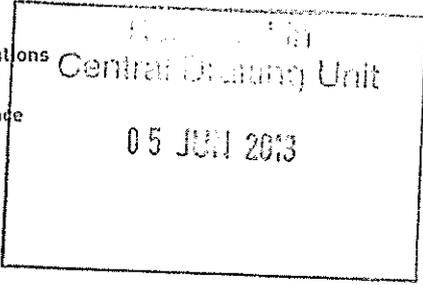
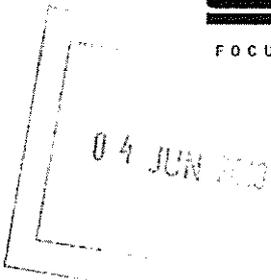


CCP- Swinson

Building Services Engineers
 Electrical & Mechanical Installations
 Commercial & Industrial
 Planned & Re-Active Maintenance
 Periodic Testing
 Fire & Security
 Energy Efficiency Solutions
 Voltage Optimisation



SEE
 FOCUSED ON RELIABILITY



29 May 2013

Rt Hon Dr Vince Cable
 Secretary of state for Business, Innovation and Skills
 Dept for Business, Innovation and Skills
 1 Victoria Street
 London
 SW1H 0ET

Dear Sir,

Re: Government Consultation Pub Companies and Tenants April 2013

SEE are a multi discipline contractor with Electrical, Mechanical and Building fabric divisions. We have been trading for over 30 years with a turnover in excess of £30 million, we have and remain an electrical contractor for both reactive and planned statutory work in the Pub retail sector for over a decade.

During that time we have seen the growth and reduction of the industry as well as the effects from the law of unintended consequences, which ill thought out Legislation has inflicted upon the market. As a contractor who works for free of tier pubs, managed and leased estates for several industry players I believe we are well placed to comment on your proposed legislation.

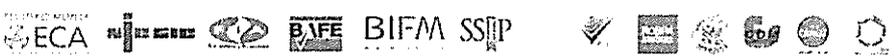
If I understand your proposal correctly you wish to reduce the overall charges of tied pubs to a similar level to free of tier premises. Your document points to the fact that some of the tied lessees have numeracy or literacy problems who one could reasonably expect are in need of exactly the type of assistance in running business that one of our clients Punch provides. These tenants benefit from a complete infrastructure support system. Punch provide an essential industry service in training newcomers in the skills they require to manage a successful small business. There is plenty of opportunity for these tenants to move on to a different business model once they have 'learnt the ropes'.

While there is a cost to the support infrastructure which cannot be denied and this must of course be paid for in some way to sustain the model, I have found that our client to take a most reasonable approach, for example while we can and do offer a complete reactive electrical and testing service we are not a nominated *reactive* contractor. We are available if required 24/7 to all sites and our rates are competitive but should the tenant decide to use his own contractor or affect his own repairs he is free to do so. We are always available as back up should we be required for emergency or trade affecting issues. Our *only* nominated task is the annual electrical testing (EICR or PIR test). This test is a electrical statutory requirement for which compliance is compulsory. Our rates for this work are tendered regularly and benchmarked against industry standard. In essence we keep the premises compliant but allow the tenant to manage the rest as they see fit.

This sort of light touch management which ensures both safety compliance and flexibility to tenant typifies our clients approach. We are regularly in contact with the area managers who drive all over their estates to meet, consult and resolve any issues the tenants may have. This dedicated resource has a cost true but without it would many of these tenants be willing to take on a business?

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We have serious concerns that your proposals will make the leased business model unsustainable with the unfortunate consequence of more pub closures, job losses and many of the very people you intend to help with no support structure and no opportunity to begin their career in the industry. Unfortunately some may well end up on benefits. I therefore hope you will take our views on board during your review period. You should be more aware than anyone that statistics alone do not represent the full picture.

I look forward to your response in due course.

Yours faithfully,

David Bates
Head of Maintenance

Cc Mr lee Scott MP (Conservative)

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