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Your ref:
Our ref:
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Unit 3 , Ilderton Wharf, Rollins street SE15 1EW

Lewisham Police Licensing acknowledge receipt of an application for a new premises licence for a multi room events space at the above location with an eventual capacity of 3000. The proposed operating hours range from 8am through to 7am on a weekend and 11am to midnight during the week. The events listed on the licence are Indoor sporting events, boxing/wrestling entertainment, live music, recorded music, performance of dance, anything of a similar description to the latter 3 activities, late night refreshment and supply of alcohol.

Police would like to outright object to this application under the following Licensing objectives:

Prevent crime and disorder
Public safety
Prevent public nuisance
Protect children from harm

After considering the application, conditions offered by the applicant and taking into account the location of the proposed premises and its environs Police licensing feel that the proposed premises will undermine not only the Licensing objectives but also greatly affect the residences and the quality of their lives. The applicant has failed to take into account and address the negative impact that this venue will have. The extensive hours proposed will impact greatly on the lives of those in the surrounding areas, giving very little respite for residents.

Geographical Location

Rollins Street is a highly residential area with the Winslade Estate directly opposite the proposed venue site. The Winslade estate is made up of 22 blocks of flats centred around a children's play area. The estate has permit holder parking only and double yellow lines on the rest of the estate. There are two new build high rise blocks of flats on Ilderton Road overlooking the venue and in particular where the proposed stage will be.

On Surrey Canal Road where the proposed entrances/exits will be there is grass bank that leads down onto the main road. Currently there is no access to this area from the proposed site and it is unknown if planning is required to have access there. Opposite the proposed entrance and exits on Surrey Canal Road is another club with a capacity of 500 with extended drinking hours until 7:30am at the weekend.

Just off Ilderton Road and in close proximity to the proposed new venue is Millwall football club which has a capacity of 20,000. A sterile area had to be created for the sole purpose of fans to access and egress the football ground to transport hubs to prevent disturbance to the local residents.

Close to the venue are several estates that house young people of varying friendship groups which on occasion have led to tensions within the local community.

There is limited bus availability in the area and the buses are small hopper buses. Would the patrons be queuing in the residential streets waiting for buses or walking to the railway station or waiting for taxis? There is very limited parking availability. The applicant states people can use Uber taxis but there is nowhere in the locality for them to park or wait. The amount of taxis needed would create a nuisance for the local residents and other road users.

The applicant states the patrons can use the rail and tube network. The nearest station is a fifteen minute walk away. This not only has a negative impact on the local residents with the noise and behaviour of a large capacity dispersing into the surrounding streets. With similar venues close by as well as being in such a densely populated area this will put a huge burden on all public transport hubs in the area.

The application (public nuisance/public safety)

The applicant appears to have covered a lot when first reading the application form, however, having met the applicant at the venue it became evident the venue is not fit for the purpose that the applicant intends.

The venue is a very large empty warehouse with a tin roof. There are no toilets at the site for the public to use and nothing to stop sound emanating from there. I understand planning permission has not been sought and a change of use from a warehouse to a late night economy venue is not in place. The applicant informed me he does not wish to throw money at this project if he cannot get a licence, so the intention is to get the licence before planning permission is granted as that is costly. However, there is no way to monitor if the planning permission is to be applied for and carried out after the licence is granted or if the planning permission would even be granted. The applicant showed an interest in operating using temporary event notices and said they would apply for multiple at the same time. However a TEN is for a maximum of 499 people and there is still no solution to the noise problem.

The Lewisham Borough statement of Licensing Policy 2020 – 2025

2.26 states: The licensing Authority urges all applicants to ensure they have the correct planning use for the business type they are operating before they apply for their licence. Both planning and licensing consents must be in place for a business to operate legally.

Also in the statement policy under Licensing Objectives and operating schedules:

3.5 Applicants are expected to demonstrate sufficient local knowledge and steps to mitigate any negative impact on the licensing objectives.

Knowledge of local area and proximity to local residences and how their activities will impact on these.

An understanding of crime levels and types in the area and any problem hotspots where their activities may impact street congregating. On meeting the applicant I was asked if there was high crime in the area. Street congregating will occur because of the lack of transport facilities in the area and the sheer capacity proposed at the venue as well as Millwall football club in very close proximity and the other club opposite sharing the same transport facilities.

Knowledge of any local youth establishments including schools and areas where children may congregate. There is park directly opposite the venue.

On the application form under the prevention of public nuisance the applicant states: All windows and doors must be kept shut whilst entertainment is in progress except for the immediate entrance egress of patrons.

They have no facility or planning permission to hold any entertainment inside the venue and plan to hold the entertainment outside playing recorded music and having a stage for live music. I understand this has also not been put to the planning department. To limit noise they plan to stack containers two high around the outside area of the venue and fill them with hay. Hay is combustible and therefore a fire hazard whether it is wet or dry. When this was put to the applicant he stated he would cover the hay with tarpaulin and they had used it at other venues. I believe a noise limiter cannot be used outside which is why the applicant has suggested hay.

The applicant has therefore not demonstrated how he will prevent the local residents being disturbed by constant noise/loud music from the venue or what impact this will have on their quality of life. The hours they plan to operate are excessive and will have a detrimental effect on the surrounding area.

The entry/egress route the applicant would like to use is currently fenced off. The applicant proposes to create gates and use scaffolding to form a bridge to take the patrons down onto Surrey Canal Road. Scaffolding is a temporary structure and its intended use is not for general public use, especially people who may be intoxicated and wearing unsuitable footwear. This route would also take the patrons directly onto a main road and opposite the other club in the area. Previous experience of venues such as this is that the patrons walk straight across the road with no consideration to vehicles and cause an obstruction as well as danger to themselves. The structure may be wet and slippery due to the weather and may also collapse in an emergency situation should the venue need to evacuate. Lighting has also not been mentioned.

The applicant has applied for Late night refreshment and proposes to have off and on sales of hot food this will encourage customers to remain on site or in the locality whilst consuming their purchases greatly increasing the chance of noise nuisance disturbing local residents but also the impact of littering from food packaging, not only on the streets but within the gardens of residential properties.

We understand the DPS may also be the DPS for more than one venue and we would like to ascertain if this is fact and if so how would they manage more than one venue especially one as large as this.

Children

The applicant states no children on the premises after 2100 hours but also proposes to hold wedding parties/ private parties at the venue. There is no explanation how this can be managed or how children can be kept separate from adult entertainment areas as children would be expected to be present at a wedding or birthday party. The applicant also stated they would provide 20 porta loos per 1000 people. How will they protect children from harm if they are using the same toilets as the rest of the patrons?

The area is densely populated and school children reside in the locality, they will regularly be in the presence of the patrons coming and going to the premises and also subjected to the noise from the premises, this may have a negative impact on their sleep and subsequently their schooling as well as having to share the public transport with people who may well be intoxicated.

Crime

The area is within the New Cross Ward. Research on the crime database shows this to be a high crime area. Although this is not directly linked to this venue the patrons of the venue may find themselves victims of crime. The applicant has applied for a licence to run from 11am finishing at 6am on a Friday and Saturday, We would suggest that in a period of nineteen hours the chances of crime and damage to health from the consumption of alcohol would be greatly increased. .The ability to monitor inebriation of alcohol and any other substances is made increasingly difficult by the large capacity that the venue is able to hold. Of greater concern is that they have applied for a seasonal variation which would allow them to stay open all day on bank holidays which potentially allow a customer to remain drinking at the venue for over two days.

It is our belief that the large capacity and the hours requested would lead to an increase of crime and anti-social behaviour which would become an extra burden on emergency services.

It is also a fact that drug use occurs in late night economy venues and we understand that a death occurred in a previous venue run by the applicant. While we accept drugs can be hidden, random searches of entrants would make it easier to hide drugs. A

search of every applicant as a requirement of entry would discourage hiding drugs or weapons.

Relevant Local strategies - Statement of licensing policy 2020 - 2025

2.21 – The council has developed a wide range of initiatives to tackle alcohol related harm through its alcohol delivery plan, the delivery of which is overseen by the Lewisham health and wellbeing board. Additionally, reducing alcohol harm is one of the key priorities in the ten year Lewisham health and wellbeing strategy (2013 – 2023).

2.24 Key aims of policies within this statement are to discourage drunkenness and excessive drinking and encourage licensees to promote licence objectives by including more availability of food and seating within their operating schedules. This is to encourage the enjoyment of alcohol alongside other entertainment, not as the main offer.

7.13 The times within which live music and /or amplified sound may be played in any external area or marquees or relayed by external speakers (where permitted under the terms of the licence). The licensing authority deems this should not continue beyond 10pm.

24.1 It is known that there is a strong link between vertical drinking and violent and disorderly behaviour. Increased levels of drinking amongst patrons are also associated with vertical drinking. Given the clear public health (2.20) and crime and disorder considerations around this, the licensing authority expect any application that proposes vertical drinking to make this clear in their operating schedules and outline effective measures for managing associated risks.

Police Licencing acknowledge that all options are open to committee but with the application in its current form cannot be supported by Police whilst the licensing objectives and the Lewisham Council Statement of Licensing Policy have been ignored. Police licensing would strongly recommend that this application be denied.

Yours sincerely,

Gillian Pearce – South East BCU Police Licensing Officer