



Pubs Code Review Team
Department for Business, Energy and Industrial Strategy
1st Floor, Orchard 3
1 Victoria Street
London
SW1H 0ET

15th July 2019

Dear Sir or Madam

Pubs Code and Pubs Code Adjudicator Statutory Review

I am writing to you regards the statutory review for the period to the end of March 2019 of the Pubs Code and the performance of the Pubs Code Adjudicator.

I note that the statutory review will consider if there are any revisions of the Pub Code which, in the Secretary of State's opinion, would enable the Pubs Code more fully to reflect the principles set out in section 42(3).

We are currently exempt from the code as we have fewer than 500 pubs. We have signed up to self-regulation via the voluntary Code of Practice for the operation of tied tenancies and leases. We believe the voluntary system is working well and as such we continue to subscribe to it. We also subscribe to PICAS and PIRRS to resolve complaints and rent disputes.

Since the Pubs Code has been in place we have had no complaints referred to either PICAS or PIRRS. With regards to rent reviews, all rent reviews since the introduction of the Pubs Code have been completed within the 6 month period set out in the Voluntary Code. We work closely with our Business Partners (Tenants) and believe that we will only succeed if they do. We believe our agreements to be fair and include the following terms as standard:

Landlord and Tenant Act protection

3 to 5 year agreements

Business Partners can give 6 months' notice at any time

Inflation linked rent increases only.

We waive our right to an open market rent review on renewal (unless the Business Partner wishes to opt for one)

Our open book accounting policy allows us to monitor performance of our Business Partners. As you will see from the tables overleaf the average turnover of our Business Partners has grown year on year. The margins they are making on these sales have also been stable.