

Q1 - 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

A = don't know

Additional text - **The theory tends to support the premise that increasing the unit price of alcohol will reduce sales, however it is not clear that this will universally be the case amongst the target cohort of harmful or hazardous drinkers. The Canadian study quoted in your research also states that "the impact can be blunted if drinkers are able to choose cheaper, lower quality products to compensate" (which could result in more or further harm), and does not take into account the possible impact of black market economies to fill the gap. Also this was on the basis of a natural experiment and the increase in pricing appears to have been incremental over a period of some 20 years.**

Q2 - Should other factors or evidence be considered when setting a minimum unit price for alcohol?

A = Yes

Additional Text: **Is the increase proportionate to inflation? How will any pricing increases affect the wider population in light of pay freezes and other cuts taking place? How much will any reduced sales impact on the public purse in terms of taxation? Or in reality will it be offset by the increase in minimum unit price. Some transparency around this would be appreciated.**

Q3 - 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.

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

Q4 - 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

A = Don't know

Additional Text - **What is meant by a responsible drinker? Does your definition of harmful / hazardous drinkers include binge drinkers? Note there is some ambiguity regarding definition of binge drinking and its impact in this context (see Hering et al. (2008), 'Binge drinking today: Learning Lessons from the past', Drugs: education, prevention and policy 15(5), (pp. 475-486)). How will this address the impact of binge drinking on the high street specifically and the associated "harms"?**

Q5 - Do you think there should be a ban on multi-buy promotions involving alcohol in the off-trade?

Please select one option.

A = Yes

Q6 - Are there any further offers which should be included in a ban on multi-buy promotions?

Please select one option

A = Yes

Additional Text - Not sure that the proposals go far enough to have any impact. What is the real difference between a buy one get one free offer (banned), and half price promotions (NOT BANNED)? This equates to effectively the same thing, in that two can be bought for the price of one if the WANT is sufficient. If there are going to be multi-ban buys then they should also include 1/2 price offers and other offers that would encourage baulk purchasing of alcohol.

Q7 - Should other factors or evidence be taken into account when considering a ban on multi-buy promotions?

A = Yes

Additional text: Who exactly is the target audience? How exactly will off premises be required to advertise limitations on purchasing, and how will this reach the target audience specifically? So how will this be communicated and advertised in a way to educate consumers about alcohol consumption and responsible drinking? What about the effect on “responsible” drinkers who baulk purchase alcohol to save money in the long run; not with the intention of binge, hazardous or harmful drinking?

Q8 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?

A = Don't know

Q9 - Do you think each of the mandatory licensing conditions is effective in promoting the licensing objectives?

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 ▾ | No ▾ |
| Dispensing alcohol directly into the mouth | Yes ▾ | Yes ▾ | Yes ▾ | No ▾ |
| Mandatory provision of free tap water | Yes ▾ | Yes ▾ | Yes ▾ | No ▾ |
| Age verification policy | Yes ▾ | Yes ▾ | Don't know ▾ | Yes ▾ |
| Mandatory provision of small measures | Yes ▾ | Yes ▾ | Yes ▾ | No ▾ |

Note: why ask questions about protection of children from harm – most not applicable because children shouldn't be in a pub or club drinking! Unclear if age verification policy has any influence on prevention of public nuisance.

Q10 – Do you think that mandatory licensing conditions do enough to target irresponsible promotions in pubs and clubs?

Please select one option

A = Yes (in so much as they can)

Q11 – Are there any 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?

A = Yes

Additional Text: Regulations regarding use of polycarbonate or plastic drink receptacles (or equivalent) – not glass. Local A&E data tells us that glass related assaults are twice as prevalent in admissions linked to night-time economy hours; at the weekend in the early hours. Replacement of glass with plastic (or alternative) could reduce the impact of this type of trauma.

Q12 – 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?

A = No

Additional Text - **The five mandatory licensing conditions does not appear to stipulate a requirement for retailers (on and off sales) to refuse sales to clearly intoxicated individuals, should this also not be a mandatory licensing condition?**

Q13 - 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?

The challenge will be in assessing the association between premise density and alcohol and health related harms; attributable fractions would not be suitable for this. According to Lugo, W. (2008), 'Alcohol and Crime: Beyond Density', the question of density has not been rigorously tested. He found that what affects crime the most is not how many 'liquor' licenses there are, but what kinds. This is supported by local research. The key will be in collating evidence required to meet the rebuttable presumption on a case by case basis. A&E departments might collate data concerning the patient's last drink, or where they have been drinking in terms of locality or specific premises. A&E staff might also provide useful evidence of the harm associated with binge, harmful and hazardous drinking, as might ambulance staff, and data provided by the ambulance service who attend to fights, and intoxicated individuals in need of treatment. On a general level, how to measure the impact of binge drinking in health terms, and how this is associated with town centre's in a CIP context would be quite a challenge.

Q14 – 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?

A = No

Q15 – 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?

As stated in a previous response, it has been found in this borough for example that glass related injuries are twice as prevalent during the NTE hours than at all other times. This provides additional evidence and information regarding alcohol related harm. If this can then be drilled down to specific locales, areas, premises and within certain contexts, it could provide a much more comprehensive picture of the extent of alcohol related harm in areas with already high numbers of risky premises (such as bars, pubs and clubs), especially if the evidence points to those pubs and clubs as being in part responsible for the violence with respect to their policy on glass. This will also compliment other evidence such as police crime and ASB data and environmental impact assessments.

Q16 – 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 provided they meet certain qualification criteria for limited or incidental sales?

| | 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 | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> |
| The provision should be available to all businesses providing they meet certain qualification criteria to be an ancillary seller | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> |
| 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 | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> |

Q17 – 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 |
|--|-----------------------|----------------------------------|-----------------------|
| Accommodation providers, providing alcohol alongside accommodation as part of the contract | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> |
| Hair and beauty salons, providing alcohol alongside a hair or beauty treatment | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> |
| Florists, providing alcohol alongside the purchase of flowers | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> |
| Cultural organisations, such as theatres, cinemas and museums, providing alcohol alongside cultural events as part of the entry ticket | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> |
| Regular charitable events, providing alcohol as part of the wider occasion | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> |

Q18 – Do you have any suggestions for other types of businesses to which special provision could apply without impacting adversely on one of more of the licensing objectives?

A = No

Q19 - 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?

A = No

Additional text: Concerns about how these ancillary licenses would be regulated, and enforced. What would the sanctions be for breach of conditions? How would this be legislated? What is a “prescribed” amount of alcohol, and how would decisions be made about (e.g.) private members clubs where drinking might not be advertised as the main activity, yet associated behaviours impact on the licensing objectives, even if “drinking” is not overtly considered by the business to be the main activity? Public perception of this type of licence might also be an issue, especially if it is considered to be a loophole around licensing or providing a system that is open to “interpretation” or misuse.

Q20 - The government is consulting on two basic approaches which could be used to reduce the burden on premises where they have been given the status of an ancillary seller.

- Option A - removing the need for a personal licence holder
- Option B - removing the need for a premises licence

Do you think that these proposals would significantly reduce the burdens on ancillary sellers?

| | 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 | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> |
| Introduce a new, light-touch form of authorisation for premises making ancillary sales - an ASN but retaining the need for a personal licence holder | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> |
| Introduce a new, light touch form of authorisation for premises making ancillary sales - an ASN - with no requirement for a personal licence holder | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> |

Q21 - 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 | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Introduce a new, light-touch form of authorisation for premises making ancillary sales - an ASN but retaining the need for a personal licence holder | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| 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="radio"/> | <input type="radio"/> | <input type="radio"/> |

Q22 – What other issues or options do you think should be considered when taking forward proposals for a lighter touch authorisation?

None – think it is a bad idea.

Q23 - 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?

A = Yes

Q24 – What impact do you think a locally determined notification would have on organisers of community events?

| | Yes | No | Don't know |
|---------------------|-----------------------|-----------------------|----------------------------------|
| Reduce the burden | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> |
| Increase the burden | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> |

Q25 – Should the number of TENS which can be given in respect of individual premises be increased?

A = No

Q26 – If yes, please select one option to indicate which you would prefer.

N/A

Q27 – 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 | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Determining that certain premises types are exempt in their local area | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> |

Q28 – Do you agree that motorway service areas should receive a nationally prescribed exemption from regulations for the provision of late night refreshment?

A = Don't know

Q29 – Please describe in the box below any other types of premises to which you think a nationally prescribed exemption should apply?

Blank

Q30 – Do you agree with the following proposals?

Please select one option in each row.

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

No to the advertising one (top) on the basis of the fact that they state the burden is on the applicant, and they don't propose an alternative, they just want to get rid of having to advertise altogether.

Q31 – Do you think that each of the following would reduce the overall burdens on businesses?

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

Q32 – Do you think that the following measures would adversely impact on one or more of the licensing objectives?

Please select one option in each row.

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

Yes to advertising – how else would this be raised with local communities who might want to raise objections?

Q33 – 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?

Blank