

# Alcohol strategy consultation

User Details - 5466849

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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.

Local government (other)

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

Warwickshire Drug and Alcohol Action Team

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.

West Midlands

Score

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

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

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55-64  
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 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 would be an effective approach that would have the greatest impact on younger and heavier drinkers. However, if a minimum price was to be introduced it would make sense to aim for a higher minimum price of 50p. According to the University of Sheffield the effects of a minimum unit price of 50p compared to 45p would ultimately save an additional 1,000 deaths; 31,000 alcohol-related hospital admissions; 18,000 crimes per year and would reduce consumption by a further 2.4%. The Faculty of Public Health (of which I am an Honorary Member) supports the call for a minimum unit price of 50p for alcohol in their "12 Steps to a Better Health Manifesto". Consideration needs to be given to consistency within the United Kingdom. Should different

al pricing between Scotland and England occur this may impact on cross-border purchases.

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):**

If adopted, minimum pricing should be seen (and promoted) as one part of a comprehensive approach to tackling misuse of alcohol. The minimum price should have some relevance and reference to affordability. Considerations should be given to what the additional revenues might be able to contribute towards.

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):**

Children and young people – although few young people are drinking those that do are often doing so to excess. Drinking consuming less. Young people are sensitive to price and so a minimum unit price will reduce consumption and thereby the risk of excessive consumption shaping behaviour. In addition there will be reduced number exposed to parental alcohol misuse. Children will also receive additional protection in the family context – alcohol has been identified as a factor in around 40% of child protection cases. Victims of domestic abuse, where at least 30% of which are linked to alcohol, will have reduced risk. Alcohol related crimes; antisocial behaviour and violence will be reduced. Resulting in fewer crimes, victims of crime and reduced fear of crime. There will be a reduced demand for front-line services e.g. reduced assault on A&E and police staff, time and money saved dealing with excessive alcohol misuse. Reduced costs for dealing with the effects of misuse of alcohol will result in benefit to taxpayers. (Total costs for Warwickshire estimated to be £300m) Community pubs and bars will be able to compete on a more level basis with off-licence sales and irresponsible drinks promotions would be reduced.

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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 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):***

We support a ban on multi-buy promotions in the off-trade. This proposal has problems in that regulations would need to be worded in a way to avoid loopholes. Any incentive to purchase and consume more than intended – such as money off or reduction on other products or services or voucher points – should be prohibited. Other examples of potential ways around this proposal include 'Meal deals' or offering free alcohol on rail or air 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

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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):***

Consistency and avoidance of loopholes. Any inconsistency will be exploited by those wishing to circumvent the principle of this proposal. A ban on multiple promotions would go hand-in-hand with minimum pricing proposals. It should be used to reduce the impression that alcohol is a normal part of grocery shopping and along with other measures reduce the risk of young people buying larger quantities of alcohol in order to get drunk. Alcohol is frequently used as a 'loss leader' in supermarket promotions – contrary to public health principles.

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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):*

Community pubs would benefit as they are currently struggling to compete with cheap supermarket prices. 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.

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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

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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

<b>Dispensing alcohol directly into the mouth</b>	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

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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 mandatory conditions are having limited effect and need amending. In particular the condition relating to irresponsible promotions with clause referring to the need to 'demonstrate a link with crime and disorder' makes this provision virtually impossible to apply. The condition relating to the age verification policies should stipulate the need for a written policy which is advertised within the venue. Anything which encourages greater consumption than intended should not be allowed, including low price-based promotions; Other incentives, e.g. meal deals or voucher schemes; organised pub crawls (especially those 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 a table; promotion of drinking games.; offering an alcoholic drink cheaper than a non-alcoholic one without alcohol. 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

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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):*

Age verification training Requirement to keep and maintain a refusals book Till prompts re age verification and wider adoption of schemes such as Challenge 25 Mandatory training for those who sell alcohol Provision and promotion of lower strength beers and wines at competitive prices Active promotion of soft drinks at reasonable and consistent prices (e.g. the lemonade in a pint of shandy) Unit information (including recommended limits) at Point of sale.

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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 problem of alcohol harm are increasingly associated with cheap alcohol sold from off licence premises. More alcohol being purchased from supermarkets and consumed at home increases risk of issues around domestic abuse and child protection. Pre-loading (drinking before going out to reduce costs) has become endemic in many groups especially the young. 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. Irresponsible promotions and the provision and promotion of smaller measures could both be applied to the off-trade

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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

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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):

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 and antisocial behaviour figures • Local data sources, e.g. residents' surveys. Public health should be a licensing objective in its own right and not tied to CIPs. The fact that the alcohol industry is already taking action as part of the Responsibility Deal does not remove the need for health to be included in the CIP. We have evidence from the delays from the tobacco industry with regard to 'voluntary' measures. Legislation would ensure consistency and timeliness. However, it may be difficult to tie public health data to specific locations such as a licensed premise, particularly an off licence. Experience in Scotland suggests that public health data should be used to underpin over-riding provision policies covering entire local authority areas to ensure the overall availability of alcohol is taken into account.

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):*

Scale of problems can seem diminished when measured at ward level or lower. It may be more practical for public health objectives to be linked to borough-wide saturation policies as this is the level at which data becomes meaningful. Through this approach councils could oversee their areas and thereby fulfil their new responsibility for public health.

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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):

Introducing a public health objective, particularly to support over-provision or saturation policies at the borough/district-wide level, would enable licensing decisions to be made taking into account the full impact of alcohol harm within the five council's boundaries. This approach has been adopted with some success in some areas of Warwickshire. 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. It would evidence the hidden harm of alcohol consumption in terms of home drinking. 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

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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 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.

	Yes	No	Don't know
The provision should be limited to a specific list of certain types of business and		X	



the kinds of sales they make			
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		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

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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:

The 'ancillary license' provisions directly contradict the direction of travel set out in the Police Reform and Social Responsibility Act which, through measures such as the Night Time Levy and Early Morning Restriction Orders sets out to give localities greater power to restrict the availability of alcohol in their own neighbourhoods.

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):**

What is the legal definition of 'small part of, or incidental to'? 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 need to investigate premises to ensure that they are still eligible to be classed as an ancillary seller would add a burden to local authorities.

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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
<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

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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
<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

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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:

There needs to be accountability for selling alcohol. It is not clear how these proposed arrangements would ensure that someone was responsible for ensuring alcohol is not sold to children or people who are already intoxicated; that training is provided to staff; that the business is run in support of the licensing objectives. Enforcement of provisions would be very difficult with no responsible person.

Community premises are generally non-profit making whilst 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.

The proposed legislation would provide loopholes for irresponsible businesses to exploit and abuse.

The proposal to withdraw the annual fee for ancillary sellers would again put a burden on local authorities. A previous consultation introduced the ability to set fees to cover costs, yet with this proposal, a significant number of premises would be exempt.

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

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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	

Score

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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

Score

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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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<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

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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.

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

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
<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

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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		

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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
<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 requirement to advertise in local newspapers is outdated and inefficient. It should be replaced with alternative online advertising (e.g. Licencing Authority sites)

The need for a personal licence underlines the importance of alcohol sales.

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
<b>Minimum unit pricing</b>		X	
<b>Multi-buy promotions</b>			
<b>Health as a licensing objective for cumulative impact</b>		X	
<b>Ancillary sales of alcohol</b>		X	
<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>			

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).

Costs for alcohol related harm may be underestimated

There is no rationale for the 45p minimum unit price over any other figure.

public health as an objective should be ranked alongside the other four licensing objectives and not tied to CIPs

the section on "Minimal" sales is highly ambiguous and provides no reassurance that loopholes would not be created. Local decisions by licensing authorities are likely to be subject to legal challenge, an expensive process for local authorities, especially given the current economic climate.

## Scoring Summary

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3. A minimum unit price for alcohol	0
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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>