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From: Rita King, Deputy Director (Pub & Leisure)
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Janet Elliott,
Licensing and Service Improvement Officer,
Dudley Metropolitan Borough Council,
5 Ednam Road,
Dudley
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Dear Janet,

Council's Gambling Policy Consultation

Thank you for allowing us to respond to your Gambling Policy Consultation. The British Beer & Pub Association (BBPA) represents brewing companies and their pub interests, and pub owning companies, accounting for 98% of beer production and around two thirds of the 53,000 pubs in the UK. Many of our members own and run pubs in Dudley. The Association promotes the responsible sale of alcohol and management of licensed premises. It has a range of good practice information and guidance for member companies. Further information is available on our website at www.beerandpub.com.

Our comments are as follows. This response is also supported by British Institute of Innkeeping (BII), the professional body for the licensed retail sector, the Association of Licensed Multiple Retailers (ALMR), which represents the interests of smaller independent companies within licensed retailing and the Federation of Licensed Victuallers Association (FLVA) which represents self-employed licensees in England.

On Page 10 Alcohol Licensed Premises Gaming Machine Permits it states **If a premises wishes to have more than two machines, then it needs to apply for a permit and the applicant will be required to attend a hearing of the Licensing and Safety Committee.**

We are surprised by this statement as most other local authorities designate their officers to deal with applications certainly for up to four machines and would refer applications for perhaps more than four to the committee.

Pubs have had amusement with prize machines on their premises for many years and we would expect this to be covered by way of a delegated function on the council's part.

The same paragraph also states **All plans submitted with the application must set out the siting of each gaming machine.**

It is our understanding that there is no legal requirement for applicants to provide a plans with permit applications. Although the authority may consider a plan would be helpful licensing authorities will already have plans of premises on file along with premises licence applications so being required to submit plans would place another administrative and financial burden on applicants.

Machines are not permanent fixtures and indeed may need to be moved on occasions to ensure proper supervision and management.

We would suggest that the reference to plans accompanying permit applications is deleted or clarified and the policy is amended accordingly.

We trust these comments are helpful and will be taken into account in the final version of the policy.

Yours sincerely,



Rita King
Deputy Director (Pub & Leisure)