

SUPPORTING EVIDENCE RE: APPLICATION FOR A NEW PREMISES LICENCE FOR BEAK MRKT, 47 TRAFALGAR STREET, BRIGHTON, BN1 4ED UNDER THE LICENSING ACT 2003.

To whom it may concern,

As the applicant for a premises license at 47 Trafalgar St, which falls within the Cumulative Impact Zone, I wanted to take this opportunity to a) explain how we plan to address the unique needs of the CIZ, and b) highlight the “exceptional circumstances” of the project.

If you have any questions ahead of the scheduled hearing on the 4 April, please do not hesitate to contact me.

Thank you for your time,

REDACTED (REDACTED | REDACTED)

BEAK BREWERY

The license has been submitted on behalf of Beak Social Club Ltd, which is a subsidiary company of Beak Brewery Ltd, an independent micro-brewery in Lewes. The brewery was founded by me in 2020 after almost a decade working as a restaurant critic for *The Guardian* and *Good Food Guide* and the founding ethos was to create beers for food pairing. This is something we remain committed to.

Since launching in 2020, we have risen to become one of the highest-rated breweries in the UK and our beer is enjoyed at hundreds of restaurants in 25 countries globally. Alongside the brewery, we operate two existing licensed premises. The first is a taproom and street-food canteen in Lewes, and the second is the venue for These Hills, a two day annual food and drink festival. I am proud we have operated both venues for the last three years with no incidents or complaints. I believe this is attributable to three things: 1) we take our obligations as license-holders very seriously; 2) food plays a central part at our venues; and 3) our customers are respectful, discerning and responsibly-minded.

BEAK MRKT

47 Trafalgar St is a derelict warehouse that has stood empty for some years, attracting vandalism and graffiti. Only one other use has been proposed: demolition and replacement with a block of luxury offices and flats. This was widely rejected by local residents and businesses due to the massive disruption the building works would cause. Major concerns were also raised about the effect it would have on the neighbourhood’s rich and diverse cultural milieu, particularly the iconic Prince Albert next door.

Despite this rejection, demolition could still go ahead if the landlord decides to appeal the committee’s decision, which is likely. With this in mind, we have proposed a far more sympathetic and less disruptive plan: keep the current building and use recycled materials to build a beautiful indoor street-food market called BEAK MRKT, evocative of those found in Bilbao, Florence and London’s Borough Market. Crucially, this plan would require very little by way of building works *and* fit in neatly with the neighbourhood’s reputation as a hub for thriving independent businesses and amazing food and drink culture.

We have worked closely with an architect to draw-up a plan comprising four affordable kitchens run by local chefs, a specialty coffee concession-come-bakery and a small bar. The majority of the space would be a central dining area where customers can enjoy coffee, pastries, brunch, lunch and dinner, along with locally-produced craft ales and wine from a bar run by us (Please see Annex 1). We would also encourage the space to be used by freelancers and local community groups (plans are afoot for weekly running and yoga groups plus space on our walls would be set aside for use by local artists). Furthermore, in order to help food businesses struggling with Brighton’s sky-high rent, the kitchen spaces would be rent-free (we would instead charge commission). We estimate that the venue will create more than 28 Living Wage accredited jobs.

MEASURES TO PROMOTE SOCIAL RESPONSIBILITY

We take social responsibility and the requirements of the Cumulative Impact Zone extremely seriously

and I am sympathetic to concerns regarding anti-social behaviour. It is for this reason we have so far invested more than £25,000 in consultancy fees (working with an acoustic surveyor, architect and alcohol license consultant) to ensure we generate plans that adhere to the requirements of the Cumulative Impact Zone. Measures we have put in place to ensure the project has no negative cumulative impact, include:

- The venue is food-led and substantial food will be available at all-times alcohol is served. To be clear; BEAK MRKT is first and foremost a street-food market with four kitchens and a coffee concession / bakery with 97% of the space committed to food preparation and seated dining. The bar accounts for just 3% of floor space and is one of just five concessions operating in the space.
- There will be no vertical drinking. Customers will not be permitted to eat or drink anywhere in the building unless seated.
- We will only serve premium priced drinks. Beak's beer retails at between £6 and £8 a pint with most of our beer served in halves and two-thirds measures.
- The premises will operate a "Challenge 25" policy whereby any person attempting to buy alcohol who appears to be under 25 will be asked for photographic ID to prove their age. The recommended forms of ID that will be accepted are passports, official Photographic Identity Cards issued by EU states bearing a hologram or ultraviolet feature, driving licences with a photograph, photographic military ID or proof of age cards bearing the 'PASS' mark hologram. We have not applied for a live music license and have no intention to do so and have also not applied for a late license.
- We have commissioned an independent acoustics company (Acoustic South East) to create a detailed noise impact assessment, which I can send upon request. The report concludes: "The premises are capable of being operated without adverse impact to the nearest residential receptors. It is apparent from the noise modelling that the commercial sounds generated from the new premises use, are consistently below the measured soundscape likely to be experienced from just road traffic noise. The impact of the new premises is therefore considered to be low and unlikely to negatively impact the existing residential receptor locations."
- We will not tolerate queues outside the venue and do not expect them to form since we won't be hosting any live performances.
- There will be signage at the exit to request that customers respect neighbours by leaving quietly. There will also be signs stipulating the zero tolerance drugs and anti-social behaviour policy.
- SIA registered door staff will operate at the premises as follows: Fridays and Saturdays: Two door staff from 20:00 until the premises has closed to the public, licensable activity has ceased, and the venue is completely clear of patrons.
- The management and premises will have an absolute zero tolerance policy towards drugs and drug misuse.
- The premises will become a member of the Business Crime Reduction Partnership or similar scheme approved by the Licensing Authority. The scheme must operate, subject to local coverage, radios and additionally an exclusion/banning scheme of named individuals within both the day and night time economy.
- Waste will be stored internally until collection and there will be no waste collections between 19:00 and 06:00 hours.
- We have applied to open no earlier than 9am and stop serving alcohol no later than 11pm even on weekends.
- We will not be screening regular sports events and will not be marketing the venue as an 'end destination' or one that specifically caters to sports fans.
- We have met in person with representatives from the local area in order to listen to their feedback. We have also been in touch regularly with Brighton & Hove Licensing Team in order to listen to their advice.
- We will surrender the premises license if the business folds thus protecting the site from being used in the future by less socially responsible tenants.
- Finally, we have been liaising directly with both local residents (via the NLCA) and Brighton & Hove Police Licensing Department to listen to what recommendations they propose. An addendum summarising what measures have been agreed will be submitted by the police ahead of the hearing.

ISSUES TO ADDRESS

We are planning a street-food market with four kitchens and a coffee concession-come-bakery. This concept is most definitely food led with a substantial food offering but it does not fit neatly into any of the categories outlined in the Matrix Model for licensing decisions. However, the closest category appears to be that of a café. Therefore, we are requesting an alcohol license that falls within this category but with some minor allowances outlined below. The following allowances would reflect the exceptional nature of BEAK MRKT (please see below) and put us in line with Shelter Hall, another much larger 600-person capacity street-food market within the CIZ, which was granted an [alcohol license](#) in 2020:

- **Allow alcohol to be served until 11pm.** Since our project falls somewhere between a café, which in the CIA can serve alcohol until 10pm, and a restaurant which can serve alcohol until midnight, we believe it is reasonable to ask to serve alcohol until 11pm. This would mean us closing more than an hour earlier than our neighbours at The Prince Albert.
- **Allow customers to carry drinks from the bar to their table.** All customers would be asked to present a table number before ordering in order to avoid vertical drinking. This is the same right afforded to Shelter Hall please see Clause 4.3 of [their premises licence](#). (Evidence of the ability to order alcohol at Shelter Hall's bar can be provided on request). There would be no space for vertical drinking with seating available for 100% of capacity.
- **Allow severely limited off-sales.** Due to our premium pricing, we think the possibility of someone buying alcohol from us to drink on the street is extremely low but we have offered several options to mitigate the risk: 1) limit the volume of off-sales per customer, 2) ban off-sales on match days 3) ban off-sales in the evening.

EXCEPTIONAL CIRCUMSTANCES

According to clause 3.3.2. of Brighton & Hove's [matrix policy](#), departure from the policy is allowed in "exceptional circumstances". Exceptional circumstances may include: "consultation with and meeting requirements of responsible authorities", "an appropriate corporate social responsibility policy", "community contribution to offset impact" and "community support". We strongly believe that BEAK MRKT meets these requirements in the following ways:

- **Consultation with and meeting requirements of responsible authorities.** Since submitting the premises application, we have led extensive and productive consultation with all relevant groups, including Brighton & Hove City Council, The Police and the North Laine Community Association (NLCA). We have listened to their recommendations and submitted an extensive list of ways in which we intend to meet the requirements of the CIZ. I have also personally responded to the three objections we have received from local residents and am committed to continuing to work with them as the project progresses.
- **Community contribution to offset impact.** In order to help food businesses struggling with Brighton's prohibitively high rent, the kitchen spaces will be offered rent-free (we would instead take a small amount of commission). We are a Living Wage accredited organisation and estimate that the venue will create more than 28 Living Wage accredited jobs. We will allow community interest groups to use BEAK MRKT as a meeting space for free. Plans are also afoot for local running and cycling groups to use it as a hub and we will be inviting freelancers who cannot afford co-working spaces to work from the venue during the day, with zero rental charge. The venue will also be used to host charity fundraisers. We have a proven track record of doing this at our Lewes-based taproom, which has used to raise money for the UNHCR and The Launchpad Collective.
- **Community support.** The project is exceptional in terms of the amount of public support it has received. Our premises license application has received just three objections from local residents and two letters of support. Our [planning application](#), meanwhile, has received 41 comments in total, 36 in support, 1 neutral comment and just 4 objections. This is a very rare ratio for any planning application. Furthermore, at a recent NLCA meeting I attended, the plans were accepted very favourably – the group even showed interest in using the venue to host its regular meetings. We have been inundated with messages of support from people living and working in Brighton via email and social media. An example of the kind of emails we have received so far can be seen in Annex 2. Meanwhile, [a recent post on Instagram](#) announcing the launch of the project received 110 comments of support and 1,865 likes. We have also been left speechless by the support we have received from the media, both locally and nationally. Examples of this press coverage can be seen in Annex 3. These articles

include messages of support from local business leaders and a Green Party ward councillor for the area.

- **A highly unusual offering.** In stark comparison to most hospitality venues, the bar at BEAK MRKT would only sell premium craft beer, the majority of which would be brewed by us (Beak Brewery) within nine miles of Brighton (minimising our carbon footprint). Our range includes beers made with hyper-local ingredients grown in the South Downs National Park. We would not sell any macro mass-produced beer. The same approach would apply to wine and cider, with a strong focus on low-intervention brands from local producers. It should be added that Beak Brewery already has an international as well as national following (it exports to more than 25 countries) and it hopes to use its name to draw international tourism to Trafalgar Street, simultaneously boosting sales for other businesses in the area.
- **Sympathy with the surrounding area.** The North Laine area of Brighton is world-famous for its thriving independent businesses. It is the beating heart of the city and a true rarity in the UK where generic-looking high streets are often dominated by giant chains. What we are offering fits in perfectly with Brighton's reputation for inclusivity, community, independence and thinking out of the box. BEAK MRKT will enhance not dilute this reputation.
- **Public good.** As mentioned earlier in this document; a planning application to demolish 47 Trafalgar St and replace it with an office block was recently denied due to the amount of negative comments it received from the press and local community. Major concerns were raised about the disruption such a building project would cause for local residents and there were fears it would diminish the area's cultural milieu. Despite this, it is likely that demolition could still go ahead if the landlord appeals the committee's decision, which is likely. It is hard to imagine a more suitable alternative than a community-focused street-food market accommodating affordable spaces for start-up businesses and supporting local food and drink producers. Crucially, this plan would require very little by way of building works and fit in neatly with the neighbourhood's reputation as a hub for thriving independent businesses and amazing food and drink.

ANNEX 1



ANNEX 2 (NB THE CONTACT DETAILS BELOW ARE NOT FOR THE PUBLIC DOMAIN)

"I've heard the exciting news about your new Brighton venue. Really hope it gets the green light and you can bring delicious beer and good times to our wonderful city."

REDACTED
REDACTED
REDACTED
REDACTED

"I welcome the proposal to turn the derelict warehouse into a vibrant food and drink space which will provide a great venue for the community and support a fantastic local business."

REDACTED
REDACTED
REDACTED
REDACTED

"I wanted to email in support of your exciting new project. I think that BeakMrkt sounds exactly what our wonderful city needs. I love the sense of community that these kinds of venues bring (with obviously the benefit of amazing food and beer!). I live locally in Hove, a few mins from the station (please open another near Hove station too! That would be the dream!)."

REDACTED
REDACTED

"I make this statement of full support on behalf of myself and my companies, Hand Brew Co and Hand Brew Pub. We want to offer our voice to the support of this venture. Myself and my wife (who is one of the directors of the Hand Companies), lived in North Laine for a decade before moving out to Kemptown when we bought the Hand in Hand. We lived around the corner on Frederick Place and a block over on Gloucester Road. The North Laine is an incredible, vibrant place to live and what makes it great is ideas like Beak Market. We're not residents of North Laine anymore, but we spend a lot of time in North Laine at various bars, cafes, restaurants - especially the Albert and Green Door Store for live music. And of course, walk past it regularly to the station or back from the station. Beak Market would be an outstanding addition to the area and I believe it will be a huge success where it is. Far better than a rental car business or flats! This is what Brighton's about!"

Clark and the Hand team.
Hand in Hand
33 Upper St James's Street
Kemptown, Brighton
BN2 1JN
REDACTED

"I love Beak brewery and have had many an excursion to Lewes to visit their site. It is well-managed, and community-minded (they've supported the charity I work for in the past, amongst numerous other examples). I'd be over the moon for BEAK MRKT to go ahead! I got so excited looking at the plans, and totally think it'd be in keeping with the area. It looks like a great initiative, and I can imagine will overall be a positive for the area. I've been hankering for similar (we have Shelter Hall, but it isn't quite the same as this) for ages, having been to the like across the country. It is definitely something Brighton is missing.

Happy to be contacted for any follow up!"

REDACTED
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"I'd like to add my name to the list of people in support of Beak's planning application in the city of Brighton. What a fantastic idea, which I'm sure would benefit the local economy and community. Fully support the plans. Much more interesting than a car park!"

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"What a fantastic proposal Beak Market in Brighton is. I am 100% behind it, if there's anything further you need from me please let me know. I have also offered similar support through the planning portal."

REDACTED
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"We used to live next to Mercato Metropolitana in Elephant and Castle. The tap room and street food combo was excellent and it would be a terrific addition to our city. Best of luck with this!"

REDACTED

REDACTED

ANNEX 3

<https://www.theargus.co.uk/news/24185628.food-market-taproom-bring-slice-europe-brighton/>

<https://www.restaurantonline.co.uk/Article/2024/03/15/beak-brewery-to-open-beak-market-food-hall-in-brighton>

<https://www.thedrinksbusiness.com/2024/03/beak-brewery-plans-street-food-market-venue-in-brighton/>

<https://www.brightonandhovenews.org/2024/03/13/taproom-planned-for-controversial-music-venue-site/>

<https://uk.news.yahoo.com/street-food-market-taproom-planned-180000867.html>