

Consultation

5.8 The Government wants to ensure that the chosen minimum unit price level (45p per unit) is targeted and proportionate, whilst achieving a significant reduction of harm.

Consultation Question 1:

Do you agree that this Minimum Alcohol Price (MUP) level would achieve these aims? (Please select one option):

Yes

No

☒

Don't Know

m

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).

We do not believe the current proposals will have the desired impact on the drinks of choice of the most vulnerable, which is the high alcohol content beers, ciders and lager. A better approach may be to "restrict" the sale of the most harmful drinks (for example special brew, white lightning cider) in areas where street drinking is seen as a problem. The new Public Health services could play a significant role in identifying areas where street drinking is causing significant harm.

Consultation Question 2:

Should other factors or evidence be considered when setting a minimum unit price for alcohol? (Please select one option):

Yes

☒

No

Don't Know

If yes, then please specify these in the box below (keeping your views to a maximum of 200 words).

It would help to protect the most vulnerable from alcohol abuse by targeting the sale of the most harmful drinks (i.e. those with high alcohol content, for example special brew, white lightning cider)

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.
- The minimum unit price should be automatically updated in line with inflation each year.
- The minimum unit price should be reviewed after a set period.
- Don't know.

☒

We do not necessarily consider MUP to be the most effective response, therefore cannot comment on whether it should be adjusted over time.

Consultation Question 4:

The aim of minimum unit pricing is to reduce the consumption of harmful and hazardous drinkers, while minimising the impact on responsible¹⁵ 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

No

Don't Know

If Yes please specify in the box below (keeping your views to a maximum of 100 words).

Responsible drinkers could be affected

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

No

☒

Don't Know

Consultation Question 6:

Are there any further offers which should be included in a ban on multi-buy promotions?

(Please select one option):

Yes

☒

No

Don't Know

If yes, please specify in the box below (keeping your views to a maximum of 100 words).

The restrictions should apply to multi-buy offers on the most harmful drinks (high strength drinks as described in Q2) only

Consultation Question 7:

Should other factors or evidence be considered when considering a ban on multi-buy promotions?

(Please select one option):

Yes

☒

No

Don't Know

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

It should be considered as to whether the ban would have a negative impact on responsible drinkers

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

☒

No

Don't Know

If yes please specify in the box below (keeping your views to a maximum of 100 words).

Responsible drinkers could be affected

Consultation Question 9:

The five mandatory licensing conditions currently set out in regulations in relation to the supply of alcohol are:

i. A ban on irresponsible promotions.¹⁷

- ii. A ban on dispensing alcohol by one person directly into the mouth of another.
- iii. A requirement to provide free tap water on request to customers.
- iv. A requirement to have an age verification policy to prevent the sale of alcohol to persons under 18 years of age.¹⁸
- v. A requirement to make available to customers small measures such as half pints of beer or cider or 125ml glasses of wine.¹⁹

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 - see glossary)?

Please state Yes / No / Don't know in each box:

	Prevention of crime and disorder	Public safety	Prevention of public nuisance	Protection of harm from children
A. Irresponsible promotions (see condition i above)	Yes	Yes	Yes	Yes
B. Dispensing alcohol directly into the mouth (see condition ii above)	Yes	Yes	Yes	Yes
C. Mandatory provision of free tap water (see condition iii above)	Yes	Yes	Yes	Yes
D. Age verification policy (see condition iv above)	Yes	Yes	Yes	Yes
E. Mandatory provision of small measures (see condition v above)	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

Don't Know

☒

If no, please state what more could be done in the box below (keeping your views to a maximum of 100 words).

The issue of irresponsible promotions is not a particular problem within the London Borough of Redbridge

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 - see glossary) which could be tackled through a mandatory licensing condition? (Please select one option):

Yes

No

☒

Don't Know

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

The Act intended for licences to have conditions added according to the specific needs of each premises and so we do not feel that any further standard / mandatory conditions are needed.

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 ☐ Don't Know ☐

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.

Health is an important consideration in relation to alcohol. London Ambulance data and A&E data would be very helpful in determining the need to introduce CIP's

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 ☒ No ☐ Don't Know ☐

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

Our view is that the CIP process would need to be amended. Our preference would be to put CIP's on a proper statutory footing rather than through the Home Office Guidance and for the Public Health Service to be a key part of the process by supplying London Ambulance data and A&E data.

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.

A big impact. Studies show that the A & E departments of hospitals at the weekend are full of injuries that are alcohol related. The results of chronic drinking are a significant burden on the NHS that could be reduced with more controls.

9.5 The first option (see Question 16 A) is to define ancillary sellers by reference to specific types of businesses and the kinds of sales they make, such as those examples of guesthouses or hairdressers given above in paragraph 9.2. Some specific types of businesses on which we are seeking views on including can be found in Question 17, with further suggestions invited in Question 18. This proposal would have the effect of excluding other types of businesses where sales of alcohol might still be incidental to the main business, but the risk of creating loopholes might be seen by some as higher.

9.6 The second option (see Question 16 B) is to broaden the definition of “ancillary sales” to include all businesses (and/or not for profit activities²²) 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.

These qualification criteria have the potential to significantly widen the types of businesses included. For example, this could include the kinds of sales that could be made where there are regular events in businesses such a book shop where an alcoholic drink is included as part of entry to a book signing event, or at a tourist attraction, such as a tour of a vineyard or distillery, where a glass of wine or whisky is included in the ticket price.

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 meet certain qualification 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 (see paragraph 9.5).		<input checked="" type="checkbox"/>	
B The provision should be available to all businesses providing they meet certain qualification criteria to be an ancillary seller (see paragraph 9.6).		<input checked="" type="checkbox"/>	
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.	<input checked="" type="checkbox"/>		

Consultation Question 17:

If special provision 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
--	-----	----	------------

A Accommodation providers, providing alcohol alongside accommodation as part of the contract.		<input checked="" type="checkbox"/>	
B Hair and beauty salons, providing alcohol alongside a hair or beauty treatment.		<input checked="" type="checkbox"/>	
C Florists, providing alcohol alongside the purchase of flowers.		<input checked="" type="checkbox"/>	
D Cultural organisations, such as theatres, cinemas and museums, providing alcohol alongside cultural events as part of the entry ticket.	<input checked="" type="checkbox"/>		
E Regular charitable events, providing alcohol as part of the wider occasion.	<input checked="" type="checkbox"/>		

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 (see glossary)? (Please write your suggestions in the box below, keeping your views to a maximum of 200 words):

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 Don't Know

If no, please describe the changes you would make in the box below (keeping your views to a maximum of 200 words).

Option A - Removing the need for a personal licence holder

Option B - Removing the need for a premises licence

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			<input checked="" type="checkbox"/>

removed.			
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 - with no requirement for a personal licence holder.			<input checked="" type="checkbox"/>

It may reduce a small burden from the ancillary sellers but that should not be the overriding reason to remove the requirement for a Premises Licence Holder.

Consultation Question 21:

Do you think that the following proposals 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
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 – 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)?

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

No

☒

Don't know

The lack of a consistent approach has the potential to cause problems for neighbouring Boroughs including confusion / concern regarding unfairness by members of the public.

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			<input checked="" type="checkbox"/>
B Increase the burden			<input checked="" type="checkbox"/>

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

☒

Don't know

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.	<input checked="" type="checkbox"/>		
B Determining that certain premises types are exempt in their local area.	<input checked="" type="checkbox"/>		

Consultation Question 28:

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	No	Don't know
A Motorway service areas should receive a nationally prescribed exemption from regulations for the provision of late night refreshment.			<input checked="" type="checkbox"/>

Not an issue for the London Borough of Redbridge as we don't have any MSAs.

Consultation Question 29:

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):

Consultation Question 30:

Do you agree with each of the following proposals? (Please select one option in each row):

	Yes	No	Don't know
A Remove requirements to advertise licensing applications in local newspapers.		<input checked="" type="checkbox"/>	
B Remove the centrally imposed prohibition on the sale of alcohol at MSAs for the on and off-trade.		<input checked="" type="checkbox"/>	
C Remove the centrally imposed prohibition on the sale of alcohol at MSAs but only in respect of overnight accommodation – “lodges”.			<input checked="" type="checkbox"/>
D Remove or simplify requirements to renew personal licences under the 2003 Act.		<input checked="" type="checkbox"/>	

Consultation Question 31:

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
A Remove requirements to advertise licensing applications in local newspapers.		<input checked="" type="checkbox"/>	
B Remove the centrally imposed prohibition on the sale of alcohol at MSAs for the on and off-trade.		<input checked="" type="checkbox"/>	
C Remove the centrally imposed prohibition on the sale of alcohol at MSAs but only in respect of overnight accommodation – “lodges”.			<input checked="" type="checkbox"/>
D Remove or simplify requirements to renew personal licences under the 2003 Act.		<input checked="" type="checkbox"/>	

Consultation Question 32:

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
A Remove requirements to advertise licensing applications in local newspapers.	<input checked="" type="checkbox"/>		
B Remove the centrally imposed prohibition on the sale of alcohol at MSAs for the on and off-trade.	<input checked="" type="checkbox"/>		
C Remove the centrally imposed prohibition on the sale of alcohol at MSAs but only in respect of overnight accommodation – “lodges”.			<input checked="" type="checkbox"/>
D Remove or simplify requirements to renew personal licences under the 2003 Act.	<input checked="" type="checkbox"/>		

--	--	--	--

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):