

## **A Consultation On Delivering The Government's Policies To Cut Alcohol Fuelled Crime And Anti-Social Behaviour**

### **Summary**

1. This consultation puts forward proposals and questions on five key areas set out in the Government's Alcohol Strategy ('the Strategy'), published on 23 March 2012:
  - the price level and mechanisms for a minimum unit price for alcohol;
  - introducing a ban on multi-buy promotions in the off-trade (see glossary);
  - reviewing the mandatory licensing conditions;
  - introducing health as a licensing objective for cumulative impact; and
  - reducing the burden of regulation on responsible businesses.
2. In the Strategy, the Government committed to introducing a minimum unit price. However, in other areas, this consultation seeks views on the introduction of policies. Respondents are asked about introducing a ban on multi-buy promotions in the off-trade (that is premises that are only authorised to sell alcohol for consumption off the premises, such as shops and off-licences) and the introduction of health as a licensing objective for cumulative impact policies. This consultation also forms part of the review of the mandatory licensing conditions (sometimes called the Mandatory Code) in relation to the sale of alcohol. It also asks about a number of proposals to reduce burdens on responsible business and support local growth.
3. Full details of the consultation and its related impact assessments can be found at <http://www.homeoffice.gov.uk/publications/about-us/consultations/alcohol-consultation/> and it is due to close on 6 February 2013.

### **Recommendation**

1. That a full response be drafted to the consultation, to be submitted with the Chair's approval, before the closure of the consultation period. Partners are requested to submit any comments to David Kitching at [dave.kitching@stockton.gov.uk](mailto:dave.kitching@stockton.gov.uk) before 25 January 2013 who will prepare the draft response taking on board any comments received.

The Partnership's response should be based on the following principles:-

- (a) continuing support for the principle of Minimum Unit Pricing (MUP)
- (b) a preference for MUP at the level of 50p per unit of alcohol
- (c) support for a ban on multi-buy promotions
- (d) support for including the promotion of public health as a licensing objective for the purpose of all decisions on alcohol licensing (and not only for cumulative impact policies)
- (e) a cautious approach to the proposed liberalisation of ancillary sales of alcohol
- (f) a cautious approach to the proposed liberalisation of the scope of Temporary Event Notices (TENs), taking into account the potential impact on neighbours
- (g) a proposal that the Government should undertake a fiscal assessment of the impact of introducing Minimum Unit Pricing (MUP), weighing the increased VAT return against the reduced sales, and any surplus generated should be passported to local authorities for investment in enforcement of MUP and improvement in community-based alcohol treatment

- (h) the need for the Government to identify in far more detail what enforcement responsibilities and options will be created in respect of MUP, and the desirability of creating offences of both selling alcohol at below MUP and permitting alcohol to be sold at below MUP.

## Detail

1. In 2010, £42.1 billion was spent on alcohol in England and Wales alone i.e. about £700 per head of population, or nearly £1,000 per adult. Alcohol has been so heavily discounted that it is now possible to buy a can of lager for as little as 20p or two litres bottle of cider for £1.69. Behaviour has also changed, with increasing numbers of people drinking excessively at home, including many who 'pre-load' before going on a night out. There has been a 45% increase in purchasing alcoholic drinks for consumption in the home, from 527ml per person per week in 1992, to 762ml in 2010.
2. There is extensive and consistent evidence that increasing the price of alcohol reduces consumption, leading to reductions in alcohol-related harms particularly around health. For instance, recent analysis of the effectiveness of 'social reference pricing' in a Canadian province found that a 10% increase in the minimum price of any given alcoholic product reduced its consumption by between 14.6% and 16.1%. This supports the Government's intentions, as set out in the Strategy, to end the availability of the most irresponsibly priced alcohol, by introducing a minimum unit price, and to consult on the introduction of a ban of multi-buy promotions in the off-trade.

## Minimum Unit Pricing

3. The consultation states that the Government want to ensure that the chosen 45p minimum unit price (MUP) level is targeted and proportionate, whilst achieving a significant reduction of harm. The consultation asks questions in relation to three areas:

1. The price level
2. The mechanism for adjusting the price over time; and
3. The impact of a minimum unit price.

At its meeting of 21 December 2010 the Partnership "AGREED that members of the Partnership support a local policy [i.e. on Minimum Unit Pricing for Alcohol] providing that all other local authorities in the area were in agreement, and would also support a national policy".

4. There is extensive and consistent evidence that increasing the price of alcohol reduces consumption – but the actual impact of minimum unit pricing will depend on the price per unit of alcohol - the previous Chief Medical Officer called for a 50p MUP of alcohol in 2008 which at today's value would be around 54p. Further, consideration needs to be given to cross-border purchases if a minimum unit price below that proposed for Scotland (50p) is set. Regionally there is a great deal of support for a 50p MUP. Some illustrations are shown at Appendix B. It should be noted that it is extremely unlikely that MUP will have any effect at all on 'on sales'.
5. The purpose of minimum unit pricing is to reduce excessive alcohol consumption, by linking the price of alcohol to its strength. It is designed to increase the price of the cheapest and strongest alcohol. This will protect vulnerable younger and heavier drinkers who are more likely to drink cheap alcohol – The findings from a recent Alcohol Concern and Balance study with over a 1000 young people and adults (16-24) suggested that the cost of alcohol may be shaping attitudes and behaviour around excessive consumption.
6. The University of Sheffield has modelled the effects of minimum unit pricing on a number of parameters. The Home Office, however, have revised the model estimates to take into

account inflationary changes since the model was produced in 2009. These revised figures are not set out in the consultation document therefore direct comparisons between 45p and 50p are not presently available. Detailed below, for illustrative purposes, is information taken from the published updated Sheffield Model:

#### **Data from revised Sheffield Study (2009)**

National figures (estimated Stockton figures based on 0.3% of national totals, in brackets)

|                                       | 45p               | 50p               |
|---------------------------------------|-------------------|-------------------|
| Consumption:                          | 4.3%              | 6.7%              |
| Additional cost per drinker per week. | £34.89 (67 pence) | £43.17 (83 pence) |
| Reduction in Deaths:                  | 2,040 (6)         | 3,060 (9)         |
| Reduction in Hospital admissions:     | 66,200 (197)      | 97,700 (293)      |
| Reduction in Total crimes:            | 24,100 (72)       | 42,500 (129)      |
| Reduction in Absence days:            | 266,300 (797)     | 442,300 (1,327)   |
| Reduction in Unemployed people:       | 18,100 (54)       | 25,900 (78)       |

#### **Multi Buy Promotions In The Off Trade**

7. The Government is concerned that these promotions contribute to the availability of irresponsibly priced alcohol, particularly through promotions which encourage large volumes of alcohol to be purchased. 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. The consultation asks questions in relation to two areas:

1. Whether to introduce a ban on multi-buy promotions? and
2. The impact of such a ban.

8. There is support for a ban on multi-buy promotions involving alcohol in the off-trade which should also include deals which are linked to discounting individual items. Cheap alcohol deals and the price differential between on- and off-trade may result in people drinking more than intended, particularly young people as highlighted recently by Alcohol Concern and Balance Research. However, the current evidence is inconclusive regarding the impact of multi-buy bans, and suggests such restrictions are most effective if introduced alongside wider pricing interventions to curb irresponsible practices that encourage excessive drinking. Scotland introduced a ban on multi buy promotions in the off-trade in October 2011 - research findings will be made available by the end this calendar year.

#### **Reviewing The Mandatory Licensing Conditions**

9. 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 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. Views are, therefore, sought on three areas:

1. The current set of mandatory licensing conditions;
2. Whether the current set of mandatory licensing conditions sufficiently targets problems such as irresponsible promotions in pubs and clubs; and
3. The application of the conditions to the on- and off-trade.

10. Initial views are that no conditions should be removed from the mandatory licensing codes.

## **Health As A Licensing Objective For Cumulative Impact Policies (CIP)**

11. The Government 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 – the consultation seeks views on two areas:
  1. Introducing health as a licensing objective for cumulative impact policies;  
and
  2. The impact of such a licensing objective for cumulative impact policies.
  
12. The proposal that alcohol-related health harms be taken into account is welcome, however this should not be restricted only to CIP's. Here in Stockton where we do not currently have a CIP health concerns would still not be able to taken into account under the current proposals, and it is suggested that the provision of public health should be included as a fifth licensing objective for all decisions on alcohol licensing, not just those on CIP.

## **Freeing Up Responsible Businesses**

13. The Government has committed to consult on giving licensing authorities greater freedom to take decisions that reflect the needs of their local community and seeks views on two areas:
  1. Proposals to develop a more targeted, proportionate and flexible licensing regime that can support responsible growth while maintaining the integrity of the licensing system; and
  2. The impact of these proposals on businesses and on the licensing objectives.
  
14. There are several areas in this section that are a cause of concern in terms of further normalising alcohol as an everyday “commodity”, i.e. the prospect of special provisions being granted that would allow alcohol to be sold alongside hair or beauty treatments, or alongside the purchase of flowers. Initial views are that we should not be introducing any measures that will lead to an increase in alcohol consumption or that seek to further promote the normalisation of alcohol.

## **Consultation Questions And Responses**

15. The Government has posed a number of questions and sought views about certain proposals as part of the consultation process. Appendix A contains details of those questions and the responses requested. Partners are requested to submit any comments to David Kitching at [dave.kitching@stockton.gov.uk](mailto:dave.kitching@stockton.gov.uk) before 25 January 2013 who will prepare the draft response taking on board any comments received.

David Kitching  
Trading Standards & Licensing Manager

Telephone: (01642) 526530  
E-Mail: [dave.kitching@stockton.gov.uk](mailto:dave.kitching@stockton.gov.uk)

## Appendix A



Mike Batty  
Head of Community Protection  
Development & Neighbourhood Services  
PO Box 232  
16 Church Road  
Stockton-on-Tees  
TS181XD

Tel: (01642) 527074  
Fax: (01642) 526583  
e-mail: [mike.batty@stockton.gov.uk](mailto:mike.batty@stockton.gov.uk)

Dear Sir

### **A Consultation On Delivering The Government's Policies To Cut Alcohol Fuelled Crime And Anti-Social Behaviour**

The Safer Stockton Partnership (SSP) is a thematic arm of Stockton Renaissance which deals with crime, anti-social behaviour and substance misuse related crime and anti-social behaviour. The partnership is made up of the following members:

- Catalyst
- Cleveland Fire Authority
- Cleveland Police
- Cleveland Police Authority (to be replaced by Police and Crime Commissioners in 2012)
- Drugs and Alcohol Action Team
- Durham Tees Valley Probation Trust
- H M Prison Holme House
- the four Local Area Partnership Boards
- Neighbourhood Watch
- Safe in Tees Valley
- Stockton Adult Protection Committee
- Stockton-on-Tees Borough Council
- Stockton Primary Care Trust (to be replaced by GP commissioning consortia in 2013)
- Stockton Youth Offending Service
- Tristar Homes Ltd
- University of Durham Queen's Campus
- the Vela Group
- Victim Support

The comments in this response to the above mentioned consultation are made on behalf of all of the partners.

Alcohol Consultation,  
Drugs and Alcohol Unit,  
Home Office,  
4th Floor Fry Building,  
2 Marsham Street,  
London,  
SW1P4DF

I hope that you find our response to the consultation of benefit. Please feel free to contact me if you require any further information.

Yours faithfully

Mike Batty  
Head of Community Protection

## Consultation Response – Safer Stockton Partnership

The Government wants to ensure that the chosen minimum unit price level is targeted and proportionate, whilst achieving a significant reduction of harm

|  |    |            |
|--|----|------------|
| <p>Consultation Question 1:<br/>Do you agree that this MUP level would achieve these aims? (Please select one option)</p>  |    |            |
| Yes  | No | Don't know |
| <p>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)</p> |    |            |
|  |    |            |

|  |    |            |
|--|----|------------|
| <p>Consultation Question 2:<br/>Should other factors or evidence be considered when setting a minimum unit price for alcohol? (Please select one option)</p> |    |            |
| Yes  | No | Don't know |
| <p>If yes please specify in the box below (keeping your views to a maximum of 200 words)</p>   |    |            |
|  |    |            |

|   |  |
|---|--|
| <p>Consultation Question 3:<br/>How do you think the level of minimum unit price set by the Government should be adjusted over time? (Please select one option)</p> |  |
| Do nothing – the minimum unit price should not be adjusted  |  |
| The minimum unit price should be automatically be updated in line with inflation each year  |  |
| The minimum unit price should be reviewed after a set period  |  |
| Don't know  |  |

|  |    |            |
|--|----|------------|
| <p>Consultation Question 4:<br/>         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?<br/>         (Please select one option)</p> |    |            |
| Yes  | No | Don't know |
| <p>If Yes please specify in the box below (keeping your views to a maximum of 100 words)</p>   |    |            |

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

|  |    |            |
|--|----|------------|
| <p>Consultation Question 6:<br/>         Are there any further offers which should be included in a ban on multi-buy promotions?<br/>         (Please select one option)</p> |    |            |
| Yes  | No | Don't know |
| <p>If Yes please specify in the box below (keeping your views to a maximum of 100 words)</p>   |    |            |

|   |    |            |
|---|----|------------|
| <p>Consultation Question 7:<br/>         Should other factors or evidence be considered when considering a ban on multi-buy promotions?<br/>         (Please select one option)</p> |    |            |
| Yes   | No | Don't know |
| <p>If Yes please specify in the box below (keeping your views to a maximum of 200 words)</p>  |    |            |



**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?  
 (Please select one option)

|     |    |            |
|-----|----|------------|
| Yes | No | Don't know |
|-----|----|------------|

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

**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                   |                                  |               |                               |                                |
| B | Dispensing alcohol directly into the mouth |                                  |               |                               |                                |
| C | Mandatory provision of free tap water      |                                  |               |                               |                                |
| D | Age verification policy                    |                                  |               |                               |                                |
| E | Mandatory provision of small measures      |                                  |               |                               |                                |

**Consultation Question 10:**  
 Do you think that the mandatory licensing conditions do enough to target irresponsible promotions in pubs and clubs?  
 (Please select one option)

|     |    |            |
|-----|----|------------|
| Yes | No | Don't know |
|-----|----|------------|

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

|  |    |            |
|--|----|------------|
| <p>Consultation Question 11:<br/>         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?<br/>         (Please select one option)</p> |    |            |
| Yes  | No | Don't know |
| <p>If Yes please specify in the box below (keeping your views to a maximum of 200 words)</p>   |    |            |
|  |    |            |

|   |    |            |
|---|----|------------|
| <p>Consultation Question 12:<br/>         Do you think the current approach, with five mandatory licensing conditions applying to the on-trade and only one of those to the off-trade, is appropriate? (Please select one option)</p> |    |            |
| Yes   | No | Don't know |
| <p>If no please explain why you think the current approach is not the best approach in the box below (keeping your views to a maximum of 100 words)</p>   |    |            |
|   |    |            |

|   |  |  |
|---|--|--|
| <p>Consultation Question 13:<br/>         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?<br/>         Please specify in the box below (keeping your views to a maximum of 200 words)</p> |  |  |
|   |  |  |

|   |    |            |
|---|----|------------|
| <p>Consultation Question 14:<br/>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)</p> |    |            |
| Yes   | No | Don't know |
| <p>If yes please specify which aspects in the box below (keeping your views to a maximum of 200 words)</p>  |    |            |
|   |    |            |

|  |
|--|
| <p>Consultation Question 15:<br/>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.</p> |
|  |

|   |   |     |    |            |
|---|---|-----|----|------------|
| <p>Consultation Question 16:<br/>Should special provision to reduce the burdens on ancillary sellers be limited to specific types of business, and/or be available to all types of business providing they met key criteria for limited or incidental sales? (Please select one option in each row)</p> |   |     |    |            |
|   |   | 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  |     |    |            |
| B   | The provision should be available to all businesses providing they meet certain qualification criteria to be an ancillary seller  |     |    |            |
| 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 |     |    |            |

| Consultation Question 17:<br>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  |     |    |            |
| B   | Hair and beauty salons providing alcohol alongside a hair or beauty treatment   |     |    |            |
| 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 |     |    |            |
| D   | Florists providing alcohol alongside the purchase of flowers  |     |    |            |
| E   | Regular charitable events providing alcohol as part of the wider occasion   |     |    |            |

| Consultation Question 18:<br>Do you have any suggestions for other types of businesses to which such special provision could apply without impacting adversely on one or more of the licensing objectives? Please write your suggestion in the box below, keeping your views to a maximum of 200 words) |
|---|
|   |

| Consultation Question 19:<br>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) |     |            |            |
|---|-----|------------|------------|
| <table border="1" style="width: 100%;"> <tr> <td style="width: 33%;">Yes</td> <td style="width: 33%;">No</td> <td style="width: 33%;">Don't know</td> </tr> </table>  | Yes | No         | Don't know |
| Yes   | No  | Don't know |            |
| If no please describe the changes you would make in the box below (keeping your views to a maximum of 200 words)  |     |            |            |
|   |     |            |            |

| Consultation Question 20:<br>Do you think that these proposals would significantly reduce the burdens on ancillary sellers?(Please select one option in each row) |  |     |    |            |
|---|--|-----|----|------------|
|   |  | Yes | No | Don't know |
| A   | Allow premises making ancillary sales to request in their premises licence application that the requirement for a personal licence holder be removed   |     |    |            |
| 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     |     |    |            |
| C   | Introduce a new light touch form of authorisation for premises making ancillary sales – an 'ASN' but with no requirement for a personal licence holder |     |    |            |

| Consultation Question 21:<br>Do you think that the following proposals would impact adversely on one or more of the licensing objectives? (Please select one option in each row) |  |     |    |            |
|--|--|-----|----|------------|
|  |  | Yes | No | Don't know |
| A  | Allow premises making ancillary sales to request in their premises licence application that the requirement for a personal licence holder be removed   |     |    |            |
| 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     |     |    |            |
| C  | Introduce a new light touch form of authorisation for premises making ancillary sales – an 'ASN' but with no requirement for a personal licence holder |     |    |            |

| Consultation Question 22:<br>What other issues or options do you think should be considered when taking forward proposals for a lighter touch authorisation? (please specify in the box below keeping your views to a maximum of 200 words) |
|---|
|   |

|   |    |            |
|---|----|------------|
| <p>Consultation Question 23:<br/>Do you agree that licensing authorities should have the power to allow organisers of community events involving licensable activities to notify them through a locally determined notification process? (Please select one option)</p> |    |            |
| Yes   | No | Don't know |

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

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

|  |  |
|--|--|
| <p>Consultation Question 25:<br/>Should the number of TENs which can be given in respect of individual premises be increased? (Please select one option)</p> |  |
| 15   |  |
| 18   |  |
| Don't know   |  |

|   |   |     |    |            |
|---|---|-----|----|------------|
| <p>Consultation Question 27:<br/>Do you think that licensing authorities should have local discretion around late night refreshment in each of the following ways? (Please select one option in each row)</p> |   |     |    |            |
|   |   | Yes | No | Don't know |
| A   | Determining that premises in certain areas are exempt         |     |    |            |
| B   | Determining that certain areas are exempt in their local area |     |    |            |

|   |   |     |    |            |
|---|---|-----|----|------------|
| <p>Consultation Question 28:<br/>Do you agree that motorway service areas should receive a nationally prescribed exemption from regulations for the provision of late night refreshment? (Please select one option)</p> |   |     |    |            |
|   |   | Yes | No | Don't know |
| A   | Motorway services should receive a nationally prescribed exemption from regulations for the provision of late night refreshment |     |    |            |

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)

|  |
|--|
|  |
|--|

Consultation Question 30:  
Do you agree with each of the following proposals? (Please select one option in each row)

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

Consultation Question 31:  
Do you think that each of the following would reduce the overall burdens on business? (Please select one option in each row)

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

Consultation Question 32:  
Do you think that the following measures would impact adversely on one or more of the licensing objectives? (Please select one option in each row)

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

**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)

**Consultation Question 34:**  
 Do you think that the Impact Assessments related to the consultation provide an accurate representation of the costs and benefits of the proposals? (Please select one option in each row)

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

**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 |
|---|----|------------|
| 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). |    |            |



## Illustrative Minimum Prices

|                                  | At 45p | At 50p |
|----------------------------------|--------|--------|
| Pint of beer, 4.2%               | £1.07  | £1.19  |
| 500ml bottle of beer, 5%         | £1.13  | £1.25  |
| 25cl bottle of beer (stubby), 4% | 45p    | 50p    |
| 75cl bottle of wine, 12%         | £4.05  | £4.50  |
| 75cl bottle of spirits, 40%      | £13.50 | £15.00 |
| 1 litre bottle of spirits, 40%   | £18.00 | £20.00 |
| 1 litre bottle of cider, 8%      | £3.60  | £4.00  |
| 25ml measure of spirits, 40%     | 45p    | 50p    |