

ACPOC response to the “Consultation on delivering the UK Governments policy to cut alcohol fuelled crime and antisocial behaviour”

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Prepared by	

Summary of Consultation document and draft response to questions

Background

The UK Government Alcohol Strategy was published in March 2012 and sets out a range of measures to tackle the harms associated excessive alcohol consumption.

This consultation builds upon the proposals originating in that strategy. The full Consultation can be found within the Home Office Web site below:

<http://www.homeoffice.gov.uk/publications/about-us/consultations/alcohol-consultation/>

The survey broadly falls under the following areas:

- A ban on multi-buy promotions in shops and off licenses (not pubs and clubs)
- A review of the mandatory licensing conditions (irresponsible drinks promotions, Age verification policy)
- Health as grounds for objecting to new licensing applications, so that alcohol related harms can be considered when managing the number of premises in a given area.
- Reducing Bureaucracy for responsible businesses
- Minimum Unit Pricing (set at 45p)

Key outcomes

It is anticipated that there will be a marked reduction in alcohol related Crime and anti social behaviour, with over 44% of violent crime being linked to drunkenness and general intoxication. The imperative to reduce the problem of excessive and hazardous alcohol consumption is clear.

The Welsh Association of Chief Police Officers has considered the proposals and submits the following formal response:

Consultation Question 1:

Do you agree that this MUP level would achieve these aims?

Yes	No X	Don't Know
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ACPO Cymru would fully support any effort to reduce the excessive consumption of alcohol by individuals and note the importance of targeting 'off sales' of the cheapest and strongest drinks. The proposal also supports efforts to curb the 'pre-loading' of individuals with cheap alcohol before entering pubs and clubs and should prompt an overall shift in consumer preference away from very strong drinks. The ample evidence gathered from the research in Canada linking price and consumption is accepted and an anticipated fall in overall consumption of over 3% is most welcome, but does lead to a question concerning the value in setting the price at such a level; If 50p per unit were adopted this would have an even greater impact. It may also prompt further beneficial changes such as producers lowering the alcohol content to keep prices 'affordable' as in the case of Wine.

ACPO Cymru maintains that the availability of cheap alcohol would be best addressed through the introduction of a MUP set at a level that will impact on excessive alcohol consumption. Available evidence suggests that a minimum unit price of alcohol of 50p (54p when adjusted to inflation) per unit would yield more significant reductions in crime and disorder.

Consultation Question 2:

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

Yes X	No	Don't Know
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ACPO Cymru would suggest health is a significant consideration; The longer term or chronic impact upon an individuals health may not appear to have such an obvious impact on Policing, however the link between habitual alcohol misuse or 'alcoholism' and domestic violence, self harm are well established and create a significant demand on policing resources as well as the obvious harm to families and communities. The acute or short term impact upon an individual's health also has a significant impact upon policing resources who are called upon to deal with the sudden and unexplained deaths or collapsed persons in public places.

Consultation Question 3: How do you think the minimum unit price set by the Government should be adjusted over time?	
Do nothing – the minimum unit price should not be adjusted	Disagree as impact will fade with time.
The minimum unit price should automatically be updated in line with inflation each year	X It is important to note that due to inflation since the Sheffield model was published in 2009 a MUP of 50p is now valued at 54p
The minimum unit price should be reviewed after a set period?	Yes- reviewed to consider impact.
Recommend supporting Scottish Health experience and Public Health Wales' position that MUP should be reviewed at set periods of time – in Scotland at 3, 6 and 12 months.	

Consultation Question 4: The aim of minimum pricing is to reduce the consumption of harmful and hazardous drinkers, while minimising the impact of 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?		
Yes X	No	Don't Know
<p>In consultation with partners ACPO Cymru would suggest that the following groups are going to be affected:</p> <ul style="list-style-type: none"> • Children and young people. A MUP of 50p will result in fewer children and young people being exposed to parental alcohol misuse. • Employers. A MUP of 50p will result in a reduction of over 440,000 days lost to alcohol related absenteeism per year. • Pubs. Cheap alcohol in the off trade has contributed to the decline of the local British pub. Recent surveys have highlighted that the majority of pub landlords support the MUP. • Victims of crime; a MUP of 50p will result in 18,000 fewer crimes per year. • There will be implications for retailers, particularly supermarkets, which use alcohol sales as a loss-leader. It is anticipated that price reductions of other products will be used to maintain customer numbers and ensure that additional alcohol costs are off-set as offers are moved to non-alcohol sales. The average shopper should be no worse off and those with low alcohol consumption may be better off. 		

Consultation Question 5:

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

Yes **X**

No

Don't Know

ACPO Cymru would fully support any effort to reduce the excessive consumption of alcohol by individuals. The practical application of this policy may be problematic and have a disproportionate impact upon the small retailer who may feel the economic squeeze more than the supermarket chains who are better placed to adjust their marketing strategies, for example 'buy two' and get a discount on another product, or free glasses, snacks etc. Supermarkets are known to use a 'loss leader' to get customers into their stores and the reality is that they are able to sell below production cost which can contribute to issues of 'pre-loading' at home. When considering the volume of alcohol sold at any given time, it may be more effective to look at bottle size for example a ban on 3 litre bottles of Cider.

ACPO Cymru also note the impact of such a ban on multi-buy discounts could also see the re-introduction of the 'booze cruise' and the establishment of a black market economy for cheap alcohol sold through unregulated outlets in a similar fashion to tobacco.

Consultation Question 6:

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

Yes **X**

No

Don't Know

Available evidence suggests that any promotion that promotes and encourages the purchase of more alcohol than intended should not be permitted. This should encompass the following:

- 'All you can' drink promotions;
 - Promotions offering money off incentives;
 - Multi-buy promotions in the on trade; and
 - Loyalty schemes such as those offering points for alcohol purchases.
- In support of the National ACPO group and to add that any limitations should be very well defined e.g. it is illegal for a licensed premises to charge an entry fee and then all you can drink for free. However, it is legal to charge for entry and every drink 1p.

Consultation Question 7:

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

Yes **X**

No

Don't Know

ACPO Cymru believes a ban on multi-buy promotions combined with a MUP of 50p would significantly reduce the harm and costs associated with alcohol misuse. A survey conducted by Alcohol Concern in conjunction with Balance North East (2012) found that promotions on alcohol amongst those aged 16 – 24 years encouraged this population group to drink more than they would otherwise.

Rather than deal with the harm of alcohol misuse retrospectively; evidence suggests that it is more effective to address the prevalence of alcohol related harms through the reduction of alcohol related deaths; hospital admissions; absenteeism; and of significance to the police crimes.

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?

Yes **X**

No

Don't Know

ACPO Cymru believes that the following population groups will benefit from a ban on multi-buy promotions:

- Front line Police Officers, Community Support Officers and Police Staff
- Ambulance Services; Hospitals; in general any 'Front line' service would deal with a reduced numbers of the population affected by alcohol misuse.
- Children and young people would be less incentivised to drink more than they otherwise would choose to

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)?

		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?

Yes **No X** Don't Know

Mandatory licensing conditions do not do enough to target irresponsible promotions in pubs and clubs. ACPO Cymru would support restrictions being applied to irresponsible promotions that encourage excessive drinking in pubs and clubs. This also needs to be extended to events organised by third parties to promote Higher Education Fresher's Week and other similar events. In addition to the above:

No. Paragraph 2 of Article 3 Schedule Mandatory Licensing Conditions should be amended as shown below:

(2) In this paragraph, an irresponsible promotion (by any means) includes, but is not restricted to, ~~means any one or more of the following activities, or substantially similar activities, carried on for the purpose of encouraging the sale or supply of alcohol for consumption on the premises in a manner which carries a significant risk of leading or contributing to crime and disorder, prejudice to public safety, public nuisance, or harm to children—~~

- (a) games or other activities which require or encourage, or are designed to require or encourage, individuals to—
- (i) drink a quantity of alcohol within a time limit (other than to drink alcohol sold or supplied on the premises, or
 - (ii) drink as much alcohol as possible (whether within a time limit or otherwise);
- (b) provision of unlimited or unspecified quantities of alcohol or for a fixed or discounted fee or free to the public or to a group defined by a particular characteristic (other than any promotion or discount available to an individual in respect of alcohol for consumption at a table meal, as defined in section 159 of the Act);
- (c) provision of free or discounted alcohol or any other thing as a prize to encourage or reward the purchase and consumption of alcohol over a period of 24 hours or less;
- (d) provision of free or discounted alcohol, where that provision is dependent on—
- An outline of the age verification policy and the requirement to produce an acceptable form of ID should be clearly displayed at the entrance and point of sale
 - Measures of dispense (paragraph 5) should be the default for sale. Offering a larger measure or up-selling should be prohibited.

Consultation Question 11:

Are there others 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?

Yes ☒ X

No

Don't Know

ACPO Cymru would like to acknowledge the solid foundations laid by Licensing Act of 2002 and further reinforced by the 2010 Order, these are generally considered by members to be to be proportionate and effective in allowing Police and Partners to robustly manage those premises with an 'on licenses'.

ACPO Cymru suggest that the following additional mandatory conditions should be in place :

- A ban on credit or debit cards being placed behind the bar to run up a tab.
- Improved labelling of drink dispensing equipment; for example bar pumps that display alcohol units per measure, together with recommended limits.
- Customer safety – this should include reference to the provision of accredited training for door staff;
- Illegally produced alcohol – licensing conditions should be imposed to restrict the production of illegally produced alcohol.
- Non alcohol drinks – to be cheaper than the cheapest alcoholic drink, fresh water should be just that and chilled
- Smaller measures – wine should not be sold in measures of 250ml as this is likely to contain 2.5 to 3.5 units of alcohol.
- Responsible Messages – licensed premises should be responsible for promoting sensible drinking and harmful drinking messages, including displaying the 5 mandatory licensing conditions on the majority of alcohol labels.
- Mandatory licensing conditions should include consideration of customer safety. This might include a requirement of door staff in (say) town centre locations and criteria for the training and accreditation of those staff.
- There is a risk associated with alcohol fuelled football related violence. Local licensing allows conditions to be imposed on the sale of alcohol to mitigate these risks (e.g. no alcohol sales between 12:00 -22:00 on match day Saturdays).
- Point of sale information on units of alcohol and recommended limits should be compulsory.
- Lower strength beers and wines should be promoted.

Consultation Question 12:

Do you think the current approach with five mandatory licensing conditions applying to the online trade and only one of those to the off trade is appropriate?

Yes	No X	Don't Know
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ACPO Cymru would consider that conditions relating to irresponsible promotions should be applicable to both the on and off trade. It is well documented that licensed premises sell alcohol late into the evening and there is plenty of evidence to suggest that 'pre-loading' of cheap alcohol has a negative impact.

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?

ACPO Cymru welcomes a vibrant and diverse night time economy taking a proportionate and considered approach to the saturation of licensed premises within our City and Town centres and welcome the use of Health as a means to managing licensing applications. With regard to sources of data; in consultation with our partners the following sources may be useful indicators

- Alcohol in the workplace;
- Alcohol related deaths;
- Anti-social behaviour statistics associated with alcohol misuse;
- Crime and disorder statistics with specific reference to alcohol misuse;
- Foetal alcohol syndrome;
- Liver disease;
- Number of admissions associated with those aged 18 and under to Accident and Emergency departments;
- Numbers of alcohol related conditions seen by General Practitioners across Wales;
- Numbers of calls attended by ambulance services in respect of alcohol associated emergency calls;
- Number of children and young people taken into care due to parental negligence associated with alcohol misuse;
- Numbers of drink drivers; Treatment and availability of provision; and
- Numbers of patients referred to Accident and Emergency with alcohol related matters.

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 harms?

Yes X	No	Don't Know
<p>The ACPO Cymru position would be in support of our partners and that the protection of public health should be introduced as a fifth licensing objective rather than aligning health harm to CIPs.</p> <p>Clear guidance will be needed for licensing officials concerning the practicalities of what health information may be used when considering the introduction of a CIP. There needs to be a more robust regulation of the 'home delivery' market. There should also be an examination of the ethical aspects of garages being allowed to sell alcohol and issues around drink driving.</p>		

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?

Allowing licensing authorities to consider alcohol related health harms will provide them with an additional tool to proactively refuse new applications and or extensions on the basis of local considerations. This will enable the effective control of the availability of alcohol and density of outlets selling alcohol on a locality basis.

Consultation Question 16.

Should special provision to reduce the burdens on ancillary sellers be limited to specific types of businesses, do you think it should apply to the following?

		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?

		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 and 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?

No and would suggest alcohol is not treated in the same way as other goods.

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 maintaining the effectiveness of enforcement – paragraphs 9.2 and 9.3. Do you think that the qualification criteria proposed in paragraph 9.6 meets this aim?

Yes	No X	Don't Know
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The issue of ancillary sales is not clear cut, for instance the Bed and Breakfast premises mentioned in the consultation are often grouped together, providing short to medium accommodation for particular demographic groups, not necessarily the short term holiday makers envisaged. Providing alcohol to problematic and/or vulnerable residents under these circumstances would divert Police focus away from the traditional locations of licensed premises namely town centres. Alcohol in Hairdressers and Florists may be equally problematic and a drain on Police resources. The definition leaves considerable scope for interpretation. The amount of alcohol on offer requires clear definition and as such should be treated with caution. Accommodation providers could range from a B&B to a social services housing provider or a 500 bed hotel. This needs to be very specific. What is meant by “regular” in terms of a charitable event? This is open to wide interpretation and abuse.

Consultation Question 20: Do you think that these proposals would significantly reduce the burdens on ancillary sellers?				
		Yes	No	Don't know
A	Allow premises making ancillary sales to request in their premises license application that the requirement for a personal license 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 license 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 license holder	X		

South Wales Police Specific comment: Yes, it reduces the burdens but not in a positive way. Our response would be to agree with B above – that there should be the need for a personal licence holder to avoid a situation where any person, qualified or not, can sell alcohol.

Consultation Question 21: Do you think that the following proposals would impact adversely on one or more of the licensing objectives?				
		Yes	No	Don't know
A	Allow license premises making ancillary sales to request their premises license application that the requirement for a personal license 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 license holder.	X		
C	Introduce a new light touch form of authorisation for premises making ancillary sales – and “ASN” but with no requirement for a personal license holder.	X		

Consultation Question 22:

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

ACPO Cymru suggests that it would be appropriate for a Cumulative Impact Statement to be undertaken with respect to the area in which the ancillary trader would be trading. To support this there should be a mechanism in place to revoke or remove an ancillary sales notice and to restrict the hours of operation.

Consultation Question 23:

Do you agree that licensing authorities should have the power to allow organisers of community event involving licensable activities to notify them through a locally determined notification?

Yes	No x	Don't Know
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South Wales Specific Comment to support the 'No' position .The local notification process is very narrow and does not take into account the local community. There can be some very large and regular community events such as Party in the Park which is a "community" event run by the local council but which has a huge impact on local residents. If unregulated, there would be a high possibility that licensing conditions would be breached.

Consultation Question 24:

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

		Yes	No	Don't know
A	Reduce the burden.	X		
B	Increase the burden.			

Consultation Question 25:

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

Yes	No X	Don't Know
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TENS as a 'bolt on' for community groups to sell alcohol for an event work well and ACPO Cymru would object to the de- regulation divergence from the current from the TENS process.

Consultation Question 26: If yes please select one option to indicate which you would prefer:	
15	No X
18	
Don't know	

Where a personal license holder has the facility to apply for up to 50 TENS or 12 per premises in a given year there a sound argument that exceeding these numbers would actually be considered normal business and the licensee should apply for an appropriate 'on license' which would remove all bureaucracy and allow the full safeguards of the Licensing Act to apply. The timescales involved in each application are usually the cause of friction, however they are in place for good reason; it gives local agencies and Police management team's time to consider the matter and arrange additional resources.

Consultation Question 27: Do you think that licensing authorities should have local discretion around late night refreshment in each of the following ways?				
		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	

Provided a level of control is maintained through local licensing bodies there would be no fundamental objection from ACPOC, although robust guidance would required to ensure neighbouring areas do not have vastly different policies or approaches.

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?				
		Yes	No	Don't know
A	Motorway services should receive a nationally prescribed exemption from regulations for the provision of late night refreshment.		X	

In considering the proposal to allow Motorway Service Areas (Garages and Shops) to sell alcoholic refreshments ACPOC would point out that Alcohol and Motorways are never going to be a safe combination and this could well lead to a raise the mortality rate on our motorway network or in the least send an inappropriate message about drink driving and could increase offending.

ACPOC would strongly urge the UK Government to abandon this proposal.

However If this proposal is adopted ACPOC having consulted with partners in Alcohol Concern Cymru would strongly urge that the following conditions would apply:

1. It should be a mandatory requirement that drink-drive warnings be displayed at the point of sale at all petrol stations where alcohol is also available for purchase. Such warnings would serve to support ongoing awareness raising campaigns concerning the dangers of drinking and driving.
2. It should be a condition that any petrol station applying for an alcohol licence must be able to demonstrate that it will either buy-in, or provide themselves, thorough training for staff on responsible alcohol sales practices for its staff.
3. A review of the effectiveness of bans on alcohol sales from petrol stations, and alternative measures undertaken in other countries, should be undertaken to inform discussions about the appropriateness of an equivalent measures being implemented in England and Wales.
4. In recognition of the growth of alcohol as a public health issue, and in order to enable licensing authorities to properly address this, the protection and improvement of public health must be established as a fifth criterion within the Licensing Act 2003 for assessing license applications, including those from petrol stations.

Consultation Question 29:

Please describe any other types of premises to which a nationally prescribed exemption should apply.

ACPO Cymru does **not** support a nationally prescribed exemption, that includes alcohol sales in Hotels, Motels and Lodges. ACPOC would take the current situation into consideration and note that the majority of accommodation providers are already linked to a hospitality chains for example 'Travel Lodge' and 'Harvester' and these mutually beneficial shared site arrangements cause little concern. ACPOC would no object to this proposal and would like to take the opportunity to contribute to any future mandatory licensing conditions for example drink drive warnings on the Mini bar and the dangers of driving the next day (having consumed alcohol the evening before).

Consultation Question 30: Do you agree with the following proposals?				
		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 MSAs for the on and off trade.		X	
C	Remove the centrally imposed prohibition on the sale of alcohol at MSAs but only in respect of overnight accommodation – “Lodges”.		X	
D	Remove or simplify requirements to renew personal licenses under the 2003 Act.		X	

Consultation Question 31: Do you think that each of the following would reduce the overall burdens on business?				
		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 MSAs for the on and off trade.			X
C	Remove the centrally imposed prohibition on the sale of alcohol at MSAs but only in respect of overnight accommodation – “Lodges”.			X
D	Remove or simplify requirements to renew personal licenses 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?				
		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 MSAs for the on and off trade.	X		
C	Remove the centrally imposed prohibition on the sale of alcohol at MSAs but only in respect of overnight accommodation – “Lodges”.	X		
D	Remove or simplify requirements to renew personal licenses under the 2003 Act.	X		

Consultation Question 33:

In addition to the suggestions outlined above, what other sections or processes under the 2003 Act could in your view be removed or simplified in order to impact favourable on businesses without undermining the statutory licensing objectives or significantly increasing burdens on licensing authorities?

A mechanism needs to be in place locally to enable members of the public to share their views with respect to licensing applications and associated decision making processes.

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?

		Yes	No	Don't know
A	Minimum unit pricing.			X
B	Multi-buy promotions.			X
C	Health as an objective cumulative impact.			X
D	Ancillary sales of alcohol.			X
E	Temporary event notices.			X
F	Late night refreshment.			X
G	Removing duty to advertise licensing applications in local newspapers.			X
H	Sales of alcohol at motorway stations.			X
I	Personal licenses.			X

Consultation Question 35:

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

Yes	No X	Don't Know
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The sentiment within the impact assessments appears to be considered and valid, however the data is old and ACPOC, it is not in a position to challenge or accept the validity of the data used. The night time economy is susceptible to economic trends and would urge caution in forging ahead with assumptions based upon old data. 'Preloading', 'Alcohol banking' and the rapid rise in the use of New and Emerging drugs that are cheaper than alcohol have changed consumption habits, further research is needed.

Summary

Strategic

The link between alcohol consumption, violence and anti social behaviour and many other forms of criminal behaviour are well established. With the exception of 'reducing bureaucracy for responsible businesses' all of these proposals are aimed at reducing alcohol consumption and will therefore support the strategic aims of the Police service and have the support of ACPO Cymru.

Tactical

The proposals within the 'reducing bureaucracy for responsible businesses' could cause new demands and unintended consequences for the Police Service. The proposals around motorway service areas and ancillary sales have the potential to change every hairdresser into a pub, furthermore if the unique nature of alcohol changes to 'just an other commodity' it may further undermine many of the other mandatory licensing conditions or at the very least leave them open to challenge and ACPO Cymru would urge caution against the possibilities of unintended consequences.