

N Objection 1

Sent: 03 April 2021 18:44

To: Licensing

Subject: Licensing application Aladdin's Cave Loampit Hill se13 7sx

Dear Sir/ Madam

What - Contend licensing

Where - Aladdin's cave SE13

Reason for contention - residential area with young families who would not benefit from large groups of adults drinking alcohol and listening to loud music in close proximity. Strongly suspect surrounding roads (particularly Somerset gardens) will be used for parking vehicles and unsocial behaviour impacting residents and young children often playing on scooters and cycles on the pavement during day and early evening.

Yours sincerely

Objection 2

Sent: 07 April 2021 16:35

To: Licensing

Cc: chair@st-johns-soc.org; McGeevor, Cllr Sophie; Penfold, Cllr Stephen; Adefiranye, Cllr Obajimi; chair@brockleysociety.org.uk

Subject: Re Aladdin's Cave - application for alcohol license

Dear Sirs,

Please could I object to the application for an alcohol license to Aladdin's Cave, Loam Pit Hill, Lewisham, SE13.

We already have a very good café (Middleton's) and local community pub (The Talbot) almost opposite. On Saturdays we have Brockley Market. All these serve the area well. Having alcohol sold from 10am – midnight, 7 days a week, seems excessive for the area. It will also be a huge disturbance to those who live nearby and I am unsure that the selling of alcohol on a school route (mostly primary children) and next to a bus stop is to be encouraged.

I am also concerned that owners of Aladdin's Cave which is subject to an Article 4 Direction Conservation Area (the St Johns Conservation Area) have made changes to the building without asking for planning consent, and have also stated their intention to make further changes to the premises. Not really the sort of people I'd want to trust with an alcohol licence in such a sensitive position.

I would also like the following points to be taken into consideration in my objection:

- it is very likely to promote public disorder in the immediate local area at close of licensing hours.
- it is very likely to cause a public nuisance with noise pollution and anti-social behaviour
- it is questionable whether the building and its backyard is safe for members of the public to gather in large (or any) numbers. A former planning application to demolish the building stated that the building is beyond repair. While that may be an exaggeration to support demolition I would think that before the licence is granted the building needs to be renovated to conservation standards. As it stands at the moment it is an accident waiting to happen.
- I am concerned about the terms of the license regarding what type of venue they plan to open. It appears likely that the large backyard outdoor space might be used by members of the public. If so, the risk of noise pollution is of big concern especially since it is rumoured (albeit unsubstantiated) that they intend to use the area as a venue for live music.
- in the past there have been issues with large bonfires being lit in the Aladdin's cave backyard. The fires have been visible to a large number of local residents and neighbours and the pall of smoke being visible over the railway in Lind Street. The environmental pollution as well as noise from music and loud voices is of great concern.

Objection 3

Sent: 10 April 2021 09:56

To: Licensing

Subject: Sell off alcohol at Aladdins cave SE13 uSX

Dear Licensing Team,

I would like to oppose this as of the following:

1. My house is on cliff terrace, which is at the back off Aladdins cave, and I do not want the noise, loud music etc from a drinking establishment at the back off my property and I'm sure all my neighbours will agree with me.

2. There is a pub opposite Aladdins Cave on Tywritt Road, & The Rising Sun on Loampit Hill, so I cannot see why we need another.

I have been a licensee for many years, and so has my Husband and we are aware of the pitfalls to running a Bar, Restaurants etc especially Bars either the loud music, drug problem, drunkenness etc.

I would appreciate if you would not let this go through I don't see the being any benefits to the area for this kind of place and im sure property prices would also suffer.

Your sincerely

Objection 4

Sent: 10 April 2021 14:38

To: Licensing

Subject: Aladdin's Cave, 72 Loampit Hill - License application

Aladdin's Cave, 72 Loampit Hill - License application

Written Representation – Sent Saturday, 10 April 2021

To the Licensing Authority

We are deeply concerned about the application for a Premises licence for Aladdin's Cave, and their proposal to change the antiques and salvage shop to a drinks venue with hours extending beyond their current shop hours to 10:00 am – 00:00, 7 days per week.

Aladdin's Cave has several close residential neighbours, sharing boundary fencing with some of them. We ourselves are close enough to hear conversation in the yard and their telephone ringing. Our home directly overlooks the Aladdin's Cave rear yard, and we have no confidence that we will be in any way protected from the increased noise, light and smell pollution, and potential anti-social behaviour that would likely occur.

If you have any queries regarding the points raised below, please do not hesitate to contact me.

The following points detailing our past experiences with Aladdin's Cave demonstrate why we are so worried by their proposed change of use and extended hours and potential lack of adherence to the rules of the licence:

- We have many times complained to CER about their months of huge, toxic bonfires throughout lockdowns, which only resolved once they had run out of stock to burn; for years we have battled cars, vans and trucks either blocking our drive or parking on it whilst visiting, loading or unloading from Aladdin's Cave; when they had illegal parties during lockdowns our front garden was used as a toilet; in the past when they were fully stocked, we endured years of the pavement outside being used as an extension of the shop, often extending down past number 70 Loampit Hill and allowing passage through in single file only, with dangerous piles from the yard from either side; our grown daughters hate walking past on their own having endured years of wolf whistles.

Concerns in respect of this license application, grouped by the licensing objectives:

- **the prevention of crime and disorder**
 - Aladdin's cave is understood to currently have planning use class B8 (storage and distribution) and so I believe that operating as a bar would not be a legal use of the site without planning approval for change of use
 - Concern about people congregating outside or queuing to gain access at the front of Aladdin's Cave and the properties on Loampit Hill. The women of our household have expressed major concerns about having to pass through this as they make their way home. Please note there is a bus stop at the entrance to Aladdin's Cave where the general public (including children) regularly wait.

- **public safety**
 - Aladdin's Cave is in close proximity to the adjoining railway line with low wire fencing the only barrier at points
 - The site itself may represent health and safety concerns - e.g., floor is uneven, site is used as storage for building materials/antiques/other miscellaneous items
 - Aladdin's Cave is situated on a bend in the road where Lewisham Way transitions into Loampit Hill heading towards Lewisham Town Centre. Currently the number of near misses and accidents we observe is of concern, but with the potential for illegal parking, dropping off and increased footfall the potential for an accident is genuine worry
 - The toilet facilities may be inadequate for the change of use. For example, when Aladdin's Cave had a number of large illegal gatherings during lock-down our front garden was used as a toilet.

- **the prevention of public nuisance**
 - The operating hours (10:00 - 00:00, 7 days per week) seem excessive for a licensed premise in a residential area, and would overlap with times when local children go to and from school
 - Late night opening represents a potential noise problem for neighbours in Loampit Hill (adjacent), Somerset Gardens (which adjoins the rear of the site) and Whidborne Close/Cliff Terrace (across the railway)
 - This is surrounded by purely residential premises and therefore noise, light and food odours will be detrimental to the quality of life, especially sleep disturbance.
 - Noise as a particular issue - both in respect of music noise and crowd noise - is likely to be exacerbated by the proposed outdoor format and lack of acoustic barriers.
 - The local pub in Tyrwhitt Road (The Talbot) has a history of noise concerns from local neighbours and imposes constraints on use of their outdoor space after certain hours to mitigate these concerns
 - The potential for nuisance caused by smoke or cooking odours is high given the proposed outdoor food market format

- Rubbish removal and deliveries will cause further disturbance, presumably outside the proposed opening hours.
 - Because of the increase in footfall of potential customers, there will inevitably be an increase in the number of vehicles parking and dropping off along the red route and bus lane directly outside the residences of Loampit Hill and Aladdin's Cave. As a number to these Loampit Hill properties have off street parking, we know from experience that visitors to Aladdin's Cave regularly park on this private land without permission. Therefore we can assume that this will increase with the proposed change of use. During lockdown there were a number of gatherings at Aladdin' Cave and cars were parked on the Red Route down Loampit Hill towards Lewisham Town Centre. The parked cars also blocking the driveway exits on Loampit Hill.
 - The potential for U-turns on Loampit Hill by taxis and drop-offs and pick-ups is increased with potential for accidents
 - Somerset Gardens is a very quiet residential road with parking restrictions, but due to it's an oval shape it could use it as a turning point therefore increasing traffic along this narrow road
- **the protection of children from harm.**
 - Site is in close proximity to two children's nurseries (Busy Bees Lewisham on Somerset Gardens, and Bright Horizons Brockley on Lewisham way), and nearby Ashmead Road Primary School. Children would be coming home from school/nursery past the site during proposed opening hours.
 - Children living locally may be impacted in their schoolwork or sleep patterns due to noise from the site
 - If customers did not remain in the proposed area of use of the site, and/or are allowed to use the rest of the property, they could from other parts of the site overlook neighbouring houses, with visibility into adjoining gardens and properties where children play, and rear-facing childrens' bedrooms.

Due all of the above there may be an increase in police activity in dealing with issues that arise from the change of use at Aladdin's Cave

Please also note that we see bats in the evening during the summer and believe the lights, noise and food odours will adversely affect them and their habit. It has been reported in Aladdin's Cave's previous planning application (RT-MME-126620-02) to build new flats on the site that a bat corridor may exist here and requires further monitoring.

Please consider the granting of this Licence application for 72 Loampit Hill, SE13 7SX from the viewpoint of concerned local residents.

Objection 5

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Date: 10 April 2021 at 15:46:46 BST

To: licencing@lewisham.gov.uk

Subject: Licence Application for Aladdin's Cave 72 Loampit Hill Lewisham SE13 7SX

I am writing to present my objections to the above application, at the Aladdin's Cave site, which I believe is being made by persons working for Brixton Jamm who intend to manage the licence. I appreciate that my objections to this application can only be considered regarding the four licensing objectives. As a licence is not currently in place, it could be argued by the applicants that there is no evidence to show that their objectives will not be met. However, given the rather basic comments and limited explanations on their application, there is also little evidence that the licence holders would actually successfully promote the objectives let alone implement them.

I apologise for the length of this representation, but the information presented in the application throws up many questions and possibilities. The following points, based on my current experience and what I believe is factual information, indicate that the granting of licence has the potential to result in an increased risk of public nuisance and safety issues for the local community, the possibility for crime and disorder and, most importantly, the need for protection of children from harm.

The proposals, as I interpret them, are for what will be 'substantially an outdoor facility' with a bar, seated area and stalls including street food. This application would allow the sale of alcohol for consumption both on and off the premises [from 10am until midnight](#) every day (with the option to apply for later closing times on holidays), play amplified recorded and live music [until 11pm](#) every evening and hold other deregulated activities such as showing films/videos. Additionally the application includes the provision of 'late night refreshment' (whatever that means) [between 11pm and midnight](#). Interestingly this part of the application states that this will be provided indoors, as well as outdoors. Where will this indoor provision occur as there does not appear to be any buildings available in the designated licensed area for indoor use, unless they will take place enclosed in the containers shown on the map.

My objections are as follows.

PUBLIC NUISANCE TO THE LOCAL COMMUNITY

(Public Nuisance, and Prevention of Harm to Children issues)

Given the 'outdoor use', the most obvious concern and a major objection is that of noise, caused by patrons but also by amplified music (and commentary on recorded videos whether music, dance or sports). This will have an impact, particularly in the evenings, to neighbours residing around the site and is likely to become an ongoing public nuisance. Fortunately my hearing loss is only designated as mild, however, in my garden I can hear the warning sounds of doors closing from trains in the cutting at St Johns station, which is further away than Aladdin's Cave. This indicates how far sound will travel in this elevated area of land.

How will the applicants actually enforce their statement that 'noise or vibration shall not emanate from the premises so as to cause nuisance to nearby properties'? A tent or awning will not contain

the noise to anywhere near the same extent of a building. I was not the only resident disturbed this week from noise from a group of people in a private garden next to the proposed licence site, which could be heard inside my property with the windows closed. Imagine the effect of the increased volume of a crowd, plus background music, every day and evening.

There are babies and young children living around the site, and others attending the two local nurseries, who need to nap during the day and go to sleep early in the evenings. There are other, older children who need to do homework and exam preparation after school hours. The increase in noise caused by this development could be disruptive and potentially even distressing, and could impact on their mental and emotional well being.

Significantly, there is already evidence that the effect of a licensed property in the immediate vicinity can cause a public nuisance. The Talbot is an established public house opposite the proposed site, although it does not front the main road. It is primarily an indoor facility, which limits noise disturbance, however usage of the small seated area outside has caused complaints from neighbours, even without the added issue of amplified music. As a result, the evening use of this area has been restricted. Therefore, it does not make sense to grant a licence for a much larger outdoor provision in such close proximity, which can only exacerbate the public nuisance issues during opening hours.

SAFE AND APPROPRIATE MANAGEMENT OF THE PREMISES AND PATRONS.

(Public Safety, Prevention of Harm to Children and Prevention of crime and disorder.)

It appears the application only has to deal with the public safety of patrons in the licensed area and deals solely with the practicalities of fire safety and possible accidents with glass. There does not appear to be any need for taking responsibility for the safety of customers and as they leave the site or members of the public passing the site.

Surely when operating a premises that has a prime function to sell alcohol, there must be consideration as to the effects of alcohol in terms of physical and mental impairment of the customers. The only entrance/exit to the site is onto a public pavement and busy main road. There is also a bus stop supporting four routes immediately by this entrance. There is no barrier to prevent people leaving the site and stepping into the main road.

There are two nurseries within 50 metres either side of the site, a local nursery and primary school in Ashmead Road and the college (with many students under the age of 18 and vulnerable adults) within 100 metres of the site. At certain times of the day there is a very heavy footfall outside the Aladdin's Cave site. There is the potential for safety issues with parents trying to negotiate queues at the bus stop with babies, toddlers and young children, and teenagers making their way home from school/college.

The application states that contact numbers will be 'made available for patrons requiring a taxi' but as the site is on a red route with a bus lane operating at all times, where will the waiting/pick-ups take place? Residents in nearby roads such as Somerset Gardens, Sandroock Road, Tyrwhitt Road and St. John's Vale would find it a nuisance to be disturbed late at night by revellers slamming car doors, or cars parked by designated drivers blocking access.

The application indicates that alcohol will only be sold in the licensed area but can be consumed off the licensed premises. The applicants do not stipulate what they plan to do about the rear of the premises, as the licensed area only covers the front third of the site? There is no indication that this will be fenced off to ensure the patrons do not utilise this area of the site, which would be unlikely to pass health and safety regulations for public usage in its current state. If patrons were allowed or even encouraged to utilise this area it could become a safety risk to themselves.

Even without it being an area of designated use, if patrons were to gain unofficial access to this area

it would give them opportunity to see into the private gardens of 70 Loampit Hill and the terrace of houses in Somerset Gardens. This happened under the current usage but customers were looking at items for sale during the day. At night they would see the rear facing rooms where there are family bathrooms and children have their bedrooms. This would be a safeguarding issue.

Additionally, there is the possibility of crime and disorder issues with the possible use of drugs or inappropriate behaviour in this area, as it would be unsupervised. The application does not state how the 'regular checks by management to prevent the use of drugs by patrons' will be undertaken but any access to this area, would provide a secluded area for such activities.

PERSONAL SAFETY ISSUES

(Public safety, Prevention of Crime and Disorder)

Whilst I am aware that the licensing application is a general concern among our local community, I would also wish to make some personal comments.

Firstly, having lived in Somerset Gardens for over four decades, my partner and I value the calm and tranquility of our garden, listening to the birdsong by day and bat spotting in the evenings. Due to my partner's degenerative neurological condition, our future outdoor time is likely to be based in our garden. It has made us both anxious and distressed that this is likely to be curtailed by the noise and music emanating from the proposed licensing site, particularly in the evenings. There are other vulnerable neighbours and families with young children in similar positions due to medical conditions.

Secondly, when buying our property we 'inherited' the private land in the middle of Somerset Gardens. Since retiring I have spent many hours and finances developing this feature. Unfortunately, despite my polite signs pointing out that this is private property, I regularly find alcoholic drinks containers (not always empty) left on the garden as well as on the verges leading from the main road, which is indicative of the existing issue of alcohol consumption in public in this area.

Sadly I have also found the residue of drug taking apparatus and empty packets of medication which I have had to dispose of. I am frequently having to confront men, often in the dark, and ask them to leave the bushes when they use it as a public urinal (the older ones claim prostate issues whilst the younger ones admit they have drunk too much). This also occurs in bushes in neighbours gardens and is also recorded on CCTV at the side of the Busy Bees nursery.

Whilst I accept that foxes and cats will leave their faeces there, I am appalled at having to deal with human excrement left after dark (the toilet paper/tissues are a giveaway). Occasionally I have awoken to noise created by people who have been partying and have decided to stop off on the way home in what they think is a public green space. Whilst this is personal nuisance for me it also has a knock on effect for the neighbours and their children and I can see the potential for this problem increasing if the licence is granted. Incidentally there is also the possibility that this sort of behaviour can occur on the other local area of access to green space in the churchyard of St. Johns church.

The granting of this licence would not enhance the neighbourhood in any way but does increase the likelihood of law and order issues to the detriment of residents. If Aladdin's Cave proposed a different sort of development, preferably one more suited to outdoor usage in a residential area that did not involve opening late in the evening, I would be happy to consider its support.

Thank you for the prompt correspondence from your office clarifying my queries for the procedures for objection. I would welcome your acknowledgment of this representation.

Kind regards

Comments not related to licensing objectives but causing concerns to immediate neighbours of the Aladdin's Cave Site.

Whilst these following comments cannot form part of the decision making process in relation to the application for a licence, I am concerned about the ease by which a licence can appear to be granted if the application 'ticks the appropriate boxes', regardless of considerations as to the how appropriate its position will be in the local community.

I do not accept that this is considered to be a suitable commercial enterprise in a mainly residential neighbourhood. The site is situated in St Johns Conservation Area (but adjoins Somerset Gardens Conservation Area and is opposite Brockley Conservation Area). There are already a number of established licensed premises for on and off site consumption of alcohol and several restaurants and take-away premises in the immediate area, that the local residents would want to support and utilise once the covid restrictions are lifted. The introduction of these proposals, on what is likely to develop in the near future over the whole site, could result in a loss of customers and revenue for the existing providers at a time when their survival is critical. Financial growth and benefits from the licence would go Brixton Jamm and the owners of Aladdin's Cave, not the local Borough.

Having expressed concerns last year to the Aladdin's Cave staff about the probable affects of their proposals on local residents, I did point out that their neighbours may object to this specific change of usage on the site. This was said in the hope that they would enter a dialogue with us to come to a more appropriate and mutually acceptable plan, that we could support in their aim to 'save the Cave'. (This included both myself and another resident separately offering to buy the land at the back of our gardens so that we could retain it in its natural state. This was refused as we were told that Brixton Jamm would require the whole site). Sadly, not only has this dialogue not happened but they have continued to promote their plan as if its establishment was already a foregone conclusion.

Aladdin's Cave, a private limited company, was registered and designated as retail, specifically the sale of antiques. In the planning permission applied for in 2018, to convert the site to residential accommodation, I believe their designation was class B8 - storage and distribution. Despite the laxity in some planning procedures that covid regulations may have introduced, surely the sale of alcohol and providing a street food market would require permission from the council for a change of usage and consultation with immediate neighbours who would be affected by it. Whilst the covid restrictions put Aladdin's Cave plans on hold, I have been checking the council websites and found nothing to say that has occurred. Therefore I am surprised that a licence application is even being considered for a site that does not appear to have council permission. I am also surprised that both Aladdin's Cave and Brixton Jamm, who as businesses would have legal advice, appear to have accidentally forgotten to apply for this permission. Would the granting of this licence (which they now appear to be rushing through) help them gain retrospective permission for change of usage? Please forgive my cynicism but Aladdin's Cave do have a history of bending rules and regulations .

Objection 6

Sent: 09 April 2021 12:40

To: Licensing

Cc: chair@st-johns-soc.org

Subject: The cave building - objection

I object to the building for selling Alcoholic beverages, as it would disrupt our lives and our children at bedtime. with noise pollution. We live near the train tracks and already have a lot of noise from track works.

Kind Regards

Objection 7

Dear Sirs,

The St John's Society would like to object to the application for an alcohol license to Aladdin's Cave, Loam Pit Hill, Lewisham, SE13.

We already have a very good café (Middleton's) and local community pub (The Talbot) almost opposite. On Saturdays we have Brockley Market. All these serve the area well. Having alcohol sold from 10am – midnight, 7 days a week, with extended hours on Bank Holidays, seems excessive for this quiet, residential area. It will also be a huge disturbance to those who live nearby and we are unsure that the selling of alcohol on a school route (mostly primary children), next to a busy children's nursery and a bus stop, is to be encouraged.

We are also concerned that owners of Aladdin's Cave, which is subject to an Article 4 Direction Conservation Area (the St Johns Conservation Area), have made changes to the building without asking for planning consent, and have also stated their intention to make further changes to the premises. Not really the sort of people we would trust with an alcohol licence, in such a sensitive position.

We would also like the following points to be taken into consideration in our objection:

- it is very likely to promote public disorder in the immediate local area at close of licensing hours.
- it is very likely to cause a public nuisance with noise pollution and anti-social behaviour
- it is questionable whether the building and its backyard is safe for members of the public to gather in large (or any) numbers. A former planning application to demolish the building

stated that the building is beyond repair. While that may be an exaggeration to support demolition we would think that before the licence is granted the building needs to be renovated to conservation standards. As it stands at the moment it is an accident waiting to happen.

- We are concerned about the terms of the license, regarding what type of venue they plan to open. It appears likely that the large backyard outdoor space might be used by members of the public. If so, the risk of noise pollution is of big concern especially since it is rumoured (albeit unsubstantiated) that they intend to use the area as a venue for live music.
- in the past there have been issues with large bonfires being lit in the Aladdin's cave backyard. The fires have been visible to a large number of local residents and neighbours and the pall of smoke being visible over the railway in Lind Street. The environmental pollution, as well as noise from music and loud voices, is of great concern.

I am including the local councillors for St John's as well as Somerset Gardens, as Aladdin's Cave seems to cover two separate wards.

Regards

Objection 8

Sent: 12 April 2021 19:18

To: Licensing

Cc: chair@st-johns-soc.org

Subject: Aladdin's Cave, 72 Loampit Hill - License application

Aladdin's Cave, 72 Loampit Hill - License application

To the Licensing Authority

I am writing to oppose the granting of this licence in any form (full or reduced). I feel greatly concerned by the planning application that has been tabled. My home directly overlooks Aladdin's Cave, and our shared communal garden runs parallel to their property. I oppose the granting of this licence, for the following reasons:

The prevention of public nuisance

- Noise is the main concern - both in respect of music noise and crowd noise - is likely to be exacerbated by the proposed outdoor format and lack of acoustic barriers. Noise levels are already disruptive from the existing premise, so can only assume this would significantly increase if it were to gain a licence to serve alcohol.
- Noise continued - Aladdin's Cave will be unable to take any of the mitigating actions to dampen noise nuisance as detailed in the Lewisham Licensing Policy document due to the open-air nature of the plot.
- The potential for nuisance caused by smoke or cooking odours is high given the proposed outdoor food market format. This is exacerbated by the property being adjacent to our garden.
- Rubbish removal (especially bottles and cans) is likely to add to the noise nuisance, likely at unsociable hours
- Because of the increase in footfall of potential customers, there will inevitably be an increase in the number of vehicles parking and dropping off along the red route and bus lane directly outside the residences of my property. We have already had visitors to Aladdin's Cave regularly park on our private land (driveway) without permission.

In summary, I will be living in a property in which I will be unable to open my windows from 10:00 am – 00:00, 7 days per week, as there will unarguably be an increase in Noise levels. Also, it would significantly impair our shared communal garden which would have a very high level of noise pollution, and air pollution / smoke from the preparation of food.

Public Safety

- Aladdin's Cave is situated on a bend in the road where Lewisham Way transitions into Loampit Hill heading towards Lewisham Town Centre. There is also a bus stop directly outside the premise.
 - o Firstly, there is already a high number of Vans & Cars parked illegally outside the current business (Aladdin's Cave). This causes a danger to public safety, as buses must swerve out of the bus lane, to avoid these parked vans/cars. This causes a danger to both cyclists and road users. If it was to be a food and drinks venue, there would be the need for frequent deliveries, from large vehicles. There is no safe 'drop off' or 'loading' bays nearby the premise, so one would only assume the danger to the public would increase because of this

o As already mentioned, the increase in footfall through taxis, will also create a danger to public safety, from a higher number of vehicles which will illegally park, and also likely make illegal U-turns in the road.

In summary, I feel very strongly that the proposed business would result in an increase in risk, due to the location of the business premise, and increase in vehicles from both a delivery of goods, and the arrival and departure of customers. There is no safe location for these vehicles, and poses an immediate threat to the local community, and those that use the road.

The protection of Children from harm

- Site is in close proximity to two children's nurseries (Busy Bees Lewisham on Somerset Gardens, and Bright Horizons Brockley on Lewisham way), and nearby Ashmead Road Primary School. Given the above public safety concerns, you feel the site being situated so close to two Nursery School's, it will directly endanger their route to their Nursery.

To conclude, I feel very opposed to the plans, which would have a significant impact on myself, but also the surrounding residential area. Whilst I support the development of local business, I feel it is an unsuitable location for a venue to serve alcohol.

Yours faithfully,

Objection 9

Sent: 07 April 2021 11:44

To: Licensing

Cc: chair@st-johns-soc.org

Subject: Aladdin's Cave licensing application

Dear Lewisham Council Licensing

Re: Aladdin's Cave licensing application

I have concerns about the above licensing application.

My property backs onto the railway embankment directly opposite the Aladdin's Cave backyard.

I object to an alcohol license for Aladdin's Cave because:

- it is very likely to promote public disorder in the immediate local area at close of licensing hours.
- it is very likely to cause a public nuisance with noise pollution and anti-social behaviour
- it is questionable whether the building and its backyard is safe for members of the public to gather in large numbers.
- as a resident, I am concerned about the terms of the license regarding what type of venue they plan to open. It appears likely that the large backyard outdoor space might be used by members of the public. If so, the risk of noise pollution is of big concern.
- in the past we have had issues with large bonfires being lit in the Aladdin's cave backyard. The fires have been visible from the rear of our property. The environmental pollution as well as noise from music and loud voices is of great concern.

Objection 10

Sent: 09 April 2021 11:04

To: Licensing; chair@st-johns-soc.org;

Subject: Aladdin's Cave (Loampit Vale) Alcohol License - ISSUE

Hi Lewisham Council,

My partner and I would like to raise a concern and object to the Alcohol License that has been applied for byr Aladdin's cave.

Having visited the event space "Brixton Jamm" (the organisers of the proposed entertainment venue at Aladdin's cave) we have a reasonable idea of what to expect.

Our main concern will be noise, our house backs onto Aladdin's Cave right on the other side of the railway tracks - and our quality of life will be seriously disrupted by the sound of music and larger social groups. This will be a major public nuisance. Also given that this proposed to be largely an outdoor venue this will have major repercussions to sound of a night time and sounds during the weekends.

Secondly, this may bring further crime and disorder to the area, which brings added concern for public safety too. As we have seen evidence of before when we have visited Brixton Jamm. There are various schools and nurseries in the area too and there are a lot of young families that do not want to add any unnecessary threats to the local area.

We really hope that you reject their bid for an alcohol licence such that we can keep our residential area free from any unnecessary public nuisance and crime, and such that we do not have our quality of life deteriorated from the sound issues that this will obviously cause. Especially for us given that our garden backs directly out to their proposed event space.

Objection 11

Sent: 30 March 2021 22:22

To: Licensing

Subject: Licence application for 72 Loampit Hill, SE13 7SX (Aladdin's Cave)

Hi,

I have a number of concerns to raise in respect of this alcohol license application, which are set out below.

I will also be contacting the planning team as I believe this would constitute a change of use for the site, and I do not think there is a corresponding planning application.

If you have any queries or need clarification on any points, please don't hesitate to contact me.

Concerns in respect of this license application, grouped by the licensing objectives:

-
- the prevention of crime and disorder
- - Aladdin's cave is understood to currently have planning use class B8 (storage and distribution) and so I believe that operating as a bar would not be a legal use of the site without planning approval for change of use
 -
- public safety
- - Aladdin's Cave is in close proximity to adjoining railway line with low wire fencing the only barrier at points
 - The site itself may represent health and safety concerns - e.g. floor is uneven, site is used as storage for building materials/antiques/other miscellaneous items
 -
-
- the prevention of public nuisance
- - The operating hours (10:00 - 00:00 7 days
 - per week) seem excessive for a licensed premise in a residential area, and would overlap with times when local children go to and from school
 - Late night opening represents a potential noise problem for neighbours in Loampit Hill (adjacent), Somerset Gardens (which adjoins the rear of the site) and Whidborne Close/Cliff Terrace (across the railway)
 - Noise as a particular issue - both in respect
 - of music noise and crowd noise - is likely to be exacerbated by the proposed outdoor format

- The local pub in Tyrwhitt Road (The Talbot) has a history of noise concerns from local neighbours and imposes constraints on use of their outdoor space after certain hours to mitigate these concerns
- The potential for nuisance caused by smoke
- or cooking odours is high given the proposed outdoor food market format
-
-
- the protection of children from harm.
- - Site is in close proximity to two childrens nurseries (Busy Bees Lewisham on Somerset Gardens, and Bright Horizons Brockley on Lewisham way), and nearby Ashmead Road Primary School. Children would be coming home from school/nursery past the site during proposed opening hours.
 -
 - Children living locally may be impacted in their school work or sleep patterns due to noise from the site
 -
 - If customers did not remain in the proposed area of use of the site, and/or are allowed to use the rest of the property, they could from other parts of the site overlook neighbouring houses, with visibility into adjoining gardens where children play, and rear-facing childrens' bedrooms.
 -
-

Objection 12

From: Olaniran, Frank

Sent: 13 April 2021 18:08

To: Licensing

Cc: Mullin-Murrell, Angela

Subject: New premises licence application - Aladdin's Cave, 72 Loampit Hill, London. SE13 7SX

Dear Lewisham Licensing,

RE: Objection to Premises Licence Application - 72 Loampit Hill, London. SE13 7SX

I am writing to object to the application made by Aladdin's Cave for a premises licence at the above mentioned address.

The applicant is applying for use of an outside space until midnight, 7 days a week. Under 12.4 of Lewisham's Licensing Policy it states:

It is this licensing authority's view that there be a terminal hour of 22:00 for all outside spaces to close, and in some cases depending on the circumstances and proximity to residents this terminal hour will be 21:00.

In light of this, there are concerns that should the application be granted with the proposed times, it would fail to promote key licensing objectives namely the prevention of public nuisance.

Should you require further information, please let me know.

Kind regards,

Frank Olaniran | Crime, Enforcement & Regulation Officer (North Team) | London
Borough of Lewisham | Holbeach Office, 9 Holbeach Road, Catford, SE6 4TW | **Tel:** 020 8314 6538

Objection 13

Sent: 18 April 2021 10:00

To: Licensing

Subject: Objection to Aladdin's Cave - Alcohol Licence application

Dear Sir/Madam,

I am writing to express my objection and concerns on the Aladdin licence application. My main concerns are highlighted below -

Crime and disorder main concerns:

People congregating outside, queuing to gain access, or exiting Aladdin's Cave late at night may contribute to crime and disorder and cause local residents to feel intimidated.

Public urination - People who have been consuming alcohol at the proposed site may utilise the surrounding streets or front gardens of nearby properties to relieve themselves (local residents have already witnessed this happening with people coming from Aladdin's Cave during the pandemic) - what is their plan to respect the local area

Aladdins' Cave have already shown disregard for the law as they have remained open during the Coronavirus pandemic when all non-essential retail was instructed to close.

Public safety

Aladdin's Cave is situated on a bend in the road where Lewisham Way transitions into Loampit Hill heading towards Lewisham Town Centre. Currently the number of near misses and accidents we observe is of concern, but with the potential for illegal parking, illegal u-turns, dropping off and increased footfall the potential for an accident is genuine worry in an already over congested area for cars that impact the high polluted area and the environment.

Prevention of additional Nuisance

The operating hours (10:00 - 00:00, 7 days per week) seem excessive for a licensed premise in a residential area, and would overlap with times when local children go to and from school, and the two nearby nurseries

Noise as a particular issue - both in respect of music noise and crowd noise - is likely to be exacerbated by the proposed outdoor format and lack of acoustic barriers in high residential area

Noise during the day will affect the many residents currently working from home, and noise from late opening will cause sleep disturbance

There is no suitable location for loading relating to an alcohol licenced premises, nor for specific waste removal. Current measures in place for Aladdin's Cave are not suitable, see existing parking related nuisance which will only be made worse by further business being added

The additional footfall and consumption of alcohol on the site is likely to cause increased littering in the local area (local residents already suffer from litter being added to their gardens on a daily basis - this is likely to spread)

Objection 14

Sent: 16 April 2021 23:00

To: Licensing

Subject: Aladdin's Cave -Alcol licence Application

Please see below my objection to Aladdin's Cave -Alcol licence Application:

The prevention of crime and disorder

- People congregating outside, queuing to gain access, or exiting Aladdin's Cave late at night may contribute to crime and disorder and cause local residents to feel intimidated.
- Aladdin's cave already utilizes the pavement outside their store as
- an illegal extension of the shop, often extending down past number 70 Loampit Hill and allowing passage through in single file only, with dangerous piles from the yard from either side. This situation will be much more congested with people congregating outside the front as mentioned above.
- Please note there is a bus stop at the entrance to Aladdin's Cave where the general public (including children) regularly wait, this will only increase the local disorder and make the pavements inaccessible for pedestrians
- Public urination - People who have been consuming alcohol at the proposed site may utilise the surrounding streets or front gardens of nearby properties to relieve themselves (local residents have already witnessed this happening with people coming from Aladdin's Cave during the pandemic)
- Aladdins' Cave have remained open during the Coronavirus pandemic when all non-essential retail was instructed to close
- Bats (protected) have been sighted in the area and the lights, noise and food odours will adversely affect them and their habit. It has been reported in Aladdin's Cave's previous planning application (RT-MME-126620-02 to build new flats on the site) that a bat corridor may exist here and requires further monitoring
-

Public safety

- The Aladdin's Cave site is in close proximity to the adjoining railway line with low wire fencing the only barrier at points
- The site itself may represent health and safety concerns - e.g., floor is uneven,the site is used as storage for building materials/antiques/other miscellaneous items. This represents a serious fire hazard. They burn many of the materials themselves causing toxic fumes to blow into local gardens.
- Aladdin's Cave is situated on a bend in the road where Lewisham Way transitions into Loampit Hill heading towards Lewisham Town Centre. Currently the number of near misses and accidents we observe is of concern, but with the potential for illegal parking, illegal u-turns,dropping off and increased footfall the potential for an accident is genuine worry
-

The prevention of public nuisance

-
- The operating hours (10:00 - 00:00, 7 days per week) seem excessive for a licensed premise in a residential area, and would overlap with times when local children go to and from school, and the two nearby nurseries
-
- Noise as a particular issue - both in respect of music noise and crowd noise – is likely to be exacerbated by the proposed outdoor format and lack of acoustic barriers
-
- Noise during the day will affect the many residents currently working from home, and noise from late opening will cause sleep disturbance
-
- The potential for nuisance caused by smoke or cooking odours is high given the proposed outdoor food market format
-
- Rubbish removal and deliveries will cause further disturbance, presumably outside the proposed opening hours. The council licensing policy states that these activities should be prohibited between 2200-0800 but under the current application this would be difficult to adhere to assuming that the waste is unlikely to be removed during business hours
-
- Local residents will have to struggle with visitors blocking their driveways or taking their spaces with their cars (Loampit Hill, Sandrock Road, Tyrwhitt Road, St John's Vale, and Somerset Gardens are particularly vulnerable)
- Because of the increase in footfall of potential customers, there will inevitably
- be an increase in the number of vehicles parking and dropping off along the red route and bus lane directly outside the site
-
- There is no suitable location for loading relating to an alcohol licenced premises, nor for specific waste removal. Current measures in place for Aladdin's Cave are not suitable, see existing parking related nuisance which will only be made worse by further business being added
-
- The additional footfall and consumption of alcohol on the site is likely to cause
- increased littering in the local area (local residents already suffer from litter being added to their gardens on a daily basis - this is likely to spread)
- **The protection of children from harm**
- The site is in close proximity to two children's nurseries (Busy Bees Lewisham on Somerset Gardens, and Bright Horizons Brockley on Lewisham way), and nearby Ashmead Road Primary School. Children would be coming home from school/nursery past the site during proposed opening hours
-
- Children living locally may be impacted in their schoolwork or sleep patterns due to noise from the site
- Parts of the site overlook neighbouring houses, with visibility into adjoining gardens and properties where children play, and rear-facing childrens' bedrooms are visible

Objection 16

From: Chair - Brockley Society [<mailto:chair@brockleysociety.org.uk>]

Sent: 18 April 2021 14:52

To: Licensing

Dear Lewisham Licensing

Premises licence application for Aladdin's Cave, 72 Loampit Hill, SE13

Brockley Society wishes to **object** to the application for a Premises Licence at Aladdin's Cave, 72 Loampit Hill, SE13 7SX.

The notice affixed to the fence states the purposes of the application:

1. To enable the sale of alcohol between 10:00 and 00:00 hours daily for consumption on and off the premises.
2. To enable the sale of alcohol for extended hours at Bank Holidays and on other limited days as specified in the application.
3. To enable late night refreshment 23:00 to Midnight, 7 days a week.

Description of the site

The site is in the middle of a residential area on a busy main road. The pavement is narrow at its single entrance and adjacent to a bus stop. The pedestrian crossing is a short distance up the hill and people often risk crossing the main road from the site's entrance.

Houses and residential properties are immediately next to the site at 70 and 68 Loampit Hill, across the road at 51 to 63 Loampit Hill, and across the railway line in the former station master's cottage and a housing estate. The long site backs on to the houses in Somerset Gardens to the east. There are no buildings on the site apart from the former station's modest booking office.

St Johns to Lewisham Railsides (St Johns Station) is a Site of Borough Importance (Local Plan) and is located within an area identified as having a Local Open Space Deficiency. It is within a Green Corridor and is identified as a Site Importance for of Nature Conservation (SINC)

Brockley Society objects to the application on the following grounds:

The prevention of public nuisance

A night-time establishment serving alcohol and food stalls will cause a considerable nuisance to residents - from general chatter and hilarity alone. If there is music and entertainment this will be far worse. It appears that the everything will be outdoors. Residential properties are extremely close to the site and activities including taxis and private cars will create a considerable public nuisance. The site is totally unsuitable as a venue for food-stalls, alcohol and entertainment. It will cause considerable nuisance to the entirely residential surroundings. There is no local night-time economy nor any daytime audience for such a facility.

Public safety

The site has no natural footfall seeking entertainment or refreshments, which is more suitable to a town centre. Its customers will come from further afield, to a single entrance. Should queues be necessary outside, the space is limited and would create congestion on the pavement of a busy main road. There is little "spill-out" space for when the establishment closes. Almost no parking is available. There is no safe space for taxi drop-off and pick-up. All these aspects suggest that public safety will be compromised.

The protection of children from harm

The road is a route for children to and from several schools, to St John's Medical Centre and the nursery in its building, and to the Bright Lives Nursery at 289 Lewisham Way. School children and students use the bus stop outside the premises. Lewisham College students, many under age, pass the site all the time. Sale of alcohol in an open air site from 10am could be harmful to children, as could the noise disturbance from the premises during the day.

The prevention of crime and disorder

This is not a suitable place for an eating and drinking establishment and could lead to disorder and possible use of drugs.

Please take these points into considering in making your decision.

Kind regards

Objection 17

Sent: 18 April 2021 18:09

To: Licensing

Cc: chair@st-johns-soc.org

Subject: Aladdin's Cave Alcohol License Application

To Whomever It May Concern,

I am writing to raise some objections to the Aladdin's Cave alcohol license application. My objections mainly relate to the prevention of crime and disorder, the prevention of public nuisance, public safety, and the protection of children from harm.

Prevention of crime and disorder

Aladdin's cave is understood to currently have planning use class B8 (storage and distribution). I believe that operating as a bar would not be a legal use of the site without planning approval for change of use.

Public safety

Aladdin's Cave is in close proximity to an adjoining railway line, with low wire fencing the only barrier at this point. The site itself may represent health and safety concerns (e.g., the floor is uneven; the site is used as storage for building materials, antiques, and other miscellaneous items).

The Prevention of Public Nuisance

The operating hours (10:00 - 00:00, 7 days per week) seem excessive for a licensed premise in a residential area, and would overlap with times when local children go to and from school. Late night opening represents a potential noise problem for neighbours in Loampit Hill (adjacent), Somerset Gardens (which adjoins the rear of the site), and Whidborne Close/Cliff Terrace (across the railway).

Noise as a particular issue - both in respect of music noise and crowd noise - is likely to be exacerbated by the proposed outdoor format. The local pub in Tyrwhitt Road (The Talbot) has a history of noise concerns from local neighbours and imposes constraints on use of their outdoor space after certain hours to mitigate these concerns. The potential for nuisance caused by smoke or cooking odours is high given the proposed outdoor food market format.

The Protection of Children From Harm

The site is in close proximity to two childrens nurseries (Busy Bees Lewisham on Somerset Gardens, and Bright Horizons Brockley on Lewisham way), and nearby Ashmead Road Primary School. Children would be coming home from school/nursery past the site during the proposed opening hours. Children living

locally may be impacted in their school work or sleep patterns due to noise from the site.

If customers do not remain in the proposed area of use of the site, and/or are allowed to use the rest of the property, they could overlook neighbouring houses from other parts of the site, with visibility into adjoining gardens where children play, and rear-facing childrens' bedrooms.

I implore you to take my objections and my neighbour's objections on board.

Yours sincerely,

Objection 18

Sent: 17 April 2021 09:33

To: Licensing

Subject: Objection to licence for liquor at 72 Loampit Hill

We at (address removed) object to the liquor licence at aforementioned address. Its not accessible to cars, theres already an alcohol addiction issue locally. The noise from such long hours of opening would mean that local residents would never have a break from the light polution and noise. Theres no available parking in tyrwhitt road - now there are fights without the additional pressure on the immediate locality. The additional strain of this being a bar for elongated hours is unbearable on an already overloaded area.

Please imagine, youve spent your lifes savings and chose to live somewhere and then yr property is immediatly devalued and your home working lifestyle removed. Your right to peaceful enjoyment removed.

Objection 19

Sent: 19 April 2021 21:29

To: Licensing

Cc: chair@st-johns-soc.org

Subject: Aladdin's Cave, 72 Loampit Hill - License application - Written Representation

To the Licensing Authority

We are extremely concerned about the application for a Premises licence for Aladdin's Cave, and their proposal to change the antiques and salvage shop to a drinks venue with hours extending beyond their current shop hours to 10:00 am – 00:00, 7 days per week.

Aladdin's Cave has several close residential neighbours. Our Communal garden for our block of flats at (address removed) shares a boundary fence with Aladdin's Cave, and as a result I am raising this representation to the council to oppose granting this license, in either its current or reduced form, for the reasons outlined below.

If you have any queries regarding the points raised below, please do not hesitate to contact me.

The prevention of crime and disorder:

- There is Concern about people congregating outside or queuing to gain access at the front of Aladdin's Cave and the properties on Loampit Hill. There is a bus stop at the entrance to Aladdin's Cave where the general public (including children) regularly wait.
- We have already encountered customers / friends of Aladdin's cave urinating in our front garden whilst the shop has been closed during the public lockdown. We only foresee this problem getting worse if an alcohol license is granted.

Public safety:

- Aladdin's Cave is in close proximity to the adjoining railway line with low wire fencing the only barrier at points, customers under the influence of alcohol may put themselves in danger when exiting the premises.
- The site itself in its current state represents health and safety concerns - e.g., floor is uneven, site is used as storage for building materials.
- Aladdin's Cave is situated on a bend in the road where Lewisham Way transitions into Loampit Hill heading towards Lewisham Town Centre. Crossing the road can already be dangerous when there are more than the designated vehicles parked in the road for Aladdins cave (which there regularly are), we can only see this getting worse with higher traffic volumes e.g. taxis picking up customers.
- The Likelihood of increased number of U-turns on Loampit Hill by taxis dropping off and picking up customers is increased with high potential for accidents, the bend in

the road as mentioned above causing reduced vision for vehicles travelling south towards Lewisham already.

The prevention of public nuisance:

- The operating hours (10:00 - 00:00, 7 days per week) seem excessive for a licensed premise in a highly residential area, and would overlap with times when local children go to and from school
- Late night opening represents a potential noise problem for neighbours in both Loampit Hill (adjacent), Somerset Gardens (which adjoins the rear of the site) and Whidborne Close/Cliff Terrace (across the railway)
- All surrounding properties are currently utilised only for residential purposes and therefore noise, light and food odours will be detrimental to the quality of life, in particular sleep disturbance.
- Noise from both music and the crowd in the bar, is likely to cause particular disturbance given the current lack of sound barrier between Aladdin's Cave and the neighbouring properties. We have already experienced disturbed sleep as a result of the current owners playing music loudly.
- The potential for nuisance caused by smoke or cooking odours is high given the proposed outdoor food market format, as above, given the lack of barriers between Aladdin's Cave and the neighbouring properties any smoke would go directly into residential gardens.
- Rubbish removal and deliveries will cause further disturbance, presumably outside the proposed opening hours, likely in the early hours of the morning.
- Because of the increase in footfall of potential customers, there will inevitably be an increase in the number of vehicles parking and dropping off along the red route and bus lane directly outside the residences of Loampit Hill and Aladdin's Cave.
- A number of Loampit Hill properties have off street parking, we know from experience that visitors to Aladdin's Cave regularly park on this private land without permission. We assume that this will increase with the proposed change of use.

The protection of children from harm:

- The Site is in close proximity to two children's nurseries (Busy Bees Lewisham on Somerset Gardens, and Bright Horizons Brockley on Lewisham way), and nearby Ashmead Road Primary School. Children would be coming home from school/nursery past the site during proposed opening hours.
- Children living locally may be impacted in their schoolwork or sleep patterns due to noise from the site
- If customers did not remain in the proposed area of use of the site, and/or are allowed to use the rest of the property, they could from other parts of the site overlook neighbouring houses, with visibility into adjoining gardens and properties where children play, and rear-facing childrens' bedrooms.

We don't believe that the sale of alcohol for any length of time on these premises is conducive to a safe and nuisance free residential area.

Objection 20

Sent: 15 April 2021 20:38

To: Licensing

Cc: chair@st-johns-soc.org

Subject: Aladdin's Cave, 72 Loampit Hill - License Application

Written Representation – Sent 15/04/2021

To the Licensing Authority,

I am writing to inform you that I am deeply concerned about the application for a Premises licence for 72 Loampit Hill, SE13 7SX (currently home to Aladdin's Cave), and their proposal to set up an outdoor drinks venue selling alcohol between 10:00 am – midnight, 7 days per week, with additional hours on bank holidays and other special occasions.

I oppose, in its totality, the application for a Premises licence for 72 Loampit Hill, SE13 7SX.

The site is in a quiet neighbourhood with many residential properties close by. Many of the residential neighbours share a boundary fence with the site with no barriers to sound, light or air pollution.

Although the licence has been applied for by persons separate to those who run Aladdin's Cave there are already have significant issues with noise, litter and anti-social behaviour and trespassing due to the existing business at the site, and these will be made significantly worse if a licence to sell alcohol is granted. In addition, the site itself is inherently unsuitable for the proposed use, and I have no confidence that either the named applicants or the employees of Aladdin's Cave will encourage staff or customers of the proposed business to obey the conditions of the licence.

Furthermore, our previous experience suggests that they are not responsible enough to fulfil the conditions of an alcohol licence with appropriate care for their customers or the surrounding neighbourhood.

The points below summarise my main concerns:

The prevention of crime and disorder

- People congregating outside, queuing to gain access, or exiting the Aladdin's Cave site late at night may contribute to crime and disorder and cause local residents to feel intimidated
- Crowds of people, especially males who have been drinking alcohol, are incredibly unpleasant to have to walk through as a young woman due to worries about sexual harassment or assault (especially a concern given

recent events). Local residents would have to pass through these crowds in order to get to St Johns train station which is the closest access to public transport, including if they were returning home late for example from an evening shift at work. There are already issues with local female residents being sexually harassed (cat-called) by people hanging around the entrance to Aladdin's Cave, and this would become much more of an issue if the proposed licence was granted

- Aladdin's cave already utilizes the pavement outside their store as an illegal extension of the shop, often extending down past number 70 Loampit Hill and allowing passage through in single file only, with dangerous piles from the yard from either side. This situation will be much more congested with people congregating outside the front as mentioned above. Please note there is a bus stop at the entrance to Aladdin's Cave where the general public (including children) regularly wait, this will only increase the local disorder and make the pavements inaccessible for pedestrians

- The Aladdin's Cave site is understood to currently have planning use class B8 (storage and distribution). They have not yet applied for any change in use so currently setting up the proposed bar would be illegal. They are already going ahead with physical alterations to their site in preparation regardless of this

- Projectiles – local residents have reported problems with projectiles (golf balls and food containers) being thrown over the fence and into their gardens by people in Aladdin's Cave. Not only is this littering, but dangerous as they could have been struck. Their objections were met with indifference and no apology was offered

- Public urination - this is already a problem as people have been observed coming from Aladdin's Cave out onto the street, using the front gardens of the houses on the street to urinate in, and then returning to the business

- Litter - local gardens are full of empty crisp packets, cigarette packets and beer cans in the area that shares a boundary with the Aladdin's Cave site. This littering would likely increase if a licence to sell alcohol was granted as there would be more litter produced and people would be disinhibited from drinking alcohol

- Fire Damage - A fire coming from the Aladdin's Cave site has caused damage to a tree (10m+ height) at the back of our garden, causing extensive damage to the tree and its surroundings and the tree is now dead.

- Customers and business associates of the current business regularly park on or blocking local properties when expressly told not to (trespass & intimidation). If the licence was granted there would be many more vehicles attempting to access the site and this problem would become much worse. In addition, staff from Aladdin's Cave have been witnessed to cycle around

- The right to respect for private and family life is protected by the Human Rights Act 1998. As the site borders on the gardens and bedrooms of local residents customers using the site would be able to see into these and infringe on the right to privacy of local residents

- Bats (a protected animal) have been sighted in the area and the lights, noise and food odours will adversely affect them and their habit. It has been reported in Aladdin's Cave's previous planning application (RT-MME-126620-02 to build new flats on the site) that a bat corridor may exist here and requires further monitoring

Public safety

- The Aladdin's Cave site is in close proximity to the adjoining railway line with low wire fencing the only barrier at points – customers who have been consuming alcohol may accidentally or intentionally breach this barrier and end up on the railway line

- The site itself may represent health and safety concerns - e.g., floor is uneven, the site is used as storage for building materials/antiques/other miscellaneous items. This represents a serious fire hazard

- Aladdin's Cave have been making large bonfires of excess stock, including painted, varnished or otherwise treated materials. This creates clouds of toxic smoke which affect pedestrians walking on the road and also blows into nearby gardens and houses, posing a health risk to local residents. Staff at Aladdin's Cave have indicated that the reason they are burning the excess stock is to clear the site for the proposed bar, so if the licence is granted this burning of hazardous material is likely to persist or increase (Please see attachments 18 - 19)

- The Aladdin's Cave site is situated on a bend in the road where Lewisham Way transitions into Loampit Hill heading towards Lewisham Town Centre. Currently the number of near misses and accidents we observe is of concern, but with the potential for illegal parking, dropping off and increased footfall the potential for an accident is genuine worry

- Aladdin's' Cave have shown a reckless disregard for public health and safety by remaining open during the Coronavirus pandemic when all non-essential retail was instructed to close

- We have felt the need to invest in security equipment specifically because of the behaviour of Aladdin's Cave and its members. We already do not feel safe while they are operating and this will likely only become worse if they are granted a licence to sell alcohol in any format

- As mentioned above there is a large dead tree which was damaged by a fire from Aladdin's Cave. This may be a hazard to ourselves or to customers and staff at the proposed bar if it falls over or branches drop

Public safety concerns due to impact on my work as a doctor

- In addition to my general concerns about the impact of this proposal on public safety I am also concerned about the impact it may have on my ability to do my job as an NHS doctor
- I regularly work night shifts. In order to do this safely it is essential that I am able to sleep during the day. The proposal to set up an outdoor drinking establishment with music and no sound protection would seriously impact my ability to rest between night shifts, which would adversely affect my ability to provide the best care for my patients
- If our driveway were to be blocked by people attending the site it would be big concern for me as I need to be able to get out of my driveway when I am on call. This problem is likely to get much worse if the proposed licence is granted
- Furthermore as part of my workis currently delivered virtually due to the Covid-19 pandemic. Having the constant sound of music and chatter from a drinking establishment in the background would be very detrimental to the process of therapy, adversely affecting the treatment of people with significant mental health problems, many of whom have been waiting a long time to receive these treatments

The prevention of public nuisance

- The operating hours (10:00 - 00:00, 7 days per week) seem excessive for a licensed premise in a residential area, and would overlap with times when local children go to and from school, and the two nearby nurseries
- Late night opening represents a probably noise problem for neighbours in Loampit Hill (adjacent), Somerset Gardens (which adjoins the rear of the site) and Whidborne Close/Cliff Terrace (across the railway)
- This is surrounded by purely residential premises and therefore noise, light and food odours will be detrimental to the quality of life, especially sleep disturbance
- Noise as a particular issue - both in respect of music noise and crowd noise - is likely to be exacerbated by the proposed outdoor format and lack of acoustic barriers. Noise from the Aladdin's Cave site, for instance the sound of glassware being cleared, is already clearly audible in the surrounding residential properties and gardens (Please see attachment 20). As the proposal is for an outdoor drinking establishment there is no way for the applicants to mitigate or reduce this noise pollution
- Due to the Coronavirus pandemic many of the residents in the properties affected by sound pollution from the Aladdin's Cave Site are working from home (will continue to do so even after pandemic restrictions are lifted) and

will be greatly disrupted by the additional noise during working hours from customers and music - this could affect people's livelihoods

- Music: music is sporadically played at Aladdin's Cave, which does not seem to be allowed under their current commercial use licence. One instance on 15th March 2021 occurred at 7.30am and woke up local residents in multiple properties, including our own. A professional sound system would be even more intrusive
- Rubbish removal and deliveries will cause further disturbance, presumably outside the proposed opening hours. The council licensing policy states that these activities should be prohibited between 2200-0800 but under the current application this would be difficult to adhere to assuming that the waste is unlikely to be removed during business hours
- The potential for nuisance caused by smoke or cooking odours is high given the proposed outdoor food market format
- Because of the increase in footfall of potential customers, there will inevitably be an increase in the number of vehicles parking and dropping off along the red route and bus lane directly outside the residences of Loampit Hill and Aladdin's Cave. As a number to these Loampit Hill properties have off street parking, we know from experience that visitors to Aladdin's Cave regularly park on this private land without permission. Therefore we can assume that this will increase with the proposed change of use. During lockdown there were a number of illegal gatherings at Aladdin' Cave and cars were parked on the Red Route down Loampit Hill towards Lewisham Town Centre. The parked cars also blocking the driveway exits on Loampit Hill (as shown in attachments 5 – 15)
- The potential for U-turns on Loampit Hill by taxis and drop-offs and pick-ups is increased with potential for accidents
- Somerset Gardens is a very quiet residential road with parking restrictions, but due to it's an oval shape it could use it as a turning point therefore increasing traffic along this narrow road, disturbing local residents
- Local residents will have to struggle with visitors blocking their driveways or taking their spaces with their cars (Sandrock Road, Tyrwhitt Road, and Somerset Garden are particularly vulnerable)
- There is no suitable location for loading relating to an alcohol licenced premises, nor for specific waste removal. Current measures in place for Aladdin's Cave are not suitable, see existing parking related nuisance which will only be made worse by further business being added
- Intoxicated behaviour - we have witnessed people in the Aladdin's Cave site who were clearly intoxicated on either alcohol or other substances. The staff at Aladdin's Cave either do not notice or do not feel that they needed to

intervene to check if these people are in need of medical assistance, or otherwise escorted them off the premises

- There are already issues with people (often in the context of alcohol consumption) urinating on the front gardens of the properties in Loampit Hill adjacent to the Aladdin's Cave site. This is likely to increase massively if a licence to sell alcohol at the site is granted

The protection of children from harm.

- The Aladdin's Cave site is in close proximity to two children's nurseries (Busy Bees Lewisham on Somerset Gardens, and Bright Horizons Brockley on Lewisham way), and nearby Ashmead Road Primary School. Children would be coming home from school/nursery past the site during proposed opening hours.
- Children living locally may be impacted in their schoolwork or sleep patterns due to noise from the site - especially as it is possible there will be another wave of Coronavirus and if schools close again children will have to do their schoolwork at home
- If customers did not remain in the proposed area of use of the site, and/or are allowed to use the rest of the property, they could from other parts of the site overlook neighbouring houses, with visibility into adjoining gardens and properties where children play, and rear-facing children's bedrooms
- My partner and I are hoping to soon start a family and if this proposal were to go ahead it would create an unsavoury, unsuitable, and potentially unsafe environment in which to raise young children

Objection 21

Sent: 18 April 2021 17:08

To: Licensing

Subject: Aladdins Cave Alcohol Licence Application

To whom ever it may concern,

I would like to raise a representation against Aladdin's Cave (72 Loampit Hill) application for an alcohol Licence.

There are a number of concerns regarding this application. They are as follows:

1. The impact of noise on local residents. We already experience an increase of noise from the Talbot Pub. Customers leaving the venue have no respect for the fact it is a residential area and my children are often woken by noise in the street as customers make their way home. This would increase greatly if Aladdins cave is granted an alcohol licence. The outdoor format will mean a larger local area will be affected by the noise both during the day and at night. Many residents work from home, nearby local nurseries also have very young children that need to sleep during the day.
2. People congregating outside, queuing to gain entry or exiting Aladdins Cave late at night may contribute to crime and disorder and cause local residents to feel intimidated.
3. Aladdin's cave already utilizes the pavement outside their store as an illegal extension of the shop, they often block the road with vehicles. This will become worse with alcohol and food deliveries and waste removal should they be granted a licence.
4. Aladdins' Cave have remained open during the Coronavirus pandemic when all non-essential retail was instructed to close
5. The operating hours (10:00 - 00:00, 7 days per week) seem excessive for a licensed premise in a residential area, and would overlap with times when local children go to and from school, and the two nearby nurseries.
6. The potential for nuisance caused by smoke or cooking odours is high given the proposed outdoor food market format
7. Local residents will have to struggle with visitors blocking their driveways or taking their spaces with their cars (Loampit Hill, Sandrock Road, Tyrwhitt Road, St John's Vale, and Somerset Gardens are particularly vulnerable) It is already extremely difficult for residents to park on Tyrwhitt Road. We already experience the impact of people parking for the Talbot Pub, Doctors surgery on Loampit Hill, local nurseries,

St John Train Station, Hilly Fields Park and even other local residents who do not want to pay the CPZ charge to park on their own roads or visitors of residents who live in a CPZ.

8. Because of the increase in footfall of potential customers, there will inevitably be an increase in the number of vehicles parking and dropping off along the red route and bus lane directly outside the site. This road is already very dangerous with many near misses. Given the fact that many children walk to and from school past the sight it is a cause for concern.

9 Parts of the site overlook neighbouring houses, with visibility into adjoining gardens and properties where children play, and rear-facing childrens' bedrooms are visible

Objection 22

Aladdin's Cave, 72 Loampit Hill - License application

Written Representation – Sent Wednesday 14 April 2021

To the Licensing Authority,

I am greatly concerned about the application for a Premises Licence for Aladdin's Cave and the proposal to change the antiques and salvage shop to a food/drinks venue with hours extending from 10:00–00:00 7 days a week (when they currently close at 17:00).

Aladdin's Cave has several close residential neighbours, many of which share boundary fencing, my garden included. My home and garden directly overlook the Aladdin's Cave yard, and my neighbours and I have no confidence that we will be in any way protected from the increased noise, light and smell pollution, and potential anti-social behaviour that would likely occur.

Objection 24

Sent: 20 April 2021 07:35

To: Licensing

Subject: Representation against alcohol licensing application - Aladdin's Cave

Dear Sir/ Madam,

We have been made aware of the proposal to turn the Aladdin's Cave site into an on and off licence bar, open every day, 7 days per week and wish to voice our grave concerns.

We find this surprising and very worrying that such use is being considered in this residential area, and in particular would draw your attention to the following implications, consequences and concerns:

The prevention of crime and disorder

- ? People will be congregating outside, queuing to gain access, or exiting Aladdin's Cave late at night. We already have some isolated incidents of this where people deviate from the main road down the residential side streets, such as ours on Sandrock Road, and are loud, rude and intimidating to our diverse community on the street, including many young families and elderly residents. We have grave concerns that such a venue, serving alcohol on and off the premises every day during the week until late at night will increase this feeling of intimidation and increase the number of instances of crime and disorder, including shouting, causing disturbances, urinating in or at the front of our property and damage to property. Of particular concern is that there is no street lighting in the first section of Sandrock Road, which would encourage inebriated groups to congregate in the street causing disturbance, increasing the likelihood of crime and disorder

- ? Public urination - People who have been consuming alcohol at the proposed site are likely to utilise the surrounding streets or front gardens of nearby properties to relieve themselves (we have already witnessed this occurring on Sandrock Road on several occasions). Again, the lack of street lighting at the top of Sandrock Road, close to Loampit Vale makes it an easy target for people who think they can 'hide' in the side street, to urinate, or to congregate to create disorder. We have had experience of a number of fights breaking out on the street both before and during the pandemic, so a large on and off licence bar across the road is undoubtedly going to increase the number of incidents

- ? Bats (protected) have been sighted in the area and the lights, noise and food odours will adversely affect them and their habit. It has been reported in Aladdin's Cave's previous planning application (RT-MME-126620-02 to build new flats on the site) that a bat corridor may exist here and requires further monitoring

Public safety

- ? The footpath to the side of the main road, and close to the well utilised bus stop (used by the elderly and children to access places such as the local Ashmead School, Nursery and medical centre a little further down the road), is very narrow for a busy main road such as Loampit Vale/Lewisham Way (since the current owners already utilise the pavement to set out some of their goods) - allowing passage through in single file only. This situation will be much more congested with people congregating outside the front as mentioned above, and would raise concerns of safety for the general public.

- ? Aladdin's Cave is situated on a bend in the road where Lewisham Way transitions into Loampit Hill heading towards Lewisham Town Centre. Currently the number of near misses and accidents we observe is of concern, but with the potential for illegal parking, illegal u-turns, dropping off and increased footfall the potential for an accident is genuine worry. This risk is significantly heightened given that, as mentioned above, the site is located close to a key bus stop for schools, nurseries and medical centre.

The prevention of public nuisance

- ? The operating hours (10:00 - 00:00, 7 days per week) is excessive for a licensed premise in a residential area such as this, and would overlap with times when local children go to and from school, and the two nearby nurseries.
- ? Noise, public nuisance and disturbance of quiet enjoyment would be a particular issue - both in respect of music noise and crowd noise, given not only the operating times proposed but also the proposed capacity in a relatively small space. The noise and disturbance impact will undoubtedly be exacerbated by the proposed outdoor format and total lack of acoustic barriers.
- ? Noise during the day will affect the many residents currently working from home, and noise from late opening will cause sleep disturbance for the hundreds of residents in the immediate vicinity and nearby streets.
- ? The potential for nuisance caused by smoke or cooking odours is high given the proposed outdoor food market format - there will be many many people leaving the site with food, tossing their rubbish into our street, which will create a fox and rodent issue far worse than we currently experience.
- ? Rubbish removal and deliveries will cause further disturbance, presumably outside the proposed opening hours. The council licensing policy states that these activities should be prohibited between 2200-0800 but under the current application this would be difficult to adhere to assuming that the waste is unlikely to be removed during business hours
- ? Local residents will have to struggle with visitors blocking their driveways or taking their spaces with their cars (Loampit Hill, Sandrock Road, Tyrwhitt Road, St John's Vale, and Somerset Gardens are particularly vulnerable) - it is already difficult enough to find parking spaces in our street, Sandrock Road, even with the current resident parking restrictions - a venue such as this would exacerbate this significantly.

- ? Because of the increase in footfall of potential customers, there will inevitably be an increase in the number of vehicles parking and dropping off along the red route and bus lane directly outside the site, causing disruption to an already very busy stretch of the main A20 road.
- ? It doesn't appear to currently have any suitable location for loading relating to an alcohol licenced premises, nor for specific waste removal. Current measures in place for Aladdin's Cave are not suitable - there are already issues with vans and cars parking up on the red route to load and unload. This proposed change of use will only make this situation worse, on a busy and dangerous brow of the hill of the main road.
- ? The additional footfall and consumption of alcohol on (and, as proposed, off) the site is likely to cause increased littering in the local area. As a local resident, we already suffer from litter being added to our garden, our bin, and left outside our house on a daily basis - this is likely to spread. This is only going to get worse with a large commercial premises being across the road selling food and alcohol, 7 days a week, all day and most of the night.

. The protection of children from harm

- ? The site is in close proximity to two children's nurseries (Busy Bees Lewisham on Somerset Gardens, and Bright Horizons Brockley on Lewisham way), and nearby Ashmead Primary School which our own children attend. Children would be coming home from school/nursery past the site during proposed opening hours and using the bus stop close by. Having experienced this in the past in other locations, an all day bar such as this is likely to increase the risk of intimidation (and worse, potential harm) of children by inebriated (or worse) customers of the proposed bar/food venue, trying to get home from school. I am very concerned that my young teenage daughter will not feel safe catching the bus back to that bus stop after school for fear of being 'caught up' in a difficult situation with drunk customers in such an establishment.
- ? There are many families with children living locally (including ourselves on Sandrock Road) and we are very concerned that our children will be impacted in their schoolwork and/or sleep patterns due to noise from the site.
- ? I understand from a local friend and neighbour that parts of the site overlook houses, with visibility into adjoining gardens and properties where children play, and rear-facing childrens' bedrooms are visible. This is clearly a significant concern.

Objection 25

Sent: 18 April 2021 10:20

To: Mullin-Murrell, Angela

Cc: Licensing

Subject: Re: RE: Aladdins cave licensing request

Regarding my objection for the licence please see my points of concern below regarding the application -

The operating hours (10:00 - 00:00, 7 days per week) is excessive for a licensed premise in a residential area.

Prevention of public nuisance -

Noise as a particular issue - both in respect of music noise and crowd noise - is likely to be exacerbated by the proposed outdoor format and lack of acoustic barriers

People congregating outside, queuing to gain access, or exiting Aladdin's Cave late at night may contribute to crime and disorder and cause local residents to feel intimidated.

Public Safety -

Aladdin's cave already utilizes the pavement outside their store as an illegal extension of the shop, often extending down past number 70 Loampit Hill and allowing passage through in single file only, with dangerous piles from the yard from either side. This situation will be much more congested with people congregating outside the front as mentioned above. Please note there is a bus stop at the entrance to Aladdin's Cave where the general public (including children) regularly wait, this will only increase the local disorder and make the pavements inaccessible for pedestrians

Aladdin's Cave is situated on a bend in the road where Lewisham Way transitions into Loampit Hill heading towards Lewisham Town Centre. Currently the number of near misses and accidents I observe is of concern, but with the potential for illegal parking, illegal u-turns, dropping off and increased footfall the potential for an accident is genuine worry. Also there is already an increased amount of traffic along this road due to various reasons such as the building of the new buildings on Lewisham roundabout, road closures in the surrounding are etc, meaning that people are already using the surrounding areas as shortcuts and making the area more polluted and bad for the environment.

The additional footfall and consumption of alcohol on the site is likely to cause increased littering in the local area (local residents already suffer from litter being added to their gardens on a daily basis - this is likely to spread)

Objection 26

Written Representation – Sent Thursday, 15th April 2021

To the Licensing Authority,

I am writing this representation to oppose, in its totality, the application for a Premises licence for 72 Loampit Hill, SE13 7SX, in the conservation area of St John's.

The Aladdin's Cave plot is unsuitable for an alcohol licence. Current use of the plot already causes nuisance to local residents, as well as causing public safety hazards, criminal behaviour, and danger to children. These issues will only be made worse if a licence to sell alcohol, in any form, for any length of time, were to be granted. This is laid out under the four licensing objectives below.

Aladdin's Cave is in a residential neighbourhood. Their ambition is to host an outdoor food and drinks venue which is not dissimilar to Lewisham Street Eats or Mercato Metropolitan. These businesses are successful, but crucially they are surrounded by other businesses - they are not surrounded by residential buildings void of any protection. They are also managed very strictly.

Aladdin's Cave is surrounded on all sides by gardens and residential housing. Loampit Hill, Somerset Gardens, Whidborne Close, and Cliff Terrace all surround the plot and are all residential.

Homeowners in this area also tend to have poor levels of sound insulation due to conservation rules preventing the installation of modern style windows. This is particularly true for us. The negative impacts from the granting of such a licence would affect many residents.

Noise levels from Aladdin's Cave are already quite loud on a given day, emanating into the surrounding gardens. Many gardens surround the plot, with some sharing a boundary with little protection, only a flimsy mesh fence. Some windows of local residents are only a few meters away from the proposed area of operation for the bar.

We have no confidence that we will be protected in any way from the increase in noise, light and smell pollution, or increase in criminal behaviour that is likely to result if this licence were to be granted.

Photographic evidence is available for many of the issues cited above and below but has been redacted to secure the protection of anonymity.

Many of my points reference existing issues and examples. While I appreciate that the licence is being applied for by persons separate to those who run Aladdin's Cave. The issues raised will only become worse if alcohol were allowed to be distributed on the site by any persons and I have no

confidence that any members of Aladdin's Cave would assist the relevant persons in adhering to the rules of a licence. These businesses will be inextricably linked - they will be run in tandem on the same plot of land which will only exacerbate many of the issues listed.

Many of the issues relate to the plot itself and would be prevalent regardless of which persons were in charge of the distribution of alcohol.

Due to all reasons listed above and below we also believe that the police activity will increase in the area, creating an unnecessary drain on essential, lifesaving, resources.

With consideration for all the above, I oppose the granting of this licence, in any form (full or reduced), for the following reasons:

The Prevention of Crime and Disorder

- Illegal use - Aladdin's cave is understood to currently have planning use class B8 (storage and distribution) and so I believe that operating as a bar would not be a legal use of the site without planning approval for change of use. They are already going ahead with physical alterations to their site in preparation regardless of this.
- Loitering and intimidation - I am concerned about people congregating outside or queuing to gain access at the front of Aladdin's Cave and the properties on Loampit Hill. They are already an intimidating presence: people cross the street to avoid them, local female residents have mentioned being cat called (sexual harassment) from persons within Aladdin's Cave. These issues would only get worse were a licence to be granted.
- Further illegal use - Aladdin's cave already utilizes the pavement outside their store as an illegal extension of the shop, often extending down past number 70 Loampit Hill and allowing passage through in single file only, with dangerous piles from the yard from either side. This situation will be much more congested with people congregating outside the front as mentioned above.
- Projectiles - we have witnessed projectiles (golf balls and general waste) being thrown over the fence and into neighbouring gardens by people in Aladdin's Cave - this happened during a private party they held during lockdown after their usual hours of operation. Not only is this littering coming from the site, but dangerous people could be struck. We fear this will only escalate with the proposed change of use on part of the site.
- Invasion of privacy - I believe this will negatively affect my right to privacy and family life. We have witnessed people leaning over the fence to look into neighbouring gardens from 72 Loampit Hill, and saw people shouting over the fence at residents trying to enjoy their own garden. This would only get much worse with the presence of alcohol and greater numbers of visitors to the site.
- Public urination - this is already a problem as people have been observed coming from Aladdin's Cave out onto the street, using front gardens to urinate in, and then returning to the business.
- Litter - Neighbouring gardens with 72 Loampit Hill are regularly filled with food containers and general litter along the shared border. We are aware this needs to be collected regularly by the neighbouring residents.

- Fire Damage/Risk - As can be seen at the right rear of the 72 Loampit Hill site, a fire has been previously set against the unprotected boundary of a neighbouring plot which has caused extensive damage to a protected tree. This has created an ongoing hazard that looms over multiple plots - a concern for public safety. Pictures attached. This raises concerns on general fire safety too, with hordes of flammable material stored on the 72 Loampit Hill plot. The plot also only has one entrance/exit which would be shared by both Aladdin's Cave and the alcohol distributors.
- Trespass & Intimidation - I regularly witness suppliers and customers of 72 Loampit Hill not only blocking local driveways but also driving into them to park and load. This causes a great deal of distress for the residents and would only get worse if further business were to be added to the plot, putting more strain on already unsuitable loading facilities on the single access plot. This is also a red route.

Public safety

- Unsafe conditions / fire hazards - The site itself may represent health and safety concerns - e.g. floor is uneven, the site is used as storage for building materials/antiques/other miscellaneous items. This represents a serious fire hazard. They burn many of the materials themselves, to clear space, causing toxic fumes to blow into local gardens.
- Traffic safety - Aladdin's Cave is situated on a bend in the road where Lewisham Way transitions into Loampit Hill heading towards Lewisham Town Centre. Currently the number of near misses and accidents we observe is of concern, but with the potential for illegal parking, dropping off and increased footfall the potential for an accident is a growing worry.
- Traffic safety - Blocking the line of sight for driveways makes use of driveways more dangerous by parking large vans at the mouth of residents' driveways. I regularly witness that due to parking violations by 72 Loampit Hill associates it is impossible for neighbours to pull out safely without a second person walking onto the road to halt oncoming obscured traffic. Pedestrians regularly have to walk onto the main road to skirt round the vans blocking the pavement.
- Amenities - The toilet facilities may be inadequate for the change of use (only 1 seems to exist currently and is in poor condition). Even in the past few months, while the business remained open illegally, we have witnessed members of Aladdin's Cave use our local gardens to urinate (this is also a crime and disorder and nuisance problem).
- Coronavirus rules breaches - Aladdins' Cave have shown a reckless disregard for public health and safety by remaining open during the Coronavirus pandemic when all non-essential retail was instructed to close. If they don't care about a pandemic then by extension, they do not care about the effects of their behaviours on local residents.
- Home security - Local residents have expressed they felt the need to invest in security equipment specifically because of the behavior of Aladdin's Cave and its members. This feeling would only increase were the plot to be filled with drinking revellers. We already do not feel safe while they are operating and this will only become worse if they are granted a licence to sell alcohol in any format.

- Fall hazard - As mentioned above there is a large dead tree which was damaged by a fire from Aladdin's Cave which may be a hazard if it falls over or branches drop.
- Railway danger - Aladdin's Cave is in close proximity to the adjoining railway line with low wire fencing the only barrier.

The prevention of public nuisance

- Extended hours - The operating hours (10:00 - 00:00, 7 days per week) seem excessive for a licensed premise in a residential area, and would overlap with times when local children go to and from school, and the two nearby nurseries. Lewisham Council policy on this matter suggests that even a suitable outdoor site in a residential area should not be open beyond 9pm.
- The licence represents a likely noise problem for a large number of residential neighbours in Loampit Hill (adjacent), Somerset Gardens (which adjoins the rear of the site) and Whidborne Close & Cliff Terrace (across the railway). This would negatively impact residents at all times of day.
- Noise at any time: During the day: people who work from home will be negatively impacted (this includes myself, and I will continue to work from home beyond the pandemic). Also those who work shift patterns and need to sleep during the day will suffer greatly (a local resident who is a Doctor). This could also affect people's livelihoods if their ability to work from home is affected.

In the evening: this will affect all residents negatively.

- Outdoor Noise - both in respect of music noise and crowd noise - is likely to be exacerbated by the proposed outdoor format and lack of acoustic barriers. Noise levels are already disruptive, with material regularly being smashed down to be burned, and chatter from customers at the existing Aladdin's Cave business is already audible in many of the surrounding properties.
- Noise continued - Aladdin's Cave will be unable to take any of the mitigating actions to dampen noise nuisance as detailed in the Lewisham Statement of Licencing Policy document due to the open air nature of the plot.
- Noise distribution: Residents of Loampit Hill, Somerset Gardens, and Whidborne Close all have line of sight to the plot (both from their gardens and properties) and will suffer from the noise at all times of day.
- The local pub in Tyrwhitt Road (The Talbot) has a history of noise concerns from local neighbours and is on a neighbouring plot which I believe would create a cumulative noise nuisance effect if the licence were to be granted at 72 Loampit Hill.
- Light and smell nuisances - as the plot is surrounded by purely residential premises, the common barrier between our plots is a mesh fence, offering no protection. Therefore, in addition to noise; light and food odours will be detrimental to the quality of life, especially sleep disturbance. The potential for nuisance caused by smoke or cooking odours is high given the proposed outdoor food market format. The smoke that permeates from the site already, engulfing local properties and gardens, illustrates that the same problem would exist with the proposed market related food smells and fumes).

- Access - There is a bus stop on one side of the entrance to Aladdin's Cave and residential driveways on the other side. Any queues in relation to admission of Aladdin's cave would cause blockages either for people waiting for a bus or for access to neighbouring properties (many bedrooms also face the opening of 72 Loampit Hill so any congregations would quickly amount to nuisance).
- Rubbish removal (especially bottles and cans) is likely to add to the noise nuisance, likely at unsociable hours. The council licensing policy states that these activities should be prohibited between 2200-0800 but under the current application this would be difficult to adhere to assuming that the waste is unlikely to be removed during business hours as it would have to pass through customers.
- Parking - Because of the increase in footfall of potential customers, there will inevitably be an increase in the number of vehicles parking and dropping off along the red route and bus lane directly outside the residences of Loampit Hill and Aladdin's Cave. As a number of these Loampit Hill properties have off street parking, we know from experience that visitors to Aladdin's Cave regularly park on this private land without permission (evidence available). Therefore we can assume that this will increase with the proposed change of use. During lockdown there were a number of illegal gatherings at Aladdin's Cave and cars were parked on the Red Route down Loampit Hill towards Lewisham Town Centre.
- The parked cars also block the driveway exits on Loampit Hill and thus access to emergency services for residents. This will only get worse.
- Parking nuisance - Local residents will have to struggle with visitors blocking their driveways or taking their spaces with their cars (Sandrock Road, Tyrwhitt Road, and Somerset Garden are particularly vulnerable). Current Aladdin's Cave suppliers and patrons do not seem to care for parking restrictions, this problem will spread wider if they are displaced by increased business to the 72 Loampit Hill plot.
- Traffic nuisance - The potential for U-turns on Loampit Hill by taxis and drop-offs and pick-ups is increased with potential for accidents (also a public safety issue).
- Traffic nuisance - Somerset Gardens is a very quiet residential road with parking restrictions, but due to it's an oval shape it could use it as a turning point therefore increasing traffic along this narrow road, disturbing local residents.
- Loading issues - There is no suitable location for loading relating to an alcohol licenced premises, nor for specific waste removal. The current business cannot operate within its own capacity limits (see parking nuisances - many of these are suppliers as seen in pictures attached). Current measures in place for Aladdin's Cave are not suitable, existing parking related nuisance which will only be made worse by further business being added.
- Repeated blocking and trespass of private driveways on a daily basis - local residents affected have repeatedly asked for this to stop but it has been ignored.
- Music - music already is sporadically played at Aladdin's Cave, which does not seem to be allowed under their current use licence. This is generally very disruptive and can be heard in local residences including my own - this is not even using a professional sound system - we expect music levels would increase significantly if a license were to be guaranteed. One instance on 15th March 2021 occurred at 7.30am and woke local residents in multiple properties, including myself.

- Fires - waste is regularly burned on the site, producing toxic fumes (also a crime and disorder issue)(pictures available). Increased waste from the alcohol licence suggests this could get worse.
- Drunken behaviour - we have already witnessed persons within 72 Loampit Hill stumbling around the back of the premises, beer in hand, barely able to stand during the day in the middle of the week. Alcohol was also involved when we most recently witnessed someone from Aladdin's Cave urinating on local gardens. This was witnessed by multiple residents. These instances can only get worse if the licence application were granted.
- Other similar businesses - e.g. Mercato Metropolitan, or Lewisham Street Eats, are surrounded by business, and not surrounded by residential buildings, further indicating that this is not an appropriate plot. A licence on 72 Loampit Hill would be a nuisance for the local residential community at any time of day.

The protection of children from harm

- My partner and I hope to start a family soon, but if this license were granted we believe the local environment (due to the exposed nature of ours and other local properties to the 72 Loampit hill site) would become unsuitable to raise a child in.
- Site is in close proximity to two children's nurseries (Busy Bees Lewisham on Somerset Gardens, and Bright Horizons Brockley on Lewisham way), and nearby Ashmead Road Primary School. Children would be coming home from school/nursery past the site during proposed opening hours.
- Children living locally may be impacted in their schoolwork or sleep patterns due to noise from the site - especially as it is possible there will be another wave of Coronavirus and if schools close again children will have to do their schoolwork at home.
- The site overlooks neighbouring houses, with visibility into adjoining gardens and properties where children play, and rear-facing childrens' bedrooms. E.g. Our rear bedroom window is directly visible from the plot, as is the majority of our garden.

In relation to protected species: I have occasionally spotted bats in the evening in my back garden. I, in addition to some other neighbours, worry that the increased noise levels, light pollution and potentially even odours from 72 Loampit Hill will negatively affect their habitat and livelihood. In a planning application for flats on 72 Loampit Hill (RT-MME-126620-02) it was noted that a bat corridor may exist here and requires further monitoring.

Finally, may I please request that you do not share my information with Aladdin's Cave or the applicants for the licence as I fear intimidation or physical retaliation (either to my property or person). I am happy to discuss this if necessary.

In addition to the above relating specifically to the planning objectives, I ask that you please consider the welfare and views of local residents when considering this application.

Objection 27

Sent: 16 April 2021 14:07

To: Licensing

Subject: Objection to Alladins Cave, Loampit hill.

Good afternoon,

I live next to Alladins Cave and they are an absolute nightmare. Horrid people that cause nothing but problems with blocking the pavement, so i can't use my mobility scooter to get by and suffer abuse when told to make way. The rubbish and damage they have contributed to the detriment of all that live near. Rubbish strewn everywhere, rats, shouting and arguing with residents. Blatant disregard for the neighbourhood, let alone the loud noises, horrible staff and now the son has taken over, I'm aghast that he's applied for an alcohol licence? No, I will not stand for it and I will take it to the top because there will be no peace, even worse behaviour and alcohol. They are the most deceitful, dirty, horrible family with vile mouths and no manners. This has my full attention now. You want to destroy a community, this will happen when the dregs arrive and get drunk.

I live in a vulnerable block. A large portion of residents here, like myself, are extremely vulnerable. We are supposed to feel safe and can rely on the councils duty of care to protect us. This case is going to be a nightmare but I will fight tooth and nail to stop these con artists for ruining a peaceful and quiet area and make our life hell and force is to stay scared at home in fear. We're all fed up with the drug dealing, smashed bottles, horrendously drunk idiots and people ruining my garden with urinating and flytipping. The council is still to address this and now this?? No.

Objection 28

Aladdin's Cave, 72 Loampit Hill - License application

Written Representation – Sent Wednesday 14 April 2021

To the Licensing Authority,

I am greatly concerned about the application for a Premises Licence for Aladdin's Cave and the proposal to change the antiques and salvage shop to a food/drinks venue with hours extending from 10:00–00:00 7 days a week (when they currently close at 17:00).

Aladdin's Cave has several close residential neighbours, many of which share boundary fencing, my garden included. My home and garden directly overlook the Aladdin's Cave yard, and my neighbours and I have no confidence that we will be in any way protected from the increased noise, light and smell

Objection 29

Sent: 16 April 2021 15:45

To: Licensing

Cc: Talbot, Emma; vicky.foxcroft.mp@parliament.uk

Subject: Licensing Application and development of Aladdin's Case

Dear Licensing team (with copy to Planning and to Vicky Foxcroft MP),

I am a resident of (address removed) and write with respect to the proposed development and licence application for the Aladdin's Cave site in Loampit Hill.

The application raises a number of concerns and objections in a residential site and conservation area.

General Observations

At the outset however we would like to say that we are confused by the application.

First, the site is currently used as a junk/second hand furniture shop and would expect that an application for change of use would be necessary for it to now operate as a licensed bar. Given that the site is in a conservation area, we would expect certain permissions to be required prior to the works being carried out to works to convert the site being carried out. As far as we know this has not been done and we reserve our position to make reservations in this regard should such permissions be sought in the future. For now, however, we note that we have a concern about the "creep effect" of this application, in that once an alcohol licence is secured it could be used to help justify a change of use application. We do not believe that should be the proper way to go about matters and all required applications should be sought in the appropriate order.

Second, we find the application unclear in what precisely the venue will be for which the licence is sought. The application refers to a bar and arts and crafts stalls and food stalls but there is little specificity, and this brings with it a great deal of nervousness as to how the licence will be used in practice.

Third, the licence is sought by individuals yet there is reference to an external operator running the site. This again makes us nervous that those with responsibility for the licence will not be operating the site and this brings with it concerns as to accountability and compliance.

The Conservation Areas

The Aladdin's Cave site lies within the St Johns Conservation Area and directly abuts the Somerset Gardens Conservation Area. The Aladdin's Cave site directly abuts the back gardens of Nos 1-12 Somerset Gardens. Conservation areas are designated as such because they have appearance of which it is desirable to preserve or enhance. A licence for the site to be used in the way suggested in the application would not be in accordance this

this. In fact no regard has been paid to conservation area status of the site in the application and the use of the Aladdin's Cave site must in our view be consistent with the spirit and regulations of the Conservation Area.

Application for an entertainment and alcohol licence

The application is being made for a licence to be effective 7 days a week from 10am to midnight, for the sale and consumption of alcohol and the provision of live music, with occasional later hours on holiday occasions. We find this excessive and extremely worrying.

Public Safety

The site is accessed from an incredibly busy A road and is on a red route. Many children walk up and down the path to nurseries and schools (two nurseries are within 75 yards). It is extremely busy and navigating it can already be problematic. There is a bus stop serving four TFL bus routes, directly outside the Aladdin's Cave site, frequently used by the elderly and by schoolchildren among others. It is not difficult to imagine problems on a pavement which is the only route to several schools and nurseries. This is exacerbated by the extensive hours for which the licence is sought and the site will be in operation. Adding to that the flow of people in and out of a drinking establishment is extremely concerning. I notice the applicants have not addressed these issues (which are - or should be – obvious concerns) in the public safety section of the application.

Public Nuisance

The site also appears to be a crowded space, separated from the gardens of residents on Loampit Hill and Somerset Gardens only by a fence, to the detriment, potentially 7 days a week, of the right of the residents to enjoy beneficial use of their properties which are located in a conservation area. We agree with comments made by other residents that loud live music and the noise generated by a large crowd consuming alcohol is not something any resident should have to endure and certainly not one who lives in a conservation area. If it takes place for up to 14 hours a day everyday as the licencing application asks, the health of residents including a large number of young children in Somerset Gardens is very likely to be adversely affected simply by being in their own homes.

As a consequence it seems inevitable that there will be regular complaints under noise abatement and public nuisance regulations, from not only Somerset Gardens but also adjoining areas. There are already 6 pubs (several serving food and alcohol), a Saturday Farmers Market, 4 supermarkets and a large number of food shops and restaurants within a few hundred yards of Aladdin's Cave. We do not believe that the proposed development will bring any new benefit or service to the local area.

With respect, the applicant appears to have paid lip service to public nuisance issues in its application by saying it will place signs requesting quiet exit and also supply taxi numbers. Given the location of the site on an A-road red route customers will need to travel to surrounding streets to be collected from any taxi – extending noise and nuisance issues.

All the streets adjacent to the Aladdin's Cave site are CPZ's from Monday to Saturday inclusive, and there are likely to further difficulties arising from this.

We note the application makes reference to a toilet being provided on site. It is unclear if sufficient toilets will be made available given the potentially large number of attendees at the venue. We fear it is highly likely that the green in the middle of Somerset Gardens will be used for this purpose either because insufficient toilets are made available or by people leaving the venue and waiting there for taxis.

Protection of children from harm

The potential for harm to children by the noise and by the dangers associated with navigation of the path at which access will be gained to the site are set out above and are serious. I find it concerning that these issues have not been considered by the applicant and are not dealt with in their application.

We respectfully request that these points are given due consideration and urge you to visit the site in order that the concerns can be viewed in context.

Objection 30

Sent: 18 April 2021 20:00

To: Licensing

Subject: Aladdins Cave Alcohol Licence Application

To whomever it may concern,

I would like to raise a representation against Aladdin's Cave (72 Loampit Hill) application for an alcohol Licence.

There are a number of concerns regarding this application. They are as follows:

1. The impact of noise on local residents. We already experience an increase of noise from the Talbot Pub. Customers leaving the venue have no respect for the fact it is a residential area and my young children are often woken by noise in the street as customers make their way home. This would increase greatly if Aladdins cave is granted an alcohol licence. The outdoor format will mean a larger local area will be affected by the noise both during the day and at night. Many residents work from home, nearby local nurseries also have very young children that need to sleep during the day.
2. People congregating outside, queuing to gain entry or exiting Aladdins Cave late at night may contribute to crime and civil disorder and cause local residents to feel intimidated.
3. Aladdin's cave already utilizes the pavement outside their store as an illegal extension of the shop, they often block the road with vehicles. This will become worse with alcohol and food deliveries and waste removal should they be granted a licence.
4. Aladdins' Cave have remained open during the Coronavirus pandemic when all non-essential retail was instructed to close
5. The operating hours (10:00 - 00:00, 7 days per week) seem excessive for a licensed premise in a residential area, and would overlap with times when local children go to and from school, and the two nearby nurseries.
6. The potential for nuisance caused by smoke or cooking odours is high given the proposed outdoor food market format.
7. Local residents will have to struggle with visitors blocking their driveways or taking their spaces with their cars (Loampit Hill, Sandrock Road, Tyrwhitt Road, St John's Vale, and Somerset Gardens are particularly vulnerable) It is already extremely difficult for residents to park on Tyrwhitt Road. We already experience the impact of people parking for the Talbot Pub, Doctors surgery on Loampit Hill, local nurseries, St John Train Station, Hilly Fields Park and even other local residents who do not

want to pay the CPZ charge to park on their own roads or visitors of residents who live in a CPZ.

8. Because of the increase in footfall of potential customers, there will inevitably be an increase in the number of vehicles parking and dropping off along the red route and bus lane directly outside the site. This road is already very dangerous with many near misses. Given the fact that many children walk to and from school past Aladdin's Cave, it is a cause for concern.

9. Parts of the site overlook neighbouring houses, with visibility into adjoining gardens and properties where children play, and rear-facing childrens' bedrooms are also visible.

Objection 31

Sent: 19 April 2021 19:12

To: Licensing

Subject: Alcohol licensing

Dear Sir/madam

I want bring up following issues in regards to Alcohol licencing for Aladdin's cave.

The prevention of crime and disorder

- People congregating outside, queuing to gain access, or exiting Aladdin's Cave late at night may contribute to crime and disorder and cause local residents to feel intimidated.
- Aladdin's cave already utilizes the pavement outside their store as an illegal extension of the shop, often extending down past number 70 Loampit Hill and allowing passage through in single file only, with dangerous piles from the yard from either side. This situation will be much more congested with people congregating outside the front as mentioned above. Please note there is a bus stop at the entrance to Aladdin's Cave where the general public (including children) regularly wait, this will only increase the local disorder and make the pavements inaccessible for pedestrians
- Public urination - People who have been consuming alcohol at the proposed site may utilise the surrounding streets or front gardens of nearby properties to relieve themselves (local residents have already witnessed this happening with people coming from Aladdin's Cave during the pandemic)
- Aladdins' Cave have remained open during the Coronavirus pandemic when all non-essential retail was instructed to close
- Bats (protected) have been sighted in the area and the lights, noise and food odours will adversely affect them and their habit. It has been reported in Aladdin's Cave's previous planning application (RT-MME-126620-02 to build new flats on the site) that a bat corridor may exist here and requires further monitoring

Public safety

- The Aladdin's Cave site is in close proximity to the adjoining railway line with low wire fencing the only barrier at points
- The site itself may represent health and safety concerns - e.g., floor is uneven, the site is used as storage for building materials/antiques/other miscellaneous items. This represents a serious fire hazard. They burn many of the materials themselves causing toxic fumes to blow into local gardens.
- Aladdin's Cave is situated on a bend in the road where Lewisham Way transitions into Loampit Hill heading towards Lewisham Town Centre. Currently the number of near misses and accidents we observe is of concern, but with the potential for illegal parking, illegal u-turns, dropping off and increased footfall the potential for an accident is genuine worry

The prevention of public nuisance

- The operating hours (10:00 - 00:00, 7 days per week) seem excessive for a licensed premise in a residential area, and would overlap with times when local children go to and from school, and the two nearby nurseries
- Noise as a particular issue - both in respect of music noise and crowd noise - is likely to be exacerbated by the proposed outdoor format and lack of acoustic barriers
- Noise during the day will affect the many residents currently working from home, and noise from late opening will cause sleep disturbance
- The potential for nuisance caused by smoke or cooking odours is high given the proposed outdoor food market format
- Rubbish removal and deliveries will cause further disturbance, presumably outside the proposed opening hours. The council licensing policy states that these activities should be prohibited between 2200-0800 but under the current application this would be difficult to adhere to assuming that the waste is unlikely to be removed during business hours
- Local residents will have to struggle with visitors blocking their driveways or taking their spaces with their cars (Loampit Hill, Sandrock Road, Tyrwhitt Road, St John's Vale, and Somerset Gardens are particularly vulnerable)
- Because of the increase in footfall of potential customers, there will inevitably be an increase in the number of vehicles parking and dropping off along the red route and bus lane directly outside the site
- There is no suitable location for loading relating to an alcohol licenced premises, nor for specific waste removal. Current measures in place for Aladdin's Cave are not suitable, see existing parking related nuisance which will only be made worse by further business being added
- The additional footfall and consumption of alcohol on the site is likely to cause increased littering in the local area (local residents already suffer from litter being added to their gardens on a daily basis - this is likely to spread)

· The protection of children from harm

- The site is in close proximity to two children's nurseries (Busy Bees Lewisham on Somerset Gardens, and Bright Horizons Brockley on Lewisham way), and nearby Ashmead Road Primary School. Children would be coming home from school/nursery past the site during proposed opening hours
- Children living locally may be impacted in their schoolwork or sleep patterns due to noise from the site
- Parts of the site overlook neighbouring houses, with visibility into adjoining gardens and properties where children play, and rear-facing childrens' bedrooms are visible.

Objection 32

Sent: 19 April 2021 11:42

To: Licensing

Subject: Representation (objection) regarding Aladdin's Cave application for a Premises licence

I am writing to make an objection to the proposed application for a Premises licence to sell alcohol 7 days a week at Aladdin's Cave on Lewisham Way.

The impact on local residents will be huge:

- there will be a strain on local parking, additional littering and rubbish, traffic safety on a red route, additional noise (music and crowds) and food smell pollution in the area, overspill of people blocking the pavement, use of local gardens as toilets etc - this all contributes to disorder and nuisance which the local residents will feel the effects of
- they have applied for a licence from 10am till midnight 7 days a week which is excessive

Objection 33

Sent: 19 April 2021 22:52

To: Licensing

Subject: Objection to the application by Alladins Cave, 72 Loampit Hill. London SE13 7SX

Good evening

I wish to object to the license application made by Alladins Cave. (Their address 72 loampit Hill. SE13 7SX)

My objections are on the following grounds:

1. Protection of children from harm:

My home and garden back onto the site where the application for the license has been made.

My daughter suffers from issues of hypersensitivity and anxiety.

Food smells make her retch and vomit and this brings about a great deal of anxiety and distressing for her. She is identified as a vulnerable student within school and has an EHCP Government funded plan for her education and welfare.

She is also hypersensitive to noise and requires an environment where she is able to access sufficient sleep in order to function particularly within school.

The granting of the application that would allow music to be played, and food to be prepared and consumed on these premises would mean that she would be constantly disturbed by noise and smells throughout the day and up until midnight and this would severely affect her mental health.

Furthermore her bedroom directly faces the site and due to the raised position of the site patrons could look into her bedroom window.

This would be a safeguarding issue and completely unacceptable.

This would also cause her continual anxiety.

She needs a quiet environment to work due to her particular needs and the noise and food smells would prevent this from happening for her.

I have three children and the window onto my upstairs landing would be able to be seen through by potential patrons. The window stretches from the floor upwards and my children could be seen at all times from 10am-midnight. They could be unclothed after having a bath etc and this as a safeguarding issue as they could potentially be photographed or filmed etc. It would also mean that their privacy would be violated.

The noise and smells from the site would prevent my children enjoying their garden in the day and these would continue through the evening until midnight. This would also prevent the children from sleeping. My baby particularly also sleeps during the day as well as in the evening. This would affect their mental health and well-being. There is no natural sound barrier between my garden and home and the site. The noise would particularly carry at night and prevent my children from resting adequately.

2. Prevention of crime and disorder

These issues are causing me a great deal of worry and I would ask that this license application is rejected.

It would affect the quality of life for all my children and the issue of the public patrons overlooking into our home would be an unacceptable safeguarding issue for my children.

Objection 34

Sent: 16 April 2021 09:04

To: Licensing

Cc: vicky.foxcroft.mp@parliament.uk

Subject: Alladin's Cave Alcohol Licence Application

Dear Sir or Madam,

I am including my MP and wish to request that she consider opposing this application.

The social impact of this application is overwhelmingly negative. There are ample pubs and restaurants within 5 minutes. Therefore, this application is not necessary, not proportionate, and not justified.

Tyrwhitt Road has had a surge in anti-social behaviour and the police have made entry to effect arrests on at least three occasions in the last three months. There is a risk that an increase in the availability of alcohol correlates, or causes, a link in anti-social behaviour.

Tyrwhitt Road has a mixed demographic which includes vulnerable groups. The change in use is substantive and therefore so are the risks.

The grounds of my objection are detailed below:

The prevention of crime and disorder

- People congregating outside, queuing to gain access, or exiting Aladdin's Cave late at night may contribute to crime and disorder and cause local residents to feel intimidated.
- Aladdin's cave already utilizes the pavement outside their store as an illegal extension of the shop, often extending down past number 70 Loampit Hill and allowing passage through in single file only, with dangerous piles from the yard from either side. This situation will be much more congested with people congregating outside the front as mentioned above. Please note there is a bus stop at the entrance to Aladdin's Cave where the general public (including children) regularly wait, this will only increase the local disorder and make the pavements inaccessible for pedestrians
- Public urination - People who have been consuming alcohol at the proposed site may utilise the surrounding streets or front gardens of nearby properties to relieve themselves (local residents have already witnessed this happening with people coming from Aladdin's Cave during the pandemic)
- Aladdins' Cave have remained open during the Coronavirus pandemic when all non-essential retail was instructed to close

- Bats (protected) have been sighted in the area and the lights, noise and food odours will adversely affect them and their habit. It has been reported in Aladdin's Cave's previous planning application (RT-MME-126620-02 to build new flats on the site) that a bat corridor may exist here and requires further monitoring

Public safety

- The Aladdin's Cave site is in close proximity to the adjoining railway line with low wire fencing the only barrier at points
- The site itself may represent health and safety concerns - e.g., floor is uneven, the site is used as storage for building materials/antiques/other miscellaneous items. This represents a serious fire hazard. They burn many of the materials themselves causing toxic fumes to blow into local gardens.
- Aladdin's Cave is situated on a bend in the road where Lewisham Way transitions into Loampit Hill heading towards Lewisham Town Centre. Currently the number of near misses and accidents we observe is of concern, but with the potential for illegal parking, illegal u-turns, dropping off and increased footfall the potential for an accident is genuine worry

The prevention of public nuisance

- The operating hours (10:00 - 00:00, 7 days per week) seem excessive for a licensed premise in a residential area, and would overlap with times when local children go to and from school, and the two nearby nurseries
- Noise as a particular issue - both in respect of music noise and crowd noise - is likely to be exacerbated by the proposed outdoor format and lack of acoustic barriers
- Noise during the day will affect the many residents currently working from home, and noise from late opening will cause sleep disturbance
- The potential for nuisance caused by smoke or cooking odours is high given the proposed outdoor food market format
- Rubbish removal and deliveries will cause further disturbance, presumably outside the proposed opening hours. The council licensing policy states that these activities should be prohibited between 2200-0800 but under the current application this would be difficult to adhere to assuming that the waste is unlikely to be removed during business hours
- Local residents will have to struggle with visitors blocking their driveways or taking their spaces with their cars (Loampit Hill, Sandrock Road, Tyrwhitt Road, St John's Vale, and Somerset Gardens are particularly vulnerable)
- Because of the increase in footfall of potential customers, there will inevitably be an increase in the number of vehicles parking and dropping off along the red route and bus lane directly outside the site
- There is no suitable location for loading relating to an alcohol licenced premises, nor for specific waste removal. Current measures in place for Aladdin's Cave are not suitable, see existing parking related nuisance which will only be made worse by further business being added
- The additional footfall and consumption of alcohol on the site is likely to cause increased littering in the local area (local residents already suffer from litter being added to their gardens on a daily basis - this is likely to spread)

The protection of children from harm

- The site is in close proximity to two children's nurseries (Busy Bees Lewisham on Somerset Gardens, and Bright Horizons Brockley on Lewisham way), and nearby Ashmead Road Primary School. Children would be coming home from school/nursery past the site during proposed opening hours
- Children living locally may be impacted in their schoolwork or sleep patterns due to noise from the site
- Parts of the site overlook neighbouring houses, with visibility into adjoining gardens and properties where children play, and rear-facing childrens' bedrooms are visible

Objections 35

Sent: 19 April 2021 21:35

To: Licensing

Subject: Aladdin's Cave, 72 Loampit Hill - License application - Written Representation

To the Licensing Authority

We are extremely concerned about the application for a Premises licence for Aladdin's Cave, and their proposal to change the antiques and salvage shop to a drinks venue with hours extending beyond their current shop hours to 10:00 am – 00:00, 7 days per week.

You will have already received a written representation from my partner who lives with me at this address, however I wanted to send in one separately in order to emphasise how strongly we feel about this matter.

Aladdin's Cave has several close residential neighbours. Our Communal garden for our block of flats at (address removed) shares a boundary fence with Aladdin's Cave, and as a result I am raising this representation to the council to oppose granting this license, in either its current or reduced form, for the reasons outlined below.

If you have any queries regarding the points raised below, please do not hesitate to contact me.

The prevention of crime and disorder:

- There is Concern about people congregating outside or queuing to gain access at the front of Aladdin's Cave and the properties on Loampit Hill. There is a bus stop at the entrance to Aladdin's Cave where the general public (including children) regularly wait.
- We have already encountered customers / friends of Aladdin's cave urinating in our front garden whilst the shop has been closed during the public lockdown. We only foresee this problem getting worse if an alcohol license is granted.

Public safety:

- Aladdin's Cave is in close proximity to the adjoining railway line with low wire fencing the only barrier at points, customers under the influence of alcohol may put themselves in danger when exiting the premises.
- The site itself in its current state represents health and safety concerns - e.g., floor is uneven, site is used as storage for building materials.
- Aladdin's Cave is situated on a bend in the road where Lewisham Way transitions into Loampit Hill heading towards Lewisham Town Centre. Crossing the road can already be dangerous when there are more than the designated vehicles parked in the road for Aladdins cave (which there regularly are), we can only see this getting worse with higher traffic volumes e.g. taxis picking up customers.

- The Likelihood of increased number of U-turns on Loampit Hill by taxis dropping off and picking up customers is increased with high potential for accidents, the bend in the road as mentioned above causing reduced vision for vehicles travelling south towards Lewisham already.

The prevention of public nuisance:

- The operating hours (10:00 - 00:00, 7 days per week) seem excessive for a licensed premise in a highly residential area, and would overlap with times when local children go to and from school
- Late night opening represents a potential noise problem for neighbours in both Loampit Hill (adjacent), Somerset Gardens (which adjoins the rear of the site) and Whidborne Close/Cliff Terrace (across the railway)
- All surrounding properties are currently utilised only for residential purposes and therefore noise, light and food odours will be detrimental to the quality of life, in particular sleep disturbance.
- Noise from both music and the crowd in the bar, is likely to cause particular disturbance given the current lack of sound barrier between Aladdin's Cave and the neighbouring properties. We have already experienced disturbed sleep as a result of the current owners playing music loudly.
- The potential for nuisance caused by smoke or cooking odours is high given the proposed outdoor food market format, as above, given the lack of barriers between Aladdin's Cave and the neighbouring properties any smoke would go directly into residential gardens.
- Rubbish removal and deliveries will cause further disturbance, presumably outside the proposed opening hours, likely in the early hours of the morning.
- Because of the increase in footfall of potential customers, there will inevitably be an increase in the number of vehicles parking and dropping off along the red route and bus lane directly outside the residences of Loampit Hill and Aladdin's Cave.
- A number of Loampit Hill properties have off street parking, we know from experience that visitors to Aladdin's Cave regularly park on this private land without permission. We assume that this will increase with the proposed change of use.

The protection of children from harm:

- The Site is in close proximity to two children's nurseries (Busy Bees Lewisham on Somerset Gardens, and Bright Horizons Brockley on Lewisham way), and nearby Ashmead Road Primary School. Children would be coming home from school/nursery past the site during proposed opening hours.
- Children living locally may be impacted in their schoolwork or sleep patterns due to noise from the site
- If customers did not remain in the proposed area of use of the site, and/or are allowed to use the rest of the property, they could from other parts of the site overlook neighbouring houses, with visibility into adjoining gardens and properties where children play, and rear-facing childrens' bedrooms.

We don't believe that the sale of alcohol for any length of time on these premises is conducive to a safe and nuisance free residential area.

Objection 36

Sent: 16 April 2021 16:33

To: Licensing

Subject: Aladdin cave licence application

Hi

I would like to strongly object to the application on the grounds that the play of music ever day till late will affect me and others in the area. With so many families with young children in the area I no this will affect them all .As to the selling of alcoholic this is the last service we need in this area and the unsocial behaviour that follows it. Having lived my younger years next to a pub I no full well the problems as a young man not getting to sleep and school next day. With a college and two play schools and a surgery so close I fill this is totally wrong and a safety risk to all. Please fill free to contact me .

Objection 37

Sent: 20 April 2021 17:38

To: Licensing

Cc: chair@st-johns-soc.org

Subject: Objection to Aladdin's Cave alcohol license (Loampit Road)

Hello,

I hope it isn't too late to send this as I've just seen the cutoff is today.

I'm a resident on (address removed) and while I love the idea of adding more cultural spirit to the area, I'm concerned about noise and safety if Aladdin's Cave is approved an alcohol license seven days a week until midnight.

The gate in the wall entrance on Loampit Hill isn't always locked, and being so close to Aladdin's Cave I worry that there would be more foot traffic through our Close and past our homes, which at the moment have a lovely tranquil, private community feel. Intoxicated individuals may be reckless and loud, interfering with our peace in this residential area.

If a license was to be approved, it would be great if it could have a strict, early cut off time and was only weekends, perhaps.

Objection 38

Sent: 20 April 2021 18:14

To: Licensing

Subject: Licence Application- Aladdin's Cave

To Whom It May Concern,

I am writing to raise my objection to the application by Aladdin's Cave. It is my understanding that the proposal is for an outdoor facility with a bar, seated area and stalls including street food stalls. This application would allow the sale of alcohol for consumption both on and off the premises from 10am until midnight every day.

(address removed) and would like to raise the following objections. The property in which i live backs onto Aladdin's Cave property as do other homes on our street. I live with my 8 year old daughter and her bedroom is at the rear of the property. I feel the noise that may result from the venues change will disrupt and affect her sleep. As an outdoor venue, attracting a crowd of people there will inevitably be noise which will be heard at our property and most importantly during the hours she will be sleepinh. I am also concerned that there will be an increase in litter and discarded items as people leave the premises-in am area where my daughter plays. I hope my views will be considered and taken into account when considering the licence application.

Kind Regards

Objection 39

Sent: 19 April 2021 18:40

To: Licensing

Subject: Aladdin's cave - Alcohol Licence Application

Dear Sir/Madam

I want to make my appeal against Aladdin's cave alcohol licensing and below are my and my family concerns.

Thank you and kind regards

Mo

The prevention of crime and disorder

- People congregating outside, queuing to gain access, or exiting Aladdin's Cave late at night may contribute to crime and disorder and cause local residents to feel intimidated.
- Aladdin's cave already utilizes the pavement outside their store as an illegal extension of the shop, often extending down past number 70 Loampit Hill and allowing passage through in single file only, with dangerous piles from the yard from either side. This situation will be much more congested with people congregating outside the front as mentioned above. Please note there is a bus stop at the entrance to Aladdin's Cave where the general public (including children) regularly wait, this will only increase the local disorder and make the pavements inaccessible for pedestrians
- Public urination - People who have been consuming alcohol at the proposed site may utilise the surrounding streets or front gardens of nearby properties to relieve themselves (local residents have already witnessed this happening with people coming from Aladdin's Cave during the pandemic)
- Aladdins' Cave have remained open during the Coronavirus pandemic when all non-essential retail was instructed to close
- Bats (protected) have been sighted in the area and the lights, noise and food odours will adversely affect them and their habit. It has been reported in Aladdin's Cave's previous planning application (RT-MME-126620-02 to build new flats on the site) that a bat corridor may exist here and requires further monitoring

Public safety

- The Aladdin's Cave site is in close proximity to the adjoining railway line with low wire fencing the only barrier at points
- The site itself may represent health and safety concerns - e.g., floor is uneven, the site is used as storage for building materials/antiques/other miscellaneous items. This represents a serious fire hazard. They burn many of the materials themselves causing toxic fumes to blow into local gardens.
- Aladdin's Cave is situated on a bend in the road where Lewisham Way transitions into Loampit Hill heading towards Lewisham Town Centre. Currently the number of near misses and accidents we observe is of concern, but with the potential for illegal parking, illegal u-turns, dropping off and increased footfall the potential for an accident is genuine worry

The prevention of public nuisance

- The operating hours (10:00 - 00:00, 7 days per week) seem excessive for a licensed premise in a residential area, and would overlap with times when local children go to and from school, and the two nearby nurseries
- Noise as a particular issue - both in respect of music noise and crowd noise - is likely to be exacerbated by the proposed outdoor format and lack of acoustic barriers
- Noise during the day will affect the many residents currently working from home, and noise from late opening will cause sleep disturbance
- The potential for nuisance caused by smoke or cooking odours is high given the proposed outdoor food market format
- Rubbish removal and deliveries will cause further disturbance, presumably outside the proposed opening hours. The council licensing policy states that these activities should be prohibited between 2200-0800 but under the current application this would be difficult to adhere to assuming that the waste is unlikely to be removed during business hours
- Local residents will have to struggle with visitors blocking their driveways or taking their spaces with their cars (Loampit Hill, Sandrook Road, Tyrwhitt Road, St John's Vale, and Somerset Gardens are particularly vulnerable)
- Because of the increase in footfall of potential customers, there will inevitably be an increase in the number of vehicles parking and dropping off along the red route and bus lane directly outside the site
- There is no suitable location for loading relating to an alcohol licenced premises, nor for specific waste removal. Current measures in place for Aladdin's Cave are not suitable, see existing parking related nuisance which will only be made worse by further business being added
- The additional footfall and consumption of alcohol on the site is likely to cause increased littering in the local area (local residents already suffer from litter being added to their gardens on a daily basis - this is likely to spread)

. The protection of children from harm

- The site is in close proximity to two children's nurseries (Busy Bees Lewisham on Somerset Gardens, and Bright Horizons Brockley on Lewisham way), and nearby Ashmead Road Primary School. Children would be coming home from school/nursery past the site during proposed opening hours

- Children living locally may be impacted in their schoolwork or sleep patterns due to noise from the site
- Parts of the site overlook neighbouring houses, with visibility into adjoining gardens and properties where children play, and rear-facing childrens' bedrooms are visible

Objection 40

Sent: 20 April 2021 20:32

To: Licensing

Subject: Aladdin's Cave - Alcohol Licence Application Representation

To whom it may concern : Representation

The prevention of crime and disorder

- People congregating outside, queuing to gain access, or exiting Aladdin's Cave late at night may contribute to crime and disorder and cause local residents to feel intimidated.
- Aladdin's cave already utilizes the pavement outside their store as an illegal extension of the shop, often extending down past number 70 Loampit Hill and allowing passage through in single file only, with dangerous piles from the yard from either side. This situation will be much more congested with people congregating outside the front as mentioned above. Please note there is a bus stop at the entrance to Aladdin's Cave where the general public (including children) regularly wait, this will only increase the local disorder and make the pavements inaccessible for pedestrians
- Public urination - People who have been consuming alcohol at the proposed site may utilise the surrounding streets or front gardens of nearby properties to relieve themselves (local residents have already witnessed this happening with people coming from Aladdin's Cave during the pandemic)
- Aladdins' Cave have remained open during the Coronavirus pandemic when all non-essential retail was instructed to close
- Bats (protected) have been sighted in the area and the lights, noise and food odours will adversely affect them and their habit. It has been reported in Aladdin's Cave's previous planning application (RT-MME-126620-02 to build new flats on the site) that a bat corridor may exist here and requires further monitoring

Public safety

- The Aladdin's Cave site is in close proximity to the adjoining railway line with low wire fencing the only barrier at points
- The site itself may represent health and safety concerns - e.g., floor is uneven, the site is used as storage for building materials/antiques/other miscellaneous items. This represents a serious fire hazard. They burn many of the materials themselves causing toxic fumes to blow into local gardens.
- Aladdin's Cave is situated on a bend in the road where Lewisham Way transitions into Loampit Hill heading towards Lewisham Town Centre. Currently the number of near misses and accidents we observe is of concern, but with the potential for illegal parking, illegal u-turns, dropping off and increased footfall the potential for an accident is genuine worry

The prevention of public nuisance

- The operating hours (10:00 - 00:00, 7 days per week) seem excessive for a licensed premise in a residential area, and would overlap with times when local children go to and from school, and the two nearby nurseries
- Noise as a particular issue - both in respect of music noise and crowd noise - is likely to be exacerbated by the proposed outdoor format and lack of acoustic barriers
- Noise during the day will affect the many residents currently working from home, and noise from late opening will cause sleep disturbance
- The potential for nuisance caused by smoke or cooking odours is high given the proposed outdoor food market format
- Rubbish removal and deliveries will cause further disturbance, presumably outside the proposed opening hours. The council licensing policy states that these activities should be prohibited between 2200-0800 but under the current application this would be difficult to adhere to assuming that the waste is unlikely to be removed during business hours
- Local residents will have to struggle with visitors blocking their driveways or taking their spaces with their cars (Loampit Hill, Sandrock Road, Tyrwhitt Road, St John's Vale, and Somerset Gardens are particularly vulnerable)
- Because of the increase in footfall of potential customers, there will inevitably be an increase in the number of vehicles parking and dropping off along the red route and bus lane directly outside the site
- There is no suitable location for loading relating to an alcohol licenced premises, nor for specific waste removal. Current measures in place for Aladdin's Cave are not suitable, see existing parking related nuisance which will only be made worse by further business being added
- The additional footfall and consumption of alcohol on the site is likely to cause increased littering in the local area (local residents already suffer from litter being added to their gardens on a daily basis - this is likely to spread)

The protection of children from harm

- The site is in close proximity to two children's nurseries (Busy Bees Lewisham on Somerset Gardens, and Bright Horizons Brockley on Lewisham way), and nearby Ashmead Road Primary School. Children would be coming home from school/nursery past the site during proposed opening hours
- Children living locally may be impacted in their schoolwork or sleep patterns due to noise from the site
- Parts of the site overlook neighbouring houses, with visibility into adjoining gardens and properties where children play, and rear-facing childrens' bedrooms are visible

Objection 41

Sent: 20 April 2021 21:08

To: Licensing

Cc: chair@st-johns-soc.org

Subject: Aladdin's Cave, 72 Loampit Hill Lewisham SE13 7SX - Licence Application

sent 20 April 2021

To the Licensing Authority

I am writing to register my opposition to the **application for a premises license for Aladdin's Cave, 72 Loampit Hill Lewisham SE13 7SX.**

In spite of its frontage onto a major road and its proximity to the railway line, Aladdin's Cave is located in a quiet conservation area with many families and young children. My daughter and her partner live in 70a Loampit Hill and share a long boundary with their property. I am there often, as she is my only local family and she supports me with my chronic respiratory illness.

The current way in which those running Aladdin's Cave operate demonstrates their consistent disregard for public safety and lack of consideration to their neighbours. Granting 72 Loampit Hill a licence for alcohol consumption on and off the premises from 10am to midnight seven days a week would be seriously detrimental to the area, and would not satisfy the licensing objectives, whether under the current management or under alternative arrangements.

My objections, detailed below, apply in many cases to an already existing situation, and an alcohol license would only make the current problems far worse.

The prevention of crime and disorder

- Aladdin's Cave seem happy to ignore restrictions: they were open during lockdown, and have hosted large gatherings with loud music in unlicensed premises with intoxicated customers spilling out onto the street and entering neighbouring front gardens, urinating and leaving rubbish behind

-If a license were granted the crowds could be there from 10am to at least midnight, consuming alcohol both on and off the premises, seven days a week greatly increasing the potential for crime and disorder

-The crowds can be unpleasant and intimidating, I would have to pass them on a regular basis on my way to the train station, which is concerning for an older woman, especially in light of the current anti-Asian (Chinese) sentiment

-The fence along the long boundary between Aladdin's Cave and my daughter's garden is flimsy and

quite inadequate as a barrier between the two properties. This already leads to a lack of privacy and rubbish and projectiles being thrown into the garden. It is also quite easy to climb over, posing a risk of trespass and damage by strangers coming into the garden late at night

-Cars associated with the business at Aladdin's Cave frequently stop on private property and block local driveways. In my daughter's case this affects her work as a doctor on call at all hours, and also her ability to drive me when necessary. The attached photos show several examples, all taken within the past week. Licensed premises would only increase the number of vehicles and make the problem worse

Public Safety

-The applicants want to develop 72 Loampit Hill into a venue for music, food and alcohol consumption late into the night. This is inappropriate in a residential family neighbourhood and quite damaging to the character of the conservation area. Their disregard for public safety and lack of consideration for their neighbours is clearly demonstrated by their current track record, and there is no reason to expect that this would change in the future even under different management, because of the nature of the site and the premises

-The premises are not soundproof and it is unclear if they conform to the relevant building and safety regulations. Clearly there are inadequate toilet facilities, as customers use the streets and nearby front gardens to this end

-The fencing along the property boundaries are inadequate as barriers, either to prevent disturbance and incursions into neighbouring properties or to prevent customers from accessing the adjoining rail tracks

-The current operators of Aladdin's Cave regularly dispose of their excess stock by burning it in their backyard. The materials include treated and painted wood and possibly other hazardous materials. These generate toxic smoke, which blankets nearby gardens and is particularly harmful for people like me, who suffer from respiratory conditions

-Sometimes the materials are burned right at the boundary of the property. This has resulted in the death of a large protected tree in my daughter's garden, which now poses a potential hazard to both their and their neighbours' gardens, as well as to customers in the grounds of Aladdin's Cave itself

-If a licence is granted, the fires would be replaced by large numbers of people smoking outside, which would make it difficult for me to go out on the garden or even, for that matter, to stay indoors with the windows open

The prevention of public nuisance

-The excessive opening hours (10am to midnight, seven days a week) are totally inappropriate in a residential neighbourhood where residents need to be able to rest at nights (adults need to work and children need to go to school)

-In particular, the music and general noise generated by their current (unlicensed?) activities is loud enough that it can be heard across a wide area, including, I understand, by residents across the

railway tracks

-As mentioned above, the crowds that the proposed venue attracts can be unruly and intimidating, with many individuals often trespassing on private property and blocking residents' access to parking. A licence that also allows alcohol consumption OFF the premises will only ensure that the disruption extends over a wider area and continues well beyond the allowed opening hours

-The organisers of events at Aladdin's Cave do not seem willing or able to keep their customers from creating serious disruption in the neighbourhood and distress to the residents and their families

In sum, given (1) the nature of the existing premises and proposed future operations (2) their location within the St John's Conservation Area and the wider neighbourhood and (3), the issues under the current management which show widespread disregard for rules and total lack of consideration to others, I urge the Licensing Authority to refuse the application

Objection 42

Sent: 20 April 2021 17:29

To: Licensing

Subject: Re: License for Aladdins Cave

Hello,

This is a totally unacceptable licensing application. What a place to have a drinking establishment!

Think of the schoolchildren and OAPs using the bus stop outside.

What about the noise, nuisance and litter this will cause for all local residents?

This cannot be considered a suitable place for a pub. There are plenty of others in the area and another one is unnecessary,

Objection 43

Sent: 20 April 2021 17:00

To: Licensing; Sophie McGeevor; Penfold, Cllr Stephen;; Adefiranye, Cllr Obajimi

Subject: Objection to Licence Application Aladdins Cave 72 Loampit Hill SE13

Dear Sir/Madam,

I write to object to this Application as the owner/occupant of

We do not give permission for our personal details to be furnished to the Applicant. Our objections should be redacted to remove all personal information or any information that identifies us. If it is required by law that they are made known to the Applicant then please seek our express written consent before doing so.

is situated immediately behind and across the railway line from the Aladdin's Cave premises. At its closest I would estimate we are within 25 metres of the boundary of that property.

We object completely to the licences and periods of licence being sought by the owners/occupiers of Aladdin's Cave for the sale of alcohol on and off premises and also, as we understand it to be, for the playing of music and provision of food.

We will address the criteria for objection in due course.

In the first instance, we make this objection now, having only recently been made aware that there was an application pending. Whilst we are told that notices have been placed on the highway adjacent to the premises, during this pandemic and periods of lockdown and shielding for vulnerable residents, many people, including ourselves have not been in any position to view these notices. No information has been sent to us directly as an affected neighbour and such limited information as there is only came to our attention as members of the local St John's Society. Similarly, no information has been made readily available by the London Borough of Lewisham online to enable the public to search for and consider the full details of the application. It is unreasonable to expect members of the public to visit a council premises to view relevant information during a pandemic. Such lack of adaptations to the procedure may be seen by a court as unreasonable should such a challenge be made.

Objections to the Application.

In our strong view the effect of granting such licence(s) would negatively impact upon all 4 of the licensing objectives in addition to the requirements of all public authorities to act in accordance with the law, in particular the Human Rights Act 1998, not to unlawfully interfere with the protected rights to the enjoyment of private and family life and to the enjoyment of private property. We consider that to grant such a licence would violate our rights in that regard.

The prevention of crime and disorder

Public safety

The prevention of public nuisance

The protection of children from harm

The premises are in predominantly residential area front and rear. The licence proposes is for the all day and late at night sales of alcohol and as we understand it, the sale of food and provision of entertainment including amplified music. The planned business will be carried out outside in the open air adjacent to and to the rear of the old railway station building which will continue to operate as a second hand/junk shop.

Public nuisance includes not just behaviour but noise and light pollution and pollution caused by smell and litter. It is already the case, being adjacent to a railway line, that there is a significant vermin problem. A business selling food and alcohol outside will inevitably generate waste that will attract more vermin, particularly rats, which are seen regularly around the area.

If this goes ahead, the noise of large crowds of people late at night, the smell of cooking materials (cooking oils, charcoals, diesel generators etc) will cause a serious public nuisance to the residential areas to the rear and to the side of the premises, every evening. The residential area contains many nearby family homes and families with children. These properties will experience serious nuisance in the event that the business is permitted to proceed with its plans. It is also extremely likely that the exit to the premises on Loampit Hill will become a gathering point in and out of the premises, and alcohol sales until late at night, will cause the fallout from closing time to interfere with the quiet residential character of the area, including an increase in drunken behaviour, urination in the streets, public littering and other delinquent and criminal conduct and will generally contribute to the lack of safety on the streets already experienced by many local people, including women walking alone and elderly residents, not least those who need to wait for buses immediately outside the premises, alone or with children. This area is singularly ill-suited to such a business.

Children, like all other residents are entitled to safe and quiet enjoyment of their local area. For the above reasons, children will be exposed to noise and other pollution late at night, interfering with their home lives and also sleep patterns if they are very close residents. Sales of alcohol all day and night next to a pre-school nursery and on busy school and college routes will mean an inevitable increase in the levels of drunkenness in the vicinity and anti-social behaviour detrimental to the safety of children. As a business which proposes to sell alcohol outside all day and night and with no experience of being a publican or off sales business there is a very serious risk that this will provide easier opportunities for irresponsible and under-age drinking than in a traditional public house setting. The applicants have no known experience or track record in this regard.

Article 8 European Convention On Human Rights (ECHR)

Protocol 1 Article 1 (ECHR)

Local residents have the right to the quiet enjoyment of their family and private life and property.

The licensing authorities are under a duty to not to do anything that would disproportionately interfere with these rights and may be liable for any such violations should the licence be granted having failed to properly take into account the impact on local residents.

No impact assessment of noise, light or pollution levels has been carried out. Local residents have not been consulted about the plans. Local residents were told previously that the premises were to be used as a private residential development.

An onsite inspection of the premises will show clearly how significant the interference with neighbouring residential properties would be. Noise of large parties of people drinking and socialising, together with music, would be akin to a festival or large outdoor party being permitted every evening. This would render the outdoor spaces of residential properties unusable and windows would need to remain permanently closed. The experience of neighbours of other catering businesses to the rear of Lewisham Way in being subject to significant cooking waste pollution even with the benefit of expensive extractor units has been considerable and is well documented by Lewisham Council. The proposal to host foodstalls outside along with alcohol will mean that the smells of cooking will invade a significant area behind the premises, into neighbouring properties. The smell of burning and old cooking fats is a long and lingering smell and very pervasive, it is not at all suitable to such a location. Where the business models this on other successful similar ventures, all such examples are usually in industrial or post industrial areas (railway arches, derelict or development sites) This is a mature, quiet residential, conservation area.

Experience of the successful Brockley Market on Lewisham Way shows that the noise of generators for food trucks, and the smell of cooking is significant. That enterprise is only for 1 morning (saturdays) a week at weekends and has no on the premises alcohol sales.

The Talbot Public House on Tyrwhitt Rd is less than 100 metres from the proposed licensed premises. Great efforts to manage noise and disorderly conduct at the pub have been made by the current landlords. Increasing the footfall and general noise and nuisance in the vicinity considerably,

particularly if the licence for the Aladdins Cave premises is later than the public house which will lead to more people leaving that pub to enjoy later drinking across the road. The potential for serious accidents on a dangerous stretch of the main road as this becomes a significant social hub will be increased. The exit space gives immediately on to a narrow pavement and fast major thoroughfare. Again, no local impact or road safety assessment has been carried out.

There is no need for further off-sales in this area. There is already a public house and an off-licence opposite and several mini-markets within a short walk all selling alcohol.

I trust that all these issues will be considered when arriving at a decision but in the event that this application is referred for a hearing, we would be willing to reiterate our objections as evidence in that forum.

Objection 44



**METROPOLITAN
POLICE**

Working together for a safer London

TERRITORIAL POLICING

PL - Lewisham Borough

9 Holbeach Road,
Catford. SE6 4TW

Telephone: 07795 801039

Email: Simon.Butler@met.police.uk

www.met.police.uk

Your ref:

Our ref:

20th April 2020

Dear Licensing Team,

Police Licensing has received an Application for a New Premises Licence at Aladdin's Cave, 72, Loampit Hill, Lewisham SE13 7SX, as a relevant authority during the application process.

Police wish to object to this Application on the grounds of Concerns over Public Safety and Crime and Disorder. I am a Police Officer who has worked on the Lewisham Borough for over 18 years and know the location of where the planned Application has been applied for.

I must admit that in my capacity as a Police Officer, I have never been inside this planned application site, until Monday 19th April when meeting with Food Safety Officer at the location in order to get an idea of the layout of the Premises planned.

On original submission of the application, I had noted by the plans that had been submitted, with the location being directly along a main route Rail Network line into London, was a concern. As Police Licensing Officer, a Condition to include the use of Substantial Fencing to be introduced to the Boundary to the Rail Line. On visiting the site, I must state that a Considerable amount of work must be done in order that Public Safety is catered for.

Having now had a chance to visit the site in person and looking at this unique and very individual site police have some serious concerns around some various points after the recent visit.

The site is situated on a main road with what appears to be only one entry and exit point.

There is a Retail outlet that will remain on site and operational and is very poorly constructed and this would benefit from an expert to look at this premises for Fire Safety regulations. It is constructed of very old wood and in a state of disrepair and would potentially be positioned near to the entrance/exit point of the Premises in the event of a

Fire. Either side of the Premises is a High wall to residential side and a very steep rail bank leading to a Main Line Railway line with high speed trains, so where would people escape to in event of Fire.

Police wish to draw the Committee's attention to this very steep bank and insufficient weak fencing currently in position and introducing recreational drinkers and the lack of any Safety precautions in place would make this a serious Public Safety issue.

Police understand that the Applicant has not discussed the Boundary with the Rail Company and if they would require access to the fencing or who is responsible for this Boundary. This would be a must prior to allowing any Premises to operate on this location.

The site has very poor ground work and deep holes and with the potential in an evening to be a major hazard and hamper safety.

Having read the application and finding that there is No detail in various issues relating to Public Safety in place. What to do in the event of a Fire, Escape and Evacuation after an incident taking place. Concerns around the planning and organisational aspects of events that could be held, in conjunction with Crowds of drinkers mixed with irresponsible behaviour would flaunt public safety.

Capacity to the Premises along with a lack of Toilets facilities may also see a rise in Urinating in surrounding streets could increase along with Anti-Social behaviour. Discussions have suggested that only 2 toilets would be provided and depending on the premises capacity that may impact on local areas when customers leave the site.

The final concern relating to this application I believe would be addressed by local residents and neighbours would increase in complaints to Local Authorities around Noise pollution and disturbances to local residents. Although, I would not normally be in direct objection to the hours suggested for the applications operating times, in normal circumstances, this is not a normal premises. This application being uniquely outside would generate an increase in noise complaints and disturbances to local residents and lead to an increase in complaints and an increase in calls to Police of an Anti-Social matter.

I object on grounds of Crime and Disorder and Public Safety.

For your consideration

Regards

Simon Butler

Police Licensing Officer for Lewisham Borough

9 Holbeach Road, Catford SE6 4TW