

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

A Minimum Unit Price for Alcohol

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

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| Consultation Question 1: Do you agree that this MUP level would achieve these aims? (Please select one option) | | |
| Yes | <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| Don't know <input type="checkbox"/> | | |
| 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>Wolverhampton believes 50p would be the appropriate level at which a MUP should be set. A 50p MUP optimises the reduction in harms that can be achieved whilst striking a balance in not unduly penalising moderate drinkers. A 50p MUP is supported by the CMO annual report of 2008 and previously by the West Midlands Directors of Public Health.</p> <p>There is strong evidence that affordability has an impact on alcohol consumption. Sheffield University's Alcohol Policy Model, version 2, shows that increasing price is effective in reducing alcohol consumption and alcohol related health crime and employment harms. A 50p MUP would impact on hazardous and harmful drinkers whilst minimising the financial impact on moderate drinkers. The study models that a 50p MUP would lead to savings of 3,060 alcohol related deaths, & 97,700 hospital related admissions in the 10th year after implementation; and 42,500, crimes in the first year.</p> <p>Wolverhampton has more than double the national alcohol mortality rates and alcohol mortality rates are 45% higher than similar areas in England, and approx. 50% of the 5,448 violent offences committed during 2009/10 in Wolverhampton involved alcohol; thus Wolverhampton would be keen to maximise the level of savings achieved for the City.</p> | | |

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| Consultation Question 2: Should other factors or evidence be considered when setting a minimum unit price for alcohol? (Please select one option) | | |
| Yes | <input checked="" type="checkbox"/> | No <input type="checkbox"/> |
| Don't know <input type="checkbox"/> | | |
| If yes please specify in the box below (keeping your views to a maximum of 200 words) | | |
| <p>There should be a stronger consideration of the preventative aspect to minimum pricing; NICE PH24 guidance shows that young people who drink tend to drink cheaper products. A MUP addresses the issue of "pocket money" prices for alcohol. Similarly every problematic drinker starts as an unproblematic one so action to address issues of price and availability is welcome.</p> <p>The price of alcohol in relation to other products, Alcohol Concern (2009) show, in their study measuring alcohol price in relation to household income, that the price of alcohol has declined over the last 50 years. Alcohol is 69% more affordable in 2007 than it was in 1980. A MUP must be reflective of individual or household expenditure. The MUP should be regularly reviewed to ensure that alcohol does not become more affordable in comparison to other goods (we suggest annually).</p> | | |

Whilst we appreciate responsible drinkers should not be penalised in Wolverhampton alcohol related mortality and admission rates are highest in the most deprived areas.

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

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| 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? (Please select one option) | | |
| Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> | Don't know <input type="checkbox"/> |
| If Yes please specify in the box below (keeping your views to a maximum of 100 words) | | |
| <p>Children and young people - in Wolverhampton a study has shown that between 5-10% of children are affected by parental alcohol problems and nationally 50% of child protection cases identify alcohol as a factor.</p> <p>Communities and neighbourhoods as this would have an impact on alcohol related incidents in local areas and reduce the fear of crime and ASB.</p> <p>Positive impacts on the on-trade and the night time economy, preventing pre-loading, which would additionally support the reduction of alcohol related crime and disorder.</p> | | |

A Ban on Multi-buy Promotions in the Off-trade

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

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| Consultation Question 6: Are there any further offers which should be included in a ban on multi-buy promotions? (Please select one option) | | |
| Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> | Don't know <input type="checkbox"/> |
| If Yes please specify in the box below (keeping your views to a maximum of 100 words) | | |
| <p>When is sold in multi-buy promotions that includes discounted snacks, such as crisps and “nibbles”. We are not implying that the common higher end meal deal offers seen in supermarkets are included in this.</p> | | |

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| Consultation Question 7: Should other factors or evidence be considered when considering a ban on multi-buy promotions? (Please select one option) | | |
| Yes | <input checked="" type="checkbox"/> | No |
| Don't know | | |
| If Yes please specify in the box below (keeping your views to a maximum of 200 words) | | |
| <p>Buying more alcohol than is required means that it is often readily available in the home, thus it is more accessible to children and young people. In Wolverhampton our Every Child Matters Lifestyle Survey (2010) shows that 21% of secondary school children (12-15yrs) had drunk alcohol during the previous week; of those children 62% had drunk at home and 8% had drunk without their parents' knowledge. Children & YP are more likely to drink at home, past thinking were this happened mostly outside the home.</p> <p>Action on multi-buy promotions will help achieve health objectives and guidance around alcohol free days and unit guidance, which provides a more holistic approach to alcohol.</p> <p>It will also help individuals consider their alcohol intake in relation to the price they pay for it and support moderate drinking.</p> <p>The availability of alcohol at home, means that there is the potential for alcohol to become a normalised every day activity. Rather than for socialisation or entertainment purposes.</p> | | |

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| 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 | <input checked="" type="checkbox"/> | No |
| Don't know | | |
| If Yes please specify in the box below (keeping your views to a maximum of 100 words) | | |
| <ul style="list-style-type: none"> • On-trade would benefit - less pre-loading • Children and young people • Will support the night time economy in the City | | |

Reviewing the Mandatory Licensing Conditions

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| 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 | No | No | No | No |
| B | Dispensing alcohol directly into the mouth | Yes | Yes | Yes | N/A |
| C | Mandatory provision of free tap water | Yes | Yes | Yes | n/a |

| | | | | | |
|---|---------------------------------------|-----|-----|-----|-----|
| D | Age verification policy | Yes | Yes | Yes | Yes |
| E | Mandatory provision of small measures | Yes | Yes | Yes | N/A |

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| <p>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)</p> | | |
| Yes | No X | Don't know |
| <p>If no please state what more could be done in the box below (keeping your views to a maximum of 100 words)</p> <p>The wording of the "irresponsible promotions" conditions is too ambiguous which makes it extremely difficult to enforce. The wording requires significant evidence that the promotion is irresponsible and crime and disorder to have occurred before action can be taken which results in premises still being able to offer alcohol at what responsible authorities would deem to be irresponsible.</p> | | |

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| <p>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? (Please select one option)</p> | | |
| Yes X | No | Don't know |
| <p>If Yes please specify in the box below (keeping your views to a maximum of 200 words)</p> <p>A mandatory condition could be introduced which states that premises are unable to allow patrons to enter the premises if they are already under the influence of alcohol. Many visitors to the venues within the night time economy have already consumed a significant quantity of alcohol which is termed as "pre-loading". Some premises are responsible and have an internal policy that prevents the entre however many do not. By having this type of condition on a premises may see a significant reduction in alcohol levels consumed prior to entering the evening venues which could then see a reduction in alcohol related crime within the night time economy.</p> <p>A further mandatory condition could be introduced to cover CCTV within a premises. A condition relating to CCTV being situated within a premises is regularly attached either by applicants or following consultation with responsible authorities. CCTV conditions have now become a 'standard condition'</p> <p>Late night refreshment venues could also have a mandatory condition attached to them. Late night refreshment venues, particularly ones within the night time economy, can become very busy which in many cases results in a high number of recorded crime. These types of premises currently have no mandatory conditions attached, unless the operating schedule specifically mentions the use of SIA.</p> | | |

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| <p>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? (Please select one option)</p> | | |
| Yes | No <input checked="" type="checkbox"/> | 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>More conditions to be generic to licensed premises such as:</p> <ul style="list-style-type: none"> • All persons selling alcohol must be properly trained before they are allowed to sell any alcohol to the public. Records must be kept of training by the DPS or Premises Licence Holder. Persons selling alcohol must be authorised in writing by the DPS following successful completion of training. The records must be kept on the premises during opening hours and must be made available on request to an officer of a Responsible Authority. • Refresher training must be carried out at regular intervals and records maintained. The records must be kept on the premises during opening hours and must be made available on request to an officer of a Responsible Authority • A 'Challenge 25' policy and 'No ID NO Sale' policy which is supported with signage at all entrances and in the serving areas must be implemented. • Only documents which include a photograph of the purchaser should be used to prove that persons age, e.g. passport, new style driving licence, 'PASS' approved age card e.g. Validate Card or Citizens Card. • A 'Refusals Log' must be maintained, which documents the date and time a refusal of sale is made, the reason for the refusal and the member of staff refusing the sale. The Premises Licence Holder or the Designated Premises Supervisor (DPS) must monitor the Log on a regular basis and sign it to show it has been done. The Log must be kept on the premises during opening hours and must be made available on request to an officer of a Responsible Authority. • A till prompt or a notice must be secured to the till at eye level to remind staff that they must ask for ID if a customer looks under 25. • It would be useful to have a specific and clear health objective as in Scotland, "the protection of the public health" or the prevention of health harms. <p>319 words</p> | | |

Health as a Licensing Objective for Cumulative Impact Policies

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| <p>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)</p> |
| <p>Wolverhampton would like to see the prevention of health harms as a specific licensing objective, where the data described following could also be used.</p> |

However, in relation to CIP

- Hospital mortality data
- Hospital admissions data
- A+E attendance data
- Anonymised treatment services data and information, specifically information about who is accessing treatment services and where from.
- Adhoc audits and lifestyle surveys generated on the basis of local issues or area concerns.
- Alcohol related assault data, currently the collection of such data is provided on the basis of local arrangements and data sharing agreements (as in Wolverhampton where a standalone system is in place; the collection of data is dependent on the goodwill/time of staff entering the data.)

It would be better if Government made the collection of alcohol related assault data mandatory for A&E departments, thus good quality routine local and national data and information would be available.

Hospital data caveat - there also has to be improved categorisation to ensure that alcohol related hospital data is recorded, eg falls may be related to alcohol but are not recorded as such, this would require national guidance/instruction.

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

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

The current guidance allows consideration of health data such as A&E attendances; however this data only considers the impact of the acute harms of alcohol. If a health licensing objective is to be applied then the guidance will need revising to allow long terms health issues to be considered. It also needs to be emphasised in the guidance that this data must be location specific and not general city or regional data.

Licensing authorities and health bodies will need to identify the rational for any CIP based on health grounds and ensures the CIP is worded in such a way that it is clear to applicants where the policy is likely to be invoked.

This may also allow a broader range of areas to become appropriate for a CIP, such as wards where there are high levels of alcohol related admissions and/or mortality, and ever increasing numbers of outlets supplying alcohol. The guidance should make it clear that CIP based on health grounds should not be restricted to night time economy hubs.

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.

Wolverhampton would support the prevention of health harms as a licensing condition.

In Wolverhampton there are strong geographical links to the health harms of alcohol in relation to alcohol related admissions and mortality. There is the ability to use postcode data to map the prevalence of service use to particular areas. However, much of the alcohol related health data relates to where people live (their home address) rather than where alcohol related problems or incidents occur. Wolverhampton's Cumulative Impact Zone is in the City Centre so while there is a range of data available not all of it will be useable in all cases.

Including a consideration of health harms would increase the "visibility" of the health harms of alcohol but more importantly it would place these harms strongly on the agenda alongside the other issues around crime & ASB for example.

Freeing up Responsible Businesses

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 met key 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 | | X | |
| B | The provision should be available to all businesses providing they meet certain qualification criteria to be an ancillary seller | X | | |
| C | The provision should be available to both a specific list of premises and more widely to organisations meeting the prescribed definition of an ancillary seller, that is both options A and B | | X | |

Consultation Question 17:
 If special provision to reduce licensing burdens on ancillary sellers were to include a list of certain types of premises, do you think it should apply to the following? (Please select one option in each row)

| | | Yes | No | Don't know |
|---|---|-----|----|------------|
| A | Accommodation providers, providing alcohol alongside accommodation as part of the contract – | | X | |
| B | Hair and beauty salons providing alcohol alongside a hair or beauty treatment | X | | |
| C | The provision should be available to both a specific list of premises and more widely to organisations meeting the prescribed definition of an ancillary seller, that is both options A and B | | X | |
| D | Florists providing alcohol alongside the purchase of flowers | X | | |
| E | Regular charitable events providing alcohol as part of the wider occasion | | X | |

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

No

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 | X | 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)

What is the legal definition of 'small part of, or incidental to'? It is too vague and open to interpretation.

Consultation Question 20:
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 | X | | |
| 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 | X | | |
| 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 | X | | |

Consultation Question 21:
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 | | X | |
| 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 | | | X |
| 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 | X | | |

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)

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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? (Please select one option)

| | | | | | |
|-----|-------------------------------------|----|--------------------------|------------|--------------------------|
| Yes | <input checked="" type="checkbox"/> | No | <input type="checkbox"/> | Don't know | <input type="checkbox"/> |
|-----|-------------------------------------|----|--------------------------|------------|--------------------------|

Consultation Question 24:
 What impact do you think a locally determined notification would have on organisers of community events? (Please select one option in each row)

| | | Yes | No | Don't know |
|---|---------------------|-------------------------------------|-------------------------------------|--------------------------|
| A | Reduce the burden | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| B | Increase the burden | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

Consultation Question 25:
 Should the number of TENs which can be given in respect of individual premises be increased? (Please select one option)

| | | | | | |
|-----|--------------------------|----|-------------------------------------|------------|--------------------------|
| Yes | <input type="checkbox"/> | No | <input checked="" type="checkbox"/> | Don't know | <input type="checkbox"/> |
|-----|--------------------------|----|-------------------------------------|------------|--------------------------|

Consultation Question 26:
 If yes, please select one option to indicate which you would prefer:

| | |
|------------|--------------------------|
| 15 | <input type="checkbox"/> |
| 18 | <input type="checkbox"/> |
| Don't know | <input type="checkbox"/> |

Consultation Question 27:
 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 |
|---|---|-------------------------------------|--------------------------|--------------------------|
| A | Determining that premises in certain areas are exempt | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| B | Determining that certain areas are exempt in their local area | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

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? (Please select one option)

| | | Yes | No | Don't know |
|---|---|-------------------------------------|--------------------------|--------------------------|
| A | Motorway services should receive a nationally prescribed exemption from regulations for the provision of late night refreshment | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

| | | | | |
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| 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) | | | | |
| None. | | | | |

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| 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 | X | | |
| B | Remove the centrally imposed prohibition on the sale of alcohol at MSA's for the on and off trade | | X | |
| C | Remove the centrally imposed prohibition on the sale of alcohol at MSA's but only in respect of overnight accommodation – "lodges" | | X | |
| D | Remove or simplify requirements to renew personal licences under the 2003 Act | | X | |

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| 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 | X | | |
| B | Remove the centrally imposed prohibition on the sale of alcohol at MSA's for the on and off trade | X | | |
| C | Remove the centrally imposed prohibition on the sale of alcohol at MSA's but only in respect of overnight accommodation – "lodges" | X | | |
| D | Remove or simplify requirements to renew personal licences under the 2003 Act | X | | |

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| 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 | X | | |
| B | Remove the centrally imposed prohibition on the sale of alcohol at MSA's for the on and off trade | X | | |
| C | Remove the centrally imposed prohibition on the sale of alcohol at MSA's but only in respect of overnight accommodation – "lodges" | X | | |
| D | Remove or simplify requirements to renew personal licences under the 2003 Act | | | X |

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)

The applicant could instead be required to engage locally with neighbouring properties / properties within a specific area i.e. leaflets, local notice boards.

Remove the restriction on petrol filling station, as this can be overcome by most and adds little/no value.

Impact Assessments

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 | | X | |
| B | Multi-buy promotions | | X | |
| 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 |
|-----|----|------------|
| X | | |

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).

A. Minimum unit pricing

Pg 8 E. Appraisal (Costs and Benefits) – We are not convinced by assumptions made in paragraph 3, regarding a 45p MUP having a having a greater impact at 2014 prices, than at 2008 prices. Given 50p has been widely recommended/supported as an appropriate MUP we are unsure why 45p was chosen, it would have been useful to compare the impacts of both 45p and 50p MUP.

B. Multi-buy promotions

We would like to see more analysis on the impact of multi-buy promotions on micro and small business, which we understand is difficult to quantify. However, within Wolverhampton we have many small local/corner shops (often BME owned) which provide an income to individuals and a service to local communities; and whilst we fully support a ban on multi-buy promotions and the MUP as a way to address issues of problematic alcohol use, we also recognise that for some small /micro businesses this may have an economic impact on their businesses.