

Consultation Response – Stockton-On-Tees, Local Strategic Partnership

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

Whilst agreeing that minimum unit pricing is a highly targeted and effective approach that would have the greatest impact on younger and heavier drinkers, Stockton would urge the Government to set a MUP for alcohol of at least 50p for the following reasons:

- The University of Sheffield has modelled the effects of MUP on a number of parameters (1). A MUP of 50p compared to a MUP of 45p would save annually an additional 1,000 deaths; 31,000 alcohol-related hospital admissions; 18,000 crimes and would reduce consumption by a further 2.4%
- The previous Chief Medical Officer called for a 50p MUP of alcohol in 2009 which at today's value would be in excess of 50p (2)
- The Faculty of Public Health supported the call for a MUP of 50p for alcohol in their "12 Steps to Better Health Manifesto" (3) with 50p MUP being 'Step No. 1'
- The Association of North East Council's Leaders' and Elected Mayors' Group support MUP set at 50p
- Consideration needs to be given to cross-border purchases if a MUP below that proposed for Scotland (50p) is set, particularly in border areas in the North of England
- We believe that a MUP, particularly set at 50p, provides clarity and would be easier to enforce than alternative levels of MUP and different ways of raising price.

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="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)

Factors

- MUP should be set at no less than 50p per unit, and regularly reviewed to ensure alcohol does not become more affordable over time
- Consider cross-border purchases if a MUP below that proposed for Scotland (50p) is set
- Increased monies received by retailers need to be utilised to reduce problems caused by alcohol.
- The introductory period for MUP provision should be in line with that agreed in Scotland and independent evaluations on effectiveness set up.

Evidence:

- MUP would close the price difference between pubs and cheapest supermarket deals. Community pubs contributed £19 billion and 900,000 jobs to the economy . That contribution is being eroded by cheap off-licence sales alcohol
- 47% of people surveyed in Stockton support MUP
- 65% of people in the Stockton stated they were more likely to support MUP if it reduced drunk and rowdy behaviour – which evidence suggests it would (1)
- The BMA support 50p MUP (8) and 80% of GPs in the NE support MUP (9)
- Evidence from Sheffield University indicates that a minimum unit price set at 50p would result in larger reductions in alcohol consumption amongst this young people
- Alcohol harm is costing Stockton £71.13 million a year
- 40% of child protection cases and 74% of child mistreatment cases in the UK are alcohol related (12).

<p>Consultation Question 3:</p> <p>How do you think the level of minimum unit price set by the Government should be adjusted over time? (Please select one option)</p>	
Do nothing – the minimum unit price should not be adjusted	<input type="checkbox"/>
The minimum unit price should be automatically be 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"/>

<p>Consultation Question 4:</p> <p>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)</p>		
Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	Don't know <input type="checkbox"/>
<p>If Yes please specify in the box below (keeping your views to a maximum of 100 words)</p> <p>It would:</p> <ul style="list-style-type: none"> • Help children through: <ul style="list-style-type: none"> ○ Fewer drinking – ○ Reduced risks of excessive consumption shaping behaviour ○ Protect children in the family context – alcohol has been identified as a factor in 40% of child protection cases (12) • Help protect current and future victims of domestic abuse, around 40% of which are linked to alcohol (13) • Result in fewer crimes (1), victims of crime and reduced fear of crime • Benefit frontline workers – i.e. reduced assaults and time and money saved • Benefit drinkers and non - drinkers as dealing with alcohol harm in Stockton costing £71.13million a year (11) • Benefit community pubs and bars. 		

<p>Consultation Question 5:</p> <p>Do you think there should be a ban on multi-buy promotions involving alcohol in the off-trade? (Please select one option)</p>		
Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	Don't know <input type="checkbox"/>

<p>Consultation Question 6:</p> <p>Are there any further offers which should be included in a ban on multi-buy promotions? (Please select one option)</p>			
Yes	<input checked="" type="checkbox"/>	No	Don't know
<p>If Yes please specify in the box below (keeping your views to a maximum of 100 words)</p> <p>Stockton would support an end to multi-buy promotions in the off and on trade as alcohol is addictive and should not be treated like just another product. Any incentive to purchase and consume more than intended such as money off or reductions to other products 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.</p> <p>For the same reasons we believe that all promotions – including those offering money off individual items – should be stopped. Alcohol is not an ordinary product and should not be treated as such.</p>			

<p>Consultation Question 7:</p> <p>Should other factors or evidence be considered when considering a ban on multi-buy promotions? (Please select one option)</p>			
Yes	<input checked="" type="checkbox"/>	No	Don't know
<p>If Yes please specify in the box below (keeping your views to a maximum of 200 words)</p> <ul style="list-style-type: none"> • A ban on multi-buy promotions would increase the effectiveness of MUP. For example, a MUP of 50p plus an off trade discount ban would lead to further falls in consumption resulting in more lives saved, greater falls in hospital admissions, a larger fall in alcohol related crimes and bigger falls in absence days and unemployment (14) • Prof. Nutt suggested that alcohol is the most dangerous drug in the UK beating heroin and crack cocaine. Yet alcohol, in contrast to those illegal drugs, is as easy to access as regular grocery items. Worse than that, it has been used as a loss leader by supermarkets. • Cheap alcohol deals may result in young people drinking more • A joined up policy approach which addresses the price and availability of alcohol as well as the quality and co-ordination of hospital and community services, is both coherent and evidence-based. It will deliver the health outcomes and reductions in alcohol related mortality (1) • Reductions in consumption levels would improve health inequalities as health harms have a greater impact on lower income groups, alcohol related deaths are 45% higher in areas of high deprivation (18). 			

<p>Consultation Question 8:</p> <p>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)</p>			
Yes	<input checked="" type="checkbox"/>	No	Don't know
<p>If Yes please specify in the box below (keeping your views to a maximum of 100 words)</p> <p>Young people in particular would benefit from a ban on cheap alcohol deals as outlined above.</p> <p>People on low incomes, in the most deprived areas men are five times, and women three times, more likely to die an alcohol related death than those in the least deprived areas (18).</p>			

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

Our front line services would benefit as multi-purchase deals encourage pre-loading which, in turn, leads to more problems in the night time economy.

Families would benefit as these deals encourage home drinking where excessive consumption is hidden and harder to control.

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	Yes	Yes	Yes	Yes
B	Dispensing alcohol directly into the mouth	Yes	Yes	Yes	Yes
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)

Conditions to be amended-

- irresponsible promotions should remove the clause stating need to 'demonstrate a link with crime and disorder'

- Age verification policies should stipulate the need for a written policy which is advertised within the venue.

Furthermore, anything which encourages greater consumption than intended should not be allowed, including:

- Price-based promotions
- student promotions, pub crawls, large container for consumption e.g. 'goldfish bowls', mobile sales
- offering an alcoholic drink cheaper than an one without alcohol
- spirits in on trade premises, seen in some VIP areas of clubs.

Withdrawal of the 35ml spirit measure, leaving the 25ml single measure.

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

- Age verification training
- The need to keep a refusals book
- Till prompts re age verification (i.e. Challenge 25)
- Mandatory training to sell alcohol
- Provision and promotion of lower strengths beers and wines
- Promotion - not simply provision - of small measures; active promotion of soft drinks
- Upselling should be prohibited
- Point of sale information should be made compulsory stipulating units of alcohol and the recommended limits together with health harms.

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

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)

The problems of alcohol harm are increasingly associated with cheap alcohol sold from off licence premises, yet only one condition applies to the off trade. Pre-loading, people who have pre-loaded before they go out into the night-time economy are more likely to be a victim or perpetrator of crime. (20)

Dependant drinkers are more likely to consume alcohol purchased from the off trade.

Irresponsible promotions and the provision and promotion of smaller measures could both be applied to the off trade together with the practices highlighted in our answer to question 10.

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)

There are a range of sources available, including:

- A&E data
- Ambulance data
- Alcohol specific hospital admissions
- Alcohol attributable hospital admissions
- Under 18 admissions
- Liver and other alcohol related deaths
- Domestic abuse and child protection data
- Alcohol related crime figures
- Local data sources, e.g. residents' surveys.
- Numbers in treatment

Stockton do not have a CIP however we believe that public health should be a licensing objective in its own right and not tied to CIPs. As CIPs focus upon night time economy rather than excessive access too and consumption of alcohol. Public health data could be used to underpin over-provision policies covering entire local authority areas to ensure the overall availability of alcohol is taken into account We do not accept the rationale on p7 of the relevant impact assessment stating that it would be disproportionate because the alcohol industry is already taking action as part of the Responsibility Deal. Promises on alcohol labelling have been made before – and been broken.

Furthermore, public health should be a consideration at the highest level in local authorities, playing a central

role in planning and economic development.

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)

There is a concern that although the stats from a PCT wide perspective may look compelling, once reduced to neighbourhood / ward size the figure may be small and too easily dismissed.

It may be more practical for a public health objective to be linked to borough-wide saturation policies as this is the level at which data becomes meaningful. Furthermore, it gives local politicians the opportunity to take control of the availability of alcohol in their council areas, helping to fulfil their new responsibility for public health.

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.

Introducing a public health objective, particularly to support over-provision or saturation policies at the borough-wide level, would enable licensing decisions to be made taking into account the full impact of alcohol harm within that council's boundaries. It would enable Stockton local authority to control the availability of alcohol in their area.

Fewer premises within a particular area would reduce the need for competitive pricing. It would limit the availability of alcohol at a local level to young people and those drinking at dependant levels. It would evidence the hidden harm of alcohol consumption in terms of home drinking. Finally, through sources such as A&E (Cardiff model) data, it would help to record the level of alcohol-related assaults reporting to A&E, many of which are not reported to and recorded by the police.

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)

An increased density of alcohol outlets is associated with increased levels of alcohol consumption among young people, increased levels of assault, and other harm such as homicide, child abuse and neglect, self-inflicted injury.

We profoundly disagree with the need for 'freeing up the burdens on businesses' to make it easier to sell alcohol. It will increase the availability of alcohol and further cement our pro-alcohol culture. It will lead to increased personal and social harm. It will worsen health inequalities. It will say to our children that alcohol has to be a central part of adult life. Furthermore, the 'ancillary license' provisions directly contradict the direction of travel set out in the Police Reform and Social Responsibility Act which, through measures such as the Night Time Levy and Early Morning Restriction Orders sets out to give localities greater power to restrict the availability of alcohol in their own neighbourhoods.

It will increase the costs and stresses on our public services.

There are significant dangers of loopholes should such changes be introduced. For example, would a taxi-firm running a dial-a-drink service qualify for an ancillary license? Would we see even more petrol stations selling alcohol?

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 X	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)

Stockton would request clarity on the legal definition of 'small part of, or incidental to'?

This provision represents a real risk that alcohol becomes even more normalised, thus failing to take into account the negative impact it has on society in terms of health harms, crime and disorder and wider societal and economic issues.

There is serious concern with regards to whom and how premises would be investigated to ensure that they are still eligible to be classed as an ancillary seller. At times of austerity and job cuts, why should a reduction in bureaucracy for businesses have to result in an increased workload and therefore increased cost for local authorities?

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	X		
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		X	
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		X	

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	X		
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	X		
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	X		

<p>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)</p> <p>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?</p> <p>Community premises are generally non-profit making whilst the proposed ancillary sellers are businesses. At a time when businesses are under pressure, there would be a temptation to make alcohol a more important part of their offer to customers.</p> <p>There is concern that the legislation would provide loopholes for irresponsible businesses to abuse.</p> <p>Removing the need to advertise contradicts the government's consultation: Rebalancing the Licensing Act - a consultation on empowering individuals, families and local communities to shape and determine local licensing which resulted in the vicinity test being removed to encourage communities to participate in licensing at a local level.</p> <p>The proposal to withdraw the annual fee for ancillary sellers is also a concern to local authorities as licensing even with the licensing fees is not cost neutral. Again, the previous consultation introduced the ability to set fees to cover costs, yet with this proposal, a significant number of premises would be exempt.</p>
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<p>Consultation Question 23:</p> <p>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)</p>		
Yes	No X	Don't know

<p>Consultation Question 24:</p> <p>What impact do you think a locally determined notification would have on organisers of community events? (Please select one option in each row)</p>				
		Yes	No	Don't know
A	Reduce the burden	X		
B	Increase the burden		X	

<p>Consultation Question 25:</p> <p>Should the number of TENs which can be given in respect of individual premises be increased? (Please select one option)</p>		
Yes	No X	Don't know

<p>Consultation Question 26:</p> <p>If yes, please select one option to indicate which you would prefer:</p>	
15	
18	
Don't know	

<p>Consultation Question 27:</p> <p>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)</p>				
		Yes	No	Don't know
A	Determining that premises in certain areas are exempt		X	
B	Determining that certain areas are exempt in their local area		X	

<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? (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>None – the World Health Organisation states that one of the key ways to reduce alcohol harm is to control the availability of alcohol (21). Alcohol is more available than ever before. It is available 24 hours a day, seven days a week and dial a drink services mean it can even be delivered to your door. Such services take advantage of those vulnerable individuals who have become dependant upon alcohol. The suggestions laid</p>				

out here risk compounding the errors made in trying to create a so called 'café/24 hour drinking culture'.

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 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	

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 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	

Consultation Question 32: 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)				
		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		

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)	
31 & 32 A - limits the ability to engage local communities, an ambition set out in 'Rebalancing the Licensing Act.	

31 & 32 B & C – send a negative mixed message about drinking and driving, increases availability, and underlines a pro-alcohol culture.

31 & 32 D – the need for a personal license underlines the seriousness of selling alcohol and makes an individual directly responsible for the safe and responsible sale of alcohol. It should not be removed.

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		X	
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 X No Don't know

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).

Impact Assessment: A minimum Unit Price for Alcohol

Ref: p5: Stockton believe the estimates are likely to under represent the costs associated with alcohol harm. A report from the National Social Marketing Centre which included wider social harm puts the economic cost at £55 billion.

Ref p10: Stockton are concerned that new methodology has been applied to work out the benefits delivered by a MUP at 45p. While we accept that the methodology should be updated to take account of inflation, no comparison has been provided for a MUP set at alternative levels such as 50p.

There is also no rationale as to why the figure of 45p has been chosen we would expect the evidence supporting that decision to be set out clearly.

Impact Assessment: Health as an objective for cumulative impact

Ref p7: In principle public health as an objective should be ranked alongside the other four licensing objectives and not tied to CIPs. The only argument for such a link is the practical one of being able to use meaningful public health data. We do not accept the rationale for the link made in the impact assessment. It is not disproportionate for the industry to promote sensible drinking and low and non-alcoholic drinks. In fact they should be forced to do so as their current corporate social responsibility programmes in this area are not working. Awareness that there is a maximum recommended limit has fallen from 82% to 69% over the same period, with less than half of those interviewed being able to name the limits.

Impact Assessment: Ancillary sellers

Ref p 1, 2, 3: We are concerned that the potential benefits to business are insufficient to run the risk of increased alcohol-related health harms.

Ref p6: We are concerned that the section on “Minimal” sales is highly ambiguous and provides no reassurance that loopholes would not be created. Local decisions by licensing authorities are likely to be subject to legal challenge.

Ref p8: The document estimates that up to 9,116 new alcohol sales venues could be created after three years, a significant increase in the availability of alcohol. This figure is partly based on the take up of licenses by ‘community premises’. While the figure has been increased from 4% to 6%, we believe that increase may be insufficient given the profit motive behind businesses which is not so present for community premises.