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Your ref: Silks2 Variation  
Our ref: Silks2 Variation

9<sup>th</sup> February 2024

**Objection to full variation application in relation to Silks (2) 177 – 181 Rushey Green Catford SE6 4BD.**

Lewisham Police Licensing acknowledge receipt of an application for a full variation to the licence for the above-named premise.

The requested variation is as follows:

1. To add off sales for pre purchased alcohol only.  
**Currently they have ON sales only.**
2. To change seasonal variation from specific days to “anyday preceding a bank holiday until 5am. Times for activities will remain the same”.  
**Currently they have specific dates.**
3. To extend closing times for Sunday to Thursday nights until 3am.  
**Currently Closing time Sunday to Thursday is 2am.**
4. Increase the hours on a Thursday to Sunday for live and recorded music, dance and late-night refreshment until 3am.  
**Currently 9 to 2am Sunday to Thursday and 9 to 4.30am Friday and Saturday.**

5. Increase hours of alcohol on a Thursday until 2am.

Currently this is 1.30am.

6. Increase hours of alcohol on Sunday to 2.30 am

Currently this is 1.30am

7. Increase the hours on a Sunday to Thursday until 3am for late night refreshment.

Currently this is 2300 to 0200am.

Police object to this application under the following Licensing objectives:

Prevent crime and disorder.

Public safety

Prevent public nuisance.

Prior to explaining fully the reason for police objecting, police provide a time line of events for this venue and the problems that have been encountered:

This Venue (and this licence) was originally Nuvo Lounge. It was a dormant licence which had outstanding fees .

When Silks first opened it was on a different licence( Silks 1) that has since been revoked (27/10/2022). Why did the applicant not use this licence in the first instance and why is it choosing to use this licence now?

27/10/22 – Licence review (standard section 51). The committee revoked the licence ( Silks1) after a series of violent incidents.

1/10/22 – Victim punched in the face by security on the door.

30/10/22 – Violent disorder (during the statutory period of appeal). No appeal has taken place and police understand this is due to a back log at the courts..

11/22 – Summary review.

13/12/22 Change of DPS to Mary Egwenu

20/4/23 – Meeting took place between police and DPS. 5 Breaches of the licence were found and a form 694 notice of alleged offences was issued.

12/5/23 – An action plan was put in place signed by Silks.

18/3/23 - Disorder and loss of control, a scuffle took place inside and outside the venue. CCTV shows door staff trying to keep people inside knowing that council CCTV are watching the venue.

30/5/23 – Breach of the licence. Not using accredited SIA (door security).

6/6/23 – Action plan in place. Premises licence holder states another SIA company are coming to look at the premises.

16/6/23 – Breach of the licence, not using accredited SIA.

29/6/23 – CCTV footage from 25/6/23 when around 4am, 3 males armed with machetes and zombie knife in the area of Plassy Island carpark behind Silks. Silks security called this in and it was not attributed to Silks.

3/7/23 – Email from Premises licence holder stating an accredited security company will be taking over that weekend.

29/9/23 – Action plan breach. Condition agreed that Silks premises licence holder would supply weekly list of SIA working on site. Also they have not provided details of accredited SIA company being used.

10/10/23 – Silks premises licence holder makes contact and states they are in the process of changing SIA.

31/10/23 – CCTV at EROS house informed police there have been scuffles outside Silks again and premises licence holder has been in contact and have stated they have fallen out with SIA door team and are looking to renew door staff again. In the meantime they are using old door staff.

6/11/23 – Email sent to designated premises supervisor and Premises licence holder informing them they are breaching licensing conditions again due to not using accredited door staff.

9/11/23 – Informed by Silks designated premises supervisor that accredited door team in place called Senturian Security Services.

27/10/23 – Police visit the premise with SIA staff who confirmed the company being used are NOT an accredited company and also a member of the door staff tried to block police licensing officers from entering Silks.

28/1/2024 – Silks held a TEN (Temporary Events Notice) extending their hours from 0400 to 0600 hours. This was approved by police for the reason this was a ticketed event for clientele aged 50 and over. The expectation being the event would be less likely to end in violence due to the age of the attendees. The event passed without incident.

Silks is a night Club which is situated on a one-way section of the South Circular in Catford South East London.

The road directly outside the premise is on a red route frequently used by traffic going to and from London. It is a busy bus route and a major junction.

The road is also a busy high street for local residents with flats above the many shops and also large social housing complexes on either side of the road behind the shops. The roads coming off the main high street are lined with terraced houses. With limited parking. There is a carpark directly behind Silks which can be reached by going through an alley that runs alongside Silks.

In close vicinity to Silks there are various other night-time economy venues none of which are open beyond 4am. In fact the only one that is open beyond 4am is a function room and 4am is only on a Friday, Saturday and Sunday when it is open, which is infrequent.

As can be seen from the timeline of incidents above, Silks has been a problem venue over the past two years and although changing both ownership and then designated premises supervisor the problems have not been resolved. In the last 2 years the level of violence encountered outside the venue has ranged from someone trying to drive a vehicle into the front of the venue, a female being set upon by a mob, one of which smashed a Jack Daniels bottle over her head, doormen using mag light torches as weapons, someone being kicked unconscious and another person being pushed in front of a bus. Most of these incidents being either caused by patrons of Silks or the door staff.

Police have also been called to suspects with knives in the car park and on arrival knives have been found hidden under vehicles. Although this incident was called in by door staff of Silks it remains a problem that patrons of Silks could have been the intended targets as who else is in that vicinity in the early hours of the morning?

Police object to the extension of hours under the licensing objectives of prevent crime and disorder, public safety and public nuisance as we have been working for the past two years to prevent further incidents of the level of violence we have encountered. Patrons drinking alcohol for longer periods could potentially fuel further violence. The premises have not displayed a competent dispersal policy and indeed their patrons tend to spill across the busy South Circular with a complete disregard to the fact this is a busy main road causing danger both to themselves and other road users.

The Premises Licence holder and the Designated Premises Supervisor have not taken seriously the need for accredited SIA and were neither forth-coming or accountable when they continually breached their licensing conditions when it was put to them. Either ignoring police emails or making excuses.(attached)

It was only just before Christmas 2023 that accredited door staff were in place and as Silks seem to be unable to maintain a good working relationship with accredited door staff it remains to be seen if this is a long term arrangement as it has only been in place for such a short time and over the winter period which is an established quieter period for night time economy venues. The real test if things are working better is when the warmer weather arrives, and people start to venture out again.

Police do not feel confident that matters have been resolved with regard to the level of violence and the lack of dispersal at this venue and are yet to see the impact this new SIA company have.

The applicant is also seeking to have off sales of alcohol. Police understand this is due to the female being hit over the head with a Jack Daniels bottle which was sneaked out of the venue by a patron in the clubs VIP area. The applicant we understand is of the view that if they have off sales they can decant the drink from a glass bottle to the plastic bottle so the patrons can take their bottles of drink with them.

Police believe this will encourage the patrons to hang around outside the premise for longer as they now have their drinks still and will make it even more difficult to disperse people. It potentially could also cause more littering and encourage the patrons to drink more as they can now buy their alcohol to take home with them. Alcohol consumption is also a cause of violence. So potentially this could lead to more violence.

An alternative to this could be to sell half bottles or smaller bottles which they could decant inside the venue negating the need for off sales or the bottles to be taken outside of the venue. They would also be able to monitor if their patrons are drunk. Another alternative could be reducing the time they could sell full bottles of alcohol so less remains negating the need to take away the remainder.

It must also be taken into consideration that if this venue is allowed to open longer and be the last venue to be open in the vicinity, patrons from the other venues may venue hop and all end up in this venue at closing time causing more problems at closing time. There would be more people milling around onto the busy south circular, intoxicated.

An alternative could be to open earlier and offer seated meals where their patrons could have food prior to or with alcohol. (In keeping with the Lewisham statement of licensing policy)

After considering the application, conditions offered by the applicant and taking into account the location of the premises and its environs Police licensing feel that the premises will undermine not only the Licensing objectives but also greatly affect the local residents and the quality of their lives. The applicant has failed to consider 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. Further to this, there are already several venues in the immediate surrounding area which is at saturation point with this kind of venue.

Police would also like to high light key paragraphs from Lewisham's statement of licensing policy 2020-2025.

#### Public health – 2.22

This further stresses the need to ensure licensees undertake responsible management around the sale of alcohol in both the on and off trades, and have regard to the licensing objectives of public safety.

2.24 Key aim 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.

#### Prevention of crime and disorder

7.3 The council and licensing authority recognises that well managed licensed premises can make a valuable contribution to the community and local economy, however, poorly run premises can become a source of crime and disorder, especially if those premises offer late night alcohol, entertainment or refreshment.

#### Policy 11 Hours of sale and location

The licensing authority has developed the following preferred operating hours for types of premises dependent on the area within which they are located (Town centres Lewisham and Catford)

Night clubs Preferred latest end time Friday and Saturday 2am, Sunday to Thursday 1am.

#### Vertical drinking

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 (section 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 appreciate the licence on this premise has changed from Silks and now Silks 2 and that the DPS and PLH have changed in the course of two years however we have not gone any length of time when this premise has not come to police attention whether that be for violent behaviour from the patrons, door staff and people hanging around the vicinity and also breaches of the licensing conditions as well as very poor dispersal of the patrons.

Kind regards

Pc Gillian Pearce