

Lewisham Council
Holbeach Office, 9 Holbeach Road,
Catford, SE6 4TW, London

Re: Objection to Adana Premier Store Premises License Application
("Adana Premier Store, Unit D Adana Building, **Connington Road, SE137FD**")

Dear Lewisham Licensing Authority,

I am writing to formally object to the license application submitted for the Adana Premier Store, Unit D Adana Building, Conington Road SE137FD, London.

Firstly, I believe that due to the incorrect postcode information on the application, namely SE137FD, it took much longer to complete the research regarding the proposed business. Therefore, it would be fair to have a full 28 days following an updated application with the correct postcode, which I think is SE13 7LH (Annex A and B).

As a resident living in the same building where the proposed shop will be located, I am concerned about the potential impact of the granting of this license on the community and the fulfillment of the statutory licensing objectives outlined in the Licensing Act:

1. Alcohol Sales Focus:

Under the section 5 of 21 (General Description of Premises), the applicant describes the proposed premises as "*Alcohol is not the intended focus of the business there is an expectation that alcohol sales will have a limited impact on the area*" and in the same paragraph, they advise that "*The premises will be a new convenience store under the brand of Premier*".

The proposed 'Premier' brand is a franchise model. While the applicant asserts that alcohol is not the intended focus of the business, a cursory Google search reveals weekly alcohol offers from 'Premier' stores (Annex C), which are priced competitively, if not lower, than major supermarket chains such as Tesco. This raises significant concerns about the

veracity of the claim that alcohol will not be the primary focus of the business. The prevalence of such promotions suggests a strategic emphasis on alcohol sales, potentially leading to a situation where alcohol constitutes a substantial majority of the store's overall sales.

Given the associated risks, including public safety concerns and the potential for increased alcohol-related incidents, I urge the licensing authority to carefully scrutinize the applicant's assertions and consider the potential impact of granting this license on the local community.

2. Prevention of Crime and Disorder:

I believe that the approval of the alcohol license for Adana Premier Store may contribute to an increase in crime and disorder in our community.

According to the Metropolitan Police data, the location of the proposed establishment is already identified as a crime hotspot (Annex D-1 and D-2). Disturbingly, the data indicates that anti-social behavior is one of the predominant crimes reported in this area. Introducing a new shop selling alcohol in this already problematic location raises serious concerns about exacerbating the existing issues related to anti-social behavior. Granting a license under these circumstances could potentially contribute to an increase in crime and disturbance, negatively impacting the safety and well-being of the community.

3. Public Safety:

Granting the license could compromise public safety in the vicinity of the proposed shop. My primary concern revolves around the potential escalation of motorbike traffic in the pedestrian-only zone, particularly in the context of anticipated partnerships with online delivery services such as UberEats and Deliveroo.

Please see the attached screenshots where similar 'Premier Stores' offers such delivery services (Annex E).

The current situation, where motorbikes are traversing pedestrian-only zones for the delivery of takeaways to residents has already raised significant public safety issues (Please see the video – Annex F). This has led to an increase in noise, congestion, and poses risks to pedestrians navigating these areas. Introducing alcohol sales with associated online delivery services may exacerbate these problems, as it is likely to attract even more motorbike traffic.

I urge the licensing authority to consider the detrimental impact on public safety that such an influx of motorbikes could have. The potential risks include not only noise disturbances but also an increased likelihood of accidents and conflicts between pedestrians and motorbike riders. Rejecting this license application is crucial to

maintaining the safety and tranquility of our pedestrian-only zones.

4. Prevention of Public Nuisance (Litter, waste, street fouling and street drinking):

The operation of an alcohol-selling establishment at this location has the potential to create a public nuisance by increasing number of the street drinkers and associated anti-social behavior.

Lewisham Council's Statement of Licensing Policy 2020-25 (page 39) defines the potential impact of Off License business activities as: "High risk of attraction of street drinkers and associated anti-social behaviour"

Currently, Elverson Road DLR Station footbridge and surrounding area suffers from street drinkers when people buy alcohol from Hardings News (SE137LH) and consume next to the stairs leading to the footbridge during warmer months of the year when weather allows. That location is by the main street on Conington Road which is only 0.1 mile away from the proposed location of the Adana Premier Store.

Furthermore, proposed Adana Premier store location is in a residential area with green space (currently, daily used in major by families with children) including three large benches, grass landscaping and other sitting options in front of it. This potentially makes the proposed location an attracting place for more street drinkers (Annex G).

Additionally, a new off-license shop is highly likely to increase the litter, waste and street fouling in the direct neighbourhood.

Typical examples of litter, waste and street fouling that may cause problems include food packaging dropped by customers, discarded and broken bottles, cans, promotional leaflets (flyers) and posters, and people who have consumed too much alcohol and urinate and vomit in the street.

Important fact is that there are no litter bins in the vicinity the proposed location of the Adana Premier store. Does the applicant consider sponsoring a litter bin outside the proposed business?

Does the applicant planning to arrange for the area around the proposed premises to be cleared of litter and fouling on a regular basis, and always at the close of business?

5. Protection of Children from Harm:

I am particularly concerned about the proximity of the proposed shop to residential areas, the nearby new playground and the potential harm it may pose to children in the community. One of the primary reasons for my objection is the close proximity of Adana Premier Store to a playground situated a mere 50 yards away from the proposed business

location. The "Protection of Children from Harm" planning objective is designed to safeguard the well-being of children, and I firmly believe that granting an alcohol license in such close proximity to a recreational area for children is not in alignment with this objective.

Alcohol establishments inherently pose potential risks, including increase of street drinkers and associated noise, disturbances, and the potential for anti-social behavior. These factors could negatively impact the peaceful and safe environment that should be maintained around areas where children congregate.

6. Opening Hours:

Regarding the Change of Use Class, Lewisham Council's conditional decision letter dated 29 February 2012 with LE/150/D/TP reference number advises under the Additional Conditions that:

- a. "2. The premises shall be open for customer business between the hours of 22:30 and 07:00 on any day of the week."
- b. "No deliveries shall be taken at or despatched from the site outside the hours of 7 am and 8 pm on Mondays to Fridays, 8 am and 1 pm on Saturdays, nor at any time on Sundays or Public Holidays."
- c. However, the current premises licence application doesn't address any of these points.
- d. Furthermore, I am not convinced that the assigned Use Class allows an Off License shop.

7. Incoming Deliveries (Unloading):

According to the planning permission and its conditions (**DC/06/062620/X**|The demolition of the existing buildings on the site of 72-78 Conington Road SE13 and the construction of a seven to ten storey building, incorporating balconies, comprising 3 commercial units on part of the ground floor, 187 one bedroom, 56 two bedroom and 27 studio self-contained flats, together with associated landscaping and provision of bin stores, bicycle stores, 9 motorcycle parking spaces and 50 car parking spaces at basement level with access onto Conington Road.):

- a. The paved route along the front of the proposed Premier Store is primarily a pedestrian zone. Access within this zone is controlled by the use of lockable bollards and turning head for emergency access.
- b. The applicant doesn't address how the daily deliveries are planned to the proposed store. Do they plan to use the pedestrian only-zone for delivery trucks?

In light of the above, I respectfully request that the Licensing Authority carefully consider the potential negative impact of granting the alcohol license to Adana Premier Store. I believe that the objectives outlined in the Licensing Act may be compromised, and the well-being of the community, including myself as a resident, may be adversely affected.

I would appreciate the opportunity to present my objections in person at any relevant hearings or meetings regarding this license application. Please inform me of the date, time, and location of such proceedings.

Thank you for your attention to this matter. I trust that the Licensing Authority will thoroughly evaluate the potential consequences of granting the license in question.

Sincerely,

Annex A (Freehold Title Copy)



GOV.UK

Search for land and property information

Title register for:

Unit D Adana Building, Conington Road, London, SE13 7LH (Freehold)

Title number: TGL394599

Accessed on 08 November 2023 at 18:40:36

This information can change if we receive an application. This service can not tell you if HM Land Registry are dealing with an application.



This is not an official copy. It does not take into account if there's a pending application with HM Land Registry. If you need to prove property ownership, for example, for a court case, you'll need to order an official copy of the register.

Register summary

Title number	TGL394599
Registered owners	St James Group Limited Berkeley House, 19 Portsmouth Road, Cobham KT11 1JG
Last sold for	No price recorded

A: Property Register

This register describes the land and estates comprised in this title.

Entry number Entry date

1	LEWISHAM
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The Freehold land shown edged with red on the plan of the above title filed at the Registry and

Annex B (Leasehold Title Copy)



GOV.UK

Search for land and property information

Title register for:

Unit D Adana Building, Conington Road, London, SE13 7LH (Leasehold)

Title number: TGL468989

Accessed on 08 November 2023 at 18:44:06

This information can change if we receive an application. This service can not tell you if HM Land Registry are dealing with an application.



This is not an official copy. It does not take into account if there's a pending application with HM Land Registry. If you need to prove property ownership, for example, for a court case, you'll need to order an official copy of the register.

Register summary

Title number	TGL468989
Registered owners	Meridian South Limited Unit 2, Stone Terrace, Buxton Road, London E4 7FP
Last sold for	£87,500 plus VAT

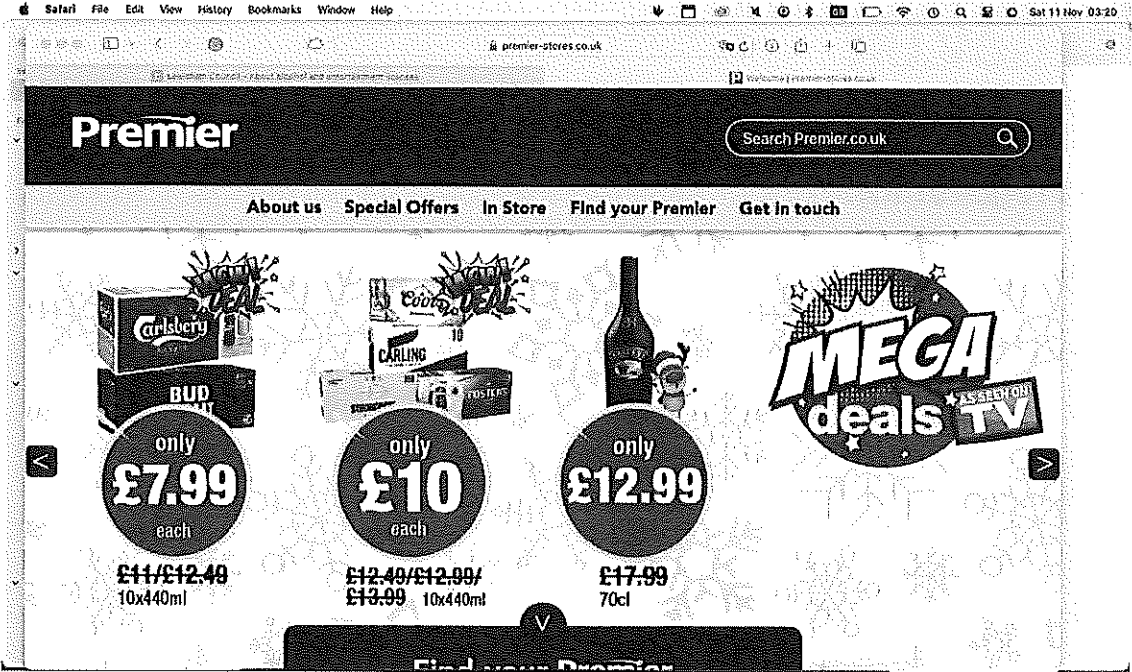
A: Property Register

This register describes the land and estates comprised in this title.

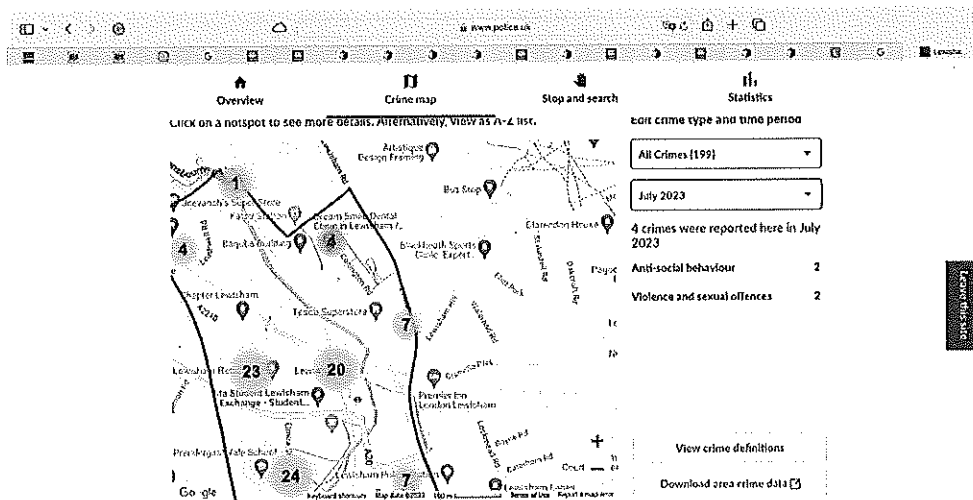
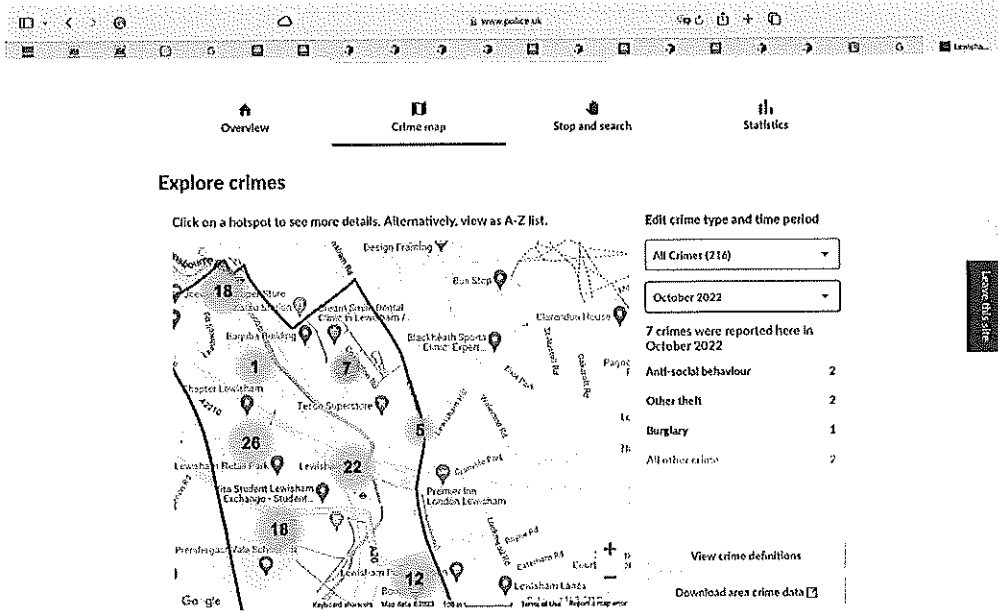
Entry number	Entry date	
1	2017-03-09	LEWISHAM

The Leasehold land demised by the lease referred to below which lies within the area shown edged

Annex C (Screen capture of Premier Stores Alcohol Promotions)



Annex D -1 (Lewisham Crime Hotspots Map, Police Data [Location Highlighted in Blue])

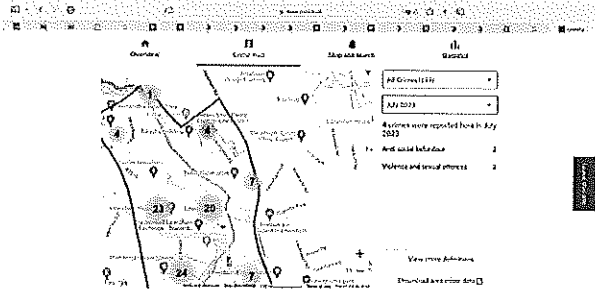


About this crime map

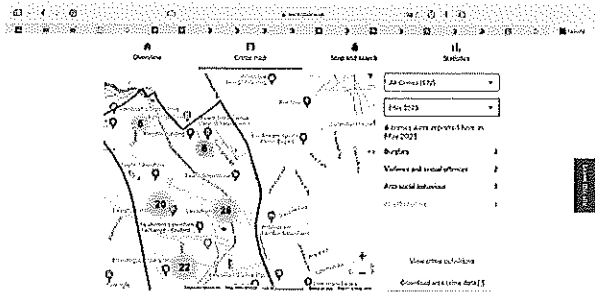
This map uses data from local forces. The hotspots give only a loose idea of where crimes happened. Actual locations and details of crimes are kept anonymous.

Please note that not all crimes that occurred can be shown on the map.

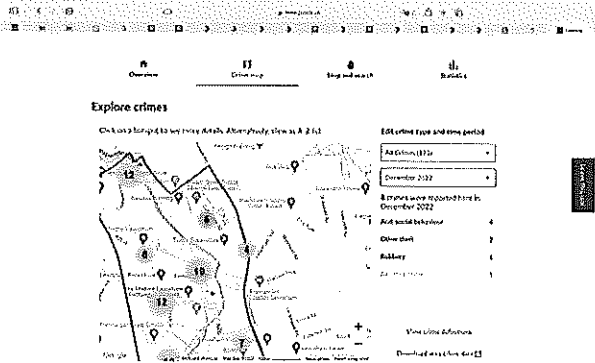
Annex D - 2 (Lewisham Crime Hotspots Map, Police Data [Location Highlighted in Blue])



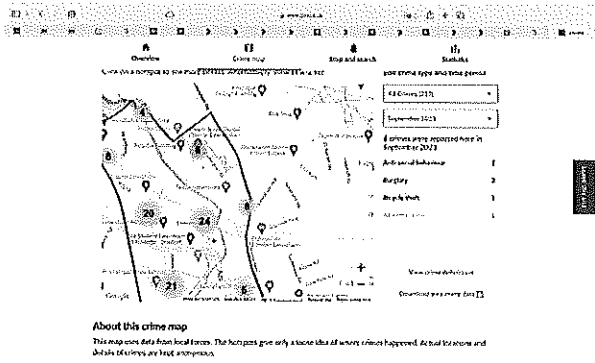
About this crime map
 This map uses data from local forces. The hotspots give only a basic idea of where crimes happened. Actual locations and details of crimes are kept anonymous.
 Please note that not all crimes that happened can be shown on the map.
 151 incidents of Crime occurred in Metropolitan Police Service could not be mapped to a location and therefore are not on this



About this crime map
 This map uses data from local forces. The hotspots give only a basic idea of where crimes happened. Actual locations and details of crimes are kept anonymous.
 Please note that not all crimes that occurred can be shown on the map.
 723 incidents of Crime occurred in Metropolitan Police Service could not be mapped to a location and therefore are not on this

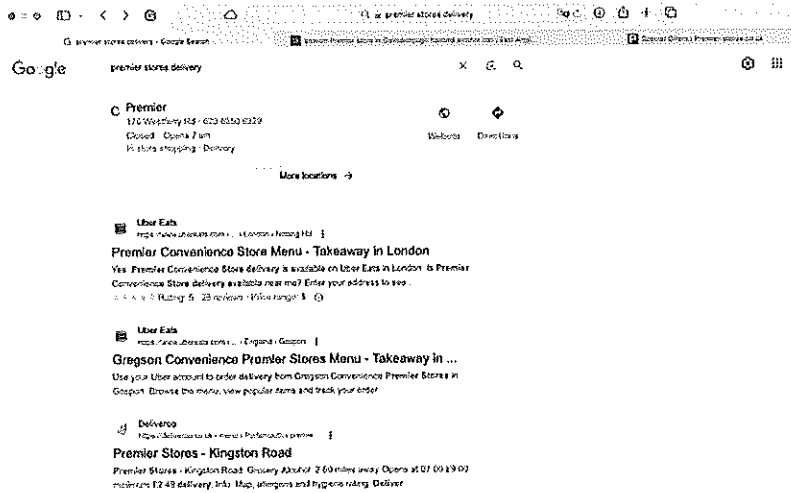
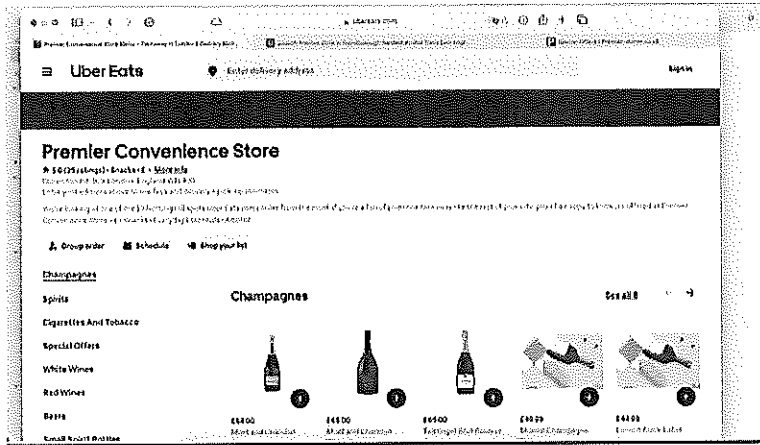


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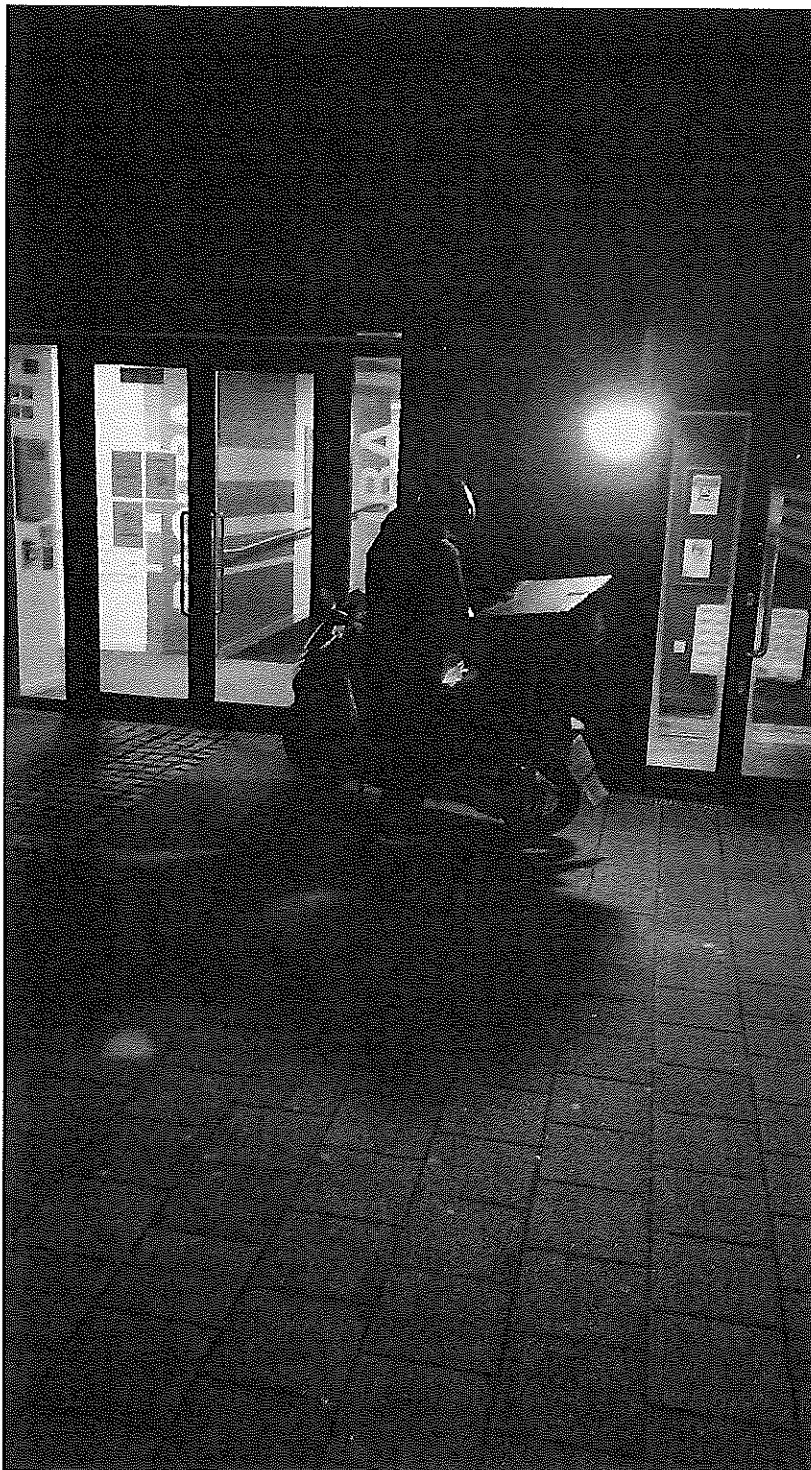
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Annex E (Premier Stores offering delivery services)



Annex F (Video: Illegal Use of Pedestrian-Only Zone by Delivery Motorbikes)

Note: Video is embedded in the document and can be played.



Annex G (Proposed location within existing secluded green space)

