

Leith Bottle Shop - Overprovision response

I am writing with the regards to the 'Great Junction Street' IDZ area found in the list of Premises Licences on the overprovision consultation. I run Leith Bottle Shop – a newly established offlicence specialising in local craft beer – located at 30 Great Junction Street. We have a full Premises Licence for off-sales and we have recently submitted a Major Variation to add a very limited on-sales capability, in order to try to support the long term sustainability of the business, enabling us to continue to offer employment opportunities and enhance the local economy.

The beer and brewing scene in Edinburgh is the strongest of its kind in Scotland, and much of this activity is centred in Leith, due to its concentration of industrial space, along with its proximity to the city centre. The growing scene provides numerous benefits to the area and the city, bringing locals, tourists and residents across the city to Leith. They spend money in local hospitality businesses, who in turn purchase beer produced by local craft breweries, keeping money circulating in both Leith and Edinburgh's wider economy. The local industry also boosts Leith's reputation as a hub for food & drink.

Designing 'Great Junction Street' an Overprovisioned Area would be very likely to have a significant adverse effect on the local scene and across the city of Edinburgh, at a time when small craft breweries nationally are struggling from inflation and the cost of living crisis.

Moreover, some venues are not yet operating on full Premises Licences, instead operating on Occasional Licences. This includes local craft breweries who have not yet completed the full Premises Licence application process. Occasional Licences used these circumstances allow small businesses to set up quickly, and to test out potential new revenue streams without the burden of the full Licensing process. Of course, a designated Area of Overprovision would create a presumption against new Premises Licences when these businesses are ready and able to navigate the full licensing process.

Overprovision would also be a barrier to new small businesses opening, such as any new breweries that may otherwise be keen to occupy Leith's industrial space. Direct off- and onsales i.e., brewery shops and taprooms) are essential to small craft breweries, where they can achieve the best margins, helping ensure the sustainability of their businesses and continue to employ staff into the long-term. Similarly, almost all new restaurants would need an on-sales licence to survive. Also, cafés could benefit from staying open later: this may not be financially viable without serving alcohol, but it is good for the community to have additional spaces to meet in the evening besides pubs.

Our own application for very limited on-sales will allow us to sell more local products and create additional employment in the shop, as our business becomes more financially sustainable.

I also have some concerns about the process being used to assess areas as 'overprovisioned'. The assessment seems to be based on the number of individual Premises Licences, as opposed to their on- or off-sales capacity, or other individual factors relating to the licence itself. This essentially means that the process is geared against many small licence holders such as, say, a small restaurant) in favour of fewer, larger licence holders like a Tesco supermarket). This does

not take into account the benefit that these small businesses bring to the area, and the adverse effects of overprovision health, crime) may be more likely to come from particular larger establishments like large pubs. Furthermore, large companies have the time, money and professional expertise to navigate the additional burden created by overprovision in the licensing process, whereas this would simply serve as a deterrent to smaller businesses.

Furthermore, the 'Great Junction Street' list in the list of Licensed Premises on the consultation appears to be incorrect, in that it doesn't match the official IDZ for this area: two of the premises pilot Beer and Dionysus) are not in the 'Great Junction Street' IDZ and so have been incorrectly listed here. This could potentially affect other respondents' submissions to this consultation, as they see a greater number of licenced premises in that list than there are in reality.

I do hope you take these views into account alongside any other views submit in response to this consultation. I look forward to the conclusion of the process, which I hope supports the sustainability of the local industry that Leith and Edinburgh should be proud of.