

UK HEALTHY CITIES NETWORK

'A consultation on delivering the Government's policies to cut alcohol fuelled crime and anti-social behaviour'

The following provides a collective response from the UK Healthy Cities Network

(It is important to point out that this is a collective response – whilst all Cities welcome the moves to tackle alcohol fuelled crime and anti-social behaviour not all Cities support Minimum unit pricing.)

Consultation Question 1:

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

Yes ✓	No	Don't Know
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If you think another level would be preferable, please set out your views on why this might be in the box below (keeping your views to a maximum of 200 words).

Evidence strongly suggests setting the minimum unit price level at 50p (at 2009 prices. It should be noted that due to inflation since the SchARR (University of Sheffield) model in 2009 (1), this figure is now equivalent to 54p we would support MUP at this level). This would achieve far better outcomes than the proposed 45p price level.

The SchARR model - the only UK independently peer reviewed evidence base for minimum unit pricing, found that, after 10 years a 50p price level would save:

- **3,060 lives**, 1,020 more than 45p level;
- **97,700 hospital admissions**, 31,500 more than 45p level;
- **442,300 days absent from work**, 176,000 more than 45p level;
- **42,500 crimes**, 18,400 more than 45p price level.

These are significant savings of lives, benefits for society and the economy and only cost the moderate drinker 6p per week more than a 45p minimum price level.

It should be noted all 24 DsPH across the North West of England support a MUP of at least 50p (2).

The previous Chief Medical Officer, The Faculty of Public Health and the Association of North East Councils and Leaders have all called for a 50p MUP of alcohol.

Consideration needs to be given to cross-border purchases and the impact on the North East if England and Scotland adopt different levels. A 50p level would be consistent with Scotland.

Consultation Question 2:

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

Yes ✓	No	Don't Know
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If yes, then please specify these in the box below (keeping your views to a maximum of 200 words).

- Pubs, bars and other on-trade premises will benefit from a MUP as it would reduce the differential in prices retailed in the off-trade and on-trade. Evidence suggests that this would result in a shift of drinking patterns to on-trade premises which is a safer, regulated environment to consume alcohol and positive for community pubs. This is important as CAMRA (3) reports that 16 pubs are closing every week.
- Inflation since the SchARR model was published in 2009 means that 50p is now valued at 54p we would support MUP at this level. MUP's success should be measured against revised levels when this policy is implemented.
- The Scottish Government is proposing a MUP of 50p creating a potentially serious cross border issues if the price level is 45p in the North East/West. This may encourage people to visit England to purchase and consume alcohol.
- The price level should be regularly revised to ensure that alcohol doesn't become more affordable.
- Additional money earned by retailers should be recouped by the Treasury and directed to local services which reduce alcohol harm.
- MUP should not be seen as a 'silver bullet' but as part of a package of measures, including training of bar staff, better enforcement of existing legislation, and community education.
- The modelling so far does not seem to have estimated the positive impact on under 18 drinkers where the influence of price can have the greatest impact and also the risk and consequential damage can be greater.
- There does not seem to be an estimation of the positive economic impact on on-trade premises. MUP has positive support from 70% of North East publicans who were surveyed.

Consultation Question 3:

How do you think the level of minimum unit price set by the Government should be adjusted over time?

Do nothing – the minimum unit price should not be adjusted.	
The minimum unit price should be automatically updated in line with inflation each year.	✓

N.B. As a minimum the MUP should be protected against inflation. However, the largest health benefit is achieved at a higher level than the proposed 45p/unit. We suggest starting at 55p minimum price per unit rising to 65p then 75p over a three year period in order to achieve the greatest health gain. This will allow time for the impact of the measure to be assessed and associated campaigns to be effective; therefore it should also be reviewed after a set period.

Consultation Question 4:

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?

Yes ✓	No	Don't Know
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If Yes please specify in the box below (keeping your views to a maximum of 100 words).

- Children and young people would be better protected from alcohol harms by reducing access to pocket-money priced alcohol.
- Alcohol would be de-normalised for children, to whom alcohol has become an everyday commodity.
- Drinkers and non-drinkers would benefit. Alcohol harm costs the North West more than £3billion/year (4).
- Frontline workers would benefit from less drunken violence (6).
- There would be a positive effect on offenders - 63% of male offenders are problem drinkers (7).
- We do not note any specific impact on under18 drinkers. We are aware of research carried out by Balance the North East Alcohol Office and Alcohol Concern "Drinking to get drunk" which shows how young people are particularly price sensitive. A North East focus group of 16 and 17 year olds agreed that for young people, price often dictated what and how much they drink.
- Severely dependent drinkers will not be able to afford alcohol and may go into withdrawal. Bristol street drinkers drink between 100 and 400 units/ w (exceptionally 700 unit/w). At 45p/unit that will cost them £45 - £180 (exceptionally £315). They will run out of dole money and alcohol in a couple of days, and then they could develop DT's, start fitting, etc. (risking brain damage and death). Primary care use, ED attendance and hospital admissions for emergency detoxes will increase. Street drinkers often choose alcohol over food, so we can expect an increase in malnutrition in the cohort as well.

Consultation Question 5:

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

Yes ✓	No	Don't Know
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Consultation Question 6:

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

Yes ✓	No	Don't Know
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If yes, please specify in the box below (keeping your views to a maximum of 100 words):

- As a general principle, the purchase of any goods should not be linked to the purchase of alcohol at a lower than normal sale price.
- Buying goods and getting alcohol discounted or free which would fall below a minimum unit price of 50p.
- There should be consistency of price per volume of a product regardless of the size or quantity of packaging that alcohol is sold in.
- Loyalty point schemes and money off coupons which are in anyway linked to alcohol.
- Alcohol is not a usual commodity; it is addictive and should not be treated like other food or drink items.
- Thought needs to be given to linked promotions such as purchasing alcohol at a lower price when accompanied with another product or as part of a meal deal.
- The legislation should provide (e.g. via provision for Orders in Council) for the ingenuity of the industry and retailers to invent ways of subverting its intentions.



Consultation Question 7:

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

Yes ✓	No	Don't Know
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If yes, please specify in the box below (keeping your views to a maximum of 200 words):

- There is a far greater impact of the multi-buy ban policy when enforced alongside a MUP of 50p (at 2009 prices) (1).
- Marketing of alcohol should be legislated for ensuring that it does not circumvent the spirit and intention of this legislation.
- An Alcohol Concern and Balance report of 16-24 year olds (8) found that promotions encouraged more drinking. A multi-buy ban would protect more children and young people.
- According to the World Health Organisation reducing population level consumption can be achieved by addressing affordability (alongside advertising and availability). Alcohol is addictive, it is not a usual commodity and it's thought to be one of the most dangerous drugs in the UK – yet it is sold for as little as 16p per unit in Newcastle.
- Multi-buy promotions encourage people to buy more alcohol than they intend resulting in easier access to alcohol in the home environment.
- Trading Standards needs a strengthened operation to monitor and enforce a multi-buy ban effectively as it is unlikely that relying on consumers policing the ban will be effective enough.
- In a report to Parliament (10), alcohol was named as the most dangerous drug in the UK. Unlike illegal drugs, it is easily accessible and costs as little as 12p/unit (11).
- Reduced consumption would improve health inequalities as lower income groups suffer greater health harms (12).
- In the same way that consumers are now shielded from open display of 'adult' magazines, alcohol should not be displayed alongside everyday groceries, but kept in an 'adults-only' section of larger stores, or behind the counter in smaller shops.

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 ✓	No	Don't Know
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If yes, please specify in the box below (keeping your views to a maximum of 100 words):

There should be a consistency in approach; therefore we would not want to differentiate between groups, however:

- Under 18's - as previously mentioned young people are particularly price sensitive and the cost of alcohol is shaping attitudes to alcohol consumption and behaviour.
- The on-trade, the night time economy, front line services and city centre residents. - A ban on multi buys would reduce home drinking which is an unregulated environment and level the playing field with the on trade.
- In Newcastle over 50% of people admit to 'preloading' at home before a night out and going out later which causes anti-social issues for residents and front line services in City Centres and the blame on the on-trade



Consultation Question 9:

Do you think each of the mandatory licensing conditions is effective in promoting the licensing objectives (crime prevention / public safety / public nuisance / prevention of harm to children)? Please state Yes / No / Don't know in each box:

		Prevention of crime and disorder	Public safety	Prevention of public nuisance	Protection of harm to children
A.	Irresponsible promotions	Yes	Yes	Yes	No
B.	Dispensing alcohol directly into the mouth	Yes	Yes	Yes	No
C.	Mandatory provision of free tap water N.B. But this is not routinely advertised and many pubs and bars charge for water.	Yes	Yes	Yes	No
D.	Age verification policy N.B. But this should be set at aged 25	Yes	Yes	Yes	Yes
E.	Mandatory provision of small measures	Yes	Yes	Yes	Yes

NB. We would recommend the addition of a fifth licensing objective of 'protection and promotion of public health' (as in Scotland).

Consultation Question 10:

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

Yes	No <input checked="" type="checkbox"/>	Don't Know
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If no, please specify in the box below (keeping your views to a maximum of 100 words):

There are many drinks promotions that encourage people to drink more and therefore could be classed as 'irresponsible'; however they do not fall into the current definition -

- Communal drinks vessels e.g. Goldfish Bowls
 - 3 trebles for £3.99
 - Pricing structures that make alcohol cheaper the more you buy.
 - Selling a mixer with alcohol cheaper than the soft drink on its own
 - Happy Hours, half price or 2 for 1
 - Pub crawls, student nights
 - Mobile sales e.g. shots girls selling alcohol or dispensing at the table.
- Drinks promotions which encourage a person to 'binge drink' i.e. have two times the Department of Health's low risk limits in one sitting should be discouraged.
 - Remove the 'need to demonstrate a link with crime and disorder' clause relating to irresponsible promotions as it is too restrictive.



- Licensees should train and re-train their staff to be accredited to a national standard for the safe and responsible retailing of alcohol.
- The unit content of all drinks should be clearly visible at the point of sale so customers know what they are drinking.

Consultation Question 11:

Are there other issues related to the licensing objectives (prevention of crime and disorder / public safety / prevention of public nuisance / protection of children from harm) which could be tackled through a mandatory licensing condition?

Yes ✓	No	Don't Know
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If yes, please specify in the box below (keeping your views to a maximum of 200 words):

- A proportionate seating and standing ratio should be dictated by the capacity of the premises.
- Soft drinks should be priced cheaper than the cheapest alcoholic drink to remove the incentive for people to drink alcoholic drinks.
- Beer should be decanted from bottles at the bar - removing bottles from the drinking environment will provide a safer space.
- A ban on irresponsible drinks promotions should be applied to the off-trade. Off trade should not sell alcohol between 10pm and 10 am. This would include home delivery.
- Ban Loyalty point schemes for the purchase of alcohol which encourages increased consumption.
- Offering shots of spirits away from the bar area (e.g. table to table selling of shots of pre-poured vodka) should be banned.
- Happy hours should be banned as they sell discounted alcohol.
- Organised commercial pub crawls should be banned as they encourage the consumption of excess alcohol which leads to drunkenness and anti-social behaviour (14).
- Ban Ladies nights, (where there are discounted or free drinks) as they encourage excessive consumption of alcohol.
- Drinking games should be banned.
- Till prompts to prevent underage sales and serving alcohol to adults who are drunk.
- Make the licensee responsible for the activities of third party promoters on their premises.
- Alcohol should be in a separate part of the off-trade from other goods to reduce the use of product placement, for instance putting alcohol at the entrance to supermarkets can increase the amount sold.

Consultation Question 12:

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

Yes	No ✓	Don't Know
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If no, please specify in the box below (keeping your views to a maximum of 100 words):

There should be as many or as few mandatory licensing conditions as deemed appropriate by the Government. This should include extending the ban on irresponsible drinks promotions to cover off-trade.

Supermarket alcohol sales now account for 70% of off-trade sales (15, 16) and can sell alcohol at discounted prices. Stopping irresponsible promotions would also help to tackle pre-loading and binge drinking of alcohol purchased from the off-trade.

More mandatory conditions to target off-licences such as:



- Refusals register
- Till prompts
- Compulsory use of CCTV
- Ensuring that alcohol is kept to one part of the shop and not on display in the entrance e.g. shop within a shop.
- Not advertising alcohol on external windows.
- Mandatory training of all staff and not just DPS's.
- Off trade should not sell alcohol between 10pm and 10 am. This would include home delivery.

Consultation Question 13:

What sources of evidence on alcohol-related health harm could be used to support the introduction of a cumulative impact policy (CIP) if it were possible for a CIP to include consideration of health?

Please specify in the box below, keeping your views to a maximum of 200 words.

A robust Joint Strategic Needs Assessment would provide consistency in approach; we recommend that it would include:

- Accident and Emergency data
- Ambulance data
- Paramedic data
- GP data
- Urgent care/walk in centre data
- Treatment data including specialist treatment
- Demand/unmet demand for alcohol treatment
- Alcohol related mortality (including suicides and self-harm)
- Mental health and wellbeing indices
- Foetal Alcohol Spectrum Disorders data
- CEM Home Office monitoring data on violence
- Trauma and Injury Intelligence Group data from the North West Public Health Observatory
- Other hospital admissions data NI39 e.g. specific (drunkenness) and nonspecific (cancers)
- Map out premises and correlate alcohol related admissions
- Domestic abuse data including child protection issues

Public health should be a licensing objective in its own right and not tied to CIPs. This would not be disproportionate as suggested in the impact assessment, and would play a role in the economic development and health of an authority area. Experience from Scotland suggests that public health should be taken into consideration across the whole authority area rather than at smaller scale when assessing the over-provision of alcohol to take into account all points of sale.

Consultation Question 14:

Do you think any aspects of the current cumulative impact policy process would need to be amended to allow consideration of data on alcohol-related health harms? (Please select one option):

Yes ✓	No	Don't Know
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If yes, please specify in the box below (keeping your views to a maximum of 200 words).



If Public Health is to contribute to the evidential base for setting up a Cumulative Impact Areas then this must go into primary legislation not regulation. This is because at appeal the magistrate may just rely on the 4 licensing objectives in primary law.

Currently only the police can object to licence applications due to a Cumulative Impact Policies (CIP). We believe that all responsible authorities should be able to object to the application therefore widening the process to consider health data and the impact on health harms. For example if there is a health harm issue but no crime issue, health bodies may object on the grounds of a CIP. As noted in question 13, public health and assessment of over-provision of alcohol should be considered across the authority area as consideration at ward level could be insufficient and not take into account sales from neighbouring wards.

There should be reference in the guidance on how health data is shared and/or published in the public domain to recognise the Caldicott principles which govern patient identifiable information.

Health data is often used to project trends in various health conditions and mortality rates. It should be possible to allow the inclusion of this information in submissions

Consultation Question 15:

What impact do you think allowing consideration of data on alcohol-related health harms when introducing a cumulative impact policy would have if it were used in your local area?

Please specify in the box below, keeping your views to a maximum of 200 words. Please provide evidence to support your response.

- We welcome the introduction of health as a licensing objective but would prefer that it was not limited to cumulative impact policies only. By restricting it to CIP only, it is not giving health an equal value to the other licencing objectives and it is not recognising the adverse impact of alcohol.
- Health data allows you to consider the chronic and long term harms caused by alcohol rather than the acute impact of alcohol such as assaults, crime and disorder and public nuisance.
- In addition to the impact on controlling alcohol related crime the health data can impact upon all policy areas and licensing objectives giving stronger evidence and improving the all-round data picture to set a baseline and allow for more informed decision making, e.g. alcohol related assaults reporting to A&E but not to the police.
- Including health data in consideration of a CIP would enable local links between alcohol and health harm to be better established.
- There will be a positive impact on people's mental health and wellbeing because there is less violence, improving healthiness of the population, increased life expectancy and increased economic productivity.
- Where there is a saturation of licensed premises, for example in a city centre, competition drives down the price of alcohol which encourages additional consumption. An authority wide over-provision policy backed by public health would lessen 'competition by price' and so limit availability of alcohol to young people, which is an indicator of harm (17).
- The World Health Organisation (18) has reported that availability effects levels of harm therefore Licensing Authorities should be able to control the availability of alcohol.



Consultation Question 16:

Should special provision to reduce the burdens on ancillary sellers be limited to specific types of business, and/or be available to all types of business providing they meet certain qualification criteria for limited or incidental sales? (Please select one option in each row):

		Yes	No	Don't know
A.	The provision should be limited to a specific list of certain types of business and the kinds of sales they make.		No	
B.	The provision should be to all businesses providing they meet certain criteria to be an ancillary seller.		No	
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.		No	

Consultation Question 17:

If special provision to reduce licensing burdens on ancillary sellers were to include a list of certain types of premises, do you think it should apply to the following? (Please select one option in each row):

		Yes	No	Don't Know
A.	Accommodation providers, providing alcohol alongside accommodation as part of the contract.		No	
B.	Hair and beauty salons providing alcohol alongside a hair or beauty treatment.		No	
C.	Florists, providing alongside the purchase of flowers.		No	
D.	Cultural organisations, such as theatres, cinemas and museums, providing alcohol alongside cultural events as part of entry ticket.		No	
E.	Regular charitable events providing alcohol as part of the wider occasion.		No	

Consultation Question 18:

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

(Please write your suggestions in the box below, keeping your views to a maximum of 200 words):

In principle, we disagree with the 'need to free up business' in relation to alcohol. It should not be treated as an everyday, ordinary product (19).

- Any sale of alcohol should be regulated there are no types of premises for alcohol sales which should be unregulated. Unregulated alcohol sales would create a situation where the objectives of the Licensing Act 2003 would be unenforceable.
- The licensed sale of alcohol also protects and ensures a standard of 'due diligence' is adhered to by people selling alcohol.



- This proposal would create a third tier of licensed premises as it would create a category outside Early Morning Restriction Orders/Late Night Levy and CIPs. This would create confusion for consumers and enforcement officers and lead to increased costs for public sector organisations dealing with the harmful effects of alcohol.
- This extra category of licensed premises could be contributing to the harm of excessive alcohol consumption but would not contribute to the costs, for example through a Late Night Levy being applied to licensed premises.
- As previously mentioned, the availability, affordability and the advertising of alcohol has led to increased alcohol consumption and it will take interventions across all of these areas to reduce alcohol consumption. Whilst we support the reduction of burden on business this should not be at the expense of increasing overall availability of alcohol.
- We are also concerned that as we have learned from experience, this could lead to loopholes that could be exploited.
- Do not allow any special provision. There is a plethora of ancillary sellers already and it is totally inappropriate.
- The problem with relaxing the rules for (e.g.) hair salons, cinemas, charities etc., is that it provides loopholes for imaginative exploitation.

Consultation Question 19:

The aim of a new ‘ancillary seller’ status is to reduce burdens on businesses where the sale of alcohol is only a small part of their business and occurs alongside the provision of a wider product or service, while minimising loopholes for irresponsible businesses and maintaining the effectiveness of enforcement (see paragraphs 9.2 and 9.3).

Do you think that the qualification criteria proposed in paragraph 9.6 meet this aim? (Please select one option):

Yes	No ✓	Don't Know
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If no, please specify in the box below (keeping your views to a maximum of 200 words).

- We don't agree with the ‘ancillary seller’ status because there is no mechanism to police these businesses, and ensure that they retail alcohol responsibly.
- We would like to reiterate that by reducing the regulation on the supply of alcohol for some business, it will increase available and further normalise alcohol in our society.
- The scheme would also take the sale of alcohol out of the remit of the four objectives of the Licensing Act 2003 and the proposed objective of ‘Public Health’ thus undermining the Licensing Act.
- The ‘ancillary sellers’ of alcohol in the retail environment would not come under the same protection afforded by the Licensing Act or necessarily receive appropriate training therefore creating a three tier system which cannot be monitored, supported or enforced.
- In addition people purchasing from an ‘ancillary seller’ need to understand they are purchasing from an unregulated ‘ancillary seller’ and are therefore not necessarily making a reputable or safe purchase, for example safeguarding underage sales.



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 licence application that the requirement for a personal licence holder be removed.			Don't Know
B.	Introduce a new, light-touch form of authorisation for premises making ancillary sales - an 'ASN' but retain the need for a personal licence holder.			Don't Know
C.	Introduce a new, light touch form of authorisation for premises making ancillary sales – an ASN - with no requirement for a personal licence holder.			Don't Know

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 premises making ancillary sales to request in their premises licence application that the requirement for a personal licence holder be removed.	Yes		
B.	Introduce a new, light-touch form of authorisation for premises making ancillary sales an - 'ASN' but retain the need for a personal licence holder.	Yes		
C.	Introduce a new, light-touch form of authorisation for premises making ancillary sales - an ASN - with no requirement for a personal licence holder.	Yes		

Consultation Question 22:

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

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

We do not agree with any deregulation or unregulated sales of alcohol. The consumption of alcohol should be de-normalised in our society. This can be achieved through proper regulation which would help to reduce consumption with resulting benefits to the health and wellbeing of society.

Again, alcohol is not a usual commodity, it is addictive so the supply of alcohol should bring with it responsibility and accountability.

Whilst the process proposed would be quicker and cheaper for business, it is contrary to the vision to empower local people and is providing no opportunity for local people to have a say about what is



happening in their area and for elected members to represent their communities. Local Authorities and the Police will be left with the cost of dealing with complaints afterwards.

The problem with allowing ancillary seller status is that it will:

- Further 'normalise' the consumption of alcohol as ancillary to a host of commercial transactions.
- Be corrupted as a loophole by people who want to sell alcohol in an irresponsible way.
- Will greatly increase the burden on enforcement.

Consultation Question 23:

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?

Yes	No ✓	Don't Know
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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.			Don't Know
B.	Increase the burden.			Don't Know

Consultation Question 25:

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

Yes	No ✓	Don't Know
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Consultation Question 26:

If yes, please indicate which option you would prefer:

15	N/A
18	N/A
Don't know	N/A

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.		No	



B.	Determining that certain premises types are exempt in their local area.		No	
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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 service areas should receive a nationally prescribed exemption from regulations for the provision of late night refreshment.		No	

Consultation Question 29:

Please describe any other types of premises to which you think a nationally prescribed exemption should apply (keeping your views to a maximum of 100 words):

Accommodation - if you are serving to a guest of a patron and premises that are just serving hot food and hot drinks (non-alcoholic).

Consultation Question 30:

Do you agree with each of the following proposals?:

		Yes	No	Don't Know
A.	Remove requirements to advertise licensing application in local newspapers.		No	
B.	Remove the centrally imposed prohibition on the sale of alcohol at MSAs for the on and off-trade.		No	
C.	Remove the centrally imposed prohibition on the sale of alcohol at MSAs but only in respect of overnight accommodation – "lodges".		No	
D.	Remove or simplify requirements to renew personal licences under the 2003 Act.		No	

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 requirements to advertise licensing application in local newspapers.			Don't Know
B.	Remove the centrally imposed prohibition on the sale of alcohol at MSAs for the on and off-trade.		No	
C.	Remove the centrally imposed prohibition on the sale of alcohol at MSAs but only in respect of overnight accommodation – "lodges".		No	
D.	Remove or simplify requirements to renew personal licences under the 2003 Act.			Don't Know



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 requirements to advertise licensing application in local newspapers.		No	
B.	Remove the centrally imposed prohibition on the sale of alcohol at MSAs for the on and off-trade.		Yes	
C.	Remove the centrally imposed prohibition on the sale of alcohol at MSAs but only in respect of overnight accommodation – “lodges”.		Yes	
D.	Remove or simplify requirements to renew personal licences under the 2003 Act.		Yes	

Consultation Question 33:

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

(Please specify in the box below keeping your views to a maximum of 200 words):

There are no processes that could be removed or simplified without having an adverse effect on the licensing objectives or increasing the burden on responsible authorities or the local community.

- One of our member cities feels that -
- Alcohol should not be sold in motorway service areas at all.
- Alcohol should not be sold on trains at all.

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.		No	
B.	Multi-buy promotions.			Don't know
C.	Health as a licensing objective for cumulative impact.			Don't know
D.	Ancillary sales of alcohol.			Don't know
E.	Temporary Events Notices.			Don't know
F.	Late night refreshment.			Don't know
G.	Removing the duty to advertise license applications in a local newspaper.			Don't know
H.	Sales of alcohol at motorway service stations.			Don't know



I.	Personal licenses.			Don't know
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Consultation Question 35:

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

Yes	✓	No	Don't Know
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If yes, please specify in the box below, referencing clearly the impact assessment and page to which you refer (keeping your views to a maximum of 400 words).

We do not think that the IA accurately estimates the costs to public sector to communicate changes arising from MUP, banning multi-buys or mandatory conditions. Also the impact assessments have underestimated the need for training, monitoring and enforcement to ensure compliance. For example people regularly underestimate their own alcohol consumption when self-reporting. Also from work with partners in the North East we have found that the costs associated with alcohol related crime and anti-social behaviour are probably underestimated as whilst there has been progress, the 'alcohol' marker is still under recorded.

The IA for MUP for alcohol misses out the effect on severely dependent drinkers, and the resulting effect on specialist substance misuse services, primary and secondary care. Page 4 paragraph A2. See response to Question 4

MUP- Our experience with 'Smoke Free' legislation showed that whilst the larger retailers were more prepared, the small independent retailers needed more support to understand and comply, particularly as alcohol products are not consistently or accurately marked with the number of units.

We also do not think that all retailers will automatically comply from the outset as suggested in the assessment so monitoring as well as enforcement will be essential.

In order for MUP and the banning of multi buys to operate effectively it may be necessary to train some retailers, and elected Members on the Licensing Committee will also need familiarizing with the legislation. In addition to this front line enforcement officers, the police, trading standards officers as well as licensing officers will all need to be familiar with the legislation, in order to identify non-compliance.

£500 per local authority for communication, 0.5-1 hour for one officer to familiarize themselves and £2500 for enforcement therefore does not accurately reflect the true costs.

Health as a licensing objective - Page 12 - We would recommend the addition of a fifth licensing objective of 'protection and promotion of public health' (as in Scotland).

The impact assessment assumes that health will already have information readily available to introduce a CIP as part of the Joint Strategic Needs Assessment and development of health and wellbeing strategies. This is assuming that all JSNA and strategies have prioritized alcohol in the same way, and that that they have all analysed data at neighbourhood level. In view of the fact that the strategies are supposed to be high level priorities it is unlikely they will go into this much detail. Also as JSNA's are not refreshed annually it is unlikely that all areas will have carried out a deep dive of alcohol data at a neighbourhood level and have the latest information without the need for extra analysis.



These costs have not been quantified.

Ancillary sales - We are concerned that the potential benefits to business are insufficient to run the risk of increased alcohol-related harms and the role that local people should have to get involved in decision making in their area.

