

Alcohol strategy consultation

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Page 1: About you

Q1. Please select if you would like your response or personal details to be treated as confidential.

Treat as confidential

Score

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Q2. Which of the following best describes you or the professional interest you represent? Please select one option from the menu below.

Local government (other)

Please specify which organisation, licensing authority or police force you represent in the box below:

Score

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Q3. If you are responding on behalf of an organisation or interest group, please write in the box below the number of members in your group or organisation.

No Response

Q4. How did you obtain the views of your members? Please explain in the box below keeping your response to a maximum of 100 words.

Q5. Please indicate in which region you or your organisation is based. Please select one option from the menu below.

North West England

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Q6. If you are responding as a member of the public, what is your gender? Please select one option.

No Response

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Q7. If you are responding as a member of the public, what is your age? Please select one option.

No Response

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Page Score

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Page 2: A minimum unit price for alcohol

Q8. In the alcohol strategy, the government committed to introducing a minimum unit price for alcohol in England and Wales. This consultation will contribute to the debate on the most appropriate price per unit and the mechanism by which, once set, minimum unit pricing would remain effective. It is also an opportunity for interested parties to raise other issues around minimum unit pricing. The purpose of minimum unit pricing is to reduce alcohol consumption, particularly by the most hazardous and harmful drinkers who tend to show a preference for the cheapest alcohol products. By doing so the government estimates there will be a reduction in the associated crime and health harms, especially the numbers of hospital admissions, alcohol-related deaths and alcohol-related crimes. Minimum unit pricing is not intended disproportionately to affect responsible drinkers or particular social groups but to reduce the availability of alcohol sold at very low or heavily discounted prices. More information (including the definitions of hazardous and harmful drinkers) is available in the full consultation document and the impact assessment. Do you want to answer questions on minimum unit pricing? Please select one option.

Yes

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Page 3: A minimum unit price for alcohol

Q9. 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.

No

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):

No. A level of 50p would achieve a greater impact given the level of local alcohol related harm. The Government MUP of 45p is above the statistical 'tipping point' of 40p. However greater benefits are felt up to 50p as shown below - and quite rapidly according to the latest data. Deaths Hospital admissions Days absent from work Crimes Minimum unit price at 40p 1,380 lives saved 40,800 reduction 100,000

less 16,000 avoided Minimum unit price at 50p 3,400 lives saved 98,000 reduction 300,000 less 46,000 avoided The research by Sheffield University supports this view of a 50p per unit of alcohol to have maximum impact on irresponsible drinking; i.e. hazardous and harmful drinkers while imposing a minimal financial effect on moderate drinkers and on-trade sales. This analysis is endorsed by authoritative national reviews, including: \ Sir Liam Donaldson 'Our Health Our Nation: The Chief Medical Officer Annual Report' (2009) \ Alcohol Concern 'The Price is Right' (2009) \ The House of Commons Health Committee Report on Alcohol (2009) \ National Institute of Clinical Excellence (NICE) Clinical Guidelines (2010)

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Q10. Should other factors or evidence be considered when setting a minimum unit price for alcohol? Please select one option.

Yes

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

Yes. MUP is the fairest and best evidenced but least understood response: - A tax increase would affect all drinkers. - Evidence on policy approaches is weak (e.g. industry self-regulation and public information campaigns) - Education about MUP on its own isn't enough. More needs to be done to raise public awareness given limited understanding from the public. It is also widely acknowledged that much of the harm to communities, families and children and to the wider economy arises from excessive drinking at home - from 'preloading' and 'off' sales. Current licensing also favours the off trade and not the on trade. Public Houses used to be the focal points of local communities and are easier for the authorities to regulate than drinking at home in unlicensed conditions. The consultation does not fully address what is a missed opportunity to 'save our pubs' and make them more appealing to families and those at risk from cheap alcohol.

Score

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Q11. 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.

The minimum unit price should automatically be updated in line with inflation each year

Score

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Q12. The aim of minimum unit pricing is to reduce the consumption of harmful and hazardous drinkers, while minimising the impact on responsible drinkers. Do you think that there are any other people, organisations or groups that could be particularly affected by a minimum unit price for alcohol? Please select one option.

Yes

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

Yes. The wider costs of alcohol misuse an estimated £22.1 billion per year which is the equivalent of £419 per person every year. The impact is widespread across many groups and interests: • £7.6 billion in costs to the community caused by alcohol related crime • £8.4 billion in costs to the workplace/wider economy affected by alcohol • £1.9 billion in costs from social care of children and families affected by alcohol misuse.

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Page 4: A ban on multi-buy promotions in the off-trade

Q13. The government is consulting on introducing a ban on multi-buy promotions in the off-trade (e.g. shops and off-licences) as part of its wider strategy to reduce excessive alcohol consumption, and alongside the introduction of a minimum unit price. A ban on multi-buy promotions would therefore not apply to pubs, clubs, bars or restaurants. The term 'multi-buy promotions' refers to alcohol promotions that offer a discount for buying multiple items. The aim of a ban would be to stop promotions that encourage people to buy more than they otherwise would, making it cheaper (per item) to purchase more than one of a product than to purchase a single item. As well as being part of a wider strategy to reduce consumption and tackle irresponsible alcohol sales, a ban on multi-buy promotions would also contribute to the government's aim of encouraging people to be aware of how much they drink and the risks of excessive drinking, so that they can make informed choices. The aim of this consultation is to assess support for such a ban and contribute to our understanding of the impact a ban on multi-buy promotions may have. The types of promotion it is proposed that a ban would include, are: two for the price of one, three for the price of two, buy one get one free, buy six and get 20 per cent off, 24 cans of lager costing less than 24 times the cost of a single can of lager in the shop, a case of wine sold cheaper than the individual price at which the same bottles are sold in the shop, 3 for £10 where each bottle costs more than £3.33. More information is available in the full consultation document and the impact assessment. Do you want to answer questions on a ban on multi-buy promotions in the off-trade? Please select one option.

Yes

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Page 5: A ban on multi-buy promotions in the off-trade

Q14. Do you think there should be a ban on multi-buy promotions involving alcohol in the off-trade? Please select one option.

Yes

Score

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Q15. Are there any further offers which should be included in a ban on multi-buy promotions? Please select one option.

Yes

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

Yes. A ban on all forms of multiple purchasing should be introduced. This needs to extend beyond e.g. 'buy 3 for £10' offers (where the same wine is not available per bottle for £3.33 encouraging the purchaser to go for 3 bottles rather than 1. This also needs to tackle misleading offers where the original price was not at the claimed earlier level.

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Q16. Should other factors or evidence be taken into account when considering a ban on multi-buy promotions? Please select one option.

Yes

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

Yes. Multi buy promotions add to a burden on health and criminal justice and the local community. Alcohol is 45% more affordable today, in relative terms, than it was in 1980. Supermarkets and off licences (the off trade) are selling alcohol in some regions of England for as little as 12p a unit - cans of lager at just 22p, a 70cl bottle of vodka for £6.98 and a two-litre bottle of cider costing less than a loaf of bread. At such low prices, today's young people, with the national average of £6.24 a week pocket money could drink twice the daily recommended amount for a man or a woman every day. Sales from the off trade account for almost half of all alcohol sold in the UK and drinking at home increased by 18% between 1997 and 2007.

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Q17. 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

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

Yes. The Government estimate an impact on Police Licensing and Trading Standards Officer's time of 1 - 3 hours per week but acknowledge that this has not been widely tested. If a Mandatory Condition were imposed the lead would be likely to come from the Police Licensing Officer as such breaches are Section 136 offences. It is important to emphasise that the ban would directly reduce the availability of cheaper alcohol to younger drinkers who often use such offers for 'pre-loading' and discourage excess alcohol use amongst adult harmful and hazardous drinkers and this would add to the impact of a MUP of 50p as the Sheffield research shows. 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 from children A Irresponsible Promotions Yes Yes Yes Yes B Dispensing alcohol directly into the mouth Yes Yes Yes No C Mandatory provision of tap water Don't Know Don't Know Don't Know Don't Know D Age verification policy Yes Yes Yes Yes E Mandatory provision of small measures Yes Yes Yes No

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Page 6: Reviewing the mandatory licensing conditions

Q18. In its response to the 'Rebalancing the Licensing Act' consultation in 2010, the government committed to review the impact of the current mandatory licensing conditions. More recently, the alcohol strategy made a commitment to review these mandatory licensing conditions to ensure they are sufficiently targeting problems such as irresponsible promotions in pubs and clubs. The government has also committed to consult on whether these mandatory licensing conditions should, where relevant, apply to both the on- and off-trade. This consultation forms part of that review, and will contribute to the government's understanding of how these mandatory conditions are perceived. The five mandatory licensing conditions currently set out in regulations in relation to the supply of alcohol are: a ban on irresponsible promotions a ban on dispensing alcohol by one person directly into the mouth of another a requirement to provide free tap water on request to customers a requirement to have an age verification policy to prevent the sale of alcohol to persons under 18 years of age, and a requirement to make available to customers small measures such as half pints or beer or cider or 125ml glasses of wine More information is available in the full consultation document. An explanation of each of these terms can be found on page 20 of the consultation document, in the glossary at the end. Do you want to answer questions on reviewing the mandatory licensing conditions? Please select one option.

Yes

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Page 7: Reviewing the mandatory licensing conditions

Q19. Do you think each of the mandatory licensing conditions is effective in promoting the licensing objectives? For more information on the licensing objectives please see the glossary at the end of the full consultation document. 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	Yes
Dispensing alcohol directly into the mouth	Yes	Yes	Yes	No
Mandatory provision of free tap water	Don't know	Don't know	Don't know	Don't know
Age verification policy	Yes	Yes	Yes	Yes
Mandatory provision of small measures	Yes	Yes	Yes	No

Score

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Q20. Do you think that the mandatory licensing conditions do enough to target irresponsible promotions in pubs and clubs? Please select one option.

No

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

No. There remains widespread ignorance amongst the general public about the impact of drinking too much alcohol. A fuller assessment is required as it is difficult for the Responsible Authorities locally to fully assess the full impact that the Mandatory Code has had on alcohol related harm. Further conditions would probably focus on: - Assessing the merits of the 'Challenge' Schemes - Provision of free tap water needs to be made more prominent - Availability of small measures of beer wine and spirits needs to be more prominent

Score

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Q21. Are there other issues related to the licensing objectives which could be tackled through a mandatory licensing condition? Please select one option.

Yes

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

Yes. Business needs to be subject to more restraint than is currently feasible under the Licensing Act 2003 in 3 technical areas: I. The sale of high-strength beers and lagers in the most vulnerable communities – which have the greatest numbers of off licenses II. The numbers of those off licenses which are not local sole ownership - sole licensee concerns – but where one business will own multiple premises – reducing local individual accountability III. The distance between such businesses in many vulnerable areas can be measured in metres as much as kilometres There needs to be a more innovative approach to the use of the licensing objectives. A voluntary agreement with the 'off' trade is unlikely to

achieve 100% coverage without a local 'impact' policy. Such a policy needs to be backed by conditions as to the sale of stronger beers, lagers, ciders within a designated zone. There needs to be consideration of the strength of alcohol sold in some 'on sale' venues to address the impact of binge drinking directly which would derive from any 'Cumulative Impact Policy' focussed on: the nature and style of the venue, the activities being conducted there, the location and anticipated clientele.

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Q22. Do you think that 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.

No

If no, please explain why you think the current approach is not the best approach (keeping your views to a maximum of 100 words):

No. The level of information required of the 'off trade' is minimal and will have a limited impact on a general public already confused by healthy drinking information: - A mandatory 'Challenge 25' condition should be imposed for the 'on' and 'off' trade given the continued levels of under-age sales of alcohol and to discourage binge drinking amongst the under 25s. - Once the recommendations of the Chief Medical Officer are known then information about safe levels of drinking of alcohol must be prominently displayed at the point of sale in simple, punchy and credible language, all ages will understand.

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Page 8: Health as a licensing objective for cumulative impact policies

Q23. We want to ensure that licensing authorities are able to take alcohol-related health harms into consideration when making decisions about cumulative impact policies (CIPs) which can be used to manage problems linked to the density of premises in specific areas. A CIP introduces a rebuttable presumption that all new licence applications and variations in that area will normally be refused if the licensing authority receives a relevant representation stating that the application will add to the cumulative impact. However each application must still be considered on its own merits and the licensing authority may still grant the application if it is satisfied that the application will not contribute to the cumulative impact. We are proposing that licensing authorities will be able to take evidence of alcohol-related health harm into account in deciding whether to introduce a CIP and the extent of that CIP. This would be a discretionary power and not an obligation. We expect that those areas with the highest levels of alcohol-related health harm, or fast rising levels of harm from alcohol, will be most likely to use this power. It will allow local health bodies to fully contribute to local decision making and mean licensing authorities can restrict the number of licensed premises in the local area on the basis of robust local evidence. More information is available in the full consultation document and impact assessment. Do you want to answer questions on health as a licensing objective for cumulative impact policies? Please select one option.

Yes

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Page 9: Health as a licensing objective for cumulative impact

policies

Q24. 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):

Individual evidence from health may feature in only a very small number of cases e.g. an Accident and Emergency Consultant evidence if a premises causes concern. The advantage of a CIP approach is that the burden of proof shifts to the applicant. The weakness of the current law is that under the Licensing Act 2003 public health data is not evidence, being not sufficiently proximate to the precise location of sale.

This was examined exhaustively in a study of Oldham licensing undertaken by Greater Manchester Police. Salford's Joint Strategic Needs Analysis has provided opportunities to develop analysis of correlations by Lower Super Output Area for a wide range of data about local communities:

- Alcohol related hospital admissions for the under and over 18s
 - Alcohol treatment under and over 18s
 - Alcohol related incidents and crimes
 - Domestic violence
 - Anti-social behaviour
 - Traumatic Injury Information Group (TIIG) and Trauma Audit and Research Network (TRAN) Accident and Emergency and Ambulance data
 - Soft data e.g. text analysis of call out records from the North West Ambulance Service, compared with data from Acute Hospital, Adult and Child Safeguarding, Children's Services, Police and Probation Services, MARAC
-

Q25. 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

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

Yes. The Director of Public Health will be best placed to collect and collate health-related information for use by the licensing authority. In the North West Blackpool has had such a policy in place for over 2 years. Public Health returning to Local Authorities widens such opportunities further, despite the restrictions of the Licensing Act 2003. Salford has the highest number of off licenses outside of Greater London) and a range of health and criminal justice and social concerns. Notwithstanding all of the above individual enforcement and CIP approaches will still have a relatively marginal impact on the actual numbers of off licenses in any area. This strengthens the importance of a minimum unit price but also consideration of the innovative use of the Licensing Act 2003 e.g. licensing conditions prohibiting the sale of strong beers, lager and ciders in a small geographical area as has been achieved in some areas e.g. Bury.

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Q26. 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 your answer in the box below, providing evidence to support your response (keeping your views to a maximum of 200 words):

Blackpool have has a Cumulative Impact Policy in place for over two years. This has put the burden of proof onto the applicant, to show that the application is not adding to the burden of alcohol related harm in designated areas with existing high levels alcohol related harm and health and social inequality.

In Salford the Joint Strategic Needs Analysis shows which areas of the city experience the greatest burden of alcohol related harm and health and social inequality. Salford has some of the worst levels of alcohol problems and second highest number of off licenses already in the country. The volume of licensed premises in the area may not increase as it would otherwise have done and may gradually reduce. However, there should also be a positive overall impact on the night-time economy and a benefit

to reduced health and crime and social costs.

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Page 10: Freeing up responsible businesses

Q27. The government has committed to consult on giving licensing authorities greater freedom to take decisions that reflect the needs of their local community. Following the government's Red Tape Challenge in 2011, three areas of reform were specified: alcohol licensing for certain types of premises providing minimal alcohol sales, temporary event notices (TENs) and the licensing of late night refreshment. This section asks for views on these proposals and suggests further ways to reduce burdens on business. The proposals set out here can be seen alongside work undertaken by the Department for Culture, Media and Sport to remove unnecessary red tape from regulated entertainment. More information on each of these areas for reform is available in the full consultation document. There are five subjects covered in this section. They are: ancillary sales of alcohol, occasional provision of licensable activities at community events, an extension of the temporary event notice limit at individual premises, late night refreshment, and further proposals to reduce burdens on business. Do you want to answer questions on freeing up responsible businesses? Please select one option.

Yes

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Page 11: Freeing up responsible businesses

Q28. Ancillary sales of alcohol. For many businesses, the sale of alcohol is only a small part of, or incidental to, their wider activities, and occurs alongside the provision of another product or service (which this consultation refers to as an 'ancillary sale'). For example, a guesthouse might wish to provide wine to its guests with an evening meal or a complimentary bottle of wine in a guest's room, while a hairdresser might wish to offer clients a glass of wine. 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
The provision should be limited to a specific list of certain types of business and the kinds of sales they make		X	
The provision should be available to all businesses providing they meet certain qualification criteria to be an ancillary seller	X		
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		X	

Score

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Q29. If special provisions 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		X	
Hair and beauty salons, providing alcohol alongside a hair or beauty treatment		X	
Florists, providing alcohol alongside the purchase of flowers		X	
Cultural organisations, such as theatres, cinemas and museums, providing alcohol alongside cultural events as part of the entry ticket		X	
Regular charitable events, providing alcohol as part of the wider occasion		X	

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Q30. 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 suggestions in the box below, keeping your views to a maximum of 200 words:

No.

[REDACTED] after the initial license application via an ongoing 'risk assessment' so 'low risk' accommodation providers, hair and beauty salons, florists, cultural organizations and charitable event organizers would not expect a higher burden of administration.

Q31. 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?

No

Please use the space below to provide further comments (keeping your views to a maximum of 200 words):

The preferred approach is a universal one; anyone wishing to sell alcohol including those who are sellers of alcohol where this is ancillary to their main purposes, should all apply via the same process. The reduction in enforcement checks and advice visits will naturally follow the risk each seller poses. Responsible sellers thereby receive a proportionate response and level of demand from the licensing authorities. Deregulation has the capacity to become perverse and over complex. A universal approach with a clear 'risk assessment' policy is fair to all over time and best manages those sellers who purport to be what they are not to avoid licensing regulation while placing the lowest burden on sellers who have clearly demonstrated the trust of the local community is well placed.

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Q32. 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

Allow premises making ancillary sales to request in their premises licence application that the requirement for a personal licence holder be removed	X
Introduce a new, light-touch form of authorisation for premises making ancillary sales - an ASN but retaining the need for a personal licence holder	X
Introduce a new, light touch form of authorisation for premises making ancillary sales - an ASN - with no requirement for a personal licence holder	X
Score	
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Q33. 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	X		
Introduce a new, light-touch form of authorisation for premises making ancillary sales - an ASN but retaining the need for a personal licence holder		X	
Introduce a new, light touch form of authorisation for premises making ancillary sales - an ASN - with no requirement for a personal licence holder	X		
Score			
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Q34. 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 response to a maximum of 200 words:

The definition of an 'Ancillary Seller' is the key issue. The key areas to determine what is then a proportionate licensing response are:

- The frequency of the events
- The purpose of the events
- The strength of alcohol on sale (i.e. are such conditions relevant)
- The nature and style of the venue,
- The activities being conducted there
- The location
- The anticipated clientele

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Page 12: Freeing up responsible businesses

Q35. 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
Score
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Q36. 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
Reduce the burden	<input checked="" type="checkbox"/>		
Increase the burden		<input checked="" type="checkbox"/>	
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Page 13: Freeing up responsible businesses

Q37. Should the number of TENs which can be given in respect of individual premises be increased? Please select one option.

Yes
Score
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Q38. If you answered yes, please select one option to indicate which you would prefer. Please select one option.

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Page 14: Freeing up responsible businesses

Q39. 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="checkbox"/>		
Determining that certain premises types are exempt in their local area	<input checked="" type="checkbox"/>		
Score			
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Q40. 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
Score
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Q41. 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).

In general terms, the premises one would seek to regulate are those in a geographical area where crime and disorder (and poor health) coincide with excessive alcohol use and demand for alcohol treatment. However such issues may not arise around premises such as airports and motorway services. The licensing process needs to be driven by the risks posed by the type of customer and type of venue so that responsible applicants are risk assessed and face a lighter licensing burden.

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Page 15: Freeing up responsible businesses

Q42. Do you agree with each of the following proposals? Please select one option in each row.

	Yes	No	Don't know
Remove requirements to advertise licensing applications in local newspapers	X		
Remove the centrally imposed prohibition on the sale of alcohol at MSAs for the on and off-trade		X	
Remove the centrally imposed prohibition on the sale of alcohol at MSAs, but only in respect of overnight accommodation - lodges	X		
Remove or simplify requirements to renew personal licences under the 2003 Act			X
Score			
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Q43. 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
Remove requirements to advertise licensing applications in local newspapers		X	
Remove the centrally imposed prohibition on the sale of alcohol at MSAs for the on and off-trade	X		
Remove the centrally imposed prohibition on the sale of alcohol at MSAs, but only in respect of overnight accommodation - lodges		X	
Remove or simplify requirements to renew personal licences under the 2003 Act			X
Score			
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Q44. 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
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Remove requirements to advertise licensing applications in local newspapers	X	
Remove the centrally imposed prohibition on the sale of alcohol at MSAs for the on and off-trade	X	
Remove the centrally imposed prohibition on the sale of alcohol at MSAs, but only in respect of overnight accommodation - lodges	X	
Remove or simplify requirements to renew personal licences under the 2003 Act		X
Score		
0		

Q45. 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 keep your views to a maximum of 200 words.)

As to 'off' sales, cheap strong alcohol affects levels of crime, public safety, public nuisance and under age and family drinking. There needs to be a more innovative approach to the use of the licensing objectives. A voluntary agreement with the 'off' trade (e.g. Ipswich) is unlikely to achieve 100% coverage without a local 'impact' policy. Such a policy needs to be backed by conditions as to the sale of stronger beers, lagers, ciders within a designated zone.

As to 'on' and 'off' sales there may be merit in a simplified set of core conditions to address the four licensing objectives. Again, there needs to be consideration of the strength of alcohol sold in some venues to address the impact of binge drinking directly which would derive from any 'Cumulative Impact Policy' focussed on:

- The nature and style of the venue,
- The activities being conducted there
- The location
- The anticipated clientele

The key areas are effective:

- CCTV, radio
- Presence of a personal license holder
- 'Challenge 25' and 'proof of age' policies
- Use of glasses
- Management of capacity
- Management of the presence of children
- 'Pub Watch' schemes

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Page 16: Impact assessments

Q46. Impact assessments for the proposals in this consultation have been published alongside the full consultation document. 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
Minimum unit pricing	X		
Multi-buy promotions	X		

Health as a licensing objective for cumulative impact	X
Ancillary sales of alcohol	X
Temporary event notices	X
Late night refreshment	X
Removing the duty to advertise licence applications in a local newspaper	X
Sales of alcohol at motorway service stations	X
Personal licences	X
Score	
0	

Q47. Do you have any comments on the methodologies or assumptions used in the impact assessments? If yes, please specify in the box below, clearly referencing the impact assessment and page to which you refer (keeping your views to a maximum of 400 words).

While within the limited terms set by the consultation the impact assessments are fit for purpose, greater balance and transparency would have been achieved by a 'Public Health' and Community Impact Assessment undertaken in parallel.

The Impact Assessments overall do not fully reflect the weight of national and international health evidence of the burden alcohol related harm places on society whereas the costs to business seem to have greater prominence. Some Local, National and International examples are described below.

1. Alcohol Concern 'One on every corner' (2011)
2. Alcohol National Research Project (2004)
3. Burden of Liver Disease and Inequalities in the NW of England (2012)
4. AQUA's Improving Outcomes Pack for Chronic Liver Disease (2012)

Page Score	
0	

Scoring Summary

Pages	Total
1. About you	0
2. A minimum unit price for alcohol	0
3. A minimum unit price for alcohol	0
4. A ban on multi-buy promotions in the off-trade	0
5. A ban on multi-buy promotions in the off-trade	0
6. Reviewing the mandatory licensing conditions	0
7. Reviewing the mandatory licensing conditions	0
8. Health as a licensing objective for cumulative impact policies	0
9. Health as a licensing objective for cumulative impact policies	0
10. Freeing up responsible businesses	0

11. Freeing up responsible businesses	0
12. Freeing up responsible businesses	0
13. Freeing up responsible businesses	0
14. Freeing up responsible businesses	0
15. Freeing up responsible businesses	0
16. Impact assessments	0
Total Survey Score:	0