

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.

Treat as confidential

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.

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

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.

North East England

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):

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

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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):

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

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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

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

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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 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

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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):

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

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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):

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.

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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	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				
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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):

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

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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):

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

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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):

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

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Page Score

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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):

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

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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

Score

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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.

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
Accommodation providers, providing alcohol alongside accommodation as part of the contract		X	
Hair and beauty salons, providing alcohol alongside a hair or beauty treatment		X	
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:

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

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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.

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
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			

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

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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
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

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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 – 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
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.

No Response
Score
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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.)

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

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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).

No Response

Page Score

0

Scoring Summary

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8. Health as a licensing objective for cumulative impact policies	0
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