

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.

No Response

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.

Public health body (eg Primary Care Trust, Local Health Board, Director of Public Health)

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

Darlington Drug and Alcohol Action Team (part of Darlington Public Health)

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.

Consultation through Board, Commissioning Group and planning meetings - membership including local authority, police, NHS, fire, probation, service providers and voluntary sector organisations.

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

North East England

Score

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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

Score

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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

Score

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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

Score

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Page Score

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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.

Yes

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):

The DAAT believes that at least a 50p level would be more appropriate. The previous Chief Medical Officer recommended a level of at least 50p and this level is supported by the Faculty of Public Health and the Association of North East Council leaders. No justification has been given for why the England MUP should be different to the Scotland MUP. Modelling of a Unit Price of 50p by the University of

Sheffield has shown that annually a significant number of deaths, alcohol related hospital admissions and crimes would be prevented by a 50p minimum unit price compared to a 45p minimum unit price.

Score

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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):

Further modelling of the impact of different levels of MUP should be considered (eg <http://www.shef.ac.uk/scharr/sections/ph/research/alpol/publications>), and we believe that at least a level of 50p should be set. Having a different level to Scotland is likely to be confusing. Any evaluation of the effectiveness of the MUP and the level set should be independent. The minimum unit price set should be adjusted in line with inflation but it should also be reviewed after a set period to ensure it is achieving the desired results.

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

0

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):

It will impact on everyone. High costs to the NHS, Local Authority and Police are borne by the taxpayer. Local Darlington research by the police shows high levels of alcohol use in offenders Friday - Saturday. Evidence shows that minimum unit pricing will reduce consumption and consequently the costs for society. Children in particular suffer from parental alcohol misuse and are also encouraged to think drinking to excess is normal. They also have limited funds to buy alcohol and North East research on proxy purchasing has shown that they disproportionately drink cheap alcohol e.g. cider and cheap vodka

Score

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Page Score

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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

Score

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Page Score

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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):

It makes no sense to ban 2 - for - 1 but allow half price deals with a minimum quantity, because this is effectively 2 - for - 1. Any ban must include any promotion which encourages people to buy more than they planned e.g. minimum spend, discounts. We also think consideration should be given to banning multi-buy promotions in the on-trade as well as the off-trade, as these also encourage people to drink more than they otherwise would.

Score

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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):

The Sheffield University study suggests that a ban on multi buy promotions would increase the effectiveness of a MUP. It is clear that a MUP would be undermined if people could just circumvent it or lessen the impact by using multi buy promotions which would also encourage them to buy more than they had intended. Any bans should particularly take into account the impact on under age drinking. Local Darlington research suggests that young people first drink alcohol around age 12-13. Most children get alcohol from parents, but those with more serious levels of misuse are more likely to get alcohol from shops, clubs/bars and friends. Research on proxy provision suggests that due to limited funds children are particularly likely to obtain cheap cider and vodka. The impact on children should be considered.

Score

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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):

Young people who are more likely to binge drink and preload will benefit. Under 18s who have limited funds are less likely to obtain alcohol through proxy purchasing if multi buys do not make it easier to get cheap alcohol. Community pubs and the on trade will benefit as they lose business to local retailers in the off trade. The police and frontline services will benefit from the reduction in alcohol related disorder. Health services will benefit from any measure which decreases consumption

Score

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Page Score

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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

Score

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Page Score

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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	Yes	Yes	Yes	Yes

promotions				
Dispensing alcohol directly into the mouth	Yes	Yes	Yes	Yes
Mandatory provision of free tap water	Yes	Yes	Yes	Yes
Age verification policy	Yes	Yes	Yes	Yes
Mandatory provision of small measures	Yes	Yes	Yes	Yes

Score

0

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):

We believe that the mandatory licensing conditions which tackle irresponsible promotions in pubs and clubs have some effect but need to be extended. Anything which encourages people to drink more than they otherwise would should be included e.g. Offering alcoholic drinks cheaper than equivalent non alcoholic drinks e.g. vodka and orange cheaper than orange on it's own Student promotions - "drink the bar dry";, organised pub crawls Drinks sold in large containers to drink from e.g. 'goldfish bowls' Making units easier to understand - removing the 35ml spirits measure and giving total units at point of sale

Score

0

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):

Point of sale information should be made compulsory stipulating units of alcohol and the recommended limits together with health harms. Training for selling alcohol should be mandatory, particularly age verification training. This should be supported by till prompts for age verification and keeping a refusals book. Retailers should be required to provide and promote alternatives to excess alcohol consumption, including lower strengths beers and wines, small measures and soft drinks. Upselling of alcoholic products should be banned e.g. encouraging purchase of larger drinks or additional drinks.

Score

0

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, evidence shows that people often "pre-load";, drinking alcohol bought cheaply from the off trade before going out into the night time economy. Alcohol consumption at home also leads to "hidden harm"; due to links with domestic abuse, child protection and the longer term impact on health. There should be more focus on reducing irresponsible promotions, providing and promoting smaller measures, and applying other mandatory licensing conditions to the off-trade.

Score

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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

Score

0

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):

Alcohol related and alcohol specific (acute and chronic) hospital admissions, for both under and over 18s
Psychiatric admissions relating to alcohol
Incidence of liver disease, cancers relating to alcohol e.g. oesophagus and breast
Mortality data
Ambulance callouts
A&E data - including identifying hotspots for alcohol related violence
Identifying levels of alcohol related violence and domestic abuse through both health and police data.
Number of people in treatment for alcohol misuse
DAAT alcohol needs assessments
Child protection data
Resident surveys or other local data

Some of this data would be more meaningful at a local authority wide level due to the cumulative health impact, and it cannot always be tied to specific licensed premises.

Public Health is now core business for Local Authorities and should therefore play a central role in planning and economic development.

Public health should be a licensing objective in it's own right, not just tied to a CIP. Pro alcohol advertising far outweighs the impact of unit information promotion under the Responsibility Deal. Local research by

Balance, the NE Alcohol Office, shows that awareness of units is falling. It therefore would not be disproportionate to make public health a licensing objective.

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):

Some health data would be more meaningful on a Borough wide level than on a neighbourhood / ward level, as the cumulative impact on the whole area needs to be considered. What may seem relatively small impacts on a local level may add up to significant health related problems for the borough. Therefore a public health objective should be considered across the local authority area. This would also tie in to Local Authorities new obligations under public health.

Score

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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):

At the moment the cumulative impact policy is not used in Darlington. If it were to be utilised we believe that allowing consideration of data on alcohol-related health harms would be beneficial. It would allow Local Authorities to control the availability of alcohol in their areas, and take into account the full impact of alcohol related harm.

Page Score

0

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

Score

0

Page Score

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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.

No Response

Score

0

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	

Score

0

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, as widening the availability of alcohol would adversely impact on the licensing objectives. The World Health Organisation states that, '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 and, with less consistent evidence, road traffic accidents.'

Opening up more businesses as providers of alcohol would further normalise drinking alcohol, influencing young people and making them believe that alcohol is a central part of adult life. It would also reduce the power of local areas to restrict the availability of alcohol.

It would have a detrimental impact on already struggling front line services, as the increased availability of alcohol will increase harms to health and community safety.

There is also the risk that this would introduce loopholes for e.g. more petrol stations serving alcohol and "dial a drink" taxis receiving a licence.

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):

It is unclear what the legal definition of a "small part" or "small proportion" of sales would be. It increases the normalisation of alcohol, making it even more part of every day business which would be likely to increase consumption. The premises / licensed ancillary sales would need to be investigated to ensure they were still meeting the definition, which would be a burden on the diminishing resources of local authorities and / or police.

Score

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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.

No Response

Score

0

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:

Alcohol is an addictive drug. It needs to be appropriately licensed and sales managed. There would need to be restrictions in place to ensure alcohol was not being sold to children, that the businesses meet the licensing objectives and that adequate training would be provided. The legislation is too likely to lead to too many loopholes which can be exploited, while local authorities and police are too under-resourced to ensure that those acting as ancillary sellers are selling alcohol in a sensible manner. It also moves away from the aim of "Rebalancing the Licensing Act" which is intended to allow more local decisions to be made regarding the availability of alcohol. Oversight of these premises, ensuring for example that alcohol isn't being sold to under age children, will cost money yet more premises will be exempt from licensing fees. This will add more funding pressures to front line services already being affected by cuts.

Page Score

0

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.

No

Score

0

Q36. What impact do you think a locally determined notification would have on organisers of community events? Please select one option in each row.

No Response

Score

0

Page Score

0

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.

No

Score

0

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

No Response

Score

0

Page Score

0

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		X	
Determining that certain premises types are exempt in their local area		X	

Score

0

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

0

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).

According to the World Health Organisation, reducing the availability of alcohol is a key way to reduce related harms. Giving a nationally prescribed exemption to more premises will encourage the 24 hour drinking culture, as attempts to create a "cafe culture" don't appear to be working. Motorway service areas are unique in serving food in an area where alcohol is not available, no other premises meet that requirement.

Page Score

0

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.

No Response

Score

0

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

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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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.)

None

Page Score

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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			
Ancillary sales of alcohol		X	
Temporary event notices			
Late night refreshment			
Removing the duty to advertise licence applications in a local newspaper			
Sales of alcohol at motorway service stations			
Personal licences			

Score

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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).

Impact Assessment: A minimum Unit Price for Alcohol
p.10 We would like to see a comparison of MUP for different levels e.g. 45p and 50p and more justification of why 50p has not been chosen in line with Scotland

Impact Assessment: Health as an objective for cumulative impact

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 using 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. For example, recent research by Balance, the North East Alcohol Office, shows that awareness of units is decreasing. Money spent on advertising far outweighs money spent on promoting responsible drinking.

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, a risk highlighted on also highlighted in the document.

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, an expensive process for local authorities, especially given the current economic climate.

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.

Page Score

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Scoring Summary

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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