

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

Response from the Punch Taverns PLC

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Personal Information



INTRODUCTION

Punch Taverns is one of the UK's largest leased pub companies with a portfolio of around 4,500 leased pubs nationwide, ranging from pub restaurants to traditional drink led locals. Our aim is to become the UK's highest quality, most trusted and best value leased Pub Company. Our pubs operated by thousands of enterprising individuals - our Partners – who are running their own pub businesses in our premises

In 2005 we took the decision to hold the Premises Licence for our estate. Although we do not conduct and provide licensable activities direct in our leased pubs, the holding of the Premises Licence imposes upon our business a significant licensing regulation and compliance function.

Corporate Social Responsibility (CSR) is embedded across many elements of our business, from corporate fundraising to responsible retailing. We have dedicated teams in place to ensure that our pubs operate to the highest standards. We do all we can to ensure that our pubs are not operating irresponsible drinks promotions, or serving underage drinkers or those under the influence of alcohol.

As Portman Group signatories and supporters of Drinkaware we do not condone the irresponsible promotions and pricing of alcohol, and we have actively supported the 'Why let good times go bad?' campaign to tackle binge drinking amongst 18 to 25 year olds.

Responsible retailing forms a key part of our partner training, and in the last eighteen months we have over 700 Partners completed our responsible retailing training. We also provide Risk Management pack for our partners, which give clear guidance on current legislation and best practice, backed up by the support of our Risk and Compliance Teams, who provide specialist advice and guidance. We also support the BBPA's Customer Unit Awareness Campaign, part of the Association's contribution to the Government's Alcohol Responsibility Deal by making information and publicity available to our Partners.

To further support our Partners, we launched "The Punch Buying Club" offering our partners a 24/7 service allowing partners to access all possible assistance to help run their business, this includes online training, regional workshops, Risk Management material, mandatory signage and many other such material.

All of our Area Managers are trained to a minimum of BII level 4 in Multiple Retail Management, which consists of eight modules including communication, negotiating, business knowledge and marketing. We believe a well trained, talented and high performing team will help our Partners reach their potential.

We also have a number of other specialist employees to ensure that our Partners are provided with the best knowledge throughout their relationship with Punch Taverns, our recently filled Regional Launch Managers are in place to give our Partners the

best start to ensure they understand everything for running a safe, legal and compliant business.

We believe that Punch Taverns is in a uniquely qualified position to make a valuable submission as, not only do our 4,500 premises cover every Local Authority area in England and Wales, but we also have significant experience of both the application process and the enforcement procedure currently in force.

We would continue to urge the Government to recognise the key role that pubs play in the responsible retailing of alcohol within well regulated environments. Punch Taverns remain committed to responsible retailing and we continue to work closely with all our lease holders and Responsible authorities ensure that key regulations are understood.

A MINIMUM UNIT PRICE FOR ALCOHOL

Consultation Question 1:

Do you agree that this MUP level would achieve these aims? (Please select one option):

Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Don't Know	<input type="checkbox"/>
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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).

Punch Taverns fully supports the opportunity to have alcohol priced at socially responsible levels to rebalancing the price gap to help protect small independent businesses, and to restrict the sale of cheap alcohol.

The Beer Duty escalator has exacerbated the trend in declining sales in the on trade consumption with 42% tax on a pint since 2008 'pulling' the price conscious consumer towards the supermarket multi buy promotions. As such it was recently reported that in 2011 53% of all beer sales were made in the off trade where this volume of sale is not regulated. This push has increased the issue of Preloading. Preloading is becoming a considerable concern for the industry and many businesses see a significant rise in the number of individuals who appear to have consumed a substantial volumes of alcohol at home.

Punch Taverns believe the most appropriate place to consume alcohol is in the pub, a controlled, managed, regulated, safe drinking environment.

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"/>
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If yes, then please specify these in the box below (keeping your views to a maximum of 200 words).

Factors that should be considered are;

- Aligned to off trade only
- Reduction in alcohol consumption
- Reduction in crime
- Reduction in anti social behaviour
- Reduction in alcohol related fatalities
- Reduction on alcohol related hospital admissions
- Direct health care cost savings

Minimum unit pricing should only be adopted as a measure with a specific purpose. Unfortunately there is a tendency to 'mix' messages when it comes to alcohol, with the underlying desire to prevent unhealthy levels of consumption being lost in rhetoric that seemingly pillories anyone involved in the sale and supply of alcohol irrespective of whether they are 'responsible' or not.

Minimum unit pricing therefore should not be used as a means to raise prices as a sop to the anti-alcohol minority; only as a means to ensure that the very cheapest products and offers, where a correlation between their purchase and alcohol related harm can be proven, are prevented

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 updated in line with inflation each year.	<input type="checkbox"/>
The minimum unit price should be reviewed after a set period.	<input checked="" type="checkbox"/>
Don't know.	<input type="checkbox"/>

Should MUP be introduced, it is necessary that a formal, objective review is provided within a specified timeframe, taking into account all other factors or evidence to ensure levels are set accordingly.

Consultation Question 4:

The aim of minimum unit pricing is to reduce the consumption of harmful¹³ and hazardous¹⁴ drinkers, while minimising the impact on responsible¹⁵ 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"/>
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If Yes please specify in the box below (keeping your views to a maximum of 100 words).

It is clear that MUP will have an effect on lower income households. It cannot be said that all sales of cheaper alcoholic products are to people who would be classed as 'harmful' or 'hazardous' drinkers. Indeed, any attempt to introduce a minimum price will effect a significant number of other people who enjoy alcohol responsibly. As such, MUP needs to be carefully monitored to ensure that it does not cross the line into preventing people from enjoying alcohol responsibly simply by being set too high, without actually focussing on its primary purpose.

A BAN ON MULTI-BUY PROMOTIONS IN THE OFF TRADE

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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All retailers' on-trade and off-trade should act in a responsible manner and not in a way that encourages customers to consume at harmful levels. This ready available alcohol at multi-buy prices encourages those to purchase more than they would normally and as such will have a knock on effect in both crime, disorder and health harm. Introducing a ban on multi-buy promotions would encourage a change in drinking behaviour and patterns.

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"/>
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If yes, please specify in the box below (keeping your views to a maximum of 100 words).

Consultation Question 7:

Should other factors or evidence be considered when considering a ban on multi-buy promotions?
(Please select one option):

Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>	Don't Know	<input type="checkbox"/>
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If yes, please specify in the box below (keeping your views to a maximum of 200 words).

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).

REVIEWING THE MANDATORY LICENSING CONDITIONS

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 - see glossary)?

Please state Yes / No / Don't know in each box:

		Prevention of crime and disorder	Public safety	Prevention of public nuisance	Protection of harm from children
A.	Irresponsible promotions (see condition i above)	YES	YES	YES	NO
B.	Dispensing alcohol directly into the mouth (see condition ii above)	NO	NO	NO	NO
C.	Mandatory provision of free tap water (see condition iii above)	NO	NO	NO	NO
D.	Age verification policy (see condition iv above)	NO	NO	NO	YES
E.	Mandatory provision of small measures (see condition v above)	NO	NO	NO	NO

Whilst Punch Taverns was not particularly persuaded that there was any necessity for the mandatory code (as it was then known) to have been introduced by way of the mandatory conditions we not now seek to argue that there is any necessity for those to be removed.

In so far as irresponsible promotions are concerned (particularly the all you can drink for a fixed fee activity) it can only be appropriate that those are no longer permissible.

However, dealing with the second point (dispensing alcohol directly into the mouth) whilst that activity may not be something that would be acceptable it not our view that there was any real evidence to support the suggestion that there would be more than a handful of premises conducting such activity in the whole of England and Wales. Certainly we were unaware of any of our premises (several thousand) permitting such activity at any time. The question then was it is legitimate to impose a condition on the face of all premises licences prohibiting such activity when there was but a handful of premises ever conducting the activity in the first place. Better it would be suggested (and maintained) to utilise the review procedures targeting individual premises on their individual circumstance.

However that is not to seek to remove the condition from the face of premises licences as that would (probably) now send the wrong message.

Furthermore the provision of free tap water wasn't necessarily something that we took the view was necessary as an obligation imposed on the face of every premises licence but equally it is not our view that this need be removed. That imposing further obligations on premises licence holders to advertise and/or display signage or notices to this effect seems unduly prescriptive.

The obligations have an age verification policy not something to which we object and can only be an assistance in protecting children from accessing alcohol.

Whilst all of our premises now provide small measures we are not persuaded that that has necessarily contributed to the promotion of the licensing objectives but equally we are bound to observe (whether or not it was necessary to introduce it as a mandatory condition in the first place) that we have no appetite to see that condition now repealed. Having gone to the trouble and expense of introducing further measures, further literature and further glassware (etc) this proposal appears to have been broadly welcomed and does not in our view merit amendment

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	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Don't Know	<input type="checkbox"/>
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If no, please state what more could be done in the box below (keeping your views to a maximum of 100 words).

The Punch Taverns estate is a leased pub business. Our lessees manage and operate their "own" businesses. However, they do so with the support and assistance of our field based operations team. Whilst from time to time there are particular issues at particular premises it was not nor is it our view that the various mandatory conditions prohibiting certain (reprehensible) behaviour was ever prevalent (or for that matter even present) in our pub estate.

We believe that it is the (impressive and under utilised) powers of reviews afforded responsible authorities, residents and other stake holders that can best address particular problems in particular premises.

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 - see glossary) which could be tackled through a mandatory licensing condition? (Please select one option):

Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>	Don't Know	<input type="checkbox"/>
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If yes, please specify in the box below (keeping your views to a maximum of 200 words).

Mandatory conditions, by their very nature, run contrary to the idea of premises writing their own operating schedules to reflect the nature of their operation. Whilst there are certain conditions that should be ubiquitous- door staff being SIA registered, policy to prevent under-age sales etc it is suggested that all mandatory conditions should be capable of being applied to on and off-sale premises equally. The test for mandatory conditions should fulfil this simple requirement-every thing else should be left to operators to be held accountable for in the provision of their operating schedules and through the review process.

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):

Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>	Don't Know	<input type="checkbox"/>
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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).

As the owner of a large number of premises licensed for consumption of alcohol on the premises we are undoubtedly concerned by the rise of irresponsible alcohol consumption, particularly that undertaken outside of the supervision and control that a public house (or a premises licence for the consumption of alcohol on the premise) affords.

Preloading is a significant concern and many of our business partners report a significant rise in the volumes of persons attending their premises (often later than was historically the case) who appear to have consumed significant volumes of alcohol at home or before they have "gone out".

We believe that the single best place for alcohol to be consumed is in the controlled and protected environment that a public house offers. Therefore that the mandatory code sought to particularly direct itself towards the on trade rather than the off trade appeared to us to be inappropriate and misconceived. That further controls and measures may need to be directed toward the off trade is to our mind beyond discussion. However, that need be through the mechanism of a mandatory condition attaching to all licences or whether that may better directed to particular premises evidencing particular problems is another matter.

Although it has featured in discussions and previous consultations it remains Punch Taverns' view that far too many premises repeatedly failed to promote the licensing objectives that do not appear to face sufficient sanction (most obviously revocation) even where the failure to promote the licensing objectives appears to have been flagrant.

HEALTH AS A LICENSING OBJECTIVE FOR CUMULATIVE IMPACT POLICIES

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.

As the Cumulative Impact Policies are not a creature of statute, Council's policies differ greatly in the amount of evidence provided in determining to introduce CIP's. Adding health as a consideration would dilute what is already a complex area for all parties wishing to consider the reasons for implementation of a CIP in a particular area and therefore whether a potential application stands a reasonable chance of success (or not). Indeed, areas which suffer from either street drinking or where health bodies consider there is a disproportionate amount of unhealthy drinking are likely to differ from those areas currently subject to CIP's on the basis of a disproportionate amount of crime and disorder. This dilution is of no benefit to any party, including the councils who would have to determine whether to introduce CIP's possibly on health grounds alone and the evidential base for so-doing.

In addition, a health CIP, presupposes that the sale and supply of alcohol is somehow inherently 'bad'.

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	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	Don't Know	<input type="checkbox"/>
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If yes, please specify which aspects in the box below, keeping your views to a maximum of 200 words.

The whole licensing system is predicated on the basis that each individual application must be considered on its merits. A health consideration, by its very nature, would be more of a 'blanket' objection and as such potentially undermine the philosophical basis for the Licensing Act. It would confuse the issue where committees are being told on one hand to decide an application on its merits, where on the other hand they are being told to take into account, where a health representation is raised, the suggestion that some customers are drinking more than is technically good for them

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.

Consideration of data outside of the cumulative impact of an excessive number of people on nuisance and crime would dilute the purpose of CIP's and effectively change the nature of their use. As such, it may lead some councils to impose blanket CIP's where in fact targeted action by police and other services is more appropriate. In recent years the targeted approach has seen reduction in crime where CIP's have been carefully utilised, such as in Reading town centre.

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 (see paragraph 9.5).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
B	The provision should be available to all businesses providing they meet certain qualification criteria to be an ancillary seller (see paragraph 9.6).	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Consultation Question 17:

If special provision to reduce licensing burdens on ancillary sellers were to include a list of certain types of business, 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.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
B	Hair and beauty salons, providing alcohol alongside a hair or beauty treatment.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
C	Florists, providing alcohol alongside the purchase of flowers.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
D	Cultural organisations, such as theatres, cinemas and museums, providing alcohol alongside cultural events as part of the entry ticket.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
E	Regular charitable events, providing alcohol as part of the wider occasion. ²³	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Whilst we are content for residential accommodation broadly categorised as bed and breakfasts to provide a complimentary drink where the value of the alcohol is "gifted" rather than sold we endorse the view that such accommodation premises will have a bar where alcohol is sold, whether open only to residents or residents and guests or indeed the general public these merit a licence.

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

The licensed trade is heavily regulated and our tenants incur not inconsiderable expense in complying with application regulations. We fully support attempts to reduce burdens on all business. It is noted that that the proposed does not include licensed premises.

Our suggestion that greater efforts should be made to reduce the burden on responsible licensed businesses. One area could be considered is the provision of hot food or drink (late night refreshment) when it is ancillary to the sale of alcohol. It is submitted that hot food and drink should be encouraged at premises that sell alcohol for consumption on the premises.

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	<input checked="checked" type="checkbox"/>	No	<input type="checkbox"/>	Don't Know	<input type="checkbox"/>
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If no, please describe the changes you would make in the box below (keeping your views to a maximum of 200 words).

In order to ensure that both the ancillary status is maintained and the loop holes are avoided might one alcoholic drink, per adult per day/transaction be an acceptable measure.

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.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
C	Introduce a new, light touch form of authorisation for premises making ancillary sales - an ASN - with no requirement for a personal licence holder.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Consultation Question 21:

Do you think that the following proposals would impact adversely on one or more of the licensing objectives (see glossary)? (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.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
C	Introduce a new, light touch form of authorisation for premises making ancillary sales - an ASN - with no requirement for a personal licence holder.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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)?

There remains a significant number of premises with conditions on the face of the licence that are out of date, reference redundant legislation, held over from redundant legislation, or have otherwise been replaced by licensing (or other) reform.

Albeit with the consent of the premises licence holder, the licensing authorities should be empowered to remove such of those conditions as remain on existing premises licences (perhaps with due regard to the responsible authorities). By way of example reference to the Licensing Act 1964 seems, at best, confusing if not contrary to the existing provisions

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"/>
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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 checked="" type="checkbox"/>	No	<input type="checkbox"/>	Don't know	<input type="checkbox"/>
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Consultation Question 26:

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

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

Temporary Event Notices allow for flexibility in terms of permitting licensable activities either outside of the normal operating hours of a premises already licensed or at premises not licensed for a particular activity. It is also a useful means of 'testing the water' in terms of establishing whether particular activities or hours are appropriate at premises prior to making expensive applications. All of the above are positives in terms of the TENs system. In addition, now that the EHO can make representations to TENs and conditions already on a premises licence can be applied to them, there are sufficient safeguards in place to allow for more to be permitted in any given 12 month period.

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 premises types are exempt in their local area.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Please see the answer to Q29 as it is felt that a nationally prescribed exemption in this matter would be more appropriate.

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 service areas 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"/>

Although this question has no direct relevance to Punch Taverns, motorway service Areas are unique insofar as they serve a transient customer base, away from towns or other conurbations. Therefore, they are not going to undermine the licensing objectives by serving late night refreshment without the need for a licence.

Consultation Question 29:

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

Any premises that serves late night refreshment as an ancillary activity to other licensable activities should be exempt from having to hold a permission for providing late night refreshment, so long as it is on the premises, to existing customers and up to closing time (or at the very least the terminal hour for licensable activities). This would not undermine the licensing objectives and would free up operators from a potential financial burden of applying for late night refreshment when seeking to provide food or hot drinks to customers late at night.

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 requirements to advertise licensing applications in local newspapers.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
B	Remove the centrally imposed prohibition on the sale of alcohol at MSAs for the on and off-trade.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
C	Remove the centrally imposed prohibition on the sale of alcohol at MSAs but only in respect of overnight accommodation – "lodges".	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
D	Remove or simplify requirements to renew personal licences under the 2003 Act.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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 requirements to advertise licensing applications in local newspapers.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
B	Remove the centrally imposed prohibition on the sale of alcohol at MSAs for the on and off-trade.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
C	Remove the centrally imposed prohibition on the sale of alcohol at MSAs but only in respect of overnight accommodation – "lodges".	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
D	Remove or simplify requirements to renew personal licences under the 2003 Act.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Consultation Question 32:

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

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

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):

All types of regulated entertainment be deregulated (as the performance of live music) where provided between 08:00 – 23:00 on any day at the premises that are open for the purpose of being used for the supply of alcohol for consumption on the premises, before an audience of 200 or less.

The provision of late night refreshment be deregulated when provided as ancillary to the supply of alcohol for consumption on the premises

Removal of the requirement to advertise in a newspaper an application for a premises licence for the variation of a premises licence.

Suggested that due to the variety of annual renew payment dates for premises licences, the adoption of one common date for all fee payments would reduce the burden on both the industry and the Licensing Authorities.

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.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
B	Multi-buy promotions.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
C	Health as a licensing objective for cumulative impact.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
D	Ancillary sales of alcohol.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
E	Temporary Event Notices.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
F	Late night refreshment.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
G	Removing the duty to advertise licence applications in a local newspaper.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
H	Sales of alcohol at motorway service stations.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
I	Personal licences.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>	Don't Know	<input type="checkbox"/>
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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).