

# CULTURE AND ENVIRONMENT SCRUTINY COMMITTEE

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MONDAY, 26 FEBRUARY 2024 AT 6.30 PM  
COMMITTEE ROOM 1, TOWN HALL, JUDD STREET, LONDON WC1H 9JE

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## SUPPLEMENTARY AGENDA

	<b>Wards</b>
<b>4. DEPUTATIONS (IF ANY)</b>	
The deputations relate to item 6 (Camden Evening and Night-Time Economy Report) on the main agenda.	
Barbara Brownlee – Chief Executive Soho Housing	(Pages 3 - 4)
Katie Gemmell – Chair Tenants and Residents Association Camden Town (TRACT)	(Pages 7 - 8)
David Kaner – Chair Covent Garden Tenants Association Licensing Sub-Committee.	(Pages 9 - 12)
Tricia Richards – Chief Executive Castlehaven Community Association	(Page 13 )

**SUPPLEMENTARY AGENDA ENDS**

Issued on: Friday 23 February 2024

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**From:** [REDACTED]  
**To:** [Sola Odusina](#)  
**Subject:** Deputation against the proposed Evening and Nighttime Strategy and the process used to develop it  
**Date:** 22 February 2024 14:26:45  
**Attachments:** [image001.png](#)

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Dear Sola Odusina

As a social Housing landlord with several hundred properties in the area I wish to make a deputation against the proposed Evening and Nighttime Strategy (ENTS). I have already submitted a deputation against the proposed new licensing policy and I am pleased to see that it has been withdrawn and would like to comment further on this strategy.

1. Soho Housing was not invited to be part of any consultation on developing this strategy, we were not invited to the citizens assembly nor were we included in any surveys. I would like to know if any other social housing providers were included formally in this process. This is very important as residents in social homes have a complete lack of choice about where they live, they are mainly people with a level of vulnerability, often families, who are made a single offer of accommodation. This results in their being dependent upon their local council to run the neighbourhood in a safe, clean and reasonable way, providing good facilities and balancing the needs of all in an area.
2. I would point out that Soho Housing also owns and manages 40 businesses in the west end area, both Camden and Westminster and appreciates the need for a thriving evening and nighttime economy, our own income depends upon this. However we also understand the need to balance this with the wellbeing of our residents. Many of our residents live directly above our commercial premises and so this careful balancing act is critical for us, we assume it will be as important, for Camden council.
3. Having read the proposed strategy it is immediately apparent that there is no reference to “balance “ in the vision. The text itself refers to residents and accepts that it can be difficult to balance everyone’s needs and indeed the Mayor’s Night-time Vision clearly states “*a balance must be struck between work, rest and play for London’s eight million residents.* “ But the word balance is completely missing from the vision statement, it must be inserted or else it will not be prioritised and residents needs will be overlooked.
4. The ENTE hotspots are currently dark, dirty, under policed and under cleaned by the council. While marshals and volunteers are a good thing, nothing can make up for the gradual reduction of civic control and presence in the middle of the west end. Camden say they wish to support and grow the nighttime economy in an inclusive way, this can only be done if people feel safer going out at night into

better lit, cleaner and safer streets with good safe transport home again. This can only be achieved by working with local partners and the police.

5. If the stated aim of increasing and diversifying night-time users is to be met there should be an explicit statement suggesting a reduction in alcohol related premises to allow something different to flourish.
6. Finally I would like to return to the consultation process. It feels rushed and almost deliberately so. I believe the Citizen Assemblies were held about a year ago and nothing has really taken place since. I have looked at the Mayors good practice guide which suggests that a nighttime stakeholders forum is created and a draft vision and statement is produced and consulted upon before a final strategy is developed. I do not believe any of this was done. Neither our residents nor anyone working at Soho housing has been involved in developing this strategy which, as your ward councillors will confirm, is a very important one for us. The amount of complaints we already receive about noise, anti-social behaviour, violence and crime in the Seven Dials area is considerable and the proposed strategy offers no hope for our residents that things will improve. It feels one sided ( for business only) unimaginative (no suggestions to reduce alcohol related venues and support other types of venture ) and designed to be delivered on a shoe string with no partnership working ( where are the thoughts on increased lighting, cleaning, different ways of working with the police etc).

In conclusion I would ask that this is withdrawn and a proper, full consultation process takes place to develop a strategy to manage the important but difficult balance between residents and business in the west end.

Yours sincerely

Barbara Brownlee

**Barbara Brownlee**  
**Chief Executive**

Pronouns: she/her



Soho Housing, 18 Hanway Street, London W1T 1UF  
[www.sohoha.org.uk](http://www.sohoha.org.uk)

A registered society within the meaning of the Co-operative and Community Benefit Societies Act 2014, No: 20784R. Registered with the Regulator of Social Housing as a registered provider of social housing, No:

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**RE: TRACT deputation to 26 February 2024 Culture and Environment Scrutiny Committee**

**Co-signatories:**

1. Kentish Town Road Action
2. Delancey Street Residents Association
3. Gloucester Crescent, Regents Park Terrace, Inverness Street and Oval Road Residents Association
4. Harmood, Clarence, Hartland Residents Association
5. Cresta House Residents Association
6. Brenda Gardner CCA
7. Camden Square Neighbourhood Association
8. Bonny Street RA
9. Mornington District Association
10. Jeffreys Street CAAC
11. Inkerman Area Residents Association
12. Primrose Hill RA

My name is Kate Gemmell, and I am chair of TRACT (Tenants and Residents Associations Camden Town) and I am also representing the views of the residents' groups listed at the top of my deputation.

This deputation is regarding agenda item 6: CAMDEN EVENING AND NIGHT-TIME ECONOMY REPORT (SC/2024/02). The document you are invited to scrutinise has been developed without proper process and consultation.

The Mayor of London has set out clear guidance on how to develop a Night-time Strategy. From the outset this has not been properly followed. A balanced approach is recommended.

Key stakeholders should include TRA's from all Camden wards if balance and consultation is indeed the aim of the Council.

In reaching out to TRA's borough wide we have not found any who were aware of the proposed Evening & Night-time Strategy.

TRACT represent Camden Town which is a cumulative impact area with huge numbers of visitors during the day and night. Residents are impacted day and night by the number of visitors and the number of late-night venues and bars. There is excessive noise day and night as well as crime and other issues, yet this strategy seeks expansion rather than

to improve the quality of experience for all.

Residents would like to see a more dynamic and diverse offering in the area with more family friendly options and investment in community spaces for our children and teenagers. This is also clear from the Citizens Assembly.

A much-needed balanced approach has been omitted from this strategy document which, of course, exposes all key stakeholders, particularly residents, to risks that could have been mitigated.

We would like the committee to recommend that the document as it currently stands is withdrawn to allow a fully review with all key stakeholders in the iterative process recommended by the London Mayor.

Yours sincerely,

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Kate Gemmell  
TRACT Chair

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## Covent Garden Community Association

### Deputation Request to 26/2/24 Culture & Environment Scrutiny Committee Agenda Item 6 – Camden Evening & Night-time Economy Report

I am David Kaner. I chair the CGCA's Licensing Sub-Committee and have been involved with Licensing since 2005. Our area of interest includes parts in both Camden and Westminster. The part of our area in Camden contains **361 licensed premises**, or **21% of all the licensed premises** in Camden.

Residents in our area, like other ENTE hotspots, suffer from the negative impacts of the ENTE. These impacts are usually not from what happens in the premises but what happens when people leave them. There can be noise, street fouling, litter and fights. People leaving also attract beggars, pedicabs and criminal activity.

The ENTE is therefore a topic on which the CGCA has some considerable experience.

The ENTE Strategy before you includes a Vision Statement and a set of themed actions. These are based on the results of a Citizen's Assembly which ended in March 2023.

The Strategy was published on 19/2/24 – over 11 months after the end of the Assembly. In between the end of the assembly and now there has been **no** discussion with **any** of Camden's Civic Society groups, including those which between us cover areas with more than 65% of the existing Evening and Night-Time Economy.

The Council did consult widely in advance of the Citizens Assembly but that was almost a year and a half ago. That consultation resulted in just 5 slides (see P83-87 of the Papers). They were presented at the end of a deck of 108 slides on the 1<sup>st</sup> day of the Assembly.

We are told that the Assembly recommendations are reflected in the final themes and actions. But they are **not**.

The Vision Statement in the Strategy **should** be consistent with the Mayor's 'Vision for London as a 24 hour City', with the Vision Statements discussed with the Citizens' Assembly and with Camden's own previous statements. All of these talk about the need for some sort of balance between the needs of businesses and residents. The Vision proposed is not consistent with these. It contains no sense of there being **a need for balance**.

If the Cabinet approves this Strategy then the Council will be able to ignore any impact that its decisions have on residents who live anywhere near the ENTE. The excuse will be "It is in-line with the Vision".

What about the rest of the Strategy?

The section on Community Safety and well-being that tells us that women feel unsafe, that Camden has a low level of noise complaints and that crime and ASB are falling.

It does not tell us that Camden doesn't collect data on noise complaints in the street, the type of noise which has the largest impact on residents in ENTE areas.

It doesn't tell us that the Police dispute the conclusions on crime and ASB and that 44% of **all** Camden's crime in the evening and night-time occurs in the ENTE hotspot areas.

This is not just my view. This is clear from the Cumulative Impact Review that was carried out by the Licensing Team.

The ENTE already results in high levels of both crime and disturbance to residents. This has real impact on people's lives. Go through Camden Town or walk along Charing Cross Road late on a Friday night to see it for yourself.

In the section on the theme of Liveability the Strategy states that the Citizens' Assembly said that: *The night-time economy impacts on residents' health: noise, lack of sleep and a clean environment.*

We agree. What is the proposed action to address this?

The only action in this section is to give people the opportunity to have exercise later at night. There is nothing suggested to help residents get enough sleep.

Perhaps other actions in the list on P23 will help? The only ones which could be seen to link to this issue are a Licensing Charter that has low expectations and no teeth and a review of the management of ENTE hotspots that is not a priority and doesn't promise that any action will result. Neither will address the issues we already face.

The Strategy tells us other things that the Citizens Assembly wanted to see. These include places for young people to meet, activities that are not focussed on alcohol, that cost less and are operated by local businesses that are diverse, grassroots venues, in an area that feels safe.

This is not what this Strategy will deliver. It, and the Licensing Policy proposal which has been withdrawn for further discussion, would **intensify** the night-time economy in Camden **without addressing** any of the existing issues. It will be easier to operate alcohol-led venues until later at night, and open new ones, in areas that are already saturated with them.

The report before you confirms this. P14 of the Committee Papers lists the risks in adopting the Strategy. One of the identified risks is:

*Insufficient public engagement about possible contentious licensing or intensification of evening & night-time hotspots could lead to reputational damage.*

If the Cabinet adopts this Strategy it will **intensify** the evening and night-time hotspots where residents are already suffering. It will have a real impact on the health and well-being of residents as well as increasing crime and public nuisance.

There are some good ideas in the Strategy, they just don't go far enough and they do not address the root causes of problems in the Evening and Night Time Economy.

As residents we want to "make Camden a welcoming, safe and inclusive place to spend time in the evening and night-time", for us and for others. The Strategy before you is not how to go about it.

**Please ask Cabinet to delay the process of approving the Strategy to allow for consultation on the Vision statement and on the detail of the Strategy with all the Stakeholders.**

This is what the GLA's Guidance on developing an ENTE Strategy says should have been done - and sequentially, not all at once. It is the failure of Camden to follow this process that has resulted in so many different residents' groups becoming concerned about it.

This Strategy is intended to be in place for 5 years. Getting it right for the people of Camden is more important than getting it done fast.

As well as the **CGCA** this Deputation is supported by:

**Bloomsbury Association**   **Bloomsbury Residents Action Group**   **Charlotte Street Association**

**Seven Dials Trust**   **South Bloomsbury Tenants and Residents Association**

## What has happened to the idea of **balance**?

### From good night to great night – A Vision for London as a 24 Hour City – Mayor of London 2017

Likewise, **a balance must be struck** between work, rest and play for London's eight million residents. No matter what time we go to bed, we all need good sleep. Nothing we do must compromise that basic right.

### Camden Evening and Night-Time Economy Report – Strategic Context *(Committee Bundle P7)*

We will **seek to balance** the needs of visitors and businesses with those of local people who may be negatively impacted

### Camden's Evening and Night-Time Citizens' Assembly Report 2023 – Draft Vision Statements *(Committee Bundle P60)*

Our vision for the evening and night-time is one where the people, places and spaces that give Camden its unique and vibrant night-time character can be creative, rebellious and can flourish. People of all ages and backgrounds feel welcomed, safe and that they belong and **the wellbeing of those who live or work in Camden is protected.**

Our vision for the evening and night-time economy is one that celebrates creativity, embraces diverse spaces, and places, and welcomes people of all ages and backgrounds. We strive to **enhance the quality of life for everyone** by providing a safe and vibrant atmosphere that showcases the character and heritage of our community

We are Camden, and we will work together to enable a night-time experience that has something for everyone, continues to lead iconic cultural production **whilst being a safe, respectful and enjoyable experience.** A night-time that everyone belongs in, whether living, trading, working or visiting.

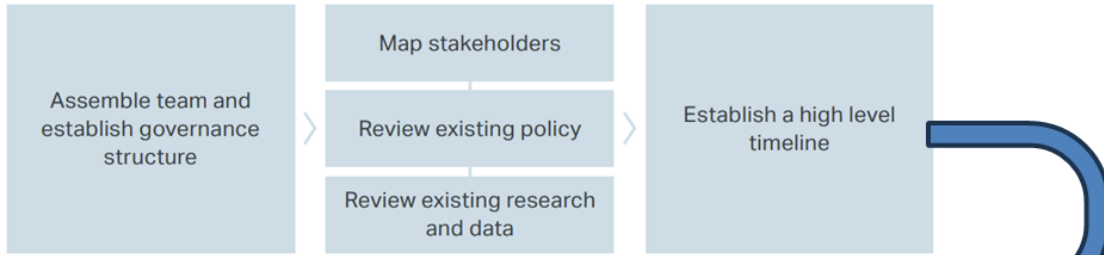
### Camden ENTE Strategy Vision Statement – as submitted *(Committee Bundle P21)*

Guided by our residents, businesses, visitors and workers, we will make Camden a welcoming, safe and inclusive place to spend time in the evening and night-time.

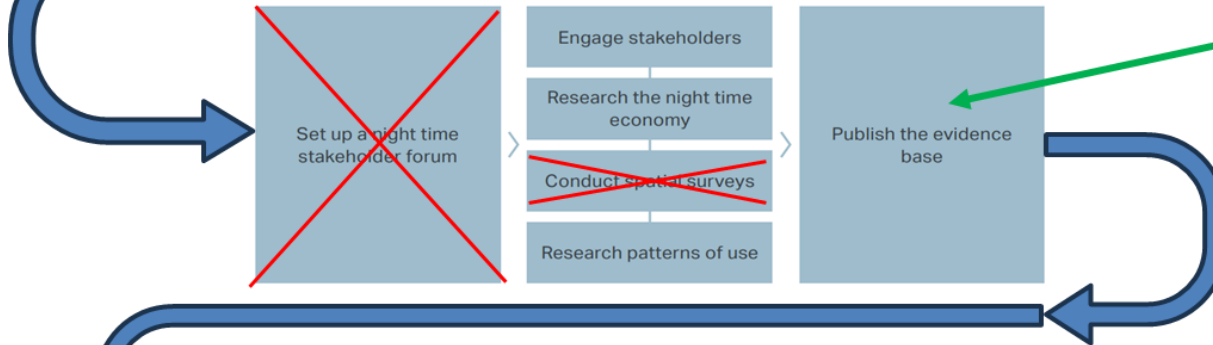
We believe that by working together we can do more to support our creative and rebellious culture, nurture and protect community heritage, grow the economy and create good work opportunities which are accessible to all.

# Guidance on Developing A Night-Time Strategy – Mayor of London December 2020

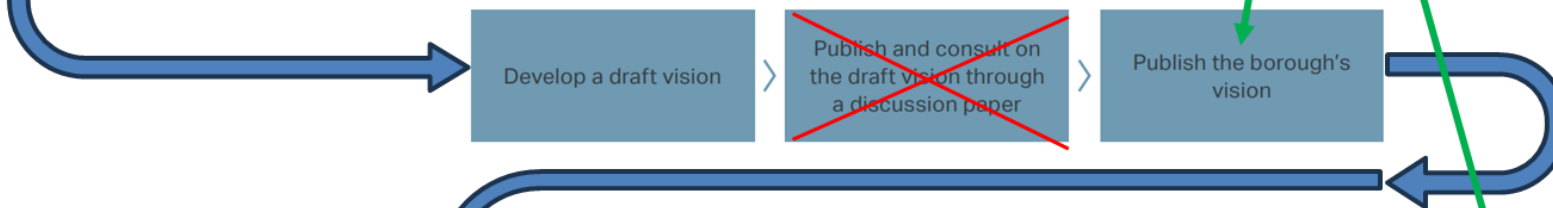
## Stage 1: Project inception



## Stage 2: Establishing a baseline and building an evidence base



## Stage 3: Creating a shared vision and objectives



## Stage 4: Developing a strategy and action plan



Camden is doing all these steps at once and only at the END of the process

**RE: Castlehaven Community Association - deputation to 26 February 2024 Culture and Environment Scrutiny Committee**

Good evening. My name is Tricia Richards, CEO of Castlehaven Community Association for the past 5yrs. Castlehaven lies between Kentish Town Road and Chalk Farm Road. Castlehaven is surrounded by several council-owned housing estates and properties whose interests we aim to serve. We also manage two community parks to the north and south of our buildings.

Residents in the area are already badly affected by the evening and night-time economy - particularly by revellers and drinkers – especially late at night - and by the vomit, defecation, urination and litter left behind in our parks and the surrounding streets by night-time visitors to the area, - an area which some Councillors have in the past referred to as ‘The Strip’ or ‘The Wild West’.

In reviewing the output from the Citizens assembly there are several ideas that we would support and that would benefit our residents and area. However, in reading the ENTE strategy being put to you this evening we are shocked that resident needs are being ignored and the focus is primarily on business and expansion.

It is not a safe area for residents. I have had many conversations with the police about resident safety and they are as exasperated as I am. We at Castlehaven, and our residents, were shocked and appalled when we learned of the draft licencing policy (currently withdrawn) at the suggestion that pubs and other venues may be encouraged to extend their late hours by a change in framework hours and the loss of what limited protections we have with the possible removal of the cumulative impact areas.

Many of those leaving local pubs at 2 or 3am may crash out in our parks or - even worse - continue to party within them. How can this be balanced with the strategies desire for diversity and more use of our community spaces in the evening and night-time?

This will only make Camden Town less safe for residents. The proposal before you can only make a dire situation worse. Many of the proposed actions can only be bad for local people, but the fact that they are threatened with having these changes thrust upon them with no notice, no proper consultation, and no thought for the consequences, makes us worry for the future of local democracy in Camden.

If such an unpopular move can happen without consulting those most badly affected, what is next? On behalf of the residents who live all around us, and especially those who live and work in the Camden Town, Chalk Farm, Kentish Town areas, we ask you to consider the consequences of the proposed changes.

We also ask that you recommend the ENTE Strategy be withdrawn until it can be reviewed with key local stakeholders and a revised document can be agreed on. For the sake of the wellbeing of your constituents and those who made it possible for you to sit as Camden Councillors please listen to our views.

Thank you.  
Tricia Richards  
CEO

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