

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.

A report outlining suggested responses the key areas of the consultation was presented to Warrington's Health and Wellbeing Board for comment and approval and also circulated to members of the DAAT and Crime and Disorder Partnership for comment. The following response has therefore been informed and approved by these strategic bodies in Warrington.

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

North West 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):

Agree that a minimum unit price of 45p would achieve the aims above, but believe that a minimum unit

price of 50p would achieve far better outcomes as evidenced by the ScHARR model (University of Sheffield, 2009), which found that after 10 years, a 50p level would save 3,060 lives (1,020 more than at 45p); 97,700 hospital admissions (31,500 more); 442,300 days absent from work (176,00 more) and 42,500 crimes (18,400 more). A MUP of 50p is also supported by the 24 Directors of Public Health in our region.

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):

* Pubs, bars and other on-trade premises will greatly benefit from a minimum price as it would reduce the differential in prices retailed in the off-trade and on-trade. Evidence suggests that this would result in a shift of drinking patterns to on-trade premises which is a safer, regulated environment to consume alcohol and positive for community pubs. * The Scottish Government is proposing a minimum unit price of 50p creating a potential cross border issues if the price level is 45p in England. * The price level should be regularly revised to ensure that alcohol doesn't become more affordable. * Additional money earned by retailers should be recouped by the Treasury and directed to local services which reduce alcohol harm. * It is important to recognise that MUP could contribute to an increase in the production and availability of illicit alcohol which will need to be monitored and addressed.

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 would be better protected from alcohol harms by reducing access to pocket-money priced alcohol. In the 2011 Trading Standards North West Children's Survey, 13% of 14 year olds and a massive 57% of 17 year olds were able to purchase alcohol themselves. 23% of 14 to 17 year olds claimed to drink more than 20 units per week. * There would be a positive effect on offenders - 63% of male offenders are problem drinkers. * Local community pubs. Cheap alcohol in the off-trade has contributed to the decline of the local British pub. Recent surveys have highlighted that the majority of pub landlords support MUP.

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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):

* As a general principle, the purchase of any goods should not be linked to the purchase of alcohol at a lower than normal sale price. * Buying goods and getting alcohol discounted or free which would fall below a minimum unit price of 50p. * Multi-buy promotions in on-trade premises should end to be consistent with the off-trade. * There should be consistency of price per volume of a product regardless of the size or quantity of packaging that alcohol is sold in. * Loyalty point schemes and money off coupons which are in anyway linked to alcohol.

Score

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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):

* There is a far greater impact of the multi-buy ban policy when enforced alongside a minimum unit price of 50p. * Marketing of alcohol should be legislated for ensuring that it does not circumvent the spirit and

intention of this legislation. * An Alcohol Concern and Balance report of 16-24 year olds found that promotions encouraged more drinking. A multi-buy ban would protect more children and young people. * Multi-buy promotions encourage people to buy more alcohol than they intend resulting in easier access to alcohol in the home environment. We already know that children and young people access alcohol from the home more than any other place so a ban would reduce this access. * Trading Standards needs a strengthened operation to monitor and enforce a multi-buy ban effectively as it is unlikely that relying on consumers policing the ban will be effective enough. * Reduced consumption would improve health inequalities as lower income groups suffer greater health harms.

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 would benefit as they would be less incentivised to drink more than they otherwise would choose to. * Frontline services such as police, ambulance services and hospitals would be dealing with fewer cases of alcohol-related harm freeing up their time and resources. * People on low incomes would benefit as they are disproportionately affected by alcohol-related harm. Alcohol-related death rates are 45% higher in areas of high deprivation. This is despite people in lower socio-economic groups consuming less than those in higher ones. * Pubs could benefit as people are less likely to pre-load on alcohol bought from off-licence premises and shift their consumption of alcohol to on-licence premises.

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

Yes

Score

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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):

* Remove the 'glamourisation' test for promotions and ban all irresponsible promotions. * Remove the 'need to demonstrate a link with crime and disorder' clause relating to irresponsible promotions as it is too restrictive. * The unit content of all drinks should be clearly visible at the point of sale so customers know what they are drinking. * Age verification schemes should be a minimum 'check 25', have a written policy and include mandatory signage on premises. * Licensees should train and re-train their staff to be accredited to a national standard for the safe and responsible retailing of alcohol. * The Code should be extended to restrict promotions of all types that encourage excessive consumption such as irresponsible promotions including 'Buy 2 large glasses and get the rest of the bottle free', and '2-4-1 on cocktails'. * Volume discounting or incentives to buy more alcohol than might otherwise be purchased should be prohibited, including voucher/reward card deals which are becoming increasingly common, as should promotions that cut prices for a specified time e.g. happy hours. * Promotions that encourage excessive drinking in pubs and clubs where organised by a third party such as bar crawls, should also be prohibited.

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):

* A proportionate seating and standing ratio should be dictated by the capacity of the premises. * Recommend an additional mandatory condition that would ensure that soft/non-alcoholic drinks be made available at reasonable prices e.g. at least one soft drink (not free water) to be cheaper than the cheapest alcoholic drink. * A ban on irresponsible drinks promotions should be applied to the off-trade. * Loyalty point schemes for the purchase of alcohol which encourages increased consumption should be banned. * Offering shots of spirits away from the bar area (e.g. table to table selling of shots of pre-poured vodka) should be banned. * Happy hours should be banned as they sell discounted alcohol. * Ladies nights,

(where there are discounted or free drinks) should be banned as they encourage excessive consumption of alcohol. * Drinking games should be banned.

Score

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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):

* There should be as many or as few mandatory licensing conditions as deemed appropriate by the Government. This should include extending the ban on irresponsible drinks promotions to cover off-trade licensed premises to create a consistency across the on and off trades. * Supermarket alcohol sales now account for 70% of off-trade sales and can sell alcohol at discounted prices. Stopping irresponsible promotions would also help to tackle pre-loading and binge drinking of alcohol purchased from the off-trade. People who have pre-loaded are more likely to be a victim or perpetrator of crime. Therefore ensuring that alcohol at such premises is sold and promoted responsibly is relevant to the effective management of a safe night-time economy.

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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):

Current guidance accompanying the Licensing Act 2003 asserts that licensing authorities, when establishing the evidence base for a CIP, can draw upon health-related statistics, such as alcohol-related emergency attendances and hospital admissions. Such statistics will be relevant when considering alcohol-related health harms, but will be dependent on their quality and availability.

We recommend that the Government develops and introduces standard systems to more effectively measure and record the levels of alcohol-related harm for all patients in both accident and emergency departments, and via hospital admissions.

In addition to this more robust A&E and hospital data, we recommend that an effective Joint Strategic Needs Assessment would also include:

- * Ambulance data
- * Paramedic data
- * GP data
- * Urgent care/walk in centre data
- * Treatment data including specialist treatment
- * Demand/unmet demand for alcohol treatment
- * Alcohol related mortality (including suicides and self harm)
- * Mental health and wellbeing indices
- * Foetal Alcohol Spectrum Disorders data
- * Home Office monitoring data on violence
- * Trauma and Injury Intelligence Group data from the North West Public Health Observatory
- * Domestic abuse data including child protection issues

Public health should be a licensing objective in its own right and not tied to CIPs. This would not be disproportionate as suggested in the impact assessment, and would play a role in the economic development and health of an authority area. Experience from Scotland suggests that public health should be taken into consideration across the whole authority area rather than at smaller scale when assessing the over-provision of alcohol to take into account all points of sale.

Q25. Do you think any aspects of the current cumulative impact policy process would need to be amended to allow consideration of data on alcohol-related health harms? Please select one option.

Yes

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

Currently only the police can object to licence applications due to a Cumulative Impact Policies (CIP). We believe that all responsible authorities should be able to object to the application therefore widening the process to consider health data and the impact on health harms. For example if there is a health harm issue but no crime issue, health bodies may object on the grounds of a CIP. As noted in question 13, public health and assessment of over-provision of alcohol should be considered across the authority area as consideration at ward level could be insufficient and not take into account sales from neighbouring wards. Rather than tying the consideration of health harm to CIPs, we recommend including the protection of public health as a fifth licensing objective.

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):

Health-harms data should always feed into licensing decision-making. Allowing licensing authorities to consider alcohol-related health harms will provide them with an additional, and much-needed, tool to proactively refuse new applications/extensions on the basis of local health considerations. Consequently, they will be enabled to more effectively control the availability of alcohol, and the density of outlets selling

alcohol, within their locality. Increased availability of alcohol has been shown to exacerbate alcohol-related problems, whilst several international studies have shown a link between high outlet density and physical violence.

In addition to the impact on controlling alcohol related crime the health data can impact upon all policy areas and licensing objectives giving stronger evidence and improving the all round data picture to set a baseline and allow for more informed decision making, e.g. alcohol related assaults reporting to A&E but not to the police.

Including health data in consideration of a CIP would enable local links between alcohol and health harm to be better established.

There will be a positive impact on people's mental health and wellbeing because there is less violence, improving healthiness of the population, increased life expectancy and increased economic productivity.

Where there is a saturation of licensed premises, for example in a city centre, competition drives down the price of alcohol which encourages additional consumption. An authority wide over-provision policy backed by public health would lessen 'competition by price' and so limit availability of alcohol to young people, which is an indicator of harm.

The World Health Organisation has reported that availability effects levels of harm therefore Licensing Authorities should be able to control the availability of alcohol.

Page Score

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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.

	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		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:

In principle, we disagree with the 'need to free up business' in relation to alcohol. It should not be treated as an everyday, ordinary product.

Any sale of alcohol should be regulated. Therefore there are no types of premises for alcohol sales which should be unregulated. Unregulated alcohol sales would create a situation where the objectives of the Licensing Act 2003 would be unenforceable. The licensed sale of alcohol also protects and ensures a standard of 'due diligence' is adhered to by people selling alcohol.

Such procedures should not be regarded as 'burdens' but as a necessary tool to ensuring that sales of alcohol are undertaken responsibly and in accordance with the licensing objectives, and as a means of effectively controlling the availability of alcohol, a key mechanism in reducing alcohol-related harm.

This proposal would create a third tier of licensed premises as it would create a category outside Early Morning Restriction Orders/Late Night Levy and CIPs. This would create confusion for consumers and enforcement officers and lead to increased costs for public sector organisations dealing with the harmful effects of alcohol.

This extra category of licensed premises could be contributing to the harm of excessive alcohol consumption but would not contribute to the costs, for example through a Late Night Levy being applied to licensed premises.

We therefore recommend that no changes are made to this aspect of licensing procedure.

Q31. The aim of a new 'ancillary seller' status is to reduce burdens on businesses where the sale of alcohol is only a small part of their business and occurs alongside the provision of a wider product or service, while minimising loopholes for irresponsible businesses and maintaining the effectiveness of enforcement. Alternatively, a second option is to broaden the definition of 'ancillary sales' to include all businesses (and/or not for profit activities) through the use of a general set of qualification criteria, for example, to the effect that: alcohol must be sold or supplied as a small part or proportion of a sales transaction or contract for a wider service, and the amount of alcohol that could be supplied as part of that contract cannot exceed a prescribed amount. Do you think that the qualification criteria proposed meet this aim?

No

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

We don't agree with the 'ancillary seller' status because there is no mechanism to police these businesses, and ensure that they retail alcohol responsibly. The scheme would also take the sale of alcohol out of the remit of the four objectives of the Licensing Act 2003 and the proposed objective of 'Public Health' thus undermining the Licensing Act. The 'ancillary sellers' of alcohol in the retail environment would not come under the same protection afforded by the Licensing Act or necessarily receive appropriate training therefore creating a three tier system which cannot be monitored, supported or enforced. In addition people purchasing from an 'ancillary seller' need to understand they are purchasing from an unregulated 'ancillary seller' and are therefore not necessarily making a reputable or safe purchase, for example safeguarding underage sales.

Score

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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:

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. Furthermore:

* Removing the need for a personal licence holder: It is essential that Police Officers, Fire Officers, and licensing officials can immediately identify the Designated Premises Supervisor as a person in a position of authority at any premises selling or supplying alcohol. This is to ensure that any licensing problems arising at a particular premise can be addressed swiftly by engaging with this key individual. A personal licence holder should continue to be required regardless of whether or not the sale of alcohol forms a central part of the premise's business.

* Removing the need for a premises licence: We do not support this proposal and are also concerned that removing the need to advertise will disadvantage local residents who may wish to object to additional premises being permitted to sell alcohol in their area. We do not support removing one of the key mechanisms by which local residents are notified of, and can subsequently object to, premises wishing to sell alcohol in their community.

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

Score

0

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
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.

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).

Accommodation - if you are serving to a guest of a patron and premises that are just serving hot food and hot drinks (non-alcoholic).

Page Score

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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		X	

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

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			
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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.)

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.

We think it should be as easy as possible for members of the public to make their views known on licensing applications and decision making and suggest this process is determined locally. Any system should seek to engage the public as much as possible through whatever means is most successful.

We do not support removing the prohibition of alcohol sales at motorway service areas. Indeed, it would be in the best interests of all road users to dissociate alcohol completely from driving, given that there were nearly 10,000 drink-drive casualties in Great Britain in 2011

Page Score

0

Page 16: Impact assessments

Q46. Impact assessments for the proposals in this consultation have been published alongside the full consultation document. Do you think that the impact assessments related to the consultation provide an accurate representation of the costs and benefits of the proposals? Please select one option in each row.

	Yes	No	Don't know
Minimum unit pricing		X	
Multi-buy promotions		X	
Health as a licensing objective for cumulative impact			X
Ancillary sales of alcohol			X
Temporary event notices			X
Late night refreshment			X
Removing the duty to advertise licence applications in a local newspaper			X
Sales of alcohol at motorway service stations			X
Personal licences			X
Score			
0			

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

* A minimum unit price for alcohol - The Impact Assessment does not explain why 45p has been chosen as the recommended minimum price. The House of Commons Health Committee report on the Government's Alcohol Strategy states that "If the minimum unit price in England were to be fixed at a different level to that in Scotland, we would expect the evidence supporting that decision to be set out clearly".

The Impact Assessment uses new methodology to work out the benefits of a MUP of 45p but provides no comparison of alternative levels of MUP such as 50p. While we understand that the new methodology takes account of inflation the Impact Assessment should have published the proposed benefits of a 50p MUP.

* Health as an objective for cumulative impact - We support enabling local authorities to take wider alcohol-related health harm into account in licensing decisions. Outlet density is linked to increased rates of consumption and alcohol-related violence, and research commissioned by Alcohol Concern shows a positive correlation between the density of off-licensed premises and harm from alcohol in underage drinkers. Heavy drinking, however, does not just occur in areas of high outlet density. A survey carried out in Wales by Alcohol Concern found that 50% of drinkers only ever drink alcohol at home, and these are likely to be spread out across the licensing authority area. Moreover, some local authorities in England and Wales have chosen not to implement cumulative impact policies in their areas. Given the well-documented health risks of regularly consuming above recommended guidelines, we recommend

introducing the protection of public health as a fifth licensing objective, which would be more effective than restricting consideration to cumulative impact areas and applicable to all local authorities.

* Ancillary sellers - An outcome of Option 2 will be up to 9,116 new premises with the ability to sell alcohol. If this figure is accurate, it will likely represent a significant increase the availability of alcohol. A recent review of the most effective mechanisms to achieve a positive change in our drinking culture noted that previous relaxations in licensing laws governing availability have probably been a major factor in increased alcohol consumption and related harms. Any measures likely to increase the availability of alcohol within communities would therefore be unwise.

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