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Camden Town Post Office, 124 Camden High Street, London, NW1 0LU

Scale = 1:1447.740
6-December-2023

I want to apply for a

Premises licence

Are you an agent?

Yes - I am an agent

Agent Details

First name

[REDACTED]

Last name

[REDACTED]

Name of business

SG Licensing Ltd

Name and address

[REDACTED]

[REDACTED]

[REDACTED]

Email address

[REDACTED]

Telephone number

[REDACTED]

Does the premises have a name?

Yes

What is the name of the premises?

Camden Town Post Office

What is the address or location?

124 Camden High Street

NW1 0LU

London

What is the type of premises?

Shop and Post Office, with instore cafe

Describe the area it is situated in

commercial

Describe the layout of the premises

the store, post office and cafe are all on one floor. The premises will have dual functionalities: Post Office Operations: We plan to operate the post office from 9:00 AM to 5:30 PM, providing essential postal services to the community during regular

business hours. Retail Operations: In addition, we aim to operate the retail component of the business, which will offer a diverse range of products and services. This section will open from 8:30 AM and continue until 2:00 AM. The cafe will close at 23:00. The retail section will feature a variety of offerings, including: Hot Food: We will serve a range of hot food options to cater to different tastes and preferences. Cold Food: Our selection of cold foods will provide convenient, ready-to-eat choices. Indian Street Food: We plan to offer a variety of Indian street food items to add a unique flavor to our offerings. Soft Drinks: A range of soft drinks will be available to complement our food offerings. Alcohol is to be sold for consumption off the premises only. The cafe will not offer the sale of alcohol for on sale consumption.

Copy of the premises plans

- plan2.pdf

Tell us about the premises business hours

Day	Start time	End time
Monday	08:30	02:00
Tuesday	08:30	02:00
Wednesday	08:30	02:00
Thursday	08:30	02:00
Friday	08:30	02:00
Saturday	08:30	02:00
Sunday	08:30	02:00

Are there any seasonal variations for the

No

premises opening times?

Is the premises open to the public at times other than those listed? No

Is the premises an open space? No

Is the premises currently under construction? No

What is the non-domestic rateable value (NDRV) of the premises? 39168

How many people are expected to attend the premises at any one time? Less than 5000 people

Will the premises be exclusively or primarily used to sell alcohol? No

How are you applying for a premises licence? As an individual or group of individuals

Individual details

First name Dewan

Last name Ashrafi

Name and address

[REDACTED]
[REDACTED]
[REDACTED]

Email address

[REDACTED]

Telephone number

[REDACTED]

How long do you want your premises licence for? Permanently

When do you want your licence to start?

As soon as possible

Activity you wish to licence

i. Late night refreshments - Hot food or hot drinks only between 11pm and 5am. Refreshments outside of these times do not need to be licenced

j. Supply of alcohol

Late refreshments

Day	Start time	End time
Monday	23:00	02:00
Tuesday	23:00	02:00
Wednesday	23:00	02:00
Thursday	23:00	02:00
Friday	23:00	02:00
Saturday	23:00	02:00
Sunday	23:00	02:00

Where will refreshments be provided?

Outdoors

Tell us about the specifics of the activity

Late night refreshments will be provided for off sale consumption only. The cafe will not offer Late Night Refreshment

Are there any seasonal variations for the activity?

No

Will the activity take place at times other than those listed?

No

Alcohol supply

Day	Start time	End time
Monday	08:30	02:00
Tuesday	08:30	02:00
Wednesday	08:30	02:00
Thursday	08:30	02:00
Friday	08:30	02:00
Saturday	08:30	02:00
Sunday	08:30	02:00

Where will the supplied alcohol be consumed?

Off the premises

Are there any seasonal variations for the activity?

No

Will the activity take place at times other than those listed?

No

DPS details

Does your designated premises supervisor (DPS) currently hold a personal licence?

Yes

Was their personal licence issued by Camden?

No

Personal licence number

██████████

Issuing local authority

██

First name

Dewan

Last name

Ashrafi

Address

[REDACTED]
[REDACTED]
[REDACTED]

Signed Copy of the Designated Premises Supervisor (DPS) consent form

- dewanashrafidpsconsentandpassport.pdf

Will there be any activities associated with the premises which may give rise to concern in respect of children?

No

The prevention of crime and disorder

1) The premises licence holder shall ensure that CCTV cameras and recorders are installed at the premises and are of a standard acceptable to and approved by the Police. 2) The CCTV system shall be maintained in good working order and at all times the premises is open to the public, be fully operational covering both internal and external areas of the premises to which the public have access. 3) The CCTV camera views shall not be obstructed. 4) At least one CCTV camera shall be placed no more than seven feet above floor level near to each point of entry and exit in order to capture clear facial images of all persons entering and leaving the premises. 5) The medium on which CCTV images are recorded shall be of evidential quality; stored securely; shall be retained for a period of 31 days; and be available for inspection by the police or authorised officers on request. 6) When the premises are open for the purposes of licensable activities, a suitably trained member of staff shall be present to assist the police or authorised officers in obtaining the CCTV

footage. 7) Copies of any CCTV image shall be made available within 48 hours of the request to the police or local authority. 8) The facility to transfer the images to a compatible, removable format shall be held on the premises. 9) Staff working at the premises shall be trained in the use of CCTV and a log must be kept to verify this. 10) Signs must be displayed in the customer areas to advise that CCTV is in operation. 11) If the CCTV is inoperative or not installed and working to the satisfaction of the police, the licence holder shall notify the Police within 48 hours and give an estimate of the repair timescale. The licence holder and staff shall comply with all reasonable requests from the police. 12) Strong beer and cider above 5.5% ABV shall not be sold, save for a pre agreed premium range. 13) A minimum of two members of staff to be present at all times whilst the premises remain open for the sale of alcohol. 14) Notices shall be displayed in prominent positions on the premises near to where alcohol is kept and sold advising customers that the whole of the London Borough of Camden is a controlled drinking zone. 15) The licence holder shall ensure that alcohol is not sold in an open container, opened on the premises, or consumed on the premises.

1) Means of escape shall be maintained unobstructed, immediately available and clearly identifiable. 2) an accident book will be in operation, and ongoing will be kept for a period of three years

1) Deliveries to the premises shall not take place between 22:00 and 07:00 2) Collections of waste from the premises shall

Public safety**The prevention of public nuisance**

not take place between 23:00 and 08:00 3) Notices shall be prominently displayed at each exit from the premises asking customers to be considerate to neighbours when leaving. 4) External lighting for the premises shall be turned off after the premises are closed to the public. 5) Patrols of the area outside the premises shall be undertaken every hour during the use of the licence and any litter attributable to the premises cleared. 6) A minimum of 2 litterbins shall be provided by the licence holder at the front of the store for the use of customers. 7) Policies and procedures shall be put in place for collection of street litter generated by the premises and such policies shall be implemented by staff whenever the premises are being used under the terms of this licence.

The prevention of children from harm

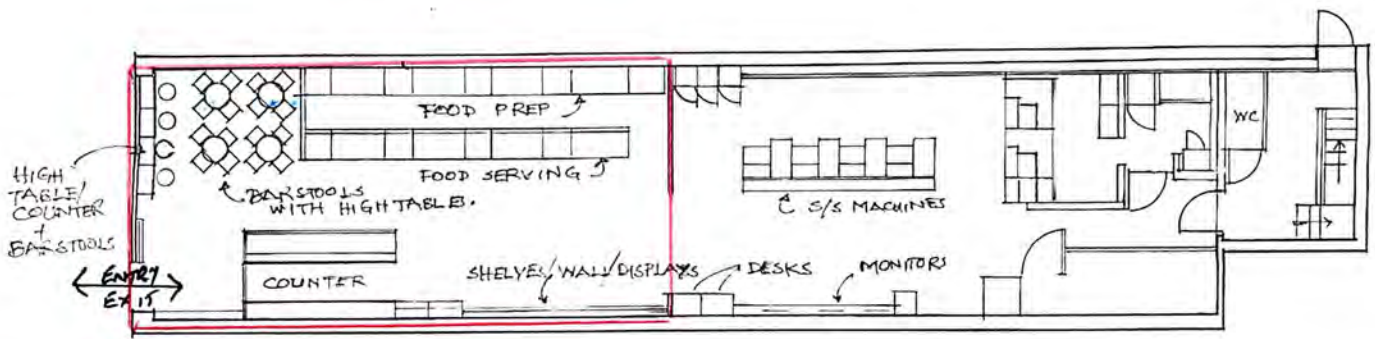
1) Posters shall be displayed in prominent positions around the till advising customers of the proof of age policy in force at the premises. 2) A refusals book shall be kept at the premises to record details of all refusals to sell alcohol. This book shall contain the date and time of the incident, a description of the customer, the name of the staff member who refused the sale, and the reason the sale was refused. The book shall be made available to police and authorised Council officers on request. 3) The designated premises supervisor shall regularly check the refusals book to ensure it is being consistently used by all staff. 4) The premises shall operate a Challenge 25 policy. 5) The premises shall use cash till prompts to remind staff to ask for proof of age.

About this form

Issued by	Camden Town Hall Judd Street London WC1H 9JE
Contact phone	020 7974 4444
Form reference	Ref. no. 117345

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CAMDEN TOWN
POST OFFICE

- LICENSEABLE AREA
- ▲ FIRE EXTINGUISHERS

From: Stewart Gibson <[REDACTED]>
Sent: 07 December 2023 11:27
To: Sarah Williams <[REDACTED]>
Subject: Re: Reps received - Ref no. 117345

[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.

Good morning Sarah.

In relation to the above application, which I understand is due to go to hearing on the 19th December at 19:00 hours, the applicant would like to add the following voluntary conditions in response to the objections raised.

Please could you forward these voluntary conditions to the objectors for their information.

1. As the request is for the premises to remain open until 02:00 for the sale of alcohol for consumption off the premises, and Late Night Refreshment, the applicant will engage the services of an SIA guard between the hours of 23:00 and 02:00 daily when the premises are open. The guard will remain in situ until the premises are closed to the public.
2. All display of alcohol will be behind counters in locked door fridges.

Please can you confirm when these additional conditions have been circulated.

Kind regards

Stewart Gibson
Licence Agent

**METROPOLITAN
POLICE****TOTAL POLICING**

Camden Licensing Authority

Town Hall Extension
Argyle St
London

WC1H 8EQ

PC Joel Francis [REDACTED]
CN - Camden BoroughLicensing Unit
Room 1.22
Kentish Town Police Station
12a Holmes Rd
London
NW5 3AEYour ref: **NEW117345****Monday 13th November 2023**

Dear Sir/Madam,

RE: Application NEW117345
Camden Town Post Office, 124 Camden High Street, NW1 0LU**With reference to the above Application, the Metropolitan Police Service (MPS) wishes to make a Representation.**

I certify that I have considered this application on its own merit, and the Representation is based on the likely indirect impact the grant may have on the locality. I provide a basis for my concerns within this document in the hope the Applicant and I can facilitate a compromise, as it is not the intention of the MPS to restrict any commercial ambition. As contained within the notes of 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.

Policing Camden

Police in Camden value our diverse and vibrant night time economy and seek to provide a safer environment for our residents, workers and visitors. The London Borough of Camden attracts a high number of visitors and has a high concentration of valued licensed venues. Naturally, during busier times, emergency service resources can become heavily drained, undermining our effective response to incidents that can often have huge personal impact on victims.

Key Policing Challenges:**Gender violence:**

Women have told us they feel unsafe being alone in Camden's streets during later hours and that they suffer from verbal harassment, unwanted staring and some are even followed. These incidents are especially more prevalent where there are higher concentrations of late night venues. The Camden Safety Hub has been set up to contribute in making Camden Town safer

Drink spiking:

Defined as applying a noxious substance to a drink with intent to cause harm. Such incidents in Camden have averaged one per week and are more likely to happen inside late night venues. Women are more likely to be targeted and these incidents are difficult

for Police to prove and therefore tackle. Police provide Welfare and Vulnerability Engagement (WAVE) training to licensed venues and provide advice on spotting the signs of vulnerability and suggestions on how to make venues more hostile to perpetrators.

Street violence:

The main issues the emergency services encounter are on the street once the alcohol purchased has been consumed. Late night refreshment venues, off licences, public spaces can become flash points of violence when groups from different venues congregate together. Indeed, alcohol related violence with injury inside pubs, bars and clubs is now overshadowed by what occurs in the street. Street robbery where intoxicated customers leaving night clubs and other late night venues are a regular occurrence and one Police Robbery teams are currently trying to tackle. Camden has two Police Tasking teams who patrol hot spot areas for violence. Regrettably, during the weekends the tasking teams are quickly diminished due to high demand and the high concentration of late night venues

Drug dealing:

Drug dealing is pervasive in town centres such as Camden Town, Kings Cross and St Giles. The anti-social behaviour and crime linked to the drug trade impacts innocent people and creates a permissible environment for other anti-social behaviour. The suspects who offer to supply people drugs often target customers of late night venues and the streets nearby, especially as venues have improved search regimes making it harder to deal drugs inside venues.

Public nuisance:

Camden Council Licensing Officers and the Environmental Noise Teams usually handle complaints arising from public nuisance. However, quite often the Police also have to respond to such complaints and we regularly provide assistance to Council teams

Addiction:

More poignantly, another concern is the impact alcohol has on the community; especially the homeless and those who are wholly dependent on alcohol. Camden Borough and its responsible authorities are doing their utmost to alleviate the issue of street drinkers, alcoholism and homelessness – therefore any new grants should be considered with sympathy for this ongoing community challenge

Unique Application Issues:

The view of the MPS is that this Application should be rejected in its entirety, as the proposals are likely to increase harm in an already saturated and stressed area.

This premises is based within the Camden Town policing ward within the Camden Town Cumulative Impact Area. Metcall (999 Despatch) will primarily be tasking Police Officers parading out of Kentish Town Police Station to this location. Kentish Town Police Station is 1 mile away or a 9 minute car journey on Google Maps.

The consumption of alcohol off licensed premises presents risks around hidden addiction, unsupervised drinking and self-harm by vulnerable individuals. Mental illness and addiction to alcohol is a major contributor to domestic violence. Such domestic incidents have devastating impacts on young people and health implications for vulnerable groups suffering from mental illness and addiction.

The Institute of Alcohol Studies (2019) cites the impact of Domestic Abuse, Sexual Assault and Child Abuse with the following finding; 'Research typically finds that between 25% and 50% of those who perpetrate domestic abuse have been drinking at the time of the assault, although in some studies the figure is as high as 73%'. Domestic incidents take much longer to deal with than a fight in the street. Intoxicated victims and witnesses are less likely to assist in the early stages of a criminal investigation, which can have a frustrating impact on the outcome. There will unfortunately be households living close by who live with problematic alcohol consumption.

Though there are generally less crime and disorder incidents at venues conducting off sales, as outlined above they can be impact on policing. It will be residents and other workers within the neighbourhood who will have the burden of managing the extra customer egress and dispersal caused by the additional provision of late night off sales. The extra hours being sought effectively prolong the negative impact of the night time economy.

Late Night Refreshment venues attract people from different pubs and clubs and sometimes during their brief encounters in the fast food venues it ignites something between them and causes an altercation or fight when outside or further down the road. The MPS have noted over the years that the majority of alcohol related crime, especially in the early hours of the morning does not occur inside venues but on the streets, therefore these type of venues keep people on the streets for longer causing incidents in the general vicinity.

Contrary to popular belief, food does not assist with soaking up the alcohol consumed and/or lower intoxication levels until much later, perhaps even a few hours later. At the time the person is intoxicated it simply keeps them on the street for longer where there is more chance they will be taken advantage of and/or subjected to crime. Common issues just outside late night refreshment venues include vomiting, noisy disturbance, urinating, littering, people needing medical attention due to intoxication and general drunken behaviour.

Research

There have been a total of 105 crimes recorded as taking place at **licensed premises only** in the 'NW1 0**' post code area so far in 2023. 35 crimes took place between midnight and 2am. Crimes at off licences and late night refreshment venues consisted of thefts, harassment and assaults between customers and against staff.

Any Licensing Hearing held as a result of this Representation may be supplied with further, specific, crime figures and intelligence reports relating to the venue or the area in which it is located.

Times Proposed By Applicant:

Post Office Times	Café Times	Off Licence LNR & Alcohol Times
9am-5:30pm	8:30am-11pm	8:30am-2am

The Applicant proposes the sale of Alcohol and Late Night Refreshments off licence only, but the times proposed above go beyond the Recommended Framework Hours.

Licensable activities are more likely to cause a disturbance to residents during the night and early morning, and this raises the possibility of anti-social behaviour, street crime and noise. After Framework Hours customers become more difficult to manage and the streets look and feel different with more volatility.

Recommended Conditions

Notwithstanding our position to recommend rejection of the Application, we have provided a number of further Conditions that the Applicant could consider, based on common complaints and incidents at venues running similar licensed operations:

1. Police must be called to incidents of violence and/or disorder where appropriate
2. An incident log shall be kept at the premises and be made available upon request to the Police or the Local Authority. The book will record the date, time and whom is making the entry. The following must be recorded:
 - a. All crime reported to the venue
 - b. All refused sales
 - c. Any complaints received
 - d. Any faults in the CCTV system
 - e. Any visit by a relevant authority or emergency service
 - f. CAD reference numbers where Police are called
3. All alcohol in the public parts of the premises shall be kept in display units. All display units for alcohol will have metal shutters.
4. Shutters will be locked at the end of permitted hours for the sale of alcohol and shall not be opened again until the start of permitted hours the following day.
5. There must be no single cans of beer, lager, cider, ale or spirit mixtures sold at the premises.
6. A personal licence holder to be present at the venue at all times when the venue is open during licensed hours.
7. No alcohol to be stored beneath the serving counters at any time.
8. All products to be paid for in full at the point of sale. No 'credit' to be offered to any customers.
9. The licensable activities authorised by this licence and provided at the premises shall be ancillary to the main function of the premises as a convenience shop.

Mediation & Discussion

In light of this Representation, we commit to an open channel of communication to explore areas of agreement where possible.

Conclusion

When looking at Applications set within stressed parts of Camden, there is an expectation that Responsible Authorities focus on prevention. Enforcement action can be protracted and a frustrating process for residents and interested parties. It is the residents and neighbours who suffer the most.

In commenting on the way committees and courts should approach the promotion of the licensing objectives (*East Lindsey District Council v Abu Hanif t/a Zara's Restaurant* 2016), Mr Justice Jay 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/beer-licensing-using-case-law

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

The balance is referred to in the Camden Council Statement of 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

In summary, the view of the MPS is that this Application should be rejected in its entirety, as the proposals are likely to increase harm in an already saturated and stressed area.

If you have any additional questions please contact me

Yours sincerely,

PC Joel Francis
Licensing Constable [REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]



Date: 13/11/2023
Application Reference: APP\PREM-NEW/117345
Direct Phone Number:
Contact: Esther Jones
E-mail: [REDACTED]



Public Protection
Supporting Communities
London Borough of Camden
5 Pancras Square
LONDON
N1C 1AG

Tel: 020 7974 4444 (switchboard)

London Borough of Camden
Fax: 020 7974 6955 / 6940
Textphone: 020 7974 6866

DX: 2106 Euston

www.camden.gov.uk

Please quote our reference in any correspondence

Licensing (Contact Camden)
Crowndale Centre
218 Eversholt Street
London
NW1 1BD

Licensing Act 2003 – SECTION 17
Re: Camden Town Post Office, 124 Camden High Street, London NW1 0LU

LICENSING AUTHORITY REPRESENTATION

This representation is made by the Licensing Authority, and it relates to the following licensing objectives: -

- The prevention crime and disorder
- Prevention of public nuisance

The Premises and Summary of Application

The application is by Me Dewan Ashrafi for the supply of alcohol and the provision of Late Night Refreshment. The premises is the post office on Camden High Street and the premises still intend to run as a post office as well as a café and store.



The premises is already operating as a commercial venture, and it's located on the ground floor of the premises on the high street. The area is well served by public transport which includes buses, and underground trains.

The operational hours the application is asking for are as follows: -

Alcohol

Monday to Sunday 08:30 – 02:00

Late night refreshment

Monday to Sunday 23:00 – 02:00

The opening hours of the premises

Monday to Sunday 08:30 – 02:00

Volunteered conditions in the operating schedule

The prevention of crime and disorder

- 1) The premises licence holder shall ensure that CCTV cameras and recorders are installed at the premises and are of a standard acceptable to and approved by the Police.
- 2) The CCTV system shall be maintained in good working order and at all times the premises is open to the public, be fully operational covering both internal and external areas of the premises to which the public have access.
- 3) The CCTV camera views shall not be obstructed.
- 4) At least one CCTV camera shall be placed no more than seven feet above floor level near to each point of entry and exit in order to capture clear facial images of all persons entering and leaving the premises.
- 5) The medium on which CCTV images are recorded shall be of evidential quality; stored securely; shall be retained for a period of 31 days; and be available for inspection by the police or authorised officers on request.
- 6) When the premises are open for the purposes of licensable activities, a suitably trained member of staff shall be present to assist the police or authorised officers in obtaining the CCTV footage.
- 7) Copies of any CCTV image shall be made available within 48 hours of the request to the police or local authority.
- 8) The facility to transfer the images to a compatible, removable format shall be held on the premises.
- 9) Staff working at the premises shall be trained in the use of CCTV and a log must be kept to verify this.
- 10) Signs must be displayed in the customer areas to advise that CCTV is in operation.

11) If the CCTV is inoperative or not installed and working to the satisfaction of the police, the licence holder shall notify the Police within 48 hours and give an estimate of the repair timescale. The licence holder and staff shall comply with all reasonable requests from the police.

12) Strong beer and cider above 5.5% ABV shall not be sold, save for a pre agreed premium range.

13) A minimum of two members of staff to be present at all times whilst the premises remain open for the sale of alcohol.

14) Notices shall be displayed in prominent positions on the premises near to where alcohol is kept and sold advising customers that the whole of the London Borough of Camden is a controlled drinking zone.

15) The licence holder shall ensure that alcohol is not sold in an open container, opened on the premises, or consumed on the premises.

Public Safety

1) Means of escape shall be maintained unobstructed, immediately available and clearly identifiable.

2) an accident book will be in operation, and ongoing will be kept for a period of three years.

Prevention of public nuisance

1) Deliveries to the premises shall not take place between 22:00 and 07:00

2) Collections of waste from the premises shall not take place between 23:00 and 08:00

3) Notices shall be prominently displayed at each exit from the premises asking customers to be considerate to neighbours when leaving.

4) External lighting for the premises shall be turned off after the premises are closed to the public.

5) Patrols of the area outside the premises shall be undertaken every hour during the use of the licence and any litter attributable to the premises cleared.

6) A minimum of 2 litterbins shall be provided by the licence holder at the front of the store for the use of customers.

7) Policies and procedures shall be put in place for collection of street litter generated by the premises and such policies shall be implemented by staff whenever the premises are being used under the terms of this licence.

Prevention of children from harm

- 1) Posters shall be displayed in prominent positions around the till advising customers of the proof of age policy in force at the premises.
- 2) A refusals book shall be kept at the premises to record details of all refusals to sell alcohol. This book shall contain the date and time of the incident, a description of the customer, the name of the staff member who refused the sale, and the reason the sale was refused. The book shall be made available to police and authorised Council officers on request.
- 3) The designated premises supervisor shall regularly check the refusals book to ensure it is being consistently used by all staff.
- 4) The premises shall operate a Challenge 25 policy.
- 5) The premises shall use cash till prompts to remind staff to ask for proof of age.

Framework Hours – Pages 36 of The Licensing Policy

The hours being applied for are outside of the framework hours for all the days of the week.

The framework hours are: -

On- Licence:

- Monday to Thursday 1000 hours until 2330 hours
- Friday and Saturday 1000 hours until midnight
- Sunday 1100 hours until 2230 hours

Off- Licence:

- Monday to Saturday 0800 hours until 2300 hours
- Sunday 1000 hours until 2230 hours

Cumulative Impact Areas

The premises is situated in the Camden Town Cumulative Impact Area, where there is a presumption to refuse all new and variation applications in its entirety, as set out in Chapter 6 of the Licensing Policy (Cumulative Impact Policies). While this presumption is rebuttable, this is only in exceptional circumstances where the applicant has successfully demonstrated that the granting of their application would not contribute or exacerbate the existing impact of licensed premises in that area.

Complaint History

I have checked the Council's records for the past 2 years and can confirm that no noise complaint has been received against the premises.

Conclusion

Although the applicant has provided some conditions in the operating schedule, I still believe the application should be rejected as it is in a cumulative area and there is no

need to have another premises operating within the area selling alcohol till 2am in the morning. Reason being, as it is a post office, the application has not proven conclusively, how the premises will not exacerbate the situation in the town centre, it has failed to show how increasing the number of premises selling alcohol even on a take away basis would not be an attraction to stragglers, nor how it will demarcate the post office business from the store business especially as there is the same operational hours for the two businesses.

There has been no Ask for Angela policy adopted, nor any mention in the application how they intend to protect the vulnerable who may perceive the post office as a place of safety. This is a great oversight on the part of the applicant.

I would therefore ask that the application be rejected outright, however, if members are minded to grant the licence that:-

The hours be reduced to framework hours for the sale of alcohol and the premises to adopt the Ask for Angela scheme.

Yours sincerely



Esther Jones
Licensing Team Leader



Ian Sandford
Public Health Strategist
Camden Health and Wellbeing
Department/Public Health



13th November 2023

**Representation from Camden Health and Wellbeing Department/Public Health
Department on behalf of health bodies providing health services in Camden**

Camden Town Post Office, 124 Camden High Street, London NW1 0LU

This representation is made on behalf of Camden Health and Wellbeing Department/Public Health as a responsible authority. It relates to the application for a new license to serve alcohol and provide late night refreshments at 124 Camden High Street, London NW1 0LU, with a request to sell alcohol between the hours of 08:30 and 02:00 Monday to Sunday, and late night refreshments between the hours of 23:00 and 02:00 Monday to Sunday.

The grounds for the representation are:

- public safety,
- the prevention of crime and disorder, and
- the prevention of public nuisance

We are concerned that if this application is granted, it will increase the availability of alcohol for consumption and the number of people drinking. The application will increase availability of alcohol within the Camden Town Cumulative Impact Area. This could lead to an increase in public nuisance, crime and disorder, hospital admissions and callouts and impact adversely on the health of those buying and consuming the alcohol as well as the health of others who encounter them.

We are also concerned that late night refreshments are often linked to alcohol-fuelled crime and disorder in the night-time economy because late-night drinkers congregate in such places.

Alcohol harms

The harms caused by alcohol in the UK are substantial. Recent figures show that alcohol costs the NHS £3.5bn a year, and alcohol related crime costs the country £11.4bn annually. In 2020, 7423 deaths were directly attributable to alcohol in England and Wales¹.

Alcohol use increased during the pandemic. An analysis by the Royal College of Psychiatrists indicates that people who were already heavy drinkers began drinking more, while people in recovery reported a much higher rate of relapse².

Ambulance callouts

The data on alcohol-related ambulance callouts reflect where the ambulance attended, not where the individual resides. Alcohol-related ambulance callouts highlight the immediate harms of alcohol on health and thus the risk to physical safety that alcohol causes.

¹ <https://www.bmj.com/content/375/bmj.n2678>

² www.rcpsych.ac.uk/news-and-features/latest-news/detail/2020/09/14/addiction-services-not-equipped-to-treat-the-8-million-people-drinking-at-high-risk-during-pandemic-warns-royal-college.

Between January 1st 2019 and December 31st 2022, there 181 alcohol related ambulance callouts within 250m (an average of 45 per year).

Data for alcohol-related ambulance callouts in 2023 are available at the larger Lower Super Output Area. Two LSOAs are relevant to Camden Town Post Office because Camden Town High Street marks the dividing line between two LSOAs at that point. In the LSOA in which Camden Town Post Office is located, between October 1st 2022 and September 30th 2023 there were 23 alcohol related ambulance callouts, a rate of 15.4 per 1,000 residents aged 18 and over, significantly above the Camden rate of 5.4 per 1,000 residents aged 18 and over. In the LSOA situated on the opposite side of Camden High Street there were 90 alcohol related ambulance callouts over the same period, a rate of 51.0 per 1,000 residents aged 18 and over.

The high rates of alcohol related ambulance callouts demonstrates the considerable level of public harm in the area arising from alcohol use.

Within 100 metres of the premises there are 13 premises licensed to sell alcohol on the premises and 5 premises licenced to sell alcohol off the premises. Within 250 metres of the premises there are 57 premises licensed to sell alcohol on the premises and 15 premises licenced to sell alcohol off the premises. Eight of the 15 premises licenced to sell alcohol off the premises are able to do so 24 hours a day.

The large numbers of premises licenced to sell alcohol in the area is a key factor in the current levels of public harm due to alcohol.

There are 1 premises licensed to sell late night refreshments within 100m of the premises, and 3 within 250m of the premises. These premises are defined here as licenced to serve late night refreshments but do not serve alcohol, which differentiates such premises from restaurants that remain open late. They are typically takeaway venues.

Alcohol Data

The impact of alcohol is particularly great in Camden³.

Camden has the ninth highest number of alcohol specific deaths across London (2021/22).

Camden is the London borough with the fourth highest number of deaths due to chronic liver disease (2021-2022).

Camden is the fifth highest London borough for hospital admissions due to alcohol specific conditions (2021/22).

Camden is the eight highest London borough for hospital admissions for cardiovascular disease caused by alcohol (2021/22).

Summary

There is evidence that increased availability of alcohol results in an increase in alcohol-related harm and increases the impact on a number of frontline services and the community as a whole. Camden Town Post Office is located in an area that has high availability of alcohol and high levels of harm due to alcohol.

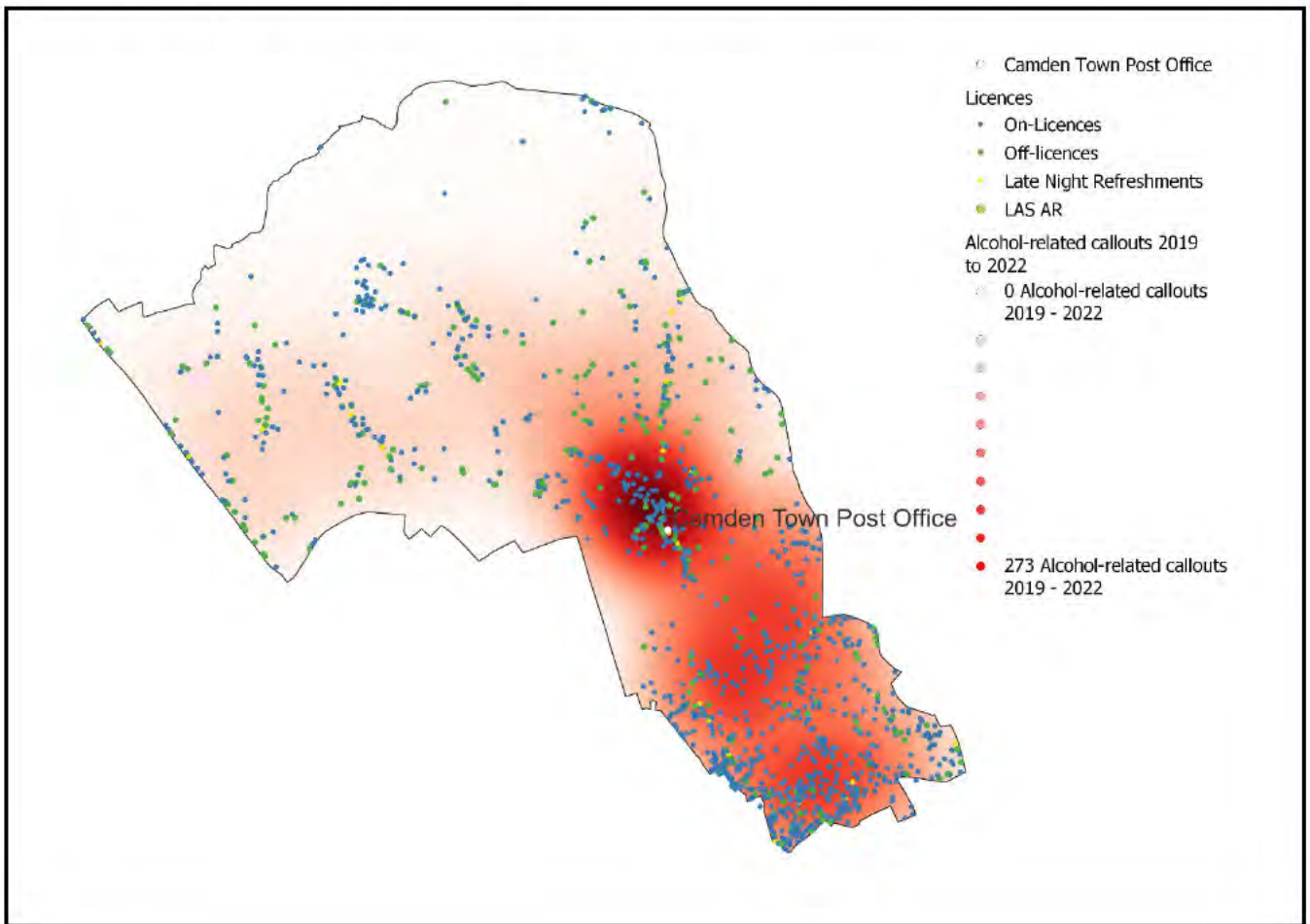
³ [Local Alcohol Profiles for England \(LAPE\) - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/collections/local-alcohol-profiles-for-england-lape)

Recommendation

Camden Town Post Office is in a Cumulative Impact area, where the number, type and density of premises selling alcohol for consumption on the premises has a serious negative impact on the local community and local amenities. An additional premises is likely to add to the impact on the area.

Camden Health and Wellbeing Department/Public Health Department recommends that the Committee refuse the application for a premises licence to sell alcohol and late night refreshments as this would likely increase levels of alcohol related harm in the area.

Appendix A. Map of Camden showing Camden Town Post Office, premises licensed to sell alcohol on- and off- the premises, and premises licensed to sell late night refreshment (which do not also sell alcohol), with a background shaded according to the number of alcohol related ambulance callouts between January 1st 2019 and December 31st 2022.



Contact Camden

Representation for application reference no. APP\PREMISES-NEW\117345

Representation	
Premises name	Camden Town Post Office
Application reference number	APP\PREMISES-NEW\117345
Last date for representation	13/11/2023

Making a representation as

As an organisation

Your details**Organisation name**

TRACT

First name

Kathryn

Last name

Gemmell

Telephone number (optional)**Email address**

[REDACTED]

Address

3 Ivor Street
London
NW1 9PL

Remain anonymous

No

Grounds of representation

- prevention of public nuisance

Details of representation

RE: APP\PREMISES-NEW\117345 for 124 Camden High Street NW1 0LU The situation for residents around Camden Town is already intolerable. This application for a new off-sales and late night refreshment premises is within the CIZ and is completely unacceptable. We object on the grounds of public nuisance. Your licensing policy states: 6.20 We expect applicants to demonstrate an understanding of how the policy affects their application and identify the measures they will take to mitigate any negative impact on any of the

licensing objectives. Applicants should also state why they consider the application should be an exception to the policy. 6.22 We will consider each case on its merits, though applicants should be aware that we would only depart from the policy in respect of cumulative impact in exceptional circumstances. 6.24 Where we receive relevant representations, we will in almost all cases, refuse applications for licences within the two cumulative impact policy areas. The applicant states that they want to run a café from 08:30-23:00hrs yet the application seeks late-night refreshment until 02:00hrs and off sales from 08:30hrs until 02:00hrs Mon-Sun. These late-night hours encourage people to stay around longer in the area causing more noise, vomit, street urination. Late-night revellers are targets for drug-dealers and gangs. There is already a significant problem in Camden with street drinking and the resulting anti-social behaviour that impacts residents and indeed visitors and tourists in the area. The police have recently confirmed that there is an increase in crime associated with off licenses. They have made no suggestions as to how they would uphold the councils licensing objectives to prevent public nuisance or why they should be an exception to Camdens licencing policy. We have no objections to the running of a café within framework hours. We object strongly to any alcohol sales and off sales and to late-night refreshment. We urge you to reject this application in full. Examples of the results of the late-night impact on Camden Town attached.

Supporting documents (optional)

- 230211TRACTphotosofCamdenTowncentrefo pdf
- 230212TRACTphotosofCamdenTowncentrefo pdf

About this form**Issued by**

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Judd Street
London
WC1H 9JE

Contact phone

020 7974 4444

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TRA TRACT ACT

Examples of typical street conditions on a Saturday afternoon.



Empty bottles, graffiti, urine, dirt, drinks spillage – nothing cleaned.

Buck Street is a urinal all day – even with public toilets available in the adjacent market

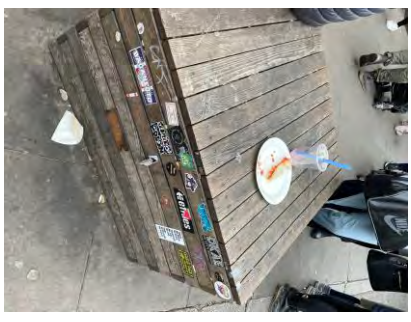
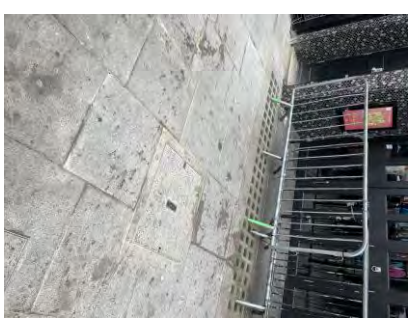
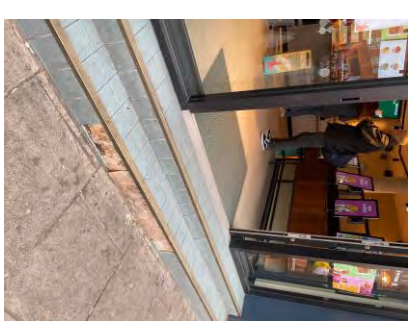
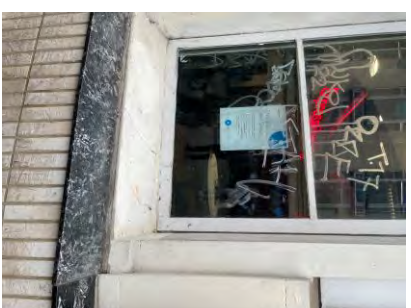
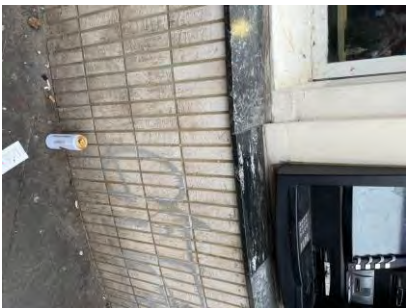
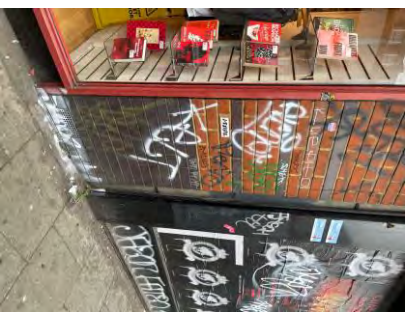


Plinth used to have planters but vandalised



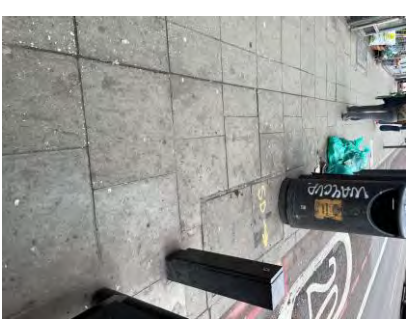
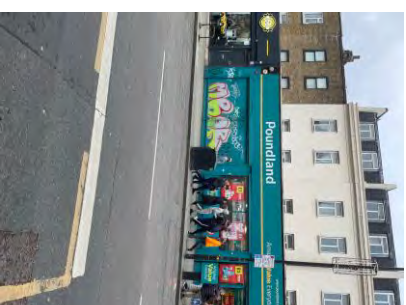
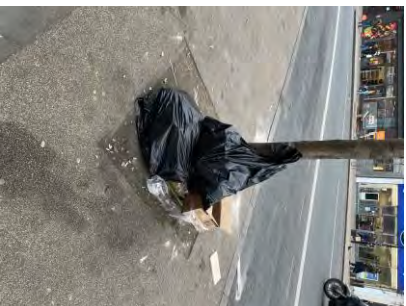
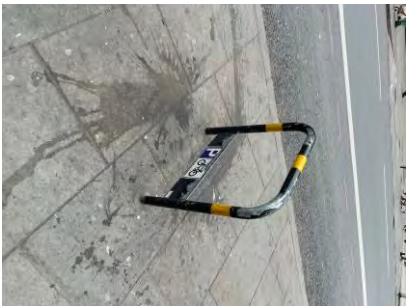
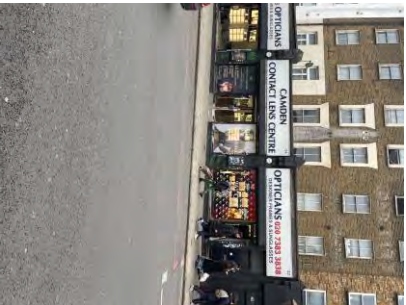
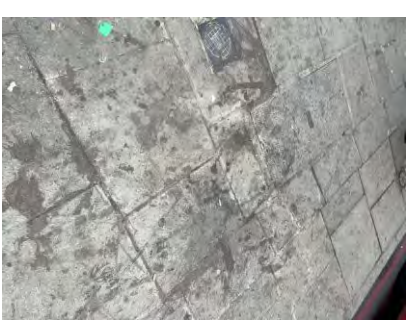
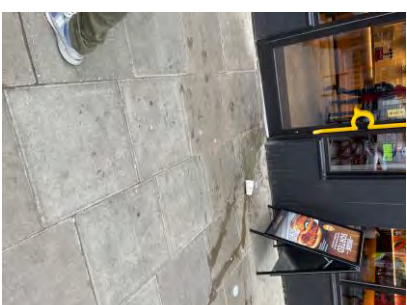
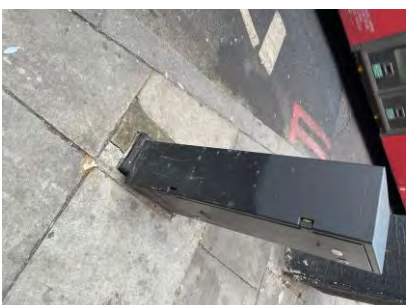
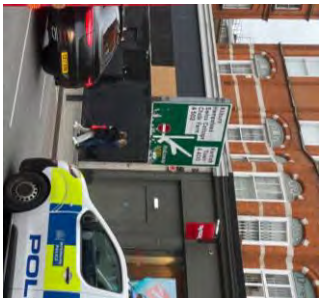
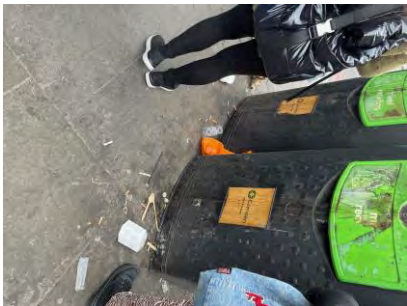
TRA TRACT ACT

Examples of typical street conditions on a Saturday afternoon.



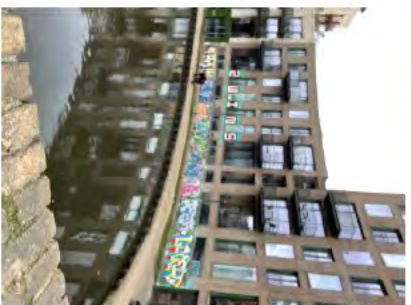
TRA TRACT ACT

Examples of typical street conditions on a Saturday afternoon.



TRA TRACT ACT

Examples of typical street conditions on a Sunday morning.

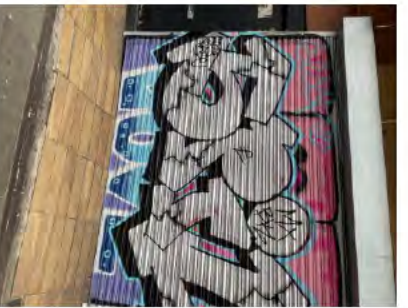
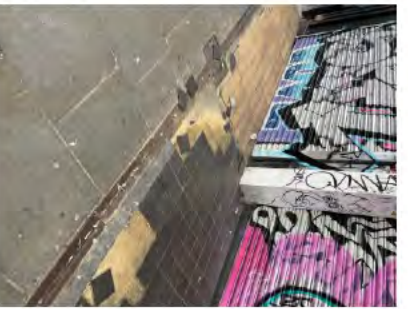
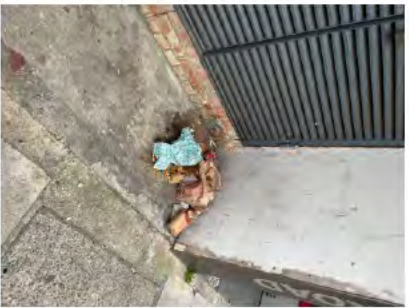
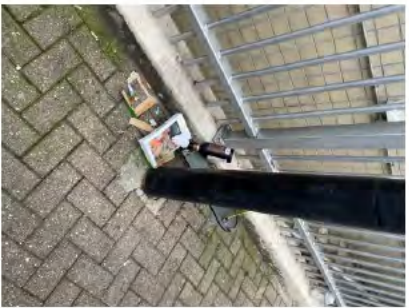


Further damage overnight

Drug dealers

TRA TRACT ACT

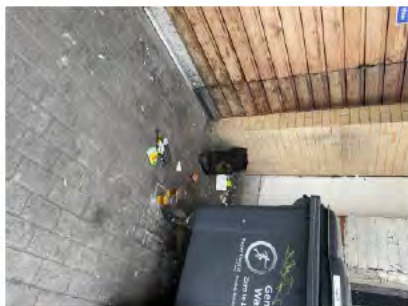
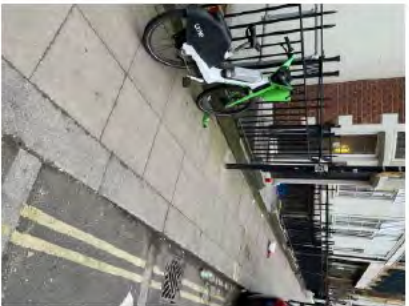
Examples of typical street conditions on a Sunday morning.



Rubbish overnight

TRA TRACT ACT

Examples of typical street conditions on a Sunday morning.



Nitrous oxide
containers

Contact Camden

Representation for application reference no. APP\PREMISES-NEW\117345

Representation	
Premises name	Camden Town Post Office
Application reference number	APP\PREMISES-NEW\117345
Last date for representation	13/11/2023

Making a representation as

As an organisation

Your details**Organisation name**

Delancey Street Residents Association

First name

Catherine

Last name

Colley

Telephone number (optional)

[REDACTED]

Email address

[REDACTED]

Address

32 Delancey Street
 London
 NW1 7NH

Remain anonymous

No

Grounds of representation

- prevention of crime and disorder
- ensuring public safety
- prevention of public nuisance

Details of representation

Anti-social behaviour, drug crime and general public disorder and nuisance has increased in recent years and is causing intolerable levels of disturbance at night for local residents and is also creating an unsafe place to live - with drunk and disorderly people in the street and drug related crimes taking place in our street. This application wants to extend opening

hours in order to sell alcohol - this is completely unnecessary and will further increase the number of people roaming the streets drinking in the streets and creating noise and disturbance. This leads to anti-social behaviour and drug crime.

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Contact phone

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Representation for application reference no. APP\PREMISES-NEW\117345

Representation	
Premises name	Camden Town Post Office
Application reference number	APP\PREMISES-NEW\117345
Last date for representation	13/11/2023

Making a representation as

As an individual

Your details**First name**

Caroline

Last name

Choo

Telephone number (optional)**Email address**

[REDACTED]

Address

Apartment 9 Chant House
 100 102 Arlington Road
 London
 NW1 7HP

Remain anonymous

No

Grounds of representation

- prevention of public nuisance

Details of representation

RE: APP\PREMISES-NEW\117345 for 124 Camden High Street NW1 0LU - The situation for residents around Camden Town is already intolerable. This application for a new off-sales and late night refreshment premises is within the CIZ and is completely unacceptable. We object on the grounds of public nuisance. Your licensing policy states: 6.20. We expect applicants to demonstrate an understanding of how the policy affects their application and identify the measures they will take to mitigate any negative impact on any of the

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Contact Camden

Representation for application reference no. APP\PREMISES-NEW\117345

Representation	
Premises name	Camden Town Post Office
Application reference number	APP\PREMISES-NEW\117345
Last date for representation	13/11/2023

Making a representation as

As an individual

Your details**First name**

Margaret Patricia

Last name

Thomas

Telephone number (optional)

[REDACTED]

Email address

[REDACTED]

Address

7 Hartland Road
 London
 NW1 8DB

Remain anonymous

No

Grounds of representation

- prevention of crime and disorder
- ensuring public safety
- prevention of public nuisance

Details of representation

This is an application which seeks to sell LNR and alcohol until 2am in a cumulative impact area and the assumption is that it will be refused. There is no serious attempt to address the Council's policy on cumulative impact. In addition the hours are far too late and the applicants are asking to sell alcohol for consumption off the premises. It is surprising that they are even attempting to secure a licence for these purposes, given the location of the

premises in the part of Camden where public nuisance, crime and disorder are most prevalent. The situation would be far worse if people were hanging around late at night eating and drinking, I hope this application will be rejected in its entirety.

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WC1H 9JE

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Conditions consistent with the operating schedule

1. The premises licence holder shall ensure that CCTV cameras and recorders are installed at the premises and are of a standard acceptable to and approved by the Police.
2. The CCTV system shall be maintained in good working order and at all times the premises is open to the public, be fully operational covering both internal and external areas of the premises to which the public have access.
3. The CCTV camera views shall not be obstructed.
4. At least one CCTV camera shall be placed no more than seven feet above floor level near to each point of entry and exit in order to capture clear facial images of all persons entering and leaving the premises.
5. The medium on which CCTV images are recorded shall be of evidential quality; stored securely; shall be retained for a period of 31 days; and be available for inspection by the police or authorised officers on request.
6. When the premises are open for the purposes of licensable activities, a suitably trained member of staff shall be present to assist the police or authorised officers in obtaining the CCTV footage.
7. Copies of any CCTV image shall be made available within 48 hours of the request to the police or local authority.
8. The facility to transfer the images to a compatible, removable format shall be held on the premises.
9. Staff working at the premises shall be trained in the use of CCTV and a log must be kept verifying this.
10. Signs must be displayed in the customer areas to advise that CCTV is in operation.
11. If the CCTV is inoperative or not installed and working to the satisfaction of the police, the licence holder shall notify the Police within 48 hours and give an estimate of the repair timescale. The licence holder and staff shall comply with all reasonable requests from the police.
12. Strong beer and cider above 5.5% ABV shall not be sold, save for a pre agreed premium range.
13. A minimum of two members of staff to be present at all times whilst the premises remain open for the sale of alcohol.
14. Notices shall be displayed in prominent positions on the premises near to where alcohol is kept and sold advising customers that the whole of the London Borough of Camden is a controlled drinking zone.
15. The licence holder shall ensure that alcohol is not sold in an open container, opened on the premises, or consumed on the premises.
16. Means of escape shall be maintained unobstructed, immediately available and clearly identifiable.

17. An accident book will be in operation, and ongoing will be kept for a period of three years.
18. Deliveries to the premises shall not take place between 22:00 and 07:00.
19. Collections of waste from the premises shall not take place between 23:00 and 08:00.
20. Notices shall be prominently displayed at each exit from the premises asking customers to be considerate to neighbours when leaving.
21. External lighting for the premises shall be turned off after the premises are closed to the public.
22. Patrols of the area outside the premises shall be undertaken every hour during the use of the licence and any litter attributable to the premises cleared.
23. A minimum of 2 litterbins shall be provided by the licence holder at the front of the store for the use of customers.
24. Policies and procedures shall be put in place for collection of street litter generated by the premises and such policies shall be implemented by staff whenever the premises are being used under the terms of this licence.
25. Posters shall be displayed in prominent positions around the till advising customers of the proof of age policy in force at the premises.
26. A refusals book shall be kept at the premises to record details of all refusals to sell alcohol. This book shall contain the date and time of the incident, a description of the customer, the name of the staff member who refused the sale, and the reason the sale was refused. The book shall be made available to police and authorised Council officers on request.
27. The designated premises supervisor shall regularly check the refusals book to ensure it is being consistently used by all staff.
28. The premises shall operate a Challenge 25 policy.
29. The premises shall use cash till prompts to remind staff to ask for proof of age.

Conditions consistent with the operating schedule

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28. The premises shall operate a Challenge 25 policy.
29. The premises shall use cash till prompts to remind staff to ask for proof of age.

Additional conditions offered on the 7.12.23

30. As the request is for the premises to remain open until 02:00 for the sale of alcohol for consumption off the premises, and Late-Night Refreshment, the applicant will engage the services of an SIA guard between the hours of 23:00 and 02:00 daily when the premises are open. The guard will remain in situ until the premises are closed to the public.
31. All display of alcohol will be behind counters in locked door fridges.