer deaths per year after ten years. Do you agree that this minimum unit price level would achieve these aims? Please select one option.

No

***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):***

It is agreed that minimum pricing would reduce the negative outcomes

described. However, a minimum unit price of 50p is preferred. Minimum pricing is expected to have a greater impact on young people (where the young person is the purchaser) and therefore the introduction of minimum pricing is fully supported. The culture change needed to reverse current attitudes to alcohol will not be reversed solely by minimum pricing. The strategy also sets out expectations for schools and 'positive for youth' in order to educate young people about the risks of alcohol and provide diversionary activities. This part of the strategy is unlikely to be fully realised whilst PSHE remains non-statutory and whilst funding for targeted youth support and early intervention services is reduced. The focus on 18-24 year olds later in the strategy is welcomed. Drinking behaviour by peers and elder siblings within this age group has a significant impact on young people under 18 and currently goes largely unchallenged. The strategy would benefit from more focus on parental drinking. Evidence shows that parents are the single biggest factor in shaping their children's attitudes to alcohol. Promotion of responsible drinking by parents would further reduce the number of young people engaging in binge drinking.

Score

0

Q10. Should other factors or evidence be considered when setting a minimum unit price for alcohol? Please select one option.

No

Score

0

Q11. The government wishes to maintain the effectiveness of minimum unit pricing and is therefore proposing to adjust the minimum unit price level over time. 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 automatically be updated in line with inflation each year

Score

0

Q12. 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.

No

Score

0

Page Score

0

## Page 4: A ban on multi-buy promotions in the off-trade

Q13. The government is consulting on introducing a ban on multi-buy

promotions in the off-trade (e.g. shops and off-licences) as part of its wider strategy to reduce excessive alcohol consumption, and alongside the introduction of a minimum unit price. A ban on multi-buy promotions would therefore not apply to pubs, clubs, bars or restaurants. The term 'multi-buy promotions' refers to alcohol promotions that offer a discount for buying multiple items. 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. As well as being part of a wider strategy to reduce consumption and tackle irresponsible alcohol sales, a ban on multi-buy promotions would also contribute to the government's aim of encouraging people to be aware of how much they drink and the risks of excessive drinking, so that they can make informed choices. The aim of this consultation is to assess support for such a ban and contribute to our understanding of the impact a ban on multi-buy promotions may have. The types of promotion it is proposed that a ban would include, are: two for the price of one, three for the price of two, buy one get one free, buy six and get 20 per cent off, 24 cans of lager costing less than 24 times the cost of a single 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, 3 for £10 where each bottle costs more than £3.33. More information is available in the full consultation document and the impact assessment. Do you want to answer questions on a ban on multi-buy promotions in the off-trade? Please select one option.

No

Score

0

Page Score

0

## Page 5: A ban on multi-buy promotions in the off-trade

Q14. Do you think there should be a ban on multi-buy promotions involving alcohol in the off-trade? Please select one option.

Yes

Score

0

Q15. Are there any further offers which should be included in a ban on multi-buy promotions? Please select one option.

No

Score

0

Q16. Should other factors or evidence be taken into account when considering a ban on multi-buy promotions? Please select one option.

No

Score

0

Q17. 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.

No

Score

0

Page Score

0

## Page 6: Reviewing the mandatory licensing conditions

Q18. 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 alcohol 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. The government has also committed to consult on whether these mandatory licensing conditions should, where relevant, apply to both the on- and off-trade. This consultation forms part of that review, and will contribute to the government's understanding of how these mandatory conditions are perceived. The five mandatory licensing conditions currently set out in regulations in relation to the supply of alcohol are: a ban on irresponsible promotions a ban on dispensing alcohol by one person directly into the mouth of another a requirement to provide free tap water on request to customers a requirement to have an age verification policy to prevent the sale of alcohol to persons under 18 years of age, and a requirement to make available to customers small measures such as half pints or beer or cider or 125ml glasses of wine More information is available in the full consultation document. An explanation of each of these terms can be found on page 20 of the consultation document, in the glossary at the end. Do you want to answer questions on reviewing the mandatory licensing conditions? Please select one option.

No

Score

0

Page Score

0

## Page 7: Reviewing the mandatory licensing conditions

Q19. Do you think each of the mandatory licensing conditions is effective in promoting the licensing objectives? For more information on the licensing objectives please see the glossary at the end of the full consultation document. Please select one option (Yes, No, Don't know) from each drop

down menu.

*No Response*

Score

0

Q20. Do you think that the mandatory licensing conditions do enough to target irresponsible promotions in pubs and clubs? Please select one option.

*No Response*

Score

0

Q21. Are there other issues related to the licensing objectives which could be tackled through a mandatory licensing condition? Please select one option.

*No Response*

Score

0

Q22. Do you think that 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.

*No Response*

Score

0

Page Score

0

## **Page 8: Health as a licensing objective for cumulative impact policies**

Q23. We want to ensure that licensing authorities are able to take alcohol-related health harms into consideration when making decisions about cumulative impact policies (CIPs) which can be used to manage problems linked to the density of premises in specific areas. 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. We are proposing 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. We expect that those areas with the highest levels of alcohol-related health harm, or fast rising levels of harm from alcohol, will be most likely to use this power. It 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. More information is available in the full consultation document

and impact assessment. Do you want to answer questions on health as a licensing objective for cumulative impact policies? Please select one option.

No

Score

0

Page Score

0

## Page 9: Health as a licensing objective for cumulative impact policies

Q24. 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):

*No Response*

Q25. 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.

*No Response*

Score

0

Q26. 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 your answer in the box below, providing evidence to support your response (keeping your views to a maximum of 200 words):

*No Response*

Page Score

0

## Page 10: Freeing up responsible businesses

Q27. The government has committed to consult on giving licensing authorities greater freedom to take decisions that reflect the needs of their local community. Following the government's Red Tape Challenge in 2011, three areas of reform were specified: alcohol licensing for certain types of premises providing minimal alcohol sales, temporary event notices (TENs) and the licensing of late night refreshment. This section asks for views on these proposals and suggests further ways to reduce burdens on business. The proposals set out here can be seen alongside work undertaken by the Department for Culture, Media and Sport to remove unnecessary red tape from regulated entertainment. More information on each of these areas for reform is available in the full consultation document. There are five subjects covered in this section. They are: ancillary sales of alcohol occasional provision of licensable activities at community events an extension of the temporary event notice limit at individual premises late night refreshment, and further proposals to reduce burdens on business Do you want to answer questions on freeing up responsible businesses? Please select one option.

No

Score

0

Page Score

0

## Page 11: Freeing up responsible businesses

Q28. Ancillary sales of alcohol For many businesses, the sale of alcohol is only a small part of, or incidental to, their wider activities, and occurs alongside the provision of another product or service (which this consultation refers to as an 'ancillary sale'). For example, a guesthouse might wish to provide wine to its guests with an evening meal or a complimentary bottle of wine in a guest's room, while a hairdresser might wish to offer clients a glass of wine. 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.

*No Response*

Score

0

Q29. If special provisions 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.

*No Response*

Score

0

Q30. 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 suggestions in the box below, keeping your views to a maximum of 200 words:

*No Response*

Q31. 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. Alternatively, a second option is to broaden the definition of 'ancillary sales' to include all businesses (and/or not for profit activities) through the use of a general set of qualification criteria, for example, to the effect that: alcohol must be sold or supplied as a small part or proportion of a sales transaction or contract for a wider service, and the amount of alcohol that could be supplied as part of that contract cannot exceed a prescribed amount Do you think that the qualification criteria proposed meet this aim?

*No Response*

Score

0

Q32. Do you think that these proposals would significantly reduce the burdens on ancillary sellers? Please select one option in each row.

*No Response*

Score

0

Q33. Do you think these proposals would impact adversely on one or more of the licensing objectives? Please select one option.

*No Response*

Score

0

Q34. 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 response to a maximum of 200 words:

*No Response*

Page Score

0

## Page 12: Freeing up responsible businesses

Q35. 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.

*No Response*

Score

0

Q36. What impact do you think a locally determined notification would have on organisers of community events? Please select one option in each row.

*No Response*

Score

0

Page Score

0

## Page 13: Freeing up responsible businesses

Q37. Should the number of TENs which can be given in respect of individual premises be increased? Please select one option.

*No Response*

Score

0

Q38. If you answered yes, please select one option to indicate which you would prefer. Please select one option.

*No Response*

Score

0

Page Score

0

## Page 14: Freeing up responsible businesses

Q39. 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.

*No Response*

Score

0

Q40. 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.

*No Response*

Score

0

Q41. 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).

*No Response*

Page Score

0

## Page 15: Freeing up responsible businesses

Q42. Do you agree with each of the following proposals? Please select one option in each row.

*No Response*

Score

0

Q43. Do you think that each of the following would reduce the overall burdens on business? Please select one option in each row.

*No Response*

Score

0

Q44. 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.

*No Response*

Score

0

Q45. 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 keep your views to a maximum of 200 words.)

*No Response*

Page Score

0

## Page 16: Impact assessments

Q46. Impact assessments for the proposals in this consultation have been published alongside the full consultation document. 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.

*No Response*

Score

0

Q47. Do you have any comments on the methodologies or assumptions used in the impact assessments? If yes, please specify in the box below, clearly referencing the impact assessment and page to which you refer (keeping your views to a maximum of 400 words).

*No Response*

Page Score

0

## Scoring Summary

Pages	Total
1. About you	0
2. A minimum unit price for alcohol	0
3. A minimum unit price for alcohol	0
4. A ban on multi-buy promotions in the off-trade	0
5. A ban on multi-buy promotions in the off-trade	0
6. Reviewing the mandatory licensing conditions	0
7. Reviewing the mandatory licensing conditions	0
8. Health as a licensing objective for cumulative impact policies	0
9. Health as a licensing objective for cumulative impact policies	0
10. Freeing up responsible businesses	0
11. Freeing up responsible businesses	0
12. Freeing up responsible businesses	0
13. Freeing up responsible businesses	0

14. Freeing up responsible businesses	0
15. Freeing up responsible businesses	0
16. Impact assessments	0
<b>Total Survey Score:</b>	0

# Alcohol strategy consultation

User Details - 5321020

**Date Started:** 09/01/2013 12:31:08      **Date Ended:** 04/02/2013 12:28:22

**Time taken:** 623 hrs, 57 mins, 14 secs   **IP Address:** n/a

**Unique ID:** n/a

## Page 1: About you

Q1. Please select if you would like your response or personal details to be treated as confidential.

*No Response*

Score

0

Q2. Which of the following best describes you or the professional interest you represent? Please select one option from the menu below.

Person or organisation specialising in licensing law

***Please specify which organisation, licensing authority or police force you represent in the box below:***

Licensing Advice Project, Westminster Citizens Advice

Score

0

Q3. If you are responding on behalf of an organisation or interest group, please write in the box below the number of members in your group or organisation.

*No Response*

Q4. How did you obtain the views of your members? Please explain in the box below keeping your response to a maximum of 100 words.

*No Response*

Q5. Please indicate in which region you or your organisation is based.

Please select one option from the menu below.

London

Score

0

Q6. If you are responding as a member of the public, what is your gender?

Please select one option.

*No Response*

Score

0

Q7. If you are responding as a member of the public, what is your age?

Please select one option.

No Response

Score

0

Page Score

0

## Page 2: A minimum unit price for alcohol

Q8. In the alcohol strategy, the government committed to introducing a minimum unit price for alcohol in England and Wales. This consultation will contribute to the debate on the most appropriate price per unit and the mechanism by which, once set, minimum unit pricing would remain effective. It is also an opportunity for interested parties to raise other issues around minimum unit pricing. The purpose of minimum unit pricing is to reduce alcohol consumption, particularly by the most hazardous and harmful drinkers who tend to show a preference for the cheapest alcohol products. By doing so the government estimates there will be a reduction in the associated crime and health harms, especially the numbers of hospital admissions, alcohol-related deaths and alcohol-related crimes. Minimum unit pricing is not intended disproportionately to affect responsible drinkers or particular social groups but to reduce the availability of alcohol sold at very low or heavily discounted prices. More information (including the definitions of hazardous and harmful drinkers) is available in the full consultation document and the impact assessment. Do you want to answer questions on minimum unit pricing? Please select one option.

Yes

Score

0

Page Score

0

## Page 3: A minimum unit price for alcohol

Q9. The impact of minimum unit pricing will depend on the price per unit of alcohol. The government wants to ensure that the chosen price level is targeted and proportionate, whilst achieving a significant reduction of harm. The government is therefore consulting on the introduction of a recommended minimum unit price of 45p. The government estimates a reduction in consumption across all product types of 3.3 per cent, a reduction in crime of 5,240 per year, a reduction in 24,600 alcohol-related hospital admissions and 714 fewer deaths per year after ten years. Do you agree that this minimum unit price level would achieve these aims? Please select one option.

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):***

Some feedback I have received indicates that a MUP would be ineffective, as it is predicated on the assumption that heavy drinkers are likely to reduce

their consumption as a result of a price rise. However, other feedback is supportive based on the University of Sheffield modelling and the well-established relationship between price and harmful consumption of alcohol. A 50p MUP would ensure uniformity with Scotland.

Score

0

Q10. Should other factors or evidence be considered when setting a minimum unit price for alcohol? Please select one option.

Yes

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

Uniformity with Scotland.

Score

0

Q11. The government wishes to maintain the effectiveness of minimum unit pricing and is therefore proposing to adjust the minimum unit price level over time. 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 automatically be updated in line with inflation each year

Score

0

Q12. 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

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

Given the Government's predicted impacts of a minimum unit price, it would have the knock on effect of reducing the burden on the emergency services and health authorities. This in itself would have a knock on effect of improving access to these services for others. It could have a knock on effect for anyone affected by issues surrounding harmful drinking, for example local residents who endure noise and anti-social behaviour from street drinking.

Score

0

Page Score

0

## **Page 4: A ban on multi-buy promotions in the off-trade**

Q13. The government is consulting on introducing a ban on multi-buy promotions in the off-trade (e.g. shops and off-licences) as part of its wider

strategy to reduce excessive alcohol consumption, and alongside the introduction of a minimum unit price. A ban on multi-buy promotions would therefore not apply to pubs, clubs, bars or restaurants. The term 'multi-buy promotions' refers to alcohol promotions that offer a discount for buying multiple items. 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. As well as being part of a wider strategy to reduce consumption and tackle irresponsible alcohol sales, a ban on multi-buy promotions would also contribute to the government's aim of encouraging people to be aware of how much they drink and the risks of excessive drinking, so that they can make informed choices. The aim of this consultation is to assess support for such a ban and contribute to our understanding of the impact a ban on multi-buy promotions may have. The types of promotion it is proposed that a ban would include, are: two for the price of one, three for the price of two, buy one get one free, buy six and get 20 per cent off, 24 cans of lager costing less than 24 times the cost of a single 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, 3 for £10 where each bottle costs more than £3.33. More information is available in the full consultation document and the impact assessment. Do you want to answer questions on a ban on multi-buy promotions in the off-trade? Please select one option.

Yes

Score

0

Page Score

0

## Page 5: A ban on multi-buy promotions in the off-trade

Q14. Do you think there should be a ban on multi-buy promotions involving alcohol in the off-trade? Please select one option.

Yes

Score

0

Q15. Are there any further offers which should be included in a ban on multi-buy promotions? Please select one option.

Yes

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

Feedback suggests that a ban on multi-buy promotions would be ineffective unless there was a total ban. Presumably this means that in their view a ban on 'two for the price of one' offers would be ineffective if 'half price' offers remained. Feedback has also suggested that measures to prevent offers which encourage customers to buy greater quantities of alcohol than they would otherwise do, should be applied to the on trade too, although it is

appreciated that the on-trade is subject to the mandatory conditions re: irresponsible promotions.

Score

0

Q16. Should other factors or evidence be taken into account when considering a ban on multi-buy promotions? Please select one option.

Yes

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

The relationship between MUP and multi-buy promotions.

Score

0

Q17. 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

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

Given the Government's predicted impacts of banning multi-buy promotions, it would have the knock on effect of reducing the burden on the emergency services and health authorities. This in itself would have a knock on effect of improving access to these services for others. It could have a knock on effect for anyone affected by issues surrounding harmful drinking, for example local residents who endure noise and anti-social behaviour from street drinking.

Score

0

Page Score

0

## **Page 6: Reviewing the mandatory licensing conditions**

Q18. 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 alcohol 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. The government has also committed to consult on whether these mandatory licensing conditions should, where relevant, apply to both the on- and off-trade. This consultation forms part of that review, and will contribute to the government's understanding of how these mandatory conditions are perceived. The five mandatory licensing conditions currently set out in regulations in relation to the supply of alcohol are: a ban on irresponsible promotions a ban on dispensing alcohol by one person directly into the

mouth of another a requirement to provide free tap water on request to customers a requirement to have an age verification policy to prevent the sale of alcohol to persons under 18 years of age, and a requirement to make available to customers small measures such as half pints or beer or cider or 125ml glasses of wine More information is available in the full consultation document. An explanation of each of these terms can be found on page 20 of the consultation document, in the glossary at the end. Do you want to answer questions on reviewing the mandatory licensing conditions? Please select one option.

Yes

Score

0

Page Score

0

## Page 7: Reviewing the mandatory licensing conditions

Q19. Do you think each of the mandatory licensing conditions is effective in promoting the licensing objectives? For more information on the licensing objectives please see the glossary at the end of the full consultation document. Please select one option (Yes, No, Don't know) from each drop down menu.

	<b>Prevention of crime and disorder</b>	<b>Public safety</b>	<b>Prevention of public nuisance</b>	<b>Protection of children from harm</b>
<b>Irresponsible promotions</b>	Yes	Yes	Yes	Yes
<b>Dispensing alcohol directly into the mouth</b>	Yes	Yes	Yes	Yes
<b>Mandatory provision of free tap water</b>	Yes	Yes	Yes	Yes
<b>Age verification policy</b>	Yes	Yes	Yes	Yes
<b>Mandatory provision of small measures</b>	Yes	Yes	Yes	Yes

Score

0

Q20. Do you think that the mandatory licensing conditions do enough to

target irresponsible promotions in pubs and clubs? Please select one option.

No

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

Views have been expressed that a ban on multi-buy promotions could be extended. Concern has also been expressed as to how they are policed.

Score

0

Q21. Are there other issues related to the licensing objectives which could be tackled through a mandatory licensing condition? Please select one option.

Yes

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

Training re: under age sales and serving to individuals who are intoxicated.

Score

0

Q22. Do you think that 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.

No

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

Pre-loading in the off trade is a serious problem (not least for the on trade). Re-balancing this disparity could be achieved by applying other conditions to the off trade too.

Score

0

Page Score

0

## **Page 8: Health as a licensing objective for cumulative impact policies**

Q23. We want to ensure that licensing authorities are able to take alcohol-related health harms into consideration when making decisions about cumulative impact policies (CIPs) which can be used to manage problems linked to the density of premises in specific areas. 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. We are proposing 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. We expect that those areas with the highest levels of alcohol-related health harm, or fast rising levels of harm from alcohol, will be most likely to use this power. It 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. More information is available in the full consultation document and impact assessment. Do you want to answer questions on health as a licensing objective for cumulative impact policies? Please select one option.

Yes

Score

0

Page Score

0

## Page 9: Health as a licensing objective for cumulative impact policies

Q24. 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):

As detailed in the s182 Guidance:

- Local Community Safety Partnerships
- responsible authorities, an data sharing between them, eg police and health bodies
- local crime and disorder statistics, including statistics on specific types of crime and crime hotspots and correlation with health data
- statistics on local anti-social behaviour offences;
- health-related statistics such as alcohol-related emergency attendances and hospital admissions;
- environmental health complaints, particularly in relation to noise if it causes sleeplessness
- complaints recorded by the local authority, which may include complaints raised by local residents or residents' associations;
- residents' questionnaires;
- evidence from local councillors;
- evidence obtained through local consultation.

Q25. 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

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

Making the Guidance clearer to encourage collation of statistics on alcohol related health harms, and liason between the police and health bodies.

Make 'prevention of health harm' a licensing objective to put it on the same footing as the other four objectives, and to enable to health authorities who are now 'responsible authorities' following the Police and Social Responsibility Act 2011 coming in to force. Rather than just health harms to the drinkers, health harms to residents in areas of high density of alcohol licensed premises should be considered, and their views taken into account.

Score

0

Q26. 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 your answer in the box below, providing evidence to support your response (keeping your views to a maximum of 200 words):

There are already 3 CIPs in the local authority area, but it would give residents more of a voice to show concerns to their own health harms caused by alcohol related activity in their vicinity eg sleep deprivation, stress, safety.

Page Score

0

## Page 10: Freeing up responsible businesses

Q27. The government has committed to consult on giving licensing authorities greater freedom to take decisions that reflect the needs of their local community. Following the government's Red Tape Challenge in 2011, three areas of reform were specified: alcohol licensing for certain types of premises providing minimal alcohol sales, temporary event notices (TENs) and the licensing of late night refreshment. This section asks for views on these proposals and suggests further ways to reduce burdens on business. The proposals set out here can be seen alongside work undertaken by the Department for Culture, Media and Sport to remove unnecessary red tape from regulated entertainment. More information on each of these areas for reform is available in the full consultation document. There are five subjects covered in this section. They are: ancillary sales of alcohol occasional provision of licensable activities at community events an extension of the temporary event notice limit at individual premises late night refreshment, and further proposals to reduce burdens on business Do you want to answer questions on freeing up responsible businesses? Please select one option.

Yes

Score

0

Page Score

0

## Page 11: Freeing up responsible businesses

Q28. Ancillary sales of alcohol For many businesses, the sale of alcohol is only a small part of, or incidental to, their wider activities, and occurs alongside the provision of another product or service (which this

consultation refers to as an 'ancillary sale'). For example, a guesthouse might wish to provide wine to its guests with an evening meal or a complimentary bottle of wine in a guest's room, while a hairdresser might wish to offer clients a glass of wine. 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
<b>The provision should be limited to a specific list of certain types of business and the kinds of sales they make</b>			X
<b>The provision should be available to all businesses providing they meet certain qualification criteria to be an ancillary seller</b>		X	
<b>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 the above options</b>		X	

Score

0

Q29. If special provisions 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.

	Yes	No	Don't know
<b>Accommodation providers, providing alcohol alongside accommodation as part of the contract</b>		X	
<b>Hair and beauty salons, providing alcohol alongside a hair or beauty treatment</b>			X
<b>Florists, providing alcohol alongside the purchase of flowers</b>		X	
<b>Cultural organisations, such as theatres, cinemas and museums, providing alcohol alongside cultural events as part of the entry ticket</b>		X	
<b>Regular charitable events, providing alcohol as part of the wider occasion</b>			X

Score

0

Q30. 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 suggestions in the box below, keeping your views to a maximum of 200 words:

**No Response**

Q31. 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. Alternatively, a second option is to broaden the definition of 'ancillary sales' to include all businesses (and/or not for profit activities) through the use of a general set of qualification criteria, for example, to the effect that: alcohol must be sold or supplied as a small part or proportion of a sales transaction or contract for a wider service, and the amount of alcohol that could be supplied as part of that contract cannot exceed a prescribed amount. Do you think that the qualification criteria proposed meet this aim?

No

***Please use the space below to provide further comments (keeping your views to a maximum of 200 words):***

The Licensing Act 2003 is already permissive to the extent that if no representations are made, the licensing authority must grant the application, subject only to such conditions as are consistent with the operating schedule.

Score

0

Q32. 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
<b>Allow premises making ancillary sales to request in their premises licence application that the requirement for a personal licence holder be removed</b>			X
<b>Introduce a new, light-touch form of authorisation for premises making ancillary sales - an ASN but retaining the need for a personal licence holder</b>			X
<b>Introduce a new, light touch form of authorisation for premises making ancillary sales - an ASN - with no requirement for a personal licence holder</b>			X

Score

0

Q33. Do you think these proposals would impact adversely on one or more of the licensing objectives? Please select one option.

	Yes	No	Don't know
<b>Allow premises making ancillary sales to request in their premises licence application that the requirement for a personal licence holder be removed</b>	X		
<b>Introduce a new, light-touch form of authorisation for premises making ancillary sales - an ASN but retaining the need for a personal licence holder</b>	X		
<b>Introduce a new, light touch form of authorisation for premises making ancillary sales - an ASN - with no requirement for a personal licence holder</b>	X		

Score

0

Q34. 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 response to a maximum of 200 words:

The requirement for a personal licence holder ensures an element of accountability and consequently assist with enforcement.

Page Score

0

## Page 12: Freeing up responsible businesses

Q35. 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

Score

0

Q36. 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
<b>Reduce the burden</b>	X		
<b>Increase the burden</b>		X	

Score

0

Page Score

0

## Page 13: Freeing up responsible businesses

Q37. Should the number of TENS which can be given in respect of individual premises be increased? Please select one option.

No

Score

0

Q38. If you answered yes, please select one option to indicate which you would prefer. Please select one option.

*No Response*

Score

0

Page Score

0

## Page 14: Freeing up responsible businesses

Q39. 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
<b>Determining that premises in certain areas are exempt</b>			X
<b>Determining that certain premises types are exempt in their local area</b>			X

Score

0

Q40. 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

Score

0

Q41. 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).

*No Response*

Page Score

0

## Page 15: Freeing up responsible businesses

Q42. Do you agree with each of the following proposals? Please select one option in each row.

	Yes	No	Don't know
<b>Remove requirements to advertise licensing applications in local newspapers</b>		X	
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs for the on and off-trade</b>		X	
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs, but only in respect of overnight accommodation - lodges</b>			X
<b>Remove or simplify requirements to renew personal licences under the 2003 Act</b>		X	

Score

0

Q43. 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
<b>Remove requirements to advertise licensing applications in local newspapers</b>	X		
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs for the on and off-trade</b>	X		
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs, but only in respect of overnight accommodation - lodges</b>	X		
<b>Remove or simplify requirements to renew personal licences under the 2003 Act</b>	X		

Score

0

Q44. 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.

	Yes	No	Don't know
<b>Remove requirements to advertise licensing applications in local newspapers</b>	X		
<b>Remove the centrally imposed prohibition on the</b>	X		

<b>sale of alcohol at MSAs for the on and off-trade</b>			
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs, but only in respect of overnight accommodation - lodges</b>			X
<b>Remove or simplify requirements to renew personal licences under the 2003 Act</b>	X		

Score

0

Q45. 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 keep your views to a maximum of 200 words.)

It is not possible to say with certainty that they WOULD impact adversely, but there is potential that they COULD impact.

Page Score

0

## Page 16: Impact assessments

Q46. Impact assessments for the proposals in this consultation have been published alongside the full consultation document. 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
<b>Minimum unit pricing</b>			X
<b>Multi-buy promotions</b>			X
<b>Health as a licensing objective for cumulative impact</b>			X
<b>Ancillary sales of alcohol</b>			X
<b>Temporary event notices</b>			X
<b>Late night refreshment</b>			X
<b>Removing the duty to advertise licence applications in a local newspaper</b>			X
<b>Sales of alcohol at motorway service stations</b>			X

<b>Personal licences</b>			X
--------------------------	--	--	---

Score

0

Q47. Do you have any comments on the methodologies or assumptions used in the impact assessments? If yes, please specify in the box below, clearly referencing the impact assessment and page to which you refer (keeping your views to a maximum of 400 words).

*No Response*

Page Score

0

## Scoring Summary

Pages	Total
1. About you	0
2. A minimum unit price for alcohol	0
3. A minimum unit price for alcohol	0
4. A ban on multi-buy promotions in the off-trade	0
5. A ban on multi-buy promotions in the off-trade	0
6. Reviewing the mandatory licensing conditions	0
7. Reviewing the mandatory licensing conditions	0
8. Health as a licensing objective for cumulative impact policies	0
9. Health as a licensing objective for cumulative impact policies	0
10. Freeing up responsible businesses	0
11. Freeing up responsible businesses	0
12. Freeing up responsible businesses	0
13. Freeing up responsible businesses	0
14. Freeing up responsible businesses	0

15. Freeing up responsible businesses	0
16. Impact assessments	0
<b>Total Survey Score:</b>	<b>0</b>

# Alcohol strategy consultation

User Details - 5454089

**Date Started:** 04/02/2013 11:55:21    **Date Ended:** 04/02/2013 12:34:59

**Time taken:** 39 mins, 38 secs    **IP Address:** n/a

**Unique ID:** n/a

## Page 1: About you

Q1. Please select if you would like your response or personal details to be treated as confidential.

**No Response**

Score

0

Q2. Which of the following best describes you or the professional interest you represent? Please select one option from the menu below.

Voluntary and community organisation

***Please specify which organisation, licensing authority or police force you represent in the box below:***

This response has been discussed and approved by the Sussex Village Halls Advisory Group, representing volunteer run community buildings in Sussex, which is part of the charity Action in rural Sussex.

Score

0

Q3. If you are responding on behalf of an organisation or interest group, please write in the box below the number of members in your group or organisation.

272

Q4. How did you obtain the views of your members? Please explain in the box below keeping your response to a maximum of 100 words.

We provide an advisory service for community buildings in the two counties of East and West Sussex. This response has been informed by:

\* Regular contact with representatives - who have regularly asked for a higher TENs limit at workshops, conferences and through personal contact since the Licensing Act 2005 came into effect.

\* Discussion at a quarterly meeting of the Sussex VH Advisory Group, comprising reps of these organisations who are in contact with other halls in their districts

Q5. Please indicate in which region you or your organisation is based. Please select one option from the menu below.

South East England

Score

0

Q6. If you are responding as a member of the public, what is your gender?  
Please select one option.

*No Response*

Score

0

Q7. If you are responding as a member of the public, what is your age?  
Please select one option.

*No Response*

Score

0

Page Score

0

## Page 2: A minimum unit price for alcohol

Q8. In the alcohol strategy, the government committed to introducing a minimum unit price for alcohol in England and Wales. This consultation will contribute to the debate on the most appropriate price per unit and the mechanism by which, once set, minimum unit pricing would remain effective. It is also an opportunity for interested parties to raise other issues around minimum unit pricing. The purpose of minimum unit pricing is to reduce alcohol consumption, particularly by the most hazardous and harmful drinkers who tend to show a preference for the cheapest alcohol products. By doing so the government estimates there will be a reduction in the associated crime and health harms, especially the numbers of hospital admissions, alcohol-related deaths and alcohol-related crimes. Minimum unit pricing is not intended disproportionately to affect responsible drinkers or particular social groups but to reduce the availability of alcohol sold at very low or heavily discounted prices. More information (including the definitions of hazardous and harmful drinkers) is available in the full consultation document and the impact assessment. Do you want to answer questions on minimum unit pricing? Please select one option.

No

Score

0

Page Score

0

## Page 3: A minimum unit price for alcohol

Q9. The impact of minimum unit pricing will depend on the price per unit of alcohol. The government wants to ensure that the chosen price level is targeted and proportionate, whilst achieving a significant reduction of harm. The government is therefore consulting on the introduction of a recommended minimum unit price of 45p. The government estimates a reduction in consumption across all product types of 3.3 per cent, a

reduction in crime of 5,240 per year, a reduction in 24,600 alcohol-related hospital admissions and 714 fewer deaths per year after ten years. Do you agree that this minimum unit price level would achieve these aims? Please select one option.

*No Response*

Score

0

Q10. Should other factors or evidence be considered when setting a minimum unit price for alcohol? Please select one option.

*No Response*

Score

0

Q11. The government wishes to maintain the effectiveness of minimum unit pricing and is therefore proposing to adjust the minimum unit price level over time. How do you think the level of minimum unit price set by the government should be adjusted over time? Please select one option.

*No Response*

Score

0

Q12. 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.

*No Response*

Score

0

Page Score

0

## **Page 4: A ban on multi-buy promotions in the off-trade**

Q13. The government is consulting on introducing a ban on multi-buy promotions in the off-trade (e.g. shops and off-licences) as part of its wider strategy to reduce excessive alcohol consumption, and alongside the introduction of a minimum unit price. A ban on multi-buy promotions would therefore not apply to pubs, clubs, bars or restaurants. The term 'multi-buy promotions' refers to alcohol promotions that offer a discount for buying multiple items. 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. As well as being part of a wider strategy to reduce consumption and tackle irresponsible alcohol sales, a ban on multi-buy promotions would also contribute to the government's aim of encouraging people to be aware of how much they drink and the risks of excessive drinking, so that they can make informed choices. The aim of this

consultation is to assess support for such a ban and contribute to our understanding of the impact a ban on multi-buy promotions may have. The types of promotion it is proposed that a ban would include, are: two for the price of one, three for the price of two, buy one get one free, buy six and get 20 per cent off, 24 cans of lager costing less than 24 times the cost of a single 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, 3 for £10 where each bottle costs more than £3.33. More information is available in the full consultation document and the impact assessment. Do you want to answer questions on a ban on multi-buy promotions in the off-trade? Please select one option.

No

Score

0

Page Score

0

## Page 5: A ban on multi-buy promotions in the off-trade

Q14. Do you think there should be a ban on multi-buy promotions involving alcohol in the off-trade? Please select one option.

*No Response*

Score

0

Q15. Are there any further offers which should be included in a ban on multi-buy promotions? Please select one option.

*No Response*

Score

0

Q16. Should other factors or evidence be taken into account when considering a ban on multi-buy promotions? Please select one option.

*No Response*

Score

0

Q17. 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.

*No Response*

Score

0

Page Score

0

## Page 6: Reviewing the mandatory licensing conditions

Q18. 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 alcohol 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. The government has also committed to consult on whether these mandatory licensing conditions should, where relevant, apply to both the on- and off-trade. This consultation forms part of that review, and will contribute to the government's understanding of how these mandatory conditions are perceived. The five mandatory licensing conditions currently set out in regulations in relation to the supply of alcohol are: a ban on irresponsible promotions, a ban on dispensing alcohol by one person directly into the mouth of another, a requirement to provide free tap water on request to customers, a requirement to have an age verification policy to prevent the sale of alcohol to persons under 18 years of age, and a requirement to make available to customers small measures such as half pints or beer or cider or 125ml glasses of wine. More information is available in the full consultation document. An explanation of each of these terms can be found on page 20 of the consultation document, in the glossary at the end. Do you want to answer questions on reviewing the mandatory licensing conditions? Please select one option.

No

Score

0

Page Score

0

## Page 7: Reviewing the mandatory licensing conditions

Q19. Do you think each of the mandatory licensing conditions is effective in promoting the licensing objectives? For more information on the licensing objectives please see the glossary at the end of the full consultation document. Please select one option (Yes, No, Don't know) from each drop down menu.

*No Response*

Score

0

Q20. Do you think that the mandatory licensing conditions do enough to target irresponsible promotions in pubs and clubs? Please select one option.

*No Response*

Score

0

Q21. Are there other issues related to the licensing objectives which could be tackled through a mandatory licensing condition? Please select one option.

*No Response*

Score

0

Q22. Do you think that 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.

**No Response**

Score

0

Page Score

0

## **Page 8: Health as a licensing objective for cumulative impact policies**

Q23. We want to ensure that licensing authorities are able to take alcohol-related health harms into consideration when making decisions about cumulative impact policies (CIPs) which can be used to manage problems linked to the density of premises in specific areas. 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. We are proposing 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. We expect that those areas with the highest levels of alcohol-related health harm, or fast rising levels of harm from alcohol, will be most likely to use this power. It 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. More information is available in the full consultation document and impact assessment. Do you want to answer questions on health as a licensing objective for cumulative impact policies? Please select one option.

No

Score

0

Page Score

0

## **Page 9: Health as a licensing objective for cumulative impact policies**

Q24. 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):

*No Response*

Q25. 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.

*No Response*

Score

0

Q26. 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 your answer in the box below, providing evidence to support your response (keeping your views to a maximum of 200 words):

*No Response*

Page Score

0

## **Page 10: Freeing up responsible businesses**

Q27. The government has committed to consult on giving licensing authorities greater freedom to take decisions that reflect the needs of their local community. Following the government's Red Tape Challenge in 2011, three areas of reform were specified: alcohol licensing for certain types of premises providing minimal alcohol sales, temporary event notices (TENs) and the licensing of late night refreshment. This section asks for views on these proposals and suggests further ways to reduce burdens on business. The proposals set out here can be seen alongside work undertaken by the Department for Culture, Media and Sport to remove unnecessary red tape from regulated entertainment. More information on each of these areas for reform is available in the full consultation document. There are five subjects covered in this section. They are: ancillary sales of alcohol, occasional provision of licensable activities at community events, an extension of the temporary event notice limit at individual premises, late night refreshment, and further proposals to reduce burdens on business. Do you want to answer questions on freeing up responsible businesses? Please select one option.

Yes

Score

0

Page Score

0

## **Page 11: Freeing up responsible businesses**

Q28. Ancillary sales of alcohol For many businesses, the sale of alcohol is only a small part of, or incidental to, their wider activities, and occurs alongside the provision of another product or service (which this consultation refers to as an 'ancillary sale'). For example, a guesthouse might wish to provide wine to its guests with an evening meal or a complimentary bottle of wine in a guest's room, while a hairdresser might wish to offer clients a glass of wine. 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
<b>The provision should be limited to a specific list of certain types of business and the kinds of sales they make</b>			
<b>The provision should be available to all businesses providing they meet certain qualification criteria to be an ancillary seller</b>			
<b>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 the above options</b>	X		

Score

0

Q29. If special provisions 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.

	Yes	No	Don't know
<b>Accommodation providers, providing alcohol alongside accommodation as part of the contract</b>			X
<b>Hair and beauty salons, providing alcohol alongside a hair or beauty treatment</b>			X
<b>Florists, providing alcohol alongside the purchase of flowers</b>			X
<b>Cultural organisations, such as theatres, cinemas and museums, providing alcohol alongside cultural events as part of the entry ticket</b>	X		
<b>Regular charitable events, providing alcohol as part of the wider occasion</b>	X		

Score

0

Q30. 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 suggestions in the box below, keeping your views to a maximum of 200 words:

Suggest special provision should be limited by reference to time and amount of alcohol supplied to any one individual. For example, one or two units of alcohol per person, sold over a period of up to two hours, by a local community or voluntary organisation at a community event . This would allow provision of a glass of wine or beer at a lunch club for the elderly, an AGM, a "cheese and wine" fundraiser (avoiding misunderstandings over whether including a glass free in ticket price requires a licence), mulled wine at a xmas fair. For accomodation it could be 1 unit per customer on arrival or with evening meal.

Q31. 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. Alternatively, a second option is to broaden the definition of 'ancillary sales' to include all businesses (and/or not for profit activities) through the use of a general set of qualification criteria, for example, to the effect that: alcohol must be sold or supplied as a small part or proportion of a sales transaction or contract for a wider service, and the amount of alcohol that could be supplied as part of that contract cannot exceed a prescribed amount Do you think that the qualification criteria proposed meet this aim?

Yes

***Please use the space below to provide further comments (keeping your views to a maximum of 200 words):***

As above: We suggest special provision should be limited by reference to time and amount of alcohol supplied to any one individual. For example, one or two units of alcohol per person, sold over a period of up to two hours, by a local community or voluntary organisation at a community event . This would allow provision of a glass of wine or beer at a lunch club for the elderly, an AGM, a &quot;cheese and wine&quot; fundraiser (avoiding misunderstandings over whether including a glass free in ticket price requires a licence), mulled wine at a xmas fair. For accomodation it could be 1 unit per customer on arrival or with evening meal.

Score

0

Q32. 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
<b>Allow premises making ancillary sales to request in their premises licence application that the requirement for a personal licence holder be</b>	X		

<b>removed</b>			
<b>Introduce a new, light-touch form of authorisation for premises making ancillary sales - an ASN but retaining the need for a personal licence holder</b>		X	
<b>Introduce a new, light touch form of authorisation for premises making ancillary sales - an ASN - with no requirement for a personal licence holder</b>	X		

Score

0

Q33. Do you think these proposals would impact adversely on one or more of the licensing objectives? Please select one option.

	Yes	No	Don't know
<b>Allow premises making ancillary sales to request in their premises licence application that the requirement for a personal licence holder be removed</b>		X	
<b>Introduce a new, light-touch form of authorisation for premises making ancillary sales - an ASN but retaining the need for a personal licence holder</b>		X	
<b>Introduce a new, light touch form of authorisation for premises making ancillary sales - an ASN - with no requirement for a personal licence holder</b>		X	

Score

0

Q34. 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 response to a maximum of 200 words:

Many community organisations and community buildings do not hold a Premises Licence for sale of alcohol, only for entertainment, and previous dereg removes the requirement for a DPS/Personal Licence holder in certain cases. It would not remove regulation, if they each had to obtain an ASN instead of TENs for occasional events. A better route might be to allow for Premises Licences for Ent for Community Buildings to be varied to include ancillary sales at community events (not private parties/wedding receptions) without a Personal licence holder or TEN (an over-arching ASN if you like). Particular provision is needed for community premises which may be different to that for beauty salons etc.

Page Score

0

## Page 12: Freeing up responsible businesses

Q35. 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

Score

0

Q36. 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
Reduce the burden	X		
Increase the burden			

Score

0

Page Score

0

## Page 13: Freeing up responsible businesses

Q37. Should the number of TENs which can be given in respect of individual premises be increased? Please select one option.

Yes

Score

0

Q38. If you answered yes, please select one option to indicate which you would prefer. Please select one option.

18

Score

0

Page Score

0

## Page 14: Freeing up responsible businesses

Q39. 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
Determining that premises in certain areas are exempt	X		
Determining that certain premises types are exempt in their local area	X		

Score

0

Q40. 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

Score

0

Q41. 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).

Community Buildings on 31st December/1st January each year and on midsummers night for fundraising events (ie when fundraising events may exceed usual licensing hours).

Page Score

0

## Page 15: Freeing up responsible businesses

Q42. Do you agree with each of the following proposals? Please select one option in each row.

	Yes	No	Don't know
<b>Remove requirements to advertise licensing applications in local newspapers</b>			X
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs for the on and off-trade</b>			X
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs, but only in respect of overnight accommodation - lodges</b>			X
<b>Remove or simplify requirements to renew personal licences under the 2003 Act</b>	X		

Score

0

Q43. 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
<b>Remove requirements to advertise licensing applications in local newspapers</b>	X		
<b>Remove the centrally imposed prohibition on the</b>			X

<b>sale of alcohol at MSAs for the on and off-trade</b>			
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs, but only in respect of overnight accommodation - lodges</b>			X
<b>Remove or simplify requirements to renew personal licences under the 2003 Act</b>	X		

Score

0

Q44. 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.

	Yes	No	Don't know
<b>Remove requirements to advertise licensing applications in local newspapers</b>			X
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs for the on and off-trade</b>			X
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs, but only in respect of overnight accommodation - lodges</b>			X
<b>Remove or simplify requirements to renew personal licences under the 2003 Act</b>		X	

Score

0

Q45. 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 keep your views to a maximum of 200 words.)

1. We strongly support raising the TENs limit and limit on no of days for community buildings. 12 (15 days) is not enough where there is a thriving amateur dramatics group, or monthly lunch club, for example.
2. Small oversights by licensees (eg not updating a notice promptly) should not be an offence, unless it is not done promptly if reminded.
3. While we support reduction in red tape around Personal Licence Holders, ASNs, TENs, licensing authorities should retain power to "call in" and review where trouble or offences occur.
4. We support allowing licensing authorities freedom around TENs procedures, but HO needs to make clear to LAs that this is designed to reduce red tape and make things easier for community organisations:

Occasionally new LOs and police have not seen changes that way, have misinterpreted, causing anxiety for volunteers.

Page Score

0

## Page 16: Impact assessments

Q46. Impact assessments for the proposals in this consultation have been published alongside the full consultation document. 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
<b>Minimum unit pricing</b>			X
<b>Multi-buy promotions</b>			X
<b>Health as a licensing objective for cumulative impact</b>			X
<b>Ancillary sales of alcohol</b>	X		
<b>Temporary event notices</b>	X		
<b>Late night refreshment</b>	X		
<b>Removing the duty to advertise licence applications in a local newspaper</b>	X		
<b>Sales of alcohol at motorway service stations</b>			X
<b>Personal licences</b>	X		

Score

0

Q47. Do you have any comments on the methodologies or assumptions used in the impact assessments? If yes, please specify in the box below, clearly referencing the impact assessment and page to which you refer (keeping your views to a maximum of 400 words).

Re ancillary sales and TENs the impact on community organisations is different to that on businesses - potentially freeing up volunteers and fundraising, bringing the "fun" back into fundraising. (If you would like to use that phrase in your publicity please feel free and credit it to Action in rural Sussex). Thankyou

Page Score

0

## Scoring Summary

Pages	Total
1. About you	0
2. A minimum unit price for alcohol	0
3. A minimum unit price for alcohol	0
4. A ban on multi-buy promotions in the off-trade	0
5. A ban on multi-buy promotions in the off-trade	0
6. Reviewing the mandatory licensing conditions	0
7. Reviewing the mandatory licensing conditions	0
8. Health as a licensing objective for cumulative impact policies	0
9. Health as a licensing objective for cumulative impact policies	0
10. Freeing up responsible businesses	0
11. Freeing up responsible businesses	0
12. Freeing up responsible businesses	0
13. Freeing up responsible businesses	0
14. Freeing up responsible businesses	0
15. Freeing up responsible businesses	0
16. Impact assessments	0
<b>Total Survey Score:</b>	<b>0</b>

# Alcohol strategy consultation

User Details - 5454883

**Date Started:** 04/02/2013 13:05:07    **Date Ended:** 04/02/2013 13:18:34

**Time taken:** 13 mins, 27 secs    **IP Address:** n/a

**Unique ID:** n/a

## Page 1: About you

Q1. Please select if you would like your response or personal details to be treated as confidential.

Treat as confidential

Score

0

Q2. Which of the following best describes you or the professional interest you represent? Please select one option from the menu below.

Local government (other)

Score

0

Q3. If you are responding on behalf of an organisation or interest group, please write in the box below the number of members in your group or organisation.

*No Response*

Q4. How did you obtain the views of your members? Please explain in the box below keeping your response to a maximum of 100 words.

*No Response*

Q5. Please indicate in which region you or your organisation is based.

Please select one option from the menu below.

North West England

Score

0

Q6. If you are responding as a member of the public, what is your gender? Please select one option.

Male

Score

0

Q7. If you are responding as a member of the public, what is your age? Please select one option.

35-54

Score

0

Page Score

0

## Page 2: A minimum unit price for alcohol

Q8. In the alcohol strategy, the government committed to introducing a minimum unit price for alcohol in England and Wales. This consultation will contribute to the debate on the most appropriate price per unit and the mechanism by which, once set, minimum unit pricing would remain effective. It is also an opportunity for interested parties to raise other issues around minimum unit pricing. The purpose of minimum unit pricing is to reduce alcohol consumption, particularly by the most hazardous and harmful drinkers who tend to show a preference for the cheapest alcohol products. By doing so the government estimates there will be a reduction in the associated crime and health harms, especially the numbers of hospital admissions, alcohol-related deaths and alcohol-related crimes. Minimum unit pricing is not intended disproportionately to affect responsible drinkers or particular social groups but to reduce the availability of alcohol sold at very low or heavily discounted prices. More information (including the definitions of hazardous and harmful drinkers) is available in the full consultation document and the impact assessment. Do you want to answer questions on minimum unit pricing? Please select one option.

Yes

Score

0

Page Score

0

## Page 3: A minimum unit price for alcohol

Q9. The impact of minimum unit pricing will depend on the price per unit of alcohol. The government wants to ensure that the chosen price level is targeted and proportionate, whilst achieving a significant reduction of harm. The government is therefore consulting on the introduction of a recommended minimum unit price of 45p. The government estimates a reduction in consumption across all product types of 3.3 per cent, a reduction in crime of 5,240 per year, a reduction in 24,600 alcohol-related hospital admissions and 714 fewer deaths per year after ten years. Do you agree that this minimum unit price level would achieve these aims? Please select one option.

Yes

Score

0

Q10. Should other factors or evidence be considered when setting a minimum unit price for alcohol? Please select one option.

Yes

Score

0

Q11. The government wishes to maintain the effectiveness of minimum unit

pricing and is therefore proposing to adjust the minimum unit price level over time. 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

Score

0

Q12. 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

Score

0

Page Score

0

## **Page 4: A ban on multi-buy promotions in the off-trade**

Q13. The government is consulting on introducing a ban on multi-buy promotions in the off-trade (e.g. shops and off-licences) as part of its wider strategy to reduce excessive alcohol consumption, and alongside the introduction of a minimum unit price. A ban on multi-buy promotions would therefore not apply to pubs, clubs, bars or restaurants. The term 'multi-buy promotions' refers to alcohol promotions that offer a discount for buying multiple items. 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. As well as being part of a wider strategy to reduce consumption and tackle irresponsible alcohol sales, a ban on multi-buy promotions would also contribute to the government's aim of encouraging people to be aware of how much they drink and the risks of excessive drinking, so that they can make informed choices. The aim of this consultation is to assess support for such a ban and contribute to our understanding of the impact a ban on multi-buy promotions may have. The types of promotion it is proposed that a ban would include, are: two for the price of one, three for the price of two, buy one get one free, buy six and get 20 per cent off, 24 cans of lager costing less than 24 times the cost of a single 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, 3 for £10 where each bottle costs more than £3.33. More information is available in the full consultation document and the impact assessment. Do you want to answer questions on a ban on multi-buy promotions in the off-trade? Please select one option.

Yes

Score

0

Page Score

0

## Page 5: A ban on multi-buy promotions in the off-trade

Q14. Do you think there should be a ban on multi-buy promotions involving alcohol in the off-trade? Please select one option.

No

Score

0

Q15. Are there any further offers which should be included in a ban on multi-buy promotions? Please select one option.

Don't know

Score

0

Q16. Should other factors or evidence be taken into account when considering a ban on multi-buy promotions? Please select one option.

Yes

Score

0

Q17. 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

Score

0

Page Score

0

## Page 6: Reviewing the mandatory licensing conditions

Q18. 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 alcohol 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. The government has also committed to consult on whether these mandatory licensing conditions should, where relevant, apply to both the on- and off-trade. This consultation forms part of that review, and will contribute to the government's understanding of how these mandatory conditions are perceived. The five mandatory licensing conditions currently set out in regulations in relation to the supply of alcohol are: a ban on irresponsible promotionsa ban on dispensing alcohol by one person directly into the mouth of anothera requirement to provide free tap water on request to

customers a requirement to have an age verification policy to prevent the sale of alcohol to persons under 18 years of age, and a requirement to make available to customers small measures such as half pints or beer or cider or 125ml glasses of wine. More information is available in the full consultation document. An explanation of each of these terms can be found on page 20 of the consultation document, in the glossary at the end. Do you want to answer questions on reviewing the mandatory licensing conditions? Please select one option.

Yes

Score

0

Page Score

0

## Page 7: Reviewing the mandatory licensing conditions

Q19. Do you think each of the mandatory licensing conditions is effective in promoting the licensing objectives? For more information on the licensing objectives please see the glossary at the end of the full consultation document. Please select one option (Yes, No, Don't know) from each drop down menu.

	<b>Prevention of crime and disorder</b>	<b>Public safety</b>	<b>Prevention of public nuisance</b>	<b>Protection of children from harm</b>
<b>Irresponsible promotions</b>	Don't know	Don't know	Yes	Yes
<b>Dispensing alcohol directly into the mouth</b>	Don't know	Yes	Yes	Yes
<b>Mandatory provision of free tap water</b>	Yes	Yes	Don't know	No
<b>Age verification policy</b>	Yes	Yes	Yes	Yes
<b>Mandatory provision of small measures</b>	No	No	Don't know	Yes

Score

0

Q20. Do you think that the mandatory licensing conditions do enough to target irresponsible promotions in pubs and clubs? Please select one

option.

Yes

Score

0

Q21. Are there other issues related to the licensing objectives which could be tackled through a mandatory licensing condition? Please select one option.

Yes

Score

0

Q22. Do you think that 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.

No

Score

0

Page Score

0

## Page 8: Health as a licensing objective for cumulative impact policies

Q23. We want to ensure that licensing authorities are able to take alcohol-related health harms into consideration when making decisions about cumulative impact policies (CIPs) which can be used to manage problems linked to the density of premises in specific areas. 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. We are proposing 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. We expect that those areas with the highest levels of alcohol-related health harm, or fast rising levels of harm from alcohol, will be most likely to use this power. It 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. More information is available in the full consultation document and impact assessment. Do you want to answer questions on health as a licensing objective for cumulative impact policies? Please select one option.

Yes

Score

0

Page Score

0

## Page 9: Health as a licensing objective for cumulative impact policies

Q24. 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):

*No Response*

Q25. 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

Score

0

Q26. 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 your answer in the box below, providing evidence to support your response (keeping your views to a maximum of 200 words):

*No Response*

Page Score

0

## Page 10: Freeing up responsible businesses

Q27. The government has committed to consult on giving licensing authorities greater freedom to take decisions that reflect the needs of their local community. Following the government's Red Tape Challenge in 2011, three areas of reform were specified: alcohol licensing for certain types of premises providing minimal alcohol sales, temporary event notices (TENs) and the licensing of late night refreshment. This section asks for views on these proposals and suggests further ways to reduce burdens on business. The proposals set out here can be seen alongside work undertaken by the Department for Culture, Media and Sport to remove unnecessary red tape from regulated entertainment. More information on each of these areas for reform is available in the full consultation document. There are five subjects covered in this section. They are: ancillary sales of alcohol occasional provision of licensable activities at community events an extension of the temporary event notice limit at individual premises late night refreshment, and further proposals to reduce burdens on business Do you want to answer questions on freeing up responsible businesses? Please select one option.

Yes

Score

0

Page Score

0

## Page 11: Freeing up responsible businesses

Q28. Ancillary sales of alcohol For many businesses, the sale of alcohol is only a small part of, or incidental to, their wider activities, and occurs alongside the provision of another product or service (which this consultation refers to as an 'ancillary sale'). For example, a guesthouse might wish to provide wine to its guests with an evening meal or a complimentary bottle of wine in a guest's room, while a hairdresser might wish to offer clients a glass of wine. 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
<b>The provision should be limited to a specific list of certain types of business and the kinds of sales they make</b>	X		
<b>The provision should be available to all businesses providing they meet certain qualification criteria to be an ancillary seller</b>			X
<b>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 the above options</b>	X		

Score

0

Q29. If special provisions 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.

	Yes	No	Don't know
<b>Accommodation providers, providing alcohol alongside accommodation as part of the contract</b>		X	
<b>Hair and beauty salons, providing alcohol alongside a hair or beauty treatment</b>		X	
<b>Florists, providing alcohol alongside the purchase of flowers</b>		X	
<b>Cultural organisations, such as theatres, cinemas</b>			X

<b>and museums, providing alcohol alongside cultural events as part of the entry ticket</b>			
<b>Regular charitable events, providing alcohol as part of the wider occasion</b>		X	

Score

0

Q30. 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 suggestions in the box below, keeping your views to a maximum of 200 words:

*No Response*

Q31. 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. Alternatively, a second option is to broaden the definition of 'ancillary sales' to include all businesses (and/or not for profit activities) through the use of a general set of qualification criteria, for example, to the effect that: alcohol must be sold or supplied as a small part or proportion of a sales transaction or contract for a wider service, and the amount of alcohol that could be supplied as part of that contract cannot exceed a prescribed amount. Do you think that the qualification criteria proposed meet this aim?

Yes

Score

0

Q32. 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
<b>Allow premises making ancillary sales to request in their premises licence application that the requirement for a personal licence holder be removed</b>		X	
<b>Introduce a new, light-touch form of authorisation for premises making ancillary sales - an ASN but retaining the need for a personal licence holder</b>	X		
<b>Introduce a new, light touch form of authorisation for premises making ancillary sales - an ASN - with no requirement for a personal licence holder</b>		X	

Score

0

Q33. Do you think these proposals would impact adversely on one or more of the licensing objectives? Please select one option.

	Yes	No	Don't know
<b>Allow premises making ancillary sales to request in their premises licence application that the requirement for a personal licence holder be removed</b>		X	
<b>Introduce a new, light-touch form of authorisation for premises making ancillary sales - an ASN but retaining the need for a personal licence holder</b>	X		
<b>Introduce a new, light touch form of authorisation for premises making ancillary sales - an ASN - with no requirement for a personal licence holder</b>		X	

Score

0

Q34. 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 response to a maximum of 200 words:

*No Response*

Page Score

0

## Page 12: Freeing up responsible businesses

Q35. 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

Score

0

Q36. 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
<b>Reduce the burden</b>	X		
<b>Increase the burden</b>			

Score

0

Page Score

0

## Page 13: Freeing up responsible businesses

Q37. Should the number of TENs which can be given in respect of individual premises be increased? Please select one option.

No

Score

0

Q38. If you answered yes, please select one option to indicate which you would prefer. Please select one option.

*No Response*

Score

0

Page Score

0

## Page 14: Freeing up responsible businesses

Q39. 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
<b>Determining that premises in certain areas are exempt</b>		X	
<b>Determining that certain premises types are exempt in their local area</b>		X	

Score

0

Q40. 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

Score

0

Q41. 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).

*No Response*

Page Score

0

## Page 15: Freeing up responsible businesses

Q42. Do you agree with each of the following proposals? Please select one option in each row.

	Yes	No	Don't know

<b>Remove requirements to advertise licensing applications in local newspapers</b>		X	
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs for the on and off-trade</b>			X
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs, but only in respect of overnight accommodation - lodges</b>			X
<b>Remove or simplify requirements to renew personal licences under the 2003 Act</b>	X		
Score			

0

Q43. 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
<b>Remove requirements to advertise licensing applications in local newspapers</b>	X		
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs for the on and off-trade</b>	X		
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs, but only in respect of overnight accommodation - lodges</b>	X		
<b>Remove or simplify requirements to renew personal licences under the 2003 Act</b>	X		

Score

0

Q44. 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.

	Yes	No	Don't know
<b>Remove requirements to advertise licensing applications in local newspapers</b>	X		
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs for the on and off-trade</b>	X		
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs, but only in respect of overnight accommodation - lodges</b>			X

<b>sale of alcohol at MSAs, but only in respect of overnight accommodation - lodges</b>			
<b>Remove or simplify requirements to renew personal licences under the 2003 Act</b>			X

Score

0

Q45. 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 keep your views to a maximum of 200 words.)

*No Response*

Page Score

0

## Page 16: Impact assessments

Q46. Impact assessments for the proposals in this consultation have been published alongside the full consultation document. 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
<b>Minimum unit pricing</b>	X		
<b>Multi-buy promotions</b>			X
<b>Health as a licensing objective for cumulative impact</b>	X		
<b>Ancillary sales of alcohol</b>			X
<b>Temporary event notices</b>			X
<b>Late night refreshment</b>	X		
<b>Removing the duty to advertise licence applications in a local newspaper</b>	X		
<b>Sales of alcohol at motorway service stations</b>	X		
<b>Personal licences</b>	X		

Score

0

Q47. Do you have any comments on the methodologies or assumptions

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

*No Response*

Page Score

0

## Scoring Summary

Pages	Total
1. About you	0
2. A minimum unit price for alcohol	0
3. A minimum unit price for alcohol	0
4. A ban on multi-buy promotions in the off-trade	0
5. A ban on multi-buy promotions in the off-trade	0
6. Reviewing the mandatory licensing conditions	0
7. Reviewing the mandatory licensing conditions	0
8. Health as a licensing objective for cumulative impact policies	0
9. Health as a licensing objective for cumulative impact policies	0
10. Freeing up responsible businesses	0
11. Freeing up responsible businesses	0
12. Freeing up responsible businesses	0
13. Freeing up responsible businesses	0
14. Freeing up responsible businesses	0
15. Freeing up responsible businesses	0
16. Impact assessments	0
<b>Total Survey Score:</b>	<b>0</b>



# Alcohol strategy consultation

User Details - 5454309

**Date Started:** 04/02/2013 12:14:39 **Date Ended:** 04/02/2013 13:54:49

**Time taken:** 1 hr, 40 mins, 10 secs **IP Address:** n/a

**Unique ID:** n/a

## Page 1: About you

Q1. Please select if you would like your response or personal details to be treated as confidential.

**No Response**

Score

0

Q2. Which of the following best describes you or the professional interest you represent? Please select one option from the menu below.

Other

***Please specify which organisation, licensing authority or police force you represent in the box below:***

Self employed independent consultant & trainer, specialising in alcohol work

Score

0

Q3. If you are responding on behalf of an organisation or interest group, please write in the box below the number of members in your group or organisation.

**No Response**

Q4. How did you obtain the views of your members? Please explain in the box below keeping your response to a maximum of 100 words.

n/a

Q5. Please indicate in which region you or your organisation is based.

Please select one option from the menu below.

East Midlands

Score

0

Q6. If you are responding as a member of the public, what is your gender? Please select one option.

Male

Score

0

Q7. If you are responding as a member of the public, what is your age? Please select one option.

55-64

Score

0

Page Score

0

## Page 2: A minimum unit price for alcohol

Q8. In the alcohol strategy, the government committed to introducing a minimum unit price for alcohol in England and Wales. This consultation will contribute to the debate on the most appropriate price per unit and the mechanism by which, once set, minimum unit pricing would remain effective. It is also an opportunity for interested parties to raise other issues around minimum unit pricing. The purpose of minimum unit pricing is to reduce alcohol consumption, particularly by the most hazardous and harmful drinkers who tend to show a preference for the cheapest alcohol products. By doing so the government estimates there will be a reduction in the associated crime and health harms, especially the numbers of hospital admissions, alcohol-related deaths and alcohol-related crimes. Minimum unit pricing is not intended disproportionately to affect responsible drinkers or particular social groups but to reduce the availability of alcohol sold at very low or heavily discounted prices. More information (including the definitions of hazardous and harmful drinkers) is available in the full consultation document and the impact assessment. Do you want to answer questions on minimum unit pricing? Please select one option.

Yes

Score

0

Page Score

0

## Page 3: A minimum unit price for alcohol

Q9. The impact of minimum unit pricing will depend on the price per unit of alcohol. The government wants to ensure that the chosen price level is targeted and proportionate, whilst achieving a significant reduction of harm. The government is therefore consulting on the introduction of a recommended minimum unit price of 45p. The government estimates a reduction in consumption across all product types of 3.3 per cent, a reduction in crime of 5,240 per year, a reduction in 24,600 alcohol-related hospital admissions and 714 fewer deaths per year after ten years. Do you agree that this minimum unit price level would achieve these aims? Please select one option.

No

***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):***

The government proposition to adopt a MUP of 45p is too conservative. It pays insufficient attention to the evidence provided to NICE & similar

evidence to the Scottish Government (informing the recommendations in PH 24) that showed far greater health & benefits would accrue from a higher MUP. As Scotland have stated their intention to proceed with a MUP of 50p the 45p proposal makes no sense. Based on the SCHARR evidence my preference would be for a higher rate than 50p to optimise the benefits as rapidly as possible. Justifying the rise on health grounds in the UK would be a reasonable and arguable justification under European law.

Score

0

Q10. Should other factors or evidence be considered when setting a minimum unit price for alcohol? Please select one option.

Yes

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

The evidence on whether the heaviest drinkers would be deterred is mixed although even if their alcohol use were tethered back somewhat they might still be drinking at harmful levels. The penetration of alcohol treatment services into the in need dependent populations is limited by lack of resources and by failure to require front line professionals to implement guidance (e.g. MoCAM - NICE PH24) to screen & assess for alcohol problems. A centrally led uplift in funding for specialist alcohol treatment services, supplemented by provision for them to deliver local consultancy, training and support to front line professionals would mirror the success in expanding the scope and effectiveness of drug treatment achieved since the 1980's. A quick win would be achieved by changing the GP contract to include alcohol screening & brief advice / interventions as a requirement with a significant cost penalty should they choose to 'opt out'. This is a viable financial model to incentivise, given that recession and the need for NHS & other savings militates against paying more for doing alcohol work. An alternative would be a major rise in alcohol duty to achieve the same effect as MUP. The only reason this has not been recommended by NICE is that it is constitutionally outwith their remit to advise on general taxation which remains the preserve of the Treasury.

Score

0

Q11. The government wishes to maintain the effectiveness of minimum unit pricing and is therefore proposing to adjust the minimum unit price level over time. 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 automatically be updated in line with inflation each year

Score

0

Q12. 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

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

People on the lowest incomes who only purchase alcohol in off sales may be affected negatively. This would be the case with any rise in a regular outgoing and is already the case with cigarette duty escalation; fuel and travel prices etc. Redistribution of wealth and eradication of poverty is a wholly legitimate aim for government. Suppressing the price of beverage alcohol for the notional alleviation of the alcohol consuming poor is not a credible or effective means of achieving either of those laudable goals. Also, as it is the most disadvantaged who experience alcohol related harms at lower levels of consumption their needs would better be met by comprehensive policies aimed at increasing overall material wealth. As not all poorer people drink, using the argument that MUP affects some of the poor as a reason not to proceed is a flawed and bogus position.

Score

0

Page Score

0

## **Page 4: A ban on multi-buy promotions in the off-trade**

Q13. The government is consulting on introducing a ban on multi-buy promotions in the off-trade (e.g. shops and off-licences) as part of its wider strategy to reduce excessive alcohol consumption, and alongside the introduction of a minimum unit price. A ban on multi-buy promotions would therefore not apply to pubs, clubs, bars or restaurants. The term 'multi-buy promotions' refers to alcohol promotions that offer a discount for buying multiple items. 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. As well as being part of a wider strategy to reduce consumption and tackle irresponsible alcohol sales, a ban on multi-buy promotions would also contribute to the government's aim of encouraging people to be aware of how much they drink and the risks of excessive drinking, so that they can make informed choices. The aim of this consultation is to assess support for such a ban and contribute to our understanding of the impact a ban on multi-buy promotions may have. The types of promotion it is proposed that a ban would include, are: two for the price of one, three for the price of two, buy one get one free, buy six and get 20 per cent off, 24 cans of lager costing less than 24 times the cost of a single 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, 3 for £10 where each bottle costs more than £3.33. More information is available in the full consultation

document and the impact assessment. Do you want to answer questions on a ban on multi-buy promotions in the off-trade? Please select one option.

Yes

Score

0

Page Score

0

## Page 5: A ban on multi-buy promotions in the off-trade

Q14. Do you think there should be a ban on multi-buy promotions involving alcohol in the off-trade? Please select one option.

Yes

Score

0

Q15. Are there any further offers which should be included in a ban on multi-buy promotions? Please select one option.

Yes

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

Any sale below the actual cost of production. This should include the cost of production; packaging; promotion; distribution; warehousing; all taxes and duties; and any other costs. Alcohol should not be bundled into multi-buy promotions with other beverage, foodstuffs or any other goods (e.g. glassware).

Score

0

Q16. Should other factors or evidence be taken into account when considering a ban on multi-buy promotions? Please select one option.

Yes

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

Considering banning / restricting serial multi-buy offers e.g. coupons; bottle caps; proofs of purchase collection to obtain additional goods and services e.g. branded merchandise; access to concerts; discounts off other goods and services; obtaining any other goods and services at discounted prices or preferentially. The ban on promotions should be linked to advertising restrictions and review as recommended by NICE

Score

0

Q17. 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

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

Younger people; naïve drinkers; the alcohol industry uses the same claims as those now discredited and proven to be both false and knowingly falsely made in the Tobacco industries' international resistance to regulation. Tobacco apologists can be found making identical arguments against alcohol regulation whether or not they are known to be in the pay of the alcohol industry

Score

0

Page Score

0

## Page 6: Reviewing the mandatory licensing conditions

Q18. 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 alcohol 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. The government has also committed to consult on whether these mandatory licensing conditions should, where relevant, apply to both the on- and off-trade. This consultation forms part of that review, and will contribute to the government's understanding of how these mandatory conditions are perceived. The five mandatory licensing conditions currently set out in regulations in relation to the supply of alcohol are: a ban on irresponsible promotions a ban on dispensing alcohol by one person directly into the mouth of another a requirement to provide free tap water on request to customers a requirement to have an age verification policy to prevent the sale of alcohol to persons under 18 years of age, and a requirement to make available to customers small measures such as half pints or beer or cider or 125ml glasses of wine More information is available in the full consultation document. An explanation of each of these terms can be found on page 20 of the consultation document, in the glossary at the end. Do you want to answer questions on reviewing the mandatory licensing conditions? Please select one option.

Yes

Score

0

Page Score

0

## Page 7: Reviewing the mandatory licensing conditions

Q19. Do you think each of the mandatory licensing conditions is effective in promoting the licensing objectives? For more information on the licensing

objectives please see the glossary at the end of the full consultation document. Please select one option (Yes, No, Don't know) from each drop down menu.

	<b>Prevention of crime and disorder</b>	<b>Public safety</b>	<b>Prevention of public nuisance</b>	<b>Protection of children from harm</b>
<b>Irresponsible promotions</b>	Yes	Yes	Yes	Yes
<b>Dispensing alcohol directly into the mouth</b>	Yes	Yes	Yes	Yes
<b>Mandatory provision of free tap water</b>	Yes	Yes	Yes	Yes
<b>Age verification policy</b>	Yes	Yes	Yes	Yes
<b>Mandatory provision of small measures</b>	Yes	Yes	Yes	Yes

Score

0

Q20. Do you think that the mandatory licensing conditions do enough to target irresponsible promotions in pubs and clubs? Please select one option.

No

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

More resources devoted by PCCs to use existing powers to challenge licences and to close premises

Score

0

Q21. Are there other issues related to the licensing objectives which could be tackled through a mandatory licensing condition? Please select one option.

Yes

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

The licensing objectives (and this survey) fails to address the issue of individual and the Public Health as a legitimate licensing goal. The simple expedient of adding health to the licensing objectives and actively pursuing this, making appeals subject to a mediation process before further formal

action and increasing the cost of failed appeals (by guidance to routinely reimburse the full costs to the local authority when they are successful in legal enforcement action) would strengthen the process - making it less of a process of attrition where the deepest pockets tend to win out over local authority licensing officials

Score

0

Q22. Do you think that 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.

No

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

The off trade is the biggest source of supply to the kinds of drinking that cause most widespread disquiet and contribute to public disorder; anti-social behaviour; under age consumption etc. There is an application here for the 'polluter pays' principle.

Score

0

Page Score

0

## **Page 8: Health as a licensing objective for cumulative impact policies**

Q23. We want to ensure that licensing authorities are able to take alcohol-related health harms into consideration when making decisions about cumulative impact policies (CIPs) which can be used to manage problems linked to the density of premises in specific areas. 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. We are proposing 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. We expect that those areas with the highest levels of alcohol-related health harm, or fast rising levels of harm from alcohol, will be most likely to use this power. It 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. More information is available in the full consultation document and impact assessment. Do you want to answer questions on health as a licensing objective for cumulative impact policies? Please select one option.

Yes

Score

0

Page Score

0

## Page 9: Health as a licensing objective for cumulative impact policies

Q24. 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):

Local data on alcohol related health harms as well as local consumption data; other indices such as incidence & prevalence of domestic abuse; child abuse & neglect; alcohol related criminal convictions; local community data on perceived levels of alcohol related disorder and nuisance

Q25. 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

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

Strengthen the duty to consider cumulative impacts and add health considerations to the mix. Ensure the burden to establish a case where there would not be a cumulative impact rests with the applicants

Score

0

Q26. 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 your answer in the box below, providing evidence to support your response (keeping your views to a maximum of 200 words):

Inform the licensing process; enable more challenges and better planning and geographical distribution of licences - particularly off licences

Page Score

0

## Page 10: Freeing up responsible businesses

Q27. The government has committed to consult on giving licensing authorities greater freedom to take decisions that reflect the needs of their local community. Following the government's Red Tape Challenge in 2011, three areas of reform were specified: alcohol licensing for certain types of premises providing minimal alcohol sales, temporary event notices (TENs) and the licensing of late night refreshment. This section asks for views on these proposals and suggests further ways to reduce burdens on business. The proposals set out here can be seen alongside work undertaken by the Department for Culture, Media and Sport to remove unnecessary red tape from regulated entertainment. More information on each of these areas for

reform is available in the full consultation document. There are five subjects covered in this section. They are: ancillary sales of alcohol occasional provision of licensable activities at community events an extension of the temporary event notice limit at individual premises late night refreshment, and further proposals to reduce burdens on business Do you want to answer questions on freeing up responsible businesses? Please select one option.

Yes

Score

0

Page Score

0

## Page 11: Freeing up responsible businesses

Q28. Ancillary sales of alcohol For many businesses, the sale of alcohol is only a small part of, or incidental to, their wider activities, and occurs alongside the provision of another product or service (which this consultation refers to as an 'ancillary sale'). For example, a guesthouse might wish to provide wine to its guests with an evening meal or a complimentary bottle of wine in a guest's room, while a hairdresser might wish to offer clients a glass of wine. 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
<b>The provision should be limited to a specific list of certain types of business and the kinds of sales they make</b>		X	
<b>The provision should be available to all businesses providing they meet certain qualification criteria to be an ancillary seller</b>		X	
<b>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 the above options</b>		X	

Score

0

Q29. If special provisions 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.

	Yes	No	Don't know

<b>Accommodation providers, providing alcohol alongside accommodation as part of the contract</b>		X	
<b>Hair and beauty salons, providing alcohol alongside a hair or beauty treatment</b>		X	
<b>Florists, providing alcohol alongside the purchase of flowers</b>		X	
<b>Cultural organisations, such as theatres, cinemas and museums, providing alcohol alongside cultural events as part of the entry ticket</b>		X	
<b>Regular charitable events, providing alcohol as part of the wider occasion</b>		X	

Score

0

Q30. 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 suggestions in the box below, keeping your views to a maximum of 200 words:

**No Response**

Q31. 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. Alternatively, a second option is to broaden the definition of 'ancillary sales' to include all businesses (and/or not for profit activities) through the use of a general set of qualification criteria, for example, to the effect that: alcohol must be sold or supplied as a small part or proportion of a sales transaction or contract for a wider service, and the amount of alcohol that could be supplied as part of that contract cannot exceed a prescribed amount. Do you think that the qualification criteria proposed meet this aim?

No

***Please use the space below to provide further comments (keeping your views to a maximum of 200 words):***

All alcohol purchases should be separate; explicit and self-evidently at or above the MUP rate. Ancillary sales provisions are potentially a mechanism to avoid application of the MUP e.g. cheese & wine events where the consumption of alcohol by a particular individual is limited only by the available supply - in which case e.g. a £10 ticket could purchase a modicum / no food and 40 units of alcohol ( @ effective unit price of 25p ).

Score

0

Q32. 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
<b>Allow premises making ancillary sales to request in their premises licence application that the requirement for a personal licence holder be removed</b>		X	
<b>Introduce a new, light-touch form of authorisation for premises making ancillary sales - an ASN but retaining the need for a personal licence holder</b>		X	
<b>Introduce a new, light touch form of authorisation for premises making ancillary sales - an ASN - with no requirement for a personal licence holder</b>		X	

Score

0

Q33. Do you think these proposals would impact adversely on one or more of the licensing objectives? Please select one option.

	Yes	No	Don't know
<b>Allow premises making ancillary sales to request in their premises licence application that the requirement for a personal licence holder be removed</b>	X		
<b>Introduce a new, light-touch form of authorisation for premises making ancillary sales - an ASN but retaining the need for a personal licence holder</b>	X		
<b>Introduce a new, light touch form of authorisation for premises making ancillary sales - an ASN - with no requirement for a personal licence holder</b>	X		

Score

0

Q34. 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 response to a maximum of 200 words:

Alcohol licensing is a serious matter. so-called 'lighter touch authorisation' is the thin end of a wedge. Tesco is mainly a grocery / clothing supplier; they could argue their alcohol sales are 'ancillary' . This is a diversion and a dilution from the design of a concerted programme action to promote public health, save lives and as a consequence reduce government spending. Misguided calls to 'reduce red tape' in these circumstances are flawed;

regulation is necessary and should be clearly delineated - which will make enforcement easier (and cheaper). No exceptions.

Page Score

0

## Page 12: Freeing up responsible businesses

Q35. 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.

No

Score

0

Q36. 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
Reduce the burden		X	
Increase the burden		X	

Score

0

Page Score

0

## Page 13: Freeing up responsible businesses

Q37. Should the number of TENs which can be given in respect of individual premises be increased? Please select one option.

No

Score

0

Q38. If you answered yes, please select one option to indicate which you would prefer. Please select one option.

**No Response**

Score

0

Page Score

0

## Page 14: Freeing up responsible businesses

Q39. 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
Determining that premises in certain areas are	X		

<b>exempt</b>			
<b>Determining that certain premises types are exempt in their local area</b>	X		

Score

0

Q40. 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.

No

Score

0

Q41. 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).

None

Page Score

0

## Page 15: Freeing up responsible businesses

Q42. Do you agree with each of the following proposals? Please select one option in each row.

	Yes	No	Don't know
<b>Remove requirements to advertise licensing applications in local newspapers</b>		X	
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs for the on and off-trade</b>		X	
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs, but only in respect of overnight accommodation - lodges</b>		X	
<b>Remove or simplify requirements to renew personal licences under the 2003 Act</b>		X	

Score

0

Q43. 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
<b>Remove requirements to advertise licensing applications in local newspapers</b>		X	

<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs for the on and off-trade</b>		X	
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs, but only in respect of overnight accommodation - lodges</b>		X	
<b>Remove or simplify requirements to renew personal licences under the 2003 Act</b>		X	

Score

0

Q44. 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.

	Yes	No	Don't know
<b>Remove requirements to advertise licensing applications in local newspapers</b>	X		
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs for the on and off-trade</b>	X		
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs, but only in respect of overnight accommodation - lodges</b>	X		
<b>Remove or simplify requirements to renew personal licences under the 2003 Act</b>	X		

Score

0

Q45. 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 keep your views to a maximum of 200 words.)

Ensuring that the Act is properly and consistently enforced would make compliance clearer and reduce the burden of implementing the Act. Enforcement has public health as well as legal implications and consistent enforcement results in better standards across the industry as with food safety inspections.

Page Score

0

## Page 16: Impact assessments

Q46. Impact assessments for the proposals in this consultation have been

published alongside the full consultation document. 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
<b>Minimum unit pricing</b>	X		
<b>Multi-buy promotions</b>	X		
<b>Health as a licensing objective for cumulative impact</b>	X		
<b>Ancillary sales of alcohol</b>		X	
<b>Temporary event notices</b>		X	
<b>Late night refreshment</b>		X	
<b>Removing the duty to advertise licence applications in a local newspaper</b>	X		
<b>Sales of alcohol at motorway service stations</b>		X	
<b>Personal licences</b>		X	

Score

0

Q47. Do you have any comments on the methodologies or assumptions used in the impact assessments? If yes, please specify in the box below, clearly referencing the impact assessment and page to which you refer (keeping your views to a maximum of 400 words).

There was an appearance of an underlying presumption against regulation and enforcement of regulations in the impact assessments. Adequate enforcement of this legal drug is every bit as necessary as enforcement against illicit substances.

Page Score

0

## Scoring Summary

Pages	Total
1. About you	0
2. A minimum unit price for alcohol	0

3. A minimum unit price for alcohol	0
4. A ban on multi-buy promotions in the off-trade	0
5. A ban on multi-buy promotions in the off-trade	0
6. Reviewing the mandatory licensing conditions	0
7. Reviewing the mandatory licensing conditions	0
8. Health as a licensing objective for cumulative impact policies	0
9. Health as a licensing objective for cumulative impact policies	0
10. Freeing up responsible businesses	0
11. Freeing up responsible businesses	0
12. Freeing up responsible businesses	0
13. Freeing up responsible businesses	0
14. Freeing up responsible businesses	0
15. Freeing up responsible businesses	0
16. Impact assessments	0
<b>Total Survey Score:</b>	<b>0</b>

# Alcohol strategy consultation

---

User Details - 5455471

**Date Started:** 04/02/2013 14:07:42    **Date Ended:** 04/02/2013 14:23:42

**Time taken:** 16 mins, 0 secs    **IP Address:** n/a

**Unique ID:** n/a

---

## Page 1: About you

Q1. Please select if you would like your response or personal details to be treated as confidential.

*No Response*

Score

0

Q2. Which of the following best describes you or the professional interest you represent? Please select one option from the menu below.

Member of the public

Score

0

Q3. If you are responding on behalf of an organisation or interest group, please write in the box below the number of members in your group or organisation.

*No Response*

Q4. How did you obtain the views of your members? Please explain in the box below keeping your response to a maximum of 100 words.

*No Response*

Q5. Please indicate in which region you or your organisation is based. Please select one option from the menu below.

East Midlands

Score

0

Q6. If you are responding as a member of the public, what is your gender? Please select one option.

Male

Score

0

Q7. If you are responding as a member of the public, what is your age? Please select one option.

35-54

Score

0

Page Score

0

## Page 2: A minimum unit price for alcohol

Q8. In the alcohol strategy, the government committed to introducing a minimum unit price for alcohol in England and Wales. This consultation will contribute to the debate on the most appropriate price per unit and the mechanism by which, once set, minimum unit pricing would remain effective. It is also an opportunity for interested parties to raise other issues around minimum unit pricing. The purpose of minimum unit pricing is to reduce alcohol consumption, particularly by the most hazardous and harmful drinkers who tend to show a preference for the cheapest alcohol products. By doing so the government estimates there will be a reduction in the associated crime and health harms, especially the numbers of hospital admissions, alcohol-related deaths and alcohol-related crimes. Minimum unit pricing is not intended disproportionately to affect responsible drinkers or particular social groups but to reduce the availability of alcohol sold at very low or heavily discounted prices. More information (including the definitions of hazardous and harmful drinkers) is available in the full consultation document and the impact assessment. Do you want to answer questions on minimum unit pricing? Please select one option.

Yes

Score

0

Page Score

0

## Page 3: A minimum unit price for alcohol

Q9. The impact of minimum unit pricing will depend on the price per unit of alcohol. The government wants to ensure that the chosen price level is targeted and proportionate, whilst achieving a significant reduction of harm. The government is therefore consulting on the introduction of a recommended minimum unit price of 45p. The government estimates a reduction in consumption across all product types of 3.3 per cent, a reduction in crime of 5,240 per year, a reduction in 24,600 alcohol-related hospital admissions and 714 fewer deaths per year after ten years. Do you agree that this minimum unit price level would achieve these aims? Please select one option.

No

Score

0

Q10. Should other factors or evidence be considered when setting a minimum unit price for alcohol? Please select one option.

Yes

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

Reducing the price is not related to consumption. If a supermarket has a

special offer on petrol, I would not be inspired to drive further, just pleased at the reduction in costs!

Score

0

Q11. The government wishes to maintain the effectiveness of minimum unit pricing and is therefore proposing to adjust the minimum unit price level over time. 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

Score

0

Q12. 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

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

I believe that people who regularly consume to excess would continue to do so regardless of price. They would either go short on other items (which could have an impact on the wellbeing of others) or turn to crime, either by stealing the alcohol directly or obtaining money through other activity to purchase it. Alcohol is a drug. If you feel that you need to have it, then like other drugs, you will get it one way or another, regardless of price.

Score

0

Page Score

0

## **Page 4: A ban on multi-buy promotions in the off-trade**

Q13. The government is consulting on introducing a ban on multi-buy promotions in the off-trade (e.g. shops and off-licences) as part of its wider strategy to reduce excessive alcohol consumption, and alongside the introduction of a minimum unit price. A ban on multi-buy promotions would therefore not apply to pubs, clubs, bars or restaurants. The term 'multi-buy promotions' refers to alcohol promotions that offer a discount for buying multiple items. 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. As well as being part of a wider strategy to reduce consumption and tackle irresponsible alcohol sales, a ban on multi-buy promotions would also contribute to the government's aim of encouraging people to be aware of how much they drink and the risks of excessive drinking, so that they can make informed choices. The aim of this

consultation is to assess support for such a ban and contribute to our understanding of the impact a ban on multi-buy promotions may have. The types of promotion it is proposed that a ban would include, are: two for the price of one, three for the price of two, buy one get one free, buy six and get 20 per cent off, 24 cans of lager costing less than 24 times the cost of a single 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, 3 for £10 where each bottle costs more than £3.33. More information is available in the full consultation document and the impact assessment. Do you want to answer questions on a ban on multi-buy promotions in the off-trade? Please select one option.

Yes

Score

0

Page Score

0

## Page 5: A ban on multi-buy promotions in the off-trade

Q14. Do you think there should be a ban on multi-buy promotions involving alcohol in the off-trade? Please select one option.

No

Score

0

Q15. Are there any further offers which should be included in a ban on multi-buy promotions? Please select one option.

No

Score

0

Q16. Should other factors or evidence be taken into account when considering a ban on multi-buy promotions? Please select one option.

Yes

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

Buying in bulk has always been a recognised way to reduce cost. I regularly purchase 2 loaves of bread when they are on a similar offer to that described, but I don't then eat lots of bread... I freeze one of the loaves until it is required.

Score

0

Q17. 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

***If yes, please specify in the box below (keeping your views to a***

*maximum of 100 words):*

Those on low incomes would find it more difficult to enjoy a drink and may be tempted to go without other things to have their relaxation

Score

0

Page Score

0

## Page 6: Reviewing the mandatory licensing conditions

Q18. 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 alcohol 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. The government has also committed to consult on whether these mandatory licensing conditions should, where relevant, apply to both the on- and off-trade. This consultation forms part of that review, and will contribute to the government's understanding of how these mandatory conditions are perceived. The five mandatory licensing conditions currently set out in regulations in relation to the supply of alcohol are: a ban on irresponsible promotionsa ban on dispensing alcohol by one person directly into the mouth of anothera requirement to provide free tap water on request to customersa requirement to have an age verification policy to prevent the sale of alcohol to persons under 18 years of age, anda requirement to make available to customers small measures such as half pints or beer or cider or 125ml glasses of wine More information is available in the full consultation document. An explanation of each of these terms can be found on page 20 of the consultation document, in the glossary at the end. Do you want to answer questions on reviewing the mandatory licensing conditions? Please select one option.

No

Score

0

Page Score

0

## Page 7: Reviewing the mandatory licensing conditions

Q19. Do you think each of the mandatory licensing conditions is effective in promoting the licensing objectives? For more information on the licensing objectives please see the glossary at the end of the full consultation document. Please select one option (Yes, No, Don't know) from each drop down menu.

*No Response*

Score

0

Q20. Do you think that the mandatory licensing conditions do enough to target irresponsible promotions in pubs and clubs? Please select one option.

*No Response*

Score

0

Q21. Are there other issues related to the licensing objectives which could be tackled through a mandatory licensing condition? Please select one option.

*No Response*

Score

0

Q22. Do you think that 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.

*No Response*

Score

0

Page Score

0

## **Page 8: Health as a licensing objective for cumulative impact policies**

Q23. We want to ensure that licensing authorities are able to take alcohol-related health harms into consideration when making decisions about cumulative impact policies (CIPs) which can be used to manage problems linked to the density of premises in specific areas. 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. We are proposing 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. We expect that those areas with the highest levels of alcohol-related health harm, or fast rising levels of harm from alcohol, will be most likely to use this power. It 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. More information is available in the full consultation document and impact assessment. Do you want to answer questions on health as a licensing objective for cumulative impact policies? Please select one option.

No

Score

0

Page Score

0

## Page 9: Health as a licensing objective for cumulative impact policies

Q24. 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):

*No Response*

Q25. 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.

*No Response*

Score

0

Q26. 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 your answer in the box below, providing evidence to support your response (keeping your views to a maximum of 200 words):

*No Response*

Page Score

0

## Page 10: Freeing up responsible businesses

Q27. The government has committed to consult on giving licensing authorities greater freedom to take decisions that reflect the needs of their local community. Following the government's Red Tape Challenge in 2011, three areas of reform were specified: alcohol licensing for certain types of premises providing minimal alcohol sales, temporary event notices (TENs) and the licensing of late night refreshment. This section asks for views on these proposals and suggests further ways to reduce burdens on business. The proposals set out here can be seen alongside work undertaken by the Department for Culture, Media and Sport to remove unnecessary red tape from regulated entertainment. More information on each of these areas for reform is available in the full consultation document. There are five subjects covered in this section. They are: ancillary sales of alcohol occasional provision of licensable activities at community events an extension of the temporary event notice limit at individual premises late night refreshment, and further proposals to reduce burdens on business Do you want to answer questions on freeing up responsible businesses? Please select one option.

No

Score

0

Page Score

0

## Page 11: Freeing up responsible businesses

Q28. Ancillary sales of alcohol For many businesses, the sale of alcohol is only a small part of, or incidental to, their wider activities, and occurs alongside the provision of another product or service (which this consultation refers to as an 'ancillary sale'). For example, a guesthouse might wish to provide wine to its guests with an evening meal or a complimentary bottle of wine in a guest's room, while a hairdresser might wish to offer clients a glass of wine. 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.

*No Response*

Score

0

Q29. If special provisions 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.

*No Response*

Score

0

Q30. 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 suggestions in the box below, keeping your views to a maximum of 200 words:

*No Response*

Q31. 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. Alternatively, a second option is to broaden the definition of 'ancillary sales' to include all businesses (and/or not for profit activities) through the use of a general set of qualification criteria, for example, to the effect that: alcohol must be sold or supplied as a small part or proportion of a sales transaction or contract for a wider service, and the amount of alcohol that could be supplied as part of that contract cannot exceed a prescribed amount Do you think that the qualification criteria proposed meet this aim?

*No Response*

Score

0

Q32. Do you think that these proposals would significantly reduce the burdens on ancillary sellers? Please select one option in each row.

*No Response*

Score

0

Q33. Do you think these proposals would impact adversely on one or more of the licensing objectives? Please select one option.

*No Response*

Score

0

Q34. 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 response to a maximum of 200 words:

*No Response*

Page Score

0

## Page 12: Freeing up responsible businesses

Q35. 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.

*No Response*

Score

0

Q36. What impact do you think a locally determined notification would have on organisers of community events? Please select one option in each row.

*No Response*

Score

0

Page Score

0

## Page 13: Freeing up responsible businesses

Q37. Should the number of TENs which can be given in respect of individual premises be increased? Please select one option.

*No Response*

Score

0

Q38. If you answered yes, please select one option to indicate which you would prefer. Please select one option.

*No Response*

Score

0

Page Score

0

## Page 14: Freeing up responsible businesses

Q39. 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.

*No Response*

Score

0

Q40. 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.

*No Response*

Score

0

Q41. 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).

*No Response*

Page Score

0

## **Page 15: Freeing up responsible businesses**

Q42. Do you agree with each of the following proposals? Please select one option in each row.

*No Response*

Score

0

Q43. Do you think that each of the following would reduce the overall burdens on business? Please select one option in each row.

*No Response*

Score

0

Q44. 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.

*No Response*

Score

0

Q45. 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 keep your views to a maximum of 200 words.)

*No Response*

Page Score

0

## **Page 16: Impact assessments**

Q46. Impact assessments for the proposals in this consultation have been published alongside the full consultation document. 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
Minimum unit pricing			X
Multi-buy promotions			X
Health as a licensing objective for cumulative impact			X
Ancillary sales of alcohol			X
Temporary event notices			X
Late night refreshment			X
Removing the duty to advertise licence applications in a local newspaper			X
Sales of alcohol at motorway service stations			X
Personal licences			X

Score

0

Q47. Do you have any comments on the methodologies or assumptions used in the impact assessments? If yes, please specify in the box below, clearly referencing the impact assessment and page to which you refer (keeping your views to a maximum of 400 words).

*No Response*

Page Score

0

## Scoring Summary

Pages	Total
1. About you	0
2. A minimum unit price for alcohol	0
3. A minimum unit price for alcohol	0
4. A ban on multi-buy promotions in the off-trade	0
5. A ban on multi-buy promotions in the off-trade	0

6. Reviewing the mandatory licensing conditions	0
7. Reviewing the mandatory licensing conditions	0
8. Health as a licensing objective for cumulative impact policies	0
9. Health as a licensing objective for cumulative impact policies	0
10. Freeing up responsible businesses	0
11. Freeing up responsible businesses	0
12. Freeing up responsible businesses	0
13. Freeing up responsible businesses	0
14. Freeing up responsible businesses	0
15. Freeing up responsible businesses	0
16. Impact assessments	0
<b>Total Survey Score:</b>	0

# Alcohol strategy consultation

---

User Details - 5455060

**Date Started:** 04/02/2013 13:24:46    **Date Ended:** 04/02/2013 14:29:40

**Time taken:** 1 hr, 4 mins, 54 secs    **IP Address:** n/a

**Unique ID:** n/a

---

## Page 1: About you

Q1. Please select if you would like your response or personal details to be treated as confidential.

Treat as confidential

***Please provide your reasons in the box below:***

No need to treat as confidential - unable to untick the box!

Score

0

Q2. Which of the following best describes you or the professional interest you represent? Please select one option from the menu below.

Person or organisation specialising in licensing law

***Please specify which organisation, licensing authority or police force you represent in the box below:***

Trethowans LLP We represent a number of national operators, including several household names. We have invited them to give us their comments on the consultation as it affects their type of operation.

Score

0

Q3. If you are responding on behalf of an organisation or interest group, please write in the box below the number of members in your group or organisation.

***No Response***

Q4. How did you obtain the views of your members? Please explain in the box below keeping your response to a maximum of 100 words.

***No Response***

Q5. Please indicate in which region you or your organisation is based.

Please select one option from the menu below.

South East England

Score

0

Q6. If you are responding as a member of the public, what is your gender? Please select one option.

*No Response*

Score

0

Q7. If you are responding as a member of the public, what is your age?  
Please select one option.

*No Response*

Score

0

Page Score

0

## **Page 2: A minimum unit price for alcohol**

Q8. In the alcohol strategy, the government committed to introducing a minimum unit price for alcohol in England and Wales. This consultation will contribute to the debate on the most appropriate price per unit and the mechanism by which, once set, minimum unit pricing would remain effective. It is also an opportunity for interested parties to raise other issues around minimum unit pricing. The purpose of minimum unit pricing is to reduce alcohol consumption, particularly by the most hazardous and harmful drinkers who tend to show a preference for the cheapest alcohol products. By doing so the government estimates there will be a reduction in the associated crime and health harms, especially the numbers of hospital admissions, alcohol-related deaths and alcohol-related crimes. Minimum unit pricing is not intended disproportionately to affect responsible drinkers or particular social groups but to reduce the availability of alcohol sold at very low or heavily discounted prices. More information (including the definitions of hazardous and harmful drinkers) is available in the full consultation document and the impact assessment. Do you want to answer questions on minimum unit pricing? Please select one option.

No

Score

0

Page Score

0

## **Page 3: A minimum unit price for alcohol**

Q9. The impact of minimum unit pricing will depend on the price per unit of alcohol. The government wants to ensure that the chosen price level is targeted and proportionate, whilst achieving a significant reduction of harm. The government is therefore consulting on the introduction of a recommended minimum unit price of 45p. The government estimates a reduction in consumption across all product types of 3.3 per cent, a reduction in crime of 5,240 per year, a reduction in 24,600 alcohol-related hospital admissions and 714 fewer deaths per year after ten years. Do you agree that this minimum unit price level would achieve these aims? Please select one option.

*No Response*

Score

0

Q10. Should other factors or evidence be considered when setting a minimum unit price for alcohol? Please select one option.

*No Response*

Score

0

Q11. The government wishes to maintain the effectiveness of minimum unit pricing and is therefore proposing to adjust the minimum unit price level over time. How do you think the level of minimum unit price set by the government should be adjusted over time? Please select one option.

*No Response*

Score

0

Q12. 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.

*No Response*

Score

0

Page Score

0

## **Page 4: A ban on multi-buy promotions in the off-trade**

Q13. The government is consulting on introducing a ban on multi-buy promotions in the off-trade (e.g. shops and off-licences) as part of its wider strategy to reduce excessive alcohol consumption, and alongside the introduction of a minimum unit price. A ban on multi-buy promotions would therefore not apply to pubs, clubs, bars or restaurants. The term 'multi-buy promotions' refers to alcohol promotions that offer a discount for buying multiple items. 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. As well as being part of a wider strategy to reduce consumption and tackle irresponsible alcohol sales, a ban on multi-buy promotions would also contribute to the government's aim of encouraging people to be aware of how much they drink and the risks of excessive drinking, so that they can make informed choices. The aim of this consultation is to assess support for such a ban and contribute to our understanding of the impact a ban on multi-buy promotions may have. The types of promotion it is proposed that a ban would include, are: two for the price of one, three for the price of two, buy one get one free, buy six and get 20 per cent off, 24 cans of lager costing less than 24 times the cost of a single

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 for £10 where each bottle costs more than £3.33 More information is available in the full consultation document and the impact assessment. Do you want to answer questions on a ban on multi-buy promotions in the off-trade? Please select one option.

Yes

Score

0

Page Score

0

## Page 5: A ban on multi-buy promotions in the off-trade

Q14. Do you think there should be a ban on multi-buy promotions involving alcohol in the off-trade? Please select one option.

Yes

Score

0

Q15. Are there any further offers which should be included in a ban on multi-buy promotions? Please select one option.

No

Score

0

Q16. Should other factors or evidence be taken into account when considering a ban on multi-buy promotions? Please select one option.

No

Score

0

Q17. 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

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

May lead to crime reduction by reducing "front loading" before going out and entering on-licensed premises, having already drunk considerable amounts of low priced alcohol. Could reduce disturbance to residents and general reduction in crime and disorder. Possible increase in trade for the on-trade if the price of, for example, a bottle of wine, was comparable in on and off premises, economic benefit.

Score

0

Page Score

0

## Page 6: Reviewing the mandatory licensing conditions

Q18. 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 alcohol 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. The government has also committed to consult on whether these mandatory licensing conditions should, where relevant, apply to both the on- and off-trade. This consultation forms part of that review, and will contribute to the government's understanding of how these mandatory conditions are perceived. The five mandatory licensing conditions currently set out in regulations in relation to the supply of alcohol are: a ban on irresponsible promotions a ban on dispensing alcohol by one person directly into the mouth of another a requirement to provide free tap water on request to customers a requirement to have an age verification policy to prevent the sale of alcohol to persons under 18 years of age, and a requirement to make available to customers small measures such as half pints or beer or cider or 125ml glasses of wine More information is available in the full consultation document. An explanation of each of these terms can be found on page 20 of the consultation document, in the glossary at the end. Do you want to answer questions on reviewing the mandatory licensing conditions? Please select one option.

Yes

Score

0

Page Score

0

## Page 7: Reviewing the mandatory licensing conditions

Q19. Do you think each of the mandatory licensing conditions is effective in promoting the licensing objectives? For more information on the licensing objectives please see the glossary at the end of the full consultation document. Please select one option (Yes, No, Don't know) from each drop down menu.

	Prevention of crime and disorder	Public safety	Prevention of public nuisance	Protection of children from harm
Irresponsible promotions	-	-	-	-
Dispensing	Yes	-	-	-

<b>alcohol directly into the mouth</b>				
<b>Mandatory provision of free tap water</b>	Yes	-	-	-
<b>Age verification policy</b>	Yes	-	-	-
<b>Mandatory provision of small measures</b>	Yes	-	-	-

Score

0

Q20. Do you think that the mandatory licensing conditions do enough to target irresponsible promotions in pubs and clubs? Please select one option.

No

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

Not aware of many premises licence reviews or prosecutions as a result of these conditions. Very wordy, the first three are so specifically worded that they target a tiny proportion of the trade and are disproportionate to most premises licences. Age verification usually part of licensing authorities' policy in any event, unnecessary to duplicate as mandatory condition.

Score

0

Q21. Are there other issues related to the licensing objectives which could be tackled through a mandatory licensing condition? Please select one option.

**No Response**

Score

0

Q22. Do you think that 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.

No

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

A ban on multi buy offers, condition that alcohol should not be displayed at entrances to off licensed premises should be considered for the off trade

Score

0

Page Score

0

## Page 8: Health as a licensing objective for cumulative impact policies

Q23. We want to ensure that licensing authorities are able to take alcohol-related health harms into consideration when making decisions about cumulative impact policies (CIPs) which can be used to manage problems linked to the density of premises in specific areas. 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. We are proposing 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. We expect that those areas with the highest levels of alcohol-related health harm, or fast rising levels of harm from alcohol, will be most likely to use this power. It 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. More information is available in the full consultation document and impact assessment. Do you want to answer questions on health as a licensing objective for cumulative impact policies? Please select one option.

Yes

Score

0

Page Score

0

## Page 9: Health as a licensing objective for cumulative impact policies

Q24. 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):

How can any "evidence of alcohol related harm" be usefully included in a licensing policy? Whose "evidence" could be validly used, how would such "evidence" be applied to any individual application falling within a stress zone? Who would pay for any such "evidence" to be gathered, who would present it and use it to useful effect in applying the CIP?

Q25. 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.

No Response

Score

0

Q26. 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 your answer in the box below, providing evidence to support your response (keeping your views to a maximum of 200 words):

In any area, general "data" of this sort would merely lead to an even more cumbersome application and review process than is already in place. More hearings, with applicants presented with vague evidence of "alcohol related harm" - how is this defined? How would it be presented in respect of an individual premises, how would the applicant be expected to rebut vague, wide assertions that apply across an entire CIP zone? Expense, uncertainty, rising costs and increasing bureaucracy

Page Score

0

## Page 10: Freeing up responsible businesses

Q27. The government has committed to consult on giving licensing authorities greater freedom to take decisions that reflect the needs of their local community. Following the government's Red Tape Challenge in 2011, three areas of reform were specified: alcohol licensing for certain types of premises providing minimal alcohol sales, temporary event notices (TENs) and the licensing of late night refreshment. This section asks for views on these proposals and suggests further ways to reduce burdens on business. The proposals set out here can be seen alongside work undertaken by the Department for Culture, Media and Sport to remove unnecessary red tape from regulated entertainment. More information on each of these areas for reform is available in the full consultation document. There are five subjects covered in this section. They are: ancillary sales of alcohol occasional provision of licensable activities at community events an extension of the temporary event notice limit at individual premises late night refreshment, and further proposals to reduce burdens on business Do you want to answer questions on freeing up responsible businesses? Please select one option.

Yes

Score

0

Page Score

0

## Page 11: Freeing up responsible businesses

Q28. Ancillary sales of alcohol For many businesses, the sale of alcohol is only a small part of, or incidental to, their wider activities, and occurs alongside the provision of another product or service (which this consultation refers to as an 'ancillary sale'). For example, a guesthouse might wish to provide wine to its guests with an evening meal or a complimentary bottle of wine in a guest's room, while a hairdresser might wish to offer clients a glass of wine. 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
<b>The provision should be limited to a specific list of certain types of business and the kinds of sales they make</b>		X	
<b>The provision should be available to all businesses providing they meet certain qualification criteria to be an ancillary seller</b>	X		
<b>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 the above options</b>	X		

Score

0

Q29. If special provisions 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.

	Yes	No	Don't know
<b>Accommodation providers, providing alcohol alongside accommodation as part of the contract</b>		X	
<b>Hair and beauty salons, providing alcohol alongside a hair or beauty treatment</b>	X		
<b>Florists, providing alcohol alongside the purchase of flowers</b>		X	
<b>Cultural organisations, such as theatres, cinemas and museums, providing alcohol alongside cultural events as part of the entry ticket</b>		X	
<b>Regular charitable events, providing alcohol as part of the wider occasion</b>		X	

Score

0

Q30. 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 suggestions in the box below, keeping your views to a maximum of 200 words:

Any relaxation should be very carefully worded to allow minimal provision of alcohol - eg, a hotel/b&b may provide full restaurant facilities which should be governed by a premises licence in the same way as a restaurant, in contrast to a b&b merely giving away a glass of wine. It would be impossible to compile a sensible list of types of businesses - and constant amendment to the list would lead to uncertainty.

Q31. 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. Alternatively, a second option is to broaden the definition of 'ancillary sales' to include all businesses (and/or not for profit activities) through the use of a general set of qualification criteria, for example, to the effect that: alcohol must be sold or supplied as a small part or proportion of a sales transaction or contract for a wider service, and the amount of alcohol that could be supplied as part of that contract cannot exceed a prescribed amount. Do you think that the qualification criteria proposed meet this aim?

No

***Please use the space below to provide further comments (keeping your views to a maximum of 200 words):***

Define 'small part' - who is going to calculate this on a transaction by transaction basis? The law governing garage forecourt shop operators should be considered when considering such provisions

Score

0

Q32. 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
<b>Allow premises making ancillary sales to request in their premises licence application that the requirement for a personal licence holder be removed</b>		X	
<b>Introduce a new, light-touch form of authorisation for premises making ancillary sales - an ASN but retaining the need for a personal licence holder</b>	X		
<b>Introduce a new, light touch form of authorisation for premises making ancillary sales - an ASN - with no requirement for a personal licence holder</b>		X	

Score

0

Q33. Do you think these proposals would impact adversely on one or more of the licensing objectives? Please select one option.

	Yes	No	Don't know
<b>Allow premises making ancillary sales to request in their premises licence application that the requirement for a personal licence holder be removed</b>	X		
<b>Introduce a new, light-touch form of authorisation for premises making ancillary sales - an ASN but retaining the need for a personal licence holder</b>	X		
<b>Introduce a new, light touch form of authorisation for premises making ancillary sales - an ASN - with no requirement for a personal licence holder</b>	X		

Score

0

Q34. 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 response to a maximum of 200 words:

There is no point having a premises licence if no one at the premises knows anything about how it is operated! There would be no control of sales of alcohol if there is no premises licence - the police and authorities would not be aware that sales were taking place.

Make the personal licence holder application process more stringent and reduce the 10 year renewal timescale to 5 years. Introduce a requirement for personal licence holders to be registered with the local licensing authority, with regular visits and monitoring of their premises by the authorities

Page Score

0

## Page 12: Freeing up responsible businesses

Q35. 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.

No

Score

0

Q36. 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
--	-----	----	------------

<b>Reduce the burden</b>		X	
<b>Increase the burden</b>	X		

Score

0

Page Score

0

## Page 13: Freeing up responsible businesses

Q37. Should the number of TENs which can be given in respect of individual premises be increased? Please select one option.

Yes

Score

0

Q38. If you answered yes, please select one option to indicate which you would prefer. Please select one option.

18

Score

0

Page Score

0

## Page 14: Freeing up responsible businesses

Q39. 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
<b>Determining that premises in certain areas are exempt</b>		X	
<b>Determining that certain premises types are exempt in their local area</b>		X	

Score

0

Q40. 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

Score

0

Q41. 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).

All premises should continue to be subject to cregulation - the impact on the licensing objectives, and disturbance, noise, littering issues should be

considered. Local residents should continue to be given the opportunity of making representations/objections.

Page Score

0

## Page 15: Freeing up responsible businesses

Q42. Do you agree with each of the following proposals? Please select one option in each row.

	Yes	No	Don't know
<b>Remove requirements to advertise licensing applications in local newspapers</b>	X		
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs for the on and off-trade</b>	X		
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs, but only in respect of overnight accommodation - lodges</b>		X	
<b>Remove or simplify requirements to renew personal licences under the 2003 Act</b>		X	

Score

0

Q43. 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
<b>Remove requirements to advertise licensing applications in local newspapers</b>	X		
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs for the on and off-trade</b>	X		
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs, but only in respect of overnight accommodation - lodges</b>	X		
<b>Remove or simplify requirements to renew personal licences under the 2003 Act</b>	X		

Score

0

Q44. 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.

	Yes	No	Don't know
<b>Remove requirements to advertise licensing applications in local newspapers</b>		X	
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs for the on and off-trade</b>	X		
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs, but only in respect of overnight accommodation - lodges</b>	X		
<b>Remove or simplify requirements to renew personal licences under the 2003 Act</b>		X	

Score

0

Q45. 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 keep your views to a maximum of 200 words.)

Annual fee payment procedure. The LA 2003 gave an opportunity to standardise procedures, forms, processes, but each authority has introduced its own procedures which imposes a huge burden on national operators trying to deal with all the different councils around the country, all of whom have different accounting systems, departments dealing with fees, timescales etc. Annual fees should be payable for all premises on a set date, as under LA 1964 - and licensing authorities should be required to operate a nationally standardised system of fee collection and to monitor and process such payments adequately. The system currently in force has become far more burdensome for operators, particularly following the introduction of the mandatory suspension provision.

Page Score

0

## Page 16: Impact assessments

Q46. Impact assessments for the proposals in this consultation have been published alongside the full consultation document. 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.

**No Response**

Score

0

Q47. Do you have any comments on the methodologies or assumptions used in the impact assessments? If yes, please specify in the box below,

clearly referencing the impact assessment and page to which you refer (keeping your views to a maximum of 400 words).

*No Response*

Page Score

0

## Scoring Summary

Pages	Total
1. About you	0
2. A minimum unit price for alcohol	0
3. A minimum unit price for alcohol	0
4. A ban on multi-buy promotions in the off-trade	0
5. A ban on multi-buy promotions in the off-trade	0
6. Reviewing the mandatory licensing conditions	0
7. Reviewing the mandatory licensing conditions	0
8. Health as a licensing objective for cumulative impact policies	0
9. Health as a licensing objective for cumulative impact policies	0
10. Freeing up responsible businesses	0
11. Freeing up responsible businesses	0
12. Freeing up responsible businesses	0
13. Freeing up responsible businesses	0
14. Freeing up responsible businesses	0
15. Freeing up responsible businesses	0
16. Impact assessments	0
<b>Total Survey Score:</b>	<b>0</b>

# Alcohol strategy consultation

User Details - 5456036

**Date Started:** 04/02/2013 14:53:16    **Date Ended:** 04/02/2013 15:11:35

**Time taken:** 18 mins, 19 secs    **IP Address:** n/a

**Unique ID:** n/a

## Page 1: About you

Q1. Please select if you would like your response or personal details to be treated as confidential.

*No Response*

Score

0

Q2. Which of the following best describes you or the professional interest you represent? Please select one option from the menu below.

Member of the public

Score

0

Q3. If you are responding on behalf of an organisation or interest group, please write in the box below the number of members in your group or organisation.

*No Response*

Q4. How did you obtain the views of your members? Please explain in the box below keeping your response to a maximum of 100 words.

*No Response*

Q5. Please indicate in which region you or your organisation is based. Please select one option from the menu below.

*No Response*

Score

0

Q6. If you are responding as a member of the public, what is your gender? Please select one option.

Female

Score

0

Q7. If you are responding as a member of the public, what is your age? Please select one option.

35-54

Score

0

Page Score

0

## Page 2: A minimum unit price for alcohol

Q8. In the alcohol strategy, the government committed to introducing a minimum unit price for alcohol in England and Wales. This consultation will contribute to the debate on the most appropriate price per unit and the mechanism by which, once set, minimum unit pricing would remain effective. It is also an opportunity for interested parties to raise other issues around minimum unit pricing. The purpose of minimum unit pricing is to reduce alcohol consumption, particularly by the most hazardous and harmful drinkers who tend to show a preference for the cheapest alcohol products. By doing so the government estimates there will be a reduction in the associated crime and health harms, especially the numbers of hospital admissions, alcohol-related deaths and alcohol-related crimes. Minimum unit pricing is not intended disproportionately to affect responsible drinkers or particular social groups but to reduce the availability of alcohol sold at very low or heavily discounted prices. More information (including the definitions of hazardous and harmful drinkers) is available in the full consultation document and the impact assessment. Do you want to answer questions on minimum unit pricing? Please select one option.

Yes

Score

0

Page Score

0

## Page 3: A minimum unit price for alcohol

Q9. The impact of minimum unit pricing will depend on the price per unit of alcohol. The government wants to ensure that the chosen price level is targeted and proportionate, whilst achieving a significant reduction of harm. The government is therefore consulting on the introduction of a recommended minimum unit price of 45p. The government estimates a reduction in consumption across all product types of 3.3 per cent, a reduction in crime of 5,240 per year, a reduction in 24,600 alcohol-related hospital admissions and 714 fewer deaths per year after ten years. Do you agree that this minimum unit price level would achieve these aims? Please select one option.

Yes

Score

0

Q10. Should other factors or evidence be considered when setting a minimum unit price for alcohol? Please select one option.

Yes

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

Raising the average age at which young people start drinking

Score

0

Q11. The government wishes to maintain the effectiveness of minimum unit pricing and is therefore proposing to adjust the minimum unit price level over time. 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 automatically be updated in line with inflation each year

Score

0

Q12. 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.

No

Score

0

Page Score

0

## Page 4: A ban on multi-buy promotions in the off-trade

Q13. The government is consulting on introducing a ban on multi-buy promotions in the off-trade (e.g. shops and off-licences) as part of its wider strategy to reduce excessive alcohol consumption, and alongside the introduction of a minimum unit price. A ban on multi-buy promotions would therefore not apply to pubs, clubs, bars or restaurants. The term 'multi-buy promotions' refers to alcohol promotions that offer a discount for buying multiple items. 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. As well as being part of a wider strategy to reduce consumption and tackle irresponsible alcohol sales, a ban on multi-buy promotions would also contribute to the government's aim of encouraging people to be aware of how much they drink and the risks of excessive drinking, so that they can make informed choices. The aim of this consultation is to assess support for such a ban and contribute to our understanding of the impact a ban on multi-buy promotions may have. The types of promotion it is proposed that a ban would include, are: two for the price of one, three for the price of two, buy one get one free, buy six and get 20 per cent off, 24 cans of lager costing less than 24 times the cost of a single 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, 3 for £10 where each bottle costs more than £3.33. More information is available in the full consultation document and the impact assessment. Do you want to answer questions

on a ban on multi-buy promotions in the off-trade? Please select one option.

Yes

Score

0

Page Score

0

## Page 5: A ban on multi-buy promotions in the off-trade

Q14. Do you think there should be a ban on multi-buy promotions involving alcohol in the off-trade? Please select one option.

Yes

Score

0

Q15. Are there any further offers which should be included in a ban on multi-buy promotions? Please select one option.

Yes

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

Yes, ban all special offers and promotions on alcohol, much as with tobacco

Score

0

Q16. Should other factors or evidence be taken into account when considering a ban on multi-buy promotions? Please select one option.

No

Score

0

Q17. 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.

No

Score

0

Page Score

0

## Page 6: Reviewing the mandatory licensing conditions

Q18. 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 alcohol 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. The government has also committed to consult on whether these mandatory licensing conditions should, where relevant, apply to both the on-

and off-trade. This consultation forms part of that review, and will contribute to the government's understanding of how these mandatory conditions are perceived. The five mandatory licensing conditions currently set out in regulations in relation to the supply of alcohol are: a ban on irresponsible promotionsa ban on dispensing alcohol by one person directly into the mouth of anothera requirement to provide free tap water on request to customersa requirement to have an age verification policy to prevent the sale of alcohol to persons under 18 years of age, anda requirement to make available to customers small measures such as half pints or beer or cider or 125ml glasses of wine More information is available in the full consultation document. An explanation of each of these terms can be found on page 20 of the consultation document, in the glossary at the end. Do you want to answer questions on reviewing the mandatory licensing conditions? Please select one option.

Yes

Score

0

Page Score

0

## Page 7: Reviewing the mandatory licensing conditions

Q19. Do you think each of the mandatory licensing conditions is effective in promoting the licensing objectives? For more information on the licensing objectives please see the glossary at the end of the full consultation document. Please select one option (Yes, No, Don't know) from each drop down menu.

	Prevention of crime and disorder	Public safety	Prevention of public nuisance	Protection of children from harm
<b>Irresponsible promotions</b>	No	No	No	Don't know
<b>Dispensing alcohol directly into the mouth</b>	Don't know	Don't know	Don't know	Don't know
<b>Mandatory provision of free tap water</b>	Don't know	Don't know	Don't know	Don't know
<b>Age verification policy</b>	Yes	Yes	Yes	Yes
<b>Mandatory</b>	Don't know	Don't	Don't know	Don't know

<b>provision of small measures</b>		know		
------------------------------------	--	------	--	--

Score

0

Q20. Do you think that the mandatory licensing conditions do enough to target irresponsible promotions in pubs and clubs? Please select one option.

No

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

Ban on 'happy hours' Ensure provision of soft drinks at lower prices than alcoholic ones

Score

0

Q21. Are there other issues related to the licensing objectives which could be tackled through a mandatory licensing condition? Please select one option.

Don't know

Score

0

Q22. Do you think that 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.

No

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

Far more people drink at home now - there needs to be much more regulation of off-sales

Score

0

Page Score

0

## **Page 8: Health as a licensing objective for cumulative impact policies**

Q23. We want to ensure that licensing authorities are able to take alcohol-related health harms into consideration when making decisions about cumulative impact policies (CIPs) which can be used to manage problems linked to the density of premises in specific areas. 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. We are

proposing 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. We expect that those areas with the highest levels of alcohol-related health harm, or fast rising levels of harm from alcohol, will be most likely to use this power. It 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. More information is available in the full consultation document and impact assessment. Do you want to answer questions on health as a licensing objective for cumulative impact policies? Please select one option.

Yes

Score

0

Page Score

0

## Page 9: Health as a licensing objective for cumulative impact policies

Q24. 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):

*No Response*

Q25. 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.

Don't know

Score

0

Q26. 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 your answer in the box below, providing evidence to support your response (keeping your views to a maximum of 200 words):

*No Response*

Page Score

0

## Page 10: Freeing up responsible businesses

Q27. The government has committed to consult on giving licensing authorities greater freedom to take decisions that reflect the needs of their local community. Following the government's Red Tape Challenge in 2011, three areas of reform were specified: alcohol licensing for certain types of premises providing minimal alcohol sales, temporary event notices (TENs) and the licensing of late night refreshment. This section asks for views on these proposals and suggests further ways to reduce burdens on business.

The proposals set out here can be seen alongside work undertaken by the Department for Culture, Media and Sport to remove unnecessary red tape from regulated entertainment. More information on each of these areas for reform is available in the full consultation document. There are five subjects covered in this section. They are: ancillary sales of alcohol, occasional provision of licensable activities at community events, an extension of the temporary event notice limit at individual premises, late night refreshment, and further proposals to reduce burdens on business. Do you want to answer questions on freeing up responsible businesses? Please select one option.

Yes

Score

0

Page Score

0

## Page 11: Freeing up responsible businesses

Q28. Ancillary sales of alcohol. For many businesses, the sale of alcohol is only a small part of, or incidental to, their wider activities, and occurs alongside the provision of another product or service (which this consultation refers to as an 'ancillary sale'). For example, a guesthouse might wish to provide wine to its guests with an evening meal or a complimentary bottle of wine in a guest's room, while a hairdresser might wish to offer clients a glass of wine. 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
<b>The provision should be limited to a specific list of certain types of business and the kinds of sales they make</b>			
<b>The provision should be available to all businesses providing they meet certain qualification criteria to be an ancillary seller</b>			
<b>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 the above options</b>	X		

Score

0

Q29. If special provisions 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.

	Yes	No	Don't know
<b>Accommodation providers, providing alcohol alongside accommodation as part of the contract</b>	X		
<b>Hair and beauty salons, providing alcohol alongside a hair or beauty treatment</b>		X	
<b>Florists, providing alcohol alongside the purchase of flowers</b>		X	
<b>Cultural organisations, such as theatres, cinemas and museums, providing alcohol alongside cultural events as part of the entry ticket</b>		X	
<b>Regular charitable events, providing alcohol as part of the wider occasion</b>	X		

Score

0

Q30. 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 suggestions in the box below, keeping your views to a maximum of 200 words:

*No Response*

Q31. 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. Alternatively, a second option is to broaden the definition of 'ancillary sales' to include all businesses (and/or not for profit activities) through the use of a general set of qualification criteria, for example, to the effect that: alcohol must be sold or supplied as a small part or proportion of a sales transaction or contract for a wider service, and the amount of alcohol that could be supplied as part of that contract cannot exceed a prescribed amount. Do you think that the qualification criteria proposed meet this aim?

Don't know

Score

0

Q32. Do you think that these proposals would significantly reduce the burdens on ancillary sellers? Please select one option in each row.

*No Response*

Score

0

Q33. Do you think these proposals would impact adversely on one or more of the licensing objectives? Please select one option.

*No Response*

Score

0

Q34. 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 response to a maximum of 200 words:

*No Response*

Page Score

0

## Page 12: Freeing up responsible businesses

Q35. 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.

No

Score

0

Q36. 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
Reduce the burden	X		
Increase the burden			

Score

0

Page Score

0

## Page 13: Freeing up responsible businesses

Q37. Should the number of TENs which can be given in respect of individual premises be increased? Please select one option.

No

Score

0

Q38. If you answered yes, please select one option to indicate which you would prefer. Please select one option.

*No Response*

Score

0

Page Score

0

## Page 14: Freeing up responsible businesses

Q39. 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
<b>Determining that premises in certain areas are exempt</b>			
<b>Determining that certain premises types are exempt in their local area</b>	X		

Score

0

Q40. 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.

Don't know

Score

0

Q41. 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).

*No Response*

Page Score

0

## Page 15: Freeing up responsible businesses

Q42. Do you agree with each of the following proposals? Please select one option in each row.

*No Response*

Score

0

Q43. Do you think that each of the following would reduce the overall burdens on business? Please select one option in each row.

*No Response*

Score

0

Q44. 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.

*No Response*

Score

0

Q45. 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 keep your views to a maximum of 200 words.)

*No Response*

Page Score

0

## Page 16: Impact assessments

Q46. Impact assessments for the proposals in this consultation have been published alongside the full consultation document. 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.

*No Response*

Score

0

Q47. Do you have any comments on the methodologies or assumptions used in the impact assessments? If yes, please specify in the box below, clearly referencing the impact assessment and page to which you refer (keeping your views to a maximum of 400 words).

*No Response*

Page Score

0

## Scoring Summary

Pages	Total
1. About you	0
2. A minimum unit price for alcohol	0
3. A minimum unit price for alcohol	0
4. A ban on multi-buy promotions in the off-trade	0
5. A ban on multi-buy promotions in the off-trade	0
6. Reviewing the mandatory licensing conditions	0
7. Reviewing the mandatory licensing conditions	0
8. Health as a licensing objective for cumulative impact policies	0
9. Health as a licensing objective for cumulative impact policies	0

10. Freeing up responsible businesses	0
11. Freeing up responsible businesses	0
12. Freeing up responsible businesses	0
13. Freeing up responsible businesses	0
14. Freeing up responsible businesses	0
15. Freeing up responsible businesses	0
16. Impact assessments	0
<b>Total Survey Score:</b>	<b>0</b>

# Alcohol strategy consultation

User Details - 5456139

**Date Started:** 04/02/2013 15:06:01      **Date Ended:** 04/02/2013 15:14:07

**Time taken:** 8 mins, 6 secs      **IP Address:** n/a

**Unique ID:** n/a

## Page 1: About you

Q1. Please select if you would like your response or personal details to be treated as confidential.

**No Response**

Score

0

Q2. Which of the following best describes you or the professional interest you represent? Please select one option from the menu below.

Member of the public

***Please specify which organisation, licensing authority or police force you represent in the box below:***

None

Score

0

Q3. If you are responding on behalf of an organisation or interest group, please write in the box below the number of members in your group or organisation.

**No Response**

Q4. How did you obtain the views of your members? Please explain in the box below keeping your response to a maximum of 100 words.

Not applicable

Q5. Please indicate in which region you or your organisation is based.

Please select one option from the menu below.

London

Score

0

Q6. If you are responding as a member of the public, what is your gender?

Please select one option.

Male

Score

0

Q7. If you are responding as a member of the public, what is your age?

Please select one option.

55-64

Score

0

Page Score

0

## Page 2: A minimum unit price for alcohol

Q8. In the alcohol strategy, the government committed to introducing a minimum unit price for alcohol in England and Wales. This consultation will contribute to the debate on the most appropriate price per unit and the mechanism by which, once set, minimum unit pricing would remain effective. It is also an opportunity for interested parties to raise other issues around minimum unit pricing. The purpose of minimum unit pricing is to reduce alcohol consumption, particularly by the most hazardous and harmful drinkers who tend to show a preference for the cheapest alcohol products. By doing so the government estimates there will be a reduction in the associated crime and health harms, especially the numbers of hospital admissions, alcohol-related deaths and alcohol-related crimes. Minimum unit pricing is not intended disproportionately to affect responsible drinkers or particular social groups but to reduce the availability of alcohol sold at very low or heavily discounted prices. More information (including the definitions of hazardous and harmful drinkers) is available in the full consultation document and the impact assessment. Do you want to answer questions on minimum unit pricing? Please select one option.

Yes

Score

0

Page Score

0

## Page 3: A minimum unit price for alcohol

Q9. The impact of minimum unit pricing will depend on the price per unit of alcohol. The government wants to ensure that the chosen price level is targeted and proportionate, whilst achieving a significant reduction of harm. The government is therefore consulting on the introduction of a recommended minimum unit price of 45p. The government estimates a reduction in consumption across all product types of 3.3 per cent, a reduction in crime of 5,240 per year, a reduction in 24,600 alcohol-related hospital admissions and 714 fewer deaths per year after ten years. Do you agree that this minimum unit price level would achieve these aims? Please select one option.

No

Score

0

Q10. Should other factors or evidence be considered when setting a minimum unit price for alcohol? Please select one option.

No

Score

0

Q11. The government wishes to maintain the effectiveness of minimum unit pricing and is therefore proposing to adjust the minimum unit price level over time. 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 automatically be updated in line with inflation each year

Score

0

Q12. 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

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

Responsible but poor persons would be adversely affected.

Score

0

Page Score

0

## Page 4: A ban on multi-buy promotions in the off-trade

Q13. The government is consulting on introducing a ban on multi-buy promotions in the off-trade (e.g. shops and off-licences) as part of its wider strategy to reduce excessive alcohol consumption, and alongside the introduction of a minimum unit price. A ban on multi-buy promotions would therefore not apply to pubs, clubs, bars or restaurants. The term 'multi-buy promotions' refers to alcohol promotions that offer a discount for buying multiple items. 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. As well as being part of a wider strategy to reduce consumption and tackle irresponsible alcohol sales, a ban on multi-buy promotions would also contribute to the government's aim of encouraging people to be aware of how much they drink and the risks of excessive drinking, so that they can make informed choices. The aim of this consultation is to assess support for such a ban and contribute to our understanding of the impact a ban on multi-buy promotions may have. The types of promotion it is proposed that a ban would include, are: two for the price of one, three for the price of two, buy one get one free, buy six and get 20 per cent off, 24 cans of lager costing less than 24 times the cost of a single 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<sup>3</sup> for £10 where each bottle costs more than £3.33 More information is available in the full consultation document and the impact assessment. Do you want to answer questions on a ban on multi-buy promotions in the off-trade? Please select one option.

Yes

Score

0

Page Score

0

## Page 5: A ban on multi-buy promotions in the off-trade

Q14. Do you think there should be a ban on multi-buy promotions involving alcohol in the off-trade? Please select one option.

Yes

Score

0

Q15. Are there any further offers which should be included in a ban on multi-buy promotions? Please select one option.

No

Score

0

Q16. Should other factors or evidence be taken into account when considering a ban on multi-buy promotions? Please select one option.

No

Score

0

Q17. 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.

No

Score

0

Page Score

0

## Page 6: Reviewing the mandatory licensing conditions

Q18. 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 alcohol 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. The government has also committed to consult on whether these mandatory licensing conditions should, where relevant, apply to both the on-

and off-trade. This consultation forms part of that review, and will contribute to the government's understanding of how these mandatory conditions are perceived. The five mandatory licensing conditions currently set out in regulations in relation to the supply of alcohol are: a ban on irresponsible promotions a ban on dispensing alcohol by one person directly into the mouth of another a requirement to provide free tap water on request to customers a requirement to have an age verification policy to prevent the sale of alcohol to persons under 18 years of age, and a requirement to make available to customers small measures such as half pints or beer or cider or 125ml glasses of wine More information is available in the full consultation document. An explanation of each of these terms can be found on page 20 of the consultation document, in the glossary at the end. Do you want to answer questions on reviewing the mandatory licensing conditions? Please select one option.

Yes

Score

0

Page Score

0

## Page 7: Reviewing the mandatory licensing conditions

Q19. Do you think each of the mandatory licensing conditions is effective in promoting the licensing objectives? For more information on the licensing objectives please see the glossary at the end of the full consultation document. Please select one option (Yes, No, Don't know) from each drop down menu.

	Prevention of crime and disorder	Public safety	Prevention of public nuisance	Protection of children from harm
<b>Irresponsible promotions</b>	Yes	Yes	Yes	Yes
<b>Dispensing alcohol directly into the mouth</b>	Yes	Yes	Yes	Yes
<b>Mandatory provision of free tap water</b>	No	Yes	No	Don't know
<b>Age verification policy</b>	Yes	Yes	Yes	Yes
<b>Mandatory</b>	Yes	Yes	Yes	No

<b>provision of small measures</b>				
Score				
0				
Q20. Do you think that the mandatory licensing conditions do enough to target irresponsible promotions in pubs and clubs? Please select one option.				
Yes				
Score				
0				
Q21. Are there other issues related to the licensing objectives which could be tackled through a mandatory licensing condition? Please select one option.				
No				
Score				
0				
Q22. Do you think that 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				
Score				
0				
Page Score				
0				

## Page 8: Health as a licensing objective for cumulative impact policies

Q23. We want to ensure that licensing authorities are able to take alcohol-related health harms into consideration when making decisions about cumulative impact policies (CIPs) which can be used to manage problems linked to the density of premises in specific areas. 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. We are proposing 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. We expect that those areas with the highest levels of alcohol-related health harm, or fast rising levels of harm from alcohol, will be most likely to use this power. It 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. More information is available in the full consultation document and impact assessment. Do you want to answer questions on health as a licensing objective for cumulative impact policies? Please select one option.

No

Score

0

Page Score

0

## Page 9: Health as a licensing objective for cumulative impact policies

Q24. 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):

*No Response*

Q25. 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.

*No Response*

Score

0

Q26. 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 your answer in the box below, providing evidence to support your response (keeping your views to a maximum of 200 words):

*No Response*

Page Score

0

## Page 10: Freeing up responsible businesses

Q27. The government has committed to consult on giving licensing authorities greater freedom to take decisions that reflect the needs of their local community. Following the government's Red Tape Challenge in 2011, three areas of reform were specified: alcohol licensing for certain types of premises providing minimal alcohol sales, temporary event notices (TENs) and the licensing of late night refreshment. This section asks for views on these proposals and suggests further ways to reduce burdens on business. The proposals set out here can be seen alongside work undertaken by the Department for Culture, Media and Sport to remove unnecessary red tape from regulated entertainment. More information on each of these areas for reform is available in the full consultation document. There are five subjects covered in this section. They are: ancillary sales of alcohol, occasional provision of licensable activities at community events, an extension of the temporary event notice limit at individual premises, late night refreshment, and further proposals to reduce burdens on business. Do you want to answer

questions on freeing up responsible businesses? Please select one option.

Yes

Score

0

Page Score

0

## Page 11: Freeing up responsible businesses

Q28. Ancillary sales of alcohol For many businesses, the sale of alcohol is only a small part of, or incidental to, their wider activities, and occurs alongside the provision of another product or service (which this consultation refers to as an 'ancillary sale'). For example, a guesthouse might wish to provide wine to its guests with an evening meal or a complimentary bottle of wine in a guest's room, while a hairdresser might wish to offer clients a glass of wine. 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
<b>The provision should be limited to a specific list of certain types of business and the kinds of sales they make</b>		X	
<b>The provision should be available to all businesses providing they meet certain qualification criteria to be an ancillary seller</b>	X		
<b>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 the above options</b>	X		

Score

0

Q29. If special provisions 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.

	Yes	No	Don't know
<b>Accommodation providers, providing alcohol alongside accommodation as part of the contract</b>	X		
<b>Hair and beauty salons, providing alcohol</b>		X	

<b>alongside a hair or beauty treatment</b>			
<b>Florists, providing alcohol alongside the purchase of flowers</b>		X	
<b>Cultural organisations, such as theatres, cinemas and museums, providing alcohol alongside cultural events as part of the entry ticket</b>	X		
<b>Regular charitable events, providing alcohol as part of the wider occasion</b>	X		

Score

0

Q30. 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 suggestions in the box below, keeping your views to a maximum of 200 words:

**No Response**

Q31. 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. Alternatively, a second option is to broaden the definition of 'ancillary sales' to include all businesses (and/or not for profit activities) through the use of a general set of qualification criteria, for example, to the effect that: alcohol must be sold or supplied as a small part or proportion of a sales transaction or contract for a wider service, and the amount of alcohol that could be supplied as part of that contract cannot exceed a prescribed amount. Do you think that the qualification criteria proposed meet this aim?

Yes

Score

0

Q32. 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
<b>Allow premises making ancillary sales to request in their premises licence application that the requirement for a personal licence holder be removed</b>		X	
<b>Introduce a new, light-touch form of authorisation for premises making ancillary sales - an ASN but</b>		X	

<b>retaining the need for a personal licence holder</b>			
<b>Introduce a new, light touch form of authorisation for premises making ancillary sales - an ASN - with no requirement for a personal licence holder</b>	X		

Score

0

Q33. Do you think these proposals would impact adversely on one or more of the licensing objectives? Please select one option.

	Yes	No	Don't know
<b>Allow premises making ancillary sales to request in their premises licence application that the requirement for a personal licence holder be removed</b>		X	
<b>Introduce a new, light-touch form of authorisation for premises making ancillary sales - an ASN but retaining the need for a personal licence holder</b>		X	
<b>Introduce a new, light touch form of authorisation for premises making ancillary sales - an ASN - with no requirement for a personal licence holder</b>		X	

Score

0

Q34. 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 response to a maximum of 200 words:

*No Response*

Page Score

0

## Page 12: Freeing up responsible businesses

Q35. 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.

No

Score

0

Q36. 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
--	-----	----	------------

<b>Reduce the burden</b>	X		
<b>Increase the burden</b>		X	

Score

0

Page Score

0

## Page 13: Freeing up responsible businesses

Q37. Should the number of TENs which can be given in respect of individual premises be increased? Please select one option.

Yes

Score

0

Q38. If you answered yes, please select one option to indicate which you would prefer. Please select one option.

18

Score

0

Page Score

0

## Page 14: Freeing up responsible businesses

Q39. 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
<b>Determining that premises in certain areas are exempt</b>	X		
<b>Determining that certain premises types are exempt in their local area</b>	X		

Score

0

Q40. 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.

No

Score

0

Q41. 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).

**No Response**

Page Score

0

## Page 15: Freeing up responsible businesses

Q42. Do you agree with each of the following proposals? Please select one option in each row.

	Yes	No	Don't know
<b>Remove requirements to advertise licensing applications in local newspapers</b>	X		
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs for the on and off-trade</b>		X	
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs, but only in respect of overnight accommodation - lodges</b>	X		
<b>Remove or simplify requirements to renew personal licences under the 2003 Act</b>		X	

Score

0

Q43. 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
<b>Remove requirements to advertise licensing applications in local newspapers</b>	X		
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs for the on and off-trade</b>	X		
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs, but only in respect of overnight accommodation - lodges</b>	X		
<b>Remove or simplify requirements to renew personal licences under the 2003 Act</b>	X		

Score

0

Q44. 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.

	Yes	No	Don't know

<b>Remove requirements to advertise licensing applications in local newspapers</b>		X	
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs for the on and off-trade</b>		X	
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs, but only in respect of overnight accommodation - lodges</b>		X	
<b>Remove or simplify requirements to renew personal licences under the 2003 Act</b>	X		

Score

0

Q45. 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 keep your views to a maximum of 200 words.)

*No Response*

Page Score

0

## Page 16: Impact assessments

Q46. Impact assessments for the proposals in this consultation have been published alongside the full consultation document. 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
<b>Minimum unit pricing</b>			X
<b>Multi-buy promotions</b>			X
<b>Health as a licensing objective for cumulative impact</b>			X
<b>Ancillary sales of alcohol</b>	X		
<b>Temporary event notices</b>	X		
<b>Late night refreshment</b>			X
<b>Removing the duty to advertise licence applications in a local newspaper</b>			X

<b>Sales of alcohol at motorway service stations</b>			X
<b>Personal licences</b>			X

Score

0

Q47. Do you have any comments on the methodologies or assumptions used in the impact assessments? If yes, please specify in the box below, clearly referencing the impact assessment and page to which you refer (keeping your views to a maximum of 400 words).

*No Response*

Page Score

0

## Scoring Summary

Pages	Total
1. About you	0
2. A minimum unit price for alcohol	0
3. A minimum unit price for alcohol	0
4. A ban on multi-buy promotions in the off-trade	0
5. A ban on multi-buy promotions in the off-trade	0
6. Reviewing the mandatory licensing conditions	0
7. Reviewing the mandatory licensing conditions	0
8. Health as a licensing objective for cumulative impact policies	0
9. Health as a licensing objective for cumulative impact policies	0
10. Freeing up responsible businesses	0
11. Freeing up responsible businesses	0
12. Freeing up responsible businesses	0
13. Freeing up responsible businesses	0

14. Freeing up responsible businesses	0
15. Freeing up responsible businesses	0
16. Impact assessments	0
<b>Total Survey Score:</b>	0

# Alcohol strategy consultation

---

User Details - 5453100

**Date Started:** 04/02/2013 10:23:26    **Date Ended:** 04/02/2013 15:39:02

**Time taken:** 5 hrs, 15 mins, 36 secs    **IP Address:** n/a

**Unique ID:** n/a

---

## Page 1: About you

Q1. Please select if you would like your response or personal details to be treated as confidential.

**No Response**

Score

0

Q2. Which of the following best describes you or the professional interest you represent? Please select one option from the menu below.

Licensing authority

***Please specify which organisation, licensing authority or police force you represent in the box below:***

Wolverhampton City Council Civic Centre St. Peter's Square

Wolverhampton WV1 1RT

Score

0

Q3. If you are responding on behalf of an organisation or interest group, please write in the box below the number of members in your group or organisation.

**No Response**

Q4. How did you obtain the views of your members? Please explain in the box below keeping your response to a maximum of 100 words.

Consultation with: - representative groups/bodies, Including

Safer Wolverhampton Partnership

The Responsible Authorities Forum

The Alcohol Strategy, Strategic Leads Group

Strategic Alcohol Commissioning Group (Wolverhampton City PCT)

Joint Commissioning Group

Councillors -

Relevant councillors – The Licensing Committee and the Cabinet Member for Health & Well Being

And pertinent partners and departments within the Council, including Public Health, Wolverhampton City PCT, The Police and other relevant council departments specifically licensing and ABS Unit for eg.

Q5. Please indicate in which region you or your organisation is based.  
Please select one option from the menu below.

West Midlands

Score

0

Q6. If you are responding as a member of the public, what is your gender?  
Please select one option.

*No Response*

Score

0

Q7. If you are responding as a member of the public, what is your age?  
Please select one option.

*No Response*

Score

0

Page Score

0

## Page 2: A minimum unit price for alcohol

Q8. In the alcohol strategy, the government committed to introducing a minimum unit price for alcohol in England and Wales. This consultation will contribute to the debate on the most appropriate price per unit and the mechanism by which, once set, minimum unit pricing would remain effective. It is also an opportunity for interested parties to raise other issues around minimum unit pricing. The purpose of minimum unit pricing is to reduce alcohol consumption, particularly by the most hazardous and harmful drinkers who tend to show a preference for the cheapest alcohol products. By doing so the government estimates there will be a reduction in the associated crime and health harms, especially the numbers of hospital admissions, alcohol-related deaths and alcohol-related crimes. Minimum unit pricing is not intended disproportionately to affect responsible drinkers or particular social groups but to reduce the availability of alcohol sold at very low or heavily discounted prices. More information (including the definitions of hazardous and harmful drinkers) is available in the full consultation document and the impact assessment. Do you want to answer questions on minimum unit pricing? Please select one option.

Yes

Score

0

Page Score

0

## Page 3: A minimum unit price for alcohol

Q9. The impact of minimum unit pricing will depend on the price per unit of alcohol. The government wants to ensure that the chosen price level is targeted and proportionate, whilst achieving a significant reduction of harm. The government is therefore consulting on the introduction of a recommended minimum unit price of 45p. The government estimates a reduction in consumption across all product types of 3.3 per cent, a reduction in crime of 5,240 per year, a reduction in 24,600 alcohol-related hospital admissions and 714 fewer deaths per year after ten years. Do you agree that this minimum unit price level would achieve these aims? Please select one option.

No

***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):***

Wolverhampton believes 50p would be the appropriate level at which a MUP should be set. A 50p MUP optimises the reduction in harms that can be achieved whilst striking a balance in not unduly penalising moderate drinkers. A 50p MUP is supported by the CMO annual report of 2008 and previously by the West Midlands Directors of Public Health. There is strong evidence that affordability has an impact on alcohol consumption. Sheffield University's Alcohol Policy Model, version 2, shows that increasing price is effective in reducing alcohol consumption and alcohol related health crime and employment harms. A 50p MUP would impact on hazardous and harmful drinkers whilst minimising the financial impact on moderate drinkers. The study models that a 50p MUP would lead to savings of 3,060 alcohol related deaths, & 97,700 hospital related admissions in the 10th year after implementation; and 42,500, crimes in the first year.

Wolverhampton has more than double the national alcohol mortality rates and alcohol mortality rates are 45% higher than similar areas in England, and approx. 50% of the 5,448 violent offences committed during 2009/10 in Wolverhampton involved alcohol; thus Wolverhampton would be keen to maximise the level of savings achieved for the City.

Score

0

Q10. Should other factors or evidence be considered when setting a minimum unit price for alcohol? Please select one option.

Yes

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

There should be a stronger consideration of the preventative aspect to minimum pricing; NICE PH24 guidance shows that young people who drink tend to drink cheaper products. A MUP addresses the issue of "pocket money" prices for alcohol. Similarly every problematic drinker starts as an unproblematic one so action to address issues of price and availability is welcome. The price of alcohol in relation to other products, Alcohol Concern (2009) show, in their study measuring alcohol price in relation to household

income, that the price of alcohol has declined over the last 50 years. Alcohol is 69% more affordable in 2007 than it was in 1980. A MUP must be reflective of individual or household expenditure. The MUP should be regularly reviewed to ensure that alcohol does not become more affordable in comparison to other goods (we suggest annually). Whilst we appreciate responsible drinkers should not be penalised in Wolverhampton alcohol related mortality and admission rates are highest in the most deprived areas.

Score

0

Q11. The government wishes to maintain the effectiveness of minimum unit pricing and is therefore proposing to adjust the minimum unit price level over time. 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

Score

0

Q12. 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

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

Children and young people - in Wolverhampton a study has shown that between 5-10% of children are affected by parental alcohol problems and nationally 50% of child protection cases identify alcohol as a factor.

Communities and neighbourhoods as this would have an impact on alcohol related incidents in local areas and reduce the fear of crime and ASB.

Positive impacts on the on-trade and the night time economy, preventing pre-loading, which would additionally support the reduction of alcohol related crime and disorder.

Score

0

Page Score

0

## **Page 4: A ban on multi-buy promotions in the off-trade**

Q13. The government is consulting on introducing a ban on multi-buy promotions in the off-trade (e.g. shops and off-licences) as part of its wider strategy to reduce excessive alcohol consumption, and alongside the introduction of a minimum unit price. A ban on multi-buy promotions would therefore not apply to pubs, clubs, bars or restaurants. The term 'multi-buy promotions' refers to alcohol promotions that offer a discount for buying

multiple items. 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. As well as being part of a wider strategy to reduce consumption and tackle irresponsible alcohol sales, a ban on multi-buy promotions would also contribute to the government's aim of encouraging people to be aware of how much they drink and the risks of excessive drinking, so that they can make informed choices. The aim of this consultation is to assess support for such a ban and contribute to our understanding of the impact a ban on multi-buy promotions may have. The types of promotion it is proposed that a ban would include, are: two for the price of one, three for the price of two, buy one get one free, buy six and get 20 per cent off, 24 cans of lager costing less than 24 times the cost of a single 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, 3 for £10 where each bottle costs more than £3.33. More information is available in the full consultation document and the impact assessment. Do you want to answer questions on a ban on multi-buy promotions in the off-trade? Please select one option.

Yes

Score

0

Page Score

0

## Page 5: A ban on multi-buy promotions in the off-trade

Q14. Do you think there should be a ban on multi-buy promotions involving alcohol in the off-trade? Please select one option.

Yes

Score

0

Q15. Are there any further offers which should be included in a ban on multi-buy promotions? Please select one option.

Yes

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

When is sold in multi-buy promotions that includes discounted snacks, such as crisps and "nibbles". We are not implying that the common higher end meal deal offers seen in supermarkets are included in this.

Score

0

Q16. Should other factors or evidence be taken into account when considering a ban on multi-buy promotions? Please select one option.

Yes

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

Buying more alcohol than is required means that it is often readily available in the home, thus it is more accessible to children and young people. In Wolverhampton our Every Child Matters Lifestyle Survey (2010) shows that 21% of secondary school children (12-15yrs) had drunk alcohol during the previous week; of those children 62% had drunk at home and 8% had drunk without their parents' knowledge. Children & YP are more likely to drink at home, past thinking were this happened mostly outside the home. Action on multi-buy promotions will help achieve health objectives and guidance around alcohol free days and unit guidance, which provides a more holistic approach to alcohol. It will also help individuals consider their alcohol intake in relation to the price they pay for it and support moderate drinking. The availability of alcohol at home, means that there is the potential for alcohol to become a normalised every day activity. Rather than for socialisation or entertainment purposes.

Score

0

Q17. 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

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

• On-trade would benefit - less pre-loading • Children and young people • Will support the night time economy in the City

Score

0

Page Score

0

## **Page 6: Reviewing the mandatory licensing conditions**

Q18. 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 alcohol 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. The government has also committed to consult on whether these mandatory licensing conditions should, where relevant, apply to both the on- and off-trade. This consultation forms part of that review, and will contribute to the government's understanding of how these mandatory conditions are perceived. The five mandatory licensing conditions currently set out in regulations in relation to the supply of alcohol are: a ban on irresponsible promotions a ban on dispensing alcohol by one person directly into the mouth of another a requirement to provide free tap water on request to

customers a requirement to have an age verification policy to prevent the sale of alcohol to persons under 18 years of age, and a requirement to make available to customers small measures such as half pints or beer or cider or 125ml glasses of wine. More information is available in the full consultation document. An explanation of each of these terms can be found on page 20 of the consultation document, in the glossary at the end. Do you want to answer questions on reviewing the mandatory licensing conditions? Please select one option.

Yes

Score

0

Page Score

0

## Page 7: Reviewing the mandatory licensing conditions

Q19. Do you think each of the mandatory licensing conditions is effective in promoting the licensing objectives? For more information on the licensing objectives please see the glossary at the end of the full consultation document. Please select one option (Yes, No, Don't know) from each drop down menu.

	<b>Prevention of crime and disorder</b>	<b>Public safety</b>	<b>Prevention of public nuisance</b>	<b>Protection of children from harm</b>
<b>Irresponsible promotions</b>	No	No	No	No
<b>Dispensing alcohol directly into the mouth</b>	Yes	Yes	Yes	-
<b>Mandatory provision of free tap water</b>	Yes	Yes	Yes	-
<b>Age verification policy</b>	Yes	Yes	Yes	Yes
<b>Mandatory provision of small measures</b>	Yes	Yes	Yes	-

Score

0

Q20. Do you think that the mandatory licensing conditions do enough to target irresponsible promotions in pubs and clubs? Please select one

option.

No

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

The wording of the “irresponsible promotions” conditions is too ambiguous which makes it extremely difficult to enforce. The wording requires significant evidence that the promotion is irresponsible and crime and disorder to have occurred before action can be taken which results in premises still being able to offer alcohol at what responsible authorities would deem to be irresponsible.

Score

0

Q21. Are there other issues related to the licensing objectives which could be tackled through a mandatory licensing condition? Please select one option.

Yes

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

A mandatory condition could be introduced which states that premises are unable to allow patrons to enter the premises if they are already under the influence of alcohol. Many visitors to the venues within the night time economy have already consumed a significant quantity of alcohol which is termed as “pre-loading”. Some premises are responsible and have an internal policy that prevents the entre however many do not. By having this type of condition on a premises may see a significant reduction in alcohol levels consumed prior to entering the evening venues which could then see a reduction in alcohol related crime within the night time economy. A further mandatory condition could be introduced to cover CCTV within a premises. A condition relating to CCTV being situated within a premises is regularly attached either by applicants or following consultation with responsible authorities. CCTV conditions have now become a ‘standard condition’ Late night refreshment venues could also have a mandatory condition attached to them. Late night refreshment venues, particularly ones within the night time economy, can become very busy which in many cases results in a high number of recorded crime. These types of premises currently have no mandatory conditions attached, unless the operating schedule specifically mentions the use of SIA.

Score

0

Q22. Do you think that 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.

No

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

More conditions to be generic to licensed premises such as: All persons

selling alcohol must be properly trained before they are allowed to sell any alcohol to the public. Records must be kept of training by the DPS or Premises Licence Holder. Persons selling alcohol must be authorised in writing by the DPS following successful completion of training. The records must be kept on the premises during opening hours and must be made available on request to an officer of a Responsible Authority. Refresher training must be carried out at regular intervals and records maintained. The records must be kept on the premises during opening hours and must be made available on request to an officer of a Responsible Authority A 'Challenge 25' policy and 'No ID NO Sale' policy which is supported with signage at all entrances and in the serving areas must be implemented. Only documents which include a photograph of the purchaser should be used to prove that persons age, e.g. passport, new style driving licence, 'PASS' approved age card e.g. Validate Card or Citizens Card. A 'Refusals Log' must be maintained, which documents the date and time a refusal of sale is made, the reason for the refusal and the member of staff refusing the sale. The Premises Licence Holder or the Designated Premises Supervisor (DPS) must monitor the Log on a regular basis and sign it to show it has been done. The Log must be kept on the premises during opening hours and must be made available on request to an officer of a Responsible Authority. A till prompt or a notice must be secured to the till at eye level to remind staff that they must ask for ID if a customer looks under 25.

Score

0

Page Score

0

## **Page 8: Health as a licensing objective for cumulative impact policies**

Q23. We want to ensure that licensing authorities are able to take alcohol-related health harms into consideration when making decisions about cumulative impact policies (CIPs) which can be used to manage problems linked to the density of premises in specific areas. 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. We are proposing 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. We expect that those areas with the highest levels of alcohol-related health harm, or fast rising levels of harm from alcohol, will be most likely to use this power. It 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. More information is available in the full consultation document and impact assessment. Do you want to answer questions on health as a licensing objective for cumulative impact policies? Please select one option.

Yes

Score

0

Page Score

0

## Page 9: Health as a licensing objective for cumulative impact policies

Q24. 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):

Wolverhampton would like to see the prevention of health harms as a specific licensing objective, where the data described following could also be used.

However, in relation to CIP

- Hospital mortality data
- Hospital admissions data
- A+E attendance data
- Anonymised treatment services data and information, specifically information about who is accessing treatment services and where from.
- Adhoc audits and lifestyle surveys generated on the basis of local issues or area concerns.
- Alcohol related assault data, currently the collection of such data is provided on the basis of local arrangements and data sharing agreements (as in Wolverhampton where a standalone system is in place; the collection of data is dependent on the goodwill/time of staff entering the data.)

It would be better if Government made the collection of alcohol related assault data mandatory for A&E departments, thus good quality routine local and national data and information would be available.

Hospital data caveat - there also has to be improved categorisation to ensure that alcohol related hospital data is recorded, eg falls may be related to alcohol but are not recorded as such, this would require national guidance/instruction.

Q25. 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

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

The current guidance allows consideration of health data such as A&E attendances; however this data only considers the impact of the acute harms of alcohol. If a health licensing objective is to be applied then the guidance will need revising to allow long terms health issues to be considered. It also needs to be emphasised in the guidance that this data must be location specific and not general city or regional data. Licensing authorities and health bodies will need to identify the rational for any CIP based on health grounds and ensures the CIP is worded in such a way that it is clear to applicants where the policy is likely to be invoked. This may also allow a broader range of areas to become appropriate for a CIP, such as wards where there are high levels of alcohol related admissions and/or mortality, and ever increasing numbers of outlets supplying alcohol. The guidance should make it clear that CIP based on health grounds should not be restricted to night time economy hubs.

Score

0

Q26. 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 your answer in the box below, providing evidence to support your response (keeping your views to a maximum of 200 words):

Wolverhampton would support the prevention of health harms as a licensing condition.

In Wolverhampton there are strong geographical links to the health harms of alcohol in relation to alcohol related admissions and mortality. There is the ability to use postcode data to map the prevalence of service use to particular areas. However, much of the alcohol related health data relates to where people live (their home address) rather than where alcohol related problems or incidents occur. Wolverhampton's Cumulative Impact Zone is in the City Centre so while there is a range of data available not all of it will be useable in all cases.

Including a consideration of health harms would increase the "visibility" of the health harms of alcohol but more importantly it would place these harms strongly on the agenda alongside the other issues around crime & ASB for example.

Page Score

0

## Page 10: Freeing up responsible businesses

Q27. The government has committed to consult on giving licensing authorities greater freedom to take decisions that reflect the needs of their local community. Following the government's Red Tape Challenge in 2011, three areas of reform were specified: alcohol licensing for certain types of premises providing minimal alcohol sales, temporary event notices (TENs) and the licensing of late night refreshment. This section asks for views on these proposals and suggests further ways to reduce burdens on business. The proposals set out here can be seen alongside work undertaken by the Department for Culture, Media and Sport to remove unnecessary red tape from regulated entertainment. More information on each of these areas for reform is available in the full consultation document. There are five subjects covered in this section. They are: ancillary sales of alcohol, occasional provision of licensable activities at community events, an extension of the temporary event notice limit at individual premises, late night refreshment, and further proposals to reduce burdens on business. Do you want to answer questions on freeing up responsible businesses? Please select one option.

Yes

Score

0

Page Score

0

## Page 11: Freeing up responsible businesses

Q28. Ancillary sales of alcohol For many businesses, the sale of alcohol is only a small part of, or incidental to, their wider activities, and occurs alongside the provision of another product or service (which this consultation refers to as an 'ancillary sale'). For example, a guesthouse might wish to provide wine to its guests with an evening meal or a complimentary bottle of wine in a guest's room, while a hairdresser might wish to offer clients a glass of wine. 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
<b>The provision should be limited to a specific list of certain types of business and the kinds of sales they make</b>		X	
<b>The provision should be available to all businesses providing they meet certain qualification criteria to be an ancillary seller</b>	X		

<b>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 the above options</b>		X	
--	--	---	--

Score

0

Q29. If special provisions 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.

	Yes	No	Don't know
<b>Accommodation providers, providing alcohol alongside accommodation as part of the contract</b>		X	
<b>Hair and beauty salons, providing alcohol alongside a hair or beauty treatment</b>	X		
<b>Florists, providing alcohol alongside the purchase of flowers</b>	X		
<b>Cultural organisations, such as theatres, cinemas and museums, providing alcohol alongside cultural events as part of the entry ticket</b>		X	
<b>Regular charitable events, providing alcohol as part of the wider occasion</b>		X	

Score

0

Q30. 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 suggestions in the box below, keeping your views to a maximum of 200 words:

No.

Q31. 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. Alternatively, a second option is to broaden the definition of 'ancillary sales' to include all businesses (and/or not for profit activities) through the use of a general set of qualification criteria, for example, to the effect that: alcohol must be sold or supplied as a small part or proportion of a sales transaction or contract for a wider service, and the amount of alcohol that could be supplied as part of that contract cannot exceed a prescribed amount. Do you think that the qualification criteria

proposed meet this aim?

No

***Please use the space below to provide further comments (keeping your views to a maximum of 200 words):***

What is the legal definition of 'small part of, or incidental to'? It is too vague and open to interpretation.

Score

0

Q32. 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
<b>Allow premises making ancillary sales to request in their premises licence application that the requirement for a personal licence holder be removed</b>	X		
<b>Introduce a new, light-touch form of authorisation for premises making ancillary sales - an ASN but retaining the need for a personal licence holder</b>	X		
<b>Introduce a new, light touch form of authorisation for premises making ancillary sales - an ASN - with no requirement for a personal licence holder</b>	X		

Score

0

Q33. Do you think these proposals would impact adversely on one or more of the licensing objectives? Please select one option.

	Yes	No	Don't know
<b>Allow premises making ancillary sales to request in their premises licence application that the requirement for a personal licence holder be removed</b>		X	
<b>Introduce a new, light-touch form of authorisation for premises making ancillary sales - an ASN but retaining the need for a personal licence holder</b>			X
<b>Introduce a new, light touch form of authorisation for premises making ancillary sales - an ASN - with no requirement for a personal licence holder</b>	X		

Score

0

Q34. 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 response to a maximum of 200 words:

-

Page Score

0

## Page 12: Freeing up responsible businesses

Q35. 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

Score

0

Q36. 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
Reduce the burden	X		
Increase the burden		X	

Score

0

Page Score

0

## Page 13: Freeing up responsible businesses

Q37. Should the number of TENs which can be given in respect of individual premises be increased? Please select one option.

No

Score

0

Q38. If you answered yes, please select one option to indicate which you would prefer. Please select one option.

*No Response*

Score

0

Page Score

0

## Page 14: Freeing up responsible businesses

Q39. 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

<b>Determining that premises in certain areas are exempt</b>	X		
<b>Determining that certain premises types are exempt in their local area</b>	X		

Score

0

Q40. 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

Score

0

Q41. 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).

None.

Page Score

0

## Page 15: Freeing up responsible businesses

Q42. Do you agree with each of the following proposals? Please select one option in each row.

	Yes	No	Don't know
<b>Remove requirements to advertise licensing applications in local newspapers</b>	X		
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs for the on and off-trade</b>		X	
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs, but only in respect of overnight accommodation - lodges</b>		X	
<b>Remove or simplify requirements to renew personal licences under the 2003 Act</b>		X	

Score

0

Q43. 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
<b>Remove requirements to advertise licensing</b>	X		

<b>applications in local newspapers</b>			
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs for the on and off-trade</b>	X		
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs, but only in respect of overnight accommodation - lodges</b>	X		
<b>Remove or simplify requirements to renew personal licences under the 2003 Act</b>	X		

Score

0

Q44. 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.

	Yes	No	Don't know
<b>Remove requirements to advertise licensing applications in local newspapers</b>	X		
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs for the on and off-trade</b>	X		
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs, but only in respect of overnight accommodation - lodges</b>	X		
<b>Remove or simplify requirements to renew personal licences under the 2003 Act</b>			X

Score

0

Q45. 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 keep your views to a maximum of 200 words.)

The applicant could instead be required to engage locally with neighbouring properties / properties within a specific area i.e. leaflets, local notice boards.

Remove the restriction on petrol filling station, as this can be overcome by most and adds little/no value.

Page Score

0

## Page 16: Impact assessments

Q46. Impact assessments for the proposals in this consultation have been published alongside the full consultation document. 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
<b>Minimum unit pricing</b>		X	
<b>Multi-buy promotions</b>		X	
<b>Health as a licensing objective for cumulative impact</b>			
<b>Ancillary sales of alcohol</b>			
<b>Temporary event notices</b>			
<b>Late night refreshment</b>			
<b>Removing the duty to advertise licence applications in a local newspaper</b>			
<b>Sales of alcohol at motorway service stations</b>			
<b>Personal licences</b>			

Score

0

Q47. Do you have any comments on the methodologies or assumptions used in the impact assessments? If yes, please specify in the box below, clearly referencing the impact assessment and page to which you refer (keeping your views to a maximum of 400 words).

A. Minimum unit pricing

Pg 8 E. Appraisal (Costs and Benefits) – We are not convinced by assumptions made in paragraph 3, regarding a 45p MUP having a having a greater impact at 2014 prices, than at 2008 prices. Given 50p has been widely recommended/supported as an appropriate MUP we are unsure why 45p was chosen, it would have been useful to compare the impacts of both 45p and 50p MUP.

B. Multi-buy promotions

We would like to see more analysis on the impact of multi-buy promotions on micro and small business, which we understand is difficult to quantify. However, within Wolverhampton we have many small local/corner shops

(often BME owned) which provide an income to individuals and a service to local communities; and whilst we fully support a ban on multi-buy promotions and the MUP as a way to address issues of problematic alcohol use, we also recognise that for some small /micro businesses this may have an economic impact on their businesses.

Page Score

0

## Scoring Summary

Pages	Total
1. About you	0
2. A minimum unit price for alcohol	0
3. A minimum unit price for alcohol	0
4. A ban on multi-buy promotions in the off-trade	0
5. A ban on multi-buy promotions in the off-trade	0
6. Reviewing the mandatory licensing conditions	0
7. Reviewing the mandatory licensing conditions	0
8. Health as a licensing objective for cumulative impact policies	0
9. Health as a licensing objective for cumulative impact policies	0
10. Freeing up responsible businesses	0
11. Freeing up responsible businesses	0
12. Freeing up responsible businesses	0
13. Freeing up responsible businesses	0
14. Freeing up responsible businesses	0
15. Freeing up responsible businesses	0
16. Impact assessments	0

<b>Total Survey Score:</b>	<b>0</b>
----------------------------	----------

# Alcohol strategy consultation

---

User Details - 5456550

**Date Started:** 04/02/2013 15:47:11      **Date Ended:** 04/02/2013 16:04:25

**Time taken:** 17 mins, 14 secs      **IP Address:** n/a

**Unique ID:** n/a

---

## Page 1: About you

Q1. Please select if you would like your response or personal details to be treated as confidential.

**No Response**

Score

0

Q2. Which of the following best describes you or the professional interest you represent? Please select one option from the menu below.

Licensing authority

***Please specify which organisation, licensing authority or police force you represent in the box below:***

MEDWAY COUNCIL

Score

0

Q3. If you are responding on behalf of an organisation or interest group, please write in the box below the number of members in your group or organisation.

**No Response**

Q4. How did you obtain the views of your members? Please explain in the box below keeping your response to a maximum of 100 words.

Discussion with officers and draft response to consultation with relevant councillors

Q5. Please indicate in which region you or your organisation is based.

Please select one option from the menu below.

South East England

Score

0

Q6. If you are responding as a member of the public, what is your gender? Please select one option.

**No Response**

Score

0

Q7. If you are responding as a member of the public, what is your age?

Please select one option.

*No Response*

Score

0

Page Score

0

## Page 2: A minimum unit price for alcohol

Q8. In the alcohol strategy, the government committed to introducing a minimum unit price for alcohol in England and Wales. This consultation will contribute to the debate on the most appropriate price per unit and the mechanism by which, once set, minimum unit pricing would remain effective. It is also an opportunity for interested parties to raise other issues around minimum unit pricing. The purpose of minimum unit pricing is to reduce alcohol consumption, particularly by the most hazardous and harmful drinkers who tend to show a preference for the cheapest alcohol products. By doing so the government estimates there will be a reduction in the associated crime and health harms, especially the numbers of hospital admissions, alcohol-related deaths and alcohol-related crimes. Minimum unit pricing is not intended disproportionately to affect responsible drinkers or particular social groups but to reduce the availability of alcohol sold at very low or heavily discounted prices. More information (including the definitions of hazardous and harmful drinkers) is available in the full consultation document and the impact assessment. Do you want to answer questions on minimum unit pricing? Please select one option.

Yes

Score

0

Page Score

0

## Page 3: A minimum unit price for alcohol

Q9. The impact of minimum unit pricing will depend on the price per unit of alcohol. The government wants to ensure that the chosen price level is targeted and proportionate, whilst achieving a significant reduction of harm. The government is therefore consulting on the introduction of a recommended minimum unit price of 45p. The government estimates a reduction in consumption across all product types of 3.3 per cent, a reduction in crime of 5,240 per year, a reduction in 24,600 alcohol-related hospital admissions and 714 fewer deaths per year after ten years. Do you agree that this minimum unit price level would achieve these aims? Please select one option.

Yes

Score

0

Q10. Should other factors or evidence be considered when setting a minimum unit price for alcohol? Please select one option.

Don't know

Score

0

Q11. The government wishes to maintain the effectiveness of minimum unit pricing and is therefore proposing to adjust the minimum unit price level over time. 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 automatically be updated in line with inflation each year

Score

0

Q12. 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

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

This would affect companies producing alcohol and those selling wholesale.

Score

0

Page Score

0

## **Page 4: A ban on multi-buy promotions in the off-trade**

Q13. The government is consulting on introducing a ban on multi-buy promotions in the off-trade (e.g. shops and off-licences) as part of its wider strategy to reduce excessive alcohol consumption, and alongside the introduction of a minimum unit price. A ban on multi-buy promotions would therefore not apply to pubs, clubs, bars or restaurants. The term 'multi-buy promotions' refers to alcohol promotions that offer a discount for buying multiple items. 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. As well as being part of a wider strategy to reduce consumption and tackle irresponsible alcohol sales, a ban on multi-buy promotions would also contribute to the government's aim of encouraging people to be aware of how much they drink and the risks of excessive drinking, so that they can make informed choices. The aim of this consultation is to assess support for such a ban and contribute to our understanding of the impact a ban on multi-buy promotions may have. The types of promotion it is proposed that a ban would include, are: two for the price of one, three for the price of two, buy one get one free, buy six and get 20 per cent off, 24 cans of lager costing less than 24 times the cost of a single

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 for £10 where each bottle costs more than £3.33. More information is available in the full consultation document and the impact assessment. Do you want to answer questions on a ban on multi-buy promotions in the off-trade? Please select one option.

Yes

Score

0

Page Score

0

## Page 5: A ban on multi-buy promotions in the off-trade

Q14. Do you think there should be a ban on multi-buy promotions involving alcohol in the off-trade? Please select one option.

Yes

Score

0

Q15. Are there any further offers which should be included in a ban on multi-buy promotions? Please select one option.

Don't know

Score

0

Q16. Should other factors or evidence be taken into account when considering a ban on multi-buy promotions? Please select one option.

Don't know

Score

0

Q17. 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.

Don't know

Score

0

Page Score

0

## Page 6: Reviewing the mandatory licensing conditions

Q18. 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 alcohol 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. The government has also committed to consult on whether these

mandatory licensing conditions should, where relevant, apply to both the on- and off-trade. This consultation forms part of that review, and will contribute to the government's understanding of how these mandatory conditions are perceived. The five mandatory licensing conditions currently set out in regulations in relation to the supply of alcohol are: a ban on irresponsible promotions a ban on dispensing alcohol by one person directly into the mouth of another a requirement to provide free tap water on request to customers a requirement to have an age verification policy to prevent the sale of alcohol to persons under 18 years of age, and a requirement to make available to customers small measures such as half pints or beer or cider or 125ml glasses of wine More information is available in the full consultation document. An explanation of each of these terms can be found on page 20 of the consultation document, in the glossary at the end. Do you want to answer questions on reviewing the mandatory licensing conditions? Please select one option.

Yes

Score

0

Page Score

0

## Page 7: Reviewing the mandatory licensing conditions

Q19. Do you think each of the mandatory licensing conditions is effective in promoting the licensing objectives? For more information on the licensing objectives please see the glossary at the end of the full consultation document. Please select one option (Yes, No, Don't know) from each drop down menu.

	Prevention of crime and disorder	Public safety	Prevention of public nuisance	Protection of children from harm
<b>Irresponsible promotions</b>	No	No	No	No
<b>Dispensing alcohol directly into the mouth</b>	No	Yes	No	No
<b>Mandatory provision of free tap water</b>	No	Yes	No	No
<b>Age verification policy</b>	No	No	No	No

<b>Mandatory provision of small measures</b>	No	Yes	No	No
--	----	-----	----	----

Score

0

Q20. Do you think that the mandatory licensing conditions do enough to target irresponsible promotions in pubs and clubs? Please select one option.

No

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

Unless able to link to crime and disorder to a particular premises, cannot in our opinion be enforced.

Score

0

Q21. Are there other issues related to the licensing objectives which could be tackled through a mandatory licensing condition? Please select one option.

Yes

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

(1) Protection of children – Under 16 not on premises after 10pm Monday to Sunday when persons are consuming alcohol where the primary activity is the sale of alcohol (2) Public Safety – Soft drinks to be priced at a level lower than minimum alcohol purchase (3) Public Safety – Details of alcohol unit information.

Score

0

Q22. Do you think that 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.

No

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

More needs to be done to reduce pre-loading. We would welcome a minimum unit cost and any other measure deemed relevant to help the on-trade with this increasing problem.

Score

0

Page Score

0

## **Page 8: Health as a licensing objective for cumulative impact policies**

Q23. We want to ensure that licensing authorities are able to take alcohol-

related health harms into consideration when making decisions about cumulative impact policies (CIPs) which can be used to manage problems linked to the density of premises in specific areas. 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. We are proposing 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. We expect that those areas with the highest levels of alcohol-related health harm, or fast rising levels of harm from alcohol, will be most likely to use this power. It 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. More information is available in the full consultation document and impact assessment. Do you want to answer questions on health as a licensing objective for cumulative impact policies? Please select one option.

Yes

Score

0

Page Score

0

## Page 9: Health as a licensing objective for cumulative impact policies

Q24. 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):

Evidence that the purchase of alcohol was taking place in the area where there was alcohol related health harm (e.g. alcohol deaths, reports of injuries at particular location and the times taking place and locations of AA centres/treatment centres etc.

Q25. 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.

Don't know

Score

0

Q26. 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 your answer in the box below, providing evidence to support your response (keeping your

views to a maximum of 200 words):

Don't Know – Please see response provided by public health for Medway.

Page Score

0

## Page 10: Freeing up responsible businesses

Q27. The government has committed to consult on giving licensing authorities greater freedom to take decisions that reflect the needs of their local community. Following the government's Red Tape Challenge in 2011, three areas of reform were specified: alcohol licensing for certain types of premises providing minimal alcohol sales, temporary event notices (TENs) and the licensing of late night refreshment. This section asks for views on these proposals and suggests further ways to reduce burdens on business. The proposals set out here can be seen alongside work undertaken by the Department for Culture, Media and Sport to remove unnecessary red tape from regulated entertainment. More information on each of these areas for reform is available in the full consultation document. There are five subjects covered in this section. They are: ancillary sales of alcohol occasional provision of licensable activities at community events an extension of the temporary event notice limit at individual premises late night refreshment, and further proposals to reduce burdens on business Do you want to answer questions on freeing up responsible businesses? Please select one option.

Yes

Score

0

Page Score

0

## Page 11: Freeing up responsible businesses

Q28. Ancillary sales of alcohol For many businesses, the sale of alcohol is only a small part of, or incidental to, their wider activities, and occurs alongside the provision of another product or service (which this consultation refers to as an 'ancillary sale'). For example, a guesthouse might wish to provide wine to its guests with an evening meal or a complimentary bottle of wine in a guest's room, while a hairdresser might wish to offer clients a glass of wine. 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
<b>The provision should be limited to a specific list of certain types of business and the kinds of sales they make</b>	X		

<b>The provision should be available to all businesses providing they meet certain qualification criteria to be an ancillary seller</b>		X	
<b>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 the above options</b>		X	

Score

0

Q29. If special provisions 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.

	Yes	No	Don't know
<b>Accommodation providers, providing alcohol alongside accommodation as part of the contract</b>	X		
<b>Hair and beauty salons, providing alcohol alongside a hair or beauty treatment</b>	X		
<b>Florists, providing alcohol alongside the purchase of flowers</b>			X
<b>Cultural organisations, such as theatres, cinemas and museums, providing alcohol alongside cultural events as part of the entry ticket</b>	X		
<b>Regular charitable events, providing alcohol as part of the wider occasion</b>			X

Score

0

Q30. 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 suggestions in the box below, keeping your views to a maximum of 200 words:

Galleries/Art Exhibitions and Training facilities to allow for welcome drinks and celebration/toast drinks.

Q31. 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. Alternatively, a second option is to broaden the definition of 'ancillary sales' to include all businesses (and/or not for profit activities) through the use of a general set of qualification criteria, for

example, to the effect that: alcohol must be sold or supplied as a small part or proportion of a sales transaction or contract for a wider service, and the amount of alcohol that could be supplied as part of that contract cannot exceed a prescribed amount Do you think that the qualification criteria proposed meet this aim?

Yes

Score

0

Q32. 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
<b>Allow premises making ancillary sales to request in their premises licence application that the requirement for a personal licence holder be removed</b>			X
<b>Introduce a new, light-touch form of authorisation for premises making ancillary sales - an ASN but retaining the need for a personal licence holder</b>	X		
<b>Introduce a new, light touch form of authorisation for premises making ancillary sales - an ASN - with no requirement for a personal licence holder</b>			X

Score

0

Q33. Do you think these proposals would impact adversely on one or more of the licensing objectives? Please select one option.

	Yes	No	Don't know
<b>Allow premises making ancillary sales to request in their premises licence application that the requirement for a personal licence holder be removed</b>			X
<b>Introduce a new, light-touch form of authorisation for premises making ancillary sales - an ASN but retaining the need for a personal licence holder</b>		X	
<b>Introduce a new, light touch form of authorisation for premises making ancillary sales - an ASN - with no requirement for a personal licence holder</b>			X

Score

0

Q34. 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 response to a maximum of 200 words:

Their needs to be clear guidelines on what is and is not appropriate to enable enforcement action to be taken where any breaches occur.

Page Score

0

## Page 12: Freeing up responsible businesses

Q35. 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.

No

Score

0

Q36. 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
Reduce the burden		X	
Increase the burden	X		

Score

0

Page Score

0

## Page 13: Freeing up responsible businesses

Q37. Should the number of TENs which can be given in respect of individual premises be increased? Please select one option.

No

Score

0

Q38. If you answered yes, please select one option to indicate which you would prefer. Please select one option.

Don't know

Score

0

Page Score

0

## Page 14: Freeing up responsible businesses

Q39. 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
<b>Determining that premises in certain areas are exempt</b>		X	
<b>Determining that certain premises types are exempt in their local area</b>	X		

Score

0

Q40. 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

Score

0

Q41. 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).

Remove 'Hot' Drinks as late night refreshment.

Page Score

0

## Page 15: Freeing up responsible businesses

Q42. Do you agree with each of the following proposals? Please select one option in each row.

	Yes	No	Don't know
<b>Remove requirements to advertise licensing applications in local newspapers</b>	X		
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs for the on and off-trade</b>		X	
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs, but only in respect of overnight accommodation - lodges</b>	X		
<b>Remove or simplify requirements to renew personal licences under the 2003 Act</b>		X	

Score

0

Q43. 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
<b>Remove requirements to advertise licensing applications in local newspapers</b>	X		
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs for the on and off-trade</b>			X
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs, but only in respect of overnight accommodation - lodges</b>	X		
<b>Remove or simplify requirements to renew personal licences under the 2003 Act</b>		X	

Score

0

Q44. 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.

	Yes	No	Don't know
<b>Remove requirements to advertise licensing applications in local newspapers</b>		X	
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs for the on and off-trade</b>	X		
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs, but only in respect of overnight accommodation - lodges</b>		X	
<b>Remove or simplify requirements to renew personal licences under the 2003 Act</b>	X		

Score

0

Q45. 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 keep your views to a maximum of 200 words.)

Removal of 'Hot' drinks from Late Night Refreshment.

Page Score

0

## Page 16: Impact assessments

Q46. Impact assessments for the proposals in this consultation have been published alongside the full consultation document. 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
Minimum unit pricing	X		
Multi-buy promotions	X		
Health as a licensing objective for cumulative impact			X
Ancillary sales of alcohol	X		
Temporary event notices	X		
Late night refreshment	X		
Removing the duty to advertise licence applications in a local newspaper	X		
Sales of alcohol at motorway service stations	X		
Personal licences	X		

Score

0

Q47. Do you have any comments on the methodologies or assumptions used in the impact assessments? If yes, please specify in the box below, clearly referencing the impact assessment and page to which you refer (keeping your views to a maximum of 400 words).

No

Page Score

0

## Scoring Summary

Pages	Total
1. About you	0
2. A minimum unit price for alcohol	0
3. A minimum unit price for alcohol	0
4. A ban on multi-buy promotions in the	0

off-trade	
5. A ban on multi-buy promotions in the off-trade	0
6. Reviewing the mandatory licensing conditions	0
7. Reviewing the mandatory licensing conditions	0
8. Health as a licensing objective for cumulative impact policies	0
9. Health as a licensing objective for cumulative impact policies	0
10. Freeing up responsible businesses	0
11. Freeing up responsible businesses	0
12. Freeing up responsible businesses	0
13. Freeing up responsible businesses	0
14. Freeing up responsible businesses	0
15. Freeing up responsible businesses	0
16. Impact assessments	0
<b>Total Survey Score:</b>	<b>0</b>

# Alcohol strategy consultation

---

User Details - 5455745

**Date Started:** 04/02/2013 14:28:21    **Date Ended:** 04/02/2013 16:07:40

**Time taken:** 1 hr, 39 mins, 19 secs    **IP Address:** n/a

**Unique ID:** n/a

---

## Page 1: About you

Q1. Please select if you would like your response or personal details to be treated as confidential.

**No Response**

Score

0

Q2. Which of the following best describes you or the professional interest you represent? Please select one option from the menu below.

Public health body (eg Primary Care Trust, Local Health Board, Director of Public Health)

***Please specify which organisation, licensing authority or police force you represent in the box below:***

NHS Nottinghamshire County

Score

0

Q3. If you are responding on behalf of an organisation or interest group, please write in the box below the number of members in your group or organisation.

1000

Q4. How did you obtain the views of your members? Please explain in the box below keeping your response to a maximum of 100 words.

Email consultation link to all staff in Public Health

Article and link in staff newsletter

Email consultation link to substance misuse commissioning partners

Email link on Nottinghamshire County Council website

Q5. Please indicate in which region you or your organisation is based.

Please select one option from the menu below.

East Midlands

Score

0

Q6. If you are responding as a member of the public, what is your gender? Please select one option.

*No Response*

Score

0

Q7. If you are responding as a member of the public, what is your age?  
Please select one option.

*No Response*

Score

0

Page Score

0

## **Page 2: A minimum unit price for alcohol**

Q8. In the alcohol strategy, the government committed to introducing a minimum unit price for alcohol in England and Wales. This consultation will contribute to the debate on the most appropriate price per unit and the mechanism by which, once set, minimum unit pricing would remain effective. It is also an opportunity for interested parties to raise other issues around minimum unit pricing. The purpose of minimum unit pricing is to reduce alcohol consumption, particularly by the most hazardous and harmful drinkers who tend to show a preference for the cheapest alcohol products. By doing so the government estimates there will be a reduction in the associated crime and health harms, especially the numbers of hospital admissions, alcohol-related deaths and alcohol-related crimes. Minimum unit pricing is not intended disproportionately to affect responsible drinkers or particular social groups but to reduce the availability of alcohol sold at very low or heavily discounted prices. More information (including the definitions of hazardous and harmful drinkers) is available in the full consultation document and the impact assessment. Do you want to answer questions on minimum unit pricing? Please select one option.

Yes

Score

0

Page Score

0

## **Page 3: A minimum unit price for alcohol**

Q9. The impact of minimum unit pricing will depend on the price per unit of alcohol. The government wants to ensure that the chosen price level is targeted and proportionate, whilst achieving a significant reduction of harm. The government is therefore consulting on the introduction of a recommended minimum unit price of 45p. The government estimates a reduction in consumption across all product types of 3.3 per cent, a reduction in crime of 5,240 per year, a reduction in 24,600 alcohol-related hospital admissions and 714 fewer deaths per year after ten years. Do you agree that this minimum unit price level would achieve these aims? Please select one option.

Yes

***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):***

Research shows that 50p per unit would be more effective (SHARR, 2012) based on modelling in Scotland

Score

0

Q10. Should other factors or evidence be considered when setting a minimum unit price for alcohol? Please select one option.

Yes

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

Nottinghamshire has a culture of pre-loading, therefore increasing the minimum unit price would reduce the amount consumed at home prior to a night out. As the minimum price threshold increases alcohol related admissions and deaths are also reduced. Forecast reduction of 5,100 per annum 40p threshold, 6,600 45p and 8,600 for 50p

Score

0

Q11. The government wishes to maintain the effectiveness of minimum unit pricing and is therefore proposing to adjust the minimum unit price level over time. 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 automatically be updated in line with inflation each year

Score

0

Q12. 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

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

under age drinkers (positive effect) Small shops off-trade may not be financially viable (could affect the economic state of some local communities)

Score

0

Page Score

0

## **Page 4: A ban on multi-buy promotions in the off-trade**

Q13. The government is consulting on introducing a ban on multi-buy

promotions in the off-trade (e.g. shops and off-licences) as part of its wider strategy to reduce excessive alcohol consumption, and alongside the introduction of a minimum unit price. A ban on multi-buy promotions would therefore not apply to pubs, clubs, bars or restaurants. The term 'multi-buy promotions' refers to alcohol promotions that offer a discount for buying multiple items. 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. As well as being part of a wider strategy to reduce consumption and tackle irresponsible alcohol sales, a ban on multi-buy promotions would also contribute to the government's aim of encouraging people to be aware of how much they drink and the risks of excessive drinking, so that they can make informed choices. The aim of this consultation is to assess support for such a ban and contribute to our understanding of the impact a ban on multi-buy promotions may have. The types of promotion it is proposed that a ban would include, are: two for the price of one, three for the price of two, buy one get one free, buy six and get 20 per cent off, 24 cans of lager costing less than 24 times the cost of a single 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, 3 for £10 where each bottle costs more than £3.33. More information is available in the full consultation document and the impact assessment. Do you want to answer questions on a ban on multi-buy promotions in the off-trade? Please select one option.

Yes

Score

0

Page Score

0

## Page 5: A ban on multi-buy promotions in the off-trade

Q14. Do you think there should be a ban on multi-buy promotions involving alcohol in the off-trade? Please select one option.

Yes

Score

0

Q15. Are there any further offers which should be included in a ban on multi-buy promotions? Please select one option.

Yes

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

including a 'free' bottle of wine with other deals i.e meals for £10 discount on larger bottles or cases (boxes of wine) products should cost the same per ml regardless of size

Score

0

Q16. Should other factors or evidence be taken into account when considering a ban on multi-buy promotions? Please select one option.

Yes

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

Multi buy should not fall below minimum price per unit

Score

0

Q17. 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

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

Parts of Nottinghamshire have problems with street drinkers, they are attracted to off-licences that sell cheap strong strength alcohol purchased as multi buy's ie white cider pre-loaders will be affected. Licensed premises report customers who are already drunk as they arrive in taxi's and bringing 'cheap' alcohol from home into the premises with them

Score

0

Page Score

0

## **Page 6: Reviewing the mandatory licensing conditions**

Q18. 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 alcohol 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. The government has also committed to consult on whether these mandatory licensing conditions should, where relevant, apply to both the on- and off-trade. This consultation forms part of that review, and will contribute to the government's understanding of how these mandatory conditions are perceived. The five mandatory licensing conditions currently set out in regulations in relation to the supply of alcohol are: a ban on irresponsible promotionsa ban on dispensing alcohol by one person directly into the mouth of anothera requirement to provide free tap water on request to customersa requirement to have an age verification policy to prevent the sale of alcohol to persons under 18 years of age, anda requirement to make available to customers small measures such as half pints or beer or cider or 125ml glasses of wine More information is available in the full consultation document. An explanation of each of these terms can be found on page 20

of the consultation document, in the glossary at the end. Do you want to answer questions on reviewing the mandatory licensing conditions? Please select one option.

Yes

Score

0

Page Score

0

## Page 7: Reviewing the mandatory licensing conditions

Q19. Do you think each of the mandatory licensing conditions is effective in promoting the licensing objectives? For more information on the licensing objectives please see the glossary at the end of the full consultation document. Please select one option (Yes, No, Don't know) from each drop down menu.

	Prevention of crime and disorder	Public safety	Prevention of public nuisance	Protection of children from harm
Irresponsible promotions	Yes	Yes	Yes	Yes
Dispensing alcohol directly into the mouth	Yes	Yes	Yes	Yes
Mandatory provision of free tap water	Yes	Yes	Yes	Yes
Age verification policy	Yes	Yes	Yes	Yes
Mandatory provision of small measures	Yes	Yes	Yes	Yes

Score

0

Q20. Do you think that the mandatory licensing conditions do enough to target irresponsible promotions in pubs and clubs? Please select one option.

No

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

There should be better clarity around what an irresponsible drinks

promotion is - currently too ambiguous

Score

0

Q21. Are there other issues related to the licensing objectives which could be tackled through a mandatory licensing condition? Please select one option.

Yes

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

Motorway service stations and petrol stations should not have alcohol for sale or supply as this gives a confused message about drink driving

Score

0

Q22. Do you think that 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.

No

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

Should apply to both on and off trade, especially around irresponsible drinks promotions Default position should be to serve the smallest size unless a large one is ordered. CIP should extend to one and off trade, in Nottinghamshire some areas are saturated with off trade competing to sell cheap alcohol

Score

0

Page Score

0

## **Page 8: Health as a licensing objective for cumulative impact policies**

Q23. We want to ensure that licensing authorities are able to take alcohol-related health harms into consideration when making decisions about cumulative impact policies (CIPs) which can be used to manage problems linked to the density of premises in specific areas. 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. We are proposing 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. We expect that those areas with the highest levels of alcohol-related health harm, or fast rising levels of harm from alcohol, will be most

likely to use this power. It 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. More information is available in the full consultation document and impact assessment. Do you want to answer questions on health as a licensing objective for cumulative impact policies? Please select one option.

Yes

Score

0

Page Score

0

## Page 9: Health as a licensing objective for cumulative impact policies

Q24. 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):

Health specific data should be used - alcohol related ED attendances and admissions (all ages), ambulance calls, types and numbers of drinkers seen in primary care (NHS Healthcheck data), incidence of alcohol disease and related morbidity/mortality.

Links to poly drug use

Q25. 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

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

Public health needs to be a licensing objective for any impact to be made. the current role as a responsible authority is too limiting. It is incredibly difficult to use the ED violent crime data and apply to an individual licence application, use of geographical data to influence a CIP makes so much more sense

Score

0

Q26. 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 your answer in the box below, providing evidence to support your response (keeping your views to a maximum of 200 words):

It could have a considerable impact would allow licensing decisions to be made with a much more rounded picture and a real sense of the impacts locally

Page Score

0

## Page 10: Freeing up responsible businesses

Q27. The government has committed to consult on giving licensing authorities greater freedom to take decisions that reflect the needs of their local community. Following the government's Red Tape Challenge in 2011, three areas of reform were specified: alcohol licensing for certain types of premises providing minimal alcohol sales, temporary event notices (TENs) and the licensing of late night refreshment. This section asks for views on these proposals and suggests further ways to reduce burdens on business. The proposals set out here can be seen alongside work undertaken by the Department for Culture, Media and Sport to remove unnecessary red tape from regulated entertainment. More information on each of these areas for reform is available in the full consultation document. There are five subjects covered in this section. They are: ancillary sales of alcohol occasional provision of licensable activities at community events an extension of the temporary event notice limit at individual premises late night refreshment, and further proposals to reduce burdens on business Do you want to answer questions on freeing up responsible businesses? Please select one option.

Yes

Score

0

Page Score

0

## Page 11: Freeing up responsible businesses

Q28. Ancillary sales of alcohol For many businesses, the sale of alcohol is only a small part of, or incidental to, their wider activities, and occurs alongside the provision of another product or service (which this consultation refers to as an 'ancillary sale'). For example, a guesthouse might wish to provide wine to its guests with an evening meal or a complimentary bottle of wine in a guest's room, while a hairdresser might wish to offer clients a glass of wine. 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
<b>The provision should be limited to a specific list of certain types of business and the kinds of sales they make</b>		X	
<b>The provision should be available to all businesses providing they meet certain qualification criteria to be an ancillary seller</b>	X		

<b>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 the above options</b>		X	
--	--	---	--

Score

0

Q29. If special provisions 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.

	Yes	No	Don't know
<b>Accommodation providers, providing alcohol alongside accommodation as part of the contract</b>		X	
<b>Hair and beauty salons, providing alcohol alongside a hair or beauty treatment</b>		X	
<b>Florists, providing alcohol alongside the purchase of flowers</b>	X		
<b>Cultural organisations, such as theatres, cinemas and museums, providing alcohol alongside cultural events as part of the entry ticket</b>		X	
<b>Regular charitable events, providing alcohol as part of the wider occasion</b>		X	

Score

0

Q30. 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 suggestions in the box below, keeping your views to a maximum of 200 words:

**No Response**

Q31. 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. Alternatively, a second option is to broaden the definition of 'ancillary sales' to include all businesses (and/or not for profit activities) through the use of a general set of qualification criteria, for example, to the effect that: alcohol must be sold or supplied as a small part or proportion of a sales transaction or contract for a wider service, and the amount of alcohol that could be supplied as part of that contract cannot exceed a prescribed amount. Do you think that the qualification criteria

proposed meet this aim?

No

***Please use the space below to provide further comments (keeping your views to a maximum of 200 words):***

clear definitions needed on what constitutes a sale and what amounts can be supplied

Score

0

Q32. Do you think that these proposals would significantly reduce the burdens on ancillary sellers? Please select one option in each row.

**No Response**

Score

0

Q33. Do you think these proposals would impact adversely on one or more of the licensing objectives? Please select one option.

	Yes	No	Don't know
<b>Allow premises making ancillary sales to request in their premises licence application that the requirement for a personal licence holder be removed</b>	X		
<b>Introduce a new, light-touch form of authorisation for premises making ancillary sales - an ASN but retaining the need for a personal licence holder</b>		X	
<b>Introduce a new, light touch form of authorisation for premises making ancillary sales - an ASN - with no requirement for a personal licence holder</b>	X		

Score

0

Q34. 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 response to a maximum of 200 words:

**No Response**

Page Score

0

## **Page 12: Freeing up responsible businesses**

Q35. 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

Score

0

Q36. 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
<b>Reduce the burden</b>			X
<b>Increase the burden</b>			X

Score

0

Page Score

0

## Page 13: Freeing up responsible businesses

Q37. Should the number of TENs which can be given in respect of individual premises be increased? Please select one option.

No

Score

0

Q38. If you answered yes, please select one option to indicate which you would prefer. Please select one option.

*No Response*

Score

0

Page Score

0

## Page 14: Freeing up responsible businesses

Q39. 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
<b>Determining that premises in certain areas are exempt</b>		X	
<b>Determining that certain premises types are exempt in their local area</b>		X	

Score

0

Q40. 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

Score

0

Q41. 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).

*No Response*

Page Score

0

## Page 15: Freeing up responsible businesses

Q42. Do you agree with each of the following proposals? Please select one option in each row.

	Yes	No	Don't know
<b>Remove requirements to advertise licensing applications in local newspapers</b>	X		
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs for the on and off-trade</b>		X	
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs, but only in respect of overnight accommodation - lodges</b>		X	
<b>Remove or simplify requirements to renew personal licences under the 2003 Act</b>		X	

Score

0

Q43. 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
<b>Remove requirements to advertise licensing applications in local newspapers</b>	X		
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs for the on and off-trade</b>		X	
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs, but only in respect of overnight accommodation - lodges</b>		X	
<b>Remove or simplify requirements to renew personal licences under the 2003 Act</b>		X	

Score

0

Q44. 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.

	Yes	No	Don't know
<b>Remove requirements to advertise licensing applications in local newspapers</b>		X	
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs for the on and off-trade</b>	X		
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs, but only in respect of overnight accommodation - lodges</b>	X		
<b>Remove or simplify requirements to renew personal licences under the 2003 Act</b>	X		

Score

0

Q45. 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 keep your views to a maximum of 200 words.)

*No Response*

Page Score

0

## Page 16: Impact assessments

Q46. Impact assessments for the proposals in this consultation have been published alongside the full consultation document. 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
<b>Minimum unit pricing</b>		X	
<b>Multi-buy promotions</b>		X	
<b>Health as a licensing objective for cumulative impact</b>		X	
<b>Ancillary sales of alcohol</b>		X	
<b>Temporary event notices</b>		X	

<b>Late night refreshment</b>		X	
<b>Removing the duty to advertise licence applications in a local newspaper</b>		X	
<b>Sales of alcohol at motorway service stations</b>		X	
<b>Personal licences</b>		X	

Score

0

Q47. Do you have any comments on the methodologies or assumptions used in the impact assessments? If yes, please specify in the box below, clearly referencing the impact assessment and page to which you refer (keeping your views to a maximum of 400 words).

*No Response*

Page Score

0

## Scoring Summary

Pages	Total
1. About you	0
2. A minimum unit price for alcohol	0
3. A minimum unit price for alcohol	0
4. A ban on multi-buy promotions in the off-trade	0
5. A ban on multi-buy promotions in the off-trade	0
6. Reviewing the mandatory licensing conditions	0
7. Reviewing the mandatory licensing conditions	0
8. Health as a licensing objective for cumulative impact policies	0
9. Health as a licensing objective for cumulative impact policies	0
10. Freeing up responsible businesses	0

11. Freeing up responsible businesses	0
12. Freeing up responsible businesses	0
13. Freeing up responsible businesses	0
14. Freeing up responsible businesses	0
15. Freeing up responsible businesses	0
16. Impact assessments	0
<b>Total Survey Score:</b>	0

# Alcohol strategy consultation

User Details - 5456526

**Date Started:** 04/02/2013 15:45:28    **Date Ended:** 04/02/2013 16:07:46

**Time taken:** 22 mins, 18 secs    **IP Address:** n/a

**Unique ID:** n/a

## Page 1: About you

Q1. Please select if you would like your response or personal details to be treated as confidential.

*No Response*

Score

0

Q2. Which of the following best describes you or the professional interest you represent? Please select one option from the menu below.

Licensing authority

***Please specify which organisation, licensing authority or police force you represent in the box below:***

Bracknell Forest Council

Score

0

Q3. If you are responding on behalf of an organisation or interest group, please write in the box below the number of members in your group or organisation.

*No Response*

Q4. How did you obtain the views of your members? Please explain in the box below keeping your response to a maximum of 100 words.

*No Response*

Q5. Please indicate in which region you or your organisation is based.

Please select one option from the menu below.

South East England

Score

0

Q6. If you are responding as a member of the public, what is your gender? Please select one option.

*No Response*

Score

0

Q7. If you are responding as a member of the public, what is your age? Please select one option.

No Response

Score

0

Page Score

0

## Page 2: A minimum unit price for alcohol

Q8. In the alcohol strategy, the government committed to introducing a minimum unit price for alcohol in England and Wales. This consultation will contribute to the debate on the most appropriate price per unit and the mechanism by which, once set, minimum unit pricing would remain effective. It is also an opportunity for interested parties to raise other issues around minimum unit pricing. The purpose of minimum unit pricing is to reduce alcohol consumption, particularly by the most hazardous and harmful drinkers who tend to show a preference for the cheapest alcohol products. By doing so the government estimates there will be a reduction in the associated crime and health harms, especially the numbers of hospital admissions, alcohol-related deaths and alcohol-related crimes. Minimum unit pricing is not intended disproportionately to affect responsible drinkers or particular social groups but to reduce the availability of alcohol sold at very low or heavily discounted prices. More information (including the definitions of hazardous and harmful drinkers) is available in the full consultation document and the impact assessment. Do you want to answer questions on minimum unit pricing? Please select one option.

Yes

Score

0

Page Score

0

## Page 3: A minimum unit price for alcohol

Q9. The impact of minimum unit pricing will depend on the price per unit of alcohol. The government wants to ensure that the chosen price level is targeted and proportionate, whilst achieving a significant reduction of harm. The government is therefore consulting on the introduction of a recommended minimum unit price of 45p. The government estimates a reduction in consumption across all product types of 3.3 per cent, a reduction in crime of 5,240 per year, a reduction in 24,600 alcohol-related hospital admissions and 714 fewer deaths per year after ten years. Do you agree that this minimum unit price level would achieve these aims? Please select one option.

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):***

We accept that it is possible that the chosen minimum unit price (45p) may achieve a significant reduction of harm. It is accepted that the MUP will not

necessarily prevent binge-drinking, and there is a potential that it will prejudice the majority of people who are responsible drinkers. However on balance, given the continued rise in alcohol-related hospital admissions the MUP may help to reduce the overall consumption of alcohol across the population, in particular low-cost and high strength alcohol and reduce the cost to society from the associated abuse.

Score

0

Q10. Should other factors or evidence be considered when setting a minimum unit price for alcohol? Please select one option.

Yes

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

We are not aware of any other factors that ought to be considered, other than that free market trade at responsible prices should not be impacted.

Score

0

Q11. The government wishes to maintain the effectiveness of minimum unit pricing and is therefore proposing to adjust the minimum unit price level over time. 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

Score

0

Q12. 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

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

There will clearly be an impact on licensed businesses, in particular the off-trade.

Score

0

Page Score

0

## **Page 4: A ban on multi-buy promotions in the off-trade**

Q13. The government is consulting on introducing a ban on multi-buy promotions in the off-trade (e.g. shops and off-licences) as part of its wider strategy to reduce excessive alcohol consumption, and alongside the introduction of a minimum unit price. A ban on multi-buy promotions would therefore not apply to pubs, clubs, bars or restaurants. The term 'multi-buy

promotions' refers to alcohol promotions that offer a discount for buying multiple items. 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. As well as being part of a wider strategy to reduce consumption and tackle irresponsible alcohol sales, a ban on multi-buy promotions would also contribute to the government's aim of encouraging people to be aware of how much they drink and the risks of excessive drinking, so that they can make informed choices. The aim of this consultation is to assess support for such a ban and contribute to our understanding of the impact a ban on multi-buy promotions may have. The types of promotion it is proposed that a ban would include, are: two for the price of one, three for the price of two, buy one get one free, buy six and get 20 per cent off, 24 cans of lager costing less than 24 times the cost of a single 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, 3 for £10 where each bottle costs more than £3.33. More information is available in the full consultation document and the impact assessment. Do you want to answer questions on a ban on multi-buy promotions in the off-trade? Please select one option.

Yes

Score

0

Page Score

0

## Page 5: A ban on multi-buy promotions in the off-trade

Q14. Do you think there should be a ban on multi-buy promotions involving alcohol in the off-trade? Please select one option.

Yes

Score

0

Q15. Are there any further offers which should be included in a ban on multi-buy promotions? Please select one option.

Yes

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

We believe that there should be a ban on multi-buy promotions, as this may assist in a reduction in bulk-buying of cheap, high strength alcohol. It is, however, noted that the retailer will still be able to offer discounts such as half price offers, so there is concern that this proposal may not achieve its proposed aims. We believe that there should be no distinction between the on and off trades in respect of multi-buy promotions, and that multi-buy promotions should not be linked with any other special offers.

Score

0

Q16. Should other factors or evidence be taken into account when considering a ban on multi-buy promotions? Please select one option.

No

Score

0

Q17. 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

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

We are not aware of any other groups that could be affected, other than responsible groups taking advantage of offers who may be adversely affected.

Score

0

Page Score

0

## **Page 6: Reviewing the mandatory licensing conditions**

Q18. 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 alcohol 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. The government has also committed to consult on whether these mandatory licensing conditions should, where relevant, apply to both the on- and off-trade. This consultation forms part of that review, and will contribute to the government's understanding of how these mandatory conditions are perceived. The five mandatory licensing conditions currently set out in regulations in relation to the supply of alcohol are: a ban on irresponsible promotionsa ban on dispensing alcohol by one person directly into the mouth of anothera requirement to provide free tap water on request to customersa requirement to have an age verification policy to prevent the sale of alcohol to persons under 18 years of age, anda requirement to make available to customers small measures such as half pints or beer or cider or 125ml glasses of wine More information is available in the full consultation document. An explanation of each of these terms can be found on page 20 of the consultation document, in the glossary at the end. Do you want to answer questions on reviewing the mandatory licensing conditions? Please select one option.

Yes

Score

0

Page Score

0

## Page 7: Reviewing the mandatory licensing conditions

Q19. Do you think each of the mandatory licensing conditions is effective in promoting the licensing objectives? For more information on the licensing objectives please see the glossary at the end of the full consultation document. Please select one option (Yes, No, Don't know) from each drop down menu.

	Prevention of crime and disorder	Public safety	Prevention of public nuisance	Protection of children from harm
<b>Irresponsible promotions</b>	Don't know	Don't know	Don't know	Don't know
<b>Dispensing alcohol directly into the mouth</b>	Don't know	Don't know	Don't know	Don't know
<b>Mandatory provision of free tap water</b>	Don't know	Don't know	Don't know	Don't know
<b>Age verification policy</b>	Don't know	Don't know	Don't know	Don't know
<b>Mandatory provision of small measures</b>	Don't know	Don't know	Don't know	Don't know

Score

0

Q20. Do you think that the mandatory licensing conditions do enough to target irresponsible promotions in pubs and clubs? Please select one option.

No

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

We have not had cause to take action against any licensed premises in respect of breaches of any of the new mandatory licensing conditions that took effect in 2010. Therefore we have no comment on whether they are effective other than they appear sufficient but need further time to embed.

Score

0

Q21. Are there other issues related to the licensing objectives which could be tackled through a mandatory licensing condition? Please select one option.

Yes

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

We are not aware of other issues which could be tackled through further mandatory licence conditions and are satisfied that the current mandatory conditions available plus the ability to impose additional conditions is adequate.

Score

0

Q22. Do you think that 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.

**No Response**

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

We are satisfied with the current mandatory conditions and the ability to impose additional conditions if appropriate.

Score

0

Page Score

0

## **Page 8: Health as a licensing objective for cumulative impact policies**

Q23. We want to ensure that licensing authorities are able to take alcohol-related health harms into consideration when making decisions about cumulative impact policies (CIPs) which can be used to manage problems linked to the density of premises in specific areas. 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. We are proposing 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. We expect that those areas with the highest levels of alcohol-related health harm, or fast rising levels of harm from alcohol, will be most likely to use this power. It 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. More information is available in the full consultation document

and impact assessment. Do you want to answer questions on health as a licensing objective for cumulative impact policies? Please select one option.

Yes

Score

0

Page Score

0

## **Page 9: Health as a licensing objective for cumulative impact policies**

Q24. 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):

It could be of assistance to consider statistics from Ambulance Service to call-outs to a particular area involving injuries directly associated with consumption of alcohol, individual (anonymised) medical records or probation service data.

Q25. 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.

No

Score

0

Q26. 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 your answer in the box below, providing evidence to support your response (keeping your views to a maximum of 200 words):

Evidence could support the need for a CIP if it is shown there is a high level of incidents of injury in any given area where the injured party or aggressor are known to have consumed alcohol, in particular excessive amounts.

Page Score

0

## **Page 10: Freeing up responsible businesses**

Q27. The government has committed to consult on giving licensing authorities greater freedom to take decisions that reflect the needs of their local community. Following the government's Red Tape Challenge in 2011, three areas of reform were specified: alcohol licensing for certain types of premises providing minimal alcohol sales, temporary event notices (TENs) and the licensing of late night refreshment. This section asks for views on these proposals and suggests further ways to reduce burdens on business. The proposals set out here can be seen alongside work undertaken by the Department for Culture, Media and Sport to remove unnecessary red tape from regulated entertainment. More information on each of these areas for reform is available in the full consultation document. There are five subjects

covered in this section. They are: ancillary sales of alcohol occasional provision of licensable activities at community events an extension of the temporary event notice limit at individual premises late night refreshment, and further proposals to reduce burdens on business Do you want to answer questions on freeing up responsible businesses? Please select one option.

Yes

Score

0

Page Score

0

## Page 11: Freeing up responsible businesses

Q28. Ancillary sales of alcohol For many businesses, the sale of alcohol is only a small part of, or incidental to, their wider activities, and occurs alongside the provision of another product or service (which this consultation refers to as an 'ancillary sale'). For example, a guesthouse might wish to provide wine to its guests with an evening meal or a complimentary bottle of wine in a guest's room, while a hairdresser might wish to offer clients a glass of wine. 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
<b>The provision should be limited to a specific list of certain types of business and the kinds of sales they make</b>	X		
<b>The provision should be available to all businesses providing they meet certain qualification criteria to be an ancillary seller</b>		X	
<b>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 the above options</b>		X	

Score

0

Q29. If special provisions 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.

	Yes	No	Don't know

<b>Accommodation providers, providing alcohol alongside accommodation as part of the contract</b>	X		
<b>Hair and beauty salons, providing alcohol alongside a hair or beauty treatment</b>	X		
<b>Florists, providing alcohol alongside the purchase of flowers</b>	X		
<b>Cultural organisations, such as theatres, cinemas and museums, providing alcohol alongside cultural events as part of the entry ticket</b>	X		
<b>Regular charitable events, providing alcohol as part of the wider occasion</b>		X	

Score

0

Q30. 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 suggestions in the box below, keeping your views to a maximum of 200 words:

We do not feel it would be appropriate for this provision to apply to charitable events, without a clearer definition of what types of events would be included. We do not feel it would be appropriate to allow theatres and cinemas this provision unless the amount of alcohol was limited to a specified amount. There may be potential for businesses such as delicatessens that may offer a single glass of wine could be considered.

Q31. 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. Alternatively, a second option is to broaden the definition of 'ancillary sales' to include all businesses (and/or not for profit activities) through the use of a general set of qualification criteria, for example, to the effect that: alcohol must be sold or supplied as a small part or proportion of a sales transaction or contract for a wider service, and the amount of alcohol that could be supplied as part of that contract cannot exceed a prescribed amount. Do you think that the qualification criteria proposed meet this aim?

Yes

***Please use the space below to provide further comments (keeping your views to a maximum of 200 words):***

It is noted that paragraph 9.6 would require the alcohol be sold or supplied as a small part of a sales transaction or contract for a wider service, and that the amount of alcohol that could be supplied cannot exceed a prescribed amount. These criteria would seem adequate to ensure a

reduction of burden on responsible businesses.

Score

0

Q32. 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
<b>Allow premises making ancillary sales to request in their premises licence application that the requirement for a personal licence holder be removed</b>	X		
<b>Introduce a new, light-touch form of authorisation for premises making ancillary sales - an ASN but retaining the need for a personal licence holder</b>	X		
<b>Introduce a new, light touch form of authorisation for premises making ancillary sales - an ASN - with no requirement for a personal licence holder</b>	X		

Score

0

Q33. Do you think these proposals would impact adversely on one or more of the licensing objectives? Please select one option.

	Yes	No	Don't know
<b>Allow premises making ancillary sales to request in their premises licence application that the requirement for a personal licence holder be removed</b>		X	
<b>Introduce a new, light-touch form of authorisation for premises making ancillary sales - an ASN but retaining the need for a personal licence holder</b>		X	
<b>Introduce a new, light touch form of authorisation for premises making ancillary sales - an ASN - with no requirement for a personal licence holder</b>		X	

Score

0

Q34. 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 response to a maximum of 200 words:

We do not have concerns in respect of the proposals, provided there is a facility to review the ancillary seller status and impose more restrictive

requirements in respect of problem premises.

Page Score

0

## Page 12: Freeing up responsible businesses

Q35. 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.

No

Score

0

Q36. 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
Reduce the burden		X	
Increase the burden		X	

Score

0

Page Score

0

## Page 13: Freeing up responsible businesses

Q37. Should the number of TENS which can be given in respect of individual premises be increased? Please select one option.

Yes

Score

0

Q38. If you answered yes, please select one option to indicate which you would prefer. Please select one option.

15

Score

0

Page Score

0

## Page 14: Freeing up responsible businesses

Q39. 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
Determining that premises in certain areas are exempt		X	

<b>Determining that certain premises types are exempt in their local area</b>		X	
---	--	---	--

Score

0

Q40. 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

Score

0

Q41. 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).

Charity-run premises which sell hot food and drink

Page Score

0

## Page 15: Freeing up responsible businesses

Q42. Do you agree with each of the following proposals? Please select one option in each row.

	Yes	No	Don't know
<b>Remove requirements to advertise licensing applications in local newspapers</b>	X		
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs for the on and off-trade</b>	X		
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs, but only in respect of overnight accommodation - lodges</b>	X		
<b>Remove or simplify requirements to renew personal licences under the 2003 Act</b>		X	

Score

0

Q43. 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
<b>Remove requirements to advertise licensing applications in local newspapers</b>	X		
<b>Remove the centrally imposed prohibition on the</b>	X		

<b>sale of alcohol at MSAs for the on and off-trade</b>			
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs, but only in respect of overnight accommodation - lodges</b>	X		
<b>Remove or simplify requirements to renew personal licences under the 2003 Act</b>			X

Score

0

Q44. 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.

	Yes	No	Don't know
<b>Remove requirements to advertise licensing applications in local newspapers</b>		X	
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs for the on and off-trade</b>		X	
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs, but only in respect of overnight accommodation - lodges</b>		X	
<b>Remove or simplify requirements to renew personal licences under the 2003 Act</b>	X		

Score

0

Q45. 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 keep your views to a maximum of 200 words.)

The current system for temporary event notices is adequate, but changes could be made to simplify the system, including a radical overhaul of the form which is currently far too long and complex.

Page Score

0

## Page 16: Impact assessments

Q46. Impact assessments for the proposals in this consultation have been published alongside the full consultation document. 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
<b>Minimum unit pricing</b>			X
<b>Multi-buy promotions</b>			X
<b>Health as a licensing objective for cumulative impact</b>			X
<b>Ancillary sales of alcohol</b>			X
<b>Temporary event notices</b>			X
<b>Late night refreshment</b>			X
<b>Removing the duty to advertise licence applications in a local newspaper</b>			X
<b>Sales of alcohol at motorway service stations</b>			X
<b>Personal licences</b>			X

Score

0

Q47. Do you have any comments on the methodologies or assumptions used in the impact assessments? If yes, please specify in the box below, clearly referencing the impact assessment and page to which you refer (keeping your views to a maximum of 400 words).

None

Page Score

0

## Scoring Summary

Pages	Total
1. About you	0
2. A minimum unit price for alcohol	0
3. A minimum unit price for alcohol	0
4. A ban on multi-buy promotions in the off-trade	0
5. A ban on multi-buy promotions in the off-trade	0

6. Reviewing the mandatory licensing conditions	0
7. Reviewing the mandatory licensing conditions	0
8. Health as a licensing objective for cumulative impact policies	0
9. Health as a licensing objective for cumulative impact policies	0
10. Freeing up responsible businesses	0
11. Freeing up responsible businesses	0
12. Freeing up responsible businesses	0
13. Freeing up responsible businesses	0
14. Freeing up responsible businesses	0
15. Freeing up responsible businesses	0
16. Impact assessments	0
<b>Total Survey Score:</b>	<b>0</b>

# Alcohol strategy consultation

User Details - 5454950

**Date Started:** 04/02/2013 13:10:40    **Date Ended:** 04/02/2013 16:29:14

**Time taken:** 3 hrs, 18 mins, 34 secs    **IP Address:** n/a

**Unique ID:** n/a

## Page 1: About you

Q1. Please select if you would like your response or personal details to be treated as confidential.

*No Response*

Score

0

Q2. Which of the following best describes you or the professional interest you represent? Please select one option from the menu below.

Local government (other)

***Please specify which organisation, licensing authority or police force you represent in the box below:***

Thurrock Community Safety Partnership with responses collated from DAAT, licensing and trading standards

Score

0

Q3. If you are responding on behalf of an organisation or interest group, please write in the box below the number of members in your group or organisation.

*No Response*

Q4. How did you obtain the views of your members? Please explain in the box below keeping your response to a maximum of 100 words.

as a group we worked through the document

Q5. Please indicate in which region you or your organisation is based.

Please select one option from the menu below.

East of England

Score

0

Q6. If you are responding as a member of the public, what is your gender? Please select one option.

*No Response*

Score

0

Q7. If you are responding as a member of the public, what is your age?

Please select one option.

**No Response**

Score

0

Page Score

0

## Page 2: A minimum unit price for alcohol

Q8. In the alcohol strategy, the government committed to introducing a minimum unit price for alcohol in England and Wales. This consultation will contribute to the debate on the most appropriate price per unit and the mechanism by which, once set, minimum unit pricing would remain effective. It is also an opportunity for interested parties to raise other issues around minimum unit pricing. The purpose of minimum unit pricing is to reduce alcohol consumption, particularly by the most hazardous and harmful drinkers who tend to show a preference for the cheapest alcohol products. By doing so the government estimates there will be a reduction in the associated crime and health harms, especially the numbers of hospital admissions, alcohol-related deaths and alcohol-related crimes. Minimum unit pricing is not intended disproportionately to affect responsible drinkers or particular social groups but to reduce the availability of alcohol sold at very low or heavily discounted prices. More information (including the definitions of hazardous and harmful drinkers) is available in the full consultation document and the impact assessment. Do you want to answer questions on minimum unit pricing? Please select one option.

Yes

Score

0

Page Score

0

## Page 3: A minimum unit price for alcohol

Q9. The impact of minimum unit pricing will depend on the price per unit of alcohol. The government wants to ensure that the chosen price level is targeted and proportionate, whilst achieving a significant reduction of harm. The government is therefore consulting on the introduction of a recommended minimum unit price of 45p. The government estimates a reduction in consumption across all product types of 3.3 per cent, a reduction in crime of 5,240 per year, a reduction in 24,600 alcohol-related hospital admissions and 714 fewer deaths per year after ten years. Do you agree that this minimum unit price level would achieve these aims? Please select one option.

No

***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):***

We believe that that this level is too low and wouldn't have the desired

impact and wouldn't deter those with significant drinking problems. There is a potential risk to increase counterfeit and smuggled alcohol sales. We recommend wait on outcomes from Scotland

Score

0

Q10. Should other factors or evidence be considered when setting a minimum unit price for alcohol? Please select one option.

Yes

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

1. How is this going to be enforced and by who? e.g. licensing, Police, public health, trading standards? What additional powers would they be given? 2. What would the penalty be? 3. How enforce difference between advertised and sold price? 4. With dwindling resources is this an effective use of the enforcers e.g. TS, Police? 5. This wouldn't stop people pre-loading before they go out 6. Need to look at how enforce those intoxicated buying alcohol more

Score

0

Q11. The government wishes to maintain the effectiveness of minimum unit pricing and is therefore proposing to adjust the minimum unit price level over time. 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

Score

0

Q12. 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

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

Impact retail and local businesses

Score

0

Page Score

0

## **Page 4: A ban on multi-buy promotions in the off-trade**

Q13. The government is consulting on introducing a ban on multi-buy promotions in the off-trade (e.g. shops and off-licences) as part of its wider strategy to reduce excessive alcohol consumption, and alongside the introduction of a minimum unit price. A ban on multi-buy promotions would

therefore not apply to pubs, clubs, bars or restaurants. The term 'multi-buy promotions' refers to alcohol promotions that offer a discount for buying multiple items. 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. As well as being part of a wider strategy to reduce consumption and tackle irresponsible alcohol sales, a ban on multi-buy promotions would also contribute to the government's aim of encouraging people to be aware of how much they drink and the risks of excessive drinking, so that they can make informed choices. The aim of this consultation is to assess support for such a ban and contribute to our understanding of the impact a ban on multi-buy promotions may have. The types of promotion it is proposed that a ban would include, are: two for the price of one, three for the price of two, buy one get one free, buy six and get 20 per cent off, 24 cans of lager costing less than 24 times the cost of a single 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, 3 for £10 where each bottle costs more than £3.33. More information is available in the full consultation document and the impact assessment. Do you want to answer questions on a ban on multi-buy promotions in the off-trade? Please select one option.

Yes

Score

0

Page Score

0

## Page 5: A ban on multi-buy promotions in the off-trade

Q14. Do you think there should be a ban on multi-buy promotions involving alcohol in the off-trade? Please select one option.

Yes

Score

0

Q15. Are there any further offers which should be included in a ban on multi-buy promotions? Please select one option.

Yes

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

We agree that half price offers are better than multi buys as reduce the quantity bought. Minimum quantity purchase should be included i.e. not the proposal in 6.5

Score

0

Q16. Should other factors or evidence be taken into account when considering a ban on multi-buy promotions? Please select one option.

Yes

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

1. look at temporary relaxations around celebratory events e.g. when license hours relaxed, such as Christmas, Queens jubilee to allow retailers to profit 2. Are teh options listed practically enforceable and would it be given priority?

Score

0

Q17. 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

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

retailers and potntially lead to incerase in counterfeit and smuggled alcohol. Also a loss of business to teh independent retailers, unlikley to impact the multiples.

Score

0

Page Score

0

## **Page 6: Reviewing the mandatory licensing conditions**

Q18. 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 alcohol 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. The government has also committed to consult on whether these mandatory licensing conditions should, where relevant, apply to both the on- and off-trade. This consultation forms part of that review, and will contribute to the government's understanding of how these mandatory conditions are perceived. The five mandatory licensing conditions currently set out in regulations in relation to the supply of alcohol are: a ban on irresponsible promotionsa ban on dispensing alcohol by one person directly into the mouth of anothera requirement to provide free tap water on request to customersa requirement to have an age verification policy to prevent the sale of alcohol to persons under 18 years of age, anda requirement to make available to customers small measures such as half pints or beer or cider or 125ml glasses of wine More information is available in the full consultation document. An explanation of each of these terms can be found on page 20 of the consultation document, in the glossary at the end. Do you want to answer questions on reviewing the mandatory licensing conditions? Please

select one option.

Yes

Score

0

Page Score

0

## Page 7: Reviewing the mandatory licensing conditions

Q19. Do you think each of the mandatory licensing conditions is effective in promoting the licensing objectives? For more information on the licensing objectives please see the glossary at the end of the full consultation document. Please select one option (Yes, No, Don't know) from each drop down menu.

	Prevention of crime and disorder	Public safety	Prevention of public nuisance	Protection of children from harm
Irresponsible promotions	Yes	Yes	No	No
Dispensing alcohol directly into the mouth	Yes	Yes	No	No
Mandatory provision of free tap water	Yes	Yes	No	No
Age verification policy	No	No	No	Yes
Mandatory provision of small measures	No	No	No	No

Score

0

Q20. Do you think that the mandatory licensing conditions do enough to target irresponsible promotions in pubs and clubs? Please select one option.

No

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

In response to A above - irresponsible promotions, would only partially prevent crime and disorder It isn't prescriptive enough and has too many loopholes, particularly around dispensing of alcohol Min age verification

policy should be set e.g. 21 or challenge 25. Age verification however has no impact when getting from home and we believe proxy sales are a greater problem. There needs to be minimum mandatory training requirements for anyone selling alcohol as off sales. Review responsible promotions for licensee to have onus to prove they are responsible rather than for enforcement to prove they are irresponsible.

Score

0

Q21. Are there other issues related to the licensing objectives which could be tackled through a mandatory licensing condition? Please select one option.

Yes

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

1. Challenge 25 to be mandatory 2. training on policies to be mandatory with minimum criteria set 3. designated premises supervisor must be present on the premises for a minimum required amount of time or a second person designated 4. alcohol sold for off sales must be in sealed containers

Score

0

Q22. Do you think that 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.

**No Response**

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

Additional mandatory conditions are required and should be applied to off sales as well, i.e. challenge 25 and mandatory training

Score

0

Page Score

0

## **Page 8: Health as a licensing objective for cumulative impact policies**

Q23. We want to ensure that licensing authorities are able to take alcohol-related health harms into consideration when making decisions about cumulative impact policies (CIPs) which can be used to manage problems linked to the density of premises in specific areas. 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. We are proposing 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. We expect that those areas with the highest levels of alcohol-related health harm, or fast rising levels of harm from alcohol, will be most likely to use this power. It 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. More information is available in the full consultation document and impact assessment. Do you want to answer questions on health as a licensing objective for cumulative impact policies? Please select one option.

Yes

Score

0

Page Score

0

## Page 9: Health as a licensing objective for cumulative impact policies

Q24. 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):

Public health host a range of data on alcohol harm across the County and should be utilised better to support CIP.

A & E data should be provided as statutory, which it currently isn't in all areas. This data can then be used to support license applications.

We would ask that this data be looked at and ensure provided and shared across a wider area than current. It also needs to be more robust and also provided by the ambulance and triage services.

Q25. 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

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

Public health is required as a licensing objective. This also links to a range of other issues such as obesity

Score

0

Q26. 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 your answer in the box below, providing evidence to support your response (keeping your views to a maximum of 200 words):

We feel that CIPs are limited in their use. They take a lot of work currently to function and deliver local outcomes.

Improved use of health data would aid this process, however data from both A & E and ambulance is currently not of sufficient quality or shared widely enough.

Pressure from central government and further legislation is required to encourage health to share their data so that it is more robust.

This could lead to the limiting of alcohol premises opening and would need to consider regeneration of an area, in particular where housing developments and risk of retailers not developing in an area if they couldn't hold a license.

Page Score

0

## Page 10: Freeing up responsible businesses

Q27. The government has committed to consult on giving licensing authorities greater freedom to take decisions that reflect the needs of their local community. Following the government's Red Tape Challenge in 2011, three areas of reform were specified: alcohol licensing for certain types of premises providing minimal alcohol sales, temporary event notices (TENs) and the licensing of late night refreshment. This section asks for views on these proposals and suggests further ways to reduce burdens on business. The proposals set out here can be seen alongside work undertaken by the Department for Culture, Media and Sport to remove unnecessary red tape from regulated entertainment. More information on each of these areas for reform is available in the full consultation document. There are five subjects covered in this section. They are: ancillary sales of alcohol, occasional provision of licensable activities at community events, an extension of the temporary event notice limit at individual premises, late night refreshment, and further proposals to reduce burdens on business. Do you want to answer questions on freeing up responsible businesses? Please select one option.

Yes

Score

0

Page Score

0

## Page 11: Freeing up responsible businesses

Q28. Ancillary sales of alcohol For many businesses, the sale of alcohol is only a small part of, or incidental to, their wider activities, and occurs alongside the provision of another product or service (which this consultation refers to as an 'ancillary sale'). For example, a guesthouse might wish to provide wine to its guests with an evening meal or a complimentary bottle of wine in a guest's room, while a hairdresser might wish to offer clients a glass of wine. 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
<b>The provision should be limited to a specific list of certain types of business and the kinds of sales they make</b>		X	
<b>The provision should be available to all businesses providing they meet certain qualification criteria to be an ancillary seller</b>		X	
<b>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 the above options</b>		X	

Score

0

Q29. If special provisions 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.

	Yes	No	Don't know
<b>Accommodation providers, providing alcohol alongside accommodation as part of the contract</b>		X	
<b>Hair and beauty salons, providing alcohol alongside a hair or beauty treatment</b>		X	
<b>Florists, providing alcohol alongside the purchase of flowers</b>	X		
<b>Cultural organisations, such as theatres, cinemas and museums, providing alcohol alongside cultural events as part of the entry ticket</b>		X	
<b>Regular charitable events, providing alcohol as part of the wider occasion</b>		X	

Score

0

Q30. 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 suggestions in the box

below, keeping your views to a maximum of 200 words:

no

widening the opportunity for access to alcohol goes against everything currently being tried to be achieved and does not demonstrate a responsible approach to alcohol.

Q31. 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. Alternatively, a second option is to broaden the definition of 'ancillary sales' to include all businesses (and/or not for profit activities) through the use of a general set of qualification criteria, for example, to the effect that: alcohol must be sold or supplied as a small part or proportion of a sales transaction or contract for a wider service, and the amount of alcohol that could be supplied as part of that contract cannot exceed a prescribed amount. Do you think that the qualification criteria proposed meet this aim?

No

***Please use the space below to provide further comments (keeping your views to a maximum of 200 words):***

If alcohol is such a problem, why create a greater opportunity and increased risk to exploit the loopholes.

Score

0

Q32. 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
<b>Allow premises making ancillary sales to request in their premises licence application that the requirement for a personal licence holder be removed</b>		X	
<b>Introduce a new, light-touch form of authorisation for premises making ancillary sales - an ASN but retaining the need for a personal licence holder</b>	X		
<b>Introduce a new, light touch form of authorisation for premises making ancillary sales - an ASN - with no requirement for a personal licence holder</b>		X	

Score

0

Q33. Do you think these proposals would impact adversely on one or more of the licensing objectives? Please select one option.

	Yes	No	Don't know
<b>Allow premises making ancillary sales to request in their premises licence application that the requirement for a personal licence holder be removed</b>	X		
<b>Introduce a new, light-touch form of authorisation for premises making ancillary sales - an ASN but retaining the need for a personal licence holder</b>	X		
<b>Introduce a new, light touch form of authorisation for premises making ancillary sales - an ASN - with no requirement for a personal licence holder</b>	X		

Score

0

Q34. 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 response to a maximum of 200 words:

The current povision of the DPS is not sufficient as often they are the only person that has received any training and often are not on teh premises or when they are don't engage with the sellers.

There needs to be an alternatiove provision of training - 2 tier for off sales and on sales and aimed wider than just teh license holder.

Page Score

0

## Page 12: Freeing up responsible businesses

Q35. 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.

No

Score

0

Q36. 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
<b>Reduce the burden</b>		X	
<b>Increase the burden</b>	X		

Score

0

Page Score

0

## Page 13: Freeing up responsible businesses

Q37. Should the number of TENS which can be given in respect of individual premises be increased? Please select one option.

Yes

Score

0

Q38. If you answered yes, please select one option to indicate which you would prefer. Please select one option.

18

Score

0

Page Score

0

## Page 14: Freeing up responsible businesses

Q39. 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
<b>Determining that premises in certain areas are exempt</b>		X	
<b>Determining that certain premises types are exempt in their local area</b>		X	

Score

0

Q40. 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

Score

0

Q41. 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).

**No Response**

Page Score

0

## Page 15: Freeing up responsible businesses

Q42. Do you agree with each of the following proposals? Please select one option in each row.

	Yes	No	Don't know
<b>Remove requirements to advertise licensing applications in local newspapers</b>		X	
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs for the on and off-trade</b>	X		
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs, but only in respect of overnight accommodation - lodges</b>	X		
<b>Remove or simplify requirements to renew personal licences under the 2003 Act</b>		X	

Score

0

Q43. 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
<b>Remove requirements to advertise licensing applications in local newspapers</b>	X		
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs for the on and off-trade</b>	X		
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs, but only in respect of overnight accommodation - lodges</b>	X		
<b>Remove or simplify requirements to renew personal licences under the 2003 Act</b>		X	

Score

0

Q44. 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.

	Yes	No	Don't know
<b>Remove requirements to advertise licensing applications in local newspapers</b>	X		
<b>Remove the centrally imposed prohibition on the</b>		X	

<b>sale of alcohol at MSAs for the on and off-trade</b>			
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs, but only in respect of overnight accommodation - lodges</b>		X	
<b>Remove or simplify requirements to renew personal licences under the 2003 Act</b>	X		

Score

0

Q45. 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 keep your views to a maximum of 200 words.)

If we want to address the concerns around alcohol, both from a public order point of view and a long term health issue then we need to change peoples attitudes and the culture towards drinking.

A step towards doing this would be to reduce alcohol in the presence of young people. Alcohol is currently served and available at childrens only entertainment venues - this could be addressed and premises used for the purpose of entertaining children not allowed a license.

In addition alcohol advertising is still visible at cinemas when attending films rated below 18. This could also be stopped

Page Score

0

## Page 16: Impact assessments

Q46. Impact assessments for the proposals in this consultation have been published alongside the full consultation document. 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
<b>Minimum unit pricing</b>		X	
<b>Multi-buy promotions</b>		X	
<b>Health as a licensing objective for cumulative impact</b>		X	
<b>Ancillary sales of alcohol</b>		X	

<b>Temporary event notices</b>		X	
<b>Late night refreshment</b>		X	
<b>Removing the duty to advertise licence applications in a local newspaper</b>		X	
<b>Sales of alcohol at motorway service stations</b>		X	
<b>Personal licences</b>		X	

Score

0

Q47. Do you have any comments on the methodologies or assumptions used in the impact assessments? If yes, please specify in the box below, clearly referencing the impact assessment and page to which you refer (keeping your views to a maximum of 400 words).

*No Response*

Page Score

0

## Scoring Summary

<b>Pages</b>	<b>Total</b>
1. About you	0
2. A minimum unit price for alcohol	0
3. A minimum unit price for alcohol	0
4. A ban on multi-buy promotions in the off-trade	0
5. A ban on multi-buy promotions in the off-trade	0
6. Reviewing the mandatory licensing conditions	0
7. Reviewing the mandatory licensing conditions	0
8. Health as a licensing objective for cumulative impact policies	0
9. Health as a licensing objective for cumulative impact policies	0

10. Freeing up responsible businesses	0
11. Freeing up responsible businesses	0
12. Freeing up responsible businesses	0
13. Freeing up responsible businesses	0
14. Freeing up responsible businesses	0
15. Freeing up responsible businesses	0
16. Impact assessments	0
<b>Total Survey Score:</b>	<b>0</b>

# Alcohol strategy consultation

User Details - 5457018

**Date Started:** 04/02/2013 16:31:27      **Date Ended:** 04/02/2013 16:35:37

**Time taken:** 4 mins, 10 secs      **IP Address:** n/a

**Unique ID:** n/a

## Page 1: About you

Q1. Please select if you would like your response or personal details to be treated as confidential.

*No Response*

Score

0

Q2. Which of the following best describes you or the professional interest you represent? Please select one option from the menu below.

Other

***Please specify which organisation, licensing authority or police force you represent in the box below:***

Tees, Esk and Wear Valleys NHS Foundation Trust Large Mental Health Trust from the North of England

Score

0

Q3. If you are responding on behalf of an organisation or interest group, please write in the box below the number of members in your group or organisation.

*No Response*

Q4. How did you obtain the views of your members? Please explain in the box below keeping your response to a maximum of 100 words.

*No Response*

Q5. Please indicate in which region you or your organisation is based. Please select one option from the menu below.

North East England

Score

0

Q6. If you are responding as a member of the public, what is your gender? Please select one option.

*No Response*

Score

0

Q7. If you are responding as a member of the public, what is your age?

Please select one option.

*No Response*

Score

0

Page Score

0

## Page 2: A minimum unit price for alcohol

Q8. In the alcohol strategy, the government committed to introducing a minimum unit price for alcohol in England and Wales. This consultation will contribute to the debate on the most appropriate price per unit and the mechanism by which, once set, minimum unit pricing would remain effective. It is also an opportunity for interested parties to raise other issues around minimum unit pricing. The purpose of minimum unit pricing is to reduce alcohol consumption, particularly by the most hazardous and harmful drinkers who tend to show a preference for the cheapest alcohol products. By doing so the government estimates there will be a reduction in the associated crime and health harms, especially the numbers of hospital admissions, alcohol-related deaths and alcohol-related crimes. Minimum unit pricing is not intended disproportionately to affect responsible drinkers or particular social groups but to reduce the availability of alcohol sold at very low or heavily discounted prices. More information (including the definitions of hazardous and harmful drinkers) is available in the full consultation document and the impact assessment. Do you want to answer questions on minimum unit pricing? Please select one option.

Yes

Score

0

Page Score

0

## Page 3: A minimum unit price for alcohol

Q9. The impact of minimum unit pricing will depend on the price per unit of alcohol. The government wants to ensure that the chosen price level is targeted and proportionate, whilst achieving a significant reduction of harm. The government is therefore consulting on the introduction of a recommended minimum unit price of 45p. The government estimates a reduction in consumption across all product types of 3.3 per cent, a reduction in crime of 5,240 per year, a reduction in 24,600 alcohol-related hospital admissions and 714 fewer deaths per year after ten years. Do you agree that this minimum unit price level would achieve these aims? Please select one option.

Yes

Score

0

Q10. Should other factors or evidence be considered when setting a minimum unit price for alcohol? Please select one option.

No

Score

0

Q11. The government wishes to maintain the effectiveness of minimum unit pricing and is therefore proposing to adjust the minimum unit price level over time. 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 automatically be updated in line with inflation each year

Score

0

Q12. 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.

No

Score

0

Page Score

0

## Page 4: A ban on multi-buy promotions in the off-trade

Q13. The government is consulting on introducing a ban on multi-buy promotions in the off-trade (e.g. shops and off-licences) as part of its wider strategy to reduce excessive alcohol consumption, and alongside the introduction of a minimum unit price. A ban on multi-buy promotions would therefore not apply to pubs, clubs, bars or restaurants. The term 'multi-buy promotions' refers to alcohol promotions that offer a discount for buying multiple items. 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. As well as being part of a wider strategy to reduce consumption and tackle irresponsible alcohol sales, a ban on multi-buy promotions would also contribute to the government's aim of encouraging people to be aware of how much they drink and the risks of excessive drinking, so that they can make informed choices. The aim of this consultation is to assess support for such a ban and contribute to our understanding of the impact a ban on multi-buy promotions may have. The types of promotion it is proposed that a ban would include, are: two for the price of one, three for the price of two, buy one get one free, buy six and get 20 per cent off, 24 cans of lager costing less than 24 times the cost of a single 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, 3 for £10 where each bottle costs more than £3.33. More information is available in the full consultation

document and the impact assessment. Do you want to answer questions on a ban on multi-buy promotions in the off-trade? Please select one option.

Yes

Score

0

Page Score

0

## **Page 5: A ban on multi-buy promotions in the off-trade**

Q14. Do you think there should be a ban on multi-buy promotions involving alcohol in the off-trade? Please select one option.

Yes

Score

0

Q15. Are there any further offers which should be included in a ban on multi-buy promotions? Please select one option.

Don't know

Score

0

Q16. Should other factors or evidence be taken into account when considering a ban on multi-buy promotions? Please select one option.

No

Score

0

Q17. 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.

No

Score

0

Page Score

0

## **Page 6: Reviewing the mandatory licensing conditions**

Q18. 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 alcohol 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. The government has also committed to consult on whether these mandatory licensing conditions should, where relevant, apply to both the on- and off-trade. This consultation forms part of that review, and will contribute to the government's understanding of how these mandatory conditions are

perceived. The five mandatory licensing conditions currently set out in regulations in relation to the supply of alcohol are: a ban on irresponsible promotions a ban on dispensing alcohol by one person directly into the mouth of another a requirement to provide free tap water on request to customers a requirement to have an age verification policy to prevent the sale of alcohol to persons under 18 years of age, and a requirement to make available to customers small measures such as half pints or beer or cider or 125ml glasses of wine More information is available in the full consultation document. An explanation of each of these terms can be found on page 20 of the consultation document, in the glossary at the end. Do you want to answer questions on reviewing the mandatory licensing conditions? Please select one option.

No

Score

0

Page Score

0

## Page 7: Reviewing the mandatory licensing conditions

Q19. Do you think each of the mandatory licensing conditions is effective in promoting the licensing objectives? For more information on the licensing objectives please see the glossary at the end of the full consultation document. Please select one option (Yes, No, Don't know) from each drop down menu.

*No Response*

Score

0

Q20. Do you think that the mandatory licensing conditions do enough to target irresponsible promotions in pubs and clubs? Please select one option.

*No Response*

Score

0

Q21. Are there other issues related to the licensing objectives which could be tackled through a mandatory licensing condition? Please select one option.

*No Response*

Score

0

Q22. Do you think that 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.

*No Response*

Score

0

Page Score

0

## Page 8: Health as a licensing objective for cumulative impact policies

Q23. We want to ensure that licensing authorities are able to take alcohol-related health harms into consideration when making decisions about cumulative impact policies (CIPs) which can be used to manage problems linked to the density of premises in specific areas. 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. We are proposing 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. We expect that those areas with the highest levels of alcohol-related health harm, or fast rising levels of harm from alcohol, will be most likely to use this power. It 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. More information is available in the full consultation document and impact assessment. Do you want to answer questions on health as a licensing objective for cumulative impact policies? Please select one option.

No

Score

0

Page Score

0

## Page 9: Health as a licensing objective for cumulative impact policies

Q24. 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):

*No Response*

Q25. 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.

*No Response*

Score

0

Q26. 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 your answer in the box below, providing evidence to support your response (keeping your views to a maximum of 200 words):

*No Response*

Page Score

0

## Page 10: Freeing up responsible businesses

Q27. The government has committed to consult on giving licensing authorities greater freedom to take decisions that reflect the needs of their local community. Following the government's Red Tape Challenge in 2011, three areas of reform were specified: alcohol licensing for certain types of premises providing minimal alcohol sales, temporary event notices (TENs) and the licensing of late night refreshment. This section asks for views on these proposals and suggests further ways to reduce burdens on business. The proposals set out here can be seen alongside work undertaken by the Department for Culture, Media and Sport to remove unnecessary red tape from regulated entertainment. More information on each of these areas for reform is available in the full consultation document. There are five subjects covered in this section. They are: ancillary sales of alcohol occasional provision of licensable activities at community events an extension of the temporary event notice limit at individual premises late night refreshment, and further proposals to reduce burdens on business Do you want to answer questions on freeing up responsible businesses? Please select one option.

No

Score

0

Page Score

0

## Page 11: Freeing up responsible businesses

Q28. Ancillary sales of alcohol For many businesses, the sale of alcohol is only a small part of, or incidental to, their wider activities, and occurs alongside the provision of another product or service (which this consultation refers to as an 'ancillary sale'). For example, a guesthouse might wish to provide wine to its guests with an evening meal or a complimentary bottle of wine in a guest's room, while a hairdresser might wish to offer clients a glass of wine. 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.

*No Response*

Score

0

Q29. If special provisions 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.

*No Response*

Score

0

Q30. 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 suggestions in the box below, keeping your views to a maximum of 200 words:

*No Response*

Q31. 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. Alternatively, a second option is to broaden the definition of 'ancillary sales' to include all businesses (and/or not for profit activities) through the use of a general set of qualification criteria, for example, to the effect that: alcohol must be sold or supplied as a small part or proportion of a sales transaction or contract for a wider service, and the amount of alcohol that could be supplied as part of that contract cannot exceed a prescribed amount. Do you think that the qualification criteria proposed meet this aim?

*No Response*

Score

0

Q32. Do you think that these proposals would significantly reduce the burdens on ancillary sellers? Please select one option in each row.

*No Response*

Score

0

Q33. Do you think these proposals would impact adversely on one or more of the licensing objectives? Please select one option.

*No Response*

Score

0

Q34. 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 response to a maximum of 200 words:

*No Response*

Page Score

0

## **Page 12: Freeing up responsible businesses**

Q35. 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.

*No Response*

Score

0

Q36. What impact do you think a locally determined notification would have on organisers of community events? Please select one option in each row.

*No Response*

Score

0

Page Score

0

## **Page 13: Freeing up responsible businesses**

Q37. Should the number of TENs which can be given in respect of individual premises be increased? Please select one option.

*No Response*

Score

0

Q38. If you answered yes, please select one option to indicate which you would prefer. Please select one option.

*No Response*

Score

0

Page Score

0

## **Page 14: Freeing up responsible businesses**

Q39. 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.

*No Response*

Score

0

Q40. 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.

*No Response*

Score

0

Q41. 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).

*No Response*

Page Score

0

## **Page 15: Freeing up responsible businesses**

Q42. Do you agree with each of the following proposals? Please select one option in each row.

*No Response*

Score

0

Q43. Do you think that each of the following would reduce the overall burdens on business? Please select one option in each row.

*No Response*

Score

0

Q44. 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.

*No Response*

Score

0

Q45. 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 keep your views to a maximum of 200 words.)

*No Response*

Page Score

0

## Page 16: Impact assessments

Q46. Impact assessments for the proposals in this consultation have been published alongside the full consultation document. 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
Minimum unit pricing	X		
Multi-buy promotions	X		
Health as a licensing objective for cumulative impact	X		
Ancillary sales of alcohol	X		
Temporary event notices	X		
Late night refreshment	X		
Removing the duty to advertise licence applications in a local newspaper	X		

<b>Sales of alcohol at motorway service stations</b>	X		
<b>Personal licences</b>	X		

Score

0

Q47. Do you have any comments on the methodologies or assumptions used in the impact assessments? If yes, please specify in the box below, clearly referencing the impact assessment and page to which you refer (keeping your views to a maximum of 400 words).

*No Response*

Page Score

0

## Scoring Summary

Pages	Total
1. About you	0
2. A minimum unit price for alcohol	0
3. A minimum unit price for alcohol	0
4. A ban on multi-buy promotions in the off-trade	0
5. A ban on multi-buy promotions in the off-trade	0
6. Reviewing the mandatory licensing conditions	0
7. Reviewing the mandatory licensing conditions	0
8. Health as a licensing objective for cumulative impact policies	0
9. Health as a licensing objective for cumulative impact policies	0
10. Freeing up responsible businesses	0
11. Freeing up responsible businesses	0
12. Freeing up responsible businesses	0
13. Freeing up responsible businesses	0

14. Freeing up responsible businesses	0
15. Freeing up responsible businesses	0
16. Impact assessments	0
<b>Total Survey Score:</b>	0

# Alcohol strategy consultation

User Details - 5452802

**Date Started:** 04/02/2013 09:54:33 **Date Ended:** 04/02/2013 16:52:42

**Time taken:** 6 hrs, 58 mins, 9 secs **IP Address:** n/a

**Unique ID:** n/a

## Page 1: About you

Q1. Please select if you would like your response or personal details to be treated as confidential.

**No Response**

Score

0

Q2. Which of the following best describes you or the professional interest you represent? Please select one option from the menu below.

Local government (other)

***Please specify which organisation, licensing authority or police force you represent in the box below:***

Liverpool City Council Alcohol and Tobacco Unit Municipal Building Dale Street Liverpool

Score

0

Q3. If you are responding on behalf of an organisation or interest group, please write in the box below the number of members in your group or organisation.

**No Response**

Q4. How did you obtain the views of your members? Please explain in the box below keeping your response to a maximum of 100 words.

**No Response**

Q5. Please indicate in which region you or your organisation is based. Please select one option from the menu below.

North West England

Score

0

Q6. If you are responding as a member of the public, what is your gender? Please select one option.

**No Response**

Score

0

Q7. If you are responding as a member of the public, what is your age?

Please select one option.

**No Response**

Score

0

Page Score

0

## Page 2: A minimum unit price for alcohol

Q8. In the alcohol strategy, the government committed to introducing a minimum unit price for alcohol in England and Wales. This consultation will contribute to the debate on the most appropriate price per unit and the mechanism by which, once set, minimum unit pricing would remain effective. It is also an opportunity for interested parties to raise other issues around minimum unit pricing. The purpose of minimum unit pricing is to reduce alcohol consumption, particularly by the most hazardous and harmful drinkers who tend to show a preference for the cheapest alcohol products. By doing so the government estimates there will be a reduction in the associated crime and health harms, especially the numbers of hospital admissions, alcohol-related deaths and alcohol-related crimes. Minimum unit pricing is not intended disproportionately to affect responsible drinkers or particular social groups but to reduce the availability of alcohol sold at very low or heavily discounted prices. More information (including the definitions of hazardous and harmful drinkers) is available in the full consultation document and the impact assessment. Do you want to answer questions on minimum unit pricing? Please select one option.

Yes

Score

0

Page Score

0

## Page 3: A minimum unit price for alcohol

Q9. The impact of minimum unit pricing will depend on the price per unit of alcohol. The government wants to ensure that the chosen price level is targeted and proportionate, whilst achieving a significant reduction of harm. The government is therefore consulting on the introduction of a recommended minimum unit price of 45p. The government estimates a reduction in consumption across all product types of 3.3 per cent, a reduction in crime of 5,240 per year, a reduction in 24,600 alcohol-related hospital admissions and 714 fewer deaths per year after ten years. Do you agree that this minimum unit price level would achieve these aims? Please select one option.

Yes

***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):***

Evidence strongly suggests setting the minimum unit price level at 50p (at

2009 prices. It should be noted that due to inflation since the ScHARR (University of Sheffield) model in 2009 (1), this figure is now equivalent to 54p). This would achieve far better outcomes than the proposed 45p price level. The ScHARR model - the only UK independently peer reviewed evidence base for minimum unit pricing, found that, after 10 years a 50p price level would save: o 3,060 lives, 1,020 more than 45p level; o 97,700 hospital admissions, 31,500 more than 45p level; o 442,300 days absent from work, 176,000 more than 45p level; o 42,500 crimes, 18,400 more than 45p price level. These are significant savings of lives, benefits for society and the economy and only cost the moderate drinker 6p per week more than a 45p minimum price level. It should also be noted that all 24 Directors of Public Health across the North West of England support a minimum unit price of at least 50p (2). There exist stringent controls in relation to the sale and packaging of tobacco products. Underpinning the governments approach to Tobacco is a duty regime to make the use of tobacco cost prohibitive. Yet since 2009 the Alcohol and Tobacco Unit of Liverpool City Council have seized non compliant illegal tobacco products on 132 separate occasions. This demonstrates that there will be a significant sector of the market who will take the opportunity to sell illegal tobacco at below the duty paid rate. It is clear that there will be a significant unscrupulous sector of the market who will exploit any attempts at price control. There is an element of the independent (and all of the illegal trade) who will see any attempt at price control as an opportunity to sell product illegally outside of the price control. It is key to meaningful control that recourses are made available or prioritised to ensure that any legislation is robustly enforced. Analysis of tobacco seizure figures shows that the majority of the illegal market is in areas where there already exist significant health inequalities. Without robust enforcement people living in those areas will not benefit from proposed controls.

Score

0

Q10. Should other factors or evidence be considered when setting a minimum unit price for alcohol? Please select one option.

Yes

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

There exist stringent controls in relation to the sale and packaging of tobacco products. Underpinning the governments approach to Tobacco is a duty regime to make the use of tobacco cost prohibitive. Yet since 2009 the Alcohol and Tobacco Unit of Liverpool City Council have seized non compliant illegal tobacco products on 132 separate occasions. This demonstrates that there will be a significant sector of the market who will take the opportunity to sell illegal tobacco at below the duty paid rate. It is clear that there will be a significant unscrupulous sector of the market who will exploit any attempts at price control. There is an element of the independent (and all of the illegal trade) who will see any attempt at price

control as an opportunity to sell product illegally outside of the price control. It is key to meaningful control that recourses are made available or prioritised to ensure that any legislation is robustly enforced. Analysis of tobacco seizure figures shows that the majority of the illegal market is in areas where there already exist significant health inequalities. Without robust enforcement people living in those areas will not benefit from proposed controls.

- o Pubs, bars and other on-trade premises will greatly benefit from a minimum price as it would reduce the differential in prices retailed in the off-trade and on-trade. Evidence suggests that this would result in a shift of drinking patterns to on-trade premises which is a safer, regulated environment to consume alcohol and positive for community pubs. This is important as CAMRA (3) reports that 16 pubs are closing every week.
- o Inflation since the SchARR model was published in 2009 means that 50p is now valued at 54p. Minimum unit pricing's success should be measured against revised levels when this policy is implemented.
- o The Scottish Government is proposing a minimum unit price of 50p creating a potentially serious cross border issues if the price level is 45p. This may encourage people to visit England to purchase and consume alcohol.
- o The price level should be regularly revised to ensure that alcohol doesn't become more affordable.
- o Additional money earned by retailers should be recouped by the Treasury and directed to local services which reduce alcohol harm.
- o Evidence from Canada shows minimum pricing works - a 10% increase in minimum prices brought an 8.43% fall in consumption (4).

Score

0

Q11. The government wishes to maintain the effectiveness of minimum unit pricing and is therefore proposing to adjust the minimum unit price level over time. 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 automatically be updated in line with inflation each year

Score

0

Q12. 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

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

'White Collar' drinkers are a growing consumption group and they will naturally consume less.

- o Children and young people would be better protected from alcohol harms by reducing access to pocket-money priced alcohol.
- o Alcohol would be de-normalised for children, to whom alcohol has

become an everyday commodity. o Drinkers and non-drinkers would benefit. Alcohol harm costs the North West more than £3billion/year (5). o 43% of people in the North West are afraid to enter town centres at night (6) – reduction in harm would reduce crime and the fear of crime. o Frontline workers would benefit from less drunken violence (7). o There would be a positive effect on offenders - 63% of male offenders are problem drinkers (8).

Score

0

Page Score

0

## **Page 4: A ban on multi-buy promotions in the off-trade**

Q13. The government is consulting on introducing a ban on multi-buy promotions in the off-trade (e.g. shops and off-licences) as part of its wider strategy to reduce excessive alcohol consumption, and alongside the introduction of a minimum unit price. A ban on multi-buy promotions would therefore not apply to pubs, clubs, bars or restaurants. The term 'multi-buy promotions' refers to alcohol promotions that offer a discount for buying multiple items. 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. As well as being part of a wider strategy to reduce consumption and tackle irresponsible alcohol sales, a ban on multi-buy promotions would also contribute to the government's aim of encouraging people to be aware of how much they drink and the risks of excessive drinking, so that they can make informed choices. The aim of this consultation is to assess support for such a ban and contribute to our understanding of the impact a ban on multi-buy promotions may have. The types of promotion it is proposed that a ban would include, are: two for the price of one, three for the price of two, buy one get one free, buy six and get 20 per cent off, 24 cans of lager costing less than 24 times the cost of a single 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, 3 for £10 where each bottle costs more than £3.33. More information is available in the full consultation document and the impact assessment. Do you want to answer questions on a ban on multi-buy promotions in the off-trade? Please select one option.

Yes

Score

0

Page Score

0

## **Page 5: A ban on multi-buy promotions in the off-trade**

Q14. Do you think there should be a ban on multi-buy promotions involving alcohol in the off-trade? Please select one option.

Yes

Score

0

Q15. Are there any further offers which should be included in a ban on multi-buy promotions? Please select one option.

Yes

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

As a rule alcohol should be treated as a special case and only ever priced money for moneysworth. o As a general principle, the purchase of any goods should not be linked to the purchase of alcohol at a lower than normal sale price. o Buying goods and getting alcohol discounted or free which would fall below a minimum unit price of 50p. o Multi-buy promotions in on-trade premises should end to be consistent with the off-trade. o There should be consistency of price per volume of a product regardless of the size or quantity of packaging that alcohol is sold in. o Loyalty point schemes and money off coupons which are in anyway linked to alcohol.

Score

0

Q16. Should other factors or evidence be taken into account when considering a ban on multi-buy promotions? Please select one option.

Yes

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

o There is a far greater impact of the multi-buy ban policy when enforced alongside a minimum unit price of 50p (at 2009 prices) (1). o Marketing of alcohol should be legislated for ensuring that it does not circumvent the spirit and intention of this legislation. o An Alcohol Concern and Balance report of 16-24 year olds (9) found that promotions encouraged more drinking. A multi-buy ban would protect more children and young people. o Multi-buy promotions encourage people to buy more alcohol than they intend resulting in easier access to alcohol in the home environment. We already know that children access alcohol from the home more than any other place (10), so a ban would reduce the access to alcohol for children. o Trading Standards needs a strengthened operation to monitor and enforce a multi-buy ban effectively as it is unlikely that relying on consumers policing the ban will be effective enough. o In a report to Parliament (11), alcohol was named as the most dangerous drug in the UK. Unlike illegal drugs, it is easily accessible and costs as little as 12p/unit (12). o Reduced consumption would improve health inequalities as lower income groups suffer greater health harms (13). Again, enforcement. There exist stringent controls in relation to the sale and packaging of tobacco products.

Underpinning the governments approach to Tobacco is a duty regime to make the use of tobacco cost prohibitive. Yet since 2009 the Alcohol and

Tobacco Unit of Liverpool City Council have seized non compliant illegal tobacco products on 132 separate occasions. This demonstrates that there will be a significant sector of the market who will take the opportunity to sell illegal tobacco at below the duty paid rate. It is clear that there will be a significant unscrupulous sector of the market who will exploit any attempts at price control. There is an element of the independent (and all of the illegal trade) who will see any attempt at price control as an opportunity to sell product illegally outside of the price control. It is key to meaningful control that recourses are made available or prioritised to ensure that any legislation is robustly enforced. Analysis of tobacco seizure figures shows that the majority of the illegal market is in areas where there already exist significant health inequalities. Without robust enforcement people living in those areas will not benefit from proposed controls.

Score

0

Q17. 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

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

There should be a consistency in approach, therefore we would not want to differentiate between groups, however: o Pubs could benefit as people are less likely to preload on alcohol bought from off-licence premises and shift their consumption of alcohol to on-licence premises. o Young people will benefit from reduced access and availability of alcohol in the home environment. o Some of these measures may only be effective alongside minimum unit pricing. o Public services, such as the NHS, would benefit, as less people would binge drink and pre-load and result in a lower burden on services (14).

Score

0

Page Score

0

## **Page 6: Reviewing the mandatory licensing conditions**

Q18. 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 alcohol 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. The government has also committed to consult on whether these mandatory licensing conditions should, where relevant, apply to both the on-

and off-trade. This consultation forms part of that review, and will contribute to the government's understanding of how these mandatory conditions are perceived. The five mandatory licensing conditions currently set out in regulations in relation to the supply of alcohol are: a ban on irresponsible promotions a ban on dispensing alcohol by one person directly into the mouth of another a requirement to provide free tap water on request to customers a requirement to have an age verification policy to prevent the sale of alcohol to persons under 18 years of age, and a requirement to make available to customers small measures such as half pints or beer or cider or 125ml glasses of wine More information is available in the full consultation document. An explanation of each of these terms can be found on page 20 of the consultation document, in the glossary at the end. Do you want to answer questions on reviewing the mandatory licensing conditions? Please select one option.

Yes

Score

0

Page Score

0

## Page 7: Reviewing the mandatory licensing conditions

Q19. Do you think each of the mandatory licensing conditions is effective in promoting the licensing objectives? For more information on the licensing objectives please see the glossary at the end of the full consultation document. Please select one option (Yes, No, Don't know) from each drop down menu.

	Prevention of crime and disorder	Public safety	Prevention of public nuisance	Protection of children from harm
<b>Irresponsible promotions</b>	Yes	Yes	Yes	Yes
<b>Dispensing alcohol directly into the mouth</b>	Yes	Yes	Yes	Yes
<b>Mandatory provision of free tap water</b>	Yes	Yes	Yes	Yes
<b>Age verification policy</b>	Yes	Yes	Yes	Yes
<b>Mandatory</b>	Yes	Yes	Yes	Yes

<b>provision of small measures</b>				
------------------------------------	--	--	--	--

Score

0

Q20. Do you think that the mandatory licensing conditions do enough to target irresponsible promotions in pubs and clubs? Please select one option.

No

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

All Pricing to be on basis of money for moneysworth within M.U.P. Option for an increased localised MUP as part of CIP in Night Time Economy. o Remove the 'glamourisation' test for promotions and ban all irresponsible promotions. o Remove the 'need to demonstrate a link with crime and disorder' clause relating to irresponsible promotions as it is too restrictive. o The unit content of all drinks should be clearly visible at the point of sale so customers know what they are drinking. o Age verification schemes should be a compulsory challenge 21, have a written policy and include mandatory signage on premises. With id check requirement for all bars after 12 midnight. o Licensees should train and re-train their staff to be accredited to a national standard for the safe and responsible retailing of alcohol.

Score

0

Q21. Are there other issues related to the licensing objectives which could be tackled through a mandatory licensing condition? Please select one option.

Yes

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

Compulsory minimum 50/50 split for seating and standing customers for bars after midnight. Specialist 'dance' clubs to apply for exempt license. Any agency or promotion supplies of alcohol to be banned. All sales by employees either at bar or to seated customers by waiting staff. o A proportionate seating and standing ratio should be dictated by the capacity of the premises. o Soft drinks should be priced cheaper than the cheapest alcoholic drink to remove the incentive for people to drink alcoholic drinks. o Beer should be decanted from bottles at the bar. The removal of beer bottles from the drinking environment will provide a safer drinking environment. o A ban on irresponsible drinks promotions should be applied to the off-trade. o Loyalty point schemes for the purchase of alcohol which encourages increased consumption should be banned. o Offering shots of spirits away from the bar area (e.g. table to table selling of shots of pre-poured vodka) should be banned. o Happy hours should be banned as they sell discounted alcohol. o Organised commercial pub crawls should be banned as they encourage the consumption of excess alcohol in a short

space of time which leads to drunkenness and anti-social behaviour (15). o Ladies nights, (where there are discounted or free drinks) should be banned as they encourage excessive consumption of alcohol. o Drinking games should be banned.

Score

0

Q22. Do you think that 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.

No

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

There should be as many or as few mandatory licensing conditions as deemed appropriate by the Government. This should include extending the ban on irresponsible drinks promotions to cover off-trade licensed premises to create a consistency across the on- and off-trades. Supermarket alcohol sales now account for 70% of off-trade sales (16, 17) and can sell alcohol at discounted prices. Stopping irresponsible promotions would also help to tackle pre-loading and binge drinking of alcohol purchased from the off-trade. People who have pre-loaded are more likely to be a victim or perpetrator of crime (17). Again, supermarkets in particular should be subject to money for moneyworth provisions of sale of alcohol, within M.U.P. provisions.

Score

0

Page Score

0

## **Page 8: Health as a licensing objective for cumulative impact policies**

Q23. We want to ensure that licensing authorities are able to take alcohol-related health harms into consideration when making decisions about cumulative impact policies (CIPs) which can be used to manage problems linked to the density of premises in specific areas. 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. We are proposing 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. We expect that those areas with the highest levels of alcohol-related health harm, or fast rising levels of harm from alcohol, will be most likely to use this power. It 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. More information is available in the full consultation document and impact assessment. Do you want to answer questions on health as a licensing objective for cumulative impact policies? Please select one option.

Yes

Score

0

Page Score

0

## Page 9: Health as a licensing objective for cumulative impact policies

Q24. 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):

Consideration of figures for the Crime and disorder caused by and suffered by problem drinkers.

The impact on children of problem drinkers eg re school attendance.

A robust Joint Strategic Needs Assessment would provide consistency in approach, we recommend that it would include:

- o Accident and Emergency data
- o Ambulance data
- o Paramedic data
- o GP data
- o Urgent care/walk in centre data
- o Treatment data including specialist treatment
- o Demand/unmet demand for alcohol treatment
- o Alcohol related mortality (including suicides and self harm)
- o Mental health and wellbeing indices
- o Foetal Alcohol Spectrum Disorders data
- o CEM Home Office monitoring data on violence
- o Trauma and Injury Intelligence Group data from the North West Public Health Observatory

A robust Joint Strategic Needs Assessment would provide consistency in approach, we recommend that it would include:

- o Accident and Emergency data
- o Ambulance data
- o Paramedic data
- o GP data
- o Urgent care/walk in centre data
- o Treatment data including specialist treatment
- o Demand/unmet demand for alcohol treatment
- o Alcohol related mortality (including suicides and self harm)

- o Mental health and wellbeing indices
- o Foetal Alcohol Spectrum Disorders data
- o CEM Home Office monitoring data on violence
- o Trauma and Injury Intelligence Group data from the North West Public Health Observatory

Q25. 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

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

Currently only data that supports the current licensing objectives can be used when objecting to licence applications which are within a Cumulative Impact Policies (CIP). We believe that all responsible authorities and their evidence should be able to be used to object to an application therefore widening the process through another objective for public health, which will enable health data and the impact on health harms to be considered. For example if there is a health harm issue but no crime issue, health bodies may object on the grounds of a CIP. As noted in question 13, public health and assessment of over-provision of alcohol should be considered across the authority area as consideration at ward level could be insufficient and not take into account sales from neighbouring wards.

Score

0

Q26. 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 your answer in the box below, providing evidence to support your response (keeping your views to a maximum of 200 words):

Consideration of figures for the Crime and disorder caused by and suffered by problem drinkers.

The impact on children of problem drinkers eg re school attendance.

- o In addition to the impact on controlling alcohol related crime the health data can impact upon all policy areas and licensing objectives giving stronger evidence and improving the all round data picture to set a baseline and allow for more informed decision making, e.g. alcohol related assaults reporting to A&E but not to the police.
- o Including health data in consideration of a CIP would enable local links between alcohol and health harm to be better established.
- o There will be a positive impact on people's mental health and wellbeing because there is less violence, improving healthiness of the population, increased life expectancy and increased economic productivity.
- o Where there is a saturation of licensed premises, for example in a city

centre, competition drives down the price of alcohol which encourages additional consumption. An authority wide over-provision policy backed by public health would lessen 'competition by price' and so limit availability of alcohol to young people, which is an indicator of harm (18).

o The World Health Organisation (19) has reported that availability effects levels of harm therefore Licensing Authorities should be able to control the availability of alcohol.

Page Score

0

## Page 10: Freeing up responsible businesses

Q27. The government has committed to consult on giving licensing authorities greater freedom to take decisions that reflect the needs of their local community. Following the government's Red Tape Challenge in 2011, three areas of reform were specified: alcohol licensing for certain types of premises providing minimal alcohol sales, temporary event notices (TENs) and the licensing of late night refreshment. This section asks for views on these proposals and suggests further ways to reduce burdens on business. The proposals set out here can be seen alongside work undertaken by the Department for Culture, Media and Sport to remove unnecessary red tape from regulated entertainment. More information on each of these areas for reform is available in the full consultation document. There are five subjects covered in this section. They are: ancillary sales of alcohol occasional provision of licensable activities at community events an extension of the temporary event notice limit at individual premises late night refreshment, and further proposals to reduce burdens on business Do you want to answer questions on freeing up responsible businesses? Please select one option.

Yes

Score

0

Page Score

0

## Page 11: Freeing up responsible businesses

Q28. Ancillary sales of alcohol For many businesses, the sale of alcohol is only a small part of, or incidental to, their wider activities, and occurs alongside the provision of another product or service (which this consultation refers to as an 'ancillary sale'). For example, a guesthouse might wish to provide wine to its guests with an evening meal or a complimentary bottle of wine in a guest's room, while a hairdresser might wish to offer clients a glass of wine. 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
<b>The provision should be limited to a specific list of certain types of business and the kinds of sales they make</b>		X	
<b>The provision should be available to all businesses providing they meet certain qualification criteria to be an ancillary seller</b>		X	
<b>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 the above options</b>			

Score

0

Q29. If special provisions 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.

	Yes	No	Don't know
<b>Accommodation providers, providing alcohol alongside accommodation as part of the contract</b>		X	
<b>Hair and beauty salons, providing alcohol alongside a hair or beauty treatment</b>		X	
<b>Florists, providing alcohol alongside the purchase of flowers</b>		X	
<b>Cultural organisations, such as theatres, cinemas and museums, providing alcohol alongside cultural events as part of the entry ticket</b>		X	
<b>Regular charitable events, providing alcohol as part of the wider occasion</b>		X	

Score

0

Q30. 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 suggestions in the box below, keeping your views to a maximum of 200 words:

None, not even the ones we have above.

There exists a problem even within the current regime whereby bars submit

an operating schedule with pretence at being a chilled out jazz club and quite soon end up playing loud dance music to a dance crowd. My concern is that in area where I work this would be likely to happen in for example 'barber' shops which would in effect become bars.

Who would police this and where would the resource come from.

I would consider this the same as cigarettes, why would they need to be supplied and smoked in one of these ancillary businesses.

Alcohol should not be treated as an everyday, ordinary product (20).

- o Any sale of alcohol should be regulated. Therefore there are no types of premises for alcohol sales which should be unregulated. Unregulated alcohol sales would create a situation where the objectives of the Licensing Act 2003 would be unenforceable.

- o The licensed sale of alcohol also protects and ensures a standard of 'due diligence' is adhered to by people selling alcohol.

- o This proposal would create a third tier of licensed premises as it would create a category outside Early Morning Restriction Orders/Late Night Levy and CIPs. This would create confusion for consumers and enforcement officers and lead to increased costs for public sector organisations dealing with the harmful effects of alcohol.

- o This extra category of licensed premises could be contributing to the harm of excessive alcohol consumption but would not contribute to the costs, for example through a Late Night Levy being applied to licensed premises.

Q31. 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. Alternatively, a second option is to broaden the definition of 'ancillary sales' to include all businesses (and/or not for profit activities) through the use of a general set of qualification criteria, for example, to the effect that: alcohol must be sold or supplied as a small part or proportion of a sales transaction or contract for a wider service, and the amount of alcohol that could be supplied as part of that contract cannot exceed a prescribed amount Do you think that the qualification criteria proposed meet this aim?

No

***Please use the space below to provide further comments (keeping your views to a maximum of 200 words):***

See above. This type of relaxation would be abused by pirate independent sector of trade, particularly in area outside of city centre where there exist already health inequalities. Enforcement would be hard. o We don't agree with the 'ancillary seller' status because there is no mechanism to police these businesses, and ensure that they retail alcohol responsibly. o The

scheme would also take the sale of alcohol out of the remit of the four objectives of the Licensing Act 2003 and the proposed objective of 'Public Health' thus undermining the Licensing Act. o The 'ancillary sellers' of alcohol in the retail environment would not come under the same protection afforded by the Licensing Act or necessarily receive appropriate training therefore creating a three tier system which cannot be monitored, supported or enforced. o In addition people purchasing from an 'ancillary seller' need to understand they are purchasing from an unregulated 'ancillary seller' and are therefore not necessarily making a reputable or safe purchase, for example safeguarding underage sales.

Score

0

Q32. 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
<b>Allow premises making ancillary sales to request in their premises licence application that the requirement for a personal licence holder be removed</b>			X
<b>Introduce a new, light-touch form of authorisation for premises making ancillary sales - an ASN but retaining the need for a personal licence holder</b>			X
<b>Introduce a new, light touch form of authorisation for premises making ancillary sales - an ASN - with no requirement for a personal licence holder</b>			X

Score

0

Q33. Do you think these proposals would impact adversely on one or more of the licensing objectives? Please select one option.

	Yes	No	Don't know
<b>Allow premises making ancillary sales to request in their premises licence application that the requirement for a personal licence holder be removed</b>	X		
<b>Introduce a new, light-touch form of authorisation for premises making ancillary sales - an ASN but retaining the need for a personal licence holder</b>	X		
<b>Introduce a new, light touch form of authorisation</b>	X		

<b>for premises making ancillary sales - an ASN - with no requirement for a personal licence holder</b>			
---	--	--	--

Score

0

Q34. 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 response to a maximum of 200 words:

Do not agree with this idea.

It is a recipe for disaster and would be impossible to police.

It would be exploited by the same individuals with whom we have problems relating to tobacco. (See Q2)

There exist stringent controls in relation to the sale and packaging of tobacco products.

Underpinning the governments approach to Tobacco is a duty regime to make the use of tobacco cost prohibitive.

Yet since 2009 the Alcohol and Tobacco Unit of Liverpool City Council have seized non compliant illegal tobacco products on 132 separate occasions.

This demonstrates that there will be a significant sector of the market who will take the opportunity to sell illegal tobacco at below the duty paid rate.

It is clear that there will be a significant unscrupulous sector of the market who will exploit any attempts at price control.

There is an element of the independent (and all of the illegal trade) who will see any attempt at price control as an opportunity to sell product illegally outside of the price control.

It is key to meaningful control that recourses are made available or prioritised to ensure that any legislation is robustly enforced.

Analysis of tobacco seizure figures shows that the majority of the illegal market is in areas where there already exist significant health inequalities.

Without robust enforcement people living in those areas will not benefit from proposed controls.

We do not agree with any deregulation or unregulated sales of alcohol. The consumption of alcohol should be de-normalised in our society. This can be achieved through proper regulation which would help to reduce consumption with resulting benefits to the health and wellbeing of society.

Page Score

0

## Page 12: Freeing up responsible businesses

Q35. 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.

No

Score

0

Q36. 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
Reduce the burden			X
Increase the burden			X

Score

0

Page Score

0

## Page 13: Freeing up responsible businesses

Q37. Should the number of TENs which can be given in respect of individual premises be increased? Please select one option.

No

Score

0

Q38. If you answered yes, please select one option to indicate which you would prefer. Please select one option.

*No Response*

Score

0

Page Score

0

## Page 14: Freeing up responsible businesses

Q39. 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
Determining that premises in certain areas are exempt		X	

<b>Determining that certain premises types are exempt in their local area</b>		X	
---	--	---	--

Score

0

Q40. 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

Score

0

Q41. 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).

Accommodation - if you are serving to a guest of a patron and premises that are just serving hot food and hot drinks (non-alcoholic).

Page Score

0

## Page 15: Freeing up responsible businesses

Q42. Do you agree with each of the following proposals? Please select one option in each row.

	Yes	No	Don't know
<b>Remove requirements to advertise licensing applications in local newspapers</b>		X	
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs for the on and off-trade</b>		X	
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs, but only in respect of overnight accommodation - lodges</b>		X	
<b>Remove or simplify requirements to renew personal licences under the 2003 Act</b>		X	

Score

0

Q43. 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
<b>Remove requirements to advertise licensing applications in local newspapers</b>			X

<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs for the on and off-trade</b>			X
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs, but only in respect of overnight accommodation - lodges</b>			X
<b>Remove or simplify requirements to renew personal licences under the 2003 Act</b>			X

Score

0

Q44. 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.

	Yes	No	Don't know
<b>Remove requirements to advertise licensing applications in local newspapers</b>			X
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs for the on and off-trade</b>			X
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs, but only in respect of overnight accommodation - lodges</b>			X
<b>Remove or simplify requirements to renew personal licences under the 2003 Act</b>			X

Score

0

Q45. 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 keep your views to a maximum of 200 words.)

Dilution of control.

I see no advantages in any further relaxation of alcohol law.

There are no processes that could be removed or simplified without having an adverse effect on the licensing objectives or increasing the burden on responsible authorities or the local community.

Page Score

0

## Page 16: Impact assessments

Q46. Impact assessments for the proposals in this consultation have been

published alongside the full consultation document. 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
<b>Minimum unit pricing</b>		X	
<b>Multi-buy promotions</b>		X	
<b>Health as a licensing objective for cumulative impact</b>		X	
<b>Ancillary sales of alcohol</b>		X	
<b>Temporary event notices</b>		X	
<b>Late night refreshment</b>		X	
<b>Removing the duty to advertise licence applications in a local newspaper</b>			X
<b>Sales of alcohol at motorway service stations</b>			X
<b>Personal licences</b>			X

Score

0

Q47. Do you have any comments on the methodologies or assumptions used in the impact assessments? If yes, please specify in the box below, clearly referencing the impact assessment and page to which you refer (keeping your views to a maximum of 400 words).

Not taking into consideration that the rise in criminal activity any attempt at price control will result in.

See tobacco figures for Liverpool Alcohol and Tobacco Unit.

There exist stringent controls in relation to the sale and packaging of tobacco products.

Underpinning the governments approach to Tobacco is a duty regime to make the use of tobacco cost prohibitive.

Yet since 2009 the Alcohol and Tobacco Unit of Liverpool City Council have seized non compliant illegal tobacco products on 132 separate occasions.

This demonstrates that there will be a significant sector of the market who will take the opportunity to sell illegal tobacco at below the duty paid rate.

It is clear that there will be a significant unscrupulous sector of the market who will exploit any attempts at price control.

There is an element of the independent (and all of the illegal trade) who will see any attempt at price control as an opportunity to sell product illegally outside of the price control.

It is key to meaningful control that recourses are made available or prioritised to ensure that any legislation is robustly enforced.

Analysis of tobacco seizure figures shows that the majority of the illegal market is in areas where there already exist significant health inequalities.

Without robust enforcement people living in those areas will not benefit from proposed controls.

There is a naive approach to relaxation and a seeming failure to comprehend the way a significant majority of pirate independent businesses are likely to exploit this in our communities.

These are the type of businesses who when applying for 24 hour off licences in areas of massive unemployment, health inequality and poor school attendance will state that they are providing a service for 'shift workers.'

Page Score

0

## Scoring Summary

Pages	Total
1. About you	0
2. A minimum unit price for alcohol	0
3. A minimum unit price for alcohol	0
4. A ban on multi-buy promotions in the off-trade	0
5. A ban on multi-buy promotions in the off-trade	0
6. Reviewing the mandatory licensing conditions	0
7. Reviewing the mandatory licensing	0

conditions	
8. Health as a licensing objective for cumulative impact policies	0
9. Health as a licensing objective for cumulative impact policies	0
10. Freeing up responsible businesses	0
11. Freeing up responsible businesses	0
12. Freeing up responsible businesses	0
13. Freeing up responsible businesses	0
14. Freeing up responsible businesses	0
15. Freeing up responsible businesses	0
16. Impact assessments	0
<b>Total Survey Score:</b>	<b>0</b>

# Alcohol strategy consultation

User Details - 5403785

**Date Started:** 25/01/2013 15:54:43      **Date Ended:** 04/02/2013 17:01:17

**Time taken:** 241 hrs, 6 mins, 34 secs      **IP Address:** n/a

**Unique ID:** n/a

## Page 1: About you

Q1. Please select if you would like your response or personal details to be treated as confidential.

*No Response*

Score

0

Q2. Which of the following best describes you or the professional interest you represent? Please select one option from the menu below.

Public health body (eg Primary Care Trust, Local Health Board, Director of Public Health)

***Please specify which organisation, licensing authority or police force you represent in the box below:***

Liverpool City Council Shadow Health and Wellbeing Board

Score

0

Q3. If you are responding on behalf of an organisation or interest group, please write in the box below the number of members in your group or organisation.

*No Response*

Q4. How did you obtain the views of your members? Please explain in the box below keeping your response to a maximum of 100 words.

There has been ongoing debate and discussion between the shadow Health and Wellbeing Board members in relation to each of the consultation questions - several papers have been submitted to the Board for agreement and endorsement.

Q5. Please indicate in which region you or your organisation is based.

Please select one option from the menu below.

North West England

Score

0

Q6. If you are responding as a member of the public, what is your gender? Please select one option.

*No Response*

Score

0

Q7. If you are responding as a member of the public, what is your age?  
Please select one option.

*No Response*

Score

0

Page Score

0

## **Page 2: A minimum unit price for alcohol**

Q8. In the alcohol strategy, the government committed to introducing a minimum unit price for alcohol in England and Wales. This consultation will contribute to the debate on the most appropriate price per unit and the mechanism by which, once set, minimum unit pricing would remain effective. It is also an opportunity for interested parties to raise other issues around minimum unit pricing. The purpose of minimum unit pricing is to reduce alcohol consumption, particularly by the most hazardous and harmful drinkers who tend to show a preference for the cheapest alcohol products. By doing so the government estimates there will be a reduction in the associated crime and health harms, especially the numbers of hospital admissions, alcohol-related deaths and alcohol-related crimes. Minimum unit pricing is not intended disproportionately to affect responsible drinkers or particular social groups but to reduce the availability of alcohol sold at very low or heavily discounted prices. More information (including the definitions of hazardous and harmful drinkers) is available in the full consultation document and the impact assessment. Do you want to answer questions on minimum unit pricing? Please select one option.

Yes

Score

0

Page Score

0

## **Page 3: A minimum unit price for alcohol**

Q9. The impact of minimum unit pricing will depend on the price per unit of alcohol. The government wants to ensure that the chosen price level is targeted and proportionate, whilst achieving a significant reduction of harm. The government is therefore consulting on the introduction of a recommended minimum unit price of 45p. The government estimates a reduction in consumption across all product types of 3.3 per cent, a reduction in crime of 5,240 per year, a reduction in 24,600 alcohol-related hospital admissions and 714 fewer deaths per year after ten years. Do you agree that this minimum unit price level would achieve these aims? Please select one option.

Yes

***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):***

The Liverpool population experiences significant levels of alcohol related harm and evidence strongly suggests setting the minimum unit price level at 50p (at 2009 prices. It should be noted that due to inflation since the ScHARR (University of Sheffield) model in 2009 (1), this figure is now equivalent to 54p). This would achieve far better outcomes than the proposed 45p price level. The ScHARR model - the only UK independently peer reviewed evidence base for minimum unit pricing, predicts that, after 10 years a 50p price level would save: o 3,060 lives, 1,020 more than 45p level; o 97,700 hospital admissions, 31,500 more than 45p level; o 442,300 days absent from work, 176,000 more than 45p level; o 42,500 crimes, 18,400 more than 45p price level. These are significant savings of lives, benefits for society and the economy and only cost the moderate drinker 6p per week more than a 45p minimum price level. It should also be noted that all 24 Directors of Public Health across the North West of England support a minimum unit price of at least 50p .

Score

0

Q10. Should other factors or evidence be considered when setting a minimum unit price for alcohol? Please select one option.

Yes

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

Pubs, bars and other on-trade premises will greatly benefit from a minimum price as it would reduce the differential in prices retailed in the off-trade and on-trade. Evidence suggests that this would result in a shift of drinking patterns to on-trade premises which is a safer, regulated environment to consume alcohol and positive for community pubs. This is important as CAMRA reports that 16 pubs are closing every week. Inflation since the ScHARR model was published in 2009 means that 50p is now valued at 54p. Minimum unit pricing's success should be measured against revised levels when this policy is implemented. The Scottish Government is proposing a minimum unit price of 50p creating a potentially serious cross border issues if the price level is 45p in the North West. This may encourage people to visit England to purchase and consume alcohol. The price level should be regularly revised to ensure that alcohol doesn't become more affordable. Additional money earned by retailers should be recouped by the Treasury and directed to local services which reduce alcohol harm.

Score

0

Q11. The government wishes to maintain the effectiveness of minimum unit pricing and is therefore proposing to adjust the minimum unit price level over time. 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 automatically be updated in line with inflation each year

Score

0

Q12. 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

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

Liverpool has significantly higher rates of alcohol related hospital admissions for those aged under eighteen years, children and young people would be better protected from alcohol harms by reducing access to pocket-money priced alcohol and alcohol would be de-normalised for children, to whom alcohol has become an everyday commodity. Drinkers and non-drinkers would benefit. Alcohol harm costs the North West more than £3billion/year and the Liverpool economy more than £228 million per year, the impact that alcohol misuse has upon Liverpool reinforces that alcohol misuse is, and must remain, a priority, in order to reduce the burden on individuals and service provision. From the Liverpool City Centre Perceptions Survey in 2010, day and night time respondents indicated that 'people being drunk in the street' made them feel unsafe more than any other environmental factor and because of this, "Less drunken behaviour in public places" was perceived to be the most important factor to improve feelings of safety in 32% of responses. Frontline workers would benefit from less drunken violence. There would be a positive effect on offenders - 63% of male offenders are problem drinkers .

Score

0

Page Score

0

## **Page 4: A ban on multi-buy promotions in the off-trade**

Q13. The government is consulting on introducing a ban on multi-buy promotions in the off-trade (e.g. shops and off-licences) as part of its wider strategy to reduce excessive alcohol consumption, and alongside the introduction of a minimum unit price. A ban on multi-buy promotions would therefore not apply to pubs, clubs, bars or restaurants. The term 'multi-buy promotions' refers to alcohol promotions that offer a discount for buying multiple items. 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. As well as being part of a wider strategy to reduce consumption and tackle irresponsible alcohol sales, a ban on multi-buy promotions would also contribute to the government's aim of encouraging people to be aware of how much they drink and the risks of excessive drinking, so that they can make informed choices. The aim of this consultation is to assess support for such a ban and contribute to our understanding of the impact a ban on multi-buy promotions may have. The types of promotion it is proposed that a ban would include, are: two for the price of one, three for the price of two, buy one get one free, buy six and get 20 per cent off, 24 cans of lager costing less than 24 times the cost of a single 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, 3 for £10 where each bottle costs more than £3.33. More information is available in the full consultation document and the impact assessment. Do you want to answer questions on a ban on multi-buy promotions in the off-trade? Please select one option.

Yes

Score

0

Page Score

0

## Page 5: A ban on multi-buy promotions in the off-trade

Q14. Do you think there should be a ban on multi-buy promotions involving alcohol in the off-trade? Please select one option.

Yes

Score

0

Q15. Are there any further offers which should be included in a ban on multi-buy promotions? Please select one option.

Yes

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

As a general principle, the purchase of any goods should not be linked to the purchase of alcohol at a lower than normal sale price. Buying goods and getting alcohol discounted or free which would fall below a minimum unit price of 50p. Multi-buy promotions in on-trade premises should end to be consistent with the off-trade. There should be consistency of price per volume of a product regardless of the size or quantity of packaging that alcohol is sold in. Loyalty point schemes and money off coupons which are in anyway linked to alcohol

Score

0

Q16. Should other factors or evidence be taken into account when considering a ban on multi-buy promotions? Please select one option.

Yes

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

There is a far greater impact of the multi-buy ban policy when enforced alongside a minimum unit price of 50p (at 2009 prices). Marketing of alcohol should be legislated for ensuring that it does not circumvent the spirit and intention of this legislation. An Alcohol Concern and Balance report of 16-24 year olds found that promotions encouraged more drinking. A multi-buy ban would protect more children and young people. Multi-buy promotions encourage people to buy more alcohol than they intend resulting in easier access to alcohol in the home environment. We already know that children access alcohol from the home more than any other place , so a ban would reduce the access to alcohol for children. Trading Standards needs a strengthened operation to monitor and enforce a multi-buy ban effectively as it is unlikely that relying on consumers policing the ban will be effective enough. In a report to Parliament , alcohol was named as the most dangerous drug in the UK. Unlike illegal drugs, it is easily accessible and costs as little as 12p/unit . Reduced consumption would improve health inequalities as lower income groups suffer greater health harms .

Score

0

Q17. 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

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

There should be a consistency in approach, therefore we would not want to differentiate between groups, however: Pubs could benefit as people are less likely to preload on alcohol bought from off-licence premises and shift their consumption of alcohol to on-licence premises. Young people will benefit from reduced access and availability of alcohol in the home environment. Some of these measures may only be effective alongside minimum unit pricing. Public services, such as the NHS, would benefit, as less people would binge drink and pre-load and result in a lower burden on services .

Score

0

Page Score

0

## **Page 6: Reviewing the mandatory licensing conditions**

Q18. 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 alcohol 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. The government has also committed to consult on whether these mandatory licensing conditions should, where relevant, apply to both the on- and off-trade. This consultation forms part of that review, and will contribute to the government's understanding of how these mandatory conditions are perceived. The five mandatory licensing conditions currently set out in regulations in relation to the supply of alcohol are: a ban on irresponsible promotions a ban on dispensing alcohol by one person directly into the mouth of another a requirement to provide free tap water on request to customers a requirement to have an age verification policy to prevent the sale of alcohol to persons under 18 years of age, and a requirement to make available to customers small measures such as half pints or beer or cider or 125ml glasses of wine More information is available in the full consultation document. An explanation of each of these terms can be found on page 20 of the consultation document, in the glossary at the end. Do you want to answer questions on reviewing the mandatory licensing conditions? Please select one option.

Yes

Score

0

Page Score

0

## Page 7: Reviewing the mandatory licensing conditions

Q19. Do you think each of the mandatory licensing conditions is effective in promoting the licensing objectives? For more information on the licensing objectives please see the glossary at the end of the full consultation document. Please select one option (Yes, No, Don't know) from each drop down menu.

	Prevention of crime and disorder	Public safety	Prevention of public nuisance	Protection of children from harm
<b>Irresponsible promotions</b>	Yes	Yes	Yes	Yes
<b>Dispensing alcohol directly into the mouth</b>	Yes	Yes	Yes	Yes
<b>Mandatory provision of free tap water</b>	Yes	Yes	Yes	Yes

<b>Age verification policy</b>	Yes	Yes	Yes	Yes
<b>Mandatory provision of small measures</b>	Yes	Yes	Yes	Yes

Score

0

Q20. Do you think that the mandatory licensing conditions do enough to target irresponsible promotions in pubs and clubs? Please select one option.

No

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

Remove the 'glamourisation' test for promotions and ban all irresponsible promotions. Remove the 'need to demonstrate a link with crime and disorder' clause relating to irresponsible promotions as it is too restrictive. The unit content of all drinks should be clearly visible at the point of sale so customers know what they are drinking. Age verification schemes should be a minimum 'check 25', have a written policy and include mandatory signage on premises. Licensees should train and re-train their staff to be accredited to a national standard for the safe and responsible retailing of alcohol.

Score

0

Q21. Are there other issues related to the licensing objectives which could be tackled through a mandatory licensing condition? Please select one option.

Yes

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

A proportionate seating and standing ratio should be dictated by the capacity of the premises. Soft drinks should be priced cheaper than the cheapest alcoholic drink to remove the incentive for people to drink alcoholic drinks. Beer should be decanted from bottles at the bar. The removal of beer bottles from the drinking environment will provide a safer drinking environment. A ban on irresponsible drinks promotions should be applied to the off-trade. Loyalty point schemes for the purchase of alcohol which encourages increased consumption should be banned. Offering shots of spirits away from the bar area (e.g. table to table selling of shots of pre-poured vodka) should be banned. Happy hours should be banned as they sell discounted alcohol. Organised commercial pub crawls should be banned as they encourage the consumption of excess alcohol in a short space of time which leads to drunkenness and anti-social behaviour. Ladies nights, (where there are discounted or free drinks) should be banned as they encourage excessive consumption of alcohol. Drinking games should

be banned.

Score

0

Q22. Do you think that 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.

No

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

There should be as many or as few mandatory licensing conditions as deemed appropriate by the Government. This should include extending the ban on irresponsible drinks promotions to cover off-trade licensed premises to create a consistency across the on- and off-trades. Supermarket alcohol sales now account for 70% of off-trade sales and can sell alcohol at discounted prices. Stopping irresponsible promotions would also help to tackle pre-loading and binge drinking of alcohol purchased from the off-trade. People who have pre-loaded are more likely to be a victim or perpetrator of crime.

Score

0

Page Score

0

## **Page 8: Health as a licensing objective for cumulative impact policies**

Q23. We want to ensure that licensing authorities are able to take alcohol-related health harms into consideration when making decisions about cumulative impact policies (CIPs) which can be used to manage problems linked to the density of premises in specific areas. 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. We are proposing 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. We expect that those areas with the highest levels of alcohol-related health harm, or fast rising levels of harm from alcohol, will be most likely to use this power. It 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. More information is available in the full consultation document and impact assessment. Do you want to answer questions on health as a licensing objective for cumulative impact policies? Please select one option.

Yes

Score

0

Page Score

0

## Page 9: Health as a licensing objective for cumulative impact policies

Q24. 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):

A robust Joint Strategic Needs Assessment would provide consistency in approach, we recommend that it would include:

Accident and Emergency data

Ambulance data

Paramedic data

GP data

Urgent care/walk in centre data

Treatment data including specialist treatment

Demand/unmet demand for alcohol treatment

Alcohol related mortality (including suicides and self harm)

Mental health and wellbeing indices

Foetal Alcohol Spectrum Disorders data

CEM Home Office monitoring data on violence

Trauma and Injury Intelligence Group data from the North West Public Health Observatory

Other hospital admissions data NI39 e.g. specific (drunkenness) and non specific (cancers)

Map out premises and correlate alcohol related admissions

Domestic abuse data including child protection issues

Public health should be a licensing objective in its own right and not tied to CIPs. This would not be disproportionate as suggested in the impact assessment, and would play a role in the economic development and health of an authority area. Experience from Scotland suggests that public health should be taken into consideration across the whole authority area rather than at smaller scale when assessing the over-provision of alcohol to take into account all points of sale.

Q25. 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

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

Currently only the police can object to licence applications due to a Cumulative Impact Policies (CIP). We believe that all responsible authorities

should be able to object to the application therefore widening the process to consider health data and the impact on health harms. For example if there is a health harm issue but no crime issue, health bodies may object on the grounds of a CIP. As noted in question 13, public health and assessment of over-provision of alcohol should be considered across the authority area as consideration at ward level could be insufficient and not take into account sales from neighbouring wards.

Score

0

Q26. 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 your answer in the box below, providing evidence to support your response (keeping your views to a maximum of 200 words):

In addition to the impact on controlling alcohol related crime the health data can impact upon all policy areas and licensing objectives giving stronger evidence and improving the all round data picture to set a baseline and allow for more informed decision making, e.g. alcohol related assaults reporting to A&E but not to the police.

Including health data in consideration of a CIP would enable local links between alcohol and health harm to be better established.

There will be a positive impact on people's mental health and wellbeing because there is less violence, improving healthiness of the population, increased life expectancy and increased economic productivity.

Where there is a saturation of licensed premises, for example in a city centre, competition drives down the price of alcohol which encourages additional consumption. An authority wide over-provision policy backed by public health would lessen 'competition by price' and so limit availability of alcohol to young people, which is an indicator of harm .

The World Health Organisation has reported that availability effects levels of harm therefore Licensing Authorities should be able to control the availability of alcohol.

Page Score

0

## **Page 10: Freeing up responsible businesses**

Q27. The government has committed to consult on giving licensing authorities greater freedom to take decisions that reflect the needs of their local community. Following the government's Red Tape Challenge in 2011, three areas of reform were specified: alcohol licensing for certain types of premises providing minimal alcohol sales, temporary event notices (TENs) and the licensing of late night refreshment. This section asks for views on these proposals and suggests further ways to reduce burdens on business. The proposals set out here can be seen alongside work undertaken by the Department for Culture, Media and Sport to remove unnecessary red tape from regulated entertainment. More information on each of these areas for

reform is available in the full consultation document. There are five subjects covered in this section. They are: ancillary sales of alcohol occasional provision of licensable activities at community events an extension of the temporary event notice limit at individual premises late night refreshment, and further proposals to reduce burdens on business Do you want to answer questions on freeing up responsible businesses? Please select one option.

Yes

Score

0

Page Score

0

## Page 11: Freeing up responsible businesses

Q28. Ancillary sales of alcohol For many businesses, the sale of alcohol is only a small part of, or incidental to, their wider activities, and occurs alongside the provision of another product or service (which this consultation refers to as an 'ancillary sale'). For example, a guesthouse might wish to provide wine to its guests with an evening meal or a complimentary bottle of wine in a guest's room, while a hairdresser might wish to offer clients a glass of wine. 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
<b>The provision should be limited to a specific list of certain types of business and the kinds of sales they make</b>			X
<b>The provision should be available to all businesses providing they meet certain qualification criteria to be an ancillary seller</b>		X	
<b>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 the above options</b>		X	

Score

0

Q29. If special provisions 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.

	Yes	No	Don't know

<b>Accommodation providers, providing alcohol alongside accommodation as part of the contract</b>		X	
<b>Hair and beauty salons, providing alcohol alongside a hair or beauty treatment</b>		X	
<b>Florists, providing alcohol alongside the purchase of flowers</b>		X	
<b>Cultural organisations, such as theatres, cinemas and museums, providing alcohol alongside cultural events as part of the entry ticket</b>		X	
<b>Regular charitable events, providing alcohol as part of the wider occasion</b>		X	

Score

0

Q30. 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 suggestions in the box below, keeping your views to a maximum of 200 words:

In principle, we disagree with the 'need to free up business' in relation to alcohol. It should not be treated as an everyday, ordinary product.

Any sale of alcohol should be regulated. Therefore there are no types of premises for alcohol sales which should be unregulated. Unregulated alcohol sales would create a situation where the objectives of the Licensing Act 2003 would be unenforceable.

The licensed sale of alcohol also protects and ensures a standard of 'due diligence' is adhered to by people selling alcohol.

This proposal would create a third tier of licensed premises as it would create a category outside Early Morning Restriction Orders/Late Night Levy and CIPs. This would create confusion for consumers and enforcement officers and lead to increased costs for public sector organisations dealing with the harmful effects of alcohol.

This extra category of licensed premises could be contributing to the harm of excessive alcohol consumption but would not contribute to the costs, for example through a Late Night Levy being applied to licensed premises.

Q31. 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. Alternatively, a second option is to broaden the definition of 'ancillary sales' to include all businesses (and/or not for profit activities) through the use of a general set of qualification criteria, for example, to the effect that: alcohol must be sold or supplied as a small part or proportion of a sales transaction or contract for a wider service, and the

amount of alcohol that could be supplied as part of that contract cannot exceed a prescribed amount Do you think that the qualification criteria proposed meet this aim?

No

***Please use the space below to provide further comments (keeping your views to a maximum of 200 words):***

We don't agree with the 'ancillary seller' status because there is no mechanism to police these businesses, and ensure that they retail alcohol responsibly. The scheme would also take the sale of alcohol out of the remit of the four objectives of the Licensing Act 2003 and the proposed objective of 'Public Health' thus undermining the Licensing Act. The 'ancillary sellers' of alcohol in the retail environment would not come under the same protection afforded by the Licensing Act or necessarily receive appropriate training therefore creating a three tier system which cannot be monitored, supported or enforced. In addition people purchasing from an 'ancillary seller' need to understand they are purchasing from an unregulated 'ancillary seller' and are therefore not necessarily making a reputable or safe purchase, for example safeguarding underage sales.

Score

0

Q32. Do you think that these proposals would significantly reduce the burdens on ancillary sellers? Please select one option in each row.

***No Response***

Score

0

Q33. Do you think these proposals would impact adversely on one or more of the licensing objectives? Please select one option.

	Yes	No	Don't know
<b>Allow premises making ancillary sales to request in their premises licence application that the requirement for a personal licence holder be removed</b>	X		
<b>Introduce a new, light-touch form of authorisation for premises making ancillary sales - an ASN but retaining the need for a personal licence holder</b>	X		
<b>Introduce a new, light touch form of authorisation for premises making ancillary sales - an ASN - with no requirement for a personal licence holder</b>	X		

Score

0

Q34. 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 response to a maximum of 200 words:  
We do not agree with any deregulation or unregulated sales of alcohol. The consumption of alcohol should be de-normalised in our society. This can be achieved through proper regulation which would help to reduce consumption with resulting benefits to the health and wellbeing of society.

Page Score

0

## Page 12: Freeing up responsible businesses

Q35. 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.

No

Score

0

Q36. 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
Reduce the burden		X	
Increase the burden	X		

Score

0

Page Score

0

## Page 13: Freeing up responsible businesses

Q37. Should the number of TENS which can be given in respect of individual premises be increased? Please select one option.

No

Score

0

Q38. If you answered yes, please select one option to indicate which you would prefer. Please select one option.

**No Response**

Score

0

Page Score

0

## Page 14: Freeing up responsible businesses

Q39. 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
<b>Determining that premises in certain areas are exempt</b>		X	
<b>Determining that certain premises types are exempt in their local area</b>		X	

Score

0

Q40. 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.

No

Score

0

Q41. 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).

*No Response*

Page Score

0

## Page 15: Freeing up responsible businesses

Q42. Do you agree with each of the following proposals? Please select one option in each row.

	Yes	No	Don't know
<b>Remove requirements to advertise licensing applications in local newspapers</b>		X	
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs for the on and off-trade</b>		X	
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs, but only in respect of overnight accommodation - lodges</b>		X	
<b>Remove or simplify requirements to renew personal licences under the 2003 Act</b>		X	

Score

0

Q43. 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
<b>Remove requirements to advertise licensing applications in local newspapers</b>			X
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs for the on and off-trade</b>		X	
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs, but only in respect of overnight accommodation - lodges</b>		X	
<b>Remove or simplify requirements to renew personal licences under the 2003 Act</b>		X	

Score

0

Q44. 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.

	Yes	No	Don't know
<b>Remove requirements to advertise licensing applications in local newspapers</b>	X		
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs for the on and off-trade</b>	X		
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs, but only in respect of overnight accommodation - lodges</b>	X		
<b>Remove or simplify requirements to renew personal licences under the 2003 Act</b>	X		

Score

0

Q45. 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 keep your views to a maximum of 200 words.)

There are no processes that could be removed or simplified without having an adverse effect on the licensing objectives or increasing the burden on responsible authorities or the local community.

Page Score

0

## Page 16: Impact assessments

Q46. Impact assessments for the proposals in this consultation have been published alongside the full consultation document. 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
<b>Minimum unit pricing</b>		X	
<b>Multi-buy promotions</b>			X
<b>Health as a licensing objective for cumulative impact</b>			X
<b>Ancillary sales of alcohol</b>			X
<b>Temporary event notices</b>			X
<b>Late night refreshment</b>			X
<b>Removing the duty to advertise licence applications in a local newspaper</b>			X
<b>Sales of alcohol at motorway service stations</b>			X
<b>Personal licences</b>			X

Score

0

Q47. Do you have any comments on the methodologies or assumptions used in the impact assessments? If yes, please specify in the box below, clearly referencing the impact assessment and page to which you refer (keeping your views to a maximum of 400 words).

We have not seen the methodologies used to support the conclusions for the effectiveness of a 45p minimum unit price in section 5 of the consultation. As this information is not available we have used as evidence the findings of the University of Sheffield's SchARR report (2009) as this is the only UK peer reviewed research into the effects of minimum unit pricing. The cost of alcohol harm to Liverpool is more than £228 million per year and at North West level, calculated to be more than £3 billion. These costs are unsustainable. We strongly support setting the minimum unit price level at 50p which would reduce these very high costs to society and public services. The SchARR report modelling has shown a 50p level annually would, after 10 years :

- o Save 3,060 lives

- o Reduction hospital admissions by 97,700
- o Result in 442,300 fewer days absent from work
- o Reduce crimes by 42,500

We have principled problems responding to several questions due to the way some questions and impact assessments are written. Therefore we have left some responses blank.

Q16 A. - We cannot answer this question as we believe that, as a matter of principle, we do not believe that there should be any reduction in the regulation of alcohol.

Q20 - As a matter of principle, we do not believe that there should be any reduction in the regulation of alcohol.

Q31 A. - The question is constructed in such a way that seems to assume the outcome of the proposal to remove this requirement. We disagree with this proposal and believe that this will increase alcohol consumption which increases burdens to businesses.

Q34 B. - The principles adopted by the impact assessment look good, we do not feel there is sufficient information given to enable us to answer this question.

Page Score

0

## Scoring Summary

Pages	Total
1. About you	0
2. A minimum unit price for alcohol	0
3. A minimum unit price for alcohol	0
4. A ban on multi-buy promotions in the off-trade	0
5. A ban on multi-buy promotions in the off-trade	0
6. Reviewing the mandatory licensing conditions	0
7. Reviewing the mandatory licensing conditions	0
8. Health as a licensing objective for cumulative impact policies	0
9. Health as a licensing objective for cumulative impact policies	0

10. Freeing up responsible businesses	0
11. Freeing up responsible businesses	0
12. Freeing up responsible businesses	0
13. Freeing up responsible businesses	0
14. Freeing up responsible businesses	0
15. Freeing up responsible businesses	0
16. Impact assessments	0
<b>Total Survey Score:</b>	<b>0</b>

# Alcohol strategy consultation

User Details - 5441225

**Date Started:** 01/02/2013 15:14:46    **Date Ended:** 04/02/2013 17:26:51

**Time taken:** 74 hrs, 12 mins, 5 secs    **IP Address:** n/a

**Unique ID:** n/a

## Page 1: About you

Q1. Please select if you would like your response or personal details to be treated as confidential.

*No Response*

Score

0

Q2. Which of the following best describes you or the professional interest you represent? Please select one option from the menu below.

Licensing authority

***Please specify which organisation, licensing authority or police force you represent in the box below:***

L B Havering

Score

0

Q3. If you are responding on behalf of an organisation or interest group, please write in the box below the number of members in your group or organisation.

*No Response*

Q4. How did you obtain the views of your members? Please explain in the box below keeping your response to a maximum of 100 words.

*No Response*

Q5. Please indicate in which region you or your organisation is based. Please select one option from the menu below.

*No Response*

Score

0

Q6. If you are responding as a member of the public, what is your gender? Please select one option.

*No Response*

Score

0

Q7. If you are responding as a member of the public, what is your age? Please select one option.

No Response

Score

0

Page Score

0

## Page 2: A minimum unit price for alcohol

Q8. In the alcohol strategy, the government committed to introducing a minimum unit price for alcohol in England and Wales. This consultation will contribute to the debate on the most appropriate price per unit and the mechanism by which, once set, minimum unit pricing would remain effective. It is also an opportunity for interested parties to raise other issues around minimum unit pricing. The purpose of minimum unit pricing is to reduce alcohol consumption, particularly by the most hazardous and harmful drinkers who tend to show a preference for the cheapest alcohol products. By doing so the government estimates there will be a reduction in the associated crime and health harms, especially the numbers of hospital admissions, alcohol-related deaths and alcohol-related crimes. Minimum unit pricing is not intended disproportionately to affect responsible drinkers or particular social groups but to reduce the availability of alcohol sold at very low or heavily discounted prices. More information (including the definitions of hazardous and harmful drinkers) is available in the full consultation document and the impact assessment. Do you want to answer questions on minimum unit pricing? Please select one option.

Yes

Score

0

Page Score

0

## Page 3: A minimum unit price for alcohol

Q9. The impact of minimum unit pricing will depend on the price per unit of alcohol. The government wants to ensure that the chosen price level is targeted and proportionate, whilst achieving a significant reduction of harm. The government is therefore consulting on the introduction of a recommended minimum unit price of 45p. The government estimates a reduction in consumption across all product types of 3.3 per cent, a reduction in crime of 5,240 per year, a reduction in 24,600 alcohol-related hospital admissions and 714 fewer deaths per year after ten years. Do you agree that this minimum unit price level would achieve these aims? Please select one option.

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):***

45p is ok as it will not affect the on trade but will affect the off trade and sale of cheap alcohol. It would seem sensible to have uniformity across the

British Isles and have 50p everywhere. The price will be unlikely to affect the hardened drinkers but will affect moderate drinkers who may feel that they are being penalised.

Score

0

Q10. Should other factors or evidence be considered when setting a minimum unit price for alcohol? Please select one option.

Don't know

Score

0

Q11. The government wishes to maintain the effectiveness of minimum unit pricing and is therefore proposing to adjust the minimum unit price level over time. 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

Score

0

Q12. 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

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

the trade may have reduced sales so we may have premises closing.

Score

0

Page Score

0

## **Page 4: A ban on multi-buy promotions in the off-trade**

Q13. The government is consulting on introducing a ban on multi-buy promotions in the off-trade (e.g. shops and off-licences) as part of its wider strategy to reduce excessive alcohol consumption, and alongside the introduction of a minimum unit price. A ban on multi-buy promotions would therefore not apply to pubs, clubs, bars or restaurants. The term 'multi-buy promotions' refers to alcohol promotions that offer a discount for buying multiple items. 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. As well as being part of a wider strategy to reduce consumption and tackle irresponsible alcohol sales, a ban on multi-buy promotions would also contribute to the government's aim of encouraging people to be aware of how much they drink and the risks of excessive

drinking, so that they can make informed choices. The aim of this consultation is to assess support for such a ban and contribute to our understanding of the impact a ban on multi-buy promotions may have. The types of promotion it is proposed that a ban would include, are: two for the price of one, three for the price of two, buy one get one free, buy six and get 20 per cent off, 24 cans of lager costing less than 24 times the cost of a single 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, 3 for £10 where each bottle costs more than £3.33. More information is available in the full consultation document and the impact assessment. Do you want to answer questions on a ban on multi-buy promotions in the off-trade? Please select one option.

Yes

Score

0

Page Score

0

## Page 5: A ban on multi-buy promotions in the off-trade

Q14. Do you think there should be a ban on multi-buy promotions involving alcohol in the off-trade? Please select one option.

Yes

Score

0

Q15. Are there any further offers which should be included in a ban on multi-buy promotions? Please select one option.

No

Score

0

Q16. Should other factors or evidence be taken into account when considering a ban on multi-buy promotions? Please select one option.

Don't know

Score

0

Q17. 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

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

The responsible drinkers who can buy alcohol cheaply but don't abuse it and take advantage of the special offers will be affected.

Score

0

## Page 6: Reviewing the mandatory licensing conditions

Q18. 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 alcohol 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. The government has also committed to consult on whether these mandatory licensing conditions should, where relevant, apply to both the on- and off-trade. This consultation forms part of that review, and will contribute to the government's understanding of how these mandatory conditions are perceived. The five mandatory licensing conditions currently set out in regulations in relation to the supply of alcohol are: a ban on irresponsible promotions a ban on dispensing alcohol by one person directly into the mouth of another a requirement to provide free tap water on request to customers a requirement to have an age verification policy to prevent the sale of alcohol to persons under 18 years of age, and a requirement to make available to customers small measures such as half pints or beer or cider or 125ml glasses of wine More information is available in the full consultation document. An explanation of each of these terms can be found on page 20 of the consultation document, in the glossary at the end. Do you want to answer questions on reviewing the mandatory licensing conditions? Please select one option.

Yes

Score

0

Page Score

0

## Page 7: Reviewing the mandatory licensing conditions

Q19. Do you think each of the mandatory licensing conditions is effective in promoting the licensing objectives? For more information on the licensing objectives please see the glossary at the end of the full consultation document. Please select one option (Yes, No, Don't know) from each drop down menu.

	Prevention of crime and disorder	Public safety	Prevention of public nuisance	Protection of children from harm
Irresponsible promotions	No	No	No	Yes

<b>Dispensing alcohol directly into the mouth</b>	Yes	Yes	Yes	Yes
<b>Mandatory provision of free tap water</b>	Yes	Yes	Yes	Yes
<b>Age verification policy</b>	Yes	Yes	Yes	No
<b>Mandatory provision of small measures</b>	Yes	Yes	Yes	Yes

Score

0

Q20. Do you think that the mandatory licensing conditions do enough to target irresponsible promotions in pubs and clubs? Please select one option.

No

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

The conditions in general are difficult to enforce. The drinks promotions can be difficult to interpret for successful enforcement action.

Score

0

Q21. Are there other issues related to the licensing objectives which could be tackled through a mandatory licensing condition? Please select one option.

Don't know

Score

0

Q22. Do you think that 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.

No

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

There has been an increase in the number of off sales premises. Whilst these premises don't tend to cause problems with crime and disorder they do contribute to problems with the late night economy by selling alcohol cheaply and people pre loading.

Score

0

Page Score

0

## Page 8: Health as a licensing objective for cumulative impact policies

Q23. We want to ensure that licensing authorities are able to take alcohol-related health harms into consideration when making decisions about cumulative impact policies (CIPs) which can be used to manage problems linked to the density of premises in specific areas. 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. We are proposing 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. We expect that those areas with the highest levels of alcohol-related health harm, or fast rising levels of harm from alcohol, will be most likely to use this power. It 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. More information is available in the full consultation document and impact assessment. Do you want to answer questions on health as a licensing objective for cumulative impact policies? Please select one option.

Yes

Score

0

Page Score

0

## Page 9: Health as a licensing objective for cumulative impact policies

Q24. 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):

Ambulance data , A&E admission data related to alcohol related harms.

Q25. 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

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

Health isn't included as a licensing objective . If the public safety objective was modified to state public safety and public health then it would be easier to include health.

Score

0

Q26. 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 your answer in the box below, providing evidence to support your response (keeping your views to a maximum of 200 words):

To introduce a cip you need to have evidence and it may be difficult to get health data down to street level. It may need to Borough wide. You have to consider appeal decisions taken in the magistrates court where many Licensing Authority decisions are overturned. Health harms are often historical and may not relate to existing premises and could be argued by licensing solicitors/barristers that it is nothing to do with the new premises licence applicant.

Page Score

0

## Page 10: Freeing up responsible businesses

Q27. The government has committed to consult on giving licensing authorities greater freedom to take decisions that reflect the needs of their local community. Following the government's Red Tape Challenge in 2011, three areas of reform were specified: alcohol licensing for certain types of premises providing minimal alcohol sales, temporary event notices (TENs) and the licensing of late night refreshment. This section asks for views on these proposals and suggests further ways to reduce burdens on business. The proposals set out here can be seen alongside work undertaken by the Department for Culture, Media and Sport to remove unnecessary red tape from regulated entertainment. More information on each of these areas for reform is available in the full consultation document. There are five subjects covered in this section. They are: ancillary sales of alcohol occasional provision of licensable activities at community events an extension of the temporary event notice limit at individual premises late night refreshment, and further proposals to reduce burdens on business Do you want to answer questions on freeing up responsible businesses? Please select one option.

Yes

Score

0

Page Score

0

## Page 11: Freeing up responsible businesses

Q28. Ancillary sales of alcohol For many businesses, the sale of alcohol is only a small part of, or incidental to, their wider activities, and occurs alongside the provision of another product or service (which this consultation refers to as an 'ancillary sale'). For example, a guesthouse might wish to provide wine to its guests with an evening meal or a

complimentary bottle of wine in a guest's room, while a hairdresser might wish to offer clients a glass of wine. 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
<b>The provision should be limited to a specific list of certain types of business and the kinds of sales they make</b>	X		
<b>The provision should be available to all businesses providing they meet certain qualification criteria to be an ancillary seller</b>		X	
<b>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 the above options</b>		X	

Score

0

Q29. If special provisions 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.

	Yes	No	Don't know
<b>Accommodation providers, providing alcohol alongside accommodation as part of the contract</b>		X	
<b>Hair and beauty salons, providing alcohol alongside a hair or beauty treatment</b>		X	
<b>Florists, providing alcohol alongside the purchase of flowers</b>	X		
<b>Cultural organisations, such as theatres, cinemas and museums, providing alcohol alongside cultural events as part of the entry ticket</b>		X	
<b>Regular charitable events, providing alcohol as part of the wider occasion</b>		X	

Score

0

Q30. 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 suggestions in the box below, keeping your views to a maximum of 200 words:

*No Response*

Q31. 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. Alternatively, a second option is to broaden the definition of 'ancillary sales' to include all businesses (and/or not for profit activities) through the use of a general set of qualification criteria, for example, to the effect that: alcohol must be sold or supplied as a small part or proportion of a sales transaction or contract for a wider service, and the amount of alcohol that could be supplied as part of that contract cannot exceed a prescribed amount. Do you think that the qualification criteria proposed meet this aim?

Don't know

***Please use the space below to provide further comments (keeping your views to a maximum of 200 words):***

Ancillary sales need to be tightly defined. Ancillary sales seems to act against the principle of deregulation by bringing some premises into the licensing regime which have previously been outside of it. Holiday lets who supply a bottle of wine are not generally licensed but this would bring them into licensing. Ancillary depend on the degree of alcohol being sold and could be very difficult to come up with a definition. People will always look for loopholes.

Score

0

Q32. 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
<b>Allow premises making ancillary sales to request in their premises licence application that the requirement for a personal licence holder be removed</b>		X	
<b>Introduce a new, light-touch form of authorisation for premises making ancillary sales - an ASN but retaining the need for a personal licence holder</b>	X		
<b>Introduce a new, light touch form of authorisation for premises making ancillary sales - an ASN - with no requirement for a personal licence holder</b>		X	

Score

0

Q33. Do you think these proposals would impact adversely on one or more of the licensing objectives? Please select one option.

	Yes	No	Don't know
<b>Allow premises making ancillary sales to request in their premises licence application that the requirement for a personal licence holder be removed</b>		X	
<b>Introduce a new, light-touch form of authorisation for premises making ancillary sales - an ASN but retaining the need for a personal licence holder</b>	X		
<b>Introduce a new, light touch form of authorisation for premises making ancillary sales - an ASN - with no requirement for a personal licence holder</b>		X	

Score

0

Q34. 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 response to a maximum of 200 words:

Licensing authorities need to know where premises are so an ASN could be suitable but with a personal licence holder. They will have been trained and will understand the licensing objectives and the legislation related to sale of alcohol.

Page Score

0

## Page 12: Freeing up responsible businesses

Q35. 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.

No

Score

0

Q36. 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
<b>Reduce the burden</b>		X	
<b>Increase the burden</b>	X		

Score

0

Page Score

0

## Page 13: Freeing up responsible businesses

Q37. Should the number of TENS which can be given in respect of individual premises be increased? Please select one option.

Yes

Score

0

Q38. If you answered yes, please select one option to indicate which you would prefer. Please select one option.

15

Score

0

Page Score

0

## Page 14: Freeing up responsible businesses

Q39. 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
<b>Determining that premises in certain areas are exempt</b>		X	
<b>Determining that certain premises types are exempt in their local area</b>	X		

Score

0

Q40. 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

Score

0

Q41. 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).

**No Response**

Page Score

0

## Page 15: Freeing up responsible businesses

Q42. Do you agree with each of the following proposals? Please select

one option in each row.

	Yes	No	Don't know
<b>Remove requirements to advertise licensing applications in local newspapers</b>	X		
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs for the on and off-trade</b>		X	
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs, but only in respect of overnight accommodation - lodges</b>	X		
<b>Remove or simplify requirements to renew personal licences under the 2003 Act</b>		X	

Score

0

Q43. 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
<b>Remove requirements to advertise licensing applications in local newspapers</b>	X		
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs for the on and off-trade</b>		X	
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs, but only in respect of overnight accommodation - lodges</b>	X		
<b>Remove or simplify requirements to renew personal licences under the 2003 Act</b>	X		

Score

0

Q44. 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.

	Yes	No	Don't know
<b>Remove requirements to advertise licensing applications in local newspapers</b>		X	

<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs for the on and off-trade</b>	X		
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs, but only in respect of overnight accommodation - lodges</b>		X	
<b>Remove or simplify requirements to renew personal licences under the 2003 Act</b>	X		

Score

0

Q45. 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 keep your views to a maximum of 200 words.)

Application forms could be simplified. Why do you need to know the NI number for someone applying for a TEN?

Page Score

0

## Page 16: Impact assessments

Q46. Impact assessments for the proposals in this consultation have been published alongside the full consultation document. 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
<b>Minimum unit pricing</b>			X
<b>Multi-buy promotions</b>	X		
<b>Health as a licensing objective for cumulative impact</b>		X	
<b>Ancillary sales of alcohol</b>		X	
<b>Temporary event notices</b>		X	
<b>Late night refreshment</b>		X	
<b>Removing the duty to advertise licence applications in a local newspaper</b>	X		
<b>Sales of alcohol at motorway service stations</b>		X	

<b>Personal licences</b>		X	
--------------------------	--	---	--

Score

0

Q47. Do you have any comments on the methodologies or assumptions used in the impact assessments? If yes, please specify in the box below, clearly referencing the impact assessment and page to which you refer (keeping your views to a maximum of 400 words).

*No Response*

Page Score

0

## Scoring Summary

Pages	Total
1. About you	0
2. A minimum unit price for alcohol	0
3. A minimum unit price for alcohol	0
4. A ban on multi-buy promotions in the off-trade	0
5. A ban on multi-buy promotions in the off-trade	0
6. Reviewing the mandatory licensing conditions	0
7. Reviewing the mandatory licensing conditions	0
8. Health as a licensing objective for cumulative impact policies	0
9. Health as a licensing objective for cumulative impact policies	0
10. Freeing up responsible businesses	0
11. Freeing up responsible businesses	0
12. Freeing up responsible businesses	0
13. Freeing up responsible businesses	0
14. Freeing up responsible businesses	0

15. Freeing up responsible businesses	0
16. Impact assessments	0
<b>Total Survey Score:</b>	<b>0</b>

# Alcohol strategy consultation

User Details - 5458687

**Date Started:** 04/02/2013 19:37:03 **Date Ended:** 04/02/2013 20:01:39

**Time taken:** 24 mins, 36 secs **IP Address:** n/a

**Unique ID:** n/a

## Page 1: About you

Q1. Please select if you would like your response or personal details to be treated as confidential.

*No Response*

***Please provide your reasons in the box below:***

Working as a hepatologist in district general hospital in the North of England I encounter the detrimental effects of alcohol almost every day at work, in its multiple forms: liver disease, brain injury secondary alcohol, polyneuropathy, cardiac problems and memory problems. In addition I witness the effect on their families. For this reason I strongly support the minimum pricing of alcohol and would even advocate a higher minimum price of 50 pence per as advocated by the BSG. In addition many of patients have voiced their support to an increase in the price of alcohol and feel it might have helped them. The only proposal among the 5 being put forward that I do not support is the cutting of red tape for responsible licenses as I fear it will have detrimental effect and increase the problem (as highlighted by the alcohol health alliance).

Score

0

Q2. Which of the following best describes you or the professional interest you represent? Please select one option from the menu below.

Member of the public

***Please specify which organisation, licensing authority or police force you represent in the box below:***

none as detailed above - member of the public. I am working in the NHS as a doctor.

Score

0

Q3. If you are responding on behalf of an organisation or interest group, please write in the box below the number of members in your group or organisation.

*No Response*

Q4. How did you obtain the views of your members? Please explain in the box below keeping your response to a maximum of 100 words.

*No Response*

Q5. Please indicate in which region you or your organisation is based. Please select one option from the menu below.

*No Response*

Score

0

Q6. If you are responding as a member of the public, what is your gender? Please select one option.

Female

Score

0

Q7. If you are responding as a member of the public, what is your age? Please select one option.

35-54

Score

0

Page Score

0

## Page 2: A minimum unit price for alcohol

Q8. In the alcohol strategy, the government committed to introducing a minimum unit price for alcohol in England and Wales. This consultation will contribute to the debate on the most appropriate price per unit and the mechanism by which, once set, minimum unit pricing would remain effective. It is also an opportunity for interested parties to raise other issues around minimum unit pricing. The purpose of minimum unit pricing is to reduce alcohol consumption, particularly by the most hazardous and harmful drinkers who tend to show a preference for the cheapest alcohol products. By doing so the government estimates there will be a reduction in the associated crime and health harms, especially the numbers of hospital admissions, alcohol-related deaths and alcohol-related crimes. Minimum unit pricing is not intended disproportionately to affect responsible drinkers or particular social groups but to reduce the availability of alcohol sold at very low or heavily discounted prices. More information (including the definitions of hazardous and harmful drinkers) is available in the full consultation document and the impact assessment. Do you want to answer questions on minimum unit pricing? Please select one option.

Yes

Score

0

Page Score

0

## Page 3: A minimum unit price for alcohol

Q9. The impact of minimum unit pricing will depend on the price per unit of

alcohol. The government wants to ensure that the chosen price level is targeted and proportionate, whilst achieving a significant reduction of harm. The government is therefore consulting on the introduction of a recommended minimum unit price of 45p. The government estimates a reduction in consumption across all product types of 3.3 per cent, a reduction in crime of 5,240 per year, a reduction in 24,600 alcohol-related hospital admissions and 714 fewer deaths per year after ten years. Do you agree that this minimum unit price level would achieve these aims? Please select one option.

Yes

***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):***

I feel a minimum price of 50 pence per litre would achieve a higher reductions in crime, hospital admission and death over time.

Score

0

Q10. Should other factors or evidence be considered when setting a minimum unit price for alcohol? Please select one option.

Don't know

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

many patients suffering from alcohol related disease are actually in favour of minimum pricing

Score

0

Q11. The government wishes to maintain the effectiveness of minimum unit pricing and is therefore proposing to adjust the minimum unit price level over time. 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

Score

0

Q12. 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.

Don't know

Score

0

Page Score

0

**Page 4: A ban on multi-buy promotions in the off-trade**

Q13. The government is consulting on introducing a ban on multi-buy promotions in the off-trade (e.g. shops and off-licences) as part of its wider strategy to reduce excessive alcohol consumption, and alongside the introduction of a minimum unit price. A ban on multi-buy promotions would therefore not apply to pubs, clubs, bars or restaurants. The term 'multi-buy promotions' refers to alcohol promotions that offer a discount for buying multiple items. 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. As well as being part of a wider strategy to reduce consumption and tackle irresponsible alcohol sales, a ban on multi-buy promotions would also contribute to the government's aim of encouraging people to be aware of how much they drink and the risks of excessive drinking, so that they can make informed choices. The aim of this consultation is to assess support for such a ban and contribute to our understanding of the impact a ban on multi-buy promotions may have. The types of promotion it is proposed that a ban would include, are: two for the price of one, three for the price of two, buy one get one free, buy six and get 20 per cent off, 24 cans of lager costing less than 24 times the cost of a single 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, 3 for £10 where each bottle costs more than £3.33. More information is available in the full consultation document and the impact assessment. Do you want to answer questions on a ban on multi-buy promotions in the off-trade? Please select one option.

Yes

Score

0

Page Score

0

## Page 5: A ban on multi-buy promotions in the off-trade

Q14. Do you think there should be a ban on multi-buy promotions involving alcohol in the off-trade? Please select one option.

Yes

Score

0

Q15. Are there any further offers which should be included in a ban on multi-buy promotions? Please select one option.

Don't know

Score

0

Q16. Should other factors or evidence be taken into account when considering a ban on multi-buy promotions? Please select one option.

No

Score

0

Q17. 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.

No

Score

0

Page Score

0

## Page 6: Reviewing the mandatory licensing conditions

Q18. 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 alcohol 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. The government has also committed to consult on whether these mandatory licensing conditions should, where relevant, apply to both the on- and off-trade. This consultation forms part of that review, and will contribute to the government's understanding of how these mandatory conditions are perceived. The five mandatory licensing conditions currently set out in regulations in relation to the supply of alcohol are: a ban on irresponsible promotionsa ban on dispensing alcohol by one person directly into the mouth of anothera requirement to provide free tap water on request to customersa requirement to have an age verification policy to prevent the sale of alcohol to persons under 18 years of age, anda requirement to make available to customers small measures such as half pints or beer or cider or 125ml glasses of wine More information is available in the full consultation document. An explanation of each of these terms can be found on page 20 of the consultation document, in the glossary at the end. Do you want to answer questions on reviewing the mandatory licensing conditions? Please select one option.

Yes

Score

0

Page Score

0

## Page 7: Reviewing the mandatory licensing conditions

Q19. Do you think each of the mandatory licensing conditions is effective in promoting the licensing objectives? For more information on the licensing objectives please see the glossary at the end of the full consultation

document. Please select one option (Yes, No, Don't know) from each drop down menu.

	<b>Prevention of crime and disorder</b>	<b>Public safety</b>	<b>Prevention of public nuisance</b>	<b>Protection of children from harm</b>
<b>Irresponsible promotions</b>	Don't know	Yes	Yes	Yes
<b>Dispensing alcohol directly into the mouth</b>	Don't know	Yes	Yes	Yes
<b>Mandatory provision of free tap water</b>	Don't know	Yes	Yes	No
<b>Age verification policy</b>	No	Don't know	Don't know	Yes
<b>Mandatory provision of small measures</b>	Yes	Yes	Yes	Yes

Score

0

Q20. Do you think that the mandatory licensing conditions do enough to target irresponsible promotions in pubs and clubs? Please select one option.

No

Score

0

Q21. Are there other issues related to the licensing objectives which could be tackled through a mandatory licensing condition? Please select one option.

Don't know

Score

0

Q22. Do you think that 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

Score

0

Page Score

0

**Page 8: Health as a licensing objective for**

## **cumulative impact policies**

Q23. We want to ensure that licensing authorities are able to take alcohol-related health harms into consideration when making decisions about cumulative impact policies (CIPs) which can be used to manage problems linked to the density of premises in specific areas. 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. We are proposing 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. We expect that those areas with the highest levels of alcohol-related health harm, or fast rising levels of harm from alcohol, will be most likely to use this power. It 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. More information is available in the full consultation document and impact assessment. Do you want to answer questions on health as a licensing objective for cumulative impact policies? Please select one option.

Yes

Score

0

Page Score

0

## **Page 9: Health as a licensing objective for cumulative impact policies**

Q24. 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):

growing number of patients with alcohol related illness and death in line with increasing consumption and availability of alcohol

Q25. 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.

Don't know

Score

0

Q26. 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 your answer in the

box below, providing evidence to support your response (keeping your views to a maximum of 200 words):

**No Response**

Page Score

0

## Page 10: Freeing up responsible businesses

Q27. The government has committed to consult on giving licensing authorities greater freedom to take decisions that reflect the needs of their local community. Following the government's Red Tape Challenge in 2011, three areas of reform were specified: alcohol licensing for certain types of premises providing minimal alcohol sales, temporary event notices (TENs) and the licensing of late night refreshment. This section asks for views on these proposals and suggests further ways to reduce burdens on business. The proposals set out here can be seen alongside work undertaken by the Department for Culture, Media and Sport to remove unnecessary red tape from regulated entertainment. More information on each of these areas for reform is available in the full consultation document. There are five subjects covered in this section. They are: ancillary sales of alcohol, occasional provision of licensable activities at community events, an extension of the temporary event notice limit at individual premises, late night refreshment, and further proposals to reduce burdens on business. Do you want to answer questions on freeing up responsible businesses? Please select one option.

Yes

Score

0

Page Score

0

## Page 11: Freeing up responsible businesses

Q28. Ancillary sales of alcohol For many businesses, the sale of alcohol is only a small part of, or incidental to, their wider activities, and occurs alongside the provision of another product or service (which this consultation refers to as an 'ancillary sale'). For example, a guesthouse might wish to provide wine to its guests with an evening meal or a complimentary bottle of wine in a guest's room, while a hairdresser might wish to offer clients a glass of wine. 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
<b>The provision should be limited to a specific list of certain types of business and the kinds of</b>	X		

<b>sales they make</b>			
<b>The provision should be available to all businesses providing they meet certain qualification criteria to be an ancillary seller</b>		X	
<b>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 the above options</b>		X	

Score

0

Q29. If special provisions 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.

	Yes	No	Don't know
<b>Accommodation providers, providing alcohol alongside accommodation as part of the contract</b>		X	
<b>Hair and beauty salons, providing alcohol alongside a hair or beauty treatment</b>		X	
<b>Florists, providing alcohol alongside the purchase of flowers</b>		X	
<b>Cultural organisations, such as theatres, cinemas and museums, providing alcohol alongside cultural events as part of the entry ticket</b>		X	
<b>Regular charitable events, providing alcohol as part of the wider occasion</b>	X		

Score

0

Q30. 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 suggestions in the box below, keeping your views to a maximum of 200 words:

**No Response**

Q31. 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. Alternatively, a second option is to broaden the definition of 'ancillary sales' to include all businesses (and/or not for

profit activities) through the use of a general set of qualification criteria, for example, to the effect that: alcohol must be sold or supplied as a small part or proportion of a sales transaction or contract for a wider service, and the amount of alcohol that could be supplied as part of that contract cannot exceed a prescribed amount Do you think that the qualification criteria proposed meet this aim?

Don't know

Score

0

Q32. 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
<b>Allow premises making ancillary sales to request in their premises licence application that the requirement for a personal licence holder be removed</b>		X	
<b>Introduce a new, light-touch form of authorisation for premises making ancillary sales - an ASN but retaining the need for a personal licence holder</b>		X	
<b>Introduce a new, light touch form of authorisation for premises making ancillary sales - an ASN - with no requirement for a personal licence holder</b>		X	

Score

0

Q33. Do you think these proposals would impact adversely on one or more of the licensing objectives? Please select one option.

	Yes	No	Don't know
<b>Allow premises making ancillary sales to request in their premises licence application that the requirement for a personal licence holder be removed</b>			X
<b>Introduce a new, light-touch form of authorisation for premises making ancillary sales - an ASN but retaining the need for a personal licence holder</b>			X
<b>Introduce a new, light touch form of authorisation for premises making ancillary sales - an ASN - with no requirement for a personal licence holder</b>			X

Score

0

Q34. 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 response to a maximum of 200 words:

*No Response*

Page Score

0

## Page 12: Freeing up responsible businesses

Q35. 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.

Don't know

Score

0

Q36. 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
Reduce the burden			X
Increase the burden			X

Score

0

Page Score

0

## Page 13: Freeing up responsible businesses

Q37. Should the number of TENs which can be given in respect of individual premises be increased? Please select one option.

No

Score

0

Q38. If you answered yes, please select one option to indicate which you would prefer. Please select one option.

*No Response*

Score

0

Page Score

0

## Page 14: Freeing up responsible businesses

Q39. 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
<b>Determining that premises in certain areas are exempt</b>			X
<b>Determining that certain premises types are exempt in their local area</b>			X

Score

0

Q40. 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

Score

0

Q41. 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).

*No Response*

Page Score

0

## Page 15: Freeing up responsible businesses

Q42. Do you agree with each of the following proposals? Please select one option in each row.

	Yes	No	Don't know
<b>Remove requirements to advertise licensing applications in local newspapers</b>		X	
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs for the on and off-trade</b>		X	
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs, but only in respect of overnight accommodation - lodges</b>		X	
<b>Remove or simplify requirements to renew personal licences under the 2003 Act</b>		X	

Score

0

Q43. 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
<b>Remove requirements to advertise licensing applications in local newspapers</b>			X
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs for the on and off-trade</b>			X
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs, but only in respect of overnight accommodation - lodges</b>			X
<b>Remove or simplify requirements to renew personal licences under the 2003 Act</b>			X

Score

0

Q44. 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.

	Yes	No	Don't know
<b>Remove requirements to advertise licensing applications in local newspapers</b>			X
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs for the on and off-trade</b>			X
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs, but only in respect of overnight accommodation - lodges</b>			X
<b>Remove or simplify requirements to renew personal licences under the 2003 Act</b>			X

Score

0

Q45. 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 keep your views to a maximum of 200 words.)

*No Response*

Page Score

0

## Page 16: Impact assessments

Q46. Impact assessments for the proposals in this consultation have been published alongside the full consultation document. 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
Minimum unit pricing			X
Multi-buy promotions			X
Health as a licensing objective for cumulative impact			X
Ancillary sales of alcohol			X
Temporary event notices			X
Late night refreshment			X
Removing the duty to advertise licence applications in a local newspaper			X
Sales of alcohol at motorway service stations			X
Personal licences			X

Score

0

Q47. Do you have any comments on the methodologies or assumptions used in the impact assessments? If yes, please specify in the box below, clearly referencing the impact assessment and page to which you refer (keeping your views to a maximum of 400 words).

*No Response*

Page Score

0

## Scoring Summary

Pages	Total
1. About you	0
2. A minimum unit price for alcohol	0
3. A minimum unit price for alcohol	0
4. A ban on multi-buy promotions in the	0

off-trade	
5. A ban on multi-buy promotions in the off-trade	0
6. Reviewing the mandatory licensing conditions	0
7. Reviewing the mandatory licensing conditions	0
8. Health as a licensing objective for cumulative impact policies	0
9. Health as a licensing objective for cumulative impact policies	0
10. Freeing up responsible businesses	0
11. Freeing up responsible businesses	0
12. Freeing up responsible businesses	0
13. Freeing up responsible businesses	0
14. Freeing up responsible businesses	0
15. Freeing up responsible businesses	0
16. Impact assessments	0
<b>Total Survey Score:</b>	<b>0</b>

# Alcohol strategy consultation

---

User Details - 5456212

**Date Started:** 04/02/2013 15:14:52    **Date Ended:** 04/02/2013 23:22:58

**Time taken:** 8 hrs, 8 mins, 6 secs    **IP Address:** n/a

**Unique ID:** n/a

---

## Page 1: About you

Q1. Please select if you would like your response or personal details to be treated as confidential.

*No Response*

Score

0

Q2. Which of the following best describes you or the professional interest you represent? Please select one option from the menu below.

*No Response*

Score

0

Q3. If you are responding on behalf of an organisation or interest group, please write in the box below the number of members in your group or organisation.

*No Response*

Q4. How did you obtain the views of your members? Please explain in the box below keeping your response to a maximum of 100 words.

*No Response*

Q5. Please indicate in which region you or your organisation is based. Please select one option from the menu below.

*No Response*

Score

0

Q6. If you are responding as a member of the public, what is your gender? Please select one option.

*No Response*

Score

0

Q7. If you are responding as a member of the public, what is your age? Please select one option.

*No Response*

Score

0

Page Score

0

## Page 2: A minimum unit price for alcohol

Q8. In the alcohol strategy, the government committed to introducing a minimum unit price for alcohol in England and Wales. This consultation will contribute to the debate on the most appropriate price per unit and the mechanism by which, once set, minimum unit pricing would remain effective. It is also an opportunity for interested parties to raise other issues around minimum unit pricing. The purpose of minimum unit pricing is to reduce alcohol consumption, particularly by the most hazardous and harmful drinkers who tend to show a preference for the cheapest alcohol products. By doing so the government estimates there will be a reduction in the associated crime and health harms, especially the numbers of hospital admissions, alcohol-related deaths and alcohol-related crimes. Minimum unit pricing is not intended disproportionately to affect responsible drinkers or particular social groups but to reduce the availability of alcohol sold at very low or heavily discounted prices. More information (including the definitions of hazardous and harmful drinkers) is available in the full consultation document and the impact assessment. Do you want to answer questions on minimum unit pricing? Please select one option.

Yes

Score

0

Page Score

0

## Page 3: A minimum unit price for alcohol

Q9. The impact of minimum unit pricing will depend on the price per unit of alcohol. The government wants to ensure that the chosen price level is targeted and proportionate, whilst achieving a significant reduction of harm. The government is therefore consulting on the introduction of a recommended minimum unit price of 45p. The government estimates a reduction in consumption across all product types of 3.3 per cent, a reduction in crime of 5,240 per year, a reduction in 24,600 alcohol-related hospital admissions and 714 fewer deaths per year after ten years. Do you agree that this minimum unit price level would achieve these aims? Please select one option.

*No Response*

Score

0

Q10. Should other factors or evidence be considered when setting a minimum unit price for alcohol? Please select one option.

*No Response*

Score

0

Q11. The government wishes to maintain the effectiveness of minimum unit

pricing and is therefore proposing to adjust the minimum unit price level over time. How do you think the level of minimum unit price set by the government should be adjusted over time? Please select one option.

*No Response*

Score

0

Q12. 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.

*No Response*

Score

0

Page Score

0

## **Page 4: A ban on multi-buy promotions in the off-trade**

Q13. The government is consulting on introducing a ban on multi-buy promotions in the off-trade (e.g. shops and off-licences) as part of its wider strategy to reduce excessive alcohol consumption, and alongside the introduction of a minimum unit price. A ban on multi-buy promotions would therefore not apply to pubs, clubs, bars or restaurants. The term 'multi-buy promotions' refers to alcohol promotions that offer a discount for buying multiple items. 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. As well as being part of a wider strategy to reduce consumption and tackle irresponsible alcohol sales, a ban on multi-buy promotions would also contribute to the government's aim of encouraging people to be aware of how much they drink and the risks of excessive drinking, so that they can make informed choices. The aim of this consultation is to assess support for such a ban and contribute to our understanding of the impact a ban on multi-buy promotions may have. The types of promotion it is proposed that a ban would include, are: two for the price of one, three for the price of two, buy one get one free, buy six and get 20 per cent off, 24 cans of lager costing less than 24 times the cost of a single 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, 3 for £10 where each bottle costs more than £3.33. More information is available in the full consultation document and the impact assessment. Do you want to answer questions on a ban on multi-buy promotions in the off-trade? Please select one option.

Yes

Score

0

Page Score

0

## Page 5: A ban on multi-buy promotions in the off-trade

Q14. Do you think there should be a ban on multi-buy promotions involving alcohol in the off-trade? Please select one option.

*No Response*

Score

0

Q15. Are there any further offers which should be included in a ban on multi-buy promotions? Please select one option.

*No Response*

Score

0

Q16. Should other factors or evidence be taken into account when considering a ban on multi-buy promotions? Please select one option.

*No Response*

Score

0

Q17. 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.

*No Response*

Score

0

Page Score

0

## Page 6: Reviewing the mandatory licensing conditions

Q18. 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 alcohol 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. The government has also committed to consult on whether these mandatory licensing conditions should, where relevant, apply to both the on- and off-trade. This consultation forms part of that review, and will contribute to the government's understanding of how these mandatory conditions are perceived. The five mandatory licensing conditions currently set out in regulations in relation to the supply of alcohol are: a ban on irresponsible promotionsa ban on dispensing alcohol by one person directly into the mouth of anothera requirement to provide free tap water on request to

customers a requirement to have an age verification policy to prevent the sale of alcohol to persons under 18 years of age, and a requirement to make available to customers small measures such as half pints or beer or cider or 125ml glasses of wine. More information is available in the full consultation document. An explanation of each of these terms can be found on page 20 of the consultation document, in the glossary at the end. Do you want to answer questions on reviewing the mandatory licensing conditions? Please select one option.

Yes

Score

0

Page Score

0

## Page 7: Reviewing the mandatory licensing conditions

Q19. Do you think each of the mandatory licensing conditions is effective in promoting the licensing objectives? For more information on the licensing objectives please see the glossary at the end of the full consultation document. Please select one option (Yes, No, Don't know) from each drop down menu.

*No Response*

Score

0

Q20. Do you think that the mandatory licensing conditions do enough to target irresponsible promotions in pubs and clubs? Please select one option.

*No Response*

Score

0

Q21. Are there other issues related to the licensing objectives which could be tackled through a mandatory licensing condition? Please select one option.

*No Response*

Score

0

Q22. Do you think that 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.

*No Response*

Score

0

Page Score

0

## Page 8: Health as a licensing objective for cumulative impact policies

Q23. We want to ensure that licensing authorities are able to take alcohol-related health harms into consideration when making decisions about cumulative impact policies (CIPs) which can be used to manage problems linked to the density of premises in specific areas. 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. We are proposing 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. We expect that those areas with the highest levels of alcohol-related health harm, or fast rising levels of harm from alcohol, will be most likely to use this power. It 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. More information is available in the full consultation document and impact assessment. Do you want to answer questions on health as a licensing objective for cumulative impact policies? Please select one option.

Yes

Score

0

Page Score

0

## Page 9: Health as a licensing objective for cumulative impact policies

Q24. 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):

*No Response*

Q25. 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.

*No Response*

Score

0

Q26. 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 your answer in the box below, providing evidence to support your response (keeping your views to a maximum of 200 words):

*No Response*

Page Score

0

## Page 10: Freeing up responsible businesses

Q27. The government has committed to consult on giving licensing authorities greater freedom to take decisions that reflect the needs of their local community. Following the government's Red Tape Challenge in 2011, three areas of reform were specified: alcohol licensing for certain types of premises providing minimal alcohol sales, temporary event notices (TENs) and the licensing of late night refreshment. This section asks for views on these proposals and suggests further ways to reduce burdens on business. The proposals set out here can be seen alongside work undertaken by the Department for Culture, Media and Sport to remove unnecessary red tape from regulated entertainment. More information on each of these areas for reform is available in the full consultation document. There are five subjects covered in this section. They are: ancillary sales of alcohol occasional provision of licensable activities at community events an extension of the temporary event notice limit at individual premises late night refreshment, and further proposals to reduce burdens on business Do you want to answer questions on freeing up responsible businesses? Please select one option.

Yes

Score

0

Page Score

0

## Page 11: Freeing up responsible businesses

Q28. Ancillary sales of alcohol For many businesses, the sale of alcohol is only a small part of, or incidental to, their wider activities, and occurs alongside the provision of another product or service (which this consultation refers to as an 'ancillary sale'). For example, a guesthouse might wish to provide wine to its guests with an evening meal or a complimentary bottle of wine in a guest's room, while a hairdresser might wish to offer clients a glass of wine. 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.

*No Response*

Score

0

Q29. If special provisions 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.

*No Response*

Score

0

Q30. 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 suggestions in the box below, keeping your views to a maximum of 200 words:

*No Response*

Q31. 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. Alternatively, a second option is to broaden the definition of 'ancillary sales' to include all businesses (and/or not for profit activities) through the use of a general set of qualification criteria, for example, to the effect that: alcohol must be sold or supplied as a small part or proportion of a sales transaction or contract for a wider service, and the amount of alcohol that could be supplied as part of that contract cannot exceed a prescribed amount. Do you think that the qualification criteria proposed meet this aim?

*No Response*

Score

0

Q32. Do you think that these proposals would significantly reduce the burdens on ancillary sellers? Please select one option in each row.

*No Response*

Score

0

Q33. Do you think these proposals would impact adversely on one or more of the licensing objectives? Please select one option.

*No Response*

Score

0

Q34. 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 response to a maximum of 200 words:

*No Response*

Page Score

0

## **Page 12: Freeing up responsible businesses**

Q35. 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.

*No Response*

Score

0

Q36. What impact do you think a locally determined notification would have on organisers of community events? Please select one option in each row.

*No Response*

Score

0

Page Score

0

## **Page 13: Freeing up responsible businesses**

Q37. Should the number of TENs which can be given in respect of individual premises be increased? Please select one option.

*No Response*

Score

0

Q38. If you answered yes, please select one option to indicate which you would prefer. Please select one option.

*No Response*

Score

0

Page Score

0

## **Page 14: Freeing up responsible businesses**

Q39. 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.

*No Response*

Score

0

Q40. 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.

*No Response*

Score

0

Q41. 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).

*No Response*

Page Score

0

## **Page 15: Freeing up responsible businesses**

Q42. Do you agree with each of the following proposals? Please select one option in each row.

*No Response*

Score

0

Q43. Do you think that each of the following would reduce the overall burdens on business? Please select one option in each row.

*No Response*

Score

0

Q44. 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.

*No Response*

Score

0

Q45. 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 keep your views to a maximum of 200 words.)

*No Response*

Page Score

0

## Page 16: Impact assessments

Q46. Impact assessments for the proposals in this consultation have been published alongside the full consultation document. 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.

*No Response*

Score

0

Q47. Do you have any comments on the methodologies or assumptions used in the impact assessments? If yes, please specify in the box below, clearly referencing the impact assessment and page to which you refer (keeping your views to a maximum of 400 words).

*No Response*

Page Score

0

## Scoring Summary

Pages	Total
1. About you	0
2. A minimum unit price for alcohol	0
3. A minimum unit price for alcohol	0
4. A ban on multi-buy promotions in the off-trade	0

5. A ban on multi-buy promotions in the off-trade	0
6. Reviewing the mandatory licensing conditions	0
7. Reviewing the mandatory licensing conditions	0
8. Health as a licensing objective for cumulative impact policies	0
9. Health as a licensing objective for cumulative impact policies	0
10. Freeing up responsible businesses	0
11. Freeing up responsible businesses	0
12. Freeing up responsible businesses	0
13. Freeing up responsible businesses	0
14. Freeing up responsible businesses	0
15. Freeing up responsible businesses	0
16. Impact assessments	0
<b>Total Survey Score:</b>	<b>0</b>

# Alcohol strategy consultation

User Details - 5412638

**Date Started:** 28/01/2013 12:09:30      **Date Ended:** 05/02/2013 08:59:00

**Time taken:** 188 hrs, 49 mins, 30 secs   **IP Address:** n/a

**Unique ID:** n/a

## Page 1: About you

Q1. Please select if you would like your response or personal details to be treated as confidential.

**No Response**

Score

0

Q2. Which of the following best describes you or the professional interest you represent? Please select one option from the menu below.

Public health body (eg Primary Care Trust, Local Health Board, Director of Public Health)

***Please specify which organisation, licensing authority or police force you represent in the box below:***

NHS ELC - Public health Newham

Score

0

Q3. If you are responding on behalf of an organisation or interest group, please write in the box below the number of members in your group or organisation.

25

Q4. How did you obtain the views of your members? Please explain in the box below keeping your response to a maximum of 100 words.

Consultation and meetings to form and agree a response with council officers and Public Health specialists

Q5. Please indicate in which region you or your organisation is based.

Please select one option from the menu below.

London

Score

0

Q6. If you are responding as a member of the public, what is your gender?

Please select one option.

**No Response**

Score

0

Q7. If you are responding as a member of the public, what is your age?  
Please select one option.

**No Response**

Score

0

Page Score

0

## Page 2: A minimum unit price for alcohol

Q8. In the alcohol strategy, the government committed to introducing a minimum unit price for alcohol in England and Wales. This consultation will contribute to the debate on the most appropriate price per unit and the mechanism by which, once set, minimum unit pricing would remain effective. It is also an opportunity for interested parties to raise other issues around minimum unit pricing. The purpose of minimum unit pricing is to reduce alcohol consumption, particularly by the most hazardous and harmful drinkers who tend to show a preference for the cheapest alcohol products. By doing so the government estimates there will be a reduction in the associated crime and health harms, especially the numbers of hospital admissions, alcohol-related deaths and alcohol-related crimes. Minimum unit pricing is not intended disproportionately to affect responsible drinkers or particular social groups but to reduce the availability of alcohol sold at very low or heavily discounted prices. More information (including the definitions of hazardous and harmful drinkers) is available in the full consultation document and the impact assessment. Do you want to answer questions on minimum unit pricing? Please select one option.

Yes

Score

0

Page Score

0

## Page 3: A minimum unit price for alcohol

Q9. The impact of minimum unit pricing will depend on the price per unit of alcohol. The government wants to ensure that the chosen price level is targeted and proportionate, whilst achieving a significant reduction of harm. The government is therefore consulting on the introduction of a recommended minimum unit price of 45p. The government estimates a reduction in consumption across all product types of 3.3 per cent, a reduction in crime of 5,240 per year, a reduction in 24,600 alcohol-related hospital admissions and 714 fewer deaths per year after ten years. Do you agree that this minimum unit price level would achieve these aims? Please select one option.

Yes

***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):***

A higher MUP of 50p has been shown in recent research from Canada and elsewhere to be more effective in addressing alcohol related harms. There is a Focus on high strength alcohol sales which is laudable but does not address mid strength and medium priced sales and their significant role in both health and public order issues. ( ie not all health and crime issues stem from super strength lagers) significant harm and potential for crime reduction and public disorder. There are already significant tools available with regards to licensing objectives eg crime and disorder and local approaches and tools are available to gain same outcomes. Overall this is helpful but should be set at the 50p level to maximise impact and achieve parity with Scotland to avoid cross border “booze cruise” import export issues.

Score

0

Q10. Should other factors or evidence be considered when setting a minimum unit price for alcohol? Please select one option.

Yes

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

The evidence presented does contain a wide range but does not reference much available work on the impact of alcohol on DV and ( see the home office strategy on VAWG) and the many other evidence sources including Modelling to assess the effectiveness and cost-effectiveness of public health related strategies and interventions to reduce alcohol attributable harm in England using the Sheffield Alcohol Policy Model version 2.0.

Purshouse, R et al. Report to the NICE Public Health Programme Development Group 2009. Model based appraisal of Alcohol Minimum Pricing and Off Licensed Trade Discount Bans in Scotland using the Sheffield Alcohol Policy Model v2 – Second Update, Sheffield. University of Sheffield 2012, ‘Does minimum pricing reduce alcohol consumption? The experience of a Canadian province’, Addiction, vol. 107, issue 5. Stockwell, T. et al. 2012,

Score

0

Q11. The government wishes to maintain the effectiveness of minimum unit pricing and is therefore proposing to adjust the minimum unit price level over time. 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 automatically be updated in line with inflation each year

Score

0

Q12. 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

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

There will be an impact on SME involved in retail off sales. There is a potential to significantly impact on their viability There is an impact on local trading and licensing officers who do not have signification manpower to deliver enforcement operations to police them. There is a potential significant benefit for children and young people who face significant impacts related to alcohol abuse and related violence and comparable harms.

Score

0

Page Score

0

## **Page 4: A ban on multi-buy promotions in the off-trade**

Q13. The government is consulting on introducing a ban on multi-buy promotions in the off-trade (e.g. shops and off-licences) as part of its wider strategy to reduce excessive alcohol consumption, and alongside the introduction of a minimum unit price. A ban on multi-buy promotions would therefore not apply to pubs, clubs, bars or restaurants. The term 'multi-buy promotions' refers to alcohol promotions that offer a discount for buying multiple items. 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. As well as being part of a wider strategy to reduce consumption and tackle irresponsible alcohol sales, a ban on multi-buy promotions would also contribute to the government's aim of encouraging people to be aware of how much they drink and the risks of excessive drinking, so that they can make informed choices. The aim of this consultation is to assess support for such a ban and contribute to our understanding of the impact a ban on multi-buy promotions may have. The types of promotion it is proposed that a ban would include, are: two for the price of one, three for the price of two, buy one get one free, buy six and get 20 per cent off, 24 cans of lager costing less than 24 times the cost of a single 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, 3 for £10 where each bottle costs more than £3.33. More information is available in the full consultation document and the impact assessment. Do you want to answer questions on a ban on multi-buy promotions in the off-trade? Please select one option.

Yes

Score

0

Page Score

0

## Page 5: A ban on multi-buy promotions in the off-trade

Q14. Do you think there should be a ban on multi-buy promotions involving alcohol in the off-trade? Please select one option.

Yes

Score

0

Q15. Are there any further offers which should be included in a ban on multi-buy promotions? Please select one option.

Yes

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

Spirits are not currently included in these offers and they clearly need to be. There are too many ways in which major retailers can circumvent the alcohol MUPs in the existing promotions. Large discount volume sales have a significant health and social impact and should be more rigorously tackled.

Score

0

Q16. Should other factors or evidence be taken into account when considering a ban on multi-buy promotions? Please select one option.

Yes

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

See above for MUP related evidence covering this agenda

Score

0

Q17. 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

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

There are significant impacts on cash and carries who sell to small local retailers and as mentioned above the SMEs doing high street sales. This is a good thing as there will be significant impacts on local crime and disorder.

Score

0

Page Score

0

## Page 6: Reviewing the mandatory licensing

## conditions

Q18. 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 alcohol 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. The government has also committed to consult on whether these mandatory licensing conditions should, where relevant, apply to both the on- and off-trade. This consultation forms part of that review, and will contribute to the government's understanding of how these mandatory conditions are perceived. The five mandatory licensing conditions currently set out in regulations in relation to the supply of alcohol are: a ban on irresponsible promotions, a ban on dispensing alcohol by one person directly into the mouth of another, a requirement to provide free tap water on request to customers, a requirement to have an age verification policy to prevent the sale of alcohol to persons under 18 years of age, and a requirement to make available to customers small measures such as half pints of beer or cider or 125ml glasses of wine. More information is available in the full consultation document. An explanation of each of these terms can be found on page 20 of the consultation document, in the glossary at the end. Do you want to answer questions on reviewing the mandatory licensing conditions? Please select one option.

Yes

Score

0

Page Score

0

## Page 7: Reviewing the mandatory licensing conditions

Q19. Do you think each of the mandatory licensing conditions is effective in promoting the licensing objectives? For more information on the licensing objectives please see the glossary at the end of the full consultation document. Please select one option (Yes, No, Don't know) from each drop down menu.

	<b>Prevention of crime and disorder</b>	<b>Public safety</b>	<b>Prevention of public nuisance</b>	<b>Protection of children from harm</b>
<b>Irresponsible promotions</b>	Yes	Yes	Yes	Yes
<b>Dispensing alcohol directly into the mouth</b>	Yes	Yes	Yes	Yes

<b>Mandatory provision of free tap water</b>	Yes	Yes	Yes	Yes
<b>Age verification policy</b>	Yes	Yes	Yes	Yes
<b>Mandatory provision of small measures</b>	Yes	Yes	Yes	Yes

Score

0

Q20. Do you think that the mandatory licensing conditions do enough to target irresponsible promotions in pubs and clubs? Please select one option.

Yes

Score

0

Q21. Are there other issues related to the licensing objectives which could be tackled through a mandatory licensing condition? Please select one option.

Yes

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

The overall impacts of harmful alcohol consumption need to be taken into account, including impacts on mental health, chronic and long term conditions, premature morbidity and mortality can all be significantly impacted upon by tighter licensing conditions.

Score

0

Q22. Do you think that 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.

No

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

There needs to be more tackling of irresponsible and harmful alcohol sales promotions.

Score

0

Page Score

0

## Page 8: Health as a licensing objective for cumulative impact policies

Q23. We want to ensure that licensing authorities are able to take alcohol-

related health harms into consideration when making decisions about cumulative impact policies (CIPs) which can be used to manage problems linked to the density of premises in specific areas. 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. We are proposing 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. We expect that those areas with the highest levels of alcohol-related health harm, or fast rising levels of harm from alcohol, will be most likely to use this power. It 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. More information is available in the full consultation document and impact assessment. Do you want to answer questions on health as a licensing objective for cumulative impact policies? Please select one option.

Yes

Score

0

Page Score

0

## Page 9: Health as a licensing objective for cumulative impact policies

Q24. 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):

- Data on accidents relating to alcohol in a specific location
- Data on injuries or primary care/A & E presentations eg DV associated with alcohol
- Data on police and ambulance call outs – relating mental health /fear of crime
- Data relating to mental health and well being /fear of crime
- Data on safeguarding where alcohol impacts are recorded and contributory to “hidden harm” etc
- Data on Alcohol assaults with regards to VAWG
- Data on Alcohol as a contributory factor in Child sexual exploitation and gang related violence and sexual exploitation
- Data on lone drinking impacts on elderly mental health and enablement, social connectivity etc
- Mortality related data giving a nuanced presentation of alcohol as a

contributor in early morbidity and mortality

Q25. 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

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

Currently the CIP is focussed on crime and disorder education and does not explicitly embrace public health and substance misuse wider agendas such as the Public Health Outcomes framework. In terms of the cumulative impact - It is still unclear what evidence is proposed to be taken into consideration (possibilities already included in the response above) and also how will such evidence be connected to location, for both sales and consumption. Although it is a proposal could potentially have a very positive impact, its application seems unclear at the moment. The problem with a proposal that mentions cumulative impact is twofold: 1. You would need evidence in terms of the amount of licensed alcohol premises within an area – very hard to do and keep current etc 2. We would have to define what is acceptable or not in terms of the amount of licensed alcohol premises within an area and justify why the level has been defined as such.

Score

0

Q26. 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 your answer in the box below, providing evidence to support your response (keeping your views to a maximum of 200 words):

This will add detail to the overall picture of local need and trends and reinforce need for refreshed local CIP, and support prevention programmes with much needed and refreshed evidence.

Data will be collected and utilised to ensure a location focus (police data is currently on a premises basis) and will only look at individual premises when looking at new licensing, shifting the emphasis towards a population perspective rather than individual premise focus. This will allow for a wider impact assessment for an area rather than a piecemeal premises focussed approach.

Page Score

0

## **Page 10: Freeing up responsible businesses**

Q27. The government has committed to consult on giving licensing authorities greater freedom to take decisions that reflect the needs of their local community. Following the government's Red Tape Challenge in 2011, three areas of reform were specified: alcohol licensing for certain types of premises providing minimal alcohol sales, temporary event notices (TENs)

and the licensing of late night refreshment. This section asks for views on these proposals and suggests further ways to reduce burdens on business. The proposals set out here can be seen alongside work undertaken by the Department for Culture, Media and Sport to remove unnecessary red tape from regulated entertainment. More information on each of these areas for reform is available in the full consultation document. There are five subjects covered in this section. They are: ancillary sales of alcohol, occasional provision of licensable activities at community events, an extension of the temporary event notice limit at individual premises, late night refreshment, and further proposals to reduce burdens on business. Do you want to answer questions on freeing up responsible businesses? Please select one option.

Yes

Score

0

Page Score

0

## Page 11: Freeing up responsible businesses

Q28. Ancillary sales of alcohol For many businesses, the sale of alcohol is only a small part of, or incidental to, their wider activities, and occurs alongside the provision of another product or service (which this consultation refers to as an 'ancillary sale'). For example, a guesthouse might wish to provide wine to its guests with an evening meal or a complimentary bottle of wine in a guest's room, while a hairdresser might wish to offer clients a glass of wine. 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
<b>The provision should be limited to a specific list of certain types of business and the kinds of sales they make</b>		X	
<b>The provision should be available to all businesses providing they meet certain qualification criteria to be an ancillary seller</b>		X	
<b>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 the above options</b>		X	

Score

0

Q29. If special provisions 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.

	Yes	No	Don't know
<b>Accommodation providers, providing alcohol alongside accommodation as part of the contract</b>		X	
<b>Hair and beauty salons, providing alcohol alongside a hair or beauty treatment</b>		X	
<b>Florists, providing alcohol alongside the purchase of flowers</b>		X	
<b>Cultural organisations, such as theatres, cinemas and museums, providing alcohol alongside cultural events as part of the entry ticket</b>		X	
<b>Regular charitable events, providing alcohol as part of the wider occasion</b>		X	

Score

0

Q30. 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 suggestions in the box below, keeping your views to a maximum of 200 words:

There needs to be a policy of one license for ( as an example) a hotel, not one for each mini bar or the requirement for an extra license if someone buys alcohol in bar and takes it to their room.

Q31. 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. Alternatively, a second option is to broaden the definition of 'ancillary sales' to include all businesses (and/or not for profit activities) through the use of a general set of qualification criteria, for example, to the effect that: alcohol must be sold or supplied as a small part or proportion of a sales transaction or contract for a wider service, and the amount of alcohol that could be supplied as part of that contract cannot exceed a prescribed amount Do you think that the qualification criteria proposed meet this aim?

No

***Please use the space below to provide further comments (keeping your views to a maximum of 200 words):***

This would be difficult if not impossible to enforce.

Score

0

Q32. 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
<b>Allow premises making ancillary sales to request in their premises licence application that the requirement for a personal licence holder be removed</b>		X	
<b>Introduce a new, light-touch form of authorisation for premises making ancillary sales - an ASN but retaining the need for a personal licence holder</b>		X	
<b>Introduce a new, light touch form of authorisation for premises making ancillary sales - an ASN - with no requirement for a personal licence holder</b>		X	

Score

0

Q33. Do you think these proposals would impact adversely on one or more of the licensing objectives? Please select one option.

	Yes	No	Don't know
<b>Allow premises making ancillary sales to request in their premises licence application that the requirement for a personal licence holder be removed</b>	X		
<b>Introduce a new, light-touch form of authorisation for premises making ancillary sales - an ASN but retaining the need for a personal licence holder</b>	X		
<b>Introduce a new, light touch form of authorisation for premises making ancillary sales - an ASN - with no requirement for a personal licence holder</b>	X		

Score

0

Q34. 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 response to a maximum of 200 words:

The adoption of a lighter touch to licensing in densely populated urban areas is misinformed and likely to have significant negative impacts on health and public order issues.

Page Score

0

## Page 12: Freeing up responsible businesses

Q35. 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

Score

0

Q36. 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
Reduce the burden	X		
Increase the burden		X	

Score

0

Page Score

0

## Page 13: Freeing up responsible businesses

Q37. Should the number of TENs which can be given in respect of individual premises be increased? Please select one option.

No

Score

0

Q38. If you answered yes, please select one option to indicate which you would prefer. Please select one option.

*No Response*

Score

0

Page Score

0

## Page 14: Freeing up responsible businesses

Q39. 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
Determining that premises in certain areas are exempt		X	

<b>Determining that certain premises types are exempt in their local area</b>		X	
---	--	---	--

Score

0

Q40. 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.

No

Score

0

Q41. 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).

**No Response**

Page Score

0

## Page 15: Freeing up responsible businesses

Q42. Do you agree with each of the following proposals? Please select one option in each row.

	Yes	No	Don't know
<b>Remove requirements to advertise licensing applications in local newspapers</b>		X	
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs for the on and off-trade</b>		X	
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs, but only in respect of overnight accommodation - lodges</b>			X
<b>Remove or simplify requirements to renew personal licences under the 2003 Act</b>		X	

Score

0

Q43. 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
<b>Remove requirements to advertise licensing applications in local newspapers</b>	X		
<b>Remove the centrally imposed prohibition on the</b>	X		

<b>sale of alcohol at MSAs for the on and off-trade</b>			
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs, but only in respect of overnight accommodation - lodges</b>	X		
<b>Remove or simplify requirements to renew personal licences under the 2003 Act</b>	X		

Score

0

Q44. 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.

	Yes	No	Don't know
<b>Remove requirements to advertise licensing applications in local newspapers</b>	X		
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs for the on and off-trade</b>	X		
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs, but only in respect of overnight accommodation - lodges</b>	X		
<b>Remove or simplify requirements to renew personal licences under the 2003 Act</b>	X		

Score

0

Q45. 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 keep your views to a maximum of 200 words.)

none

Page Score

0

## Page 16: Impact assessments

Q46. Impact assessments for the proposals in this consultation have been published alongside the full consultation document. 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
Minimum unit pricing	X		
Multi-buy promotions	X		
Health as a licensing objective for cumulative impact		X	
Ancillary sales of alcohol	X		
Temporary event notices		X	
Late night refreshment		X	
Removing the duty to advertise licence applications in a local newspaper		X	
Sales of alcohol at motorway service stations		X	
Personal licences		X	

Score

0

Q47. Do you have any comments on the methodologies or assumptions used in the impact assessments? If yes, please specify in the box below, clearly referencing the impact assessment and page to which you refer (keeping your views to a maximum of 400 words).

*No Response*

Page Score

0

## Scoring Summary

Pages	Total
1. About you	0
2. A minimum unit price for alcohol	0
3. A minimum unit price for alcohol	0
4. A ban on multi-buy promotions in the off-trade	0
5. A ban on multi-buy promotions in the off-trade	0

6. Reviewing the mandatory licensing conditions	0
7. Reviewing the mandatory licensing conditions	0
8. Health as a licensing objective for cumulative impact policies	0
9. Health as a licensing objective for cumulative impact policies	0
10. Freeing up responsible businesses	0
11. Freeing up responsible businesses	0
12. Freeing up responsible businesses	0
13. Freeing up responsible businesses	0
14. Freeing up responsible businesses	0
15. Freeing up responsible businesses	0
16. Impact assessments	0
<b>Total Survey Score:</b>	0

# Alcohol strategy consultation

---

User Details - 5460462

**Date Started:** 05/02/2013 07:24:36    **Date Ended:** 05/02/2013 09:01:41

**Time taken:** 1 hr, 37 mins, 5 secs    **IP Address:** n/a

**Unique ID:** n/a

---

## Page 1: About you

Q1. Please select if you would like your response or personal details to be treated as confidential.

*No Response*

Score

0

Q2. Which of the following best describes you or the professional interest you represent? Please select one option from the menu below.

Licensing authority

***Please specify which organisation, licensing authority or police force you represent in the box below:***

Tameside Metropolitan Borough Council

Score

0

Q3. If you are responding on behalf of an organisation or interest group, please write in the box below the number of members in your group or organisation.

*No Response*

Q4. How did you obtain the views of your members? Please explain in the box below keeping your response to a maximum of 100 words.

*No Response*

Q5. Please indicate in which region you or your organisation is based.

Please select one option from the menu below.

North West England

Score

0

Q6. If you are responding as a member of the public, what is your gender? Please select one option.

*No Response*

Score

0

Q7. If you are responding as a member of the public, what is your age? Please select one option.

No Response

Score

0

Page Score

0

## Page 2: A minimum unit price for alcohol

Q8. In the alcohol strategy, the government committed to introducing a minimum unit price for alcohol in England and Wales. This consultation will contribute to the debate on the most appropriate price per unit and the mechanism by which, once set, minimum unit pricing would remain effective. It is also an opportunity for interested parties to raise other issues around minimum unit pricing. The purpose of minimum unit pricing is to reduce alcohol consumption, particularly by the most hazardous and harmful drinkers who tend to show a preference for the cheapest alcohol products. By doing so the government estimates there will be a reduction in the associated crime and health harms, especially the numbers of hospital admissions, alcohol-related deaths and alcohol-related crimes. Minimum unit pricing is not intended disproportionately to affect responsible drinkers or particular social groups but to reduce the availability of alcohol sold at very low or heavily discounted prices. More information (including the definitions of hazardous and harmful drinkers) is available in the full consultation document and the impact assessment. Do you want to answer questions on minimum unit pricing? Please select one option.

Yes

Score

0

Page Score

0

## Page 3: A minimum unit price for alcohol

Q9. The impact of minimum unit pricing will depend on the price per unit of alcohol. The government wants to ensure that the chosen price level is targeted and proportionate, whilst achieving a significant reduction of harm. The government is therefore consulting on the introduction of a recommended minimum unit price of 45p. The government estimates a reduction in consumption across all product types of 3.3 per cent, a reduction in crime of 5,240 per year, a reduction in 24,600 alcohol-related hospital admissions and 714 fewer deaths per year after ten years. Do you agree that this minimum unit price level would achieve these aims? Please select one option.

Yes

***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):***

Tameside Council supports the proposal for a minimum unit price of 50p per unit

Score

0

Q10. Should other factors or evidence be considered when setting a minimum unit price for alcohol? Please select one option.

No

Score

0

Q11. The government wishes to maintain the effectiveness of minimum unit pricing and is therefore proposing to adjust the minimum unit price level over time. 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

Score

0

Q12. 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

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

The on-trade could see an improvement in business as their prices, on the whole, will not be affected by the MUP. There could potentially be an increase in sales of illegal and illicit (counterfeit or duty-evaded) alcohol.

Score

0

Page Score

0

## **Page 4: A ban on multi-buy promotions in the off-trade**

Q13. The government is consulting on introducing a ban on multi-buy promotions in the off-trade (e.g. shops and off-licences) as part of its wider strategy to reduce excessive alcohol consumption, and alongside the introduction of a minimum unit price. A ban on multi-buy promotions would therefore not apply to pubs, clubs, bars or restaurants. The term 'multi-buy promotions' refers to alcohol promotions that offer a discount for buying multiple items. 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. As well as being part of a wider strategy to reduce consumption and tackle irresponsible alcohol sales, a ban on multi-buy promotions would also contribute to the government's aim of encouraging people to be aware of how much they drink and the risks of excessive drinking, so that they can make informed choices. The aim of this

consultation is to assess support for such a ban and contribute to our understanding of the impact a ban on multi-buy promotions may have. The types of promotion it is proposed that a ban would include, are: two for the price of one, three for the price of two, buy one get one free, buy six and get 20 per cent off, 24 cans of lager costing less than 24 times the cost of a single 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, 3 for £10 where each bottle costs more than £3.33. More information is available in the full consultation document and the impact assessment. Do you want to answer questions on a ban on multi-buy promotions in the off-trade? Please select one option.

Yes

Score

0

Page Score

0

## Page 5: A ban on multi-buy promotions in the off-trade

Q14. Do you think there should be a ban on multi-buy promotions involving alcohol in the off-trade? Please select one option.

Yes

Score

0

Q15. Are there any further offers which should be included in a ban on multi-buy promotions? Please select one option.

Yes

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

The current proposals do not go far enough - they will be easy for retailers to circumvent and extremely difficult to enforce. A better course of action would be to ban all discounting of alcohol. This would be much easier to understand and to regulate.

Score

0

Q16. Should other factors or evidence be taken into account when considering a ban on multi-buy promotions? Please select one option.

Yes

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

Some careful thought should be given as to how such a ban should be regulated & by whom. This could potentially create a large amount of work for local authority regulators at a time when resources have been drastically reduced.

Score

0

Q17. 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

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

The on-trade could benefit from an increase in trade as a ban on multi-buy promotions would reduce the larger retailer's price advantage.

Score

0

Page Score

0

## Page 6: Reviewing the mandatory licensing conditions

Q18. 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 alcohol 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. The government has also committed to consult on whether these mandatory licensing conditions should, where relevant, apply to both the on- and off-trade. This consultation forms part of that review, and will contribute to the government's understanding of how these mandatory conditions are perceived. The five mandatory licensing conditions currently set out in regulations in relation to the supply of alcohol are: a ban on irresponsible promotionsa ban on dispensing alcohol by one person directly into the mouth of anothera requirement to provide free tap water on request to customersa requirement to have an age verification policy to prevent the sale of alcohol to persons under 18 years of age, anda requirement to make available to customers small measures such as half pints or beer or cider or 125ml glasses of wine More information is available in the full consultation document. An explanation of each of these terms can be found on page 20 of the consultation document, in the glossary at the end. Do you want to answer questions on reviewing the mandatory licensing conditions? Please select one option.

Yes

Score

0

Page Score

0

## Page 7: Reviewing the mandatory licensing conditions

Q19. Do you think each of the mandatory licensing conditions is effective in

promoting the licensing objectives? For more information on the licensing objectives please see the glossary at the end of the full consultation document. Please select one option (Yes, No, Don't know) from each drop down menu.

	<b>Prevention of crime and disorder</b>	<b>Public safety</b>	<b>Prevention of public nuisance</b>	<b>Protection of children from harm</b>
<b>Irresponsible promotions</b>	Yes	Yes	Yes	No
<b>Dispensing alcohol directly into the mouth</b>	Yes	Yes	Don't know	No
<b>Mandatory provision of free tap water</b>	No	Yes	No	No
<b>Age verification policy</b>	No	No	No	No
<b>Mandatory provision of small measures</b>	No	Yes	No	No

Score

0

Q20. Do you think that the mandatory licensing conditions do enough to target irresponsible promotions in pubs and clubs? Please select one option.

Yes

Score

0

Q21. Are there other issues related to the licensing objectives which could be tackled through a mandatory licensing condition? Please select one option.

Yes

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

The age verification policy condition should be tightened to a mandatory challenge 25 condition. Challenge 25 does not prevent any alcohol sales to anyone over 18, but it is a much easier policy to implement and makes it much more straightforward for members of staff to decide who to ask for I.D. It is the view of Tameside MBC that a mandatory challenge 25 condition, including mandatory signage and staff training would be a huge step forward in promoting the protection of children from harm.

Score

0

Q22. Do you think that 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.

No

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

Mandatory conditions should apply to on and off premises wherever appropriate.

Score

0

Page Score

0

## **Page 8: Health as a licensing objective for cumulative impact policies**

Q23. We want to ensure that licensing authorities are able to take alcohol-related health harms into consideration when making decisions about cumulative impact policies (CIPs) which can be used to manage problems linked to the density of premises in specific areas. 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. We are proposing 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. We expect that those areas with the highest levels of alcohol-related health harm, or fast rising levels of harm from alcohol, will be most likely to use this power. It 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. More information is available in the full consultation document and impact assessment. Do you want to answer questions on health as a licensing objective for cumulative impact policies? Please select one option.

Yes

Score

0

Page Score

0

## **Page 9: Health as a licensing objective for cumulative impact policies**

Q24. 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):

Data from:

Hospitals

A&E departments

Ambulance services

GPs

Police

Fire Service

Q25. 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.

No

Score

0

Q26. 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 your answer in the box below, providing evidence to support your response (keeping your views to a maximum of 200 words):

The biggest problem is how such a policy would be implemented once it has been put in place. The proposal seems to allow health considerations to be taken into account only in respect of the decision to introduce a CIP. After that, responsible authorities could only revert to the four existing licensing objectives to object to a new application within a CIP zone. To be effective, the proposed introduction of health as a licensing objective should be expanded to allow health bodies to make representations against individual applications on the grounds of public health if a CIP is in place.

Page Score

0

## Page 10: Freeing up responsible businesses

Q27. The government has committed to consult on giving licensing authorities greater freedom to take decisions that reflect the needs of their local community. Following the government's Red Tape Challenge in 2011, three areas of reform were specified: alcohol licensing for certain types of premises providing minimal alcohol sales, temporary event notices (TENs) and the licensing of late night refreshment. This section asks for views on these proposals and suggests further ways to reduce burdens on business. The proposals set out here can be seen alongside work undertaken by the Department for Culture, Media and Sport to remove unnecessary red tape from regulated entertainment. More information on each of these areas for reform is available in the full consultation document. There are five subjects covered in this section. They are: ancillary sales of alcohol occasional

provision of licensable activities at community eventsan extension of the temporary event notice limit at individual premiseslate night refreshment, andfurther proposals to reduce burdens on business Do you want to answer questions on freeing up responsible businesses? Please select one option.

Yes

Score

0

Page Score

0

## Page 11: Freeing up responsible businesses

Q28. Ancillary sales of alcohol For many businesses, the sale of alcohol is only a small part of, or incidental to, their wider activities, and occurs alongside the provision of another product or service (which this consultation refers to as an 'ancillary sale'). For example, a guesthouse might wish to provide wine to its guests with an evening meal or a complimentary bottle of wine in a guest's room, while a hairdresser might wish to offer clients a glass of wine. 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
<b>The provision should be limited to a specific list of certain types of business and the kinds of sales they make</b>		X	
<b>The provision should be available to all businesses providing they meet certain qualification criteria to be an ancillary seller</b>		X	
<b>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 the above options</b>		X	

Score

0

Q29. If special provisions 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.

	Yes	No	Don't know
<b>Accommodation providers providing alcohol</b>		X	

<b>alongside accommodation as part of the contract</b>			
<b>Hair and beauty salons, providing alcohol alongside a hair or beauty treatment</b>		X	
<b>Florists, providing alcohol alongside the purchase of flowers</b>		X	
<b>Cultural organisations, such as theatres, cinemas and museums, providing alcohol alongside cultural events as part of the entry ticket</b>		X	
<b>Regular charitable events, providing alcohol as part of the wider occasion</b>		X	

Score

0

Q30. 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 suggestions in the box below, keeping your views to a maximum of 200 words:

Tameside MBC does not support any suggested relaxation in the current licensing legislation. Any such relaxation could easily open up a raft of potential legal loopholes and make regulation much more difficult.

Q31. 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. Alternatively, a second option is to broaden the definition of 'ancillary sales' to include all businesses (and/or not for profit activities) through the use of a general set of qualification criteria, for example, to the effect that: alcohol must be sold or supplied as a small part or proportion of a sales transaction or contract for a wider service, and the amount of alcohol that could be supplied as part of that contract cannot exceed a prescribed amount. Do you think that the qualification criteria proposed meet this aim?

No

Score

0

Q32. Do you think that these proposals would significantly reduce the burdens on ancillary sellers? Please select one option in each row.

	<b>Yes</b>	<b>No</b>	<b>Don't know</b>
<b>Allow premises making ancillary sales to request in their premises licence application that the</b>	X		

<b>requirement for a personal licence holder be removed</b>			
<b>Introduce a new, light-touch form of authorisation for premises making ancillary sales - an ASN but retaining the need for a personal licence holder</b>	X		
<b>Introduce a new, light touch form of authorisation for premises making ancillary sales - an ASN - with no requirement for a personal licence holder</b>	X		

Score

0

Q33. Do you think these proposals would impact adversely on one or more of the licensing objectives? Please select one option.

	Yes	No	Don't know
<b>Allow premises making ancillary sales to request in their premises licence application that the requirement for a personal licence holder be removed</b>	X		
<b>Introduce a new, light-touch form of authorisation for premises making ancillary sales - an ASN but retaining the need for a personal licence holder</b>	X		
<b>Introduce a new, light touch form of authorisation for premises making ancillary sales - an ASN - with no requirement for a personal licence holder</b>	X		

Score

0

Q34. 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 response to a maximum of 200 words:

The best suggestion would be to dispense with the requirement for a personal licence. It is unnecessary and creates excessive bureaucracy where it is not required, Keep the role of DPS, define the role in more detail, keep the requirement for passing a course on the responsible sale of alcohol and the requirement for a personal licence would then be unnecessary.

Page Score

0

## Page 12: Freeing up responsible businesses

Q35. 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.

No

Score

0

Q36. 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
<b>Reduce the burden</b>		X	
<b>Increase the burden</b>	X		

Score

0

Page Score

0

## Page 13: Freeing up responsible businesses

Q37. Should the number of TENs which can be given in respect of individual premises be increased? Please select one option.

No

Score

0

Q38. If you answered yes, please select one option to indicate which you would prefer. Please select one option.

**No Response**

Score

0

Page Score

0

## Page 14: Freeing up responsible businesses

Q39. 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
<b>Determining that premises in certain areas are exempt</b>	X		
<b>Determining that certain premises types are exempt in their local area</b>	X		

Score

0

Q40. 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

Score

0

Q41. 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).

*No Response*

Page Score

0

## Page 15: Freeing up responsible businesses

Q42. Do you agree with each of the following proposals? Please select one option in each row.

	Yes	No	Don't know
<b>Remove requirements to advertise licensing applications in local newspapers</b>	X		
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs for the on and off-trade</b>		X	
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs, but only in respect of overnight accommodation - lodges</b>	X		
<b>Remove or simplify requirements to renew personal licences under the 2003 Act</b>		X	

Score

0

Q43. 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
<b>Remove requirements to advertise licensing applications in local newspapers</b>	X		
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs for the on and off-trade</b>		X	
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs, but only in respect of overnight accommodation - lodges</b>		X	
<b>Remove or simplify requirements to renew personal licences under the 2003 Act</b>		X	

Score

0

Q44. 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.

	Yes	No	Don't know
<b>Remove requirements to advertise licensing applications in local newspapers</b>		X	
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs for the on and off-trade</b>	X		
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs, but only in respect of overnight accommodation - lodges</b>		X	
<b>Remove or simplify requirements to renew personal licences under the 2003 Act</b>		X	

Score

0

Q45. 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 keep your views to a maximum of 200 words.)

Please consider removing the requirement for personal licenses altogether.

Page Score

0

## Page 16: Impact assessments

Q46. Impact assessments for the proposals in this consultation have been published alongside the full consultation document. 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
<b>Minimum unit pricing</b>			X
<b>Multi-buy promotions</b>			X
<b>Health as a licensing objective for cumulative impact</b>			X

<b>Ancillary sales of alcohol</b>			X
<b>Temporary event notices</b>			X
<b>Late night refreshment</b>			X
<b>Removing the duty to advertise licence applications in a local newspaper</b>			X
<b>Sales of alcohol at motorway service stations</b>			X
<b>Personal licences</b>			X

Score

0

Q47. Do you have any comments on the methodologies or assumptions used in the impact assessments? If yes, please specify in the box below, clearly referencing the impact assessment and page to which you refer (keeping your views to a maximum of 400 words).

**No Response**

Page Score

0

## Scoring Summary

Pages	Total
1. About you	0
2. A minimum unit price for alcohol	0
3. A minimum unit price for alcohol	0
4. A ban on multi-buy promotions in the off-trade	0
5. A ban on multi-buy promotions in the off-trade	0
6. Reviewing the mandatory licensing conditions	0
7. Reviewing the mandatory licensing conditions	0
8. Health as a licensing objective for cumulative impact policies	0
9. Health as a licensing objective for	0

cumulative impact policies	
10. Freeing up responsible businesses	0
11. Freeing up responsible businesses	0
12. Freeing up responsible businesses	0
13. Freeing up responsible businesses	0
14. Freeing up responsible businesses	0
15. Freeing up responsible businesses	0
16. Impact assessments	0
<b>Total Survey Score:</b>	<b>0</b>

# Alcohol strategy consultation

---

User Details - 5460844

**Date Started:** 05/02/2013 08:35:29      **Date Ended:** 05/02/2013 09:18:18

**Time taken:** 42 mins, 49 secs      **IP Address:** n/a

**Unique ID:** n/a

---

## Page 1: About you

Q1. Please select if you would like your response or personal details to be treated as confidential.

**No Response**

Score

0

Q2. Which of the following best describes you or the professional interest you represent? Please select one option from the menu below.

Licensing authority

***Please specify which organisation, licensing authority or police force you represent in the box below:***

Charnwood Borough Council

Score

0

Q3. If you are responding on behalf of an organisation or interest group, please write in the box below the number of members in your group or organisation.

400

Q4. How did you obtain the views of your members? Please explain in the box below keeping your response to a maximum of 100 words.

Through meetings with the County Licensing forum and meetings with the Licensing Committee and the town centre forum and Crime reduction Partnership.

Q5. Please indicate in which region you or your organisation is based. Please select one option from the menu below.

East Midlands

Score

0

Q6. If you are responding as a member of the public, what is your gender? Please select one option.

**No Response**

Score

0

Q7. If you are responding as a member of the public, what is your age?  
Please select one option.

**No Response**

Score

0

Page Score

0

## Page 2: A minimum unit price for alcohol

Q8. In the alcohol strategy, the government committed to introducing a minimum unit price for alcohol in England and Wales. This consultation will contribute to the debate on the most appropriate price per unit and the mechanism by which, once set, minimum unit pricing would remain effective. It is also an opportunity for interested parties to raise other issues around minimum unit pricing. The purpose of minimum unit pricing is to reduce alcohol consumption, particularly by the most hazardous and harmful drinkers who tend to show a preference for the cheapest alcohol products. By doing so the government estimates there will be a reduction in the associated crime and health harms, especially the numbers of hospital admissions, alcohol-related deaths and alcohol-related crimes. Minimum unit pricing is not intended disproportionately to affect responsible drinkers or particular social groups but to reduce the availability of alcohol sold at very low or heavily discounted prices. More information (including the definitions of hazardous and harmful drinkers) is available in the full consultation document and the impact assessment. Do you want to answer questions on minimum unit pricing? Please select one option.

Yes

Score

0

Page Score

0

## Page 3: A minimum unit price for alcohol

Q9. The impact of minimum unit pricing will depend on the price per unit of alcohol. The government wants to ensure that the chosen price level is targeted and proportionate, whilst achieving a significant reduction of harm. The government is therefore consulting on the introduction of a recommended minimum unit price of 45p. The government estimates a reduction in consumption across all product types of 3.3 per cent, a reduction in crime of 5,240 per year, a reduction in 24,600 alcohol-related hospital admissions and 714 fewer deaths per year after ten years. Do you agree that this minimum unit price level would achieve these aims? Please select one option.

No

***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):***

The minimum price in Scotland is 50p therefore we feel it should follow the same as them.

Score

0

Q10. Should other factors or evidence be considered when setting a minimum unit price for alcohol? Please select one option.

Yes

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

Some thought that this could be the start of a creeper tax on Alcohol

Score

0

Q11. The government wishes to maintain the effectiveness of minimum unit pricing and is therefore proposing to adjust the minimum unit price level over time. 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

Score

0

Q12. 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.

No

Score

0

Page Score

0

## **Page 4: A ban on multi-buy promotions in the off-trade**

Q13. The government is consulting on introducing a ban on multi-buy promotions in the off-trade (e.g. shops and off-licences) as part of its wider strategy to reduce excessive alcohol consumption, and alongside the introduction of a minimum unit price. A ban on multi-buy promotions would therefore not apply to pubs, clubs, bars or restaurants. The term 'multi-buy promotions' refers to alcohol promotions that offer a discount for buying multiple items. 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. As well as being part of a wider strategy to reduce consumption and tackle irresponsible alcohol sales, a ban on multi-buy promotions would also contribute to the government's aim of encouraging people to be aware of how much they drink and the risks of excessive drinking, so that they can make informed choices. The aim of this

consultation is to assess support for such a ban and contribute to our understanding of the impact a ban on multi-buy promotions may have. The types of promotion it is proposed that a ban would include, are: two for the price of one, three for the price of two, buy one get one free, buy six and get 20 per cent off, 24 cans of lager costing less than 24 times the cost of a single 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, 3 for £10 where each bottle costs more than £3.33. More information is available in the full consultation document and the impact assessment. Do you want to answer questions on a ban on multi-buy promotions in the off-trade? Please select one option.

Yes

Score

0

Page Score

0

## Page 5: A ban on multi-buy promotions in the off-trade

Q14. Do you think there should be a ban on multi-buy promotions involving alcohol in the off-trade? Please select one option.

No

Score

0

Q15. Are there any further offers which should be included in a ban on multi-buy promotions? Please select one option.

Don't know

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

Ban on all Promotions

Score

0

Q16. Should other factors or evidence be taken into account when considering a ban on multi-buy promotions? Please select one option.

Don't know

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

The words used, people are always going to find a way round offers. Should consider more effective education not necessarily bans.

Score

0

Q17. 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.

Don't know

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

Young People/Students party organisers

Score

0

Page Score

0

## **Page 6: Reviewing the mandatory licensing conditions**

Q18. 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 alcohol 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. The government has also committed to consult on whether these mandatory licensing conditions should, where relevant, apply to both the on- and off-trade. This consultation forms part of that review, and will contribute to the government's understanding of how these mandatory conditions are perceived. The five mandatory licensing conditions currently set out in regulations in relation to the supply of alcohol are: a ban on irresponsible promotionsa ban on dispensing alcohol by one person directly into the mouth of anothera requirement to provide free tap water on request to customersa requirement to have an age verification policy to prevent the sale of alcohol to persons under 18 years of age, anda requirement to make available to customers small measures such as half pints or beer or cider or 125ml glasses of wine More information is available in the full consultation document. An explanation of each of these terms can be found on page 20 of the consultation document, in the glossary at the end. Do you want to answer questions on reviewing the mandatory licensing conditions? Please select one option.

Yes

Score

0

Page Score

0

## **Page 7: Reviewing the mandatory licensing conditions**

Q19. Do you think each of the mandatory licensing conditions is effective in promoting the licensing objectives? For more information on the licensing objectives please see the glossary at the end of the full consultation document. Please select one option (Yes, No, Don't know) from each drop down menu.

	Prevention of crime and disorder	Public safety	Prevention of public nuisance	Protection of children from harm
Irresponsible promotions	Yes	Yes	Yes	Yes
Dispensing alcohol directly into the mouth	Yes	Yes	Yes	Yes
Mandatory provision of free tap water	No	Yes	No	No
Age verification policy	Yes	Yes	Yes	Yes
Mandatory provision of small measures	Yes	Yes	Yes	Yes

Score

0

Q20. Do you think that the mandatory licensing conditions do enough to target irresponsible promotions in pubs and clubs? Please select one option.

Yes

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

What about off sales?

Score

0

Q21. Are there other issues related to the licensing objectives which could be tackled through a mandatory licensing condition? Please select one option.

Don't know

Score

0

Q22. Do you think that 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

Score

0

Page Score

0

## Page 8: Health as a licensing objective for cumulative impact policies

Q23. We want to ensure that licensing authorities are able to take alcohol-related health harms into consideration when making decisions about cumulative impact policies (CIPs) which can be used to manage problems linked to the density of premises in specific areas. 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. We are proposing 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. We expect that those areas with the highest levels of alcohol-related health harm, or fast rising levels of harm from alcohol, will be most likely to use this power. It 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. More information is available in the full consultation document and impact assessment. Do you want to answer questions on health as a licensing objective for cumulative impact policies? Please select one option.

Yes

Score

0

Page Score

0

## Page 9: Health as a licensing objective for cumulative impact policies

Q24. 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):

alcohol ambulance pick up data

Casualty information

Street Pastors

Safe Haven

Security staff

Taxi Driver incidents

Refuse cleansing - cleaning up the streets the morning after

CCTV

Radios(Pubwatch)

Q25. 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

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

Evidence to be supported in person by agencies at committees

Score

0

Q26. 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 your answer in the box below, providing evidence to support your response (keeping your views to a maximum of 200 words):

Truer picture of the late night economy issues, more robust.

Problem is getting the information.

Page Score

0

## **Page 10: Freeing up responsible businesses**

Q27. The government has committed to consult on giving licensing authorities greater freedom to take decisions that reflect the needs of their local community. Following the government's Red Tape Challenge in 2011, three areas of reform were specified: alcohol licensing for certain types of premises providing minimal alcohol sales, temporary event notices (TENs) and the licensing of late night refreshment. This section asks for views on these proposals and suggests further ways to reduce burdens on business. The proposals set out here can be seen alongside work undertaken by the Department for Culture, Media and Sport to remove unnecessary red tape from regulated entertainment. More information on each of these areas for reform is available in the full consultation document. There are five subjects covered in this section. They are: ancillary sales of alcohol occasional provision of licensable activities at community events an extension of the temporary event notice limit at individual premises late night refreshment, and further proposals to reduce burdens on business Do you want to answer questions on freeing up responsible businesses? Please select one option.

Yes

Score

0

Page Score

0

## **Page 11: Freeing up responsible businesses**

Q28. Ancillary sales of alcohol For many businesses, the sale of alcohol is only a small part of, or incidental to, their wider activities, and occurs alongside the provision of another product or service (which this consultation refers to as an 'ancillary sale'). For example, a guesthouse might wish to provide wine to its guests with an evening meal or a

complimentary bottle of wine in a guest's room, while a hairdresser might wish to offer clients a glass of wine. 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
<b>The provision should be limited to a specific list of certain types of business and the kinds of sales they make</b>	X		
<b>The provision should be available to all businesses providing they meet certain qualification criteria to be an ancillary seller</b>	X		
<b>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 the above options</b>			X

Score

0

Q29. If special provisions 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.

	Yes	No	Don't know
<b>Accommodation providers, providing alcohol alongside accommodation as part of the contract</b>	X		
<b>Hair and beauty salons, providing alcohol alongside a hair or beauty treatment</b>	X		
<b>Florists, providing alcohol alongside the purchase of flowers</b>	X		
<b>Cultural organisations, such as theatres, cinemas and museums, providing alcohol alongside cultural events as part of the entry ticket</b>	X		
<b>Regular charitable events, providing alcohol as part of the wider occasion</b>		X	

Score

0

Q30. 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 suggestions in the box below, keeping your views to a maximum of 200 words:

School fetes, Christmas Concerts- mulled wine events

Q31. 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. Alternatively, a second option is to broaden the definition of 'ancillary sales' to include all businesses (and/or not for profit activities) through the use of a general set of qualification criteria, for example, to the effect that: alcohol must be sold or supplied as a small part or proportion of a sales transaction or contract for a wider service, and the amount of alcohol that could be supplied as part of that contract cannot exceed a prescribed amount. Do you think that the qualification criteria proposed meet this aim?

Yes

Score

0

Q32. 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
<b>Allow premises making ancillary sales to request in their premises licence application that the requirement for a personal licence holder be removed</b>	X		
<b>Introduce a new, light-touch form of authorisation for premises making ancillary sales - an ASN but retaining the need for a personal licence holder</b>	X		
<b>Introduce a new, light touch form of authorisation for premises making ancillary sales - an ASN - with no requirement for a personal licence holder</b>	X		

Score

0

Q33. Do you think these proposals would impact adversely on one or more of the licensing objectives? Please select one option.

	Yes	No	Don't know
<b>Allow premises making ancillary sales to request</b>	X		

<b>in their premises licence application that the requirement for a personal licence holder be removed</b>			
<b>Introduce a new, light-touch form of authorisation for premises making ancillary sales - an ASN but retaining the need for a personal licence holder</b>		X	
<b>Introduce a new, light touch form of authorisation for premises making ancillary sales - an ASN - with no requirement for a personal licence holder</b>	X		

Score

0

Q34. 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 response to a maximum of 200 words:

Type of premises and whats on offer. clear guidelines needed

Page Score

0

## Page 12: Freeing up responsible businesses

Q35. 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

Score

0

Q36. 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
<b>Reduce the burden</b>	X		
<b>Increase the burden</b>		X	

Score

0

Page Score

0

## Page 13: Freeing up responsible businesses

Q37. Should the number of TENs which can be given in respect of individual premises be increased? Please select one option.

No

Score

0

Q38. If you answered yes, please select one option to indicate which you

would prefer. Please select one option.

**No Response**

Score

0

Page Score

0

## Page 14: Freeing up responsible businesses

Q39. 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
<b>Determining that premises in certain areas are exempt</b>	X		
<b>Determining that certain premises types are exempt in their local area</b>		X	

Score

0

Q40. 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

Score

0

Q41. 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).

N/A

Page Score

0

## Page 15: Freeing up responsible businesses

Q42. Do you agree with each of the following proposals? Please select one option in each row.

	Yes	No	Don't know
<b>Remove requirements to advertise licensing applications in local newspapers</b>	X		
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs for the on and off-trade</b>		X	
<b>Remove the centrally imposed prohibition on the</b>	X		

<b>sale of alcohol at MSAs, but only in respect of overnight accommodation - lodges</b>			
<b>Remove or simplify requirements to renew personal licences under the 2003 Act</b>		X	

Score

0

Q43. 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
<b>Remove requirements to advertise licensing applications in local newspapers</b>	X		
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs for the on and off-trade</b>		X	
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs, but only in respect of overnight accommodation - lodges</b>		X	
<b>Remove or simplify requirements to renew personal licences under the 2003 Act</b>		X	

Score

0

Q44. 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.

	Yes	No	Don't know
<b>Remove requirements to advertise licensing applications in local newspapers</b>		X	
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs for the on and off-trade</b>	X		
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs, but only in respect of overnight accommodation - lodges</b>	X		
<b>Remove or simplify requirements to renew personal licences under the 2003 Act</b>	X		

Score

0

Q45. 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 keep your views to a maximum of 200 words.)

We will still have to re-issue every licence de to dates on them and therefore the financial burden - new badges/licence, phone calls chasing, postage and officer time.

Page Score

0

## Page 16: Impact assessments

Q46. Impact assessments for the proposals in this consultation have been published alongside the full consultation document. 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
<b>Minimum unit pricing</b>		X	
<b>Multi-buy promotions</b>		X	
<b>Health as a licensing objective for cumulative impact</b>	X		
<b>Ancillary sales of alcohol</b>			X
<b>Temporary event notices</b>		X	
<b>Late night refreshment</b>			X
<b>Removing the duty to advertise licence applications in a local newspaper</b>			X
<b>Sales of alcohol at motorway service stations</b>			X
<b>Personal licences</b>		X	

Score

0

Q47. Do you have any comments on the methodologies or assumptions used in the impact assessments? If yes, please specify in the box below, clearly referencing the impact assessment and page to which you refer (keeping your views to a maximum of 400 words).

Plain english and use of simpler terms and should be shorter and more to the point.

Page Score

## Scoring Summary

Pages	Total
1. About you	0
2. A minimum unit price for alcohol	0
3. A minimum unit price for alcohol	0
4. A ban on multi-buy promotions in the off-trade	0
5. A ban on multi-buy promotions in the off-trade	0
6. Reviewing the mandatory licensing conditions	0
7. Reviewing the mandatory licensing conditions	0
8. Health as a licensing objective for cumulative impact policies	0
9. Health as a licensing objective for cumulative impact policies	0
10. Freeing up responsible businesses	0
11. Freeing up responsible businesses	0
12. Freeing up responsible businesses	0
13. Freeing up responsible businesses	0
14. Freeing up responsible businesses	0
15. Freeing up responsible businesses	0
16. Impact assessments	0
<b>Total Survey Score:</b>	<b>0</b>

# Alcohol strategy consultation

---

User Details - 5461210

**Date Started:** 05/02/2013 09:12:05    **Date Ended:** 05/02/2013 09:23:40

**Time taken:** 11 mins, 35 secs    **IP Address:** n/a

**Unique ID:** n/a

---

## Page 1: About you

Q1. Please select if you would like your response or personal details to be treated as confidential.

**No Response**

Score

0

Q2. Which of the following best describes you or the professional interest you represent? Please select one option from the menu below.

Local government (other)

***Please specify which organisation, licensing authority or police force you represent in the box below:***

Rochdale Alcohol Strategy Group

Score

0

Q3. If you are responding on behalf of an organisation or interest group, please write in the box below the number of members in your group or organisation.

40

Q4. How did you obtain the views of your members? Please explain in the box below keeping your response to a maximum of 100 words.

Consulted directly with the group to obtain their opinion of the issues raised in the consultation.

Q5. Please indicate in which region you or your organisation is based.

Please select one option from the menu below.

North West England

Score

0

Q6. If you are responding as a member of the public, what is your gender? Please select one option.

**No Response**

Score

0

Q7. If you are responding as a member of the public, what is your age?

Please select one option.

**No Response**

Score

0

Page Score

0

## Page 2: A minimum unit price for alcohol

Q8. In the alcohol strategy, the government committed to introducing a minimum unit price for alcohol in England and Wales. This consultation will contribute to the debate on the most appropriate price per unit and the mechanism by which, once set, minimum unit pricing would remain effective. It is also an opportunity for interested parties to raise other issues around minimum unit pricing. The purpose of minimum unit pricing is to reduce alcohol consumption, particularly by the most hazardous and harmful drinkers who tend to show a preference for the cheapest alcohol products. By doing so the government estimates there will be a reduction in the associated crime and health harms, especially the numbers of hospital admissions, alcohol-related deaths and alcohol-related crimes. Minimum unit pricing is not intended disproportionately to affect responsible drinkers or particular social groups but to reduce the availability of alcohol sold at very low or heavily discounted prices. More information (including the definitions of hazardous and harmful drinkers) is available in the full consultation document and the impact assessment. Do you want to answer questions on minimum unit pricing? Please select one option.

Yes

Score

0

Page Score

0

## Page 3: A minimum unit price for alcohol

Q9. The impact of minimum unit pricing will depend on the price per unit of alcohol. The government wants to ensure that the chosen price level is targeted and proportionate, whilst achieving a significant reduction of harm. The government is therefore consulting on the introduction of a recommended minimum unit price of 45p. The government estimates a reduction in consumption across all product types of 3.3 per cent, a reduction in crime of 5,240 per year, a reduction in 24,600 alcohol-related hospital admissions and 714 fewer deaths per year after ten years. Do you agree that this minimum unit price level would achieve these aims? Please select one option.

Yes

***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):***

Whilst the benefits proposed for a 45p MUP would achieve the identified

aims, a 50p MUP would deliver even greater benefits. Although the original SchARR modelling has not been used in this consultation due to updated model being produced, the proportionate increase in benefits of having a 50 pence unit price are still likely, even if the numbers involved are smaller due to the effect of inflation since the initial study took place. In the original model, the projected benefits including lives saved, hospital admissions reduced, less crimes and fewer absent days from work all more than doubled when the price was increased from 40p to 50p. We assume that a small increase from the proposed 45p to 50p is achievable and that this would result in proportionally similar impacts of at least 25% greater. When we are talking about people's lives this difference in outcome is important. A 50p MUP would also ensure that we remain consistent with the Scotland proposal and ensure that England and Wales benefits to the same extent.

Score

0

Q10. Should other factors or evidence be considered when setting a minimum unit price for alcohol? Please select one option.

Yes

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

The impact on young people and their drinking habits is of concern to us. Young people generally look for the strongest, cheapest alcohol they can afford. This policy would restrict this and also reduce the amount of 'preloading' they can afford to do at home before a night out. Younger people would then be more likely to drink in the supervised and regulated environments of the pub trade rather than at home. However, the government needs to ensure that education of young people with regards to alcohol is the priority policy so that resilience is increased and alcohol is not able to be used as a facilitator of exploitation like we have seen here in Rochdale. We believe that prices in community pubs will not be affected by the MUP. It will help reduce the disparity in the price of alcohol between supermarkets and community pubs which could lead to more people heading back to our pubs and rebuilding them as integral components of the local community. Safeguards need to be in place to manage the potential increase in crimes as a result of dependant drinkers resorting to that activity to fund their habit. There will also be a rise in illicit, potentially dangerous, alcohol being sold.

Score

0

Q11. The government wishes to maintain the effectiveness of minimum unit pricing and is therefore proposing to adjust the minimum unit price level over time. 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 automatically be updated in line with inflation each year

Score

0

Q12. 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

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

The on trade will benefit as the MUP will reduce the difference in the cost of alcohol between pubs and supermarkets, where alcohol is generally sold much more cheaply. The off trade will benefit from increased profits which will go directly to the businesses. Local evidence suggests that one of the main sources of alcohol for children and young people is from the home. Parents may reduce the amount they spend on alcohol due to the MUP and therefore there would be less available for young people. People on low income e.g. pensioners will be affected by the price – but heavier drinkers are likely to be affected the most.

Score

0

Page Score

0

## **Page 4: A ban on multi-buy promotions in the off-trade**

Q13. The government is consulting on introducing a ban on multi-buy promotions in the off-trade (e.g. shops and off-licences) as part of its wider strategy to reduce excessive alcohol consumption, and alongside the introduction of a minimum unit price. A ban on multi-buy promotions would therefore not apply to pubs, clubs, bars or restaurants. The term 'multi-buy promotions' refers to alcohol promotions that offer a discount for buying multiple items. 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. As well as being part of a wider strategy to reduce consumption and tackle irresponsible alcohol sales, a ban on multi-buy promotions would also contribute to the government's aim of encouraging people to be aware of how much they drink and the risks of excessive drinking, so that they can make informed choices. The aim of this consultation is to assess support for such a ban and contribute to our understanding of the impact a ban on multi-buy promotions may have. The types of promotion it is proposed that a ban would include, are: two for the price of one, three for the price of two, buy one get one free, buy six and get 20 per cent off, 24 cans of lager costing less than 24 times the cost of a single 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, 3 for £10 where each bottle

costs more than £3.33 More information is available in the full consultation document and the impact assessment. Do you want to answer questions on a ban on multi-buy promotions in the off-trade? Please select one option.

Yes

Score

0

Page Score

0

## Page 5: A ban on multi-buy promotions in the off-trade

Q14. Do you think there should be a ban on multi-buy promotions involving alcohol in the off-trade? Please select one option.

Yes

Score

0

Q15. Are there any further offers which should be included in a ban on multi-buy promotions? Please select one option.

Yes

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

The proposed rules about which offers will be acceptable and which will not are open to interpretation. We want to see a ban on all discounted offers in the off-trade. A bottle of wine that usually costs £10 discounted to £5 could encourage customers to get 2 for the price of one whilst they can. Only a proportion of customers would opt to keep the money they save and spend it on other things. If the Alcohol Strategy, and Government, is committing to control the supply of alcohol through price then all offers for reduced cost alcohol should be included in the ban. Money-off coupons should not include alcoholic products.

Score

0

Q16. Should other factors or evidence be taken into account when considering a ban on multi-buy promotions? Please select one option.

Yes

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

A ban on all promotions of alcohol would be much simpler to implement and enforce. The table included the consultation document demonstrates the complexity in defining what is and what is not included in the ban.

Enforcement officers would have to check the individual prices of products included in promotions to assess whether it is compliant or not. If there was a ban on all promotions it would be a lot easier to enforce and leave no room for retailer 'confusion'. It would be easier for retailers to implement a full ban than have to determine what an appropriate promotion is and what is not. We also feel that multi-buy promotions in the on-trade should also be

banned.

Score

0

Q17. 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

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

The off-trade would be affected by having to remove the banned promotions and reconsider how else to attract customers. On trade would benefit as the benefits of buying cheap alcohol from the off-trade would be reduced. There would be an impact on the policing and management of night time economy as there is likely to be a reduction in the practice of 'pre-loading' before a night out, especially in younger people. Moderate drinkers on low income will also be affected by the removal of multi-buy promotions – however heavier drinkers will be effected most.

Score

0

Page Score

0

## **Page 6: Reviewing the mandatory licensing conditions**

Q18. 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 alcohol 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. The government has also committed to consult on whether these mandatory licensing conditions should, where relevant, apply to both the on- and off-trade. This consultation forms part of that review, and will contribute to the government's understanding of how these mandatory conditions are perceived. The five mandatory licensing conditions currently set out in regulations in relation to the supply of alcohol are: a ban on irresponsible promotionsa ban on dispensing alcohol by one person directly into the mouth of anothera requirement to provide free tap water on request to customersa requirement to have an age verification policy to prevent the sale of alcohol to persons under 18 years of age, anda requirement to make available to customers small measures such as half pints or beer or cider or 125ml glasses of wine More information is available in the full consultation document. An explanation of each of these terms can be found on page 20 of the consultation document, in the glossary at the end. Do you want to answer questions on reviewing the mandatory licensing conditions? Please

select one option.

Yes

Score

0

Page Score

0

## Page 7: Reviewing the mandatory licensing conditions

Q19. Do you think each of the mandatory licensing conditions is effective in promoting the licensing objectives? For more information on the licensing objectives please see the glossary at the end of the full consultation document. Please select one option (Yes, No, Don't know) from each drop down menu.

	Prevention of crime and disorder	Public safety	Prevention of public nuisance	Protection of children from harm
Irresponsible promotions	Yes	Yes	Yes	No
Dispensing alcohol directly into the mouth	Yes	Yes	Yes	No
Mandatory provision of free tap water	Yes	Yes	Yes	No
Age verification policy	Yes	Yes	Yes	Yes
Mandatory provision of small measures	Yes	Yes	Yes	Yes

Score

0

Q20. Do you think that the mandatory licensing conditions do enough to target irresponsible promotions in pubs and clubs? Please select one option.

No

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

The current guidance on what constitutes an irresponsible promotion is unclear and open to interpretation. This makes the rules difficult to enforce. Greater clarity is needed so that licensees and enforcement officers know

what is and is not allowed. We also highly recommend that the Government should review the current licensing hours as these are ensuring that alcohol is available any time, day or night, which is adding to the current problematic drinking culture in the country.

Score

0

Q21. Are there other issues related to the licensing objectives which could be tackled through a mandatory licensing condition? Please select one option.

Yes

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

The introduction of a new mandatory condition requiring all staff selling alcohol to undertake an accredited training course. Also, all those responsible for selling alcohol should have a personal licence to ensure appropriate selling of a potentially harmful substance. Children under 18 should not be allowed to sell alcohol. There should be a mandatory condition that restricts the sales of alcohol by people who are under 18 years of age. It should also be mandatory to have till prompts that force an interaction to challenge ID. This should apply to local off licences, not just large retailers. We need to ensure off-trade are held as accountable for the sale of alcohol as on-trade. In Rochdale there is a high correlation between hotspots of alcohol related anti-social behaviour and high density of off-licences. Soft drinks should be priced cheaper than the cheapest alcohol drink, thus removing a possible encouragement for people to drink alcoholic drinks if they are cheaper. Offering shots of spirits away from the bar area should be banned. Happy hours and 'ladies nights' (where there are discounted or free drinks based on a customers gender) should be banned as they encourage excessive consumption of alcohol.

Score

0

Q22. Do you think that 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.

No

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

All mandatory licensing conditions should apply to both on and off trade.

Score

0

Page Score

0

## **Page 8: Health as a licensing objective for cumulative impact policies**

Q23. We want to ensure that licensing authorities are able to take alcohol-

related health harms into consideration when making decisions about cumulative impact policies (CIPs) which can be used to manage problems linked to the density of premises in specific areas. 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. We are proposing 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. We expect that those areas with the highest levels of alcohol-related health harm, or fast rising levels of harm from alcohol, will be most likely to use this power. It 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. More information is available in the full consultation document and impact assessment. Do you want to answer questions on health as a licensing objective for cumulative impact policies? Please select one option.

Yes

Score

0

Page Score

0

## Page 9: Health as a licensing objective for cumulative impact policies

Q24. 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):

Hospital admissions data – both alcohol related and alcohol specific admissions by postcode.

Alcohol related mortality.

Alcohol related violent crime - data by postcode.

Testimonies from victims of ASB could be used to demonstrate the negative impact on wellbeing in a particular area.

Information from local GP's and locally elected members could be used to present the case for harm associated with a particular area or premises.

Treatment data including specialist treatment

Domestic abuse data, including child protection issues

Q25. 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

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

Currently only the police can object to licence applications due to Cumulative Impact Policies (CIP). We believe that all responsible authorities should be able to object to the application, therefore widening the process to consider health data. E.g. if there is a health harm issue but no crime issue, health bodies may object on the grounds of a CIP.

Score

0

Q26. 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 your answer in the box below, providing evidence to support your response (keeping your views to a maximum of 200 words):

The inclusion of alcohol related health harms when considering a CIP will, along with other data, serve to strengthen the case of placing restrictions or invoking licensing reviews on problem premises. The health related harms of alcohol are of equal importance to the effects on crime and disorder so should be assessed together with these to make licensing decisions.

This will strengthen the ability to hold problem premises to account for their non-compliance with conditions or irresponsible practices. Consideration of health harms could also be used to prevent or reduce already identified health problems. For example, if a particular areas is having negative health problem with consumption of alcohol, then alcohol related health harm data could be used to prevent the granting of a new licence to sell alcohol in that area.

Page Score

0

## **Page 10: Freeing up responsible businesses**

Q27. The government has committed to consult on giving licensing authorities greater freedom to take decisions that reflect the needs of their local community. Following the government's Red Tape Challenge in 2011, three areas of reform were specified: alcohol licensing for certain types of premises providing minimal alcohol sales, temporary event notices (TENs) and the licensing of late night refreshment. This section asks for views on these proposals and suggests further ways to reduce burdens on business. The proposals set out here can be seen alongside work undertaken by the Department for Culture, Media and Sport to remove unnecessary red tape from regulated entertainment. More information on each of these areas for

reform is available in the full consultation document. There are five subjects covered in this section. They are: ancillary sales of alcohol occasional provision of licensable activities at community events an extension of the temporary event notice limit at individual premises late night refreshment, and further proposals to reduce burdens on business Do you want to answer questions on freeing up responsible businesses? Please select one option.

Yes

Score

0

Page Score

0

## Page 11: Freeing up responsible businesses

Q28. Ancillary sales of alcohol For many businesses, the sale of alcohol is only a small part of, or incidental to, their wider activities, and occurs alongside the provision of another product or service (which this consultation refers to as an 'ancillary sale'). For example, a guesthouse might wish to provide wine to its guests with an evening meal or a complimentary bottle of wine in a guest's room, while a hairdresser might wish to offer clients a glass of wine. 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
<b>The provision should be limited to a specific list of certain types of business and the kinds of sales they make</b>		X	
<b>The provision should be available to all businesses providing they meet certain qualification criteria to be an ancillary seller</b>		X	
<b>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 the above options</b>		X	

Score

0

Q29. If special provisions 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.

	Yes	No	Don't know

<b>Accommodation providers, providing alcohol alongside accommodation as part of the contract</b>		X	
<b>Hair and beauty salons, providing alcohol alongside a hair or beauty treatment</b>		X	
<b>Florists, providing alcohol alongside the purchase of flowers</b>		X	
<b>Cultural organisations, such as theatres, cinemas and museums, providing alcohol alongside cultural events as part of the entry ticket</b>		X	
<b>Regular charitable events, providing alcohol as part of the wider occasion</b>		X	

Score

0

Q30. 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 suggestions in the box below, keeping your views to a maximum of 200 words:

There should be no deregulation in relation to alcohol. By giving a free mandate for certain businesses we will have no way of making sure they are providing alcohol in an appropriate way. This proposal goes against the need for greater responsibility within the on and off-trade and wider general public in relation to alcohol. It is remiss to exclude a selection of businesses from this responsibility based on the fact that alcohol is not the main component of their business.

Q31. 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. Alternatively, a second option is to broaden the definition of 'ancillary sales' to include all businesses (and/or not for profit activities) through the use of a general set of qualification criteria, for example, to the effect that: alcohol must be sold or supplied as a small part or proportion of a sales transaction or contract for a wider service, and the amount of alcohol that could be supplied as part of that contract cannot exceed a prescribed amount. Do you think that the qualification criteria proposed meet this aim?

No

***Please use the space below to provide further comments (keeping your views to a maximum of 200 words):***

No. As stated above, there should be no exemptions in terms of reducing regulation with regards to alcohol. It could potentially create loopholes for irresponsible businesses to exploit and we can not afford for that to happen.

Alcohol is a potentially harmful substance and if abused it leads to significant health, social and economic harm in society.

Score

0

Q32. 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
<b>Allow premises making ancillary sales to request in their premises licence application that the requirement for a personal licence holder be removed</b>		X	
<b>Introduce a new, light-touch form of authorisation for premises making ancillary sales - an ASN but retaining the need for a personal licence holder</b>		X	
<b>Introduce a new, light touch form of authorisation for premises making ancillary sales - an ASN - with no requirement for a personal licence holder</b>		X	

Score

0

Q33. Do you think these proposals would impact adversely on one or more of the licensing objectives? Please select one option.

	Yes	No	Don't know
<b>Allow premises making ancillary sales to request in their premises licence application that the requirement for a personal licence holder be removed</b>	X		
<b>Introduce a new, light-touch form of authorisation for premises making ancillary sales - an ASN but retaining the need for a personal licence holder</b>	X		
<b>Introduce a new, light touch form of authorisation for premises making ancillary sales - an ASN - with no requirement for a personal licence holder</b>	X		

Score

0

Q34. 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 response to a maximum of 200 words:

We do not agree with a 'lighter touch' authorisation. We are concerned

about the fragmentation of the Licensing Act which would create a system open to loopholes and abuse which we do not want to see happen.

Page Score

0

## Page 12: Freeing up responsible businesses

Q35. 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.

No

Score

0

Q36. 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
Reduce the burden		X	
Increase the burden	X		

Score

0

Page Score

0

## Page 13: Freeing up responsible businesses

Q37. Should the number of TENs which can be given in respect of individual premises be increased? Please select one option.

No

Score

0

Q38. If you answered yes, please select one option to indicate which you would prefer. Please select one option.

**No Response**

Score

0

Page Score

0

## Page 14: Freeing up responsible businesses

Q39. 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
Determining that premises in certain areas are		X	

<b>exempt</b>			
<b>Determining that certain premises types are exempt in their local area</b>		X	

Score

0

Q40. 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.

No

Score

0

Q41. 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).

None

Page Score

0

## Page 15: Freeing up responsible businesses

Q42. Do you agree with each of the following proposals? Please select one option in each row.

	Yes	No	Don't know
<b>Remove requirements to advertise licensing applications in local newspapers</b>	X		
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs for the on and off-trade</b>		X	
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs, but only in respect of overnight accommodation - lodges</b>		X	
<b>Remove or simplify requirements to renew personal licences under the 2003 Act</b>		X	

Score

0

Q43. 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
<b>Remove requirements to advertise licensing applications in local newspapers</b>	X		

<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs for the on and off-trade</b>		X	
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs, but only in respect of overnight accommodation - lodges</b>		X	
<b>Remove or simplify requirements to renew personal licences under the 2003 Act</b>		X	

Score

0

Q44. 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.

	Yes	No	Don't know
<b>Remove requirements to advertise licensing applications in local newspapers</b>		X	
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs for the on and off-trade</b>	X		
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs, but only in respect of overnight accommodation - lodges</b>	X		
<b>Remove or simplify requirements to renew personal licences under the 2003 Act</b>	X		

Score

0

Q45. 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 keep your views to a maximum of 200 words.)

We want to simplify the application forms in relation to regulated entertainment so that when applicants are completing the form they only have to complete what section they are applying for and not have to respond to sections that are irrelevant to them. E.g. if an applicant only wanted live music then they only need to respond to that section.

In addition we feel that asking about the provision of alcohol should be the first choice on the list not the last as it currently is so it is given the priority it deserves.

Page Score

0

## Page 16: Impact assessments

Q46. Impact assessments for the proposals in this consultation have been published alongside the full consultation document. 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
Minimum unit pricing	X		
Multi-buy promotions	X		
Health as a licensing objective for cumulative impact			X
Ancillary sales of alcohol			X
Temporary event notices			X
Late night refreshment			X
Removing the duty to advertise licence applications in a local newspaper			X
Sales of alcohol at motorway service stations			X
Personal licences			X

Score

0

Q47. Do you have any comments on the methodologies or assumptions used in the impact assessments? If yes, please specify in the box below, clearly referencing the impact assessment and page to which you refer (keeping your views to a maximum of 400 words).

*No Response*

Page Score

0

## Scoring Summary

Pages	Total
1. About you	0
2. A minimum unit price for alcohol	0

3. A minimum unit price for alcohol	0
4. A ban on multi-buy promotions in the off-trade	0
5. A ban on multi-buy promotions in the off-trade	0
6. Reviewing the mandatory licensing conditions	0
7. Reviewing the mandatory licensing conditions	0
8. Health as a licensing objective for cumulative impact policies	0
9. Health as a licensing objective for cumulative impact policies	0
10. Freeing up responsible businesses	0
11. Freeing up responsible businesses	0
12. Freeing up responsible businesses	0
13. Freeing up responsible businesses	0
14. Freeing up responsible businesses	0
15. Freeing up responsible businesses	0
16. Impact assessments	0
<b>Total Survey Score:</b>	<b>0</b>

# Alcohol strategy consultation

User Details - 5460986

**Date Started:** 05/02/2013 08:48:26    **Date Ended:** 05/02/2013 09:25:25

**Time taken:** 36 mins, 59 secs    **IP Address:** n/a

**Unique ID:** n/a

## Page 1: About you

Q1. Please select if you would like your response or personal details to be treated as confidential.

*No Response*

Score

0

Q2. Which of the following best describes you or the professional interest you represent? Please select one option from the menu below.

Individual involved in licensed trade/club premises

***Please specify which organisation, licensing authority or police force you represent in the box below:***

Worth-Inns

Score

0

Q3. If you are responding on behalf of an organisation or interest group, please write in the box below the number of members in your group or organisation.

*No Response*

Q4. How did you obtain the views of your members? Please explain in the box below keeping your response to a maximum of 100 words.

*No Response*

Q5. Please indicate in which region you or your organisation is based.

Please select one option from the menu below.

Yorkshire and the Humber

Score

0

Q6. If you are responding as a member of the public, what is your gender? Please select one option.

Male

Score

0

Q7. If you are responding as a member of the public, what is your age? Please select one option.

35-54

Score

0

Page Score

0

## Page 2: A minimum unit price for alcohol

Q8. In the alcohol strategy, the government committed to introducing a minimum unit price for alcohol in England and Wales. This consultation will contribute to the debate on the most appropriate price per unit and the mechanism by which, once set, minimum unit pricing would remain effective. It is also an opportunity for interested parties to raise other issues around minimum unit pricing. The purpose of minimum unit pricing is to reduce alcohol consumption, particularly by the most hazardous and harmful drinkers who tend to show a preference for the cheapest alcohol products. By doing so the government estimates there will be a reduction in the associated crime and health harms, especially the numbers of hospital admissions, alcohol-related deaths and alcohol-related crimes. Minimum unit pricing is not intended disproportionately to affect responsible drinkers or particular social groups but to reduce the availability of alcohol sold at very low or heavily discounted prices. More information (including the definitions of hazardous and harmful drinkers) is available in the full consultation document and the impact assessment. Do you want to answer questions on minimum unit pricing? Please select one option.

Yes

Score

0

Page Score

0

## Page 3: A minimum unit price for alcohol

Q9. The impact of minimum unit pricing will depend on the price per unit of alcohol. The government wants to ensure that the chosen price level is targeted and proportionate, whilst achieving a significant reduction of harm. The government is therefore consulting on the introduction of a recommended minimum unit price of 45p. The government estimates a reduction in consumption across all product types of 3.3 per cent, a reduction in crime of 5,240 per year, a reduction in 24,600 alcohol-related hospital admissions and 714 fewer deaths per year after ten years. Do you agree that this minimum unit price level would achieve these aims? Please select one option.

No

***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):***

I feel the people the minium price is aimed at tend to drink very strong Lagers and or Cider, such as Tennets Super, Special Brew, Frosty Jack

Cider it is these high abv very cheap off sale products that need looking at.

Score

0

Q10. Should other factors or evidence be considered when setting a minimum unit price for alcohol? Please select one option.

Yes

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

People with alcohol problems tend not to drink low alcohol (less than 6%) drinks

Score

0

Q11. The government wishes to maintain the effectiveness of minimum unit pricing and is therefore proposing to adjust the minimum unit price level over time. 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

Score

0

Q12. 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.

Don't know

Score

0

Page Score

0

## **Page 4: A ban on multi-buy promotions in the off-trade**

Q13. The government is consulting on introducing a ban on multi-buy promotions in the off-trade (e.g. shops and off-licences) as part of its wider strategy to reduce excessive alcohol consumption, and alongside the introduction of a minimum unit price. A ban on multi-buy promotions would therefore not apply to pubs, clubs, bars or restaurants. The term 'multi-buy promotions' refers to alcohol promotions that offer a discount for buying multiple items. 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. As well as being part of a wider strategy to reduce consumption and tackle irresponsible alcohol sales, a ban on multi-buy promotions would also contribute to the government's aim of encouraging people to be aware of how much they drink and the risks of excessive drinking, so that they can make informed choices. The aim of this

consultation is to assess support for such a ban and contribute to our understanding of the impact a ban on multi-buy promotions may have. The types of promotion it is proposed that a ban would include, are: two for the price of one, three for the price of two, buy one get one free, buy six and get 20 per cent off, 24 cans of lager costing less than 24 times the cost of a single 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, 3 for £10 where each bottle costs more than £3.33. More information is available in the full consultation document and the impact assessment. Do you want to answer questions on a ban on multi-buy promotions in the off-trade? Please select one option.

Yes

Score

0

Page Score

0

## Page 5: A ban on multi-buy promotions in the off-trade

Q14. Do you think there should be a ban on multi-buy promotions involving alcohol in the off-trade? Please select one option.

Yes

Score

0

Q15. Are there any further offers which should be included in a ban on multi-buy promotions? Please select one option.

Yes

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

Any cost reduction buy 3 for 2 is the same as 33% off !!

Score

0

Q16. Should other factors or evidence be taken into account when considering a ban on multi-buy promotions? Please select one option.

Don't know

Score

0

Q17. 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.

Don't know

Score

0

Page Score

0

## Page 6: Reviewing the mandatory licensing conditions

Q18. 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 alcohol 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. The government has also committed to consult on whether these mandatory licensing conditions should, where relevant, apply to both the on- and off-trade. This consultation forms part of that review, and will contribute to the government's understanding of how these mandatory conditions are perceived. The five mandatory licensing conditions currently set out in regulations in relation to the supply of alcohol are: a ban on irresponsible promotions, a ban on dispensing alcohol by one person directly into the mouth of another, a requirement to provide free tap water on request to customers, a requirement to have an age verification policy to prevent the sale of alcohol to persons under 18 years of age, and a requirement to make available to customers small measures such as half pints of beer or cider or 125ml glasses of wine. More information is available in the full consultation document. An explanation of each of these terms can be found on page 20 of the consultation document, in the glossary at the end. Do you want to answer questions on reviewing the mandatory licensing conditions? Please select one option.

Yes

Score

0

Page Score

0

## Page 7: Reviewing the mandatory licensing conditions

Q19. Do you think each of the mandatory licensing conditions is effective in promoting the licensing objectives? For more information on the licensing objectives please see the glossary at the end of the full consultation document. Please select one option (Yes, No, Don't know) from each drop down menu.

	Prevention of crime and disorder	Public safety	Prevention of public nuisance	Protection of children from harm
Irresponsible promotions	Yes	Don't know	No	Don't know
Dispensing	Yes	Yes	Yes	Don't know

<b>alcohol directly into the mouth</b>				
<b>Mandatory provision of free tap water</b>	No	Yes	No	Don't know
<b>Age verification policy</b>	Yes	Yes	No	Don't know
<b>Mandatory provision of small measures</b>	No	No	Don't know	Don't know

Score

0

Q20. Do you think that the mandatory licensing conditions do enough to target irresponsible promotions in pubs and clubs? Please select one option.

Yes

Score

0

Q21. Are there other issues related to the licensing objectives which could be tackled through a mandatory licensing condition? Please select one option.

Yes

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

Strong drinks that responsible drinker would not be seen dead with, these are non branded high abv, industrialised products

Score

0

Q22. Do you think that 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.

No

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

The main issue to the on trade has to be pre loading, buying for the supermarket (off trade) drinking unsupervised and then going out to the on trade, this and the massive increase in social drugs.

Score

0

Page Score

0

**Page 8: Health as a licensing objective for**

## **cumulative impact policies**

Q23. We want to ensure that licensing authorities are able to take alcohol-related health harms into consideration when making decisions about cumulative impact policies (CIPs) which can be used to manage problems linked to the density of premises in specific areas. 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. We are proposing 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. We expect that those areas with the highest levels of alcohol-related health harm, or fast rising levels of harm from alcohol, will be most likely to use this power. It 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. More information is available in the full consultation document and impact assessment. Do you want to answer questions on health as a licensing objective for cumulative impact policies? Please select one option.

Yes

Score

0

Page Score

0

## **Page 9: Health as a licensing objective for cumulative impact policies**

Q24. 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):

I feel the problem is much wider than just alcohol, as a publican in a small real ale on trade, our main issue is the use of 'social drugs' products from a unknown source and many with a untested effect when mixed with other products.

Q25. 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.

Don't know

Score

0

Q26. 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 your answer in the box below, providing evidence to support your response (keeping your views to a maximum of 200 words):

**No Response**

Page Score

0

## Page 10: Freeing up responsible businesses

Q27. The government has committed to consult on giving licensing authorities greater freedom to take decisions that reflect the needs of their local community. Following the government's Red Tape Challenge in 2011, three areas of reform were specified: alcohol licensing for certain types of premises providing minimal alcohol sales, temporary event notices (TENs) and the licensing of late night refreshment. This section asks for views on these proposals and suggests further ways to reduce burdens on business. The proposals set out here can be seen alongside work undertaken by the Department for Culture, Media and Sport to remove unnecessary red tape from regulated entertainment. More information on each of these areas for reform is available in the full consultation document. There are five subjects covered in this section. They are: ancillary sales of alcohol occasional provision of licensable activities at community events an extension of the temporary event notice limit at individual premises late night refreshment, and further proposals to reduce burdens on business Do you want to answer questions on freeing up responsible businesses? Please select one option.

Yes

Score

0

Page Score

0

## Page 11: Freeing up responsible businesses

Q28. Ancillary sales of alcohol For many businesses, the sale of alcohol is only a small part of, or incidental to, their wider activities, and occurs alongside the provision of another product or service (which this consultation refers to as an 'ancillary sale'). For example, a guesthouse might wish to provide wine to its guests with an evening meal or a complimentary bottle of wine in a guest's room, while a hairdresser might wish to offer clients a glass of wine. 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

<b>The provision should be limited to a specific list of certain types of business and the kinds of sales they make</b>	X		
<b>The provision should be available to all businesses providing they meet certain qualification criteria to be an ancillary seller</b>		X	
<b>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 the above options</b>		X	

Score

0

Q29. If special provisions 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.

	Yes	No	Don't know
<b>Accommodation providers, providing alcohol alongside accommodation as part of the contract</b>	X		
<b>Hair and beauty salons, providing alcohol alongside a hair or beauty treatment</b>		X	
<b>Florists, providing alcohol alongside the purchase of flowers</b>		X	
<b>Cultural organisations, such as theatres, cinemas and museums, providing alcohol alongside cultural events as part of the entry ticket</b>	X		
<b>Regular charitable events, providing alcohol as part of the wider occasion</b>		X	

Score

0

Q30. 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 suggestions in the box below, keeping your views to a maximum of 200 words:

**No Response**

Q31. 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. Alternatively, a second option is to broaden the definition of 'ancillary sales' to include all businesses (and/or not for profit activities) through the use of a general set of qualification criteria, for example, to the effect that: alcohol must be sold or supplied as a small part or proportion of a sales transaction or contract for a wider service, and the amount of alcohol that could be supplied as part of that contract cannot exceed a prescribed amount. Do you think that the qualification criteria proposed meet this aim?

No

Score

0

Q32. 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
<b>Allow premises making ancillary sales to request in their premises licence application that the requirement for a personal licence holder be removed</b>	X		
<b>Introduce a new, light-touch form of authorisation for premises making ancillary sales - an ASN but retaining the need for a personal licence holder</b>	X		
<b>Introduce a new, light touch form of authorisation for premises making ancillary sales - an ASN - with no requirement for a personal licence holder</b>	X		

Score

0

Q33. Do you think these proposals would impact adversely on one or more of the licensing objectives? Please select one option.

	Yes	No	Don't know
<b>Allow premises making ancillary sales to request in their premises licence application that the requirement for a personal licence holder be removed</b>			X
<b>Introduce a new, light-touch form of authorisation for premises making ancillary sales - an ASN but retaining the need for a personal licence holder</b>	X		
<b>Introduce a new, light touch form of authorisation for premises making ancillary sales - an ASN -</b>			X

**with no requirement for a personal licence holder**

Score

0

Q34. 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 response to a maximum of 200 words:

*No Response*

Page Score

0

## Page 12: Freeing up responsible businesses

Q35. 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.

No

Score

0

Q36. 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
Reduce the burden	X		
Increase the burden			X

Score

0

Page Score

0

## Page 13: Freeing up responsible businesses

Q37. Should the number of TENs which can be given in respect of individual premises be increased? Please select one option.

Yes

Score

0

Q38. If you answered yes, please select one option to indicate which you would prefer. Please select one option.

18

Score

0

Page Score

0

## Page 14: Freeing up responsible businesses

Q39. 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
<b>Determining that premises in certain areas are exempt</b>	X		
<b>Determining that certain premises types are exempt in their local area</b>	X		

Score

0

Q40. 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.

No

Score

0

Q41. 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).

*No Response*

Page Score

0

## Page 15: Freeing up responsible businesses

Q42. Do you agree with each of the following proposals? Please select one option in each row.

	Yes	No	Don't know
<b>Remove requirements to advertise licensing applications in local newspapers</b>	X		
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs for the on and off-trade</b>		X	
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs, but only in respect of overnight accommodation - lodges</b>		X	
<b>Remove or simplify requirements to renew personal licences under the 2003 Act</b>		X	

Score

0

Q43. 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
<b>Remove requirements to advertise licensing applications in local newspapers</b>	X		
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs for the on and off-trade</b>			X
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs, but only in respect of overnight accommodation - lodges</b>			X
<b>Remove or simplify requirements to renew personal licences under the 2003 Act</b>	X		

Score

0

Q44. 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.

	Yes	No	Don't know
<b>Remove requirements to advertise licensing applications in local newspapers</b>		X	
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs for the on and off-trade</b>	X		
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs, but only in respect of overnight accommodation - lodges</b>	X		
<b>Remove or simplify requirements to renew personal licences under the 2003 Act</b>		X	

Score

0

Q45. 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 keep your views to a maximum of 200 words.)

*No Response*

Page Score

0

## Page 16: Impact assessments

Q46. Impact assessments for the proposals in this consultation have been published alongside the full consultation document. 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
Minimum unit pricing	X		
Multi-buy promotions		X	
Health as a licensing objective for cumulative impact		X	
Ancillary sales of alcohol	X		
Temporary event notices	X		
Late night refreshment	X		
Removing the duty to advertise licence applications in a local newspaper	X		
Sales of alcohol at motorway service stations		X	
Personal licences		X	

Score

0

Q47. Do you have any comments on the methodologies or assumptions used in the impact assessments? If yes, please specify in the box below, clearly referencing the impact assessment and page to which you refer (keeping your views to a maximum of 400 words).

*No Response*

Page Score

0

## Scoring Summary

Pages	Total
1. About you	0
2. A minimum unit price for alcohol	0
3. A minimum unit price for alcohol	0
4. A ban on multi-buy promotions in the	0

off-trade	
5. A ban on multi-buy promotions in the off-trade	0
6. Reviewing the mandatory licensing conditions	0
7. Reviewing the mandatory licensing conditions	0
8. Health as a licensing objective for cumulative impact policies	0
9. Health as a licensing objective for cumulative impact policies	0
10. Freeing up responsible businesses	0
11. Freeing up responsible businesses	0
12. Freeing up responsible businesses	0
13. Freeing up responsible businesses	0
14. Freeing up responsible businesses	0
15. Freeing up responsible businesses	0
16. Impact assessments	0
<b>Total Survey Score:</b>	<b>0</b>

# Alcohol strategy consultation

---

User Details - 5385762

**Date Started:** 22/01/2013 13:39:59      **Date Ended:** 05/02/2013 09:39:19

**Time taken:** 331 hrs, 59 mins, 20 secs   **IP Address:** n/a

**Unique ID:** n/a

---

## Page 1: About you

Q1. Please select if you would like your response or personal details to be treated as confidential.

**No Response**

Score

0

Q2. Which of the following best describes you or the professional interest you represent? Please select one option from the menu below.

Other

***Please specify which organisation, licensing authority or police force you represent in the box below:***

Canterbury Community Safety Partnership

Score

0

Q3. If you are responding on behalf of an organisation or interest group, please write in the box below the number of members in your group or organisation.

200

Q4. How did you obtain the views of your members? Please explain in the box below keeping your response to a maximum of 100 words.

Put questions to 90 members at the annual conference using interactive digital voting device.

Q5. Please indicate in which region you or your organisation is based.

Please select one option from the menu below.

South East England

Score

0

Q6. If you are responding as a member of the public, what is your gender? Please select one option.

**No Response**

Score

0

Q7. If you are responding as a member of the public, what is your age?

Please select one option.

**No Response**

Score

0

Page Score

0

## Page 2: A minimum unit price for alcohol

Q8. In the alcohol strategy, the government committed to introducing a minimum unit price for alcohol in England and Wales. This consultation will contribute to the debate on the most appropriate price per unit and the mechanism by which, once set, minimum unit pricing would remain effective. It is also an opportunity for interested parties to raise other issues around minimum unit pricing. The purpose of minimum unit pricing is to reduce alcohol consumption, particularly by the most hazardous and harmful drinkers who tend to show a preference for the cheapest alcohol products. By doing so the government estimates there will be a reduction in the associated crime and health harms, especially the numbers of hospital admissions, alcohol-related deaths and alcohol-related crimes. Minimum unit pricing is not intended disproportionately to affect responsible drinkers or particular social groups but to reduce the availability of alcohol sold at very low or heavily discounted prices. More information (including the definitions of hazardous and harmful drinkers) is available in the full consultation document and the impact assessment. Do you want to answer questions on minimum unit pricing? Please select one option.

Yes

Score

0

Page Score

0

## Page 3: A minimum unit price for alcohol

Q9. The impact of minimum unit pricing will depend on the price per unit of alcohol. The government wants to ensure that the chosen price level is targeted and proportionate, whilst achieving a significant reduction of harm. The government is therefore consulting on the introduction of a recommended minimum unit price of 45p. The government estimates a reduction in consumption across all product types of 3.3 per cent, a reduction in crime of 5,240 per year, a reduction in 24,600 alcohol-related hospital admissions and 714 fewer deaths per year after ten years. Do you agree that this minimum unit price level would achieve these aims? Please select one option.

No

***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):***

The proposed minimum price of £0.45 per unit will not make any difference

to consumption levels as the minimum price per unit proposed is less than most deals offered on popular packs per beer, lager, cider etc, for example £10 for 20 bottles is a unit price of £0.50. 71% of members held this view. Whatever the minimum unit price is set, this will not stop the purchasing and consumption as a single product is 500% more expensive in a public house.

Score

0

Q10. Should other factors or evidence be considered when setting a minimum unit price for alcohol? Please select one option.

Yes

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

Research and findings from other countries where this measure has been used.

Score

0

Q11. The government wishes to maintain the effectiveness of minimum unit pricing and is therefore proposing to adjust the minimum unit price level over time. 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

Score

0

Q12. 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

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

Local authorities and the police. The low cost of alcohol encourages 'pre-loading' and drunken / anti-social behaviour is committed by customers who have very little to drink in bars, pubs, restaurants etc as the cost is financially prohibitive. Therefore a high minimum unit price may reduce alcohol consumption.

Score

0

Page Score

0

## **Page 4: A ban on multi-buy promotions in the off-trade**

Q13. The government is consulting on introducing a ban on multi-buy promotions in the off-trade (e.g. shops and off-licences) as part of its wider strategy to reduce excessive alcohol consumption, and alongside the

introduction of a minimum unit price. A ban on multi-buy promotions would therefore not apply to pubs, clubs, bars or restaurants. The term 'multi-buy promotions' refers to alcohol promotions that offer a discount for buying multiple items. 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. As well as being part of a wider strategy to reduce consumption and tackle irresponsible alcohol sales, a ban on multi-buy promotions would also contribute to the government's aim of encouraging people to be aware of how much they drink and the risks of excessive drinking, so that they can make informed choices. The aim of this consultation is to assess support for such a ban and contribute to our understanding of the impact a ban on multi-buy promotions may have. The types of promotion it is proposed that a ban would include, are: two for the price of one, three for the price of two, buy one get one free, buy six and get 20 per cent off, 24 cans of lager costing less than 24 times the cost of a single 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, 3 for £10 where each bottle costs more than £3.33. More information is available in the full consultation document and the impact assessment. Do you want to answer questions on a ban on multi-buy promotions in the off-trade? Please select one option.

Yes

Score

0

Page Score

0

## Page 5: A ban on multi-buy promotions in the off-trade

Q14. Do you think there should be a ban on multi-buy promotions involving alcohol in the off-trade? Please select one option.

No

Score

0

Q15. Are there any further offers which should be included in a ban on multi-buy promotions? Please select one option.

Yes

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

Retailers should not be allowed to use alcohol as 'loss-leaders'. Retailers restrict the number of packs that can be bought by a single person due to the fact that the product is a 'loss-leader' thereby minimising profit loss while facilitating irresponsible drinking.

Score

0

Q16. Should other factors or evidence be taken into account when

considering a ban on multi-buy promotions? Please select one option.

Don't know

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

Could consider geographical issues based on average consumption figures or health related data.

Score

0

Q17. 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.

No

Score

0

Page Score

0

## **Page 6: Reviewing the mandatory licensing conditions**

Q18. 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 alcohol 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. The government has also committed to consult on whether these mandatory licensing conditions should, where relevant, apply to both the on- and off-trade. This consultation forms part of that review, and will contribute to the government's understanding of how these mandatory conditions are perceived. The five mandatory licensing conditions currently set out in regulations in relation to the supply of alcohol are: a ban on irresponsible promotionsa ban on dispensing alcohol by one person directly into the mouth of anothera requirement to provide free tap water on request to customersa requirement to have an age verification policy to prevent the sale of alcohol to persons under 18 years of age, anda requirement to make available to customers small measures such as half pints or beer or cider or 125ml glasses of wine More information is available in the full consultation document. An explanation of each of these terms can be found on page 20 of the consultation document, in the glossary at the end. Do you want to answer questions on reviewing the mandatory licensing conditions? Please select one option.

Yes

Score

0

Page Score

0

## Page 7: Reviewing the mandatory licensing conditions

Q19. Do you think each of the mandatory licensing conditions is effective in promoting the licensing objectives? For more information on the licensing objectives please see the glossary at the end of the full consultation document. Please select one option (Yes, No, Don't know) from each drop down menu.

	Prevention of crime and disorder	Public safety	Prevention of public nuisance	Protection of children from harm
<b>Irresponsible promotions</b>	Yes	Yes	Yes	Yes
<b>Dispensing alcohol directly into the mouth</b>	Yes	Yes	Yes	Yes
<b>Mandatory provision of free tap water</b>	No	No	No	No
<b>Age verification policy</b>	Yes	Yes	Yes	Yes
<b>Mandatory provision of small measures</b>	Yes	Yes	Yes	Yes

Score

0

Q20. Do you think that the mandatory licensing conditions do enough to target irresponsible promotions in pubs and clubs? Please select one option.

No

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

Legislation should state that if a mandatory condition is breached, a licence is automatically suspended by a statutory authority until a full review can be undertaken by a Licensing Sub-Committee. A suspension can be removed at any time by the relevant statutory authority if the alleged breach cannot be proved.

Score

0

Q21. Are there other issues related to the licensing objectives which could

be tackled through a mandatory licensing condition? Please select one option.

Yes

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

The DPS must provide a contact number that is available 24 hours per day, 7 days per week

Score

0

Q22. Do you think that 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.

No

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

See above re automatic suspension.

Score

0

Page Score

0

## **Page 8: Health as a licensing objective for cumulative impact policies**

Q23. We want to ensure that licensing authorities are able to take alcohol-related health harms into consideration when making decisions about cumulative impact policies (CIPs) which can be used to manage problems linked to the density of premises in specific areas. 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. We are proposing 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. We expect that those areas with the highest levels of alcohol-related health harm, or fast rising levels of harm from alcohol, will be most likely to use this power. It 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. More information is available in the full consultation document and impact assessment. Do you want to answer questions on health as a licensing objective for cumulative impact policies? Please select one option.

Yes

Score

0

Page Score

0

## Page 9: Health as a licensing objective for cumulative impact policies

Q24. 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):

Ambulance attendances for alcohol related incidents

A&E Alcohol related admissions

Age groups of long-term alcohol issues together types of illness

Types of alcohol drunk in different environments

Q25. 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

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

If, for example, an area attracts a particular age group which results in drunkenness and anti-social behaviour. If an application is in a cumulative area the application should always be considered by the LA i.e. no grant by statute.

Score

0

Q26. 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 your answer in the box below, providing evidence to support your response (keeping your views to a maximum of 200 words):

It would be likely to increase the number of cumulative impact areas.

Conditions could be introduced restricting the number and types of drink that can be bought by a single person, eg shots and 'fishbowls'

Page Score

0

## Page 10: Freeing up responsible businesses

Q27. The government has committed to consult on giving licensing authorities greater freedom to take decisions that reflect the needs of their local community. Following the government's Red Tape Challenge in 2011, three areas of reform were specified: alcohol licensing for certain types of premises providing minimal alcohol sales, temporary event notices (TENs) and the licensing of late night refreshment. This section asks for views on these proposals and suggests further ways to reduce burdens on business. The proposals set out here can be seen alongside work undertaken by the Department for Culture, Media and Sport to remove unnecessary red tape

from regulated entertainment. More information on each of these areas for reform is available in the full consultation document. There are five subjects covered in this section. They are: ancillary sales of alcohol occasional provision of licensable activities at community events an extension of the temporary event notice limit at individual premises late night refreshment, and further proposals to reduce burdens on business Do you want to answer questions on freeing up responsible businesses? Please select one option.

Yes

Score

0

Page Score

0

## Page 11: Freeing up responsible businesses

Q28. Ancillary sales of alcohol For many businesses, the sale of alcohol is only a small part of, or incidental to, their wider activities, and occurs alongside the provision of another product or service (which this consultation refers to as an 'ancillary sale'). For example, a guesthouse might wish to provide wine to its guests with an evening meal or a complimentary bottle of wine in a guest's room, while a hairdresser might wish to offer clients a glass of wine. 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
<b>The provision should be limited to a specific list of certain types of business and the kinds of sales they make</b>	X		
<b>The provision should be available to all businesses providing they meet certain qualification criteria to be an ancillary seller</b>	X		
<b>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 the above options</b>	X		

Score

0

Q29. If special provisions 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.

	Yes	No	Don't know
<b>Accommodation providers, providing alcohol alongside accommodation as part of the contract</b>	X		
<b>Hair and beauty salons, providing alcohol alongside a hair or beauty treatment</b>	X		
<b>Florists, providing alcohol alongside the purchase of flowers</b>	X		
<b>Cultural organisations, such as theatres, cinemas and museums, providing alcohol alongside cultural events as part of the entry ticket</b>	X		
<b>Regular charitable events, providing alcohol as part of the wider occasion</b>	X		
Score			

0

Q30. 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 suggestions in the box below, keeping your views to a maximum of 200 words:

Family, non-profit making events, such as weddings and christenings should be included

Charity should include school quiz, church fete etc

Q31. 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. Alternatively, a second option is to broaden the definition of 'ancillary sales' to include all businesses (and/or not for profit activities) through the use of a general set of qualification criteria, for example, to the effect that: alcohol must be sold or supplied as a small part or proportion of a sales transaction or contract for a wider service, and the amount of alcohol that could be supplied as part of that contract cannot exceed a prescribed amount. Do you think that the qualification criteria proposed meet this aim?

Yes

***Please use the space below to provide further comments (keeping your views to a maximum of 200 words):***

Reason - a responsible person should have some legal knowledge of the Licensing Law.

Score

0

Q32. 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
<b>Allow premises making ancillary sales to request in their premises licence application that the requirement for a personal licence holder be removed</b>	X		
<b>Introduce a new, light-touch form of authorisation for premises making ancillary sales - an ASN but retaining the need for a personal licence holder</b>	X		
<b>Introduce a new, light touch form of authorisation for premises making ancillary sales - an ASN - with no requirement for a personal licence holder</b>	X		

Score

0

Q33. Do you think these proposals would impact adversely on one or more of the licensing objectives? Please select one option.

	Yes	No	Don't know
<b>Allow premises making ancillary sales to request in their premises licence application that the requirement for a personal licence holder be removed</b>	X		
<b>Introduce a new, light-touch form of authorisation for premises making ancillary sales - an ASN but retaining the need for a personal licence holder</b>		X	
<b>Introduce a new, light touch form of authorisation for premises making ancillary sales - an ASN - with no requirement for a personal licence holder</b>		X	

Score

0

Q34. 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 response to a maximum of 200 words:

**No Response**

Page Score

0

## Page 12: Freeing up responsible businesses

Q35. 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.

No

Score

0

Q36. 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
Reduce the burden		X	
Increase the burden	X		

Score

0

Page Score

0

## Page 13: Freeing up responsible businesses

Q37. Should the number of TENs which can be given in respect of individual premises be increased? Please select one option.

No

Score

0

Q38. If you answered yes, please select one option to indicate which you would prefer. Please select one option.

Don't know

Score

0

Page Score

0

## Page 14: Freeing up responsible businesses

Q39. 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
Determining that premises in certain areas are exempt		X	
Determining that certain premises types are exempt in their local area		X	

Score

0

Q40. 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

Score

0

Q41. 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).

*No Response*

Page Score

0

## Page 15: Freeing up responsible businesses

Q42. Do you agree with each of the following proposals? Please select one option in each row.

	Yes	No	Don't know
<b>Remove requirements to advertise licensing applications in local newspapers</b>	X		
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs for the on and off-trade</b>		X	
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs, but only in respect of overnight accommodation - lodges</b>	X		
<b>Remove or simplify requirements to renew personal licences under the 2003 Act</b>	X		

Score

0

Q43. 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
<b>Remove requirements to advertise licensing applications in local newspapers</b>	X		
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs for the on and off-trade</b>		X	
<b>Remove the centrally imposed prohibition on the</b>	X		

<b>sale of alcohol at MSAs, but only in respect of overnight accommodation - lodges</b>			
<b>Remove or simplify requirements to renew personal licences under the 2003 Act</b>	X		

Score

0

Q44. 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.

	Yes	No	Don't know
<b>Remove requirements to advertise licensing applications in local newspapers</b>		X	
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs for the on and off-trade</b>		X	
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs, but only in respect of overnight accommodation - lodges</b>	X		
<b>Remove or simplify requirements to renew personal licences under the 2003 Act</b>		X	

Score

0

Q45. 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 keep your views to a maximum of 200 words.)

**No Response**

Page Score

0

## Page 16: Impact assessments

Q46. Impact assessments for the proposals in this consultation have been published alongside the full consultation document. 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.

**No Response**

Score

0

Q47. Do you have any comments on the methodologies or assumptions

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

*No Response*

Page Score

0

## Scoring Summary

Pages	Total
1. About you	0
2. A minimum unit price for alcohol	0
3. A minimum unit price for alcohol	0
4. A ban on multi-buy promotions in the off-trade	0
5. A ban on multi-buy promotions in the off-trade	0
6. Reviewing the mandatory licensing conditions	0
7. Reviewing the mandatory licensing conditions	0
8. Health as a licensing objective for cumulative impact policies	0
9. Health as a licensing objective for cumulative impact policies	0
10. Freeing up responsible businesses	0
11. Freeing up responsible businesses	0
12. Freeing up responsible businesses	0
13. Freeing up responsible businesses	0
14. Freeing up responsible businesses	0
15. Freeing up responsible businesses	0
16. Impact assessments	0
<b>Total Survey Score:</b>	<b>0</b>

# Alcohol strategy consultation

User Details - 5420009

**Date Started:** 29/01/2013 14:33:41      **Date Ended:** 05/02/2013 09:59:44

**Time taken:** 163 hrs, 26 mins, 3 secs      **IP Address:** n/a

**Unique ID:** n/a

## Page 1: About you

Q1. Please select if you would like your response or personal details to be treated as confidential.

*No Response*

Score

0

Q2. Which of the following best describes you or the professional interest you represent? Please select one option from the menu below.

Licensing authority

***Please specify which organisation, licensing authority or police force you represent in the box below:***

Cheshire West and Chester Borough Council

Score

0

Q3. If you are responding on behalf of an organisation or interest group, please write in the box below the number of members in your group or organisation.

*No Response*

Q4. How did you obtain the views of your members? Please explain in the box below keeping your response to a maximum of 100 words.

We sent out a briefing note to members and senior officers; individual responses were collated.

Q5. Please indicate in which region you or your organisation is based. Please select one option from the menu below.

North West England

Score

0

Q6. If you are responding as a member of the public, what is your gender? Please select one option.

*No Response*

Score

0

Q7. If you are responding as a member of the public, what is your age?  
Please select one option.

**No Response**

Score

0

Page Score

0

## Page 2: A minimum unit price for alcohol

Q8. In the alcohol strategy, the government committed to introducing a minimum unit price for alcohol in England and Wales. This consultation will contribute to the debate on the most appropriate price per unit and the mechanism by which, once set, minimum unit pricing would remain effective. It is also an opportunity for interested parties to raise other issues around minimum unit pricing. The purpose of minimum unit pricing is to reduce alcohol consumption, particularly by the most hazardous and harmful drinkers who tend to show a preference for the cheapest alcohol products. By doing so the government estimates there will be a reduction in the associated crime and health harms, especially the numbers of hospital admissions, alcohol-related deaths and alcohol-related crimes. Minimum unit pricing is not intended disproportionately to affect responsible drinkers or particular social groups but to reduce the availability of alcohol sold at very low or heavily discounted prices. More information (including the definitions of hazardous and harmful drinkers) is available in the full consultation document and the impact assessment. Do you want to answer questions on minimum unit pricing? Please select one option.

Yes

Score

0

Page Score

0

## Page 3: A minimum unit price for alcohol

Q9. The impact of minimum unit pricing will depend on the price per unit of alcohol. The government wants to ensure that the chosen price level is targeted and proportionate, whilst achieving a significant reduction of harm. The government is therefore consulting on the introduction of a recommended minimum unit price of 45p. The government estimates a reduction in consumption across all product types of 3.3 per cent, a reduction in crime of 5,240 per year, a reduction in 24,600 alcohol-related hospital admissions and 714 fewer deaths per year after ten years. Do you agree that this minimum unit price level would achieve these aims? Please select one option.

No

***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):***

WE would refer 50p as MUP.

Score

0

Q10. Should other factors or evidence be considered when setting a minimum unit price for alcohol? Please select one option.

No

Score

0

Q11. The government wishes to maintain the effectiveness of minimum unit pricing and is therefore proposing to adjust the minimum unit price level over time. 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

Score

0

Q12. 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.

No

Score

0

Page Score

0

## Page 4: A ban on multi-buy promotions in the off-trade

Q13. The government is consulting on introducing a ban on multi-buy promotions in the off-trade (e.g. shops and off-licences) as part of its wider strategy to reduce excessive alcohol consumption, and alongside the introduction of a minimum unit price. A ban on multi-buy promotions would therefore not apply to pubs, clubs, bars or restaurants. The term 'multi-buy promotions' refers to alcohol promotions that offer a discount for buying multiple items. 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. As well as being part of a wider strategy to reduce consumption and tackle irresponsible alcohol sales, a ban on multi-buy promotions would also contribute to the government's aim of encouraging people to be aware of how much they drink and the risks of excessive drinking, so that they can make informed choices. The aim of this consultation is to assess support for such a ban and contribute to our understanding of the impact a ban on multi-buy promotions may have. The types of promotion it is proposed that a ban would include, are: two for the price of one, three for the price of two, buy one get one free, buy six and get 20

per cent off 24 cans of lager costing less than 24 times the cost of a single can of lager in the shop or a case of wine sold cheaper than the individual price at which the same bottles are sold in the shop for £10 where each bottle costs more than £3.33. More information is available in the full consultation document and the impact assessment. Do you want to answer questions on a ban on multi-buy promotions in the off-trade? Please select one option.

Yes

Score

0

Page Score

0

## Page 5: A ban on multi-buy promotions in the off-trade

Q14. Do you think there should be a ban on multi-buy promotions involving alcohol in the off-trade? Please select one option.

Yes

Score

0

Q15. Are there any further offers which should be included in a ban on multi-buy promotions? Please select one option.

Don't know

Score

0

Q16. Should other factors or evidence be taken into account when considering a ban on multi-buy promotions? Please select one option.

Don't know

Score

0

Q17. 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.

No

Score

0

Page Score

0

## Page 6: Reviewing the mandatory licensing conditions

Q18. 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 alcohol 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. The government has also committed to consult on whether these mandatory licensing conditions should, where relevant, apply to both the on- and off-trade. This consultation forms part of that review, and will contribute to the government's understanding of how these mandatory conditions are perceived. The five mandatory licensing conditions currently set out in regulations in relation to the supply of alcohol are: a ban on irresponsible promotions a ban on dispensing alcohol by one person directly into the mouth of another a requirement to provide free tap water on request to customers a requirement to have an age verification policy to prevent the sale of alcohol to persons under 18 years of age, and a requirement to make available to customers small measures such as half pints or beer or cider or 125ml glasses of wine More information is available in the full consultation document. An explanation of each of these terms can be found on page 20 of the consultation document, in the glossary at the end. Do you want to answer questions on reviewing the mandatory licensing conditions? Please select one option.

Yes

Score

0

Page Score

0

## Page 7: Reviewing the mandatory licensing conditions

Q19. Do you think each of the mandatory licensing conditions is effective in promoting the licensing objectives? For more information on the licensing objectives please see the glossary at the end of the full consultation document. Please select one option (Yes, No, Don't know) from each drop down menu.

	<b>Prevention of crime and disorder</b>	<b>Public safety</b>	<b>Prevention of public nuisance</b>	<b>Protection of children from harm</b>
<b>Irresponsible promotions</b>	Don't know	Don't know	Don't know	Don't know
<b>Dispensing alcohol directly into the mouth</b>	Don't know	Don't know	Don't know	Don't know
<b>Mandatory provision of free tap water</b>	Don't know	Don't know	Don't know	Don't know
<b>Age verification policy</b>	Yes	Yes	Yes	Yes

<b>Mandatory provision of small measures</b>	No	No	No	No
--	----	----	----	----

Score

0

Q20. Do you think that the mandatory licensing conditions do enough to target irresponsible promotions in pubs and clubs? Please select one option.

No

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

The wording needs to be amended &quot; significant risk&quot; of contravening licensing objectives by leading or contributing to crime and disorder, we believe the test is too high.

Score

0

Q21. Are there other issues related to the licensing objectives which could be tackled through a mandatory licensing condition? Please select one option.

No

Score

0

Q22. Do you think that 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.

No

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

The only on condition 4 applying to off trade is age verification. We believe drinks promotions should apply to off sales.

Score

0

Page Score

0

## **Page 8: Health as a licensing objective for cumulative impact policies**

Q23. We want to ensure that licensing authorities are able to take alcohol-related health harms into consideration when making decisions about cumulative impact policies (CIPs) which can be used to manage problems linked to the density of premises in specific areas. 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. We are proposing 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. We expect that those areas with the highest levels of alcohol-related health harm, or fast rising levels of harm from alcohol, will be most likely to use this power. It 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. More information is available in the full consultation document and impact assessment. Do you want to answer questions on health as a licensing objective for cumulative impact policies? Please select one option.

Yes

Score

0

Page Score

0

## Page 9: Health as a licensing objective for cumulative impact policies

Q24. 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):

Data from A&E departments; medical centres in specific areas near problem premises and Police custody units

Q25. 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

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

amende to allow for collection of data and for such information to be included.

Score

0

Q26. 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 your answer in the box below, providing evidence to support your response (keeping your views to a maximum of 200 words):

it would allow us to take into account localised health issues to influence a decision to introduce CIP.

Page Score

0

## Page 10: Freeing up responsible businesses

Q27. The government has committed to consult on giving licensing authorities greater freedom to take decisions that reflect the needs of their local community. Following the government's Red Tape Challenge in 2011, three areas of reform were specified: alcohol licensing for certain types of premises providing minimal alcohol sales, temporary event notices (TENs) and the licensing of late night refreshment. This section asks for views on these proposals and suggests further ways to reduce burdens on business. The proposals set out here can be seen alongside work undertaken by the Department for Culture, Media and Sport to remove unnecessary red tape from regulated entertainment. More information on each of these areas for reform is available in the full consultation document. There are five subjects covered in this section. They are: ancillary sales of alcohol, occasional provision of licensable activities at community events, an extension of the temporary event notice limit at individual premises, late night refreshment, and further proposals to reduce burdens on business. Do you want to answer questions on freeing up responsible businesses? Please select one option.

Yes

Score

0

Page Score

0

## Page 11: Freeing up responsible businesses

Q28. Ancillary sales of alcohol For many businesses, the sale of alcohol is only a small part of, or incidental to, their wider activities, and occurs alongside the provision of another product or service (which this consultation refers to as an 'ancillary sale'). For example, a guesthouse might wish to provide wine to its guests with an evening meal or a complimentary bottle of wine in a guest's room, while a hairdresser might wish to offer clients a glass of wine. 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
<b>The provision should be limited to a specific list of certain types of business and the kinds of sales they make</b>	X		
<b>The provision should be available to all businesses providing they meet certain qualification criteria to be an ancillary seller</b>		X	

<b>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 the above options</b>		X	
--	--	---	--

Score

0

Q29. If special provisions 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.

	Yes	No	Don't know
<b>Accommodation providers, providing alcohol alongside accommodation as part of the contract</b>		X	
<b>Hair and beauty salons, providing alcohol alongside a hair or beauty treatment</b>		X	
<b>Florists, providing alcohol alongside the purchase of flowers</b>		X	
<b>Cultural organisations, such as theatres, cinemas and museums, providing alcohol alongside cultural events as part of the entry ticket</b>		X	
<b>Regular charitable events, providing alcohol as part of the wider occasion</b>		X	

Score

0

Q30. 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 suggestions in the box below, keeping your views to a maximum of 200 words:

The current regime is sufficiently light touch to accomodate these premises.

Q31. 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. Alternatively, a second option is to broaden the definition of 'ancillary sales' to include all businesses (and/or not for profit activities) through the use of a general set of qualification criteria, for example, to the effect that: alcohol must be sold or supplied as a small part or proportion of a sales transaction or contract for a wider service, and the amount of alcohol that could be supplied as part of that contract cannot exceed a prescribed amount Do you think that the qualification criteria

proposed meet this aim?

No

Score

0

Q32. 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
<b>Allow premises making ancillary sales to request in their premises licence application that the requirement for a personal licence holder be removed</b>	X		
<b>Introduce a new, light-touch form of authorisation for premises making ancillary sales - an ASN but retaining the need for a personal licence holder</b>		X	
<b>Introduce a new, light touch form of authorisation for premises making ancillary sales - an ASN - with no requirement for a personal licence holder</b>		X	

Score

0

Q33. Do you think these proposals would impact adversely on one or more of the licensing objectives? Please select one option.

	Yes	No	Don't know
<b>Allow premises making ancillary sales to request in their premises licence application that the requirement for a personal licence holder be removed</b>		X	
<b>Introduce a new, light-touch form of authorisation for premises making ancillary sales - an ASN but retaining the need for a personal licence holder</b>		X	
<b>Introduce a new, light touch form of authorisation for premises making ancillary sales - an ASN - with no requirement for a personal licence holder</b>	X		

Score

0

Q34. 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 response to a maximum of 200 words:

*No Response*

Page Score

0

## Page 12: Freeing up responsible businesses

Q35. 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

Score

0

Q36. 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
Reduce the burden	X		
Increase the burden			

Score

0

Page Score

0

## Page 13: Freeing up responsible businesses

Q37. Should the number of TENs which can be given in respect of individual premises be increased? Please select one option.

Yes

Score

0

Q38. If you answered yes, please select one option to indicate which you would prefer. Please select one option.

18

Score

0

Page Score

0

## Page 14: Freeing up responsible businesses

Q39. 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
Determining that premises in certain areas are exempt		X	

<b>Determining that certain premises types are exempt in their local area</b>		X	
---	--	---	--

Score

0

Q40. 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

Score

0

Q41. 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).

**No Response**

Page Score

0

## Page 15: Freeing up responsible businesses

Q42. Do you agree with each of the following proposals? Please select one option in each row.

	Yes	No	Don't know
<b>Remove requirements to advertise licensing applications in local newspapers</b>	X		
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs for the on and off-trade</b>		X	
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs, but only in respect of overnight accommodation - lodges</b>	X		
<b>Remove or simplify requirements to renew personal licences under the 2003 Act</b>	X		

Score

0

Q43. 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
<b>Remove requirements to advertise licensing applications in local newspapers</b>	X		
<b>Remove the centrally imposed prohibition on the</b>	X		

<b>sale of alcohol at MSAs for the on and off-trade</b>			
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs, but only in respect of overnight accommodation - lodges</b>	X		
<b>Remove or simplify requirements to renew personal licences under the 2003 Act</b>	X		

Score

0

Q44. 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.

	Yes	No	Don't know
<b>Remove requirements to advertise licensing applications in local newspapers</b>		X	
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs for the on and off-trade</b>	X		
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs, but only in respect of overnight accommodation - lodges</b>		X	
<b>Remove or simplify requirements to renew personal licences under the 2003 Act</b>		X	

Score

0

Q45. 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 keep your views to a maximum of 200 words.)

*No Response*

Page Score

0

## Page 16: Impact assessments

Q46. Impact assessments for the proposals in this consultation have been published alongside the full consultation document. 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
Minimum unit pricing			X
Multi-buy promotions			X
Health as a licensing objective for cumulative impact			X
Ancillary sales of alcohol			X
Temporary event notices			X
Late night refreshment			X
Removing the duty to advertise licence applications in a local newspaper			X
Sales of alcohol at motorway service stations			X
Personal licences			X

Score

0

Q47. Do you have any comments on the methodologies or assumptions used in the impact assessments? If yes, please specify in the box below, clearly referencing the impact assessment and page to which you refer (keeping your views to a maximum of 400 words).

*No Response*

Page Score

0

## Scoring Summary

Pages	Total
1. About you	0
2. A minimum unit price for alcohol	0
3. A minimum unit price for alcohol	0
4. A ban on multi-buy promotions in the off-trade	0
5. A ban on multi-buy promotions in the off-trade	0

6. Reviewing the mandatory licensing conditions	0
7. Reviewing the mandatory licensing conditions	0
8. Health as a licensing objective for cumulative impact policies	0
9. Health as a licensing objective for cumulative impact policies	0
10. Freeing up responsible businesses	0
11. Freeing up responsible businesses	0
12. Freeing up responsible businesses	0
13. Freeing up responsible businesses	0
14. Freeing up responsible businesses	0
15. Freeing up responsible businesses	0
16. Impact assessments	0
<b>Total Survey Score:</b>	<b>0</b>

# Alcohol strategy consultation

User Details - 5461748

**Date Started:** 05/02/2013 10:01:30    **Date Ended:** 05/02/2013 10:19:39

**Time taken:** 18 mins, 9 secs    **IP Address:** n/a

**Unique ID:** n/a

## Page 1: About you

Q1. Please select if you would like your response or personal details to be treated as confidential.

Treat as confidential

Score

0

Q2. Which of the following best describes you or the professional interest you represent? Please select one option from the menu below.

Local government (other)

***Please specify which organisation, licensing authority or police force you represent in the box below:***

Durham County Council

Score

0

Q3. If you are responding on behalf of an organisation or interest group, please write in the box below the number of members in your group or organisation.

***No Response***

Q4. How did you obtain the views of your members? Please explain in the box below keeping your response to a maximum of 100 words.

***No Response***

Q5. Please indicate in which region you or your organisation is based.

Please select one option from the menu below.

North East England

Score

0

Q6. If you are responding as a member of the public, what is your gender?

Please select one option.

***No Response***

Score

0

Q7. If you are responding as a member of the public, what is your age?

Please select one option.

No Response

Score

0

Page Score

0

## Page 2: A minimum unit price for alcohol

Q8. In the alcohol strategy, the government committed to introducing a minimum unit price for alcohol in England and Wales. This consultation will contribute to the debate on the most appropriate price per unit and the mechanism by which, once set, minimum unit pricing would remain effective. It is also an opportunity for interested parties to raise other issues around minimum unit pricing. The purpose of minimum unit pricing is to reduce alcohol consumption, particularly by the most hazardous and harmful drinkers who tend to show a preference for the cheapest alcohol products. By doing so the government estimates there will be a reduction in the associated crime and health harms, especially the numbers of hospital admissions, alcohol-related deaths and alcohol-related crimes. Minimum unit pricing is not intended disproportionately to affect responsible drinkers or particular social groups but to reduce the availability of alcohol sold at very low or heavily discounted prices. More information (including the definitions of hazardous and harmful drinkers) is available in the full consultation document and the impact assessment. Do you want to answer questions on minimum unit pricing? Please select one option.

Yes

Score

0

Page Score

0

## Page 3: A minimum unit price for alcohol

Q9. The impact of minimum unit pricing will depend on the price per unit of alcohol. The government wants to ensure that the chosen price level is targeted and proportionate, whilst achieving a significant reduction of harm. The government is therefore consulting on the introduction of a recommended minimum unit price of 45p. The government estimates a reduction in consumption across all product types of 3.3 per cent, a reduction in crime of 5,240 per year, a reduction in 24,600 alcohol-related hospital admissions and 714 fewer deaths per year after ten years. Do you agree that this minimum unit price level would achieve these aims? Please select one option.

Yes

***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 is key priority for our Authority now and in the future when public health functions are transferred over to us. Alcohol impacts upon almost

every service we provide within the Council and costs our tax payers almost £900 each year. We support the implementation of a minimum unit price as a targeted and proportionate approach in reducing alcohol related harms. MUP set at an adequate level will impact most on higher risk and younger drinkers who access our services locally. Having looked at the independent evidence from the University of Sheffield we believe that MUP of at least 50p would be the preferred level. The additional 5p to save an extra 1,000 deaths; 31,000 alcohol-related hospital admissions; 18,000 crimes and reduce consumption by a further 2.4% a year is a price we would be willing to pay. The Association of North East Council's Leaders' support MUP set at 50p. The Faculty of Public Health supported the MUP of 50p as is our own Director of Public Health. Although concern has been expressed by our enforcement arm about how MUP would be 'policed' we feel that the level of 50p would be easier to enforce than alternative levels of MUP.

Score

0

Q10. Should other factors or evidence be considered when setting a minimum unit price for alcohol? Please select one option.

Yes

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

The North-East proximity to Scotland where MUP of 50p is to be introduced. Additional revenue made through MUP needs to be effectively channelled into local areas to further reduce alcohol harms. MUP should be set at no less than 50p per unit, and regularly reviewed to ensure alcohol does not become more affordable. We estimate between 38% and 65% of the population in County Durham is drinking at harmful levels. Targeted action at a population level needs to be taken to turn back this tide. County Durham has the 13th highest rate of under-18 alcohol specific hospital admissions in England. Evidence from Sheffield University indicates that a minimum unit price set at 50p would result in larger reductions in alcohol consumption amongst this group. 57% of people in County Durham support MUP - this increases if it reduces drunk and rowdy behaviour – which evidence suggests it would. Alcohol costs County Durham over £189 million a year this equates to the savings DCC has to save over the next 5 years. Alcohol is cited as a factor in over a third of all initial child protection conferences in County Durham. Community pubs are closing – they can't compete with supermarket prices

Score

0

Q11. The government wishes to maintain the effectiveness of minimum unit pricing and is therefore proposing to adjust the minimum unit price level over time. 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 automatically be updated in line with inflation each year

Score

0

Q12. 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

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

A 50p MUP would: save local services time and money in dealing with excessive alcohol use and misuse, delay the age young people start to drink and reduce consumption for those who already drink, reduce alcohol-related risk taking behaviour amongst young people and its consequences, reduce alcohol consumption in the home reducing the number of young people exposed to parental alcohol use, misuse and child protection proceedings, help to turn the tide on domestic abuse – over 40% of cases currently are linked to alcohol, result in fewer victims of crime and anti-social behaviour

Score

0

Page Score

0

## **Page 4: A ban on multi-buy promotions in the off-trade**

Q13. The government is consulting on introducing a ban on multi-buy promotions in the off-trade (e.g. shops and off-licences) as part of its wider strategy to reduce excessive alcohol consumption, and alongside the introduction of a minimum unit price. A ban on multi-buy promotions would therefore not apply to pubs, clubs, bars or restaurants. The term 'multi-buy promotions' refers to alcohol promotions that offer a discount for buying multiple items. 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. As well as being part of a wider strategy to reduce consumption and tackle irresponsible alcohol sales, a ban on multi-buy promotions would also contribute to the government's aim of encouraging people to be aware of how much they drink and the risks of excessive drinking, so that they can make informed choices. The aim of this consultation is to assess support for such a ban and contribute to our understanding of the impact a ban on multi-buy promotions may have. The types of promotion it is proposed that a ban would include, are: two for the price of one, three for the price of two, buy one get one free, buy six and get 20 per cent off, 24 cans of lager costing less than 24 times the cost of a single 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 shop3 for £10 where each bottle costs more than £3.33 More information is available in the full consultation document and the impact assessment. Do you want to answer questions on a ban on multi-buy promotions in the off-trade? Please select one option.

Yes

Score

0

Page Score

0

## Page 5: A ban on multi-buy promotions in the off-trade

Q14. Do you think there should be a ban on multi-buy promotions involving alcohol in the off-trade? Please select one option.

Yes

Score

0

Q15. Are there any further offers which should be included in a ban on multi-buy promotions? Please select one option.

Yes

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

Alcohol can be a harmful and addictive substance and multi-buy promotions encourage people to buy and drink more than they would should the offer not be on. We believe that the ban of multi-buy promotions should not to be limited to the off trade as some on-licence premises still promote what we would term irresponsible drinks promotions. Any incentive to purchase or consume more than intended whether on or off licence should be prohibited as drinking to excess has significant consequences and impacts on our services.

Score

0

Q16. Should other factors or evidence be taken into account when considering a ban on multi-buy promotions? Please select one option.

Yes

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

Research by Sheffield University on behalf of the Scottish Government indicated that a ban on multi-buy promotions would increase the effectiveness of MUP. Cheap alcohol deals may result in young people drinking more, as highlighted in the Alcohol Concern and Balance Report 'Drinking to Get Drunk' in which 16-17 year-olds were quoted as saying that price promotions 'attracted young people to drink more than they would have' Reductions in consumption levels would improve health inequalities as health harms have a greater impact on lower income groups. For example, alcohol related deaths are 45% higher in areas of high

deprivation.

Score

0

Q17. 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

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

Young people – improved health, school attainment and reduced risk of becoming a victim or perpetrator of crime/ASB. People living in deprived areas - men are five times, and women three times, more likely to die from an alcohol related cause than those in the least deprived areas. Families - multi-buy deals encourage home drinking where excessive consumption is hidden and harder to control.

Score

0

Page Score

0

## **Page 6: Reviewing the mandatory licensing conditions**

Q18. 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 alcohol 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. The government has also committed to consult on whether these mandatory licensing conditions should, where relevant, apply to both the on- and off-trade. This consultation forms part of that review, and will contribute to the government's understanding of how these mandatory conditions are perceived. The five mandatory licensing conditions currently set out in regulations in relation to the supply of alcohol are: a ban on irresponsible promotionsa ban on dispensing alcohol by one person directly into the mouth of anothera requirement to provide free tap water on request to customersa requirement to have an age verification policy to prevent the sale of alcohol to persons under 18 years of age, anda requirement to make available to customers small measures such as half pints or beer or cider or 125ml glasses of wine More information is available in the full consultation document. An explanation of each of these terms can be found on page 20 of the consultation document, in the glossary at the end. Do you want to answer questions on reviewing the mandatory licensing conditions? Please select one option.

Yes

Score

0

Page Score

0

## Page 7: Reviewing the mandatory licensing conditions

Q19. Do you think each of the mandatory licensing conditions is effective in promoting the licensing objectives? For more information on the licensing objectives please see the glossary at the end of the full consultation document. Please select one option (Yes, No, Don't know) from each drop down menu.

	Prevention of crime and disorder	Public safety	Prevention of public nuisance	Protection of children from harm
Irresponsible promotions	Yes	Yes	Yes	Yes
Dispensing alcohol directly into the mouth	Yes	Yes	Yes	Yes
Mandatory provision of free tap water	Yes	Yes	Yes	Yes
Age verification policy	Yes	Yes	Yes	Yes
Mandatory provision of small measures	Yes	Yes	Yes	Yes

Score

0

Q20. Do you think that the mandatory licensing conditions do enough to target irresponsible promotions in pubs and clubs? Please select one option.

No

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

The definition of irresponsible promotions needs to be clarified. Treble measures of spirits or goldfish bowls of cocktails are irresponsible. The 35ml spirit measure should be withdrawn, leaving the 25ml single measure. Anything which encourages greater consumption should not be allowed, including: Price-based promotions Meal deals or voucher schemes 'drink

the bar dry' promotions organised pub crawls shots sold from a tray or dispensed from a tank at your table selling alcoholic drinks cheaper than an one without alcohol, i.e. vodka and coke vs coke alone The condition relating to the age verification policies should specify a written policy.

Score

0

Q21. Are there other issues related to the licensing objectives which could be tackled through a mandatory licensing condition? Please select one option.

Yes

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

Anyone selling alcohol should have to have a basic level of training and a personal license Age verification training The need to keep a refusals book Till prompts re: age verification (i.e. Challenge 25) Provision and promotion of lower strengths beers and wines Promotion – not simply provision – of small measures; active promotion of soft drinks Point of sale information should be made compulsory stipulating units of alcohol and the recommended limits together with health harms. No under-18 events allowed on licensed premises. No children allowed on licensed establishments that are only for the purpose of alcohol consumption.

Score

0

Q22. Do you think that 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.

No

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

The current approach is not appropriate. Alcohol problems are increasingly associated with cheap alcohol sold from off licences. Research consistently points to more alcohol being purchased from supermarkets and more consumed at home. There is no control over the amount people drink or their behaviour behind closed doors. This has significant consequences not only in terms of health but also ease of access to alcohol for young people. We know pre-loading is a problem. We also know that people who have pre-loaded before they go out are more likely to be a victim or perpetrator of crime.

Score

0

Page Score

0

## **Page 8: Health as a licensing objective for cumulative impact policies**

Q23. We want to ensure that licensing authorities are able to take alcohol-

related health harms into consideration when making decisions about cumulative impact policies (CIPs) which can be used to manage problems linked to the density of premises in specific areas. 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. We are proposing 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. We expect that those areas with the highest levels of alcohol-related health harm, or fast rising levels of harm from alcohol, will be most likely to use this power. It 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. More information is available in the full consultation document and impact assessment. Do you want to answer questions on health as a licensing objective for cumulative impact policies? Please select one option.

Yes

Score

0

Page Score

0

## Page 9: Health as a licensing objective for cumulative impact policies

Q24. 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):

We believe that public health should be a licensing objective in its own right and not tied to CIPs. This is especially important with the local authority taking on public health functions from April 2013. The local authority need to be able to take a holistic approach to the issue of alcohol. We do not accept that it would be disproportionate to consider public health as a licensing objective because the alcohol industry is already taking action as part of the Responsibility Deal as previous agreements, such as alcohol labelling have come to little effect.

Available data includes:

- Accident and Emergency data
- Ambulance data
- Alcohol specific hospital admissions
- Alcohol attributable hospital admissions

- Under 18 admissions
- Liver and other alcohol related deaths
- Domestic abuse, sexual violence and child protection data
- Local data sources, e.g. residents' surveys.

We acknowledge that it is difficult to tie public health data to a specific licensed premise, particularly an off licence.

Q25. 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

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

The evidential basis for a CIP would need to be extended to enable consideration of public health issues as a basis for a CIP. Without a specific licensing objective in relation to public health we would encourage the Government to see public health as including public safety issues e.g. accident data and enable health data to be used alongside other data (not specifically linked to crime and disorder) to determine where/whether a CIP would be appropriate for a certain area.

Score

0

Q26. 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 your answer in the box below, providing evidence to support your response (keeping your views to a maximum of 200 words):

Alcohol-related health data should be used where appropriate in all licensing policy making decisions not just that of a CIP. Introducing public health data to support a CIP would enable licensing decisions to be made taking into account the full impact of alcohol related harm and health inequalities in an area. It would ensure that Licensing Committees are able to consider not only the perceived benefits for culture and leisure that alcohol brings but also the health inequalities and disadvantages alcohol brings to communities and enable them to make a full evidence based assessment on the necessity of any new licence.

Page Score

0

## **Page 10: Freeing up responsible businesses**

Q27. The government has committed to consult on giving licensing authorities greater freedom to take decisions that reflect the needs of their local community. Following the government's Red Tape Challenge in 2011, three areas of reform were specified: alcohol licensing for certain types of premises providing minimal alcohol sales, temporary event notices (TENs) and the licensing of late night refreshment. This section asks for views on

these proposals and suggests further ways to reduce burdens on business. The proposals set out here can be seen alongside work undertaken by the Department for Culture, Media and Sport to remove unnecessary red tape from regulated entertainment. More information on each of these areas for reform is available in the full consultation document. There are five subjects covered in this section. They are: ancillary sales of alcohol, occasional provision of licensable activities at community events, an extension of the temporary event notice limit at individual premises, late night refreshment, and further proposals to reduce burdens on business. Do you want to answer questions on freeing up responsible businesses? Please select one option.

Yes

Score

0

Page Score

0

## Page 11: Freeing up responsible businesses

Q28. Ancillary sales of alcohol For many businesses, the sale of alcohol is only a small part of, or incidental to, their wider activities, and occurs alongside the provision of another product or service (which this consultation refers to as an 'ancillary sale'). For example, a guesthouse might wish to provide wine to its guests with an evening meal or a complimentary bottle of wine in a guest's room, while a hairdresser might wish to offer clients a glass of wine. 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.

**No Response**

Score

0

Q29. If special provisions 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.

	Yes	No	Don't know
<b>Accommodation providers, providing alcohol alongside accommodation as part of the contract</b>		X	
<b>Hair and beauty salons, providing alcohol alongside a hair or beauty treatment</b>		X	
<b>Florists, providing alcohol alongside the purchase of flowers</b>		X	
<b>Cultural organisations, such as theatres, cinemas</b>		X	

<b>and museums, providing alcohol alongside cultural events as part of the entry ticket</b>			
<b>Regular charitable events, providing alcohol as part of the wider occasion</b>		X	

Score

0

Q30. 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 suggestions in the box below, keeping your views to a maximum of 200 words:

We profoundly disagree with the need for 'freeing up the burdens on businesses' to make it easier to sell alcohol.

The WHO states that, 'An increased density of alcohol outlets is associated with increased levels of alcohol consumption among young people, increased levels of assault, and other harm such as homicide, child abuse and neglect, self-inflicted injury and, with less consistent evidence, road traffic accidents.'

This proposal will increase the availability of, and further cement pro-normal attitudes to, alcohol. It will increase personal and social harm and worsen health inequalities. It will say to our children that alcohol has to be a central part of adult life.

The 'ancillary license' provisions contradict the measures in the Police Reform and Social Responsibility Act giving local people greater power to restrict the availability of alcohol in their neighbourhoods. How would they have their say on ancillary licenses?

While these proposals may reduce the burden on business, it will increase the costs and stresses on already stretched and shrinking public services. There are significant dangers of loopholes should such changes be introduced.

Q31. 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. Alternatively, a second option is to broaden the definition of 'ancillary sales' to include all businesses (and/or not for profit activities) through the use of a general set of qualification criteria, for example, to the effect that: alcohol must be sold or supplied as a small part or proportion of a sales transaction or contract for a wider service, and the amount of alcohol that could be supplied as part of that contract cannot exceed a prescribed amount Do you think that the qualification criteria

proposed meet this aim?

No

***Please use the space below to provide further comments (keeping your views to a maximum of 200 words):***

Alcohol can be a dangerous, harmful and addictive substance. Simply because it is legal does not mean that it should not have adequate safeguards and controls over its sale. A sale of alcohol is a sale of alcohol no matter how big or small. This provision represents a real risk that alcohol becomes even more socially acceptable and fails to take into account the negative impact it has on society in terms of health harms, crime and disorder and wider societal and economic issues. There is serious concern within our licensing enforcement teams with regard to whom and how premises would be investigated to ensure that they are still eligible to be classed as an ancillary seller. At times of austerity and job cuts, why should a reduction in bureaucracy for businesses have to result in an increased workload and therefore increased cost for local authorities and the local tax payer?

Score

0

Q32. Do you think that these proposals would significantly reduce the burdens on ancillary sellers? Please select one option in each row.

**No Response**

Score

0

Q33. Do you think these proposals would impact adversely on one or more of the licensing objectives? Please select one option.

	Yes	No	Don't know
<b>Allow premises making ancillary sales to request in their premises licence application that the requirement for a personal licence holder be removed</b>	X		
<b>Introduce a new, light-touch form of authorisation for premises making ancillary sales - an ASN but retaining the need for a personal licence holder</b>	X		
<b>Introduce a new, light touch form of authorisation for premises making ancillary sales - an ASN - with no requirement for a personal licence holder</b>	X		

Score

0

Q34. 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 response to a maximum of 200 words:

There needs to be accountability for selling a substance which is potentially addictive and which, in comparison to illegal drugs causes far greater numbers of deaths. Someone who sells alcohol needs adequate training in the licensing objectives. Who would be responsible for ensuring alcohol is not sold to children or people who are already intoxicated or that training is provided to staff?

Community premises, who already benefit from a light touch approach, are non-profit making. The proposed ancillary sellers are businesses. At a time when businesses are under pressure, there would be a temptation to make alcohol a more important part of their offer to customers.

We have significant concerns that the legislation would provide loopholes for irresponsible businesses to abuse.

Local communities need to be able to shape their neighbourhood. Removing the need to advertise contradicts the Rebalancing the Licensing Act and undermines the powers given to local people through that legislation.

The proposal to withdraw the annual fee for ancillary sellers is a concern. There would still be administrative tasks associated with ancillary sellers and therefore it would be difficult for licensing authorities to maintain cost neutrality. There would be associated costs but no reciprocal income.

Page Score

0

## Page 12: Freeing up responsible businesses

Q35. 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.

No

Score

0

Q36. 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
Reduce the burden			X
Increase the burden			X

Score

0

Page Score

0

## Page 13: Freeing up responsible businesses

Q37. Should the number of TENs which can be given in respect of individual premises be increased? Please select one option.

No

Score

0

Q38. If you answered yes, please select one option to indicate which you would prefer. Please select one option.

*No Response*

Score

0

Page Score

0

## Page 14: Freeing up responsible businesses

Q39. 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
<b>Determining that premises in certain areas are exempt</b>		X	
<b>Determining that certain premises types are exempt in their local area</b>		X	

Score

0

Q40. 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

Score

0

Q41. 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).

None – the World Health Organisation states that one of the key ways to reduce alcohol harm is to control the availability of alcohol. Alcohol is more available than ever before. It is available 24 hours a day, seven days a week and dial a drink services mean it can even be delivered to your door. The suggestions laid out here risk compounding the errors made in trying to create a so called 'café/24 hour drinking culture'.

Page Score

0

## Page 15: Freeing up responsible businesses

Q42. Do you agree with each of the following proposals? Please select one option in each row.

	Yes	No	Don't know
<b>Remove requirements to advertise licensing applications in local newspapers</b>		X	
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs for the on and off-trade</b>		X	
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs, but only in respect of overnight accommodation - lodges</b>		X	
<b>Remove or simplify requirements to renew personal licences under the 2003 Act</b>		X	

Score

0

Q43. Do you think that each of the following would reduce the overall burdens on business? Please select one option in each row.

*No Response*

Score

0

Q44. 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.

	Yes	No	Don't know
<b>Remove requirements to advertise licensing applications in local newspapers</b>	X		
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs for the on and off-trade</b>	X		
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs, but only in respect of overnight accommodation - lodges</b>	X		
<b>Remove or simplify requirements to renew personal licences under the 2003 Act</b>	X		

Score

0

Q45. 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 keep your views to a maximum of 200 words.)

We do not believe that any processes under the 2003 Act should be removed. We feel that the TENs process is sufficiently light touch for businesses.

We do feel that once local authorities are able to set their own fees the Licensing Authority could take some of the burden away from the applicant in relation to advertising on their behalf.

We also feel that the development of a national database for personal license holders would considerably help both local authorities and license holders. We also believe that personal license holders should have to undertake refresher training of legislation, policy etc and CRB checks at least every 5 years.

Page Score

0

## Page 16: Impact assessments

Q46. Impact assessments for the proposals in this consultation have been published alongside the full consultation document. 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
<b>Minimum unit pricing</b>			X
<b>Multi-buy promotions</b>			X
<b>Health as a licensing objective for cumulative impact</b>			X
<b>Ancillary sales of alcohol</b>			X
<b>Temporary event notices</b>			X
<b>Late night refreshment</b>			X
<b>Removing the duty to advertise licence applications in a local newspaper</b>			X
<b>Sales of alcohol at motorway service stations</b>			X
<b>Personal licences</b>			X

Score

0

Q47. Do you have any comments on the methodologies or assumptions used in the impact assessments? If yes, please specify in the box below, clearly referencing the impact assessment and page to which you refer (keeping your views to a maximum of 400 words).

*No Response*

Page Score

0

## Scoring Summary

Pages	Total
1. About you	0
2. A minimum unit price for alcohol	0
3. A minimum unit price for alcohol	0
4. A ban on multi-buy promotions in the off-trade	0
5. A ban on multi-buy promotions in the off-trade	0
6. Reviewing the mandatory licensing conditions	0
7. Reviewing the mandatory licensing conditions	0
8. Health as a licensing objective for cumulative impact policies	0
9. Health as a licensing objective for cumulative impact policies	0
10. Freeing up responsible businesses	0
11. Freeing up responsible businesses	0
12. Freeing up responsible businesses	0
13. Freeing up responsible businesses	0
14. Freeing up responsible businesses	0
15. Freeing up responsible businesses	0

16. Impact assessments	0
<b>Total Survey Score:</b>	0

# Alcohol strategy consultation

User Details - 5356245

**Date Started:** 16/01/2013 11:16:40      **Date Ended:** 05/02/2013 10:40:18

**Time taken:** 479 hrs, 23 mins, 38 secs   **IP Address:** n/a

**Unique ID:** n/a

## Page 1: About you

Q1. Please select if you would like your response or personal details to be treated as confidential.

*No Response*

Score

0

Q2. Which of the following best describes you or the professional interest you represent? Please select one option from the menu below.

Police force

***Please specify which organisation, licensing authority or police force you represent in the box below:***

Surrey Police

Score

0

Q3. If you are responding on behalf of an organisation or interest group, please write in the box below the number of members in your group or organisation.

*No Response*

Q4. How did you obtain the views of your members? Please explain in the box below keeping your response to a maximum of 100 words.

*No Response*

Q5. Please indicate in which region you or your organisation is based. Please select one option from the menu below.

*No Response*

Score

0

Q6. If you are responding as a member of the public, what is your gender? Please select one option.

*No Response*

Score

0

Q7. If you are responding as a member of the public, what is your age? Please select one option.

No Response

Score

0

Page Score

0

## Page 2: A minimum unit price for alcohol

Q8. In the alcohol strategy, the government committed to introducing a minimum unit price for alcohol in England and Wales. This consultation will contribute to the debate on the most appropriate price per unit and the mechanism by which, once set, minimum unit pricing would remain effective. It is also an opportunity for interested parties to raise other issues around minimum unit pricing. The purpose of minimum unit pricing is to reduce alcohol consumption, particularly by the most hazardous and harmful drinkers who tend to show a preference for the cheapest alcohol products. By doing so the government estimates there will be a reduction in the associated crime and health harms, especially the numbers of hospital admissions, alcohol-related deaths and alcohol-related crimes. Minimum unit pricing is not intended disproportionately to affect responsible drinkers or particular social groups but to reduce the availability of alcohol sold at very low or heavily discounted prices. More information (including the definitions of hazardous and harmful drinkers) is available in the full consultation document and the impact assessment. Do you want to answer questions on minimum unit pricing? Please select one option.

Yes

Score

0

Page Score

0

## Page 3: A minimum unit price for alcohol

Q9. The impact of minimum unit pricing will depend on the price per unit of alcohol. The government wants to ensure that the chosen price level is targeted and proportionate, whilst achieving a significant reduction of harm. The government is therefore consulting on the introduction of a recommended minimum unit price of 45p. The government estimates a reduction in consumption across all product types of 3.3 per cent, a reduction in crime of 5,240 per year, a reduction in 24,600 alcohol-related hospital admissions and 714 fewer deaths per year after ten years. Do you agree that this minimum unit price level would achieve these aims? Please select one option.

Yes

***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):***

The introduction of a minimum unit price for alcohol of 45p is strongly supported. However, a level of 50p would be markedly more effective in

reducing consumption and thus reducing alcohol related crime and disorder, saving the police service an estimated £49.6 m in the first year. Research (supported by BMA findings) has identified that a level of 50p would be needed to reduce the number of hazardous and harmful drinkers. A 50p per unit price would not affect the vast majority of drinks sold through on-licence premises although it would prevent irresponsible promotions. It is however, strongly believed that any cost increase would affect the quantity of alcohol bought cheaply at supermarkets for the purpose of pre-loading. It is difficult to imagine how further reductions in alcohol related violent crime, disorder and anti-social behaviour can be made should supermarkets continue to sell alcohol cheaply. Unfortunately, the commonly accepted myth is that a minimum price would hit the responsible drinker hard in the pocket. This is not the case with the weekly additional cost estimated to be 21p. A minimum price would target those drinks preferred by the heaviest drinkers and young people (with little available cash); largely ciders and own brand spirits.

Score

0

Q10. Should other factors or evidence be considered when setting a minimum unit price for alcohol? Please select one option.

Yes

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

The findings of research carried out by the University of Sheffield (updated January 2012) on a model based on the population of Scotland (4,523,448 people over the age of 11 years) are important. In particular, in Scotland: • A 50p minimum price was expected to result in a reduction in consumption of 7.8%, a 45p minimum by 6% and a 40p minimum by 4.6% • Changes in pricing affect mostly harmful drinker, with hazardous drinkers somewhat affected and moderate drinkers affected very little. • Lower minimum price thresholds are associated with reductions in beer/cider and spirit consumption but increases in wine consumption due to switching. Wine consumption also starts to decrease at thresholds over 45p. • As minimum price threshold increases, alcohol-related hospital admissions and deaths are estimated to reduce. Within the research model a reduction of 5,100 hospital admissions per annum was forecast for a 40p threshold compared with a 6,600 reduction for a 45p threshold and 8,600 for a 50p threshold. • A 40p threshold was estimated to reduce crimes by 2,900 offences per annum whereas a 45p threshold would lead to a reduction of 3,600 and a 50p threshold by 4,700. • Drug use and risky alcohol consumption is associated with a greater likelihood of engaging in ASB for 10-16s and 17-25s, but with alcohol being the stronger factor in 10-16 year olds. 66% of 10-16 year olds who classed themselves as being drunk once a month had committed ASB in the previous 12 months (36% in the 17-25 category) – Home Office (2005) Young People, Crime and Anti-Social Behaviour: Findings from the 2003 Crime and Justice Survey (2nd Edition).

Score

0

Q11. The government wishes to maintain the effectiveness of minimum unit pricing and is therefore proposing to adjust the minimum unit price level over time. 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

Score

0

Q12. 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

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

A minimum price per unit will raise awareness of the health, social and economic implications of alcohol consumption and have a positive impact on the irresponsible drinking habits of those with limited finance (eg under-age drinkers). There will be implications for retailers, particularly supermarkets, which use alcohol sales as a loss-leader. It is anticipated that price reductions of other products will be used to maintain customer numbers and ensure that additional alcohol costs are off-set as offers are moved to non-alcohol sales. The average shopper should be no worse off and those with low alcohol consumption may be better off.

Score

0

Page Score

0

## **Page 4: A ban on multi-buy promotions in the off-trade**

Q13. The government is consulting on introducing a ban on multi-buy promotions in the off-trade (e.g. shops and off-licences) as part of its wider strategy to reduce excessive alcohol consumption, and alongside the introduction of a minimum unit price. A ban on multi-buy promotions would therefore not apply to pubs, clubs, bars or restaurants. The term 'multi-buy promotions' refers to alcohol promotions that offer a discount for buying multiple items. 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. As well as being part of a wider strategy to reduce consumption and tackle irresponsible alcohol sales, a ban on multi-buy promotions would also contribute to the government's aim of encouraging people to be aware of how much they drink and the risks of excessive

drinking, so that they can make informed choices. The aim of this consultation is to assess support for such a ban and contribute to our understanding of the impact a ban on multi-buy promotions may have. The types of promotion it is proposed that a ban would include, are: two for the price of one, three for the price of two, buy one get one free, buy six and get 20 per cent off, 24 cans of lager costing less than 24 times the cost of a single 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, 3 for £10 where each bottle costs more than £3.33. More information is available in the full consultation document and the impact assessment. Do you want to answer questions on a ban on multi-buy promotions in the off-trade? Please select one option.

Yes

Score

0

Page Score

0

## Page 5: A ban on multi-buy promotions in the off-trade

Q14. Do you think there should be a ban on multi-buy promotions involving alcohol in the off-trade? Please select one option.

Yes

Score

0

Q15. Are there any further offers which should be included in a ban on multi-buy promotions? Please select one option.

Yes

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

A ban should be imposed as part of an overall strategy which includes a minimum price per unit. If price reductions are used to promote sales, the minimum price per unit should be maintained. For example for offers allowing: • a multi-buy discount to be hidden in another offer (eg buy 3 cases of alcohol and get a £10 discount on food, petrol) • a discount on other items eg buy 2 cases of beer get vodka half price. • a significant discount on case sales of a particular sized can/bottle over 4-packs of another size of the same product

Score

0

Q16. Should other factors or evidence be taken into account when considering a ban on multi-buy promotions? Please select one option.

Yes

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

Premises (in particular retail premises) with mixed use should be considered as there is a possibility of linking an on-sale with an off-sale. For

example, wine is often used by retailers as part of a multi-buy on a range of products (eg dinner for two, including wine, for £10). Consideration should be given to restrictions on this type of offer which may be extended to include other drinks to increase customer footfall should minimum pricing per unit and a ban on multi-buys be introduced. Research by Sheffield University on behalf of the Scottish Government indicated that a ban on multi-buy promotions would increase the effectiveness of MUP. A coordinated approach should be used to address price and availability as well as availability and quality of alcohol-related hospital and community services. Reductions in consumption would improve the health of lower income groups amongst which alcohol related deaths are significantly higher. There are a number of disparate age verification schemes operated across the country. ACPO would welcome an agreed position on a framework of minimum standards for alcohol age verification schemes and a recognized pathway for potential scheme providers to seek and attain ACPO/Home Office approval.

Score

0

Q17. 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

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

A reduction in alcohol consumption will result in a corresponding reduction in the demand for resources provided by Health and the police. Ipswich has introduced a voluntary ban on the sale of super-strength beers, lager and cider which are popular with street drinkers and young people for pre-loading binge drinking. Cheap super-strength alcohol is affordable for and attractive to underage drinkers and those with serious alcohol problems. Home Office Research (Alcohol, crime and disorder: a study of young adults – 2003) found that: .... much of the research evidence suggests that the 'binge' drinking culture, mainly associated with young adults, is particularly linked with crime and disorder.

Score

0

Page Score

0

## **Page 6: Reviewing the mandatory licensing conditions**

Q18. 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 alcohol 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. The government has also committed to consult on whether these mandatory licensing conditions should, where relevant, apply to both the on- and off-trade. This consultation forms part of that review, and will contribute to the government's understanding of how these mandatory conditions are perceived. The five mandatory licensing conditions currently set out in regulations in relation to the supply of alcohol are: a ban on irresponsible promotions, a ban on dispensing alcohol by one person directly into the mouth of another, a requirement to provide free tap water on request to customers, a requirement to have an age verification policy to prevent the sale of alcohol to persons under 18 years of age, and a requirement to make available to customers small measures such as half pints or beer or cider or 125ml glasses of wine. More information is available in the full consultation document. An explanation of each of these terms can be found on page 20 of the consultation document, in the glossary at the end. Do you want to answer questions on reviewing the mandatory licensing conditions? Please select one option.

Yes

Score

0

Page Score

0

## Page 7: Reviewing the mandatory licensing conditions

Q19. Do you think each of the mandatory licensing conditions is effective in promoting the licensing objectives? For more information on the licensing objectives please see the glossary at the end of the full consultation document. Please select one option (Yes, No, Don't know) from each drop down menu.

	<b>Prevention of crime and disorder</b>	<b>Public safety</b>	<b>Prevention of public nuisance</b>	<b>Protection of children from harm</b>
<b>Irresponsible promotions</b>	Yes	Yes	Yes	Yes
<b>Dispensing alcohol directly into the mouth</b>	Yes	Yes	Yes	Yes
<b>Mandatory provision of free tap water</b>	Yes	Yes	Yes	Yes

<b>Age verification policy</b>	Yes	Yes	Yes	Yes
<b>Mandatory provision of small measures</b>	Yes	Yes	Yes	Yes

Score

0

Q20. Do you think that the mandatory licensing conditions do enough to target irresponsible promotions in pubs and clubs? Please select one option.

No

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

An outline of the age verification policy and the requirement to produce an acceptable form of ID should be clearly displayed at the entrance and point of sale. Measures of dispense should be the default for sale. Offering a larger measure or up-selling should be prohibited. Paragraph 2 of Article 3 Schedule Mandatory Licensing Conditions should be amended

Score

0

Q21. Are there other issues related to the licensing objectives which could be tackled through a mandatory licensing condition? Please select one option.

Yes

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

Mandatory licensing conditions should include consideration of customer safety. This might include a requirement of door staff in (say) town centre locations and criteria for the training and accreditation of those staff. There is a risk associated with alcohol fuelled football related violence. Local licensing allows conditions to be imposed on the sale of alcohol to mitigate these risks (eg no alcohol sales between 12:00 -22:00 on match day Saturdays). Point of sale information on units of alcohol and recommended limits should be compulsory. Lower strength beers and wines should be promoted. Suzette Davenport, ACPO Roads Policing portfolio holder, has observed that any increase in the availability of alcohol at motorway and other service areas would send an inappropriate message about drink driving and could increase offending.

Score

0

Q22. Do you think that 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.

No

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

Although the broad balance is correct, particularly with the Government's intention to tackle MUP and Multiple unit selling, greater community involvement (and associated responsibility) in local licensing decisions is to be encouraged. The proposal that Cumulative Impact Policies should apply to both on-trade and off-trade is strongly supported, as is the decision to extend powers to make Early Morning Restrictions on the sale of alcohol and the removal of the vicinity test. The problems of alcohol harm are increasingly associated with cheap alcohol sold from off-licence premises, yet only one condition applies to the off trade.

Score

0

Page Score

0

## **Page 8: Health as a licensing objective for cumulative impact policies**

Q23. We want to ensure that licensing authorities are able to take alcohol-related health harms into consideration when making decisions about cumulative impact policies (CIPs) which can be used to manage problems linked to the density of premises in specific areas. 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. We are proposing 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. We expect that those areas with the highest levels of alcohol-related health harm, or fast rising levels of harm from alcohol, will be most likely to use this power. It 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. More information is available in the full consultation document and impact assessment. Do you want to answer questions on health as a licensing objective for cumulative impact policies? Please select one option.

Yes

Score

0

Page Score

0

## **Page 9: Health as a licensing objective for**

## cumulative impact policies

Q24. 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):

- Alcohol related conditions seen in hospital admissions and A&E departments
- Under 18 admissions to hospital
- Alcohol related conditions seen by local general practitioners
- Statistics related to recorded assault with injury
- Alcohol-related anti-social behaviour, crime and disorder statistics
- Liver disease and alcohol related deaths
- Domestic abuse

Q25. 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

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

Health related harm should be taken into consideration by licensing authorities. The proposal to make this discretionary rather than obligatory is questioned. Rather it is proposed that all Cumulative Impact Statements should include an assessment by Health of the implications of granting or continuing to allow a license. The proposal to introduce a health related objective for licensing related specifically to the cumulative impact is welcomed. As a responsible authority, it is very appropriate that Health should be able to both instigate and contribute to the review of a licence.

Score

0

Q26. 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 your answer in the box below, providing evidence to support your response (keeping your views to a maximum of 200 words):

Introducing a public health objective, particularly to support over-provision or saturation policies at a local level, would enable licensing decisions to be made taking into account the full impact of alcohol harm within the local council's boundaries. It would enable local authorities to control the availability of alcohol in their area – and thus impose some measure of control on the level of harm.

Fewer premises within a particular area would reduce the need for competitive pricing. It would limit the availability of alcohol at a local level to young people.

A&E data would highlight the level of alcohol-related assaults reporting, many of which are not reported to the police.

Page Score

0

## Page 10: Freeing up responsible businesses

Q27. The government has committed to consult on giving licensing authorities greater freedom to take decisions that reflect the needs of their local community. Following the government's Red Tape Challenge in 2011, three areas of reform were specified: alcohol licensing for certain types of premises providing minimal alcohol sales, temporary event notices (TENs) and the licensing of late night refreshment. This section asks for views on these proposals and suggests further ways to reduce burdens on business. The proposals set out here can be seen alongside work undertaken by the Department for Culture, Media and Sport to remove unnecessary red tape from regulated entertainment. More information on each of these areas for reform is available in the full consultation document. There are five subjects covered in this section. They are: ancillary sales of alcohol, occasional provision of licensable activities at community events, an extension of the temporary event notice limit at individual premises, late night refreshment, and further proposals to reduce burdens on business. Do you want to answer questions on freeing up responsible businesses? Please select one option.

Yes

Score

0

Page Score

0

## Page 11: Freeing up responsible businesses

Q28. Ancillary sales of alcohol For many businesses, the sale of alcohol is only a small part of, or incidental to, their wider activities, and occurs alongside the provision of another product or service (which this consultation refers to as an 'ancillary sale'). For example, a guesthouse might wish to provide wine to its guests with an evening meal or a complimentary bottle of wine in a guest's room, while a hairdresser might wish to offer clients a glass of wine. 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
<b>The provision should be limited to a specific list of certain types of business and the kinds of sales they make</b>		X	

<b>The provision should be available to all businesses providing they meet certain qualification criteria to be an ancillary seller</b>	X		
<b>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 the above options</b>	X		

Score

0

Q29. If special provisions 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.

	Yes	No	Don't know
<b>Accommodation providers, providing alcohol alongside accommodation as part of the contract</b>	X		
<b>Hair and beauty salons, providing alcohol alongside a hair or beauty treatment</b>		X	
<b>Florists, providing alcohol alongside the purchase of flowers</b>	X		
<b>Cultural organisations, such as theatres, cinemas and museums, providing alcohol alongside cultural events as part of the entry ticket</b>		X	
<b>Regular charitable events, providing alcohol as part of the wider occasion</b>	X		

Score

0

Q30. 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 suggestions in the box below, keeping your views to a maximum of 200 words:

The Government's work to reduce the burden of bureaucracy for responsible businesses should not allow the availability of alcohol to be increased. A baseline measure should therefore be established before any changes are made in order to monitor levels of bureaucracy and availability

Q31. 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. Alternatively, a second option is to broaden

the definition of 'ancillary sales' to include all businesses (and/or not for profit activities) through the use of a general set of qualification criteria, for example, to the effect that: alcohol must be sold or supplied as a small part or proportion of a sales transaction or contract for a wider service, and the amount of alcohol that could be supplied as part of that contract cannot exceed a prescribed amount Do you think that the qualification criteria proposed meet this aim?

No

***Please use the space below to provide further comments (keeping your views to a maximum of 200 words):***

The definition leaves scope for wide an interpretation. The amount of alcohol supplied should be defined carefully, as the variation between a bottle of wine or champagne with a gift of flowers etc is significantly more than a small glass of alcohol as part of a tour. There should be a restriction on how 'supplied as a part of a contract' is defined. For example, is the sale of a single rose one contract and could a dozen roses be treated as 12 contracts by those seeking a loophole? Sales involving alcohol should be restricted to a specified time frame.

Score

0

Q32. 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
<b>Allow premises making ancillary sales to request in their premises licence application that the requirement for a personal licence holder be removed</b>	X		
<b>Introduce a new, light-touch form of authorisation for premises making ancillary sales - an ASN but retaining the need for a personal licence holder</b>	X		
<b>Introduce a new, light touch form of authorisation for premises making ancillary sales - an ASN - with no requirement for a personal licence holder</b>	X		

Score

0

Q33. Do you think these proposals would impact adversely on one or more of the licensing objectives? Please select one option.

	Yes	No	Don't know
<b>Allow premises making ancillary sales to request</b>	X		

<b>in their premises licence application that the requirement for a personal licence holder be removed</b>			
<b>Introduce a new, light-touch form of authorisation for premises making ancillary sales - an ASN but retaining the need for a personal licence holder</b>	X		
<b>Introduce a new, light touch form of authorisation for premises making ancillary sales - an ASN - with no requirement for a personal licence holder</b>	X		

Score

0

Q34. 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 response to a maximum of 200 words:

The objective of introducing lighter touch authorisation should be questioned. In a comparison of the harm caused by drug use, the final report of the UK Drugs Commission (October 2012) scores alcohol higher than any other drug considered.

It would be appropriate to consider a Cumulative Impact Statement for the area in which the ancillary seller would be trading.

There should be an ability to revoke or remove an ancillary sales notice and to restrict hours of operation.

A procedure similar to that for minor variations would appear to be an appropriate mechanism.

Any de-regulation should be balanced against the risk of an increase in alcohol consumption and the likely impact on crime and disorder, particularly within the Night Time Economy.

Licensing authorities should have the power to require a full license should problems arise as a result of a business's ancillary seller status.

Page Score

0

## Page 12: Freeing up responsible businesses

Q35. 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.

No

Score

0

Q36. 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
<b>Reduce the burden</b>			X
<b>Increase the burden</b>			X

Score

0

Page Score

0

## Page 13: Freeing up responsible businesses

Q37. Should the number of TENS which can be given in respect of individual premises be increased? Please select one option.

No

Score

0

Q38. If you answered yes, please select one option to indicate which you would prefer. Please select one option.

*No Response*

Score

0

Page Score

0

## Page 14: Freeing up responsible businesses

Q39. 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
<b>Determining that premises in certain areas are exempt</b>		X	
<b>Determining that certain premises types are exempt in their local area</b>		X	

Score

0

Q40. 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

Score

0

Q41. 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).

*No Response*

Page Score

0

## Page 15: Freeing up responsible businesses

Q42. Do you agree with each of the following proposals? Please select one option in each row.

	Yes	No	Don't know
<b>Remove requirements to advertise licensing applications in local newspapers</b>		X	
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs for the on and off-trade</b>		X	
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs, but only in respect of overnight accommodation - lodges</b>		X	
<b>Remove or simplify requirements to renew personal licences under the 2003 Act</b>		X	

Score

0

Q43. 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
<b>Remove requirements to advertise licensing applications in local newspapers</b>	X		
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs for the on and off-trade</b>			X
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs, but only in respect of overnight accommodation - lodges</b>			X
<b>Remove or simplify requirements to renew personal licences under the 2003 Act</b>			X

Score

0

Q44. 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.

	Yes	No	Don't know
<b>Remove requirements to advertise licensing applications in local newspapers</b>	X		
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs for the on and off-trade</b>	X		
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs, but only in respect of overnight accommodation - lodges</b>	X		
<b>Remove or simplify requirements to renew personal licences under the 2003 Act</b>	X		

Score

0

Q45. 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 keep your views to a maximum of 200 words.)

*No Response*

Page Score

0

## Page 16: Impact assessments

Q46. Impact assessments for the proposals in this consultation have been published alongside the full consultation document. 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
<b>Minimum unit pricing</b>		X	
<b>Multi-buy promotions</b>		X	
<b>Health as a licensing objective for cumulative impact</b>		X	
<b>Ancillary sales of alcohol</b>		X	
<b>Temporary event notices</b>		X	

<b>Late night refreshment</b>		X	
<b>Removing the duty to advertise licence applications in a local newspaper</b>		X	
<b>Sales of alcohol at motorway service stations</b>		X	
<b>Personal licences</b>		X	

Score

0

Q47. Do you have any comments on the methodologies or assumptions used in the impact assessments? If yes, please specify in the box below, clearly referencing the impact assessment and page to which you refer (keeping your views to a maximum of 400 words).

*No Response*

Page Score

0

## Scoring Summary

Pages	Total
1. About you	0
2. A minimum unit price for alcohol	0
3. A minimum unit price for alcohol	0
4. A ban on multi-buy promotions in the off-trade	0
5. A ban on multi-buy promotions in the off-trade	0
6. Reviewing the mandatory licensing conditions	0
7. Reviewing the mandatory licensing conditions	0
8. Health as a licensing objective for cumulative impact policies	0
9. Health as a licensing objective for cumulative impact policies	0
10. Freeing up responsible businesses	0

11. Freeing up responsible businesses	0
12. Freeing up responsible businesses	0
13. Freeing up responsible businesses	0
14. Freeing up responsible businesses	0
15. Freeing up responsible businesses	0
16. Impact assessments	0
<b>Total Survey Score:</b>	0

# Alcohol strategy consultation

---

User Details - 5462309

**Date Started:** 05/02/2013 10:45:20    **Date Ended:** 05/02/2013 11:00:58

**Time taken:** 15 mins, 38 secs    **IP Address:** n/a

**Unique ID:** n/a

---

## Page 1: About you

Q1. Please select if you would like your response or personal details to be treated as confidential.

*No Response*

Score

0

Q2. Which of the following best describes you or the professional interest you represent? Please select one option from the menu below.

Member of the public

Score

0

Q3. If you are responding on behalf of an organisation or interest group, please write in the box below the number of members in your group or organisation.

*No Response*

Q4. How did you obtain the views of your members? Please explain in the box below keeping your response to a maximum of 100 words.

*No Response*

Q5. Please indicate in which region you or your organisation is based. Please select one option from the menu below.

West Midlands

Score

0

Q6. If you are responding as a member of the public, what is your gender? Please select one option.

Female

Score

0

Q7. If you are responding as a member of the public, what is your age? Please select one option.

25-34

Score

0

Page Score

0

## Page 2: A minimum unit price for alcohol

Q8. In the alcohol strategy, the government committed to introducing a minimum unit price for alcohol in England and Wales. This consultation will contribute to the debate on the most appropriate price per unit and the mechanism by which, once set, minimum unit pricing would remain effective. It is also an opportunity for interested parties to raise other issues around minimum unit pricing. The purpose of minimum unit pricing is to reduce alcohol consumption, particularly by the most hazardous and harmful drinkers who tend to show a preference for the cheapest alcohol products. By doing so the government estimates there will be a reduction in the associated crime and health harms, especially the numbers of hospital admissions, alcohol-related deaths and alcohol-related crimes. Minimum unit pricing is not intended disproportionately to affect responsible drinkers or particular social groups but to reduce the availability of alcohol sold at very low or heavily discounted prices. More information (including the definitions of hazardous and harmful drinkers) is available in the full consultation document and the impact assessment. Do you want to answer questions on minimum unit pricing? Please select one option.

Yes

Score

0

Page Score

0

## Page 3: A minimum unit price for alcohol

Q9. The impact of minimum unit pricing will depend on the price per unit of alcohol. The government wants to ensure that the chosen price level is targeted and proportionate, whilst achieving a significant reduction of harm. The government is therefore consulting on the introduction of a recommended minimum unit price of 45p. The government estimates a reduction in consumption across all product types of 3.3 per cent, a reduction in crime of 5,240 per year, a reduction in 24,600 alcohol-related hospital admissions and 714 fewer deaths per year after ten years. Do you agree that this minimum unit price level would achieve these aims? Please select one option.

No

Score

0

Q10. Should other factors or evidence be considered when setting a minimum unit price for alcohol? Please select one option.

Yes

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

Universal benefit will place the most vulnerable people with alcohol

dependencies (who may not be recognised by the state as being in this position) in a situation where they have the means to purchase alcohol and binge drink to a dangerous, potentially fatal level. Minimum unit price will do nothing to stop this.

Score

0

Q11. The government wishes to maintain the effectiveness of minimum unit pricing and is therefore proposing to adjust the minimum unit price level over time. 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

Score

0

Q12. 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

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

Poor people, unemployed, low wage earners etc will be unable to afford a reasonable amount of alcohol, as their benefits are being cut to such an extent

Score

0

Page Score

0

## **Page 4: A ban on multi-buy promotions in the off-trade**

Q13. The government is consulting on introducing a ban on multi-buy promotions in the off-trade (e.g. shops and off-licences) as part of its wider strategy to reduce excessive alcohol consumption, and alongside the introduction of a minimum unit price. A ban on multi-buy promotions would therefore not apply to pubs, clubs, bars or restaurants. The term 'multi-buy promotions' refers to alcohol promotions that offer a discount for buying multiple items. 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. As well as being part of a wider strategy to reduce consumption and tackle irresponsible alcohol sales, a ban on multi-buy promotions would also contribute to the government's aim of encouraging people to be aware of how much they drink and the risks of excessive drinking, so that they can make informed choices. The aim of this consultation is to assess support for such a ban and contribute to our

understanding of the impact a ban on multi-buy promotions may have. The types of promotion it is proposed that a ban would include, are: two for the price of one, three for the price of two, buy one get one free, buy six and get 20 per cent off, 24 cans of lager costing less than 24 times the cost of a single 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, 3 for £10 where each bottle costs more than £3.33. More information is available in the full consultation document and the impact assessment. Do you want to answer questions on a ban on multi-buy promotions in the off-trade? Please select one option.

Yes

Score

0

Page Score

0

## Page 5: A ban on multi-buy promotions in the off-trade

Q14. Do you think there should be a ban on multi-buy promotions involving alcohol in the off-trade? Please select one option.

No

Score

0

Q15. Are there any further offers which should be included in a ban on multi-buy promotions? Please select one option.

No

Score

0

Q16. Should other factors or evidence be taken into account when considering a ban on multi-buy promotions? Please select one option.

Yes

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

Universal Benefit will put vulnerable people with alcohol dependencies in a position where they will be able to purchase dangerous levels of alcohol once a month regardless of the offers, and then end up in dangerous levels of debt as a result

Score

0

Q17. 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

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

those on benefits and low wage earners

Score

0

Page Score

0

## Page 6: Reviewing the mandatory licensing conditions

Q18. 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 alcohol 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. The government has also committed to consult on whether these mandatory licensing conditions should, where relevant, apply to both the on- and off-trade. This consultation forms part of that review, and will contribute to the government's understanding of how these mandatory conditions are perceived. The five mandatory licensing conditions currently set out in regulations in relation to the supply of alcohol are: a ban on irresponsible promotions a ban on dispensing alcohol by one person directly into the mouth of another a requirement to provide free tap water on request to customers a requirement to have an age verification policy to prevent the sale of alcohol to persons under 18 years of age, and a requirement to make available to customers small measures such as half pints or beer or cider or 125ml glasses of wine More information is available in the full consultation document. An explanation of each of these terms can be found on page 20 of the consultation document, in the glossary at the end. Do you want to answer questions on reviewing the mandatory licensing conditions? Please select one option.

Yes

Score

0

Page Score

0

## Page 7: Reviewing the mandatory licensing conditions

Q19. Do you think each of the mandatory licensing conditions is effective in promoting the licensing objectives? For more information on the licensing objectives please see the glossary at the end of the full consultation document. Please select one option (Yes, No, Don't know) from each drop down menu.

	Prevention of crime and disorder	Public safety	Prevention of public nuisance	Protection of children from harm

<b>Irresponsible promotions</b>	No	No	No	No
<b>Dispensing alcohol directly into the mouth</b>	Yes	Yes	Yes	Yes
<b>Mandatory provision of free tap water</b>	Yes	Yes	Yes	Yes
<b>Age verification policy</b>	No	No	No	No
<b>Mandatory provision of small measures</b>	No	No	No	No

Score

0

Q20. Do you think that the mandatory licensing conditions do enough to target irresponsible promotions in pubs and clubs? Please select one option.

No

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

more checks, reinforcement etc. Different definitions mean that a small measure in one bar is a large in the next

Score

0

Q21. Are there other issues related to the licensing objectives which could be tackled through a mandatory licensing condition? Please select one option.

Don't know

Score

0

Q22. Do you think that 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.

Don't know

Score

0

Page Score

0

**Page 8: Health as a licensing objective for cumulative impact policies**

Q23. We want to ensure that licensing authorities are able to take alcohol-related health harms into consideration when making decisions about cumulative impact policies (CIPs) which can be used to manage problems linked to the density of premises in specific areas. 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. We are proposing 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. We expect that those areas with the highest levels of alcohol-related health harm, or fast rising levels of harm from alcohol, will be most likely to use this power. It 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. More information is available in the full consultation document and impact assessment. Do you want to answer questions on health as a licensing objective for cumulative impact policies? Please select one option.

No

Score

0

Page Score

0

## Page 9: Health as a licensing objective for cumulative impact policies

Q24. 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):

*No Response*

Q25. 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.

*No Response*

Score

0

Q26. 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 your answer in the box below, providing evidence to support your response (keeping your views to a maximum of 200 words):

*No Response*

## Page 10: Freeing up responsible businesses

Q27. The government has committed to consult on giving licensing authorities greater freedom to take decisions that reflect the needs of their local community. Following the government's Red Tape Challenge in 2011, three areas of reform were specified: alcohol licensing for certain types of premises providing minimal alcohol sales, temporary event notices (TENs) and the licensing of late night refreshment. This section asks for views on these proposals and suggests further ways to reduce burdens on business. The proposals set out here can be seen alongside work undertaken by the Department for Culture, Media and Sport to remove unnecessary red tape from regulated entertainment. More information on each of these areas for reform is available in the full consultation document. There are five subjects covered in this section. They are: ancillary sales of alcohol, occasional provision of licensable activities at community events, an extension of the temporary event notice limit at individual premises, late night refreshment, and further proposals to reduce burdens on business. Do you want to answer questions on freeing up responsible businesses? Please select one option.

Yes

Score

0

## Page 11: Freeing up responsible businesses

Q28. Ancillary sales of alcohol. For many businesses, the sale of alcohol is only a small part of, or incidental to, their wider activities, and occurs alongside the provision of another product or service (which this consultation refers to as an 'ancillary sale'). For example, a guesthouse might wish to provide wine to its guests with an evening meal or a complimentary bottle of wine in a guest's room, while a hairdresser might wish to offer clients a glass of wine. 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
<b>The provision should be limited to a specific list of certain types of business and the kinds of sales they make</b>	X		
<b>The provision should be available to all businesses providing they meet certain</b>			X

<b>qualification criteria to be an ancillary seller</b>			
<b>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 the above options</b>	X		

Score

0

Q29. If special provisions 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.

	Yes	No	Don't know
<b>Accommodation providers, providing alcohol alongside accommodation as part of the contract</b>	X		
<b>Hair and beauty salons, providing alcohol alongside a hair or beauty treatment</b>	X		
<b>Florists, providing alcohol alongside the purchase of flowers</b>			X
<b>Cultural organisations, such as theatres, cinemas and museums, providing alcohol alongside cultural events as part of the entry ticket</b>	X		
<b>Regular charitable events, providing alcohol as part of the wider occasion</b>	X		

Score

0

Q30. 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 suggestions in the box below, keeping your views to a maximum of 200 words:

**No Response**

Q31. 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. Alternatively, a second option is to broaden the definition of 'ancillary sales' to include all businesses (and/or not for profit activities) through the use of a general set of qualification criteria, for example, to the effect that: alcohol must be sold or supplied as a small part or proportion of a sales transaction or contract for a wider service, and the amount of alcohol that could be supplied as part of that contract cannot

exceed a prescribed amount Do you think that the qualification criteria proposed meet this aim?

Don't know

Score

0

Q32. 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
<b>Allow premises making ancillary sales to request in their premises licence application that the requirement for a personal licence holder be removed</b>			X
<b>Introduce a new, light-touch form of authorisation for premises making ancillary sales - an ASN but retaining the need for a personal licence holder</b>	X		
<b>Introduce a new, light touch form of authorisation for premises making ancillary sales - an ASN - with no requirement for a personal licence holder</b>			X

Score

0

Q33. Do you think these proposals would impact adversely on one or more of the licensing objectives? Please select one option.

	Yes	No	Don't know
<b>Allow premises making ancillary sales to request in their premises licence application that the requirement for a personal licence holder be removed</b>			X
<b>Introduce a new, light-touch form of authorisation for premises making ancillary sales - an ASN but retaining the need for a personal licence holder</b>			X
<b>Introduce a new, light touch form of authorisation for premises making ancillary sales - an ASN - with no requirement for a personal licence holder</b>			X

Score

0

Q34. 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 response to a maximum of 200 words:

*No Response*

Page Score

0

## Page 12: Freeing up responsible businesses

Q35. 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

Score

0

Q36. 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
Reduce the burden			X
Increase the burden			X

Score

0

Page Score

0

## Page 13: Freeing up responsible businesses

Q37. Should the number of TENs which can be given in respect of individual premises be increased? Please select one option.

Don't know

Score

0

Q38. If you answered yes, please select one option to indicate which you would prefer. Please select one option.

*No Response*

Score

0

Page Score

0

## Page 14: Freeing up responsible businesses

Q39. 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
Determining that premises in certain areas are exempt	X		

<b>Determining that certain premises types are exempt in their local area</b>	X		
---	---	--	--

Score

0

Q40. 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.

No

Score

0

Q41. 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).

**No Response**

Page Score

0

## Page 15: Freeing up responsible businesses

Q42. Do you agree with each of the following proposals? Please select one option in each row.

	Yes	No	Don't know
<b>Remove requirements to advertise licensing applications in local newspapers</b>			X
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs for the on and off-trade</b>		X	
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs, but only in respect of overnight accommodation - lodges</b>	X		
<b>Remove or simplify requirements to renew personal licences under the 2003 Act</b>			

Score

0

Q43. 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
<b>Remove requirements to advertise licensing applications in local newspapers</b>			X
<b>Remove the centrally imposed prohibition on the</b>			X

<b>sale of alcohol at MSAs for the on and off-trade</b>			
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs, but only in respect of overnight accommodation - lodges</b>			X
<b>Remove or simplify requirements to renew personal licences under the 2003 Act</b>			X

Score

0

Q44. 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.

	Yes	No	Don't know
<b>Remove requirements to advertise licensing applications in local newspapers</b>			X
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs for the on and off-trade</b>			X
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs, but only in respect of overnight accommodation - lodges</b>			X
<b>Remove or simplify requirements to renew personal licences under the 2003 Act</b>			X

Score

0

Q45. 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 keep your views to a maximum of 200 words.)

*No Response*

Page Score

0

## Page 16: Impact assessments

Q46. Impact assessments for the proposals in this consultation have been published alongside the full consultation document. 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
Minimum unit pricing		X	
Multi-buy promotions		X	
Health as a licensing objective for cumulative impact			X
Ancillary sales of alcohol			X
Temporary event notices			X
Late night refreshment			X
Removing the duty to advertise licence applications in a local newspaper			X
Sales of alcohol at motorway service stations			X
Personal licences			X

Score

0

Q47. Do you have any comments on the methodologies or assumptions used in the impact assessments? If yes, please specify in the box below, clearly referencing the impact assessment and page to which you refer (keeping your views to a maximum of 400 words).

*No Response*

Page Score

0

## Scoring Summary

Pages	Total
1. About you	0
2. A minimum unit price for alcohol	0
3. A minimum unit price for alcohol	0
4. A ban on multi-buy promotions in the off-trade	0
5. A ban on multi-buy promotions in the off-trade	0

6. Reviewing the mandatory licensing conditions	0
7. Reviewing the mandatory licensing conditions	0
8. Health as a licensing objective for cumulative impact policies	0
9. Health as a licensing objective for cumulative impact policies	0
10. Freeing up responsible businesses	0
11. Freeing up responsible businesses	0
12. Freeing up responsible businesses	0
13. Freeing up responsible businesses	0
14. Freeing up responsible businesses	0
15. Freeing up responsible businesses	0
16. Impact assessments	0
<b>Total Survey Score:</b>	<b>0</b>

# Alcohol strategy consultation

User Details - 5431294

**Date Started:** 31/01/2013 11:34:40      **Date Ended:** 05/02/2013 11:29:14

**Time taken:** 119 hrs, 54 mins, 34 secs   **IP Address:** n/a

**Unique ID:** n/a

## Page 1: About you

Q1. Please select if you would like your response or personal details to be treated as confidential.

*No Response*

Score

0

Q2. Which of the following best describes you or the professional interest you represent? Please select one option from the menu below.

Police and crime commissioner

***Please specify which organisation, licensing authority or police force you represent in the box below:***

Office of the Police and Crime Commissioner for Dorset

Score

0

Q3. If you are responding on behalf of an organisation or interest group, please write in the box below the number of members in your group or organisation.

*No Response*

Q4. How did you obtain the views of your members? Please explain in the box below keeping your response to a maximum of 100 words.

*No Response*

Q5. Please indicate in which region you or your organisation is based.

Please select one option from the menu below.

South West England

Score

0

Q6. If you are responding as a member of the public, what is your gender?

Please select one option.

*No Response*

Score

0

Q7. If you are responding as a member of the public, what is your age?

Please select one option.

No Response

Score

0

Page Score

0

## Page 2: A minimum unit price for alcohol

Q8. In the alcohol strategy, the government committed to introducing a minimum unit price for alcohol in England and Wales. This consultation will contribute to the debate on the most appropriate price per unit and the mechanism by which, once set, minimum unit pricing would remain effective. It is also an opportunity for interested parties to raise other issues around minimum unit pricing. The purpose of minimum unit pricing is to reduce alcohol consumption, particularly by the most hazardous and harmful drinkers who tend to show a preference for the cheapest alcohol products. By doing so the government estimates there will be a reduction in the associated crime and health harms, especially the numbers of hospital admissions, alcohol-related deaths and alcohol-related crimes. Minimum unit pricing is not intended disproportionately to affect responsible drinkers or particular social groups but to reduce the availability of alcohol sold at very low or heavily discounted prices. More information (including the definitions of hazardous and harmful drinkers) is available in the full consultation document and the impact assessment. Do you want to answer questions on minimum unit pricing? Please select one option.

Yes

Score

0

Page Score

0

## Page 3: A minimum unit price for alcohol

Q9. The impact of minimum unit pricing will depend on the price per unit of alcohol. The government wants to ensure that the chosen price level is targeted and proportionate, whilst achieving a significant reduction of harm. The government is therefore consulting on the introduction of a recommended minimum unit price of 45p. The government estimates a reduction in consumption across all product types of 3.3 per cent, a reduction in crime of 5,240 per year, a reduction in 24,600 alcohol-related hospital admissions and 714 fewer deaths per year after ten years. Do you agree that this minimum unit price level would achieve these aims? Please select one option.

No

***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):***

Research suggests that the more intensive the pricing policy the greater the harm reduction achieved. However there is also the need for the MUP to be

proportionate and affordable for moderate drinkers. I would support an initial MUP level of nearer 50p, as has recently been approved in Scotland, with a regular and ongoing review of the level and its effectiveness.

Score

0

Q10. Should other factors or evidence be considered when setting a minimum unit price for alcohol? Please select one option.

Yes

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

The MUP is just one of a range of measures needed to achieve the desired outcomes. It would need to operate in tandem with action over alcohol promotions and discounts, better enforcement of existing legislation, and wider education to change attitudes and the drinking culture currently experienced. The MUP should be reviewed annually as a minimum (see below). Protecting the MUP against inflation should also be the minimum, although given the benefits achieved the higher the level of MUP, there should be flexibility to increase as desired.

Score

0

Q11. The government wishes to maintain the effectiveness of minimum unit pricing and is therefore proposing to adjust the minimum unit price level over time. 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 automatically be updated in line with inflation each year

Score

0

Q12. 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

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

Dependent drinkers without appropriate support will seek to maintain their intake regardless of MUP. This could have a number of knock-on effects including theft/shoplifting, home-brewing, smuggling, a switch to other drugs or a combination of these. Clearly the others most affected will be the industry and retailers – supermarkets who use cheap alcohol sales as a loss-leader plus small businesses where alcohol sales sometimes supplement their core business.

Score

0

Page Score

0

## Page 4: A ban on multi-buy promotions in the off-trade

Q13. The government is consulting on introducing a ban on multi-buy promotions in the off-trade (e.g. shops and off-licences) as part of its wider strategy to reduce excessive alcohol consumption, and alongside the introduction of a minimum unit price. A ban on multi-buy promotions would therefore not apply to pubs, clubs, bars or restaurants. The term 'multi-buy promotions' refers to alcohol promotions that offer a discount for buying multiple items. 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. As well as being part of a wider strategy to reduce consumption and tackle irresponsible alcohol sales, a ban on multi-buy promotions would also contribute to the government's aim of encouraging people to be aware of how much they drink and the risks of excessive drinking, so that they can make informed choices. The aim of this consultation is to assess support for such a ban and contribute to our understanding of the impact a ban on multi-buy promotions may have. The types of promotion it is proposed that a ban would include, are: two for the price of one, three for the price of two, buy one get one free, buy six and get 20 per cent off, 24 cans of lager costing less than 24 times the cost of a single 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, 3 for £10 where each bottle costs more than £3.33. More information is available in the full consultation document and the impact assessment. Do you want to answer questions on a ban on multi-buy promotions in the off-trade? Please select one option.

Yes

Score

0

Page Score

0

## Page 5: A ban on multi-buy promotions in the off-trade

Q14. Do you think there should be a ban on multi-buy promotions involving alcohol in the off-trade? Please select one option.

Yes

Score

0

Q15. Are there any further offers which should be included in a ban on multi-buy promotions? Please select one option.

Yes

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

I am concerned that there should not be any ambiguity in the wording of any bans introduced. For example, an offer of 33% off should not be allowed to be substituted for a 'three for the price of two' offer. 'Hidden' offers also need to be considered – e.g. if you purchase 'x' amount of alcohol then you get a discount on other items, such as food or fuel. There also needs to be flexibility within the legislation to counter any measures taken by the industry and retailers to invent ways of subverting its intentions.

Score

0

Q16. Should other factors or evidence be taken into account when considering a ban on multi-buy promotions? Please select one option.

Yes

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

I am concerned about the way that alcohol is displayed and would like to see it hidden from view in the same way that cigarettes now are. There may be the option to create 'adults only' areas in larger stores where alcohol would be held / sold. Alcohol should be kept behind the counter of smaller shops.

Score

0

Q17. 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

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

Other than the industry / retailers, none specifically. Specific measures around the display of alcohol (e.g. hidden or behind counters) may impact on smaller retailers if they have to reconfigure their stores. 'Pre-loading' on cheap alcohol is of real concern and promotes an unhealthy drinking culture. There are also the well documented crime, anti-social behaviour and health implications related to irresponsible drinking behaviour which can partly be attributed to the availability of cheap alcohol.

Score

0

Page Score

0

## **Page 6: Reviewing the mandatory licensing conditions**

Q18. 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 alcohol 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. The government has also committed to consult on whether these mandatory licensing conditions should, where relevant, apply to both the on- and off-trade. This consultation forms part of that review, and will contribute to the government's understanding of how these mandatory conditions are perceived. The five mandatory licensing conditions currently set out in regulations in relation to the supply of alcohol are: a ban on irresponsible promotions, a ban on dispensing alcohol by one person directly into the mouth of another, a requirement to provide free tap water on request to customers, a requirement to have an age verification policy to prevent the sale of alcohol to persons under 18 years of age, and a requirement to make available to customers small measures such as half pints of beer or cider or 125ml glasses of wine. More information is available in the full consultation document. An explanation of each of these terms can be found on page 20 of the consultation document, in the glossary at the end. Do you want to answer questions on reviewing the mandatory licensing conditions? Please select one option.

Yes

Score

0

Page Score

0

## Page 7: Reviewing the mandatory licensing conditions

Q19. Do you think each of the mandatory licensing conditions is effective in promoting the licensing objectives? For more information on the licensing objectives please see the glossary at the end of the full consultation document. Please select one option (Yes, No, Don't know) from each drop down menu.

	<b>Prevention of crime and disorder</b>	<b>Public safety</b>	<b>Prevention of public nuisance</b>	<b>Protection of children from harm</b>
<b>Irresponsible promotions</b>	No	No	No	No
<b>Dispensing alcohol directly into the mouth</b>	Don't know	Don't know	Don't know	Don't know
<b>Mandatory provision of free tap water</b>	No	No	No	No

<b>Age verification policy</b>	No	No	No	No
<b>Mandatory provision of small measures</b>	Don't know	Don't know	Don't know	Don't know

Score

0

Q20. Do you think that the mandatory licensing conditions do enough to target irresponsible promotions in pubs and clubs? Please select one option.

No

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

They do not go far enough and are not widely publicised e.g. there is a lack of awareness around the requirement for free tap water to be provided.

Score

0

Q21. Are there other issues related to the licensing objectives which could be tackled through a mandatory licensing condition? Please select one option.

Yes

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

The 'vertical drinking' culture in a number of establishments should be addressed. One way to do this may be to consider a minimum ratio of seats to customers? Mandatory licensing conditions could include a consideration for 'customer safety' – this might include requirements for door staff and for the training/accreditation of those staff.

Score

0

Q22. Do you think that 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.

No

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

No. This links to the earlier point about alcohol not being overtly displayed and being 'hidden' or held behind counters instead. Conditions could also apply to shops to contribute to local prevention initiatives, such as Shop Watch, for them to take some responsibility for behaviours and issues in their immediate environ. Also applying the late night levy to the off-trade may be appropriate.

Score

0

Page Score

0

## Page 8: Health as a licensing objective for cumulative impact policies

Q23. We want to ensure that licensing authorities are able to take alcohol-related health harms into consideration when making decisions about cumulative impact policies (CIPs) which can be used to manage problems linked to the density of premises in specific areas. 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. We are proposing 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. We expect that those areas with the highest levels of alcohol-related health harm, or fast rising levels of harm from alcohol, will be most likely to use this power. It 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. More information is available in the full consultation document and impact assessment. Do you want to answer questions on health as a licensing objective for cumulative impact policies? Please select one option.

Yes

Score

0

Page Score

0

## Page 9: Health as a licensing objective for cumulative impact policies

Q24. 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):

Possibly hospital / A&E admissions related to alcohol.

Q25. 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.

Don't know

Score

0

Q26. 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 your answer in the box below, providing evidence to support your response (keeping your views to a maximum of 200 words):

Don't Know.

Page Score

0

## Page 10: Freeing up responsible businesses

Q27. The government has committed to consult on giving licensing authorities greater freedom to take decisions that reflect the needs of their local community. Following the government's Red Tape Challenge in 2011, three areas of reform were specified: alcohol licensing for certain types of premises providing minimal alcohol sales, temporary event notices (TENs) and the licensing of late night refreshment. This section asks for views on these proposals and suggests further ways to reduce burdens on business. The proposals set out here can be seen alongside work undertaken by the Department for Culture, Media and Sport to remove unnecessary red tape from regulated entertainment. More information on each of these areas for reform is available in the full consultation document. There are five subjects covered in this section. They are: ancillary sales of alcohol, occasional provision of licensable activities at community events, an extension of the temporary event notice limit at individual premises, late night refreshment, and further proposals to reduce burdens on business. Do you want to answer questions on freeing up responsible businesses? Please select one option.

Yes

Score

0

Page Score

0

## Page 11: Freeing up responsible businesses

Q28. Ancillary sales of alcohol For many businesses, the sale of alcohol is only a small part of, or incidental to, their wider activities, and occurs alongside the provision of another product or service (which this consultation refers to as an 'ancillary sale'). For example, a guesthouse might wish to provide wine to its guests with an evening meal or a complimentary bottle of wine in a guest's room, while a hairdresser might wish to offer clients a glass of wine. 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
The provision should be limited to a specific list			X

<b>of certain types of business and the kinds of sales they make</b>			
<b>The provision should be available to all businesses providing they meet certain qualification criteria to be an ancillary seller</b>			X
<b>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 the above options</b>			X

Score

0

Q29. If special provisions 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.

	Yes	No	Don't know
<b>Accommodation providers, providing alcohol alongside accommodation as part of the contract</b>		X	
<b>Hair and beauty salons, providing alcohol alongside a hair or beauty treatment</b>		X	
<b>Florists, providing alcohol alongside the purchase of flowers</b>		X	
<b>Cultural organisations, such as theatres, cinemas and museums, providing alcohol alongside cultural events as part of the entry ticket</b>		X	
<b>Regular charitable events, providing alcohol as part of the wider occasion</b>		X	

Score

0

Q30. 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 suggestions in the box below, keeping your views to a maximum of 200 words:

I am against any relaxation of rules that may create loopholes or exploitation.

Q31. 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. Alternatively, a second option is to broaden the definition of 'ancillary sales' to include all businesses (and/or not for profit activities) through the use of a general set of qualification criteria, for example, to the effect that: alcohol must be sold or supplied as a small part or proportion of a sales transaction or contract for a wider service, and the amount of alcohol that could be supplied as part of that contract cannot exceed a prescribed amount. Do you think that the qualification criteria proposed meet this aim?

No

***Please use the space below to provide further comments (keeping your views to a maximum of 200 words):***

Why 'clamp down' on some areas of alcohol availability and consumption, yet 'normalise' the consumption of alcohol as ancillary to a host of other commercial activities? This does little to alter the drinking culture currently in place.

Score

0

Q32. 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
<b>Allow premises making ancillary sales to request in their premises licence application that the requirement for a personal licence holder be removed</b>			X
<b>Introduce a new, light-touch form of authorisation for premises making ancillary sales - an ASN but retaining the need for a personal licence holder</b>			X
<b>Introduce a new, light touch form of authorisation for premises making ancillary sales - an ASN - with no requirement for a personal licence holder</b>			X

Score

0

Q33. Do you think these proposals would impact adversely on one or more of the licensing objectives? Please select one option.

	Yes	No	Don't know
<b>Allow premises making ancillary sales to request in their premises licence application that the requirement for a personal licence holder be removed</b>			X

<b>Introduce a new, light-touch form of authorisation for premises making ancillary sales - an ASN but retaining the need for a personal licence holder</b>			X
<b>Introduce a new, light touch form of authorisation for premises making ancillary sales - an ASN - with no requirement for a personal licence holder</b>			X

Score

0

Q34. 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 response to a maximum of 200 words:

Any de-regulation should be balanced against the risk of an increase in alcohol consumption and the likely impact on crime and disorder, particularly within the Night Time Economy.

Page Score

0

## Page 12: Freeing up responsible businesses

Q35. 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

Score

0

Q36. 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
<b>Reduce the burden</b>	X		
<b>Increase the burden</b>	X		

Score

0

Page Score

0

## Page 13: Freeing up responsible businesses

Q37. Should the number of TENs which can be given in respect of individual premises be increased? Please select one option.

No

Score

0

Q38. If you answered yes, please select one option to indicate which you would prefer. Please select one option.

**No Response**

Score

0

Page Score

0

## Page 14: Freeing up responsible businesses

Q39. 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
<b>Determining that premises in certain areas are exempt</b>			X
<b>Determining that certain premises types are exempt in their local area</b>			X

Score

0

Q40. 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.

No

Score

0

Q41. 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).

Given the dangers of drink-driving, is it appropriate for alcohol to be made available at all in motorway service stations (or even petrol stations in general)?

Page Score

0

## Page 15: Freeing up responsible businesses

Q42. Do you agree with each of the following proposals? Please select one option in each row.

	Yes	No	Don't know
<b>Remove requirements to advertise licensing applications in local newspapers</b>			X
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs for the on and off-trade</b>			X
<b>Remove the centrally imposed prohibition on the</b>			X

<b>sale of alcohol at MSAs, but only in respect of overnight accommodation - lodges</b>			
<b>Remove or simplify requirements to renew personal licences under the 2003 Act</b>			X

Score

0

Q43. 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
<b>Remove requirements to advertise licensing applications in local newspapers</b>			X
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs for the on and off-trade</b>			X
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs, but only in respect of overnight accommodation - lodges</b>			X
<b>Remove or simplify requirements to renew personal licences under the 2003 Act</b>			X

Score

0

Q44. 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.

	Yes	No	Don't know
<b>Remove requirements to advertise licensing applications in local newspapers</b>			X
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs for the on and off-trade</b>			X
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs, but only in respect of overnight accommodation - lodges</b>			X
<b>Remove or simplify requirements to renew personal licences under the 2003 Act</b>			X

Score

0

Q45. 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 keep your views to a maximum of 200 words.)

*No Response*

Page Score

0

## Page 16: Impact assessments

Q46. Impact assessments for the proposals in this consultation have been published alongside the full consultation document. 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
<b>Minimum unit pricing</b>	X		
<b>Multi-buy promotions</b>	X		
<b>Health as a licensing objective for cumulative impact</b>	X		
<b>Ancillary sales of alcohol</b>	X		
<b>Temporary event notices</b>	X		
<b>Late night refreshment</b>	X		
<b>Removing the duty to advertise licence applications in a local newspaper</b>	X		
<b>Sales of alcohol at motorway service stations</b>	X		
<b>Personal licences</b>	X		

Score

0

Q47. Do you have any comments on the methodologies or assumptions used in the impact assessments? If yes, please specify in the box below, clearly referencing the impact assessment and page to which you refer (keeping your views to a maximum of 400 words).

At a glance the impact assessments all appear to be comprehensive.

Page Score

0

## Scoring Summary

Pages	Total
1. About you	0
2. A minimum unit price for alcohol	0
3. A minimum unit price for alcohol	0
4. A ban on multi-buy promotions in the off-trade	0
5. A ban on multi-buy promotions in the off-trade	0
6. Reviewing the mandatory licensing conditions	0
7. Reviewing the mandatory licensing conditions	0
8. Health as a licensing objective for cumulative impact policies	0
9. Health as a licensing objective for cumulative impact policies	0
10. Freeing up responsible businesses	0
11. Freeing up responsible businesses	0
12. Freeing up responsible businesses	0
13. Freeing up responsible businesses	0
14. Freeing up responsible businesses	0
15. Freeing up responsible businesses	0
16. Impact assessments	0
<b>Total Survey Score:</b>	<b>0</b>

# Alcohol strategy consultation

User Details - 5457134

**Date Started:** 04/02/2013 16:44:42

**Date Ended:** 05/02/2013 11:32:51

**Time taken:** 18 hrs, 48 mins, 9 secs

**IP Address:** n/a

**Unique ID:** n/a

## Page 1: About you

Q1. Please select if you would like your response or personal details to be treated as confidential.

**No Response**

Score

0

Q2. Which of the following best describes you or the professional interest you represent? Please select one option from the menu below.

Voluntary and community organisation

***Please specify which organisation, licensing authority or police force you represent in the box below:***

The Lesbian & Gay Foundation, Number 5 Richmond Street, Manchester. M1 3HF.

Score

0

Q3. If you are responding on behalf of an organisation or interest group, please write in the box below the number of members in your group or organisation.

**No Response**

Q4. How did you obtain the views of your members? Please explain in the box below keeping your response to a maximum of 100 words.

**No Response**

Q5. Please indicate in which region you or your organisation is based. Please select one option from the menu below.

North West England

Score

0

Q6. If you are responding as a member of the public, what is your gender? Please select one option.

Male

Score

0

Q7. If you are responding as a member of the public, what is your age?

Please select one option.

25-34

Score

0

Page Score

0

## Page 2: A minimum unit price for alcohol

Q8. In the alcohol strategy, the government committed to introducing a minimum unit price for alcohol in England and Wales. This consultation will contribute to the debate on the most appropriate price per unit and the mechanism by which, once set, minimum unit pricing would remain effective. It is also an opportunity for interested parties to raise other issues around minimum unit pricing. The purpose of minimum unit pricing is to reduce alcohol consumption, particularly by the most hazardous and harmful drinkers who tend to show a preference for the cheapest alcohol products. By doing so the government estimates there will be a reduction in the associated crime and health harms, especially the numbers of hospital admissions, alcohol-related deaths and alcohol-related crimes. Minimum unit pricing is not intended disproportionately to affect responsible drinkers or particular social groups but to reduce the availability of alcohol sold at very low or heavily discounted prices. More information (including the definitions of hazardous and harmful drinkers) is available in the full consultation document and the impact assessment. Do you want to answer questions on minimum unit pricing? Please select one option.

Yes

Score

0

Page Score

0

## Page 3: A minimum unit price for alcohol

Q9. The impact of minimum unit pricing will depend on the price per unit of alcohol. The government wants to ensure that the chosen price level is targeted and proportionate, whilst achieving a significant reduction of harm. The government is therefore consulting on the introduction of a recommended minimum unit price of 45p. The government estimates a reduction in consumption across all product types of 3.3 per cent, a reduction in crime of 5,240 per year, a reduction in 24,600 alcohol-related hospital admissions and 714 fewer deaths per year after ten years. Do you agree that this minimum unit price level would achieve these aims? Please select one option.

Don't know

Score

0

Q10. Should other factors or evidence be considered when setting a minimum unit price for alcohol? Please select one option.

Don't know

Score

0

Q11. The government wishes to maintain the effectiveness of minimum unit pricing and is therefore proposing to adjust the minimum unit price level over time. 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

Score

0

Q12. 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.

**No Response**

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

It is important to consider the needs of those on lower incomes when setting the minimum unit price and assessing the impact that it will have on lower earning individuals and families.

Score

0

Page Score

0

## **Page 4: A ban on multi-buy promotions in the off-trade**

Q13. The government is consulting on introducing a ban on multi-buy promotions in the off-trade (e.g. shops and off-licences) as part of its wider strategy to reduce excessive alcohol consumption, and alongside the introduction of a minimum unit price. A ban on multi-buy promotions would therefore not apply to pubs, clubs, bars or restaurants. The term 'multi-buy promotions' refers to alcohol promotions that offer a discount for buying multiple items. 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. As well as being part of a wider strategy to reduce consumption and tackle irresponsible alcohol sales, a ban on multi-buy promotions would also contribute to the government's aim of encouraging people to be aware of how much they drink and the risks of excessive drinking, so that they can make informed choices. The aim of this consultation is to assess support for such a ban and contribute to our understanding of the impact a ban on multi-buy promotions may have. The types of promotion it is proposed that a ban would include, are: two for the price of one, three for the price of two, buy one get one free, buy six and get 20 per cent off, 24 cans of lager costing less than 24 times the cost of a single 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 for £10 where each bottle costs more than £3.33. More information is available in the full consultation document and the impact assessment. Do you want to answer questions on a ban on multi-buy promotions in the off-trade? Please select one option.

Yes

Score

0

Page Score

0

## Page 5: A ban on multi-buy promotions in the off-trade

Q14. Do you think there should be a ban on multi-buy promotions involving alcohol in the off-trade? Please select one option.

No

Score

0

Q15. Are there any further offers which should be included in a ban on multi-buy promotions? Please select one option.

No

Score

0

Q16. Should other factors or evidence be taken into account when considering a ban on multi-buy promotions? Please select one option.

Yes

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

All appropriate evidence should be used to guide and inform.

Score

0

Q17. 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

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

It will directly impact on people that have low incomes and won't be able to take advantage of 'special offers'. It could lead to people purchasing alternatives that may have more significant health impacts.

Score

0

Page Score

0

## Page 6: Reviewing the mandatory licensing conditions

Q18. 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 alcohol 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. The government has also committed to consult on whether these mandatory licensing conditions should, where relevant, apply to both the on- and off-trade. This consultation forms part of that review, and will contribute to the government's understanding of how these mandatory conditions are perceived. The five mandatory licensing conditions currently set out in regulations in relation to the supply of alcohol are: a ban on irresponsible promotions a ban on dispensing alcohol by one person directly into the mouth of another a requirement to provide free tap water on request to customers a requirement to have an age verification policy to prevent the sale of alcohol to persons under 18 years of age, and a requirement to make available to customers small measures such as half pints or beer or cider or 125ml glasses of wine More information is available in the full consultation document. An explanation of each of these terms can be found on page 20 of the consultation document, in the glossary at the end. Do you want to answer questions on reviewing the mandatory licensing conditions? Please select one option.

Yes

Score

0

Page Score

0

## Page 7: Reviewing the mandatory licensing conditions

Q19. Do you think each of the mandatory licensing conditions is effective in promoting the licensing objectives? For more information on the licensing objectives please see the glossary at the end of the full consultation document. Please select one option (Yes, No, Don't know) from each drop down menu.

	Prevention of crime and disorder	Public safety	Prevention of public nuisance	Protection of children from harm
Irresponsible promotions	Yes	Yes	Yes	Yes
Dispensing	Yes	Yes	Yes	Yes

<b>alcohol directly into the mouth</b>				
<b>Mandatory provision of free tap water</b>	Yes	Yes	Yes	Yes
<b>Age verification policy</b>	No	Yes	Yes	Yes
<b>Mandatory provision of small measures</b>	Yes	Yes	Yes	Yes

Score

0

Q20. Do you think that the mandatory licensing conditions do enough to target irresponsible promotions in pubs and clubs? Please select one option.

No

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

The implementation of education programmes to assist people within understanding their own individual limits/tolerance. Delivering alcohol 1:1 interventions in venues and other public settings.

Score

0

Q21. Are there other issues related to the licensing objectives which could be tackled through a mandatory licensing condition? Please select one option.

Yes

Score

0

Q22. Do you think that 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.

No

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

In order to promote responsible drinking, then the conditions should apply to both 'on' and 'off' trade wherever appropriate.

Score

0

Page Score

0

## Page 8: Health as a licensing objective for cumulative impact policies

Q23. We want to ensure that licensing authorities are able to take alcohol-

related health harms into consideration when making decisions about cumulative impact policies (CIPs) which can be used to manage problems linked to the density of premises in specific areas. 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. We are proposing 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. We expect that those areas with the highest levels of alcohol-related health harm, or fast rising levels of harm from alcohol, will be most likely to use this power. It 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. More information is available in the full consultation document and impact assessment. Do you want to answer questions on health as a licensing objective for cumulative impact policies? Please select one option.

Yes

Score

0

Page Score

0

## Page 9: Health as a licensing objective for cumulative impact policies

Q24. 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):

Part of the Picture (POTP) aims to establish a national database of lesbian, gay and bisexual (LGB) people's drug and alcohol use; to use the database to inform local and national policy and practice in addressing the drug and alcohol use of LGB people; and to improve knowledge and understanding of the needs of LGB people amongst drug and alcohol agencies through dissemination of the research findings.

Download the Part of the Picture 2009-11 Report by clicking [here](#).

This report presents four main findings from the first three years (2009-11) of POTP, from a total sample of 4,206 lesbian, gay and bisexual people:

Across all age groups LGB people are much more likely to use drugs

compared to the general population; 35% of respondents had taken at least one substance (excluding alcohol) in the last month. Drug use is common across all age groups, especially up to the age of 40.

Problematic patterns of drinking are much more common among LGB people. Binge drinking is high across all genders, sexual orientations and age groups, with 34% of males and 29% of females reporting binge drinking at least once or twice a week.

LGB people demonstrate a higher likelihood of being substance dependent and show high levels of substance-dependency. Over a fifth of the sample scored as dependent on a substance, and a further quarter showed at least one indicator of dependency.

Significant barriers exist to seeking information, advice or help among LGB people. Almost a third of respondents had sought information, advice or help about their substance use. The reasons given for not having sought information, advice or help indicate that LGB people are experiencing barriers both in relation to recognising they may have a substance problem which needs attention, and in accessing services where they feel comfortable and confident in the services provided.

You can review the report here:

[http://ripassetseu.s3.amazonaws.com/www.lgf.org.uk/\\_files/documents/jul\\_12/FENT\\_\\_1343638156\\_10584\\_POTP\\_Year\\_3\\_ReportFINAL.pdf](http://ripassetseu.s3.amazonaws.com/www.lgf.org.uk/_files/documents/jul_12/FENT__1343638156_10584_POTP_Year_3_ReportFINAL.pdf)

Q25. 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.

No

Score

0

Q26. 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 your answer in the box below, providing evidence to support your response (keeping your views to a maximum of 200 words):

We believe that it would impact on the availability of alcohol in addition to venues, potentially reducing the instances of alcohol related harm.

Page Score

0

## Page 10: Freeing up responsible businesses

Q27. The government has committed to consult on giving licensing authorities greater freedom to take decisions that reflect the needs of their local community. Following the government's Red Tape Challenge in 2011, three areas of reform were specified: alcohol licensing for certain types of premises providing minimal alcohol sales, temporary event notices (TENs) and the

licensing of late night refreshment. This section asks for views on these proposals and suggests further ways to reduce burdens on business. The proposals set out here can be seen alongside work undertaken by the Department for Culture, Media and Sport to remove unnecessary red tape from regulated entertainment. More information on each of these areas for reform is available in the full consultation document. There are five subjects covered in this section. They are: ancillary sales of alcohol, occasional provision of licensable activities at community events, an extension of the temporary event notice limit at individual premises, late night refreshment, and further proposals to reduce burdens on business. Do you want to answer questions on freeing up responsible businesses? Please select one option.

Yes

Score

0

Page Score

0

## Page 11: Freeing up responsible businesses

Q28. Ancillary sales of alcohol For many businesses, the sale of alcohol is only a small part of, or incidental to, their wider activities, and occurs alongside the provision of another product or service (which this consultation refers to as an 'ancillary sale'). For example, a guesthouse might wish to provide wine to its guests with an evening meal or a complimentary bottle of wine in a guest's room, while a hairdresser might wish to offer clients a glass of wine. 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
<b>The provision should be limited to a specific list of certain types of business and the kinds of sales they make</b>	X		
<b>The provision should be available to all businesses providing they meet certain qualification criteria to be an ancillary seller</b>	X		
<b>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 the above options</b>	X		

Score

0

Q29. If special provisions 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.

	Yes	No	Don't know
<b>Accommodation providers, providing alcohol alongside accommodation as part of the contract</b>		X	
<b>Hair and beauty salons, providing alcohol alongside a hair or beauty treatment</b>		X	
<b>Florists, providing alcohol alongside the purchase of flowers</b>		X	
<b>Cultural organisations, such as theatres, cinemas and museums, providing alcohol alongside cultural events as part of the entry ticket</b>		X	
<b>Regular charitable events, providing alcohol as part of the wider occasion</b>		X	

Score

0

Q30. 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 suggestions in the box below, keeping your views to a maximum of 200 words:

It may need to be considered that it should consider the impact of 'special event' licenses and 'one off' event licenses that may impact on a geographic area for special events.

Q31. 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. Alternatively, a second option is to broaden the definition of 'ancillary sales' to include all businesses (and/or not for profit activities) through the use of a general set of qualification criteria, for example, to the effect that: alcohol must be sold or supplied as a small part or proportion of a sales transaction or contract for a wider service, and the amount of alcohol that could be supplied as part of that contract cannot exceed a prescribed amount. Do you think that the qualification criteria proposed meet this aim?

Yes

Score

0

Q32. 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
<b>Allow premises making ancillary sales to request in their premises licence application that the requirement for a personal licence holder be removed</b>	X		
<b>Introduce a new, light-touch form of authorisation for premises making ancillary sales - an ASN but retaining the need for a personal licence holder</b>	X		
<b>Introduce a new, light touch form of authorisation for premises making ancillary sales - an ASN - with no requirement for a personal licence holder</b>	X		

Score

0

Q33. Do you think these proposals would impact adversely on one or more of the licensing objectives? Please select one option.

	Yes	No	Don't know
<b>Allow premises making ancillary sales to request in their premises licence application that the requirement for a personal licence holder be removed</b>		X	
<b>Introduce a new, light-touch form of authorisation for premises making ancillary sales - an ASN but retaining the need for a personal licence holder</b>		X	
<b>Introduce a new, light touch form of authorisation for premises making ancillary sales - an ASN - with no requirement for a personal licence holder</b>		X	

Score

0

Q34. 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 response to a maximum of 200 words:

**No Response**

Page Score

0

## Page 12: Freeing up responsible businesses

Q35. 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

Score

0

Q36. 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
<b>Reduce the burden</b>	X		
<b>Increase the burden</b>		X	

Score

0

Page Score

0

## Page 13: Freeing up responsible businesses

Q37. Should the number of TENs which can be given in respect of individual premises be increased? Please select one option.

Yes

Score

0

Q38. If you answered yes, please select one option to indicate which you would prefer. Please select one option.

18

Score

0

Page Score

0

## Page 14: Freeing up responsible businesses

Q39. 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
<b>Determining that premises in certain areas are exempt</b>	X		
<b>Determining that certain premises types are exempt in their local area</b>	X		

Score

0

Q40. 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

Score

0

Q41. 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).

*No Response*

Page Score

0

## Page 15: Freeing up responsible businesses

Q42. Do you agree with each of the following proposals? Please select one option in each row.

	Yes	No	Don't know
<b>Remove requirements to advertise licensing applications in local newspapers</b>		X	
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs for the on and off-trade</b>	X		
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs, but only in respect of overnight accommodation - lodges</b>	X		
<b>Remove or simplify requirements to renew personal licences under the 2003 Act</b>		X	

Score

0

Q43. 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
<b>Remove requirements to advertise licensing applications in local newspapers</b>		X	
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs for the on and off-trade</b>		X	
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs, but only in respect of overnight accommodation - lodges</b>		X	
<b>Remove or simplify requirements to renew personal licences under the 2003 Act</b>		X	

Score

0

Q44. 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.

	Yes	No	Don't know
<b>Remove requirements to advertise licensing applications in local newspapers</b>	X		
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs for the on and off-trade</b>		X	
<b>Remove the centrally imposed prohibition on the sale of alcohol at MSAs, but only in respect of overnight accommodation - lodges</b>		X	
<b>Remove or simplify requirements to renew personal licences under the 2003 Act</b>		X	

Score

0

Q45. 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 keep your views to a maximum of 200 words.)

*No Response*

Page Score

0

## Page 16: Impact assessments

Q46. Impact assessments for the proposals in this consultation have been published alongside the full consultation document. 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
<b>Minimum unit pricing</b>	X		
<b>Multi-buy promotions</b>	X		
<b>Health as a licensing objective for cumulative impact</b>	X		

<b>Ancillary sales of alcohol</b>	X		
<b>Temporary event notices</b>	X		
<b>Late night refreshment</b>	X		
<b>Removing the duty to advertise licence applications in a local newspaper</b>	X		
<b>Sales of alcohol at motorway service stations</b>	X		
<b>Personal licences</b>	X		

Score

0

Q47. Do you have any comments on the methodologies or assumptions used in the impact assessments? If yes, please specify in the box below, clearly referencing the impact assessment and page to which you refer (keeping your views to a maximum of 400 words).

*No Response*

Page Score

0

## Scoring Summary

Pages	Total
1. About you	0
2. A minimum unit price for alcohol	0
3. A minimum unit price for alcohol	0
4. A ban on multi-buy promotions in the off-trade	0
5. A ban on multi-buy promotions in the off-trade	0
6. Reviewing the mandatory licensing conditions	0
7. Reviewing the mandatory licensing conditions	0
8. Health as a licensing objective for cumulative impact policies	0
9. Health as a licensing objective for	0

cumulative impact policies	
10. Freeing up responsible businesses	0
11. Freeing up responsible businesses	0
12. Freeing up responsible businesses	0
13. Freeing up responsible businesses	0
14. Freeing up responsible businesses	0
15. Freeing up responsible businesses	0
16. Impact assessments	0
<b>Total Survey Score:</b>	<b>0</b>

# Alcohol strategy consultation

User Details - 5463091

**Date Started:** 05/02/2013 11:37:26    **Date Ended:** 05/02/2013 11:49:32

**Time taken:** 12 mins, 6 secs    **IP Address:** n/a

**Unique ID:** n/a

## Page 1: About you

Q1. Please select if you would like your response or personal details to be treated as confidential.

Treat as confidential

Score

0

Q2. Which of the following best describes you or the professional interest you represent? Please select one option from the menu below.

Local government (other)

Score

0

Q3. If you are responding on behalf of an organisation or interest group, please write in the box below the number of members in your group or organisation.

*No Response*

Q4. How did you obtain the views of your members? Please explain in the box below keeping your response to a maximum of 100 words.

*No Response*

Q5. Please indicate in which region you or your organisation is based.

Please select one option from the menu below.

South East England

Score

0

Q6. If you are responding as a member of the public, what is your gender? Please select one option.

*No Response*

Score

0

Q7. If you are responding as a member of the public, what is your age?

Please select one option.

*No Response*

Score

0

Page Score

0

## Page 2: A minimum unit price for alcohol

Q8. In the alcohol strategy, the government committed to introducing a minimum unit price for alcohol in England and Wales. This consultation will contribute to the debate on the most appropriate price per unit and the mechanism by which, once set, minimum unit pricing would remain effective. It is also an opportunity for interested parties to raise other issues around minimum unit pricing. The purpose of minimum unit pricing is to reduce alcohol consumption, particularly by the most hazardous and harmful drinkers who tend to show a preference for the cheapest alcohol products. By doing so the government estimates there will be a reduction in the associated crime and health harms, especially the numbers of hospital admissions, alcohol-related deaths and alcohol-related crimes. Minimum unit pricing is not intended disproportionately to affect responsible drinkers or particular social groups but to reduce the availability of alcohol sold at very low or heavily discounted prices. More information (including the definitions of hazardous and harmful drinkers) is available in the full consultation document and the impact assessment. Do you want to answer questions on minimum unit pricing? Please select one option.

Yes

Score

0

Page Score

0

## Page 3: A minimum unit price for alcohol

Q9. The impact of minimum unit pricing will depend on the price per unit of alcohol. The government wants to ensure that the chosen price level is targeted and proportionate, whilst achieving a significant reduction of harm. The government is therefore consulting on the introduction of a recommended minimum unit price of 45p. The government estimates a reduction in consumption across all product types of 3.3 per cent, a reduction in crime of 5,240 per year, a reduction in 24,600 alcohol-related hospital admissions and 714 fewer deaths per year after ten years. Do you agree that this minimum unit price level would achieve these aims? Please select one option.

No

***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):***

unlikely to impact harmful and hazardous consumers in lower socio-economic groups and may therefore lead to dependent drinkers to prioritise need for alcohol above other payments and commodities creating secondary poverty and problems. Unlikely to impact the behaviours of middle class increasing/higher risk drinkers May only impact U18

Score

0

Q10. Should other factors or evidence be considered when setting a minimum unit price for alcohol? Please select one option.

Yes

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

Unlikely to impact increasing/higher risk drinkers with higher incomes More clarity is needed in the policy in relation to reducing health inequalities, as many staff do not appreciate the need to reduce the large gap in life expectancy between the better off and worse off.

Score

0

Q11. The government wishes to maintain the effectiveness of minimum unit pricing and is therefore proposing to adjust the minimum unit price level over time. 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

Score

0

Q12. 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

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

Lower income groups will be more affected, including poorer older people.

Score

0

Page Score

0

## **Page 4: A ban on multi-buy promotions in the off-trade**

Q13. The government is consulting on introducing a ban on multi-buy promotions in the off-trade (e.g. shops and off-licences) as part of its wider strategy to reduce excessive alcohol consumption, and alongside the introduction of a minimum unit price. A ban on multi-buy promotions would therefore not apply to pubs, clubs, bars or restaurants. The term 'multi-buy promotions' refers to alcohol promotions that offer a discount for buying multiple items. 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. As well as being part of a wider strategy to reduce

consumption and tackle irresponsible alcohol sales, a ban on multi-buy promotions would also contribute to the government's aim of encouraging people to be aware of how much they drink and the risks of excessive drinking, so that they can make informed choices. The aim of this consultation is to assess support for such a ban and contribute to our understanding of the impact a ban on multi-buy promotions may have. The types of promotion it is proposed that a ban would include, are: two for the price of one, three for the price of two, buy one get one free, buy six and get 20 per cent off, 24 cans of lager costing less than 24 times the cost of a single 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, 3 for £10 where each bottle costs more than £3.33. More information is available in the full consultation document and the impact assessment. Do you want to answer questions on a ban on multi-buy promotions in the off-trade? Please select one option.

Yes

Score

0

Page Score

0

## Page 5: A ban on multi-buy promotions in the off-trade

Q14. Do you think there should be a ban on multi-buy promotions involving alcohol in the off-trade? Please select one option.

Yes

Score

0

Q15. Are there any further offers which should be included in a ban on multi-buy promotions? Please select one option.

Don't know

Score

0

Q16. Should other factors or evidence be taken into account when considering a ban on multi-buy promotions? Please select one option.

Yes

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

How will ban be enforced especially in relation to smaller outlets? Give emphasis to encouraging people to drink socially at pubs, especially community pubs not just town centres and chains.

Score

0

Q17. 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.

No

Score

0

Page Score

0

## Page 6: Reviewing the mandatory licensing conditions

Q18. 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 alcohol 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. The government has also committed to consult on whether these mandatory licensing conditions should, where relevant, apply to both the on- and off-trade. This consultation forms part of that review, and will contribute to the government's understanding of how these mandatory conditions are perceived. The five mandatory licensing conditions currently set out in regulations in relation to the supply of alcohol are: a ban on irresponsible promotionsa ban on dispensing alcohol by one person directly into the mouth of anothera requirement to provide free tap water on request to customersa requirement to have an age verification policy to prevent the sale of alcohol to persons under 18 years of age, anda requirement to make available to customers small measures such as half pints or beer or cider or 125ml glasses of wine More information is available in the full consultation document. An explanation of each of these terms can be found on page 20 of the consultation document, in the glossary at the end. Do you want to answer questions on reviewing the mandatory licensing conditions? Please select one option.

Yes

Score

0

Page Score

0

## Page 7: Reviewing the mandatory licensing conditions

Q19. Do you think each of the mandatory licensing conditions is effective in promoting the licensing objectives? For more information on the licensing objectives please see the glossary at the end of the full consultation document. Please select one option (Yes, No, Don't know) from each drop down menu.

	Prevention of crime and disorder	Public safety	Prevention of public nuisance	Protection of children from harm
Irresponsible promotions	Yes	Yes	Yes	Yes
Dispensing alcohol directly into the mouth	Yes	Yes	Yes	Yes
Mandatory provision of free tap water	Yes	Yes	Yes	Yes
Age verification policy	Yes	Yes	Yes	Yes
Mandatory provision of small measures	Yes	Yes	Yes	Yes

Score

0

Q20. Do you think that the mandatory licensing conditions do enough to target irresponsible promotions in pubs and clubs? Please select one option.

Yes

Score

0

Q21. Are there other issues related to the licensing objectives which could be tackled through a mandatory licensing condition? Please select one option.

Don't know

Score

0

Q22. Do you think that 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.

No

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

No – include ban on irresponsible promotions at off-trade

Score

0

Page Score

0

## Page 8: Health as a licensing objective for cumulative impact policies

Q23. We want to ensure that licensing authorities are able to take alcohol-related health harms into consideration when making decisions about cumulative impact policies (CIPs) which can be used to manage problems linked to the density of premises in specific areas. 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. We are proposing 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. We expect that those areas with the highest levels of alcohol-related health harm, or fast rising levels of harm from alcohol, will be most likely to use this power. It 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. More information is available in the full consultation document and impact assessment. Do you want to answer questions on health as a licensing objective for cumulative impact policies? Please select one option.

Yes

Score

0

Page Score

0

## Page 9: Health as a licensing objective for cumulative impact policies

Q24. 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):

A+E attendance

ASB including rowdiness, pub/club noise nuisance, litter/crime data

Q25. 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.

No

Score

0

Q26. 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 your answer in the box below, providing evidence to support your response (keeping your views to a maximum of 200 words):

Reduce ease of availability

Page Score

0

## Page 10: Freeing up responsible businesses

Q27. The government has committed to consult on giving licensing authorities greater freedom to take decisions that reflect the needs of their local community. Following the government's Red Tape Challenge in 2011, three areas of reform were specified: alcohol licensing for certain types of premises providing minimal alcohol sales, temporary event notices (TENs) and the licensing of late night refreshment. This section asks for views on these proposals and suggests further ways to reduce burdens on business. The proposals set out here can be seen alongside work undertaken by the Department for Culture, Media and Sport to remove unnecessary red tape from regulated entertainment. More information on each of these areas for reform is available in the full consultation document. There are five subjects covered in this section. They are: ancillary sales of alcohol occasional provision of licensable activities at community events an extension of the temporary event notice limit at individual premises late night refreshment, and further proposals to reduce burdens on business Do you want to answer questions on freeing up responsible businesses? Please select one option.

No

Score

0

Page Score

0

## Page 11: Freeing up responsible businesses

Q28. Ancillary sales of alcohol For many businesses, the sale of alcohol is only a small part of, or incidental to, their wider activities, and occurs alongside the provision of another product or service (which this consultation refers to as an 'ancillary sale'). For example, a guesthouse might wish to provide wine to its guests with an evening meal or a complimentary bottle of wine in a guest's room, while a hairdresser might wish to offer clients a glass of wine. 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.

**No Response**

Score

0

Q29. If special provisions 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.

*No Response*

Score

0

Q30. 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 suggestions in the box below, keeping your views to a maximum of 200 words:

*No Response*

Q31. 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. Alternatively, a second option is to broaden the definition of 'ancillary sales' to include all businesses (and/or not for profit activities) through the use of a general set of qualification criteria, for example, to the effect that: alcohol must be sold or supplied as a small part or proportion of a sales transaction or contract for a wider service, and the amount of alcohol that could be supplied as part of that contract cannot exceed a prescribed amount. Do you think that the qualification criteria proposed meet this aim?

*No Response*

Score

0

Q32. Do you think that these proposals would significantly reduce the burdens on ancillary sellers? Please select one option in each row.

*No Response*

Score

0

Q33. Do you think these proposals would impact adversely on one or more of the licensing objectives? Please select one option.

*No Response*

Score

0

Q34. 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 response to a maximum of 200 words:

*No Response*

Page Score

0

## **Page 12: Freeing up responsible businesses**

Q35. 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.

*No Response*

Score

0

Q36. What impact do you think a locally determined notification would have on organisers of community events? Please select one option in each row.

*No Response*

Score

0

Page Score

0

## Page 13: Freeing up responsible businesses

Q37. Should the number of TENs which can be given in respect of individual premises be increased? Please select one option.

*No Response*

Score

0

Q38. If you answered yes, please select one option to indicate which you would prefer. Please select one option.

*No Response*

Score

0

Page Score

0

## Page 14: Freeing up responsible businesses

Q39. 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.

*No Response*

Score

0

Q40. 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.

*No Response*

Score

0

Q41. 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).

*No Response*

Page Score

0

## Page 15: Freeing up responsible businesses

Q42. Do you agree with each of the following proposals? Please select one option in each row.

*No Response*

Score

0

Q43. Do you think that each of the following would reduce the overall burdens on business? Please select one option in each row.

*No Response*

Score

0

Q44. 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.

*No Response*

Score

0

Q45. 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 keep your views to a maximum of 200 words.)

*No Response*

Page Score

0

## Page 16: Impact assessments

Q46. Impact assessments for the proposals in this consultation have been published alongside the full consultation document. 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
Minimum unit pricing		X	
Multi-buy promotions	X		
Health as a licensing objective for cumulative impact	X		
Ancillary sales of alcohol	X		
Temporary event notices	X		
Late night refreshment	X		
Removing the duty to advertise licence applications in a local newspaper	X		
Sales of alcohol at motorway service stations	X		

<b>Personal licences</b>	X		
--------------------------	---	--	--

Score

0

Q47. Do you have any comments on the methodologies or assumptions used in the impact assessments? If yes, please specify in the box below, clearly referencing the impact assessment and page to which you refer (keeping your views to a maximum of 400 words).

*No Response*

Page Score

0

## Scoring Summary

Pages	Total
1. About you	0
2. A minimum unit price for alcohol	0
3. A minimum unit price for alcohol	0
4. A ban on multi-buy promotions in the off-trade	0
5. A ban on multi-buy promotions in the off-trade	0
6. Reviewing the mandatory licensing conditions	0
7. Reviewing the mandatory licensing conditions	0
8. Health as a licensing objective for cumulative impact policies	0
9. Health as a licensing objective for cumulative impact policies	0
10. Freeing up responsible businesses	0
11. Freeing up responsible businesses	0
12. Freeing up responsible businesses	0
13. Freeing up responsible businesses	0
14. Freeing up responsible businesses	0

15. Freeing up responsible businesses	0
16. Impact assessments	0
<b>Total Survey Score:</b>	<b>0</b>