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Alcohol Strategy Consultation 4th Floor Fry
The Home Office
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4 February 2013

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Thank you for the opportunity of responding to the Home Office's consultation on delivering the Government's policies to cut alcohol fuelled crime and anti-social behaviour as part of the Government's Alcohol Strategy. Further to the useful roundtable event that I attended last month, I wanted to write to outline our views on the provision of alcohol at Motorway Service Areas (MSAs) in England and Wales and reaffirm our support for deregulation in this area.

Welcome Break is the UK's second largest leading MSA operator with 24 MSAs in Britain together with 25 associated lodges. Welcome Break MSAs help to promote road safety by offering a number of services, goods and amenities which motorists require, including fuel, restaurants, general goods, toilets, lodging and leisure facilities, thereby encouraging them to take a break from driving. Welcome Break Ltd is the owner and operator of 15 'post 1992' privately promoted MSAs or similar operations, where alcohol is licensed to be sold. The locations are as follows:

- Baldock(alcohol sales licensed in the Hotel)
- Cambridge (Hotel)
- Cardiff (alcohol sales licensed in amenity building)
- Charnock Richard (Hotel)
- Cobham (amenity building & Hotel)
- Derby (Hotel)
- Eurotunnel (amenity building)
- Hopwood (amenity building)
- London Gateway (Hotel)
- Newport Pagnell (Hotel)
- Oxford (amenity building)
- Peartree (amenity building)
- Peterborough (Hotel)
- South Mimms (amenity building)
- Woodall (Hotel)

Summary: Welcome Break, based on our evidence and 40 years' experience as a MSA operator, would support the necessary amendments to Section 176 of the Licensing Act 2003 so that there is no general prohibition on the sale of alcohol at MSAs originally publicly promoted (i.e. 'pre-1992')

MSAs). We believe that, as with 'post 1992' MSAs, MSA operators (and their brand subsidiaries) should have the opportunity to make an application for a licence to sell alcohol to the respective Local Authority and the decision on that application, together with any terms and conditions, should be the responsibility of the Local Licensing Authority. We would therefore answer 'yes' to consultation question 28 reproduced at the end of this submission.

Current anomaly: We agree with the widely-held view that the current pre/post 1992 anomaly and availability of alcohol at some sites and lodges makes no sense and should be rectified. We also believe that motorists could purchase alcohol at premises close to many junctions on the motorway network, thereby leaving the ban on off-sales at MSAs somewhat surplus to requirements.

On-sales at MSA lodges / hotels: We strongly urge the Government to allow the sale of alcohol in MSA lodges to overnight residents given that it would, perhaps somewhat ironically, actually improve road safety as our research in this area shows that a large percentage of lodge residents actually drive to a local alcohol licensed premises to have a drink, before returning to the lodge for the night, thereby also creating an unnecessary journey on the SRN. In order to assuage any road safety concerns for 'morning-after' drink driving, we would, of course, be happy to provide increased drink-drive warnings and advice as a condition of any of lodge licence being granted.]

In addition, it is worth pointing out that, of our hotels that already have alcohol licences, four of them have had licences for circa 15 years without there having been any issues of anti-social behaviour.

Off-sales at MSAs: We strongly support the deregulation of licensing laws to allow off-sales of alcohol to be permitted at all MSAs, and not just post 1992 sites. We believe that this would not have a detrimental effect on road safety and that this has already been proven to be the case at the large number of MSAs across the country where alcohol has successfully been sold over the last 18 months, without any incidents of anti-social behaviour or adverse effect on drink driving.

There has already been extensive positive feedback from customers regarding the practical ability to purchase alcohol at our MSAs (predominantly in our Waitrose stores), allowing them, for example, to purchase a bottle of wine to accompany their evening meal for when they arrive home, rather than having to make a separate journey or unnecessary stop on the local road network to make such a purchase.

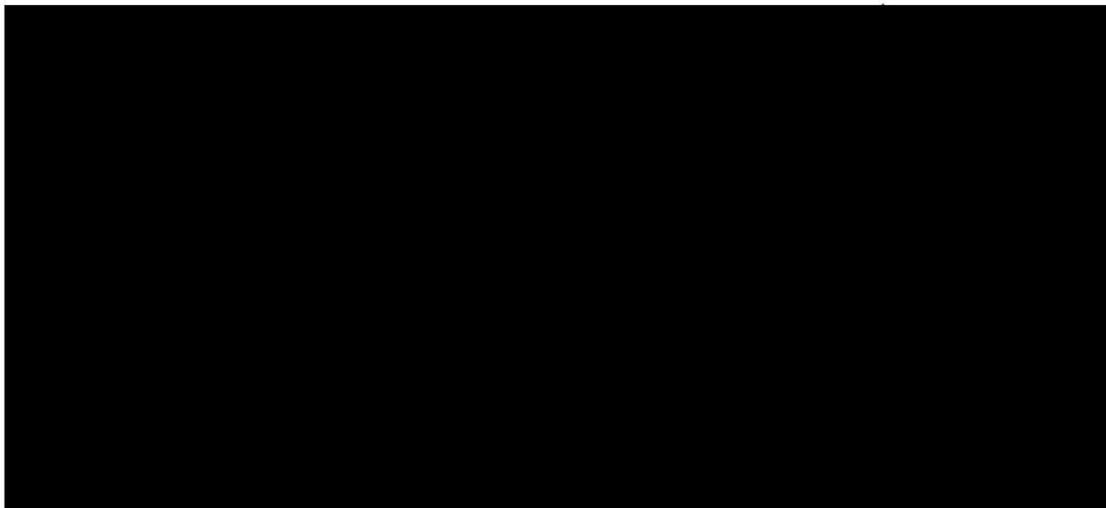
In addition, Welcome Break is, and already does, satisfy any requirements that may be prescribed by the relevant Local Licensing Authority as conditions of its licence, including retailing alcohol responsibly with trained staff. We would, of course,

engage proactively with Licensing Authorities about any other conditions that they required such as extra warnings for drink driving, voluntary bans of off-sales during periods of travel around football matches and the discreet location of alcohol in premises where it is sold.

On-sales at MSAs: We believe that MSA operators, where off-sales licences have already been granted, have already clearly demonstrated their commitment to responsible management. Even though, at present, there is less customer demand for it than off-sales, Welcome Break supports deregulation to allow for on-sales at MSAs – particularly given our evidence shows that currently many drivers exit the SRN in order to find a restaurant where they, and more importantly, their passengers can have an alcoholic drink with their meal. We believe that deregulation in this area – with the relevant safeguards in place as required by the Local Licensing Authority – will allow for greater customer choice and reduce journeys on the local road network.

European example: By bringing about the reforms outlined above, the Government would also be aligning itself with many other countries in Europe, including France and Italy, where both on and off-sales of alcohol are permitted at MSAs.

We very much look forward to working with you, your colleagues and the Highways Agency in deregulating the existing onerous and, crucially, inconsistent rules regarding alcohol licensing at MSAs and to bringing about reform in this area.



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