

Sarah Williams

Subject: FW: *Withdrawal Of Police Reps* - Application for TEN, 29-30 High Holborn WC1V 6AZ, Application NEW\113102

Attachments: TLLL_Proposed Conditions V6.docx; floor plan Red line and seating and table areas(1).pdf; Police Representation for Ten London, 29-30 High Holborn WC1V 6AZ.pdf

From: [REDACTED]
Sent: 27 January 2023 20:37
To: Samina Khan <[REDACTED]>; Karly Wyatt <[REDACTED]>; Licensing Committee <[REDACTED]>; Michelle Anderson <[REDACTED]>
Subject: *Withdrawal Of Police Reps* - Application for TEN, 29-30 High Holborn WC1V 6AZ, Application NEW\113102

[EXTERNAL EMAIL] Beware – This email originated outside Camden Council and may be malicious Please take extra care with any links, attachments, requests to take action or for you to verify your password etc. Please note there have been reports of emails purporting to be about Covid 19 being used as cover for scams so extra vigilance is required.

**RE: Application NEW\113102
TEN, 29-30 High Holborn WC1V 6AZ**

Dear Camden Council and James,

Police and the Applicant for Application for TEN, 29-30 High Holborn WC1V 6AZ, Application NEW\113102 have now agreed terms.

Please therefore take this email as notice of my withdrawal of the Police Representations on the proviso the agreed terms are appended to any Licence granted.

Attached:
Applicants Proposed Conditions (agreed with Police)
Applicants Floor Plan (agreed with Police)
My original Representation

For clarity both parties have agreed to the following:

CONDITIONS AGREED:

- 1) The premises will install and maintain a comprehensive CCTV system covering all parts of the premises as per the minimum requirements of the Metropolitan Police Service. Further:
 - (a) All entry and exit points will be covered enabling frontal identification of every person entering in any light condition.
 - (b) The CCTV system will continually record whilst the premises is open for licensable activities and during all times when customers remain on the premises.
 - (c) All recordings will be stored for a minimum period of 31 days with date and time stamping.
 - (d) Viewing of recordings will be made available immediately upon request of the Metropolitan Police Service or Responsible Authority Officer throughout the preceding 31 day period, providing the request complies with the Data Protection Act or any other Primary Legislation

- (e) All searches will be recorded on the CCTV system
- (f) There will be external CCTV (installed and operated) which monitors the queue.
- (g) A staff member from the premises who is conversant with the operation of the CCTV system will be always on the premises when the premises are open. This staff member will be able to provide Metropolitan Police Service or Authorised council officer copies of recent CCTV images or data with the absolute minimum of delay when requested, providing the request complies with the Data Protection Act or any other Primary Legislation.
- (h) The CCTV system will be checked daily to confirm that it is working.
- (i) The CCTV system will be maintained bi-annually and details of maintenance will be made available upon request to the council.
- (j) The licence holder will always ensure that there is a sufficient supply of portable media (USB sticks, DVDs or similar) to be provided to the Metropolitan Police Service in the event of copy CCTV footage being requested.
- (k) The recording equipment and data storage devices will be kept in a secure environment and fitted with security functions (such as passwords) to prevent recordings being tampered with.
- (l) The system will be register with the Information Commissions Office.
- (m) The system will abide by the Surveillance Camera Code of Practice.
- (n) if the any Camera on the system or the system itself becomes inoperable, then within 48 hours the Metropolitan Police will be notified along with an estimate given of the repair timescale.

2) Where the premises are open for licensable activities on any day after 22:30 from 21:00 hours, a minimum of one (1) SIA Door Supervisors shall be employed per twenty-five (25) customers at the premises until 30 mins after close. Further when engaged, all SIA licensed door supervisors will:

- a) wear their SIA badges;
- b) be equipped with closed circuit radios;
- c) be equipped with "body worn video" camera devices that will record both sound and images. All recordings will be stored for a minimum of 31 days with date and time stamping. Viewing of recordings will be made available immediately upon request of the Metropolitan Police Service or Responsible Authority Officer throughout the preceding 31 day period, providing the request complies with the Data Protection Act or any other Primary Legislation; and
- d) when stationed outside the premises, wear high visibility jackets or vests.
- e) ask customers not to stand around talking in the street outside the premises and ask customers to leave quickly and quietly.
- f) will check the toilets every 30 mins and these checks are to be documented, this condition is of nil effect if the toilets are staffed by a toilet attendant.
- g) Sign in in a register at the start of their shift and out at the end of their shift. In this log they will, confirm their full name, date of Birth, SIA registration number, and Contact details (phone number and email address).
- h) remain on duty for half an hour after the close the venue to ensure all patrons are dispersed from the area.
- i) monitor any patrons who are in the smoking area.
- j) ensure when there is a confrontation between guests and one or more party is ejected, they must take action to ensure there is no further confrontation outside. Further SIA Door Supervisors will monitor those involved until they are satisfied the incident will not escalate.
- k) will have control of clickers ensuring that the venue is not over capacity at any time. Smokers must be included in the clicker count.
- l) will escort out from the premises immediately any patron who covers their head with a hoodie, hat or any other item of clothing.

3) When SIA are employed at the premises the licence holder will:

- a) keep a photographic copy of each SIA door supervisor's badge, this will be produced upon request to the Metropolitan Police.
- b) Employee a minimum of one (1) female SIA door supervisor will, where practicable possible; where this is not possible the licence holder will confirm the reasons in an incident report.
- c) inform the police if they change the company that provides SIA Door Supervisors.

- 4) There shall be always a personal licence holder on duty on the premises when the premises are authorised to sell alcohol.
- 5) No noise shall emanate from the premises nor vibration be transmitted through the structure of the premises which gives rise to a nuisance.
- 6) Notices shall be prominently displayed:
 - a) at all exits requesting patrons to respect the needs of residents and leave the area quietly.
 - b) all entrances and exits advising customers that CCTV is operating at the premises and will be always clearly legible when the premises conducts licensable activities.
 - c) at the entrance and exits stating that the premises has a zero tolerance towards drugs and weapons.
 - d) throughout the premises warning of potential criminal activity such as theft that may target customers shall be displayed.
 - e) outside the premises indicating the licensable hours and opening hours permitted under the premises licence.
 - f) throughout the premises advising customers that the premises operates a Challenge 25 proof of age scheme.
- 7) A Challenge 25 proof of age scheme shall be operated at the premises where the only acceptable forms of identification are recognised photographic identification cards, such as a driving licence or passport.
- 8) A log shall be kept at the premises, and made available on request to an authorised officer of the Council or the Metropolitan Police Service, which will record the following:
 - a) all crimes reported to the venue
 - b) all ejections of patrons
 - c) any complaints received concerning crime and disorder
 - d) any faults in the CCTV system or searching equipment
 - e) any refusal of the sale of alcohol
 - f) any visit by a relevant authority, Metropolitan Police Service, London Ambulance Service or London Fire Brigade.
 - g) any CCTV images seized by Metropolitan Police Service or other relevant authority or supplied by license holder on request, including name of person requesting and name of person supplying
 - h) any attempted underage alcohol purchases
 - i) any acts of violence or criminal damage
 - j) any theft or attempted theft of alcoholic drinks
- 9) The premises licence holder will ensure that all staff are trained commensurate with their roles at the premises including:
 - a) The Licensing Act 2003, responsibilities in supporting the four key objectives.
 - b) Crime Scene Preservations
 - c) Welfare and Vulnerability Engagement (WAVE) training
 The premises licence holder will ensure that records of staff training are kept and made available to Responsible Authority Officers on request.
 The premises licence holder will ensure that refresher training is provided every 6 months.
- 10) The premises licence holder shall provide and maintain a dedicated telephone number of the designated premises supervisor for use by any responsible authority or any person who may wish to make a complaint during the operation of the licence. This shall be provided upon request to the Licensing Authority and Metropolitan Police Service.
- 11) Deliveries of materials necessary for the operation of the business shall be carried out at such time or in such a manner as to prevent nuisance and disturbance to nearby residents.
- 12) The premises licence holder will devise and maintain the following policies:
 - a) Dispersal

This policy will include but not limited to:

- i. How patrons leaving the premises will be directed away from the premises;
- ii. How patrons will be informed of the services of taxi and private hire operators;
- iii. What staff will be responsible for supervising those leaving the premises and how they will supervise such persons;
- iii. Any 'wind' down periods;
- iv. Methods to prevent re-entry to the premises;
- v. How bottles and glasses will be prevented from being removed from the premises.

b) Security

This policy will include but not limited to:

- i. Clear expectations of staff roles (including the DPS, managers/supervisors and door supervisors);
- ii. Staff training regarding identification of suspicious activity and what action to take;

c) Drugs, this will be a zero-tolerance policy with regard to the use/possession of controlled drugs and psychoactive substances

Including but not limited to:

- i. Dealing with patrons suspected of using drugs on the premises;
- ii. Scrutiny of spaces including toilets or outside areas;
- iii. The handling of items suspected to be illegal drugs or psychoactive substances.
- iv. Steps taken to discourage and disrupt drug use on the premises
- v. Steps to be taken to inform patrons of the premises drug policy/practice.

Any changes to these documents will be notified to the Metropolitan Police within 48 hours of making the change.

- 13) When the premises is open past 00:00 they shall operate a last admittance policy for patrons whereby the last patron shall be admitted to the premises 90 minutes before closing time.
- 14) Windows and doors shall be closed at 22:00 when live or recorded music is playing except for the immediate entrance or egress of persons to or from the premises.
- 15) No person under 18 years of age shall be admitted to the premises or allowed to remain on the premises after 21:00 except in the company of an adult.
- 16) No patron temporarily allowed to leave to smoke, on High Holborn, will be allowed to take any glassware or drinking vessel from the premises whether empty or containing any beverage. This includes patrons using the smoking area.
- 17) In the event that a serious assault is committed on the premises (or appears to have been committed) the management will immediately ensure that:
 - a. The police (and, where appropriate, the London Ambulance Service) are called without delay;
 - b. All measures that are reasonably practicable are taken to apprehend any suspects pending the arrival of the police;
 - c. The crime scene is preserved to enable a full forensic investigation to be carried out by the police; and
 - d. Such other measures are taken (as appropriate) to fully protect the safety of all persons present on the premises.
- 18) No patrons, DJ's, performers, (along with their guests and entourage) or guests of staff will be admitted (or re-admitted) to the premises after 21:00, or when a promoted event is running unless:
 - a) They have had their ID scanned on entry;
 - b) They have been physically searched in accordance with the Premises' entry policy which will include a full bag search and;

- c) The searching will be supplemented using two functional metal detecting wands operated by a male and (so far as reasonably possible) female door supervisor dedicated to that duty either until the end of permitted hours or until there are no further admissions. Where a female Door Supervisor is not available this shall be logged.
- d) They comply with the following dress code; individuals wearing hats and/or hoodies shall be refused entry until such items are removed from the customer's head.

Further:

- e) No patron carrying visibly open or sealed alcohol vessels shall be admitted to the premises at any time that the premises are open for any licensable activities.
- 19) The licence holder will conduct a vigorous vetting procedure for any Private Party, Promoter (and their known associates), DJ or artist or outside agent. This vetting must be documented and should consider any open-source material, and reference checks. If there are any concerns these should be communicated to the Metropolitan Police at least 14 days before the event.
 - 20) Mr Antony HOXHA and Wale OGUNYE are not to be employed in any capacity on or at the premises or involved in the management of the premises either directly or indirectly.
 - 21) Mr Antony HOXHA and Wale OGUNYE are not to enter the premises at any time in any capacity whilst licensable activities are taking place.
 - 22) The area in Fulwood Place, shall be clear of customers by 23:30. Further when the area is in use, there will be one (1) SIA Door Supervisor dedicated to this area. After this time any patrons smoking must do so on High Holborn.
 - 23) No more than eight (8) customers shall be permitted to smoke outside the premises on High Holborn at any one time. The premises will have a designated smoking area located on the terrace in front of the premises on High Holborn. This policy will be in operation whenever this area is in use.
 - 24) Non-alcoholic beverages shall be available throughout the premises opening hours.
 - 25) All patrons will be off the premises no later than 60 mins after the end of licensable activities.
 - 26) The areas marked on the plan will be laid out with chairs and tables and alcohol will be supplied by waiter service to customers at their table

TIMES AGREED:

Live / Recorded Music / Late Night Refreshments:

Sunday to Wednesday 0300am

Thursday to Saturday 0300am

Alcohol that have the following finishing times:

Sunday to Wednesday 0300am

Thursday to Saturday 0300am

Removal of the proposed New Year's Eve Hours Exemption

Kind regards,

Joel

PC Joel Francis [REDACTED] – Camden Police Licensing Team

[REDACTED]
[REDACTED]
[REDACTED]



CENTRAL NORTH

Policing Camden & Islington

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From: James Hoffelner [REDACTED]
Sent: 24 January 2023 14:32
To: Francis Joel P.E - CN-CU [REDACTED]
Subject: Re: FW: TEN Ldn

Hello Joel,

The conditions I believe reflect the three points you have raised.

Sent from Proton Mail for iOS

On Tue, Jan 24, 2023 at 15:26, [REDACTED] wrote:

Good afternoon James,

Thank you for the latest amendments and proposals.

I have had a look at the attached Conditions V6 and the floor plan and can confirm that we would withdraw our Representation on these terms.

So to confirm:

- 3am termination for all licensable activities
- 60 minute 'drink up' time
- No NYE exemption

Once you get back to me to confirm this is correct I will notify Camden Council and yourselves with a Withdrawal Notice,

Sincere thanks for the compromises and time taken to discuss this application with us,

Joel

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Proposed Conditions

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 - d) when stationed outside the premises, wear high visibility jackets or vests.
 - e) ask customers not to stand around talking in the street outside the premises and ask customers to leave quickly and quietly.
 - f) will check the toilets every 30 mins and these checks are to be documented, this condition is of nil effect if the toilets are staffed by a toilet attendant.
 - g) Sign in in a register at the start of their shift and out at the end of their shift. In this log they will, confirm their full name, date of Birth, SIA registration number, and Contact details (phone number and email address).
 - h) remain on duty for half an hour after the close the venue to ensure all patrons are dispersed from the area.
 - i) monitor any patrons who are in the smoking area.
 - j) ensure when there is a confrontation between guests and one or more party is ejected, they must take action to ensure there is no further confrontation outside. Further SIA Door Supervisors will monitor those involved until they are satisfied the incident will not escalate.
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 - h) any attempted underage alcohol purchases
 - i) any acts of violence or criminal damage
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licence. This shall be provided upon request to the Licensing Authority and Metropolitan Police Service.

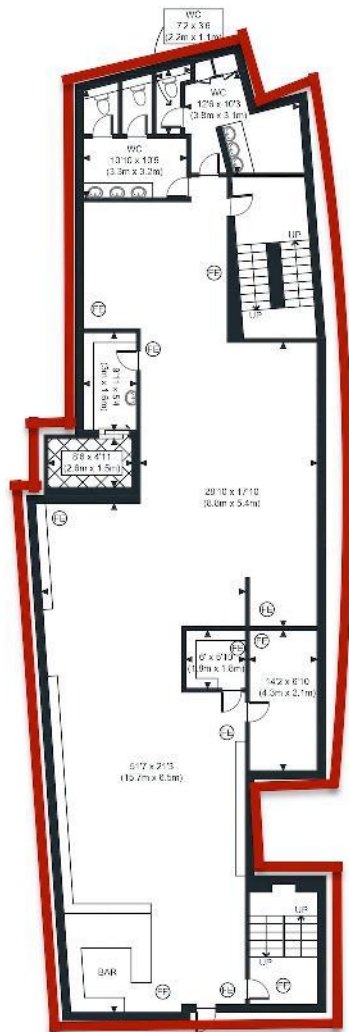
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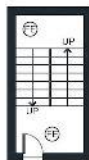
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- 26) The areas marked on the plan will be laid out with chairs and tables and alcohol will be supplied by waiter service to customers at their table



BASEMENT
GROSS INTERNAL
FLOOR AREA 2226 SQ. FT.

GROUND FLOOR



GROUND FLOOR
GROSS INTERNAL
FLOOR AREA 97.50 SQ. FT.



(EL)	Emergency Light
(FE)	Fire Extinguisher
(SA)	Smoke Alarm
(FB)	Fire Blanket
(FL)	Flood Light

(FE) FIRE EXTINGUISHER

APPROX. GROSS INTERNAL FLOOR AREA 1269 SQ. FT. / 116.50M		High Holborn
Disclaimer: Floor plan measurements are approximate and are for illustrative purposes only. While we do not doubt the floor plan accuracy and completeness, you or your advisors should conduct a careful, independent investigation of the property in respect of tenancy variations.		
Date:	12/06/22	
		photaplan



**METROPOLITAN
POLICE**

TOTAL POLICING

Camden Licensing Authority

Town Hall Extension
100 The St
London

WC1H 0AA

PC Joel Francis
EK - Camden Borough

Licensing Unit
Fenchurch Town Police Station
100 The St
London
WC1H 0AA

Telephone: [REDACTED]

Email: [REDACTED]

Our ref: **NEW\113102**

Saturday 31st December 2022

Dear Sir/Madam

RE: Application NEW\113102
TEN, 29-30 High Holborn WC1V 6AZ

With reference to the above Application, the Metropolitan Police Service (MPS) wishes to make a Representation.

The Applicant and Police Licensing have been unable to reach final agreement on the termination times for licensable activities.

Within the Licensing Act 2003 and contained in the notes or guidance for the Licensing Act 2003 it is the responsibility of the Police and Local Authority to promote the prevention of Crime and Disorder, promote Public Safety, prevent Public Nuisance and protect Children from Harm.

I certify that I have considered the application above on its own merit and my Representation is based on the likelihood of the grant of the application being detrimental to Camden Council's Licensing Objectives.

Looking at Case law during the case of Daniel Thwaites PLC v Wirral Magistrates' Court and Others, The Honourable Mrs Justice Black said:

“Drawing on local knowledge, at least the local knowledge of local licensing authorities, is an important feature of the Act’s approach. There can be little doubt that local magistrates are also entitled to take into account their own knowledge but, in my judgment, they must measure their own views against the evidence presented to them. In some cases, the evidence presented will require them to adjust their own impression. This is particularly likely to be so where it is given by a Responsible Authority such as the police.”

This case is sometimes misconstrued as requiring decisions to be based on ‘real evidence’, and that conditions cannot be imposed until problems have actually occurred. This is wrong. The purpose of the Act is to prevent problems from happening. Decisions can and should be

based on well-informed common sense. The case recognises that Responsible Authorities are experts in their fields and that weight should be attached to their representations.

Source:

www.gov.uk/government/publications/alcohol-licensing-using-case-law

Introduction

An application with reference W1500000 has been made for a new premises licence to operate for 100 High Holborn WC1A 1AA

The applicant already conducts licensable activities at this premises using RMLIC000000

Before discussing this application with the applicant's Legal Team it is understood that there will be surrender of RMLIC000000 upon receipt of the new premises licence.

The applicant is hoping that the new premises licence will better reflect his business model and provide more appropriate and relevant conditions in relation to the licensing objectives.

This application proposes a significant daily increase in hours for licensable activities.

Another part of the application is to seek permission to allow licensable activities within an outside bar area measuring 10m x 10m. This is to be installed on Mulwood place.

Background

The applicant became the Local Licensee and Designated Premises Supervisor (DPS) following a Review of the Premises Licence in 2011 when the premises was called Club 100.

A judgment was made following an appeal process and found that the premises could retain their premises licence in light of changes made and offered by the applicant.

Police licensing are keen to work positively with the applicant in support of promoting the licensing objectives and have looked at this new application with fresh eyes.

Unique Application Issues:

One concern to police licensing is the prospect of a nightclub being open and serving alcohol until 1am each day of the week when nightclubs do present a higher risk of disorder. The extensive proposed conditions will allow a part in seeing customers safe but customers will at some point leave the premises to take their walk home and this will present issues on the street or at transport hubs.

‘..in response to their experience of policing the network to date, British Transport Police recently warned of dangers to intoxicated lone travellers from sexual predators who might exploit their vulnerability whilst using the service, and that personal safety risks taken by intoxicated persons could cause serious injuries to themselves and others.’

Sources:

www.ias.org.uk

[Driving factors of alcohol-related crime Briefing Note](#)

[Simpson, F. 2018. Don't fall asleep on the Night Tube: Police Chief's warning to lone travellers](#)

In considering this application I have assessed current policing resources and the ability for police to respond to incidents if they arise. The premises sits within the policing ward of

Holborn and Covent Garden – outside the Curialtië I – act – rea – Metcall – Des – atch – will – ri – aril – be tas – ing – olice O – icers – arading out o – entish Town – olice Station to this location – entish Town – olice Station is – – – miles awa – or a – – – inute car – urname – on Google Ma – s –

Loo – ing again at Case Law – during the case o – ast Lindse – District Council – bu Hani – a Zara’s Restaurant) 2016 – co – enting on the wa – co – ittees and courts should a – roach the – ro – otion o – the licensing ob – ectives – Mr – ustice – a – said –

“[T]he prevention of crime and disorder requires a prospective consideration of what is warranted in the public interest, having regard to the twin considerations of prevention and deterrence.”

Source:

www.gov.uk/government/publications/alcohol-licensing-using-case-law

In – ro – ding a sound basis – or – re – ention and deterrence it is i – ortant to – how so – e o – the identified ris – s in running a nightclub – vertical drin – ing establish – ents such as night clubs ha – e been identified as causes o – e – cessive or otherwise – robe – atic consu – ction – in – articular – where drin – ing is an end in itsel – rather than an acco – animent to other acti – ities such as ha – ing a – eal while seated at a table – This – robe – atic drin – ing when – aired with other – actors such as – crowding – oor bar la – out and tra – ic – low – inade – uate seating or incon – enient bar access – di – lighting – di – lighting reduces the ca – acit – or – or – al surveillance b – re – ises guardians – – – airs co – – unication and increases the li – elihood o – collisions – noise – loud – usic – a – further i – air co – – unication between custo – ers – re – enting the de – escalation o – r – actious encounters – oor – entilation or unclean conditions – lac – o – a – ailabilit – o – ood – a – mer – issi – e – en – iron – ent that turns a blind e – e to anti – social beha – our – unters with a histor – o – aggression and who binge drin – aggression – inti – idation b – securit – sta – oor access to late night trans – ort – aggression – content in – usic and a ‘rowdy atmosphere’ are all ris – factors – which – a – e night clubs – ore at ris – o – disorder than other licensed businesses –

SOURCES:

[The Portman Group, 1998. Keeping the Peace: A Guide to the Prevention of Alcohol-Related Disorder, revised edition](#)

[Graham, K. and Homel, R., 2008. Raising the bar: Preventing aggression in and around bars, clubs and pubs.](#)

[McFadden, A.J., Young, M. and Markham, F. 2015. Venue-level predictors of alcohol-related violence: An exploratory study in Melbourne, Australia. International Journal of Mental Health and Addiction, 13\(4\), p. 506](#)

[Graham K, Bernards S, Osgood DW, Wells S. Bad nights or bad bars? Multi-level analysis of environmental predictors of aggression in late-night large-capacity bars and clubs. Addiction 2006](#)

The Ca – den State – ent o – Licensing – olic – obser – es the – ollowing –

‘Statistics show that nightclubs and late night dance venues generally contribute far higher levels of alcohol related violence per premises than other licensed venues. As a result, we expect nightclub and late night dance venue operators to pay particular regard to the prevention of crime and disorder objective when preparing their operating schedule.’

Source:

[Camden Statement of Licensing Policy 2022-2027 Page 55](#)

Loo – ing at our own – olice licensing cri – e trac – er – or – iolent cri – es in Ca – den the – ollowing has been disco – ered –

- – – – o – iolent cri – es at licensed – enues too – lace within nightclubs in Ca – den in – – – – or – – – re – orts out o – – –
- – – – o – iolent cri – es at all licensed – enues ta – es – lace between – – – – a – – or – – – re – orts out o – – –
- – – – o – iolent cri – es ta – es – lace within night clubs in Ca – den between the later hours o – – – – a – – or – – – re – orts out o – – –

The applicant has indicated a wish to allow vertical drinking where it is restricted on the current licence. The current restriction on vertical drinking is a well made a positive contribution towards the safety of the premises. Similarly, the lower termination time for licensable activities is likely to have reduced incidents too.

An increase in the licensable hours for this premises should be carefully considered against the risks discussed so far.

The application plans also to propose the use of an outdoor space situated at the rear of the premises on Mulwood place. This area could be problematic as it is used by other residents and businesses likely to be adversely affected by nuisance but also disorder from the premises. Police licensing are keen this entrance point is not used as a soft entrance into the premises to avoid the more robust main front entrance. Police have therefore recommended a sign presence in this area should it be authorised. We would want this area limited to customer smoking and would object to alcohol being consumed here.

Recent dialogue with Council colleagues has revealed the applicant has been served a notice by Highways due to the installation of another structure on the Council passage at the back without permission.

Partnership and Engagement

Police Licensing hosted two online meetings with the applicant's Legal Team to discuss the application and Operating Schedule.

Unfortunately, the applicant was not present at the meetings and although not a requirement, it would have assisted as the applicant is the Designated Premises Supervisor (DPS) and the person Police Licensing will be directly liaising with during the proposed operation. Knowing the proposed hours are some of the latest in Camden, we would have expected the applicant to be available to explain their position and address any concerns or questions directly over what their business model will be.

The two meetings held with the Legal Team were productive in terms of setting out proposed Conditions. However, there could not be an agreement on proposed hours for licensable activities – especially the sale of alcohol. Although the Legal Team provided an amended termination time, this was not agreed and still beyond the recommended maximum finish time for alcohol sales.

The Legal Team and Police Licensing will continue to pursue an agreement.

Research and Intelligence

Also informing our assessment of this application are the findings by the IAS Institute of Alcohol Studies. These research projects provide informed briefings on what drives crime and disorder in the night time economy without the bias of police findings which stress the need to reduce overall demand and to assist poor resourcing.

The Royal College of Practitioners (RC) paper 'Alcohol and Violence' described the problem of alcohol-fuelled violence in public settings.

'Half of all incidents of alcohol-related violence in England and Wales take place in or around pubs and clubs. Amongst 18–24-year-olds, twice as many women and nearly three times as many men classified as "bingedrinkers" have participated in a violent crime or group fight in a public place than those classified as "regular" drinkers. Such bingeing is encouraged by irresponsible drinks promotions (e.g. happy hours). Insufficient transport services, poor street

lighting and overwhelmed or inappropriately targeted police resources also increase the likelihood of violence.'

Source:

www.ias.org.uk

Faculty of Public Health of the Royal Colleges of Physicians of the United Kingdom. Alcohol and Violence: Briefing Statement

Recent Noteworthy Incidents:

Cri e re ort             

 ro         on Sunday    th October      there was a call to  olice in relation to a suspected attempted stabbing between customers. Three  ale suspects were eventually arrested on suspicion of  ra . Subsequent investigation and CCTV enquiries  ound that a  ale was  unched inside the nightclub before  ro ed  atel  three  ale suspects who then waited for the  ctive to leave the club. As the  ale later left the club the same suspects then restarted the altercation. Staff were assaulted in the  idst of the  ighting whilst trying to separate the  arties involved. No bottles or weapons were seen in the CCTV footage but one of the  ale suspects grabbed the security cordon rope as a weapon. This incident took place during a temporary event notice at the premises for a promoted event.

Cri e re ort             

 ro         on Saturday    th May      there was another incident where  olice were called to a  ight involving up to seven people outside Ten London at     .  olice attended the scene and were immediately redirected by security towards the direction of Cullwood place where the suspects involved had retreated. However, this is a dead end and so some of the suspects tried to climb over a wall to escape. Two males were eventually arrested. Subsequent investigation and CCTV enquiries  ound that the altercation started when staff challenged a suspect who tried to take a drink outside. This ignited a physical assault against the staff member and the suspects associates also joined in and threw punches. Other staff members went to assist but the  ighting spilled out onto the street. The suspects launched missiles of glass bottles towards security staff. One member of staff had held on to a belt throughout an incident of disorder and wrapped it around his wrists to use as a weapon. The same member of staff was also seen to  ick one of the suspects in his chest aggravating the situation further. The belt was then used as a weapon on one of the suspects. The SI Integrity Team were involved on this incident but police licensing and the applicant provided details of the SI involved. Advice was also issued in relation to CCTV timings which were incorrect at the time.

Conditions Proposed By Applicant:

The applicant has made some amendments to those Conditions proposed in the application and introduced some additional conditions following discussions between parties.

These include conditions such as ensuring substantial food and non-alcoholic beverages shall be available throughout the premises opening hours, limiting the vertical drinking to a particular part of the premises, limiting the number of servers etc.

The extensive Conditions are helpful and desirable a good starting point. The applicants team have taken great care to  or   conditions consistent with advice given in the Camden State of Licensing Policy.

Police licensing are grateful to the applicant for the Conditions being offered. However, the applicant can better mitigate against crime and disorder concerns by reducing the amount of hours being proposed.

Times Proposed By Applicant:

ROM LIC currently has the following termination times for licensable activities

- **Live / Recorded Music / Late Night Refreshments:**
Sunday to Wednesday 0000a
Thursday to Saturday 0000a
- **Alcohol that have the following finishing times:**
Sunday to Wednesday 0000a
Thursday to Saturday 0000a

Police resources become heavily drained from midnight onwards. Based on crime reports and crime classifications we can see there is an increasing trend of violence in Camden during later hours.

For clarity, the MPS supports Camden Council's Licensing Policy with regards to Recorded Entertainment Hours. However, we accept the police should be carefully considered on a case by case basis.

Our proposal therefore is to agree to an increase in hours but to compromise at 3am for ALL licensable activities. This does not include the drinking time of thirty minutes beyond the termination time which is standard practice.

The effect of granting the proposed hours in this area rather than the area proposed would be to change this part of Holborn into a **very late night area** running into the early morning hours the following day and impacting the start of the working day trade. This has adverse impacts on crime, disorder and ASB and is inappropriate for the locality.

It is clear that customers will find it increasingly difficult to leave their workplaces from the area as the hours get later. London Underground services will be limited but there are 24-hour bus services. Of concern is an increase of late night economic ASB on the bus network especially during the early hours of the morning when services are being used by early morning workers and shift workers.

A Balancing Exercise

A decision to license premises is a balancing exercise between equally valid but conflicting interests. Having spoken to the applicants' Legal Team and acknowledging the regular applications for temporary event notices, it is clear the current premises Licence restricts their commercial ambitions.

Balance can be achieved by limiting the proposed hours to mitigate the likelihood of crime and disorder and public nuisance.

The balance is referred to in the Camden Council Statement on Licensing Policy.

'We recognise the wish of local people to live and work in a safe and healthy environment, and the importance to the local economy and community of well-run leisure and entertainment premises. To this end, we aim to strike a balance between competing interests and have set out our policies in this Statement that we will apply in Camden with an aim of achieving that balance.'

Source:

Camden Statement of Licensing Policy 2022-2027 Page 18

Conclusion

There is unfortunately an increase in violence during the late hours in licensed premises. The violent offences can be difficult for police to investigate and require multiple units for a single incident.

Case Law has provided guidance and acknowledges there should be a regard for both prevention and deterrence when considering applications.

Police licensing have considered the potential burden that an condition would impose on the premises licence holder (such as the financial burden due to restrictions on licensable activities) as well as the potential benefit in terms of the promotion of the licensing objectives and believe there can be a fair compromise balancing the increase in hours.

Chapter 10 of the Section 182 Licensing Act Guidance instructs:

'Where there are objections to an application to extend the hours during which licensable activities are to be carried on and the licensing authority determines that this would undermine the licensing objectives, it may reject the application or grant it with appropriate conditions and/or different hours from those requested.'

Source:

Chapter 10, Section 182 Licensing Act Guidance

The earlier finish time for alcohol sales overall will deter some of the unwelcome clientele and reduce risk around heightened intoxication amongst customers thus better enabling the Management to uphold the Licensing Objectives. The MPS is committed to reducing alcohol-related crime and anti-social behaviour in the night time economy. It is believed that the earlier finish times will reduce serious offences, thereby improving the quality of life for customers, visitors to Caerdydd and local residents. This will in turn ease pressure on services within Caerdydd.

In summary, the view of the MPS is that this Application should be rejected in its current form, unless the termination times for licensable activities are restricted to 3am each day and the new amended conditions are appended to any licence granted.

If you have any additional questions please do not hesitate to contact me

Yours sincerely

PC Joel Francis

Licensing Constable [REDACTED]

Central North CC

Welsh Town Police Station

[REDACTED]

[REDACTED]

[REDACTED]