

Alcohol strategy consultation

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Page 1: About you

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

No Response

Score

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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:

Blackburn with Darwen Public Health Directorate on behalf of Blackburn with Darwen Clinical Commissioning Group

Score

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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

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

No Response

Score

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

No Response

Score

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Page Score

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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

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Page Score

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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):

Blackburn with Darwen (BwD) Director of Public Health (DPH), the licensing department and the overarching local authority are fully supportive of a minimum unit price (MUP) of at least 50p. The evidence is strong and clear, having the greatest impact on those most at risk, the heavier drinkers, that over a 10 year period, a 50p MUP will: o SAVE 42,500 crimes, which is 18,400 more than 45p MUP level.

o SAVE 442,300 days absent from work, which 176,000 more than 45p MUP level. o SAVE 97,700 hospital admissions, which is 31,500 more than 45p MUP level. o SAVE 3,060 lives, which is 1,020 more than 45p MUP level. (University of Sheffield, 2009 model) These are not only significant savings of financial and health benefits, but also benefits to the local communities, reducing anti-social behaviour crime; benefits for society and the overall economy. Furthermore, it only costs the moderate drinker, i.e. the majority of the population, 6p per week more than a 45p MUP level. The Chief Medical Officer's report of 2008 called for a MUP of 50p, and within that, BwD Local Authority, is supportive of this MUP. Furthermore, all 24 DsPH across the North West support this 50p MUP.

Score

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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):

Urgent action is needed to reduce the impact that cheap alcohol has on society and to reduce the costs of alcohol misuse for all involved. Alcohol-related harm is estimated to cost around £21 billion/year, England, comprising NHS costs, alcohol-related crime and lost productivity due to alcohol. If the costs of wider social harm, i.e. effect on children were included costs would be considerably higher. Alcohol is associated with over 60 medical conditions; deaths directly related to alcohol rose by 22% between 2001-2010. Canadian evidence shows MUP to reduce alcohol consumption, mainly in those who are heavier drinkers. As the price increased by 10%, consumption decreased by 8.43% and, alcohol-related harm reduces. Therefore, MUP will contribute to the overall reductions in preventable mortality. MUP must reflect the growing affordability of alcohol; thus the price level should be regularly reviewed as inflation changes. On-trade premises will benefit from MUP: reduces differential in price between on and off-trade, thereby creating a shift in drinking patterns to on-trade premises which is safer, more regulated environment, and positive to community pubs, the closure of pubs is important to CAMRA. The MUP should be in line with Scotland; 50p, to reduce cross boundary issues.

Score

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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

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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 are many groups who would be affected by MUP including: Children/Young People would benefit and better protected from alcohol harms by reducing affordability (i.e. pocket-money priced alcohol) and fewer are likely to be exposed to parental alcohol misuse and poor role model and alcohol would be de-normalised. Frontline workers by reducing alcohol-fuelled assaults and less drunken violence towards ambulance, A&E, police staff and the resource to deal with such issues. Communities by reducing crime, social disorder and improving safety of community spaces; nearly half of people in North West are too afraid to enter town centres. Reducing harm would reduce crime and fear of crime. Community pubs: likely to benefit.

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Page Score

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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

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Page Score

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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

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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 is not an ordinary product: it causes significant health and social harms, thus should be treated differently to other products. Any promotion that offers an incentive to buying more alcohol than intended should not be permitted including: o Promotions offering money off individual items. o Multi-buy/volume-based promotions in the on-trade as well as the off-trade. o Loyalty point schemes such as those offering points for alcohol purchases or other reward system for alcohol purchases. Any control must be robust enough to cover any promotion so that it would prevent the actual cost of alcohol falling below a 50p MUP.

Score

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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):

University of Sheffield research indicates that a ban on price discounts/multi-buy promotions alongside a MUP of 50p (at 2009 prices) would have a far greater impact than MUP alone, e.g. 50p MUP and off-trade discounting ban results in further reduction of consumption; greater reduction of hospital admissions; larger fall in alcohol-related crime; bigger reduction in unemployment. Reduced consumption would improve health inequalities as lower income groups suffer greater health harms. Young people are attracted to buy alcohol via price promotions; a ban would protect young people. Trading standards need a strengthened operation to monitor and enforce multi-buy ban effectively.

Score

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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):

o Young people: less incentivised to drink more; reduced access and availability of alcohol in home environment. o Frontline services: i.e. police, ambulance services, doctors/hospitals; dealing with fewer cases of alcohol-related harm freeing up time and resources. o People on low incomes: disproportionately affected by alcohol-related harm; e.g. alcohol-related death are 45% higher in areas of high deprivation. o The Licensed Trade (Public Houses/community pubs) may benefit from re-balanced purchasing as they struggle to compete with cheap supermarket prices. o Communities: reduced anti-social behaviour as a result of cheap alcohol sold and consumed on the streets or in public places.

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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

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Page Score

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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	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

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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):

Mandatory conditions do not go far enough; promotions encouraging people to consume more than intended should be prohibited, i.e. price-based promotions; happy-hours; alcoholic drinks cheaper than non-alcoholic drinks. Challenging irresponsible promotions: currently impacted by need to demonstrate link between irresponsible promotion and crime/disorder, restriction should be removed Remove the 'glamorisation' test for promotions and ban all irresponsible promotions. Unit content of all drinks: clearly visible at point of sale. Age verification schemes; minimum 'challenge 25', written policy and include mandatory signage on premises. Licensees should train/re-train staff: Accredited to a national standard for safe & responsible retailing of alcohol.

Score

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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):

- Price of soft drinks should be cheaper than the cheapest alcoholic drinks to remove incentives for people to drink alcoholic drinks. Active promotion of soft drinks.
- Mandatory training to sell alcohol, including training on verification of age.
- Bottled drinks to be decanted from bottles at the bar; removal of bottles provides a safer drinking environment.
- All premises (on and off trade) to operate a 'challenge 25' policy.
- Equal controls for promotions applicable to both the 'on' and 'off' trade.
- Promotions that clearly

target younger drinkers should be banned. • Upselling should be prohibited. • Promotion of small measures to be encouraged.

Score

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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 sales of alcohol are now dominant over on-trade sales; supermarket alcohol sales account for 70% of off-trade sales and sells alcohol at discounted prices. Stopping such discounted prices would discourage 'pre-loading'/binge drinking of alcohol purchased from the off-trade. People who pre-load are more likely to be a victim or perpetrator of crime. Irresponsible promotions condition should be across both 'on' and 'off' trade. Licensing conditions should be updated to reflect the balance of off-trade and on-trade drinking patterns, and such conditions should be appropriate to the level of need.

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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

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Page Score

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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):

Cumulative Impact Policy (CIP) could be supported by information or data on alcohol related health harms for the Joint Strategic Needs Assessment and would include:

- o A&E/urgent care centre/Walk-in-centre data.
- o Ambulance data.
- o Paramedic data.
- o GP 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 Programme Data.
- o Other hospital admissions data, i.e. specific (drunkenness) and non-specific (cancer).
- o Map out premises and correlate alcohol-related admissions.
- o Domestic abuse data including child protection issues.
- o Alcohol related crime figures.

CIP process has potential to introduce a shift in responsibility in licensing; currently licensing/responsible authorities must raise representations against licence applications using robust evidence to support this. CIP operates under the premise that a licence will be automatically declined (in designated areas) unless the applicant can demonstrate that the license would not add to the cumulative (health) impact in that area. An important part of any research will be mapping health data at a local level in relation to outlet density.

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):

- o Under current licensing law only the Police can raise an objection to a license application using a cumulative impact policy process. This could be broadened to include all of the licensing responsible authorities and their evidence.
- o If a health objective was added to the existing licensing objectives health based responsible authorities could use the CIP process for applications where health impacts are evident. Providing effective guidance on how to incorporate and interpret public health data would be essential to support changes in process.

Score

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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):

- o 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 clear local links between alcohol and health harm to be better established.
- o 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 A saturation of licensed premises, i.e. town centre, 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
- o The World Health Organisation has reported that availability effects levels of harm therefore Licensing Authorities should be able to control the availability of alcohol.
- o BwD has poor alcohol-related harms, mortality, months of life-lost and crime. BwD is 4th from highest

position in the table showing numbers of alcohol related hospital admissions in the NW.

Page Score

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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

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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 of certain types of business and the kinds of sales they make		X	
The provision should be available to all businesses providing they meet certain qualification criteria to be an ancillary seller		X	
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		X	

Score

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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
Accommodation providers, providing alcohol alongside accommodation as part of the contract		X	
Hair and beauty salons, providing alcohol 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

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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 there will be no way of ensuring they are providing alcohol sensibly. This proposal goes against the heightening of responsibility in terms of alcohol within the on and off-trade and indeed the wider general public. 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.

Any sale of alcohol should be regulated; no types of premises for alcohol sales that should be unregulated. Unregulated alcohol sales would create: unenforceable objectives of Licensing Act 2003. The licensed sale of alcohol 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: create a category outside Early Morning Restriction Orders/Late Night Levy and CIPs, creating confusion for consumers/enforcement officers and lead to increased costs for public sector organisations dealing with the harmful effects of 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):

There should be no exceptions. This provision represents a real risk that alcohol becomes even more normalised, thus failing 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. The provision may force other businesses who provide the same service (e.g. hairdressers in same locality) to introduce or increase the provision of alcohol in order to compete. We don't agree with the 'ancillary seller' status because there is no mechanism to police these businesses' activity, 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. Furthermore, people purchasing from 'ancillary seller' need to understand they are purchasing from unregulated 'ancillary seller' and thus not necessarily making a

reputable or safe purchase, for example safeguarding underage sales.

Score

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

Score

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

Score

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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:

Our consideration is in relation to the fragmentation of Licensing Act 2003, which would create a system open to abuse.

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.

Under these proposals, who would be responsible for ensuring alcohol is not sold to children or people who are already intoxicated; training is available to staff; that staff are protected from abusive/intoxicated customers; that the business is run in support of the licensing objectives.

Page Score

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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

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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

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Page Score

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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

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

No Response

Score

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Page Score

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

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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	
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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.)

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. Although the sale of alcohol should be the first choice on the list of licensable activities and not the last; and, if the application forms in relation to regulated entertainment could be simplified.

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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).

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 North West England has been calculated to be more than £3 billion; which 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

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