



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 Sirs,

PUBS CODE REVIEW

St. Austell Brewery is a member of the Independent Family Brewers of Britain and has a pub estate of 150 tenanted pubs. We are therefore not currently covered by the Code and I am writing to put our case as to why following the review we feel strongly that that remains to be the situation.

I would request that the review considers the following evidence to support our request to remain outside the code:

1. We continue to subscribe to a voluntary code which is working well.
2. We refer disputes to PIRRS and PICAS but none have ever arisen.
3. The Company is part of an annual survey of our tenants by KAM Media. Combined with surveys of other tenanted pub companies this has created a Licensee Index with which we can compare our performance and ensure that our tenants are happy with the working relationship between us and that they are receiving helpful guidance from our business development managers and the company as a whole.
4. We provide substantial operational support in the form of advice on matters such as marketing, website development, menu design, business rates and reducing costs.
5. Our tenancy agreements are short term with easy exit clauses but can be renewed.
6. We enjoy a good and close working relationship with our licensees which is particularly important to us as a family company.
7. We are proud to provide high levels of landlord investment in our tenanted pubs.
8. Our tenants receive security under the Landlord and Tenant Act.
9. Our business model remains an attractive proposition to tenanted pub operators, many of whom have been tenants of ours for many years.

In conclusion I trust the above information reinforces the responsible way in which we conduct our businesses respecting our landlord/tenant relationships and, as a consequence, a good reason for our company remaining exempt from the Pubs Code being below the 500-site threshold.



[Redacted]

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