

Appendix C.2

EG CON ENDS 20.01.22 VALID PCD (SI)

To whom it may concern,

As landlord for 73-75 Kings Road Arches, Brighton we would like to make a representation in favour of the licence application by Free Haus Ltd.

We have offered the prospective tenant a 10 year lease of the premises. The propose permitted use is as a retail outlet for canned craft beers, gift packs and associated merchandise; as a local brewing information hub; for ticketed tasting events and as ancillary there to as a logistics, meeting and office space.

The use of the adjacent arches is very much retail and visitor experience based. The outlets include clothing, art and design shops, visitor attractions for i360, Rampion Windfarm and West Pier Trust as well as high quality hospitality offers – Murmur restaurant and Flour Pot Bakery.

The proposed use by Free Haus Ltd compliments the existing businesses and would be a unique addition to the seafront portfolio. As landlord for the premises we are not offering any outside patio space for tables and chairs as would be the norm for a hospitality type use. This will reduce dwell time and prevent drinking of alcohol on the promenade. Whilst we do not restrict opening hours within the lease, we understand from the application that the business will only be open during the daytime except when there are ticketed events. Again, this supports the existing uses which, with the exception of Murmur, are focused on daytime trading.

We strongly feel that based on their previous ventures, Free Haus Ltd will be a valuable, high-end addition to the seafront and will add to the quality and vibrant mix of businesses in this particular area.

Kind regards

Toni Manuel
Seafront Development Manager

Jane Pinnock
Seafront Estates Surveyor

FREE HAUS LIMITED | WEST PIER ARCHES

LICENSE APPLICATION ADDITIONAL INFORMATION

11.01.2022

PREMISES

73-75 Kings Road Arches, Brighton, BN1 2LN
(Landlord, Brighton & Hove City Council)

The space is comprised of 3 arches, roughly 8.8m wide x 7.3m deep (each 2.9m x 7.3).

Into this space we need to build a toilet block for staff to use as well as a counter service area. The standard recommended size of a toilet cubicle is 1.5m x 0.85m. A toilet, counter and thoroughfare will likely take up the equivalent space of 1 arch.

PLANNED USE

We understand and appreciate the property is within the CIZ and understand the Council's *Statement of Licensing Policy* as the basis for all licensing decisions. We operate 3 venues in Brighton: Brighton Bier Taproom, Brighton Bierhaus (within the CIZ) and Haus on the Hill and are very aware of our responsibilities and licensing requirements.

We trust that the information below will show that we are not doing anything that adds to issues of *binge-drinking created by cheap alcohol and fierce price competition* in the city and give you the confidence to support our application. Neither will be engaging in irresponsible promotions or underage sales and the beer on sale will comply with, and go beyond, the *Sensible on Strength* policies as well as meeting *Drinkaware* guidelines.

We would like to open a retail store for our BRIGHTON BIER brand and business.

This will be a gift-shop/retail outlet selling a wide range of branded merchandise and other products, whilst also acting as an information hub for modern and historic brewing in Brighton, providing us with central office space to work from, and a space to hold small ticketed-closed door small-serve tasting events.

As we are an international award-winning brewery, this would also entail the sale of beer giftsets and packs. This will be just one component of a wider offering as explained below.
We are not planning to open an off-license.

We discussed our plans with the Seafront Office who “*see this as very much a retail and visitor experience to compliment the other businesses in the area (West Pier Arches)*”.

MERCHANDISE

We intend to sell a wide range of branded merchandise onsite and available online, which can be fulfilled from the arches. Plans for merchandise, include:

- **CLOTHING** – T-shirts, sweatshirts, jackets, hats and other items such as a range of bags. Storage and display of which takes up considerable space.
- **SEASIDE GIFTS** – for example Brighton Bier branded rock, beach towels.

- **ART** – we sponsor Brighton version of the *Pubstops* poster (national series where every pub in a city is put on a “tube map”) and these would be available alongside hopefully other art related to our brand and beer probably including *BeerDoodles™* and/or *Art By Volume* (redesign brands as vintage record sleeves).

We have long planned to run a competition with the Art College to design a biannual t-shirt, these designs could be sold as prints, and we would also look at selling old *Regency Society* images of brewing history in Brighton & Hove.



- **OTHER GIFTS** – we hope to collaborate with a local skateboard shop to sell a special edition range of skateboard decks, which complements the clothing range.

We also intend to sell unique gifts like jigsaw puzzles. Complicated large jigsaws are very popular, and we know beer and home brewing fans will like puzzles that are very difficult given the uniformness of the image like a “mash bed” or bucket of hops:



We also know how popular boardgames are currently and would look to sell a small section of brewing specific games, such as *The Taverns of Tiefenthal*, *The Belgian Beers Race*, *Brew Crafters* and *Brewopoloy*.

None of these encourage drinking, they are all strategic board games and none of them require or include drinking in the game.



- **HOME DISPENSE EQUIPMENT** – lockdown made home dispense more popular. We already partner with the UK's leading provider and would have a display that showcases their equipment (RRP £430+) with discount voucher available to buy the equipment from them with a keg of Brighton Bier (RRP £120+). Combined purchase £550+.
- **ECOMMERCE SALES** – we have a web shop for national home delivery. We intend to have a secure iPad for customers so they can order for home delivery which would benefit residents and tourists. We currently offer FREE DELIVERY in Brighton and Hove. We can also fulfil some of these deliveries from the arches.

All of these types of merchandise need to be prominently displayed and to have sufficient stock on the premises, which would take considerable space before we consider beer.

- **BEER** – as an international award-winning brewery, customers will also expect to be able to buy beer from us. We will be very actively encouraging customers to visit our pubs and the brewery itself in East Brighton to try a wider range of our beer.

Our intention is to focus on gift-sets and packs of beer. Given the beachfront location, we will not sell any beer in bottles OR sell any branded Brighton Bier glassware.

We would sell lower ABV beers, likely between 4.0% - 5.0% ABV, which also meet the *Sensible on Strength* guidelines. And only 'Brighton Bier' products.

The beer will be expensive:

- **Co-op sell 4x 440ml 'Carling' for £4.20, or the equivalent of £2.39 per litre.**
- **By comparison, 4x 330ml 'Brighton Bier' (4.0%, Pale) is £14.00, (£10.61 per litre)**
- **We are not competing with cheap supermarket or off-license deals.**

- Compared to Carling, Brighton Bier is nearly **4.5x (343%) more expensive than the standard supermarket offer.**

We are not, and have no interest in, competing with off-licenses and supermarkets, and adding to issues caused by cheap alcohol and competitive pricing. We are very much at the other end of the spectrum. Running a modern-day craft brewery is extremely expensive. This is an artisanal product, with high production overheads, and the price of our beer reflects this.

Our signature 'Brighton Bier Pale Ale' (4.0% ABV) has won prestigious international awards around the world. Likely pricing and packaging for this, which is the cheapest beer we sell, include:

- Fridge Pack (4x 330ml), **£14.00**
These would be boxes of 4 beers, designed to fit in the fridge with a perforated section to remove for access to the beer (boxes will be Brighton Bier branded):



- Six Pack (6x 330ml), **£18.00**
Either in a branded Brighton Bier box of 6 cans or provided in a 6-can recyclable biodegradable cardboard carrier to avoid plastic into which the cans clip for carrying and greater rigidity/safety in a bag (as well as being compostable).



- Bier, Pilsner and T-Shirt Gift Pack (2 cans), **£20.00**
A set including 2 cans plus a tshirt stored in the top of the box.



- A single can of 330ml 'Brighton Bier, 4.0% Pale', if we sell them, would be £3.50 - £4.00 (£10.61+ per litre), which is far removed from supermarkets and off-licenses prices. 440ml cans would be even more expensive at c.£4.50 - £5+ for a single can.
- In some cases prices would be more expensive than above, e.g. a 5.0% beer would likely be £18 for a Fridge Pack of 4x 330ml beers (£13.64 per litre) and £24 for 6x 330ml.

We trust that this shows we have no interest in competing with off-licenses and supermarkets to sell cheap alcohol or encourage binge-drinking. Rather, we are intending to sell high quality, international award-winning products at a high price, at sensible ABVs and a high comparable price per unit that exceeds the *permitted price model* to complement the other Brighton Bier merchandise available in the retail unit.

Craft beer needs to be stored at cold temperatures; at the brewery we have a large cold store for this. Light and temperature will rapidly degrade beer. Refrigeration is vital to maintain beer freshness, flavours and aromatics as well as preventing oxidation, which turns the beer sour or develops off-flavour which in turn ruin the product. At the Arches, storage space will be limited, and the units are South-facing which will make the space hotter. We will need to store the beer and pre-made packs in fridges to maintain the integrity and quality of the product and prolong its shelf-life.

Cold storage is key for craft beer with bigger hop flavours that can degrade quicker in heat and without the pasteurisation process that is used in many mainstream mass-produced beers. Craft beer is typically unpasteurised because the rapid heating and chilling of the pasteurisation process is not good for the flavour of the beer as aromas tend to be lost, and the flavour of the beer is 'flattened' by the process.

Fridges like the one below would be 90cm wide x 50cm deep. 3 or 4 fridges would therefore take c.1.5m² - 2m² from a total floor area of c.64m² and so only a very small percentage of available space giving us plenty of room for other plans, whether that be merch, displays, event/workspace, storage, service counter and toilet.



The shop is an important way to highlight and raise awareness of Brighton Bier to residents and tourists and actively encourage them to visit our other venues located in Kempton (Bierhaus), Hanover (Haus on the Hill) and East Brighton (Brewery).

We hold regular events at the brewery, such as tours and beer launches, and the pubs (which are both in the prestigious *Good Beer Guide*) and will advertise these to customers.

ADDITIONAL USES FOR THE ARCHES

As explained, we hope to use the space for more than just a retail space for the brand. We would also plan to:

- **CREATE AN INFORMATION HUB** – this would be to highlight the rich brewing heritage in the city which dates to 1545 and the Black Lion Brewery, as well as Brighton’s modern brewers. We will create maps and walking tour pamphlets that enable visitors and tourists to explore Brighton’s brewing history visiting sites around the city and also where to visit the current breweries. These are away from the seafront and busy central areas.

We know people in Brighton who operate paid walking tours and hope to be partner with them to do guided tours that start from the arches then take people to sites around Brighton finishing at a brewery or craft beer specialist elsewhere in Brighton or Hove.

- **CLOSED-DOOR SMALL SCALE TICKETED TASTINGS** – on occasion we would like to have the flexibility to run some small-scale ticketed tastings. These would be closed door events and likely to be a maximum of 10-12 people given both the space and the practicalities of conducting a tutored tasting.

Tickets would likely be £25+ per person for a tasting of a small number of beers, served in small measures. The focus is on people learning about different beers styles and the brewing process not on the amount of beer available.

This would be on the only on-sales. The events would be bookable in advance and is the reason that we would like to have a license until 8pm so that we can do these events in an evening after work, e.g. 6:00pm – 7:30pm.

- **MEETING/WORKSPACE** – we would have 2 tables in the centre of the space to enable the events, but for the vast majority of time this provides us with a working space or display tables. The brewery is based in East Brighton, doesn’t have an effective office space and is less convenient to meet existing and prospective clients.

At the Arches, we can meet clients and reps who are in Brighton in an attractive central location as well as being able to quickly and easily pop out to visit our own clients in Brighton and Hove. We work with hotels, restaurants, cafes, pubs and bars across the city and so this is the perfect vantage point from which to regularly see them.

OPENING/LICENSED HOURS

We do not intend to be open in the evening and be part of the night-time economy.

The hours we requested on the license are 11am – 8pm.

We expect that from mid-autumn until early spring hours would likely be 11am – 5pm.

From late Spring to early autumn, we would like the flexibility to be open until 7pm or 8pm as this would also enable us to hold the ticketed events discussed on midweek evenings after work.

The only onsales would be the ticketed events.

A lot of the time we would envisage the unit being closed by 5pm. We might open or be onsite before 11am but would not sell alcohol until this time.

PROMOTION OF LICENSING OBJECTIVES

GENERAL

- We will operate a strict over 18 policy and 'Challenge 25 Policy' to ensure underage drinking is not possible, as we do in our other venues, and require identification bearing customer's photograph and date of birth. Accepted ID will be 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
- Any beer sold will be in closed containers (cans in 330ml or some 440ml sizes) with no glass for sale. The only alcohol for sale will be Brighton Bier products and all meet criteria for *Sensible on Strength*.
- We will not conduct irresponsible promotions or marketing activities to encourage an irresponsible approach to the consumption of alcohol. Neither will we provide free alcohol or heavily discounted prices that could undermine licensing objectives.
- There will be no posters/flyers of comparable promotional materials in the vicinity that could be reasonably considered to condone, encourage or glamourise anti-social behaviour or refer to the effects of drunkenness in any favourable manner.
- Customers will disperse rapidly from the shop and there will be no seating outside and no onsite drinking (except for closed door ticketed events). As a landlord, the Seafront Office (Brighton Council) will not permit any music to be played which is audible from outside the premises and combined with no outside seating will not therefore encourage people to gather immediately outside the shop.

THE PREVENTION OF CRIME AND DISORDER

- We will operate in partnership with the Seafront Office and Police in the area and follow and support any and all initiatives.

- We are not looking to operate late in the evening and become part of the night-time economy. Hours as explained will hopefully be seasonal, but largely dictated by daylight.
- There will be no glass beer bottles. Beer will only be in closed cans and no glassware will be available either to drink from.
- We will install CCTV and appropriate recording equipment in line with Home Office guidelines to cover internal and external public areas, including the entrance, which will record at all times. The CCTV will be sufficient to record in all lighting levels inside the premises, footage will be stored for minimum 31 days, and full and immediate cooperation and technical assistance will be provided to the police as required, including provision of footage.
- An incident log will be maintained showing detailed notes of any incidents that occur on the premises or anything we are aware of directly outside. This will be inspected and signed off by the DPS on a monthly basis. The log book will be on the premises and available for inspection by the Licensing Authority, Police or Seafront Office as required. Refusals of sales of alcohol will also be recorded, logs will be kept for 24-months.
- No cash would be kept on the premises, and all transactions would likely be card-based.

PUBLIC SAFETY

- We will abide by and rigorously follow all health and safety requirements and seafront policies.
- Nothing will be sold in open containers and there will be no glass beer bottles or glassware available for sale.

THE PREVENTION OF PUBLIC NUISANCE

- There will be no late-night activities on site. We are not intending to be part of the night-time economy. We operate 3 busy venues in Brighton, are experienced operators and have had no issues.
- Beer sold will be at sensible ABVs and will be expensive. This will be a premium purchase and attract a different type of customer to the cheap off-licenses and supermarkets, as explained earlier. Beer will just be one aspect of the merchandise available for purchase, we will therefore draw a diverse customer base looking to purchase a variety of different items not just beer.
- There will be no music audible outside the shop and no seating outside the arches to encourage loitering, staff will also monitor the immediate outside area and report any incidents as necessary.

THE PROTECTION OF CHILDREN FROM HARM

- We will operate a strict over 18 policy and 'Challenge 25 Policy' to ensure underage drinking is not possible, as we do in our other venues, and require identification bearing customer's photograph and date of birth.
Accepted ID will be 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
- Signage advertising 'Challenge 25' will be prominently displayed.
- All staff will be trained on licensing requirements, the lawful selling of age restricted products and refusing the sale of alcohol to a person who is drunk. (We have extensive successful experience of this from the 3 venues we run without problems in the city).

