

Derwent Valley Partnership (AAP)

Alcohol Consultation Response

January 2013



The Government wants to ensure that the chosen minimum unit price level is targeted and proportionate, whilst achieving a significant reduction of harm.

Consultation Question 1: Do you agree that this MUP level would achieve these aims? (Please select one option)		
Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	Don't know <input type="checkbox"/>
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)		
<p>Health and Wellbeing is a key priority for our Partnership. Alcohol and the harm it causes is a theme underpinning all of our priorities. Whilst we agree that a minimum unit price is a targeted and proportionate approach in helping to reduce those harms we feel that the level being consulted on by the Government at this time is too low. We believe that a MUP of 50p will impact more on higher risk and younger drinkers without affecting lower risk drinkers. The additional 5p we feel would be worth the additional lives saved, hospital admissions reduced, crime and disorder reduced and the reduced burden on our increasingly stretched public services.</p>		
(words: 114)		

Consultation Question 2: Should other factors or evidence be considered when setting a minimum unit price for alcohol? (Please select one option)		
Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	Don't know <input type="checkbox"/>
If yes please specify in the box below (keeping your views to a maximum of 200 words)		
<p>We believe strongly that any additional revenue or taxation raised through the implementation of a minimum unit price should be channelled back to the communities, such as ours, where alcohol causes considerable harm, not only in terms of crime and disorder but on health and on the aspirations and attainment of our young people.</p> <p>Although we are in a time of recession currently we feel that the minimum price needs to be monitored to ensure that alcohol does not become more affordable in any future more affluent times that we may have.</p> <p>We know that in this area a large majority of the population drinks at a level that will cause themselves physical and/or psychological harm. Targeted action at a population level needs to be taken to turn back this tide.</p> <p>The number and rate of under-18 alcohol specific hospital admissions remains high and intervention is needed to put alcohol out of the reach of our young people.</p> <p>Alcohol costs our economy in County Durham over £189 million a year which is an extortionate amount and we would therefore be willing to pay more for our drinks to reduce this burden.</p>		

Consultation Question 3:
How do you think the level of minimum unit price set by the Government should be adjusted over time? (Please select one option)

Do nothing – the minimum unit price should not be adjusted	<input type="checkbox"/>
The minimum unit price should be automatically updated in line with inflation each year	<input checked="" type="checkbox"/>
The minimum unit price should be reviewed after a set period	<input type="checkbox"/>
Don't know	<input type="checkbox"/>

Consultation Question 4:
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 <input checked="" type="checkbox"/>	No <input type="checkbox"/>	Don't know <input type="checkbox"/>
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If Yes please specify in the box below (keeping your views to a maximum of 100 words)

A 50p MUP would:

- delay the age young people start to drink and reduce consumption for young people who 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 and misuse,
- result in fewer victims of crime and anti-social behaviour,
- save local services time and money in dealing with excessive alcohol use and misuse,
- Put community pubs on a level footing with off-licenses and supermarkets.

(words: 84)

Consultation Question 5:
Do you think there should be a ban on multi-buy promotions involving alcohol in the off-trade? (Please select one option)

Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	Don't know <input type="checkbox"/>
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Consultation Question 6:
Are there any further offers which should be included in a ban on multi-buy promotions? (Please select one option)

Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	Don't know <input type="checkbox"/>
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If Yes please specify in the box below (keeping your views to a maximum of 100 words)

We would support an end to multi-buy promotions in both the off **and on** trade. Alcohol is an addictive drug and should be treat as such.

Any incentive to purchase or consume more than intended whether on or off license – such as money off or reductions to other products or services or voucher points, or buy two glasses get the rest of the bottle free, two measures for £1.50 – should be prohibited. This should include packaging alcohol as part of a “meal deal” or offering free alcohol on flights or as part of first-class rail travel.

(words: 95)

Consultation Question 7:

Should other factors or evidence be considered when considering a ban on multi-buy promotions?
(Please select one option)

Yes	<input checked="checked" type="checkbox"/>	No	<input type="checkbox"/>	Don't know	<input type="checkbox"/>
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If Yes please specify in the box below (keeping your views to a maximum of 200 words)

Consultation Question 8:

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	<input checked="checked" type="checkbox"/>	No	<input type="checkbox"/>	Don't know	<input type="checkbox"/>
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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.

Emergency Services - cheap deals encourage pre-loading which leads to problems in the night time economy.

(words: 79)

Consultation Question 9:

Do you think each of the mandatory licensing conditions is effective in promoting the licensing objectives (crime prevention / public safety / public nuisance / prevention of harm to children)?
Please state Yes/No/Don't know in each box

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

C	Mandatory provision of free tap water	Yes	Yes	Yes	Yes
D	Age verification policy	Yes	Yes	Yes	Yes
E	Mandatory provision of small measures	Yes	Yes	Yes	Yes

Consultation Question 10:
Do you think that the mandatory licensing conditions do enough to target irresponsible promotions in pubs and clubs?
(Please select one option)

Yes	No X	Don't know
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If no please state what more could be done in the box below (keeping your views to a maximum of 100 words)

Consultation Question 11:
Are there other issues related to the licensing objectives (prevention of crime and disorder / public safety / prevention of public nuisance / protection of children from harm) which could be tackled through a mandatory licensing condition?
(Please select one option)

Yes	No X	Don't know
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If Yes please specify in the box below (keeping your views to a maximum of 200 words)

Consultation Question 12:
Do you think the current approach, with five mandatory licensing conditions applying to the on-trade and only one of those to the off-trade, is appropriate? (Please select one option)

Yes	No X	Don't know
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If no please explain why you think the current approach is not the best approach in the box below (keeping your views to a maximum of 100 words)

Consultation Question 13:
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)

Consultation Question 14:
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 X	No	Don't know
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If yes please specify which aspects in the box below (keeping your views to a maximum of 200 words)

Consultation Question 15:
 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 in the box below, keeping your views to a maximum of 200 words. Please provide evidence to support your response.

Consultation Question 16:
 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 met key criteria for limited or incidental sales? (Please select one option in each row)

		Yes	No	Don't know
A	The provision should be limited to a specific list of certain types of business and the kinds of sales they make		X	
B	The provision should be available to all businesses providing they meet certain qualification criteria to be an ancillary seller		X	
C	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 options A and B		X	

Consultation Question 17:
 If special provision to reduce licensing burdens on ancillary sellers were to include a list of certain types of premises, do you think it should apply to the following? (Please select one option in each row)

		Yes	No	Don't know
A	Accommodation providers, providing alcohol alongside accommodation as part of the contract –		X	
B	Hair and beauty salons providing alcohol alongside a hair or beauty treatment		X	
C	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 options A and B		X	
D	Florists providing alcohol alongside the purchase of flowers		X	
E	Regular charitable events providing alcohol as part of the wider occasion		X	

Consultation Question 18:
 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 suggestion in the box below, keeping your views to a maximum of 200 words)

This is the element of the consultation which has caused our Partnership most concern. We feel strongly that there is no need for 'freeing up the burdens on businesses' to make it easier to sell alcohol. We already have enough outlets in our area for selling alcohol without the need to make it easier and for people/premises not to need licenses. How will we manage or have a say about the number of alcohol outlets in our area?

Our attitudes to alcohol need to change. These proposals will add to our cultural attitudes that

alcohol is central to our life. It sends out the wrong message to our children, who, incidentally may frequent the hairdressers with their parent.

(word: 116)

Consultation Question 19:

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 (see paragraphs 9.2 and 9.3). Do you think that the qualification criteria proposed in paragraph 9.6 meet this aim? (Please select one option)

Yes	No <input checked="" type="checkbox"/>	Don't know
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If no please describe the changes you would make in the box below (keeping your views to a maximum of 200 words)

No matter how we look at it alcohol is a drug and is addictive. Although it is legal we still need to ensure that there are adequate safeguards and controls over its sale. A sale of alcohol is a sale of alcohol no matter how big or small.

We believe that the introduction of ancillary sellers would have an adverse impact on our local community.

(words: 65)

Consultation Question 20:

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
A	Allow premises making ancillary sales to request in their premises licence application that the requirement for a personal licence holder be removed		<input checked="" type="checkbox"/>	
B	Introduce a new light touch form of authorisation for premises making ancillary sales – an 'ASN' but retain the need for a personal licence holder		<input checked="" type="checkbox"/>	
C	Introduce a new light touch form of authorisation for premises making ancillary sales – an 'ASN' but with no requirement for a personal licence holder		<input checked="" type="checkbox"/>	

Consultation Question 21:

Do you think that the following proposals would impact adversely on one or more of the licensing objectives? (Please select one option in each row)

		Yes	No	Don't know
A	Allow premises making ancillary sales to request in their premises licence application that the requirement for a personal licence holder be removed	<input checked="" type="checkbox"/>		
B	Introduce a new light touch form of authorisation for premises making ancillary sales – an 'ASN' but retain the need for a personal licence holder	<input checked="" type="checkbox"/>		
C	Introduce a new light touch form of authorisation for premises making ancillary sales – an 'ASN' but with no requirement for a personal licence holder	<input checked="" type="checkbox"/>		

Consultation Question 22:
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 views to a maximum of 200 words)

There needs to be accountability for selling an addictive drug. Who would be 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?

We have significant concerns that the legislation would provide loopholes for irresponsible businesses to abuse.

Removing the need to advertise restricts our communities' ability to know about and have a say on alcohol being sold in our local neighbourhood.

(words: 84)

Consultation Question 23:
Do you agree that licensing authorities should have the power to allow organisers of community events involving licensable activities to notify them through a locally determined notification process? (Please select one option)

Yes x	No	Don't know
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Consultation Question 24:
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
A	Reduce the burden		X	
B	Increase the burden	X		

Consultation Question 25:
Should the number of TENs which can be given in respect of individual premises be increased? (Please select one option)

Yes	No X	Don't know
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Consultation Question 26:
If yes, please select one option to indicate which you would prefer:

15	
18	
Don't know	

Consultation Question 27:
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
A	Determining that premises in certain areas are exempt			
B	Determining that certain areas are exempt in their local area			

<p>Consultation Question 28:</p> <p>Do you agree that motorway service areas should receive a nationally prescribed exemption from regulations for the provision of late night refreshment?</p> <p>(Please select one option)</p>				
		Yes	No	Don't know
A	Motorway services should receive a nationally prescribed exemption from regulations for the provision of late night refreshment		X	

<p>Consultation Question 29:</p> <p>Please describe any other types of premises to which you think a nationally prescribed exemption should apply (keeping your views to a maximum of 100 words)</p>				

<p>Consultation Question 30:</p> <p>Do you agree with each of the following proposals? (Please select one option in each row)</p>				
		Yes	No	Don't know
A	Remove the requirements to advertise licensing applications in local newspapers		X	
B	Remove the centrally imposed prohibition on the sale of alcohol at MSA's for the on and off trade		X	
C	Remove the centrally imposed prohibition on the sale of alcohol at MSA's but only in respect of overnight accommodation – "lodges"	X		
D	Remove or simplify requirements to renew personal licences under the 2003 Act		X	

<p>Consultation Question 31:</p> <p>Do you think that each of the following would reduce the overall burdens on business? (Please select one option in each row)</p>				
		Yes	No	Don't know
A	Remove the requirements to advertise licensing applications in local newspapers	X		
B	Remove the centrally imposed prohibition on the sale of alcohol at MSA's for the on and off trade	X		
C	Remove the centrally imposed prohibition on the sale of alcohol at MSA's but only in respect of overnight accommodation – "lodges"		X	
D	Remove or simplify requirements to renew personal licences under the 2003 Act	X		

<p>Consultation Question 32:</p> <p>Do you think that the following measures would impact adversely on one or more of the licensing objectives? (Please select one option in each row)</p>				
		Yes	No	Don't know
A	Remove the requirements to advertise licensing applications in local newspapers	X		
B	Remove the centrally imposed prohibition on the sale of alcohol at MSA's for the on and off trade	X		
C	Remove the centrally imposed prohibition on the sale of alcohol at MSA's but only in respect of overnight accommodation – "lodges"	X		

D	Remove or simplify requirements to renew personal licences under the 2003 Act	X		
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Consultation Question 33:
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 specify in the box below keeping your views to a maximum of 200 words)

Consultation Question 34: 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
A	Minimum unit pricing	X		
B	Multi-buy promotions		X	
C	Health as an objective for cumulative impact			
D	Ancillary sales of alcohol	X		
E	Temporary Event Notices	X		
F	Late night refreshment	X		
G	Removing the duty to advertise licensing applications in local newspapers		X	
H	Sales of alcohol at motorway service stations		X	
I	Personal licences		X	

Consultation Question 35:
Do you have any comments on the methodologies or assumptions used in the impact assessments? If so please detail them, referencing clearly the impact assessment and page to which you refer.

Yes	No X	Don't know
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If yes please specify in the box below, referencing clearly the impact assessment and page to which you refer (keeping your views to a maximum of 400 words).