

# STATEMENT OF LICENSING POLICY

Issued under Section 5(1) of the Licensing Act 2003

Published 7<sup>th</sup> January 2021

Covering the period 7<sup>th</sup> January 2021 to 6<sup>th</sup> January 2026

***Version 6.1***

***[Last updated 23<sup>rd</sup> May 2022]***

## **Document Updates**

Version	Date	Summary of Update
6.0	January 2021	Complete document rewrite. Version 6 published.
6.1	23 May 2022	Appendix H added to the document. This is an updated analysis of the data used produce the Cumulative Impact Zones with data up to February 2022. The zones themselves are unchanged.  Para 11.6 amended to waypoint to new Appendix H. Appendix G retained.

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## Foreword

Royal Greenwich is a great place to live, work and visit – the borough welcomes over 19 million visitors a year and hosts some of London's major attractions, venues and events. Pubs, clubs, restaurants and other businesses selling food and alcohol have an important part to play in the social and cultural life of the borough, as well as the growth of the local economy.

Royal Greenwich is in the midst of a significant regeneration programme, particularly within the town centres, with many new homes and commercial premises, including licenced premises, being created.

We want to support local businesses in operating responsibly, so Royal Greenwich continues to develop as a place of rich cultural heritage and a destination that attracts millions of visitors each year.

We recognise the very positive contribution that well-managed businesses add to the borough, but at the same time, the Council has a duty to make sure that businesses do not harm the right of residents and others, who are entitled to peaceful enjoyment of their neighbourhood and borough.

This updated licensing policy sets out our expectations for new licenced premises and aims to seek a balance, by supporting local businesses to operate responsibly, promoting the continued regeneration already occurring within Royal Greenwich, and also ensuring that the rights of residents are upheld.

Following the licensing objectives, which are outlined in this policy, will ensure that licenced premises are not the source of, or contributors towards, crime and disorder or public nuisance, and that they promote public safety and have measures in place to protect children from harm.

For this reason, the Council has redrawn its Cumulative Impact Zones (CIZs). First introduced in 2008, these designated zones are areas where evidence has indicated that a number, type or density of licenced premises will have an adverse impact on the licensing objectives.

These zones do not seek to prevent new premises from operating in these areas. Rather, they ensure that those that do apply for a premises licence within a CIZ not only take into account the effect of their premises in isolation, but also consider the cumulative impact of their proposed activities in the wider context of an area where there is already a high concentration of other licenced premises, and can demonstrate that they will operate to the very highest standards. This will ensure that our town centres remain vibrant hubs of the community, whilst protecting those residents living within the vicinity.

## Background information about Royal Greenwich

Royal Greenwich lies to the south-east of central London, with the longest uninterrupted stretch of the River Thames running from Deptford in the west to Thamesmead in the east. It is at the heart of the Thames Gateway regeneration area and is bordered to the west by Lewisham, to the south by Bromley, and the east by Bexley. With a land area of 5,087 hectares, Royal Greenwich is the 12th largest borough in London.

The population in the 2011 census was 254,557 residents living in 101,045 households; the estimated population figure for 2013 was 269,176. The population is projected to increase by 83,777 people



between 2013-2041, representing a cumulative growth rate of 31.1 per cent. Royal Greenwich is a culturally and ethnically diverse borough with 27.73 per cent of the population (2011) from Black, Asian and minority ethnic (BAME) groups.

Woolwich is the borough's largest shopping and office employment centre, and Eltham is the second-largest. Maritime Greenwich, which includes Greenwich town centre and Greenwich Park, is a World Heritage Site and a major visitor destination.

There are a variety of entertainment, leisure and cultural venues around Royal Greenwich including The O2, Greenwich Odeon at Greenwich Peninsula, and Charlton Athletic Football Club.

The borough plays host to a wide range of cultural events, some of London-wide significance – like the Greenwich & Docklands International Festival, the London Marathon, and the International Tall Ships Races. There are also a significant number of local community events and festivals.

### **Monitoring the impact of alcohol sales**

The Council and the Police want to help responsible businesses and their customers to enjoy alcohol safely. However, we remain determined to clamp down hard on those who abuse the law or create nuisance or disorder in the community.

We will continue to work closely with the Police to monitor the effects of alcohol consumption on crime and anti-social behaviour.

### **Licensing policy in Royal Greenwich**

The licensing policy was last reviewed in 2015 and published in January 2016. In 2017, in light of legislative changes, the Council made a small amendment to the policy to ensure that it remained relevant and fit for purpose. The minor amendments to the policy reflected government amendments to the Licensing Act 2003. The Statement of Licensing Policy (licensing policy) was subject to public consultation during 2020 and this updated version was published in January 2021, fulfilling the revised five-year maximum lifespan.

Under the Licensing Act, the Royal Borough of Greenwich has a duty to publish the policy it will adopt when it considers licensing applications from businesses that:

- sell or supply alcohol;
- provide entertainment;
- sell hot food or drink between 11:00pm and 5:00am.

This revised Statement of Licensing Policy sets out the way in which the Council will consider applications for such licences.

## 1 Introduction

- 1.1 This Statement of Licensing Policy, as prepared under Section 5 of the Licensing Act 2003 ('the Act') and the amended Guidance issued under Section 182 of that Act, sets out how the Royal Borough, as the Licensing Authority, seeks to promote the licensing objectives. Revisions to the policy and its publication were approved by the Council on 25<sup>th</sup> November 2020. This revised Policy is operative from 7<sup>th</sup> January 2021 until 6<sup>th</sup> January 2026.
- 1.2 The Policy relates to all those activities identified as requiring a licence under the provisions of the Act, namely:
- Retail sale of alcohol;
  - Supply of alcohol to club members;
  - Provision of 'regulated entertainment' – to the public, to club members, or with a view to profit, such as:
    - A performance of a play (above 500 people, or between 23:00 hours and 08:00 hours);
    - An exhibition of a film (above 500 people, or between 23:00 hours and 08:00 hours);
    - An indoor sporting event (above 1000 people, or between 23:00 hours and 08:00 hours);
    - Boxing or wrestling entertainment;
    - A contest, exhibition or display which combines boxing or wrestling with one or more martial arts ("combined fighting sports");
    - A performance of live music (above 500 people, or between 23:00 hours and 08:00 hours);
    - Any playing of recorded music (above 500 people, or between 23:00 hours and 08:00 hours);
    - A performance of dance<sup>1</sup> (above 500 people, or between 23:00 hours and 08:00 hours);
    - Entertainment of a similar description to a performance of live music, any playing of recorded music or a performance of dance (above 500 people, or between 23:00 hours and 08:00 hours); or
  - The supply of hot food or drink from any premises between 23:00 hours and 05:00 hours.
- 1.3 These licensable activities are covered through application to the Royal Borough of Greenwich for a licence to undertake them. These include applications for new premises licences; club premises certificates; variations to these types of permission; temporary events; and reviews of licences and /or certificates.
- 1.4 The Royal Borough's intention is that local people, their families and visitors are provided with opportunities for enjoyable, pleasurable and safe experiences. It is paramount that these experiences are safe, without fear of violence, intimidation or disorder whilst on, arriving at or leaving licenced premises. The Policy highlights that local residents should not be unreasonably disturbed, whether in the street or at home, by activities or customers within, or linked to, licenced premises.

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<sup>1</sup>Inclusive of "relevant entertainment" as defined under Sch. 8 of the Local Government (Miscellaneous Provisions) Act 1982.

- 1.5 The Policy aims to provide a necessary balance between providing a platform upon which responsible business operators may contribute towards a thriving business and late-night economy, especially in those areas undergoing substantial regeneration, whilst at the same time ensuring that the quality of life of those who live and work in Royal Greenwich is protected and enhanced through the licensing system. These objectives are achievable if all parties concerned work together.
- 1.6 The Royal Borough of Greenwich Statement of Licensing Policy is paramount in the administration and enforcement of the Licensing Act 2003, in a time of Central Government austerity measures and diminishing Police resources. The Royal Borough note that the current statutory licensing fees do not cover the cost of the administration of the licensing regime in aiming to promote the licensing objectives. The Royal Borough supports the concept of locally-set fee levels so that the local authority no longer subsidises the licenced trade in this regard.
- 1.7 The Royal Borough of Greenwich Statement of Licensing Policy aims:
- To inform licence applicants of the parameters under which the Licensing Authority will make licence decisions and ensure applicants are clear about the ways licenced premises are expected to operate within an area.
  - To reinforce to elected Members of the Licensing Committee, Sub-Committees, and officers with delegated authority, the boundaries and power of the Licensing Authority when making licence decisions.
  - To support Police and the Licensing Authority in their efforts to manage and act against those premises that are causing problems, as well as supporting businesses to be responsible premises.
  - To encourage businesses to adopt practices that reflect the needs of the local community.
- 1.8 This Policy will remain valid for a period of up to five years from the date of issue, but may be subject to review at any time following appropriate consultation.
- 1.9 The Royal Borough has received evidence that the configuration of the Cumulative Impact Zones (CIZs) have changed in the subsequent five years since the consultation of the 2016 policy. These zones have been redrawn and Eltham Town Centre, Herbert Road (off Plumstead Common Road, London SE18), and The O2 and its surrounding environs on Greenwich Peninsula, are included in the Cumulative Impact Zones.

## **2 Licensing Objectives**

- 2.1 The Royal Borough recognises the great variety of premises for which licences may be sought. These will include theatres, cinemas, restaurants, pubs, nightclubs, cafes, takeaways, shops, community halls and schools. The Royal Borough has a duty under the Act to carry out its functions with a view to promoting the licensing objectives. The licensing objectives are:
- the prevention of crime and disorder;
  - public safety;
  - the prevention of public nuisance; and
  - the protection of children from harm.

Each objective has equal importance.

- 2.2 It is recognised that the licensing function is only one means of securing delivery of the above objectives and should not be seen as a means for solving all problems within the community. The Royal Borough will therefore continue to work in partnership with its neighbouring authorities, the Police, local businesses and local people towards the promotion of the objectives.
- 2.3 Applicants are required by the Act to submit an operating schedule as part of the application process. The Royal Borough will expect applicants to address the licensing objectives in their operating schedule having regard to the type of premises, the licensable activities proposed, the location of the premises, and the potential impact of the premises operation on the local community.
- 2.4 Applicants will be encouraged to make themselves aware of any relevant planning and transportation policies, tourism and cultural strategies, or local crime prevention strategies, and to have taken these into account, where appropriate, when formulating their operating schedule.
- 2.5 Where the Royal Borough receives information that illegal activities may be taking place in any premises, it will pass on this information to the Police or other enforcement agencies.

### **3 Coronavirus Covid-19 (or similar) Pandemic**

- 3.1 On 23 March 2020, the Government closed non-essential premises in an attempt to reduce the spread of the Coronavirus Covid-19. The premises that were required to close included restaurants and public houses, cinemas, theatres and nightclubs, wine bars and other food and drinks establishments, including areas within hotels and members' clubs, such as dining rooms. The exceptions to closure were food delivery and takeaway establishments where the food is consumed off the premises, and premises with permission to sell off-sales of alcohol.
- 3.2 On the 4 July 2020, with the easing of restrictions, restaurants, public houses, members clubs, cinemas and hotels were allowed to open. In conjunction with the reopening of these premises, in order to allow premises to operate within a social distancing environment, the Government brought in the Business and Planning Act 2020.
- This Act provides for premises with an on-sales licence to automatically provide off-sales whilst the premises is open for on-sales, up until 23.00 hours. Provided there has been no "disqualifying event" in the last 3 years, such as off-sales refused at an earlier hearing, or specifically removed on review or by variation. Any new permission for off-sales do not apply to times when the premises licence does not allow sales of alcohol for consumption in outdoor areas of the premises.
  - The Act provides for the suspension of conditions for premises authorised for on and off-sales, for any conditions that have the effect of restricting the hours of off-sales to those less than for on-sales, up to 23.00 hours, or prevent sales in open containers or deliveries to work or residential addresses.
  - These exemptions are to stay into force until 30 September 2021.
- 3.3 If there are problems of crime and disorder, public nuisance, public safety or the protection of children from harm, arising from the how the premises operates using the new permission, any responsible authority, including the police or environmental health, could apply for a new off-

sales review. The off-sales review process is modelled on the existing review process. In the event that an off-sales review is triggered, it will only relate to off-sales authorised by virtue of these provisions, or conditions which have effect by virtue of these provisions. It cannot be used to revoke the existing licence or modify pre-existing licence conditions.

- 3.4 Along with these restrictions, Government issued advice on social distancing. Public Health England recommend people keep a two-metre separation, which may be reduced to one metre, if there are mitigation measures in place, to reduce the spread of infection, as the risk of infection increases the closer people are to each other.
- 3.5 Licenced premises that are permitted to operate during the period of closure, and those that are permitted to open once the restrictions are eased, will have to update their policies in light of Covid-19, such as admission and dispersal; drugs and toilet checks and cleaning protocols; security; avoiding the overcrowding of areas used regularly like corridors, toilets and confined spaces; controlling queues, and ensuring two-metre markers and signage to this effect are in place. Consideration should also be given to customer guidance, encouraging customers to email, use the website or bespoke apps when ordering, or telephoning ahead to reserve seating, and the use of remote payment processes.
- 3.6 In any emergency, pandemic or infectious disease outbreak situation, such as Coronavirus (Covid-19), or other emergency circumstances, all holders of premises licences and club premises certificates shall implement measures ensuring the safety of all persons accessing their premises, specifically:
- Employees, contractors, visitors, customers or any other persons shall maintain a safe distance from any other person;
  - Suitable and sufficient risk assessments relating to all activities of premises operation, applying the hierarchy of controls principle, would have been carried out and are being followed;
  - All staff should be briefed that if they or someone in their household have Coronavirus symptoms, they must not come into work, but need to self-isolate for a minimum of 14 days. An easy system for sick staff to self-sign-off should be implement and used;
  - The frequency of cleaning surfaces that are regularly touched by many people, such as door handles, should be increased using a cleaning agent/disinfectant effective against Coronavirus. This should be documented in a formal cleaning schedule.
  - A Control of Substances Hazardous to Health (COSHH) Risk Assessment in relation to any new disinfectant should be carried out. This should include training, information, supervision, the use of relevant PPE by the employees, the residual effects of the disinfectant on hard surfaces, and other associated matters. This should be documented in the risk assessment.
  - A sufficient number of hand-washing and hand-sanitising stations should be provided throughout the premises.
  - A sufficient number of hand towel dispensers should be provided.
  - Other premises' safety concerns, such as pest control, gas safety, and Legionella management, should also be properly addressed;
  - If carrying out any new operation, for example providing a takeaway service, this should be properly considered and documented in the risk assessments.

- 3.7 Guidance regarding measures to be considered in the promotion of the public safety licensing objective, including the actions you may take to aid prevention of the spread of Coronavirus, are set out in the suite of conditions listed in **Appendix B**.

## **4 Licence Conditions**

- 4.1 The Royal Borough maintains that licensing is about the control of licenced premises, qualifying clubs and temporary events within the terms of the Act. Any conditions attached to licences will be focused on matters that are within the control of individual licensees and must be appropriate for the promotion of the licensing objectives.
- 4.2 These conditions will relate to the premises and other places being used for licensable activities, and the impact of those activities in the near vicinity of the premises. In this regard, the Royal Borough will primarily focus on the impact, or reasonably anticipated impact, of any activities taking place at the licenced premises on those living, working or engaged in normal activity in the area concerned.
- 4.3 Where the Royal Borough's discretion is engaged as a result of relevant representations, tailored and proportionate conditions may be imposed on a licence to address the individual licensing objectives.
- 4.4 In assessing the methods to be used by licence applicants to meet the licensing objectives and in consideration of representations made, regard will be taken of relevant industry standards, appropriate guidance, and local policies. These will inform the conditions which will be applied to the licence.
- 4.5 In order to avoid duplication with other statutory regimes as far as possible, the Royal Borough will not attach conditions on a licence unless they are considered appropriate for the promotion of the licensing objectives. A list of non-exhaustive conditions for consideration appear in Appendices A to G. Whilst these are not standard conditions, they demonstrate good practice and may be used in preference to poorly worded conditions offered in the operating schedules of submitted applications.

### **a. The Prevention of Crime and Disorder**

- 4.6 The Royal Borough recognises that well-run premises can make a valuable, positive contribution to the local community through the local economy, tourism and cultural development. However, because of the link between alcohol consumption and crime and disorder, especially those offering late night entertainment / refreshment for large numbers of people, premises that are not properly managed and controlled can become a serious source anti-social behaviour, such as violence, sexual assault, domestic violence, public disorder, noise, and street drinking.
- 4.7 In addition to the requirement to promote the licensing objectives, the Royal Borough recognises its duty under Section 17 of the Crime and Disorder Act 1998 and, as such, will work with the Police, its own Safer Spaces Team, and other responsible authorities to deter and prevent crime and disorder within the Royal Borough.



- 4.8 The Royal Borough will expect applicants to address in their operating schedule how the operation of the premises will satisfactorily address crime and disorder issues ranging from the design of the premises through to the daily operation of the business, whilst promoting the prevention of crime and disorder objective. For pubs, bars and premises with facilities for music and dancing (e.g. nightclubs), a specific assessment may be needed of how the risks of violence and crime in the premises and the vicinity will be managed.
- 4.9 In decisions relating to applications in respect of general purpose grocery stores, the Royal Borough may impose a limit on the shelf-space available for the display of alcohol.
- 4.10 The Royal Borough will require the licence holder to indicate what steps will be put in place to control the excessive consumption of alcohol and drunkenness on the relevant premises, in order to reduce the risk of anti-social behaviour occurring elsewhere after customers have left the premises.
- 4.11 The Police and the Royal Borough's Safer Spaces Service are the main source of advice on crime and disorder. Applicants are recommended to seek advice on crime prevention from Greenwich Police before making a formal application. The Licensing Police can be contacted at [SEMailbox.licensinggreenwich@met.police.uk](mailto:SEMailbox.licensinggreenwich@met.police.uk).
- 4.12 These conditions may, for example, include items relating to management systems, training, drugs policies, search procedures, entry policies, physical security, door supervisors, bottle bans, drinks containers, smoking area capacity limits, CCTV, restricting drinking areas, premises capacity limits, age verification systems such as Challenge 25, crime prevention notices, and signage.
- 4.13 The Royal Borough supports local Pubwatch schemes and similar initiatives such as "Town Watch". Such schemes are demonstrations of good practice by the licenced trade. Licence holders are encouraged to participate in local groups to help promote the licensing objectives. Where appropriate, the Royal Borough will offer advice and assistance to such initiatives and where invited to participate will endeavour to do so.
- 4.14 Applicants and licence holders are expected to be aware of the potential for drug misuse on their premises and, where this is a risk, to take appropriate advice from the Police and/or Public Health Drugs and Alcohol Commissioner, in order to introduce measures that can mitigate this risk. Free online resources are also available from the *Safer Nightlife* website – [www.safernightlife.info](http://www.safernightlife.info) – which includes advice, guidance and training literature, along with sample log books and information on developing a strong drugs policy.
- 4.15 In the case of licence applications for 'off-sales', the Royal Borough may limit the alcoholic strength of beers, lagers and ciders for sale to under 6.5% ABV, excluding the sale of agreed premium alcoholic beverages.
- 4.16 The prevention of crime includes the prevention of immigration crime, including illegal working in licenced premises. The Royal Borough will work with Home Office Immigration Enforcement, as well as the Police, in respect of these matters. Where appropriate, the Royal Borough will consider imposing conditions directed at ensuring the prevention of illegal working in licenced

premises, such as licence holders being required to undertake right to work checks on all staff and the retention on the premises of a copy of any document checked as part of a right to work check to be produced on inspection.

- 4.17 The Royal Borough recommend premises put in place measures to reduce violence, intimidation and harassment of any nature for staff and customers. Resources on this subject can be found through the Safer Sounds Partnership, which works in partnership with the Metropolitan Police, local authorities and the Greater London Authority (GLA) to promote consistency of operations, sharing of best practice, bespoke training, and facilitating information sharing, whilst supporting venues, promoters and artists to create safer events for all. The Partnership has created an Event Operations Plan, in partnership with the Police and venues, to:
- Assist licence holders in effective management of events in their premises;
  - Enable licence holders to identify risk and mitigate that risk in relation to events in their premises;
  - Help licence holders in promoting the licensing objectives;
  - Enable licence holders to use best practice to run a safer event(s).
- 4.18 Those premises that may require SIA (Security Industry Authority) door supervisors should give consideration to employing them through an operator that is part of the SIA's Approved Contractor Scheme (ACS). The objective of the ACS is to raise industry performance standards and ensure its members are the best providers of private security services in the UK.
- 4.19 The Royal Borough of Greenwich recommends that premises consider signing up to the Women's Safety Charter, which sends a clear message to anyone who lives, works, studies or visits the borough that the safety of all women and girls is a priority. It also helps women and girls feel safer in spaces accessed by the public: [https://www.royalgreenwich.gov.uk/info/200202/community\\_safety/2023/sign\\_up\\_for\\_the\\_womens\\_safety\\_charter](https://www.royalgreenwich.gov.uk/info/200202/community_safety/2023/sign_up_for_the_womens_safety_charter).
- 4.20 Premises licences will undergo review, where the premises in question is suspected or proven to be the source of crime and disorder. Conditions which should be considered to ensure prevention of crime and disorder have been listed in **Appendix A**.

#### **b. Public Safety**

- 4.21 The Royal Borough expects all holders of premises licences and club premises certificates to implement measures ensuring the safety of all persons using their premises. Physical safety measures may include, but are not necessarily limited to, the prevention of accidents and injuries and other immediate types of harm, such as loss of consciousness or alcohol poisoning.
- 4.22 The safety of persons using the premises relates not only to safety in respect of the physical state of the premises, which includes the curtilage and means of access and egress, but also safety in respect of activities taking place within them, such as the use of pyrotechnics or other special effects.
- 4.23 Public safety may also extend to matters outside the confines of the premises to include public safety in the vicinity of the premises. This may include other areas, such as pavements, persons



queuing to gain access, or, in the case of a convenience store at a petrol station, activities such as persons drinking on the garage forecourt.

- 4.24 The Royal Borough expects applicants in their operating schedules for premises licences and club premises certificates to consider measures ensuring the safety of the public, not only when they are present within the premises, but also their safety within the environs of the premises on arrival and departure. To promote the public safety licensing objective, these measures will be converted into enforceable conditions.
- 4.25 The Royal Borough recognises that the measures for individual premises will depend on a range of factors, including the nature and style of the venue, the types of activities being conducted, the location of the premises, the anticipated clientele, and the competency of management. Measures to be considered may include:
- Fire safety;
  - Provision of appropriate access for emergency services, such as ambulance vehicles;
  - Effective communication with local authorities and emergency services, for example communications networks with the Metropolitan Police and signing up for local incident alerts;
  - Having a sufficient number of adequately trained first aiders at the premises and appropriate number of first aid kits;
  - Ensuring the safety of people when leaving the premises, for example through the provision of information on late-night transportation;
  - Provision of sufficient external lighting to enable the public to exit the premises safely;
  - Arranging regular and timely waste disposal, particularly that of glass bottles;
  - Implementing appropriate maximum capacity limits of the premises;
  - Using the CCTV inside the premises and within the immediate vicinity of it.
- 4.26 The Royal Borough recognises that conditions relating to public safety need to be relevant and proportionate to the circumstances of any individual premises or club premises. The conditions should not duplicate any other legal requirements. The attachment of conditions to the premises licences or club premises certificates will not in any way relieve the employers of their statutory duties to comply with the requirements of other legislation, such as the Health & Safety at Work Etc. Act 1974, associated regulations, and especially the requirements under the Management of Health & Safety at Work Regulations 1999 and the Regulatory Reform (Fire Safety) Order 2005, to undertake risk assessments.
- 4.27 The Royal Borough may impose a 'safe capacity' limit on relevant premises, where necessary, for the promotion of public safety or the prevention of disorder. This is because in overcrowded venues the risks of crowds becoming frustrated and hostile can increase and therefore compromise public safety. This would only occur in cases where no safe capacity had been imposed through other legislation and where a Responsible Authority may consider it necessary to set a new capacity limit. In these circumstances, where relevant representations are made by Responsible Authorities, conditions, which would apply at any material time when the licensable activities are taking place, may be attached to premises licences and club premises certificates.

- 4.28 For guidance on conditions that the Royal Borough will expect an applicant to demonstrate in their operating schedule, specifically that suitable and sufficient steps have been taken to ensure the licensing objective of the public safety, **Appendix B** provides further conditions that should be considered.

**c. The Prevention of Public Nuisance**

- 4.29 The Royal Borough will require any applicant to demonstrate within their operating schedule how they intend to prevent public nuisance arising and, equally, to prevent nuisance to ensure that the prevention of public nuisance licensing objective in particular, and the licensing objectives in general, are met. Public nuisance includes noise caused by customers arriving at and/or leaving a premises, noise created whilst they are within a premises, general anti-social behaviour, and issues such as smoke, odour, litter, light, fly-posting, and obstruction of the highway. These examples are not exhaustive and applicants should demonstrate within their application how all potential public nuisance issues relevant to their premises will be mitigated. Conditions which should be considered, to ensure the prevention of public nuisance, are listed in **Appendix C**.
- 4.30 Noise nuisance can arise from a range of sources such as entertainment noise escaping from premises, loud voices from customers standing outside, the disposal of waste in refuse or recycling bins, car doors slamming, taxi horns sounding as patrons are picked up, and the general noise of people arriving and leaving. This is particularly intrusive at night when background noise levels are lower and residents are trying to sleep, and so it is important that applicants can demonstrate how they will effectively manage the exit and dispersal of their customers. Consideration should be given to the following:
- Installing acoustic lobbies to all entrances/exits;
  - Installing speakers on acoustic mounts;
  - The use of appropriate noise limiters on amplification equipment used at the premises, to ensure that noise or vibration does not emanate from the premises so as to cause a nuisance to nearby residential properties;
  - Keeping all doors (except for access/egress) and windows at the premises closed whilst entertainment is taking place;
  - Prominently displaying clear and legible notices at all exits requesting the public to respect the needs of local residents and to leave the premises and the area quietly;
  - That the placing of refuse and recycling into receptacles outside the premises should only take place between 08:00 hours and 23:00 hours to minimise the disturbance to nearby residential properties;
  - Limiting the number of customers smoking outside the premises at any one time.
- 4.31 Procedures must be put in place to manage the behaviour of customers insofar as preventing it from becoming a public nuisance. These measures may include management of patrons when they arrive and leave the premises; the placing of signage reminding patrons to arrive and leave quietly, and to have respect for local residents; arranging a dedicated taxi service to assist the quick dispersal of customers away from the premises; and when drinking outside is permitted (such as in a beer garden or on a forecourt), the implementation of workable procedures to

reduce/remove the potential of disturbance to neighbours. Again, these examples are not exhaustive.

- 4.32 Licence applicants for premises that are contained within residential blocks need to ensure that their application addresses how the licence, if granted, would not negatively impact on the residents within the block.
- 4.33 Premises that provide food and/or drink for consumption off the premises could create public nuisance in the form of customers causing litter (i.e. food wrappings and drink containers) in the vicinity of the premises and the wider area. Applicants for licences allowing the provision of late night refreshment, together with the sale of alcohol for consumption off the premises, are recommended to consider the problems that litter causes through their operation and what steps they will take to prevent such nuisance. The steps they could take (and include in the operating schedule section of their application form) include, but are not limited to:
- The provision of waste receptacles directly outside the premises;
  - Notices on display asking customers to dispose of their litter and refuse responsibly; and,
  - The licence holder arranging for the clearing of litter in the immediate vicinity of their premises at regular intervals during licenced hours or, at a minimum, at the close of business each day.
- 4.34 The trading hours during which licensable activities are permitted at premises by the conditions of a premises licence or a club premises certificate, are set for the prevention of public nuisance. Where premises are in a predominately residential area, the potential for public nuisance is greater. Restrictions may be necessary on the times when certain licensable activities take place, even though the premises may be open to the public at such times. For example, the playing of recorded music after 23:00 hours might be prohibited, even though other licensable activities are permitted to continue. Applicants should consider factoring a suitable “drinking up” time for alcohol and “winding down” time for regulated entertainment into their operating hours. Where an external area is permitted to have licenced activity, for example a beer garden or open forecourt, it may be appropriate to cease that activity earlier than the terminal hour for the rest of the premises.
- 4.35 In certain premises where existing legislation does not provide adequately for the prevention of public nuisance, consideration should be given to conditions that ensure the flashing of particularly bright lights on, or outside, licenced premises do not cause a nuisance to nearby properties (light pollution). Such conditions may include restrictions on the number, luminosity, and/or alignment of lights.
- 4.36 The Royal Borough expects applicants to outline in the operating schedule of their licence application measures so as to avoid disturbance to noise-sensitive premises from vehicles arriving, departing and parking for an event, as follows:
- Guidance to patrons on routes to take as they depart, to cause least disturbance to noise-sensitive premises;
  - Guidance to patrons via websites to travel by public transport;
  - Guidance to staff on their responsibilities to minimise noise from patrons as they arrive at and depart from the premises;

- Arrangements for the calling of taxis, minicabs, cars or limousines from within the premises, and for the collection of patrons by arrangement;
- Arrangements with dedicated taxi, minicab, car or limousine companies to collect patrons in an agreed manner so as to minimise disturbance;
- Arrangements for staff and patron parking.

4.37 Licence holders are expected to adhere to the prevention of public nuisance through their licensable activities and demonstrate ways in which public nuisances, which result from the premises or its users, will be mitigated against. Conditions which should be considered, to ensure the prevention of public nuisance, have been listed in **Appendix C**.

#### **d. *The Protection of Children from Harm***

4.38 The Royal Borough will not impose any condition which specifically requires access for children to be provided at any premises. Access by children to all types of premises will not be limited in any way, unless it is considered necessary to do so for the prevention of harm or would compromise another licensing objective. Although the Royal Borough is sympathetic to applications which create additional appropriate child and family friendly venues, the Royal Borough will consider limiting access to children if there is a risk of moral, psychological and/or physical harm posed by their presence. Licence applicants are expected to determine appropriate times for children to be present on the premises. Where no restriction or limitation is imposed, the issue of access will remain a matter for the discretion of the individual licensee or club. Each licence application will be judged on an individual basis.

4.39 The Royal Borough recognises the widespread problem with compliance of the law regarding the sale of alcohol to those under the age of 18. The Royal Borough shares the Government's concern over the consumption of alcohol by children. Trading Standards and the Police strongly support the use of 'Challenge 25' in all licenced premises as an aid to preventing underage sales of alcohol. Trading Standards and the Police are also available to give advice around preventing underage sales.

4.40 It is intended that a complete ban of children from premises shall be rare. The Royal Borough would expect greater concern be taken by applicants and licence holders, within operating schedules and business policies, for the hours where those under the age of 16 are permitted access to a premises. Where a licenced premises engages in events where the customers will primarily be 16, 17 or 18 years in age, the Royal Borough would encourage licensees to inform the Responsible Authorities in advance so that appropriate, specific and relevant advice can be provided.

4.41 In the case of premises that are used for film exhibitions, conditions will be imposed restricting access only to those who meet the required age limit in line with any certificate granted by the British Board of Film Classification or, in specific cases, a certificate given to the film by the Royal Borough. Details of the process for the classification and re-classification of films may be found on the Royal Borough of Greenwich website at: <https://www.royalgreenwich.gov.uk/info/200299/alcohol-and-entertainment-licences/793/film-classification> .

- 4.42 Where a large number of children are likely to be present on any licenced premises, for example a children's show, pantomime or any other child-friendly venture, then additional conditions may be imposed, including requiring the presence of an appropriate number of adult staff; adequate and up-to-date professional training around key safeguarding matters for licenced premises; and a record of those holding a relevant and contemporary DBS certificate (or equivalent criminal record check recognised in the UK) to ensure public safety and protection from harm. Anyone intending to provide staff for the supervision of activities of children under 16 shall be required to carry out criminal record checks on all such staff. A register of these checks and any training undertaken shall be kept on the premises and available for inspection by authorised officers of the Royal Borough or Police officers.
- 4.43 A young person of compulsory school-age must have a Child Performance Licence and be accompanied by a parent, chaperone or matron approved by the Royal Borough to perform in licenced premises. Information regarding performance licences and chaperone licences can be found on the Royal Borough of Greenwich website at: [https://www.royalgreenwich.gov.uk/info/200296/child\\_employment\\_licences/788/apply\\_for\\_a\\_child\\_performance\\_licence](https://www.royalgreenwich.gov.uk/info/200296/child_employment_licences/788/apply_for_a_child_performance_licence).
- 4.44 The Royal Borough recognises the national concern with the association of specific premises, hotels and late-night refreshment venues in particular as the source of, and contributing to, the sexual and criminal exploitation of children. As such, it is expected that premises provide relevant training on CSE, CCE and other contemporary safeguarding concerns. Premises are expected to offer suitable conditions, training and support for staff to observe, record and pass on any safeguarding concerns, including child sexual exploitation (CSE) or child criminal exploitation (CCE), to the relevant authorities. The Royal Greenwich licensing team and the Police are also available to offer advice around safeguarding issues.
- 4.45 The Royal Borough strongly advises that all licenced premises which permit any person under the age of 18 on to their premises at any time undertake appropriate and regular training around key safeguarding issues relative to their premises type. It is advised that safeguarding training is provided to all staff on a regular basis and is recorded as part of a training record. Royal Greenwich licensing team, the Child Safeguarding team, and the Police are available to offer advice around safeguarding training.
- 4.46 The Royal Borough expects all staff within licenced premises to look out for any evidence of the premises being used as a base for child sexual exploitation or child criminal exploitation, and to report any such suspicions to the Police by calling '101', or Royal Greenwich Multi-Agency Safeguarding Hub (MASH) Referral Team on 020 8921 3172, or by email to [mash-referrals@royalgreenwich.gov.uk](mailto:mash-referrals@royalgreenwich.gov.uk) as a matter of urgency and noting details within the premises incident log. If any child or other person appears to be in immediate danger, it is expected that staff report to the Police on 999 and complete a witness statement of the event. More information around reporting child protection concerns can be found on the Royal Greenwich website at: [https://www.royalgreenwich.gov.uk/info/200237/family\\_support\\_and\\_safeguarding\\_children/956/report\\_your\\_concerns\\_about\\_a\\_child](https://www.royalgreenwich.gov.uk/info/200237/family_support_and_safeguarding_children/956/report_your_concerns_about_a_child).
- 4.47 The Children and Social Work Act 2017 places duties on the Police, clinical commissioning groups and the local authority to make arrangements to work together and with other partners locally to safeguard and promote the welfare of children in their area. The licensing team regularly



attends the Strategic Multi-Agency Child Exploitation Group (SMACE), a partnership group which is responsible for working collaboratively to ensure a strategic response to child exploitation, including child sexual exploitation, criminal exploitation, missing children, county lines, gangs and modern-day slavery. The group's remit is to share and analyse information from partner agencies in order to identify trends and emerging issues, and agree co-ordinated actions by partner agencies to tackle these issues and trends.

- 4.48 Relevant information relating to licenced premises of concern, and pertinent data regarding those young people who are at risk when accessing those premises, is be shared and reviewed as permitted within the stipulations of the General Data Protection Regulation (GDPR) and Data Protection Act 2018; the Caldicott Principles; Working Together to Safeguard Children (DfE 2018); and Information Sharing: Advice for practitioners providing safeguarding services (DfE 2018). Risk assessments, plans and interventions are aligned across the partnership and are agile in response to rapid changing situations. All work is underpinned by robust and timely information sharing and outcome-focussed plans to reduce risk.
- 4.49 The Royal Borough will expect applicants to demonstrate in their operating schedule that suitable and sufficient steps are to be taken to ensure the licensing objective of the protection of children from harm. In addition to mandatory conditions, **Appendix D** provides further conditions which should be considered.

## 5 Public Health

- 5.1 Health bodies were made Responsible Authorities under the Licensing Act 2003 in April 2012. Although public health is not a licensing objective, health-related data can be used to plot CIZs and to identify the potential impact of premises on crime and disorder, public safety, public nuisance, and/or the protection of children.
- 5.2 Alcohol is a key risk factor for poor health in Royal Greenwich, particularly in areas of deprivation. Over a fifth of Greenwich residents live in areas ranked the most deprived in England. Evidence<sup>2</sup> demonstrates alcohol has a disproportionate effect on the health and wellbeing of the poorest residents, with those in the most deprived areas of the borough being more than four times as likely to die from alcohol related conditions. This evidence is consistent with international research on alcohol impacts on varying socioeconomic groups, which is known as the Alcohol Harms Paradox<sup>3</sup>. Over consumption of alcohol can lead to dependence. Alcohol is a causal factor in more than 60 medical conditions, including: mouth, throat, stomach, liver and breast cancers, high blood pressure, cirrhosis of the liver, and depression. Alcohol is also associated with many socio-economic issues, including emotional and relationship problems, poor mental health, domestic violence, violent and sexual offences, antisocial behaviour, and loss of productivity (increase in sick days).
- 5.3 The most recent evidence for Royal Greenwich, suggest that 54,000 adults (18%) drink above government guidelines (*14 units per week for adults*) and national evidence suggests an estimated 77,000 adults (27%) in Greenwich binge drink (*6 or more units of alcohol in one*

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<sup>2</sup>[ONS alcohol specific deaths in the UK](#)

<sup>3</sup>[BMC How alcohol may disproportionately impact health in deprived individuals](#)

session). These rates are typical for an outer London Borough, however around 2,981 adults may be moderately or severely dependent<sup>4</sup> and require specialist services, a threefold increase since 2012. National survey data shows that drinking is highest among people in late-middle age, with those aged 55-64 most likely to regularly exceed their weekly unit intake; the majority of these are men. Evidence from a public health roadshow 2019 demonstrated Eltham has the highest ratio of at-risk drinkers; 500 residents were tested in five borough locations. Those in Eltham self-reported the highest rates of alcohol consumption, with 10% identifying as dependent, 9% drinking at high risk, 44% drinking at increasing risk and just 37% drinking within public health guidelines.

- 5.4 This data does not provide insight to the 'hidden harm' of alcohol consumption amongst different cultural or ethnic communities. However, research with community groups and representatives in Greenwich in 2018 & 2019 identified that many are resistant to engage in health surveys, alcohol audits or treatment and support for reasons of shame or dishonour, only presenting with chronic or acute conditions in hospital, long after early interventions could have prevented such illness.
- 5.5 Alcohol has a significant impact on health services. There were 1,161 alcohol specific admissions to hospital in Greenwich in 2017/18 and a further 6,234 admissions for alcohol related conditions<sup>5</sup>. Nationally admission rates for alcohol related conditions have increased by 15% since 2008. Between 2017 and 2019 there were 1,848 alcohol related ambulance call outs in Greenwich, with 1,680 requiring conveyance to hospital, at an estimated cost of £450,000, this does not take account of additional costs associated with hospital treatment. The greatest burden on services is caused by large numbers of people drinking riskily but not dependently, rather than the relatively small number of people with alcohol dependence.
- 5.6 Alcohol is associated with several types of crime and disorder; national survey data suggests that overuse of alcohol is implicated in at least half of all violent crime. In 2016/17 in England and Wales, 12.4% of theft offences, 20.6% of criminal damage and 21.5% of hate crimes were alcohol-related.<sup>6</sup> Anti-social behaviour and violent crime, including sexual offences are concentrated in areas with a higher density of licenced premises (particularly Greenwich West, the O<sub>2</sub>, Woolwich, Plumstead and Eltham – see Fig 3, 4, 5 and 6 below). In 2014-2016 in England and Wales, alcohol-related violent incidents made up 67% of all violent incidents<sup>7</sup> which take place at the weekend and 68% of those which take place during the evening and night. Alcohol-related ambulance call-outs are also most common in these areas.
- 5.7 Chronic disease caused by alcohol is strongly associated with deprivation, with highest rates of alcohol-related hospital admissions in Charlton, Kidbrooke and Hornfair, Woolwich Riverside, Woolwich Common, Glyndon, Plumstead, and Abbey Wood (see Fig 2). There is no evidence that more deprived groups drink more alcohol, therefore this pattern is likely to relate to other contributory factors (such as poorer general health among more deprived groups).

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<sup>4</sup>[Gov.UK alcohol dependence prevalence rates 2017/18](#)

<sup>5</sup>[PHE England Local Alcohol Profile for England](#)

<sup>6</sup>[ONS Alcohol related incidents crime survey for England and Wales](#)

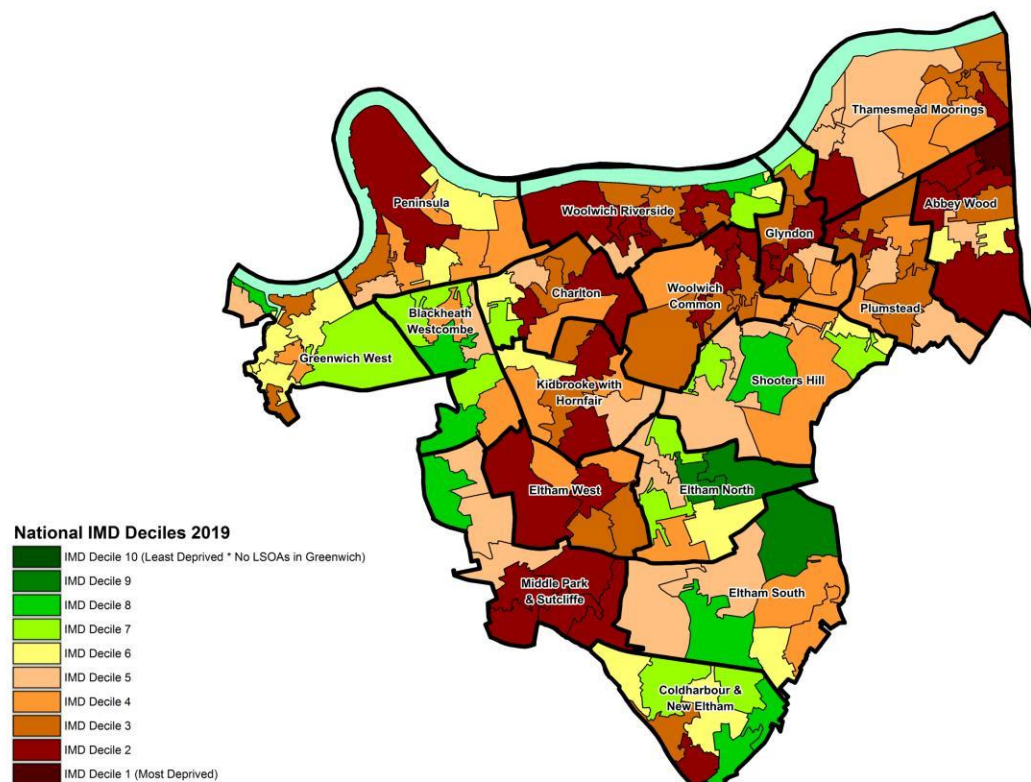
<sup>7</sup>[ONS Overview of violent crime and sexual offences](#)

- 5.8 Alcohol plays a major role in three of the four priorities in the Royal Greenwich Joint Health and Wellbeing Strategy 2019-2024<sup>8</sup>. These are Improving Mental Health, Improving Healthy Weight, and Live Well Greenwich, embedding the prevention approach, which are outlined below.
- 5.9 People with low mental wellbeing are more likely to drink harmfully. Alcohol causes or can contribute to mental health problems such as low mood, anxiety or depression, and people with mental health problems may use alcohol as a coping mechanism. Some people may experience a cycle between increasing alcohol use and decreasing mental wellbeing, often referred to as 'self-medication'. More than 60% of people in treatment for alcohol dependency report having a mental health condition.
- 5.10 While a causal link between drinking alcohol and obesity has not been proven, heavy drinkers often have higher rates of obesity. This may be due to the calories in alcoholic drinks or high food consumption associated with drinking. Binge drinking is strongly associated with weight gain more than frequent lower level drinking. The cumulative impact of alcohol and obesity on the liver appears to be greater than either risk factor alone. A higher level of obesity is also associated with deprivation. Therefore, deprived groups with higher levels of obesity are more likely to experience greater negative effects from alcohol. Additionally, there are some ethnic groups such as South Asian, African or Afro-Caribbean (in whom rates of diabetes can be three to six times greater than the general population), where alcohol may have an additive impact on long term health.
- 5.11 The Live Well Greenwich approach is multifactorial, tackling social isolation, encouraging healthier activities, healthier eating, and supporting people to engage in activity that improves their health and wellbeing, through building resilience and increasing awareness of health risks, including harmful and hazardous drinking.
- 5.12 The following maps show that chronic disease caused by alcohol (measured by hospital admissions) is higher in areas of deprivation, while the rate of alcohol-flagged offences, ASB and violent and sexual offences is highest in areas with the most licenced premises.

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<sup>8</sup>[Royal Greenwich Joint Health and Wellbeing Strategy 2019-2024](#)

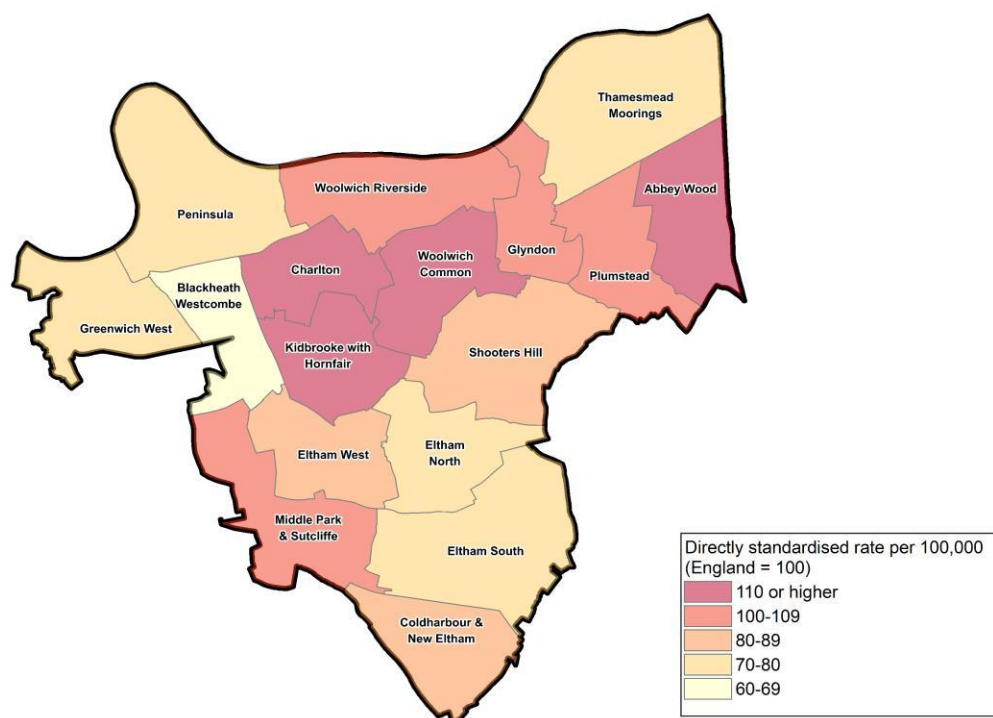




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**Fig 1: Indices of deprivation in Greenwich – 2019.**

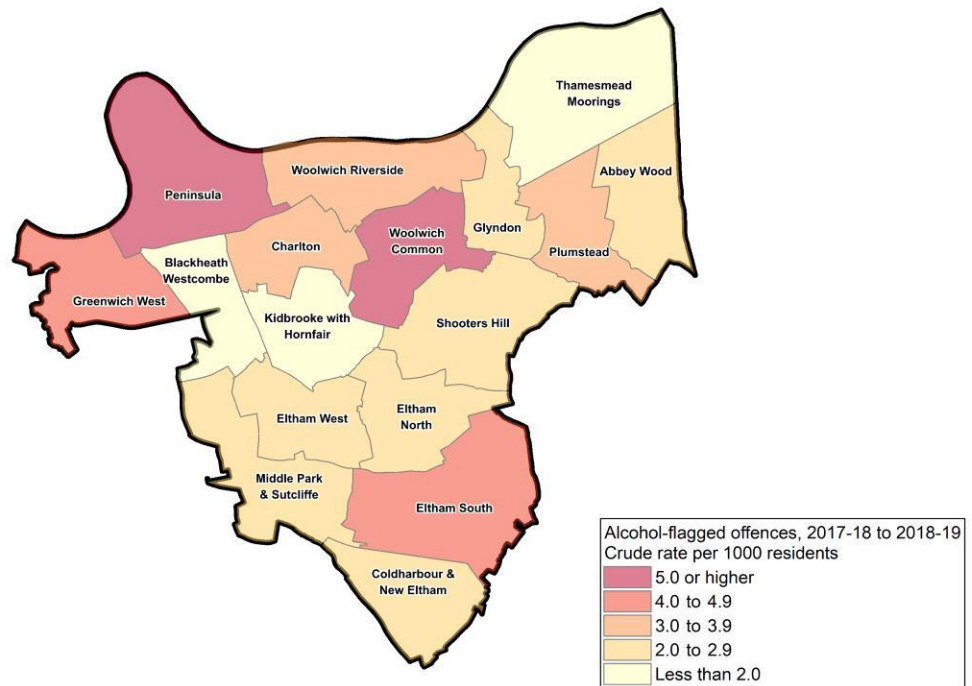
#### Hospital stays for alcohol-related harm (Broad definiton) in Greenwich - 2013/14 - 2017/18



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**Fig 2: Alcohol related hospital admissions – 2013/14-2017/18.**

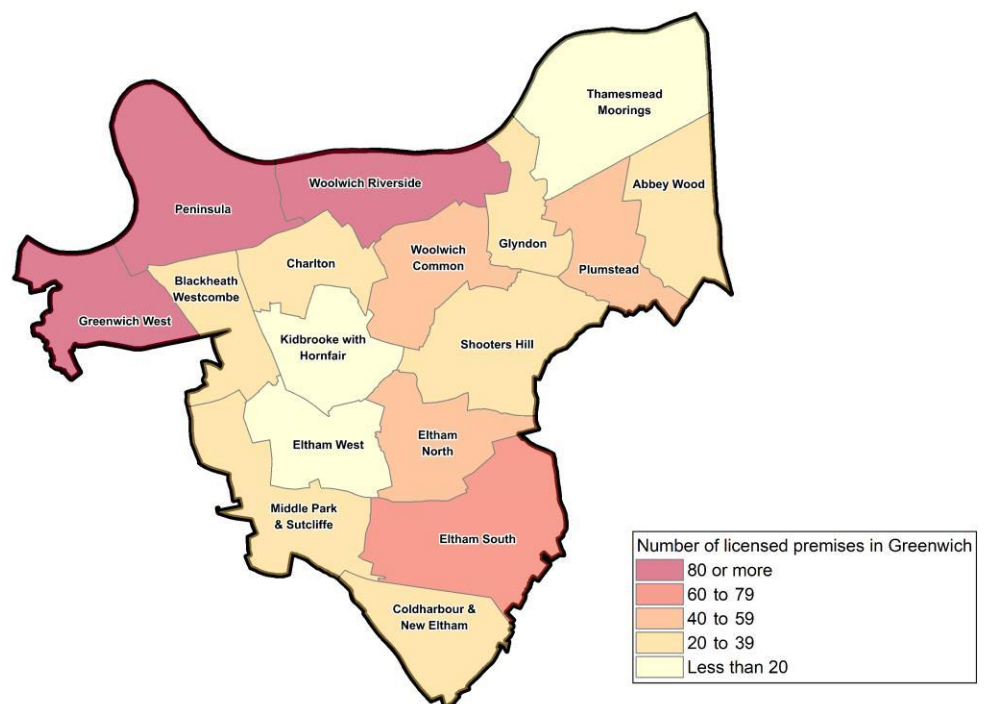
### Alcohol-flagged offences in Greenwich, 2017-18 to 2018-19



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**Fig 3:** Alcohol flagged offences in Greenwich – 2017/18- 2018/19.

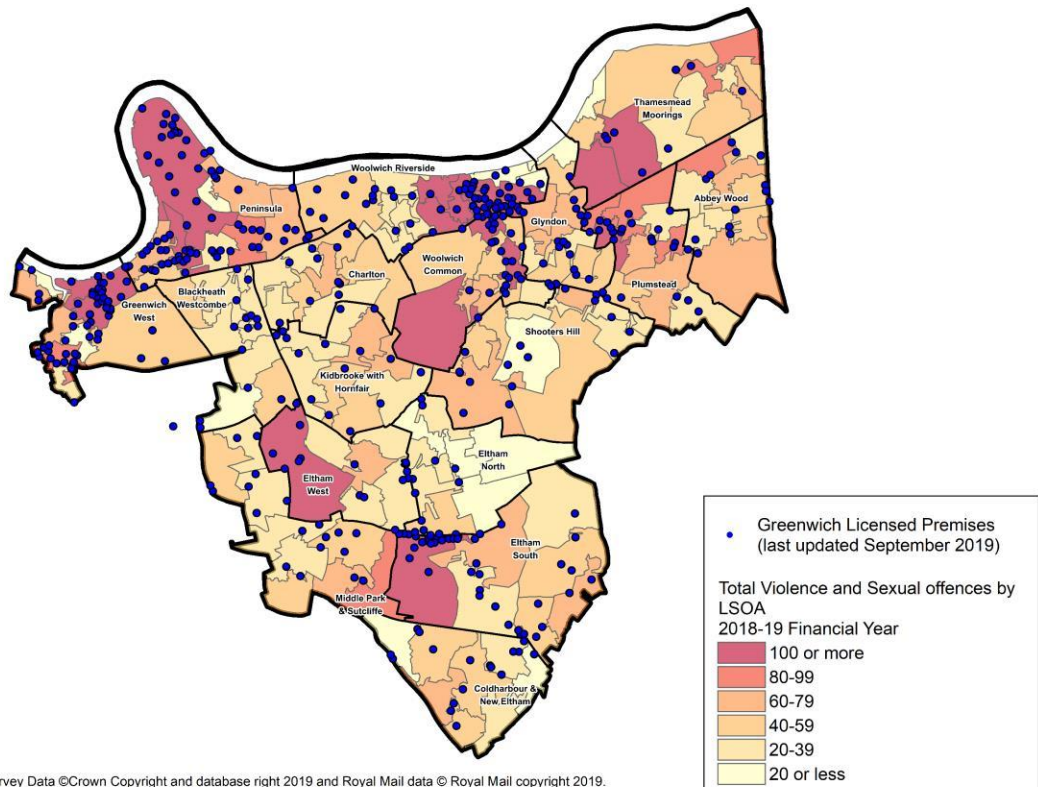
### Number of licensed premises in Greenwich recorded in September 2019



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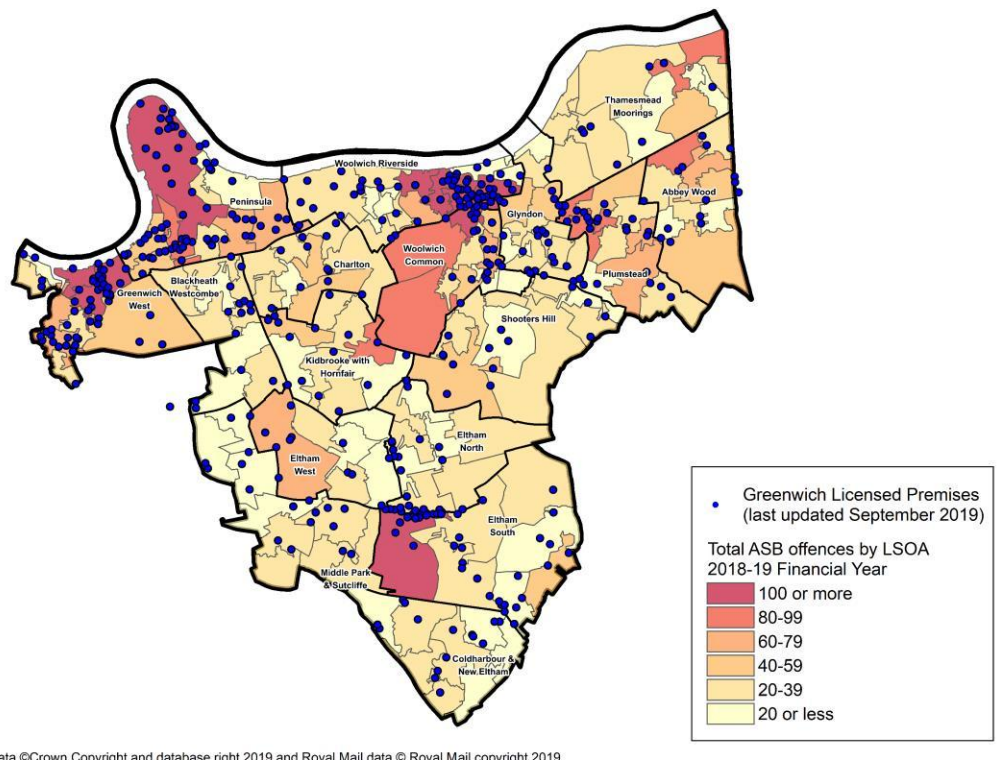
**Fig 4:** Density of licensed premises in Greenwich – 2019.

**Total number of Violence and Sexual offences in 2018-19 with licensed premises in Greenwich**



**Fig 5: Violence and sexual offences in Greenwich – 2018/19.**

**Total number of ASB offences in 2018-19 with licensed premises in Greenwich**



**Fig 6: ASB offences in Greenwich – 2019.**

All images contain ordnance survey data. Crown copyright and database right 2019.

## 6 Large Outdoor Events

- 6.1 Organisers of individual events requiring a Premises Licence need to be aware of the time limits imposed by the Licensing Act 2003. The Royal Borough encourages applicants to submit such applications a minimum of three calendar months before the proposed event start date to allow sufficient time for the consultation and the decision-making process. In relation to large outdoor events, such as major festivals and carnivals, applicants should establish a co-ordinating committee to ensure the strategic approach to the development of operating schedules. The purpose of this Committee is to ensure that the licence conditions do not conflict with each other, are easy to enforce and ensure compliance.
- 6.2 Organisers of individual large events with an anticipated audience of more than 1,000 people are expected to attend a licensing Safety Advisory Group (SAG) Meeting. In this meeting the organisers will have to set out their proposals on the management of the event with a view to promoting all licensing objectives. Depending on the nature of the event, invited members of the SAG include the Police, Environmental Health, Fire Brigade, Trading Standards, Building Control, the Highways Authority and the Ambulance Service. SAG officers will advise the event organiser of the criteria that they have to meet to ensure compliance with the licensing objectives.
- 6.3 The Royal Borough expects the organisers of outdoor events subject to a premises licence to address in their operating schedules the measures that they will take to ensure that the licensing objectives are met. The Royal Borough has produced an Outdoor Events Guide for organisers of such events. This Guide gives detailed and specific advice to applicants on issues that need to be addressed in their applications, such as requiring an event management plan, traffic management plan, noise management plan, sufficient stewarding, safe structures certification, and risk assessments. The Royal Borough recommends that organisers seek advice from the Licensing team before submitting their application.
- 6.4 A large temporary event, which cannot be authorised under a Temporary Event Notice due to the numbers of persons attending, will generally be licenced under a time-limited premises licence lasting for the duration of the event. Where regulated entertainment is included, the Royal Borough will set noise limits in line with the Noise Council's "Code of Practice on Environmental Noise Control at Concerts", and guidelines containing recommended noise control procedures.
- 6.5 To prevent public nuisance, the applicant is strongly advised to submit a draft Event Management Plan (EMP) prior to submitting a full application. The EMP should set out how the applicant intends to promote the prevention of public nuisance licensing objective. The consideration should also be given to the inclusion of the specific large temporary event conditions set out in ***Appendices E and F***.

## 7 Review & Consultation of Licensing Policy

- 7.1 On review of the policy statement, the Royal Borough will consult with:
- The Chief Officer of Police for the area;
  - The Fire Authority;



- The Public Health Body;
- Greenwich Safeguarding Children Partnership;
- Trading Standards;
- Environmental Health;
- Planning;
- Home Office Immigration Enforcement;
- Bodies representing local holders of premises licences;
- Bodies representing local holders of club premises certificates;
- Bodies representing local holders of personal licences;
- Bodies representing businesses and residents in the Borough;
- Bodies representing local faith groups;
- Neighbouring Local Authorities.

7.2 The Royal Borough will also seek to consult with local residents, licensees within the proposed saturation policy areas, Councillors, Members of Parliament (MPs), the Greater London Authority, and other bodies on matters relating to its Statement of Licensing Policy, as it considers appropriate.

7.3 The views of all consultees will be given proper weight when the policy is reviewed and will provide the opportunity to evaluate the effectiveness of the policy.

## **8 Submission & Consultation on Licensing Applications**

8.1 It is the responsibility of the applicant to ensure that they have permission to use the land or premises for which they are applying for a licence. Applicants who propose to hold licenced events on land operated by the Royal Borough should first seek permission / approval from the Royal Borough's Events team. Visit [www.royalgreenwich.gov.uk/info/200226/parks\\_and\\_open\\_spaces](http://www.royalgreenwich.gov.uk/info/200226/parks_and_open_spaces) or email [events@royalgreenwich.gov.uk](mailto:events@royalgreenwich.gov.uk).

8.2 The Royal Borough's licensing team are available to offer pre-application advice both in written form, and in person where appropriate. Visit [www.royalgreenwich.gov.uk/licensing](http://www.royalgreenwich.gov.uk/licensing).

8.3 An application for a premises licence may be made in writing or electronically, using the relevant licensing application form available on GOV.UK or the Royal Borough's own electronic facility (where available).

8.4 In the case of written applications, the applicant is required to send a copy of their application to the appropriate Responsible Authorities as defined within the Act. In the case of applications that are submitted entirely in an electronic form, the Royal Borough shall copy the application to the Responsible Authorities instead.

8.5 The date of submission will be deemed to be the day when a complete and valid application has been submitted to the Royal Borough, together with the correct application fee. The appropriate last date for representations will be calculated accordingly. However, this date may be extended if the applicant does not comply with any statutory requirements to advertise their application.

- 8.6 In addition to the statutory consultation requirements of the applicant, the Royal Borough may also carry out its own consultation by publishing online key information regarding applications and notifying interested parties that operate in the local area, such as residents' associations and groups. Direct mailing to residents and businesses within the immediate vicinity of the premises (typically 100 metres) may be conducted at the discretion of the Royal Borough for applications that it considers to be of particular public interest, such as for licence reviews.
- 8.7 It is open to any Responsible Authority or any "other person" as defined under the Act, which includes Councillors, to lodge representations during the set consultation period. There is no facility for the Royal Borough to accept late representations received outside of the consultation period.
- 8.8 A representation should relate to the likely effect of the grant or variation of the licence application on grounds relating to the promotion of at least one of the licensing objectives. A representation that fails to do so is not "relevant" for the purposes of the 2003 Act and will be rejected.
- 8.9 It is the Royal Borough's policy to determine on its merits whether any representations by other persons are frivolous or vexatious.
- 8.10 All representations must be received in writing at the Licensing Section's Office. This can be either by post, email or via our online register at <https://regulations.royalgreenwich.gov.uk>. Representations received by post must be signed. Representations received by any means must be dated, provide the grounds of the representation in full, and include the name and address of the person or body making the representation.
- 8.11 All representations are sent to the applicant in full, to enable them to respond. The name of those making representation, and whether they are in support or opposed to the application, is published within committee papers that are available through the Royal Borough's website as a matter of public record.
- 8.12 Representations cannot be accepted if they have been made anonymously, and all representations submitted to the Royal Borough shall only be accepted where they contain the full name and address of the person making it. However, in exceptional cases those making representation can request that the Royal Borough redact certain personal details from the applicant and/or in public documents, and explain why their details need to be withheld. All requests will be carefully considered, but anonymity cannot be guaranteed. If we are unable to agree to the request, the person making the representation will have the opportunity to withdraw their representation. Those making representation should note that because redacted representations may unduly affect the applicant's ability to respond to any issues raised therein, such representations may be treated with less weight than those where the identity of the persons submitting them is known.
- 8.13 Petitions will be considered as a relevant representation provided that all the signatories include their name, address, and signature. Every page of a petition must be clearly headed detailing on what grounds the representation is made. Details of the "lead petitioner" should be provided when the petition is submitted. Digital / online petitions will be permitted; however, a link to the

petition will not, in and of itself, be accepted as a representation. Instead, the lead petitioner must ensure that a copy of the petition (whether in a printed or electronic file format such as a .pdf) is submitted to the Royal Borough prior to the end of consultation. Digital / online petitions may substitute a valid email address in place of a signature.

- 8.14 Ward Councillors and MPs may make relevant representation in their own right, and subsequently attend and speak at a hearing of the Licensing Committee or Licensing Sub-Committee. Ward Councillors and MPs may also attend and speak at a hearing, if requested to do so, on behalf of any other person who has made relevant representation, provided written authorisation is given.
- 8.15 The Royal Borough, in its role as a Licensing Authority, will determine when it considers it appropriate to act in its capacity as a Responsible Authority. This may be in cases where early intervention is required, for example making a representation to the grant of a new application in a CIZ as it may add to cumulative impact of the licenced premises in that area. The Royal Borough as a Licensing Authority, in its role as a Responsible Authority, is not required to make representations on behalf of other persons, but may do so in appropriate circumstances.
- 8.16 In cases where the Royal Borough, as a Licensing Authority, is also acting as a Responsible Authority in relation to the same process, a separation of responsibilities and process will be implemented within the authority to ensure procedural fairness and to eliminate any conflicts of interest. Separation will be achieved by allocating distinct functions to different officers within the authority. The officer advising the Licensing Committee shall be separate from the officer acting as the Responsible Authority and there shall be no discussion between those officers regarding the merits of the case.
- 8.17 Issues relating to the licensing objectives can take place in relation to licenced premises despite the best efforts of the licensee, as they may occur outside the licensee's sphere of influence and legal control. However, the duty to promote the licensing objectives requires the Royal Borough to take account of representations that raise such activity in relation to a particular area when making decisions on applications.

## **9 Determination of Licence Applications**

- 9.1 Applications that do not receive representations shall be granted automatically. Applications that do receive representations shall be considered by the Royal Borough under the terms of this policy on their own merits and with due regard to the Guidance issued under Section 182 of the Licensing Act 2003, the Licensing Act 2003 itself, and any supporting regulations.
- 9.2 This policy does not override the right of any person to make relevant representations on an application or seek a review of a licence or certificate where provision has been made for them to do so in the Act. A representation will usually only be relevant where it relates to one or more of the licensing objectives, specifically:
- the prevention of crime and disorder;
  - public safety;
  - the prevention of public nuisance; or
  - the protection of children from harm.

- 9.3 The Royal Borough expects that all staff involved in the sale of alcohol will receive training. Higher standards are expected of Designated Premises Supervisors (DPS) because they have a higher level of knowledge as holders of a personal licence qualification. Therefore, the competency and conduct of personal licence holders and the DPS will be considered much more robustly as having a material role on a venue's impact when considering new applications, reviews or applications for variation.

## 10 Garages and Primary Use

- 10.1 Under Section 176 of the Licensing Act 2003, a premises licence, club premises certificate or temporary event notice, will not have effect at premises that are used primarily as a garage, or are part of premises used primarily as a garage. "Garage" is defined as premises selling petrol or derv, or selling or maintaining motor vehicles and accessories.
- 10.2 The Royal Borough acknowledges that Section 176 does not prohibit a premises licence (etc) from being granted. However, the Section 182 Guidance does require that where a representation is made concerning s.176 of the Act (noting that the representation must still engage with the licensing objectives – e.g. on grounds of public safety, or that of crime and disorder, etc), the Licensing Authority must decide whether or not the premises are used primarily as a garage, and may ask the licence holder to provide further information to help establish what the primary use of the premises is; for example, but not limited to, transaction or footfall data.
- 10.3 It is anticipated that applicants will co-operate with requests for this data. However, where it cannot be provided and the Royal Borough considers it to be necessary for its consideration of the representation to which it relates, the Royal Borough reserves it right to adjourn any hearing until a future specified date to allow time for said data to be collected.
- 10.4 Where an application for a premises licence is granted at premises that do operate as a garage, the Royal Borough may impose a condition requiring that the licence holder provides data to Licensing Authority that demonstrates the primary use of the premises and, as such, that alcohol sales continue to be authorised by the licence. A model condition for this purpose can be found within **Appendix A**.

## 11 Cumulative Impact Policy

- 11.1 The 'cumulative impact' on the licensing objectives of a concentration or clustering of multiple licenced premises may rise to a relevant representation when an application for the grant or variation of a premises licence is being considered, but not in relation to an application for review which must relate to individual premises.
- 11.2 The Royal Borough may receive representations from either a Responsible Authority or an "other person" (both defined by the Act), that the cumulative impact of new licences is leading to an area becoming saturated with premises, making it a focal point for large groups of people to gather and thereby creating exceptional problems of disorder and nuisance, or otherwise compromising the licensing objectives, over and above the impact from the individual premises



themselves. In such cases, the issue of saturation may be taken into account when considering the individual merits of any application.

11.3 The Royal Borough has received evidence that the cumulative impact of licenced premises is continuing to undermine the licensing objectives in the following areas:

- Greenwich Town Centre;
- Trafalgar Road and environs;
- Plumstead High Street;
- Woolwich Town Centre;
- Herbert Road (off Plumstead Common Road);
- Eltham Town Centre;
- The O2 and environs.

11.4 These areas will be referred to throughout the remainder of this statement of policy as the Cumulative Impact Zones (CIZs).

11.5 After considering this evidence, the Royal Borough has adopted a cumulative impact policy in respect of these zones.

11.6 The latest evidence for the adoption of the cumulative impact policy together with maps of the cumulative impact zones is attached at **Appendix H** of this policy, as updated in March 2022 (the original data, dated May 2020 remains at **Appendix G**).

11.7 The effect of the cumulative impact policy is that the Royal Borough will refuse applications for new premises licences or club premises certificates, or material variation of an existing licence or certificate, whenever it receives relevant representations, unless an applicant can demonstrate why the grant or variation involved will not add to the cumulative impact experienced.

11.8 The impact can be expected to be different for premises with different styles and characteristics and in different cumulative impact zones. The Royal Borough recognises that within areas of regeneration, there is a need for an attractive night-time economy that is fully inclusive and encourages families back into the town centre in the evening and most importantly that it is safe. The impact, for instance, of a late night vertical drinking establishment or an off-licence would not be considered beneficial to the licensing objectives, whereas a restaurant with ample seating that closes at 11:00pm could be considered to have a positive impact on the licensing objectives. An applicant within a CIZ will need to demonstrate in their application that, if granted, a licence will have a positive influence on the licensing objectives.

11.9 The Royal Borough recognises that within different CIZs different types of licenced premises mutually benefit from each other's existence, attracting large groups of people. This in turn may increase the possibility of crime and disorder and public nuisance, thus impacting on the promotion of the licensing objectives. For this reason, special consideration will be given to all classes of licenced premises within the cumulative impact zones.

11.10 The adoption of a cumulative impact policy for these areas does not relieve responsible authorities or other persons of the need to make a relevant representation. Before the Royal Borough may lawfully consider giving effect to this cumulative impact policy, a relevant

representation must have been made. If no representations are received, it remains the case that any application must be granted in terms that are consistent with the operating schedule and any mandatory conditions required by the Act.

11.11 Responsible authorities and other persons may, however, make written representations, maintaining that it is necessary to refuse an application within the cumulative impact zone for the promotion of the licensing objectives, and in doing so may refer to the evidence considered by the Royal Borough in the adoption of the “cumulative impact policy”.

11.12 The Royal Borough will not use any cumulative impact policy:

- As grounds for revoking an existing licence or certificate.
- Where a complaint relating to a crime or disorder or nuisance situation in a cumulative impact zone is only linked to particular premises.
- To refuse applications to vary an existing licence or certificate, except where the modifications are directly relevant to the “cumulative impact policy”.

11.13 The cumulative impact policy does not include provision for terminal hours in respect of premises within these areas, nor does it impose quotas on the number of licenced premises permitted or the capacity of those premises.

11.14 The Royal Borough will regularly review each cumulative impact policy in place in respect of premises in these areas, to see whether it is still needed or should be removed, reduced or expanded.

11.15 The Royal Borough recognises that there are other mechanisms both within and outside the licensing regime available for addressing the cumulative effect of licenced premises, which may include:

- Planning controls.
- Positive measures to provide a safe and clean town centre environment in partnership with local businesses, transport operators and other departments of the Royal Borough.
- The provision of CCTV surveillance in town centres, ample taxi ranks, provision of public conveniences open late at night, street cleaning and litter patrols.
- The Public Space Protection Order in Woolwich Town Centre, which was renewed in July 2019 and is in force for 3 years. It is used to combat anti-social behaviour in the area by restricting the consumption of alcohol in a public space. Anyone who does not surrender an open container of alcohol when asked by a duly authorised person may be required to leave the area covered by the Order for 48 hours, and may face a fine. Premises licenced for alcohol sales within the PSPO are not subject to the restrictions when the licence is being used within the ambit of its approved layout plan (or for 30 minutes after). The Royal Borough officers and Licensing Committee will be entirely neutral when considering applications for alcohol licences located with the PSPO.
- Police enforcement of the general law in regard to disorder and anti-social behaviour, including the issue of fixed penalty notices.
- The prosecution of any personal licence holder or member of staff at such premises who is selling alcohol to people who are drunk.

- Police powers to close down instantly for up to 24 hours any licenced premises or temporary event on the grounds of disorder, the likelihood of disorder, or noise emanating from the premises causing a nuisance.
- The powers of Police, other responsible authorities, residents and local business to seek a review of the licence or certificate.

## **12 Licensing Hours**

- 12.1 The Royal Borough recognises that simultaneous closing times in certain areas can lead to peaks of disorder and disturbance on the streets when large numbers of people tend to leave licenced premises at the same time. The licensing objectives will be a paramount consideration at all times when considering the individual merits of each case.
- 12.2 Shops, stores and supermarkets should generally be permitted to sell alcohol for consumption off the premises during the normal hours they intend to open for shopping purposes. However, in the case of individual shops which are known to be a focus of disorder, or in an area which is the focus of disorder and disturbance, then, subject to representations, a limitation on licenced hours may be appropriate. The same may be true for premises that are within proximity to groups of people particularly vulnerable to alcohol and its impacts, including schools, drugs and alcohol treatment services, gambling establishments, learning difficulties and mental health provisions.
- 12.3 The Royal Borough will deal with the issue of licensing hours on the individual merits of each application. However, when issuing a licence, stricter conditions will be expected with regard to noise control in the case of premises that are situated in areas that have a greater density of residential accommodation. This will particularly apply in circumstances where, having regard to the location, size, and nature of the licenced premises, it is likely that disturbance will be caused to residents in the vicinity of the premises by concentrations of people leaving during normal night-time sleeping periods from 23:00 hours to the following 07:00 hours.
- 12.4 The Royal Borough expects applicants to provide a noise management plan as part of the operating schedule where there is to be an outside drinking area or when licenced activities involve amplified music. The suitability of the premises in terms of the building's capacity to limit sound will be taken into account when decisions are made in respect of applications that include amplified music.
- 12.5 In respect of premises supplying take-away food as a primary activity, there will be a presumption that the Royal Borough will not licence premises to permit the supply of alcohol for consumption off the premises between the hours of 2300 hours and the following 0500 hours.

## **13 Partnership Working with Responsible Authorities**

- 13.1 In the Royal Borough of Greenwich there is a collaborative working relationship between planning and licensing. Licensing applications are discussed and mutually agreed prior to determination, regarding hours of operation and appropriate, proportionate conditions. However, the two regimes remain properly separated thus avoiding duplication and inefficiency. The planning and licensing regimes involve consideration of different, albeit related, matters. Licensing Committees are not bound by decisions made by a Planning Committee, and vice versa.

The existence or otherwise of planning permission or building control cannot be considered a determining factor in considering a licensing application or a prerequisite to the granting of a licence.

- 13.2 There are circumstances when, as a condition of planning permission, a terminal hour has been set for the use of premises for commercial purposes. Where these hours are different to the licensing hours, the applicant must observe the earlier closing time. Premises operating in breach of their planning permission would be liable to prosecution under planning law. Proper integrations should be assured by Licensing Committees, where appropriate, providing regular reports to planning committee.
- 13.3 There exist several focus groups / meetings attended by the Licensing team which also promote partnership working.
- 13.4 Greenwich Licensing Partnership Meeting (GLPM). The responsibilities of the GLPM include:
- Agreeing a list of priority premises;
  - Deciding partnership response to promote the licensing objectives in relation to the priority premises;
  - Considering and agreeing actions on applications currently being consulted on;
  - Considering and agreeing actions on all applications to be decided at forthcoming Licensing Committee hearings;
  - Considering licensing training needs for Safer Spaces team officers and communications with Safer Spaces panels;
  - Considering and agreeing on appropriate communications in relation to current activity.
- 13.5 Licensing Safety Advisory Group (SAG) meetings are organised as part of best practice for large open-air events. SAGs are recommended by the Health & Safety Executive (in the purple Large Events Guide).
- 13.6 Security meetings are organised by The O2 to pro-actively address the night-time economy at The O2.
- 13.7 Trading Standards liaises with responsible authorities to share intelligence relating to the protection of children from harm. This intelligence is used as one guide to advisory and enforcement actions.
- 13.8 Trading Standards carry regular covert test purchase procedures to ensure compliance with the mandatory code in relation to underage sales, counterfeit and duty evaded goods.
- 13.9 If such sales are made, the evidence provided by Trading Standards, contributes to requesting the review of a licence or additional conditions on the existing licence.
- 13.10 Trading Standards will work to support greater awareness and availability of Proof of Age Standards Schemes (PASS) as an acceptable form of ID for young adults.
- 13.11 The Royal Borough's Safer Spaces team exists to reduce the incidence of anti-social behaviour, environmental crime and other community safety concerns to make the Royal Borough a safer,

cleaner and healthier place for residents, businesses and visitors. The Licensing team works closely with the Safer Spaces team where licenced premises are linked to these issues. This includes sharing intelligence, mapping of our Cumulative Impact Zones, supporting enforcement action through the PSPOs and similar schemes, joint days of action, and project work such as the Reducing the Strength Scheme, which now includes over one hundred off-licenced premises across the Borough who have voluntary removed super-strength beers, lagers and ciders of 6.5% ABV and higher, and who have limited the sale of single cans.

- 13.12 The SMACE is attended by licensing officers to share intelligence and address concerns around safeguarding issues across the borough. See the Protection of Children from Harm section for further information.

## **14 Licence Reviews**

- 14.1 A Premises licence, once granted, lasts for the life-time of the business and is not subject to annual or automatic renewal. The proceedings set out in the 2003 Act for reviewing premises licences and club premises certificates represent a key protection for the community where problems associated with the licensing objectives occur after the grant or variation of a premises licence or club premises certificate.
- 14.2 The Royal Borough recognises that the promotion of the licensing objectives relies heavily on a partnership between premises licence and club premises certificate holders, authorised persons, other persons and Responsible Authorities in pursuit of common aims. The Royal Borough will endeavour to give premises licence and club premises certificate holders early warning of their concerns about problems identified at the premises and the need for improvement. The Royal Borough, where time allows, are prepared to facilitate mediation between the licensee and those who may be intending to review the licence.
- 14.3 Reviews can be sought at any stage following the grant of a premises licence or club premises certificate by a Responsible Authority or any other person who can demonstrate they are affected by licensable activities taking place at premises. This includes local Ward Councillors or bodies such as residents or business groups. An application for review may be requested as a result of matters arising at the premises in connection with any of the four licensing objectives.
- 14.4 Reviews may arise where there is a change of circumstances or use of a premises, such as a new residential development in what was previously a predominantly commercial area or a change in the premises operation giving rise to complaints that impact on the promotion of the licensing objectives. In these circumstances, complaints should initially be directed to the Licensing Authority and the Police for investigation and to provide evidence for any possible review proceedings.
- 14.5 While serious issues of crime, disorder, and safety will be investigated and enforced through the responsible authorities, such as the Police, it remains the right of residents and traders to request a review of a premises licence at any time by completing the review application form. This may be an appropriate course of action to take where there are ongoing or multiple issues that when taken in isolation may seem trivial, but collectively or over an extended period of time cause genuine nuisance and issues for members of the public living or working nearby.

- 14.6 Where reviews are submitted, the licensing sub-committee has a wide range of decision options open to it, although it should be noted that immediate revocation of a licence in the first instance may not necessarily be considered a proportional outcome. Such a review may instead seek to introduce measures of mitigation to the problems identified, for example, a reduction in permitted hours or the introduction of conditions similar to those within our model conditions (see Appendices A – E).
- 14.7 On receipt of the request to review, RBG will consult with local residents living within the vicinity of the premises and invite them to “make representation”. Time-allowing, RBG will facilitate mediation between the licence holder, the person requesting the licence review, and any other persons. In any case, RBG will hold a formal review hearing to consider the issues raised in the request to review the licence, and any representations that are received in response to the consultation. Where proposed conditions have been agreed between all parties the Committee will consider these proposals. The Committee will then issue its decision, for which all involved parties have right of appeal through the magistrate’s court.
- 14.8 Where a licence is retained, but problems reoccur or are not resolved, subsequent reviews may be applied for which, in turn, may attract stronger sanctions.
- 14.9 Those requesting a review are invited, and strongly encouraged, to attend the committee hearing along with those who made representation, though this is not a legal requirement and hearings can proceed in their absence.
- 14.10 The Royal Borough of Greenwich accepts applications for review electronically without the requirement for a hard copy. However, these applications are outside the formal electronic application process and may not be submitted via GOV.UK or the Royal Borough’s electronic facility.
- 14.11 In addition, the Royal Borough of Greenwich must review a licence if the premises to which it relates was made the subject of a Closure Order by the Police based on nuisance or disorder and the appropriate magistrates’ court has sent the Royal Borough of Greenwich the relevant notice of its determination, or if the Police have made an application for summary review on the basis that premises are associated with serious crime and/or disorder.
- 14.12 Where a review of a premises licence is sought, this must relate specifically to a premises licence or club premises certificate, relating to individual premises.
- 14.13 The Royal Borough may reject an application made by other persons if it determines that the grounds for the review are vexatious, frivolous or repetitious. The Royal Borough may not reject an application for review on these grounds from a Responsible Authority.
- 14.14 Premises subject to review must display a statutory notice so it is visible to passers-by, stating the grounds for review and advising those who wish to make a representation to write to the Licensing Section of the Royal Borough. The Royal Borough will also place similar notices on the exterior of the Town Hall opposite where the Licensing Authority is based and on the Royal Borough of Greenwich website. In addition to this, the Royal Borough may carry out a letter-



drop to residents and traders in the vicinity of the premises, notifying them of the application for review.

- 14.15 The Royal Borough of Greenwich accepts written representations to reviews electronically without the requirement for a hard copy. Representations may be amplified at the subsequent hearing or may stand in their own right. Additional representations which do not amount to an amplification of the original representation may not be made at the hearing.

## **15 Summary Reviews**

- 15.1 Summary reviews can be undertaken when the Police consider that the premises concerned are associated with serious crime or serious disorder, or both. The summary review process allows interim conditions to be quickly attached to a licence and initiates a fast-track licence review. The power applies only where a premise licence authorises the sale of alcohol.
- 15.2 The Police have the power to review a premises licence with immediate effect where a senior Police officer considers there is the risk of serious crime or serious disorder or both at the premises. The Royal Borough will consider any immediate interim steps that may include modifying the licence conditions, suspending the licence, or removing the designated premises supervisor (DPS). The Royal Borough shall carry out a full review of the licence within 28 days. The Royal Borough may take steps without consulting with the licence holder. If interim steps are taken, the Royal Borough shall immediately notify the licence holder and the Police. The licence holder is entitled to make representations at this stage and a hearing will be held to allow this.
- 15.3 The full licence review shall be held within 28 days of the original Police review application. The review may result in modification of the licence conditions, removal of the DPS, suspension of the licence for up to three months, or revocation of the licence. Representations will be accepted from any other person or Responsible Authority either on behalf of or against the licence holder.

## **16 Temporary Event Notices**

- 16.1 Temporary Event Notices, or TENs, may be submitted where a premises user seeks to provide licensable activities at events that are not authorised by an existing premises licence, or in venues or locations where no licence is held, subject to the following limitations:
- The event shall have a capacity of no more than 499, inclusive of attendees, staff and performers, etc;
  - The event shall last no longer than 168 hours (7 days);
  - No more than 15 events will be held at any one premises within a calendar year;
  - The maximum number of aggregate days that TENs may cover within a calendar year is 21;
  - Consecutive TENs must be submitted with at least a 24-hour gap between them, where they are submitted by, or on behalf, of the same premises user;
  - A Personal licence holder may submit up to 50 TENs per calendar year (of which up to 10 may be “late” as described below);
  - Non-personal licence holders may submit up to five TENs per calendar year (of which up to two may be “late” as described below).

- 16.2 If any of the limits above are exceeded, the Royal Borough will issue the premises user with a Counter Notice, nullifying the TEN and prohibiting licensable activities from taking place.
- 16.3 There are two types of TEN: a standard TEN and a late TEN. These are subject to different processes: a standard notice is given no later than ten working days before the event to which it relates; and a late notice is given not before nine and not later than five working days before the event. "Working days" exclude the day the notice is received and the first day of the event; Saturdays & Sundays; and any intervening bank holiday. TENs given less than five days before the event to which it relates will be returned as void and the activities to which it relates will not be authorised.
- 16.4 Premises users must submit their TEN to the Royal Borough's Licensing Department, with copies supplied to the Royal Borough's Environmental Health departments, and to the Greenwich Licensing Unit in the Metropolitan Police. The only exception is where TENs are submitted and paid for through electronic means (e.g. online), in which case the Royal Borough will forward the application onto all relevant parties on the premises user's behalf.
- 16.5 Where the TEN is in order, the relevant fee paid, and the event falls within the prescribed limits, the Royal Borough will record the notice in its register and send an acknowledgement to the premises user within two working days. However, the event will not be authorised until the consultation period has expired.
- 16.6 The Police and Environmental Health have a period of three working days from when they are given the notice in which they may object to it on grounds related to the promotion of one or more of the four licensing objectives.
- 16.7 For standard TENs, where an objection is given, there is provision under the legislation for the Police or Environmental Health to agree with the premises user to modify the TEN in terms of activities sought and times permitted, or where there is a pre-existing premises licence, for conditions from that licence to apply to the activities authorised by the TEN. If all parties agree, the objection(s) may be treated as withdrawn and the licensable activities shall be authorised. If agreement cannot be reached, the notice will be deferred to the Authority's Licensing Sub-Committee to determine whether to uphold the objection(s), or whether to allow the event to proceed, with or without conditions, as the Sub-Committee deem appropriate.
- 16.8 In the case of late TENs, if objections are received from either the Police or Environmental Health, the event will not be permitted, and a Counter Notice will be issued, instantly nullifying the TEN. Because of the short timescales, there is no scope for modification of the TEN and no right of appeal.
- 16.9 It should be noted that a Temporary Event Notice does not absolve the premises user of any responsibilities under any other legislation, such as planning law – i.e. a TEN does not override restrictions, such as those regarding the terminal hour of operation of the premises, on its planning permission.
- 16.10 When a TEN is submitted, the Royal Borough expects that the following information will be provided:



- Evidence of permission to use outside space for an event, specifically where the outside space is Council or public land.
- A clear description of the area in which they propose to carry out the licensable activities.
- A risk assessment including how many people will be attending the event.
- Information with regards to age-related events, with an emphasis on 18<sup>th</sup> & 21<sup>st</sup> Birthdays.

16.11 It should be noted that any events whereby SIA security are used, with the potential for interaction with persons under 18 years, those SIA staff are required to be 'enhanced trained'.

## **17 Smoking and the use of External Areas**

17.1 Where an application includes provision of a smoking shelter, the Royal Borough expects the shelter to be situated as far as possible from residential premises and children's play areas.

17.2 Any external smoking shelters must conform with the "50% Rule" of the Health Act 2006 ("the smoke-free legislation"). Put simply, this means that any smoking area with a roof cannot be surrounded by walls that encompass more than half of the available space. For the purpose of calculating the available space, any area that can be closed (e.g. door, windows, sliders or shutters, etc) must be treated as if it were closed.

17.3 In relation to smoking outside licenced premises, the Royal Borough expects:

- The provision and maintenance of suitable receptacles for customers to dispose of cigarette litter in areas used, or likely to be used, for smoking;
- Licensees to take all reasonable steps to discourage smoking on the public highway close to residential premises, particularly after 22:00 hours. This could include measures such as a ban on customers taking drinks outside on to the public highway, restricting the number of people smoking outside, the use of a cordoned-off section of the highway as a smoking area, the use of door supervisors, or imposing a time after which re-admissions to the premises will not be permitted.
- Garden areas (e.g. a pub beer garden) to be cleared at a reasonable time where not doing so could cause nuisance to neighbouring residents.
- Where alcohol consumption takes place at exterior tables and chairs, a licence variation will be required if the supply of alcohol takes place outside the premises or if the licence prohibits drinks being taken outside.
- Smoking is not permitted near to the major access and egress points to the premises, especially those that may be used by children.

17.4 Smoking shisha is an increasingly popular activity across all ethnic groups, though particularly among young people. While there are not many shisha bars operating in Royal Greenwich, there has been an increase in enquiries about operating shisha bars as an addition to serving alcohol. Shisha produces second-hand smoke, so when used in public spaces, it is covered by the smoke-free legislation, whether or not it contains tobacco. Shisha product must also be legal, have duty paid, comply with labelling requirements, and be notified to the MHRA. Like all tobacco products, shisha is an age-restricted product and may not be sold to young people under 18 years of age. Licensees who wish to consider operating a shisha premises alongside the supply of alcohol must consider if they can do so in full compliance of all the requirements of Planning,

Environmental Health and Trading Standards. Contact Greenwich Trading Standards on 020 8921 8223 / [tradingstandards@royalgreenwich.gov.uk](mailto:tradingstandards@royalgreenwich.gov.uk) to request further advice.

- 17.5 The Royal Borough Trading Standards and Public Health departments work closely together in reducing the prevalence of smoking in the Borough. Smoking is much more prevalent in deprived communities. The cost of buying illegal tobacco can be as little as half the cost of legitimate products. Where cheap illicit tobacco is available, this makes it more affordable and attractive to young people, increasing the uptake of smoking. It also undermines wider tobacco control efforts and does not support smokers wishing to stop. The main concerns about illegal tobacco are:
- Availability of illegal tobacco and the sale of singles makes it more likely that children will start smoking and damage their health.
  - Illegal tobacco has strong links to low-level and large-scale organised crime.
  - It brings crime into our communities.
  - It undermines 'stop smoking' services and makes it harder for smokers to quit.
- 17.6 Illegal cigarettes may be fake or counterfeit, foreign labelled or smuggled. They will therefore not have paid UK duty, may not comply with the labelling and health warning requirements, and will not meet the Reduced Propensity Cigarettes Regulations 2011, which were introduced to reduce the number of domestic fires and deaths caused by discarded and unextinguished cigarettes. The Guidance issued under Section 182 of the Licensing Act 2003 states that the sale and storage of smuggled tobacco (and alcohol) is a serious criminal activity, and that authorities will use the licence review procedure to deter such activities. Where reviews arise, and the Licensing Authority determines that the crime prevention objective is being undermined through the premises being used to further crimes, it is expected that revocation – even in the first instance – shall be seriously considered.
- 17.7 The Royal Borough therefore expects licensees to report to Trading Standards any suspicions of sales, or offers for sale, of illegal / illicit tobacco on their premises: 020 8921 8223 or [tradingstandards@royalgreenwich.gov.uk](mailto:tradingstandards@royalgreenwich.gov.uk).

## **18 Alterations to Licenced Premises Plans & Licences**

- 18.1 The required plans submitted in a licensing application form part of the premises licence or club premises certificate and must not be altered without the consent of the Royal Borough. Licensees must always consult with the Royal Borough's Licensing Service before making any alterations to the licenced premises that may affect that plan.
- 18.2 The Royal Borough will only accept applications for minor variations to plans for the premises if they are satisfied that the application will not impact adversely on the licensing objectives. If the intended alteration to the plans has the potential to impact on the licensing objectives, a full variation or grant application will be requested.

## **19 Enforcement**

- 19.1 The Royal Borough has established enforcement protocols with the Metropolitan Police, Home Office Immigration and other regulatory services within the Council. These protocols provide

for focused enforcement of problem high-risk premises breaching the licensing objectives, but with a lighter touch being applied to low-risk premises where there is no evidence of breach.

- 19.2 The Royal Borough fully recognises the role businesses play in supporting our social life and the local economy. The Royal Borough will work with the Police to ensure that effective action is taken to deal with unlicensed activity, breaches of licence conditions, or crime and disorder associated with licenced premises. It should be noted that investigations will be undertaken through a range of means including overt and covert operations. It should be noted that the Royal Borough's Trading Standards Officers or the Police will carry out test purchases of alcohol using young volunteers. Follow up visits to licenced premises will include inspection for the presence of duty-evaded or counterfeit products.
- 19.3 An ongoing risk-based enforcement programme is in place to ensure we respond to complaints of non-compliance with licence conditions and we concentrate on areas where licenced premises are perceived to be contributing to anti-social behaviour. A sample of premises may also be inspected from time to time to ensure that the premises are operating in accordance with relevant licensing requirements.
- 19.4 The Royal Borough's Trading Standards team carry out regular covert test purchase procedures to ensure compliance with the mandatory code in relation to underage sales, counterfeit and duty evaded goods. If such sales are made, the evidence provided by Trading Standards contributes to requesting the review of a licence or additional conditions on the existing licence.
- 19.5 In general, action will only be taken in accordance with agreed enforcement principles outlined in the Regulators' Compliance Code and in line with the Royal Borough's Enforcement Policy. To this end, the key principles of consistency, transparency, accountability, proportionality and targeted action will be maintained.

## **20 Integrating Strategies**

- 20.1 Licensing law is not the primary mechanism for the general control of nuisance and anti-social behaviour by individuals once they are away from licenced premises and beyond their direct control. However, licensing law is a key aspect of a holistic approach to the management of the night-time economy in town centres.
- 20.2 By consulting widely prior to this policy statement being published, the Royal Borough aims to secure proper integration with local crime prevention, planning, transport, tourism, equality schemes, cultural and other strategies introduced for the management of town centres and the late night-time economy. Many of these strategies are not directly related to the promotion of the licensing objectives, but, indirectly, impact upon them. Co-ordination and integration of such policies, strategies and initiatives are therefore important.
- 20.3 The Royal Borough Corporate Plan 2018- 2022 includes the objectives of a Safer and a Cleaner, Greener Greenwich. The Safer Greenwich objective aims are:
- To work with partners in the Police and resident groups to help make our borough safer.
  - To help to make the borough roads safer and provide safe spaces for communities to use.
  - To prioritise approaches to tackling domestic abuse in all its forms.

- To foster cohesive communities and counter radicalisation.
- To tackle gang activity and violence.
- To take a tough approach to anti-social behaviour by working with partners and involving our local communities at every opportunity.
- To ensure safe and legally compliant housing.

The Greener, Cleaner Greenwich objectives are to:

- Improve our green and public spaces.
- Reduce anti-social behaviour in our green and public spaces.
- Work towards stopping the use of disposable coffee cups and straws, and replacing single-use plastics with non-glass reusable or biodegradable containers.
- Take action to improve air quality, and encourage renewable energy and green, environmentally-friendly choices within the Royal Borough.
- Work with schools and communities to encourage a reduction in school runs by making sure school entrances and surrounding streets are safer.

- 20.4 Services within Community Safety and Environmental Health are at the heart of the Royal Borough Integrated Enforcement (IE) approach, increasing collaboration, co-ordination and communication across internal and external partners to deliver better community safety outcomes for residents' businesses and visitors to borough.
- 20.5 Safer Communities enables the Royal Borough to meet its statutory responsibilities in working with partner agencies, bodies and groups to reduce crime and disorder within the Borough boundaries. It co-ordinates the Safer Greenwich Partnership and leads on the production and implementation of the Royal Borough Community Safety Plan. It is also involved in a number of operational crime reduction panels and initiatives particularly focused on key thematic areas such as domestic abuse, violence against women and girls, modern slavery and hate crime.
- 20.6 The Government's Alcohol Strategy (March 2012) identifies a number of priorities to reduce problems associated with under-age drinking, reducing public drunkenness and the health risks associated with irresponsible drinking, and prevent alcohol-related violence.
- 20.7 There is consistent evidence that the price, availability and marketing of alcohol are related to harm from alcohol.
- 20.8 The Safer Spaces service area brings together our new and enhanced Community Safety Enforcement and CCTV teams to deliver a more cohesive approach to delivering safer, and cleaner, public spaces across the Royal Borough of Greenwich. Safer Spaces is responsible for improving community safety outcomes primarily throughout the Royal Borough's main town centres, secondary shopping areas, and parks. In support of the Council's approach to Integrated Enforcement, the service also works collaboratively with other enforcement colleagues and agencies, and in other parts of the borough as required.
- 20.9 There is clear correlation in Royal Greenwich between wards with a higher density of licenced premises and the rate of alcohol-related crime, and ambulance call-outs (particularly for young people).

- 20.10 Although there is limited evidence of the causal relationship between licenced premises and alcohol-related harm, longitudinal studies and natural experiments suggest that increases in the number of outlets (particularly leading to 'bunching' of several premises) lead to increased binge drinking and alcohol-related violence. This evidence, combined with the consistent correlations between outlet density and harm from alcohol, leads most to conclude that reducing availability of alcohol is an effective measure to reduce alcohol harm. The NICE guidance 'Alcohol-Use Disorders: Preventing Harmful Drinking' recommends that local authorities identify areas that have high densities of licenced premises and high rate of harm from alcohol, and limit new premises in these areas.
- 20.11 There is evidence that density of licenced premises is associated with increased risk of domestic violence in the local area. In areas likely to be experiencing high rates of domestic violence, such as those with greater levels of economic deprivation, consideration should be given to the potential exacerbation of risk factors that additional licenced premises may entail.
- 20.12 Where any protocols to be agreed with the Police identify a particular need to disperse people from town centres swiftly and safely to avoid concentrations which could lead to disorder and disturbance that may have a negative cumulative effect, the Royal Borough will aim to inform those responsible for providing local transportation so that arrangements can be made to reduce the potential for problems to occur.
- 20.13 The Royal Borough will aim to adopt the best practice described in the Greater London Authority publication: Approaches to Managing the Night-Time Economy (July 2019). The case studies bring together examples of initiatives driven by councils and their partners which sought to address the issues they have faced locally. Although the issues may differ, the mechanisms for addressing them are likely to be similar and may help Royal Greenwich to strengthen and improve the management of the night-time economy.
- 20.14 There are a number of wider issues that may need to be given due consideration when dealing with applications. The Royal Borough's Licensing Sub-Committee may upon request, or when considered appropriate, receive reports on the:
- Needs of the local tourist economy.
  - Cultural strategy for the area.
  - Employment situation in the area and the need for new investment and employment where appropriate.
  - Planning considerations which might affect licenced premises.
  - Crime and disorder issues within the Borough.
  - Sustainability of a greener Greenwich.
- 20.15 The Royal Borough, where appropriate, will attach conditions to premises licences and club premises certificates, so far as possible, to reflect local crime prevention strategies. For example, the provision of CCTV cameras in certain premises. Where appropriate, it should reflect the input of the Safer Greenwich Partnership.
- 20.16 The Royal Borough's Licensing Sub-Committee may also from time to time provide appropriate reports to other Committees and organisations for their consideration.

## **21 Equalities**

- 21.1 It is fully recognised that the Equality Act 2010 places a legal obligation on the Royal Borough to have due regard to:
- Eliminate unlawful discrimination, harassment and victimisation, and other conduct prohibited by the Equalities Act 2010.
  - Advance equality of opportunity between people who share protected characteristics and those who do not.
  - Foster good relations between different people who share protected characteristics and those who do not.
- 21.2 The Royal Borough is committed under the Greenwich Equality Policy (2017). The duty ensures all forms of equality and applies in respect of all protected characteristics, which are age, disability, race, gender, religion or belief, sexual orientation, gender reassignment, pregnancy and maternity, and marriage and civil partnership (employment only).
- 21.3 The Royal Borough of Greenwich will ensure the Equality Policy is carried out by:
- Ensuring that equality is fully integrated into mainstream service planning, commissioning, management and delivery.
  - Completing equality impact assessments on all relevant, key decisions.
  - Monitoring services and council employment by equality criteria.
  - Publishing specific and measurable equality objectives.
  - Publishing information showing how we have complied with our legal responsibilities.
  - Providing training and information for our staff to ensure they are aware of the policy and able to apply it when carrying out their duties.
  - Consulting with stakeholders where appropriate.

## **22 Licence Fees**

- 22.1 The Royal Borough, under the Licensing Act 2003, must suspend a premises licence or club premises certificate if the annual fee is not paid when it is due. However, there is a grace period of 21 days if the payment was not made before, or at the time of, the due date because of an administrative error, or because the holder disputed liability for the fee before, or at the time of, the due date. If the dispute or error is not resolved during the 21-day period, the licence will be suspended.
- 22.2 The Royal Borough, when suspending a licence or certificate, will notify the holder in writing and specify the date on which the suspension takes effect. The date of suspension shall be at least two working days after the day the Royal Borough gives the notice.
- 22.3 A suspension ceases to have effect on the day on which the Royal Borough receives cleared payment of the outstanding fee from the licence or certificate holder.

## **23 The Licensing Process**

- 23.1 Powers of the Royal Borough under the Act may be carried out by the Licensing Committee, by a Sub-Committee, or by one or more officers acting under delegated authority.



- 23.2 It is considered that many of the functions will be administrative in nature and, in the interests of speed, efficiency, and cost effectiveness, these will be carried out by officers. Such delegated decisions will be listed for information at a Licensing Committee meeting upon request.
- 23.3 The Licensing Sub-Committee/s will deal with applications where there are relevant representations or objections (that have not been withdrawn), as well as any applications for the review of a licence prompted by representations from any of the relevant bodies.
- 23.4 When determining applications, the Royal Borough will have regard to any Guidance issued by the Home Office. In particular, account will be taken of the need to encourage and promote live music, dancing and theatre for the wider cultural benefit of the community as a whole. If representations are made concerning the potential for limited disturbance in a particular neighbourhood, the Royal Borough's consideration will balance the representations against the potential wider benefits to the community.
- 23.5 When attaching conditions to licences, the Royal Borough will also be aware of the need to avoid measures that might deter live music, dancing or theatre by imposing indirect costs of a substantial nature. The Royal Borough will monitor the impact of licensing on regulated entertainment, particularly live music and dancing. If there is evidence that licensing requirements deter such activities in Royal Greenwich, it will consider how to mitigate the adverse effects and if necessary will review the Licensing Policy.
- 23.6 The Royal Borough encourages the licensing of public spaces for cultural and community events. By licensing the public space, event organisers do not need to obtain a licence themselves for individual events. The views of other persons and responsible authorities will be considered in ensuring the premises licence fully meets the requirements of the licensing objectives.
- 23.7 The Director of Housing & Safer Communities has delegated authority, in consultation with the Chief Executive and Leader, to determine whether licensing matters should be considered by the Licensing Committee. Except where it is decided that a matter should be determined by the full Licensing Committee, the Royal Borough accepts the Secretary of State's recommendations that delegation by the Licensing Committee will be approached in the following way:

<b>Matter to be dealt with:</b>	<b>Sub-Committee</b>	<b>Officers</b>
Application for personal licence.	If a Police objection made.	If no objection made.
Application for personal licence with unspent convictions.	All cases.	
Application for premises licence/club premises certificate.	If a relevant representation made.	If no relevant representation made.
Application for provisional statement.	If a relevant representation made.	If no relevant representation made.
Revocation or suspension of personal licence by local authority where it becomes aware of	All cases.	

<b>Matter to be dealt with:</b>	<b>Sub-Committee</b>	<b>Officers</b>
convictions or immigration penalties.		
Application to vary premises licence/club premises certificate.	If a relevant representation made.	If no relevant representation made.
Application to vary designated premises supervisor.	If a Police objection.	All other cases.
Request to be removed as designated premises supervisor.		All cases.
Application for transfer of premises licence.	If a Police objection.	All other cases.
Applications for interim authorities.	If a Police objection.	All other cases.
Application to review premises licence/club premises certificate.	All cases.	
Withdrawal of club premises certificate under Section 90.	All cases.	
Decision on whether a complaint is irrelevant, frivolous, vexatious, etc.		All cases.
Decision to object when local authority is a consultee and not the relevant authority considering the application.	All cases.	
Determination of Police or environmental health objection to a standard temporary event notice.	Where no agreement is reached and objection stands.	Where agreement is reached and objection is withdrawn.
Determination of Police or environmental health objection to a late temporary event notice.		All cases.
Determination of application to vary premises licence at community premises to include alternative licence condition.	If a Police objection.	All other cases.
Decision whether to consult other responsible authorities on minor variation application.		All cases.
Determination of minor variation application.		All cases.
Classification of Films.		All cases.
Re-classification of Films.		All cases.

- 23.8 In exceptional circumstances, whereby it is not possible or practical to hold a Licensing Sub-Committee hearing in person, to avoid having to defer hearings to a later date, the Royal Borough may opt to hold such hearings via remote means, for example via video conferencing. Such meetings will also be simultaneously broadcast via the Council's website or other social media platforms.

## **24 Early Morning Restriction Orders (EMROs)**

- 24.1 The Royal Borough does not currently operate an EMRO.
- 24.2 The power conferred on licensing authorises to make, vary or revoke an EMRO (or propose to take any of these steps) is set out in Sections 172A to 172E of the Licensing Act 2003. This power came into force on 31<sup>st</sup> October 2012 and the Government provided guidance as part of the s.182 Guidance to licensing authorities.
- 24.3 This power enables a Licensing Authority to prohibit the sale of alcohol for specified time periods between the hours of midnight and 06:00 hours in the whole or part of its area, if it is satisfied that this would be appropriate for the promotion of the licensing objectives.
- 24.4 EMROs are designed to address recurring problems such as high levels of alcohol-related crime in specific areas at specific times and serious public nuisance, and other instances of alcohol-related anti-social behaviour, which is not directly attributable to specific premises.
- 24.5 An EMRO:
- Applies to the supply of alcohol authorised by premises licences, club premises certificates and temporary event notices.
  - Applies for any period beginning at or after midnight and ending at or before 06:00 hours.
  - Does not have to apply on every day of the week and can apply for different time periods on different days of the week.
  - Applies for a limited or unlimited period (for example, an EMRO could be introduced for a few weeks to apply to a specific event).
  - Applies to the whole or any part of the Licensing Authority's area.
  - Will not apply to any premises on New Year's Eve (defined as midnight to 06:00 hours on 1<sup>st</sup> January every year).
  - Will not apply to the supply of alcohol to residents by accommodation providers between midnight and 06:00 hours, provided the alcohol is sold through mini-bars/room service.
  - Will not apply to a relaxation of licensing hours by virtue of an order made under Section 172 of the Licensing Act 2003.
- 24.6 Before the Royal Borough determines to recommend that the Full Council make a proposed EMRO, it should be satisfied that it has sufficient evidence to demonstrate that making the EMRO would be appropriate for the promotion of the licensing objectives. The requirement to take an evidence-based decision to promote the licensing objectives should enable the Royal Borough to draw on experience from other licensing decisions they make under the Licensing Act 2003. The Licensing Authority should consider evidence from partners, including responsible authorities and local community safety partnerships, alongside its own evidence, to determine whether an EMRO would be appropriate for the promotion of the licensing objectives.
- 24.7 An EMRO is a powerful tool which will prevent licenced premises in the area to which the EMRO relates from supplying alcohol during the time at which the EMRO applies. The Licensing Authority should consider whether other measures may address the problems that they have identified as the basis for introducing an EMRO. These measures might include:

- Introducing a cumulative impact policy.
- Reviewing licences of specific problem premises.
- Encouraging the creation of business-led best practice schemes in the area.
- Use of the new closure power in the Anti-Social Behaviour, Crime and Policing Act 2012. This new closure power can be used to protect victims and communities by quickly closing premises that are causing nuisance or disorder.

24.8 It is the intention of the Royal Borough to support businesses, whilst ensuring the promotion of the licensing objectives. However, where this has deemed to fail then an EMRO could be considered as a possible solution.

## **25 Late-Night Levy**

25.1 The Royal Borough of Greenwich does not currently operate a Late-Night Levy.

25.2 A Late-Night Levy enables licensing authorities to raise a contribution from late-opening alcohol suppliers towards policing the night-time economy. It is a local power that licensing authorities can choose whether or not to exercise. It must cover the whole of the Licensing Authority's area. However, the Licensing Authority will also choose the period during which the levy applies every night, between midnight and 6:00am, and decide what exemptions and reductions should apply from a list set out in regulations.

25.3 The aim of such a policy is to empower local areas to charge businesses that supply alcohol late into the night for the extra enforcement costs that the night-time economy generates for Police and licensing authorities.

25.4 If a Licensing Authority chooses to introduce the levy in their area, all licenced premises which are authorised to supply alcohol in the levy period will be affected. Premises that do not wish to operate in the levy period will be able to make a free minor variation to their licence before the levy is introduced.

25.5 So as not to unfairly penalise premises which are not part of the wider night-time economy, licensing authorities have the discretion to offer an exemption from the levy to the following categories of premises and schemes:

- Premises with overnight accommodation.
- Theatres and cinemas.
- Bingo halls.
- Community Amateur Sports Clubs (CASCs).
- Community premises.
- Country village pubs.
- Business Improvement Districts (BIDs).

***APPENDIX A – PREVENTION OF CRIME AND DISORDER***

1. The Licence holder shall install and maintain a comprehensive CCTV system as approved by the Metropolitan Police. All public areas of the licenced premises, including all public entry and exit points and the street environment shall be covered enabling facial identification of every person entering in any light condition. The CCTV system shall continually record whilst the premises is open for licensable activities and during all times when a member of the public is on the premises. All recordings shall be stored for a minimum period of 31 days with date and time stamping. Recordings shall be made available immediately upon the request of Police Officer, Police Community Safety Officer or authorised Local Authority Officer.
2. A staff member from the premises who is conversant with the operation of the CCTV system shall be on the premises at all times when the premises are open to the public and must be able to retrieve recorded footage and show to a Police Officer, Police Community Safety Officer or authorised Local Authority Officer upon request.
3. A personal licence holder shall be on duty and present on the premises at all times when the premises are open to the public for the sale or supply of alcohol.
4. No drinks, whether alcoholic or otherwise, shall be served in glass containers at any time.
5. Reusable polycarbonate/plastic drinks containers shall be used by all persons after (XX.00) hours; all alcoholic and 'soft' drinks shall be decanted by premises staff into such drink containers at the point of sale.
6. All alcoholic drinks sold for consumption off the premises shall be clearly labelled or marked with the name of the premises or the last four digits of the Premises Licence.
7. There shall be no sales of alcohol for consumption off the premises.
8. An Incident Register shall be kept at the premises, and made available promptly on request to any Police Officer, Police Community Safety Officer or authorised Local Authority Officer. The Register shall record the following:
  - all crimes reported to the venue
  - removal of all individuals from the premises
  - any complaints received
  - any incidents of disorder
  - all seizures of drugs or offensive weapons
  - any faults in the CCTV system or searching equipment or scanning equipment
  - any refusal of the sale of alcohol
  - any visit by a relevant authority or emergency service.
9. All exits doors shall be maintained to be easily operable without the use of a key, card, code or similar means and shall be regularly checked to ensure that they function satisfactorily and a record of the check shall be kept.

10. All sales of alcohol for consumption off the premises shall be in sealed containers only, and shall not be consumed on the premises.
11. No customers carrying open or sealed bottles shall be allowed to enter the premises at any time that the premises are open to the public.
12. All outside tables and chairs shall cease to be available for use by patrons from (XX.00) hours each day.
13. All tables and chairs shall be removed from the outside area by (XX.00) hours each day.
14. Notices shall be prominently displayed at all exits requesting patrons to respect the needs of local residents and businesses and to leave the area quietly.
15. Patrons permitted to temporarily leave and then re-enter the premises, e.g. to smoke, shall be limited to (XX) persons at any one time.
16. Notices shall be prominently displayed at any area used for smoking requesting patrons to respect the needs of local residents and use the area quietly.
17. A direct contact telephone number for the manager at the premises shall be publicly available at all times the premises is open and shall also be displayed on the premises website (if applicable). This telephone number is to be made available to residents and businesses in the vicinity.
18. Alcohol shall be covered up by an opaque curtain or blind so that it is not visible to members of the public during non-licensable hours.
19. No beer, lager or cider with an ABV of or above **6.5%** shall be sold at the premises, except for 'premium' product lines pre-agreed in writing with the Police and a ROYAL BOROUGH Licensing Officer in advance of such product being stocked. Copies of the written permission issued for the agreed 'premium' lines shall be kept at the premises and made available on request to the Police and other Officers of responsible authorities.
20. No single cans or bottles of beer, lager or cider shall be sold or supplied at the premises.
21. No more than 20% of the sales area of the premises shall be used at any one time for the sale, exposure for sale, or display of alcohol.
22. There shall be no self-service of spirits on the premises.
23. Prominent signage indicating the permitted hours for the sale of alcohol shall be displayed so as to be visible to customers before entering the premises, where alcohol is on public display, and at the point of sale.
24. The number of persons permitted in the premises at any one time (including staff) shall not exceed (X) persons.



25. The supply of alcohol at the premises shall only be to a person seated taking a table meal and for consumption as ancillary to their meal.
26. The supply of alcohol shall be by waiter or waitress service only.
27. Alcohol may be supplied and consumed by customers prior to their meal in the designated bar area, by up to a maximum at any one time of (XX) persons dining at the premises.
28. Substantial food and non-intoxicating beverages, including drinking water, shall be available in all parts of the premises where alcohol is sold or supplied for consumption on the premises.
29. No entertainment, performance, service, or exhibition involving nudity or sexual stimulation which would come within the definition of a sex establishment in Schedule 3 to the Local Government (Miscellaneous Provisions) Act 1982 as amended by the Greater London Council (General Powers) Act 1986 (whether or not locally adopted), shall be provided.
30. There shall be no striptease or nudity, and all persons shall be decently dressed at all times.
31. A written Code of Conduct for staff participating in the provision of striptease or nudity shall be in place, and shall be kept on the premises for inspection by Police or authorised Council officers at all times the premises are open to the public. Management shall ensure all staff are aware of the Code of Conduct and shall take all reasonable steps to ensure it is adhered to.
32. In relation to the specified Function Room there shall be no admission after (midnight) other than to
  - residents of the hotel and their bona fide guests (up to a maximum of four); or
  - persons attending the pre-booked function
33. All functions in the specified Function Room shall be pre-booked or ticketed events
34. Clear and prominent notices shall be displayed on the premises warning customers of the need to guard their property and to be aware of the operation of pickpockets, bag snatchers, etc. The notices shall advise customers to report concerns to the designated premises supervisor or the person in charge of the licensed premises.
35. Patrons permitted to temporarily leave and then re-enter the premises shall not be permitted to take any drinks or containers with them.
36. The use of the garden/outside area shall cease after *(insert time)* hours on *(insert days of the week)*.
37. Prior to any "designated sporting event" (as defined in the Sporting Events Control of Alcohol etc. Act 1985) the premises licence holder shall ensure that;
  - Alcohol sales in respect of cans of beer or cider are limited to no more than 4 cans per person during the preceding four hours before the commencement of the relevant designated sporting event;

- No sales of alcohol in bottles or glass containers shall be made in the period four hours of before the commencement of the designated sporting event;
  - Alcohol sales shall cease for a period of one hour immediately before the commencement of the relevant designated sporting event;
  - On any day when there is a relevant designated sporting event taking place, the premises shall not advertise or promote the availability of beer or cider within the locality to attract persons to the premises;
  - All members of staff working at the premises shall be informed of this condition prior to taking up employment;
  - On the day of the relevant designated sporting event, upon the direction of a Police Officer, using the grounds of the prevention of crime and disorder or public safety, the premises shall immediately cease to sell alcohol until further directed by the Police or until the relevant designated sporting event has finished.
38. As soon as possible, and in any event within 1 month from the grant of the Premises Licence, the Premises Licence holder shall join the local Pubwatch or other local crime reduction scheme approved by the Police.
39. Queuing outside the premises shall be restricted to a specified designated location. The queueing area shall be enclosed within appropriate barriers to ensure that the footway is kept clear and unobstructed. The Premises Licence holder shall ensure that the queue is orderly and supervised by SIA-registered door staff to ensure that there is no public nuisance or obstruction to the public highway.
40. The premises shall only operate as a restaurant in which:
- customers are shown to their table;
  - provides food in the form of substantial table meals that are prepared on the premises and are served and consumed at the table using non-disposable crockery;
  - does not provide any take away service of food or drink for immediate consumption; and
  - alcohol shall not be sold or supplied to, or consumed on, the premises otherwise than by persons who are bona fide taking substantial table meals and provided always that the consumption of alcohol by such persons shall be ancillary to taking such meals.
41. All external fire exit doors shall be fitted with sensor alarms and visible indicators to alert staff when the doors have been opened.
42. Reusable polycarbonate drink-ware or non-glass reusable or biodegradable containers shall be used by all persons after (XX.00) hours; all alcoholic and non-alcoholic drinks shall be decanted by premises staff into such drinks containers at the point of sale.
43. The Premises Licence holder shall have a written protocol in place manage intoxicated patrons and/or persons under the influence of illegal drugs. The protocol must also include procedures relating to the supply of illegal drugs and the 'spiking' of drinks.
44. Where rooms at the premises are let to individuals or groups for private hire, a hire agreement shall be in place that includes the conditions on the Premises Licence and clearly states the responsibilities of the hirer to ensure compliance with the conditions.

45. Where the premises are let to individuals or groups for private hire, a named person shall be responsible for ensuring that conditions of the Premises Licence are complied with. The named person shall provide his/her details to the Premises Licence holder in writing in advance of the event and their details shall be retained for a period of at least thirty-one days after the date of the event.
46. A written Security Policy shall be made available for inspection at all time on the premises. The Policy shall identify requirements such as:
  - a) The minimum number of supervisors
  - b) The displaying of name badges
  - c) The carrying of proof of SIA registration
  - d) The hours of operation and location of door staff
  - e) Whether at least one female supervisor should be available
  - f) Time arrived at and left the premises
47. A minimum of (X) SIA licensed door supervisors shall be on duty at the premises at all times whilst it is open to members of the public, at least one of whom shall be a female.
48. At least (2) SIA licensed door supervisors shall be on duty at the entrance of the premises at all times whilst it is open to members of the public.
49. A written Search Policy to prevent customers or staff bringing illegal drugs, weapons or other illegal items onto the premises at any time shall be in place and operate at the premises and shall be available for inspection by any Police Officer, Police Community Support Officer or authorised Local Authority Officer on request.
50. All persons entering or re-entering the premises shall be searched by an SIA trained member of staff in accordance with the premises written search policy. This may be by means of passing through a metal detecting search arch or wand or being physically searched in accordance with a procedure agreed with the Metropolitan Police, including a 'pat down search' and a full bag search, and monitored by the premises CCTV system.
51. All staff engaged outside the entrance to the premises, or supervising or controlling queues, shall wear high visibility yellow jackets or vests with their identification badges clearly visible.
52. "Clickers" or other devices shall be used by door staff to monitor the number of persons present on the premises at any one time.
53. A written Drugs Policy that details how the Premises Licence holder will prevent customers or staff bringing illegal drugs into the premises and procedures for dealing with any drugs found either on customers or within the premises shall be implemented at the premises.
54. There shall be a lockable 'Drugs Box' at the premises, access to which shall be restricted to (Police, Police and DPS) only. All controlled drugs (or items suspected to be or to contain controlled drugs) found at the premises shall be placed in this box as soon as practicable. Whenever this box is emptied, all contents must be removed by the Metropolitan Police for disposal.

55. Prominent signage stating that the premises operates a drugs policy and that an amnesty box is available shall be displayed prominently at all entrances.
56. There shall be no admittance or re-admittance of customers to the premises after (XX.00) hours.
57. An attendant shall be on duty in the cloakrooms during the whole time that it is in use.
58. The premises shall prominently display signage at all entrances informing customers that:
- All persons entering this premise shall be searched. Agreement to search is a condition of entry. If persons do not consent, entry shall be refused. Police may be called if drugs or weapons are found.
  - CCTV is in operation throughout this premises and is made available to the Police
  - Any person found carrying weapons or illegal drugs shall be permanently excluded and the Police will be informed
  - Management reserve the right to refuse entry
59. A currently qualified first aider shall be employed on the premises at all times that the premises are open to the public. The venue shall provide sufficient first aid facilities commensurate with the type of event and capacity of the premises.
60. The premises shall install and maintain a computer-based identification entry system. The details of all persons, including staff are to be passed through the system prior to being permitted entry to the premises. The provision and maintenance of such equipment shall be to the reasonable satisfaction of Metropolitan Police Service. The details of persons recorded by the system shall be made available to Police upon reasonable request for the purpose of preventing and detecting crime. The data retained shall be managed in accordance with the General Data Protection Regulations and the Data Protection Act 2018 or any re-enactment thereof
61. The Premises Licence holder shall employ SIA registered security personnel for all events. External promoters shall not be permitted to use their own security personnel.
62. The Premises Licence holder shall employ SIA registered security personnel provided by an operator that is part of the SIA's Approved Contractor Scheme.
63. A register of security personnel employed on the premises shall be maintained in a legible format and made available to Police upon reasonable request. The register should be completed by the DPS/duty manager/ nominated staff member at the commencement of work by each member of security staff and details recorded should include;
- Full name;
  - SIA badge number; and
  - time duties commenced and ceased.
- The security operative shall sign their name against these details.
64. At the commencement of work security personnel should ensure that they are recorded on the CCTV system and that a clear head and shoulders image showing their face clear of any hat, non-glass reusable or biodegradable containers or other obstruction is recorded.

65. A written Dispersal Policy shall be in place and implemented at the premises to move customers from the premises and the immediate vicinity in such a way as to cause minimum disturbance or nuisance to neighbours. The Dispersal Policy shall be available to be inspected by any Police Officer, Police Community Support Officer or authorised Local Authority Officer upon request.
66. The licence holder shall maintain a Register of all employees, including relatives, working at the premises. The register shall be made available upon demand to a Police officer, an immigration officer, or an authorised officer of the Licensing Authority.
67. The Register of Employees shall record the following information for each employee:
- a. Full name of employee;
  - b. A copy of the Passport photograph page or National Identity Card photograph;
  - c. Date employment commenced;
  - d. Date employment ended;
  - e. Eligibility to work in the UK by inspection of passport and originals of the right to work in the UK documents;
  - f. Evidence of the right to work in the UK;
  - g. Signature of the Premises Licence Holder to confirm the documents inspected and date of inspection;
  - h. Signature of employee to confirm documents inspected by the licence holder and date of inspection
  - i. The employee's residential address.
68. The premises licence holder will monitor its primary use through a methodology and collection of monthly data (such as transactional or footfall data) agreed with the Licensing Authority. Where this data shows that primary use of the premises is that of a garage, the sale of alcohol shall be immediately suspended until such time that the data suggests primary use is no longer that of a garage. At least six months of data will be retained and made available for inspection by the Licensing Authority on request.

## ***APPENDIX B – PUBLIC SAFETY***

When applicants for premises licences or club premises certificates are preparing their operating schedules and the Royal Greenwich and other Responsible Authorities are considering such applications, the following options should be considered as measures to promote public safety. These options should also be considered following the receipt of relevant representations from a Responsible Authority or any other persons.

### **Escape routes**

To achieve the public safety objective it may be necessary to include conditions relating to the maintenance of all escape routes and exits, including external exits. This can be ensured by keeping the exits unobstructed and in good order of repair. The exits shall comply with the Building Regulations in force at the time of construction. All floor surfaces shall be even and constructed of non-slippery materials. The surfaces shall be free of slip and trip hazards or floor contamination, however, if any floor contamination is identified, it must be clearly marked while it is being removed. In restaurants and other premises, where chairs and tables are provided, this will also include ensuring that the gangways are kept unobstructed.

Consideration should be given to the following matters listed below:

- All emergency exit doors should be easily opened without the use of a key, card, code or similar means;
- Doors at such exits should be regularly checked and maintained to ensure that they function satisfactorily. A written record of these checks should be kept at the premises and made available for inspection by any authorised officers;
- Any removable security fastenings are removed whenever the premises are open to the public or occupied by staff;
- Where necessary the edges of the treads of steps and stairways should be conspicuous from the rest of the stair treads;
- Where an inward opening door or shutter is permitted on an escape route and is required to be kept open, a sign shall be provided on or adjacent to the door or shutter worded, "Secure door/shutter must be kept open when the premises are occupied" in lettering of 5mm minimum height. (Circular sign, colour blue with white text).

### **Safety Checks**

Consideration shall be given to the conditions to ensure that:

- The safety checks are carried out before the admitting the public; and
- Details of such checks are recorded, accessible and can be made available to relevant Council's officer on request.

### **Evidence of Maintenance**



Consideration shall be given to the conditions to ensure that:

- The safety of equipment and installations at the premises must not pose any risk to any persons at the premises. This can be proven by the presence of certification for any permanent or temporary electrical supply, emergency lighting, or emergency warning system.

### **Flame Retardant Materials**

Consideration shall be given to the conditions to ensure that:

- The hangings, curtains and temporary decorations are flame retardant and are maintained in this condition;
- All seating and furnishings, including the upholstered seating and bean bags, pass the appropriate testing criteria.

### **Capacity limits**

Consideration shall be given to conditions to ensure that the following arrangements listed below are made:

- That any capacity limit imposed under the premises licence or club premises certificate is not exceeded; and
- That any capacity limit detailed in the premises' Fire Risk Assessment is not exceeded; and
- The licence holder, a club official, manager or a designated premise supervisor is aware of the number of people present at the premises at any given time and is able to provide this information to any authorised person on request.

### **Emergency action notices**

Consideration shall be given to conditions ensuring that notices and signage detailing the actions to be taken in the event of emergencies, including how the emergency services should be summoned, are prominently displayed inside the premises and protected from damage and deterioration.

### **Access for emergency vehicles**

Access for emergency vehicles must be kept clear and free from obstruction at all times.

### **First Aid**

Consideration shall be given to conditions to ensure that:

- Adequate and appropriate supply of first aid equipment and materials must be available at the premises at all times;
- At the premises, there will be a sufficient number of suitably trained competent first aiders, as identified in the premises' First Aid needs assessment. The duties of all first aiders shall be clearly defined.

## **Lighting**

Consideration might be given to conditions to ensure that:

- In the absence of adequate daylight, the lighting in any area accessible to the public, members or guests shall be fully operational at all times;
- Emergency lighting installation has not been altered;
- Emergency lighting and signage are in good working order before the admission of the public, members or guests; and
- In the event of the failure of standard lighting, where the emergency lighting battery has a capacity of one hour, arrangements are in place to ensure that the public, members or guests can leave the premises within 20 minutes unless within that time standard lighting has been restored and the battery is being re-charged. If the emergency lighting battery has a capacity of three hours, the appropriate period by the end of which the public should have left the premises is one hour.

## **Temporary electrical installation**

Consideration should be given to the safety of the public at all licensed premises by ensuring that:

- Temporary electrical wiring and distribution systems are installed and regularly inspected by a competent person;
- These systems comply with the appropriate legal requirements;
- All temporary electrical wiring and distribution systems are inspected and certified by a competent person prior to use.

## **Indoor sports entertainment**

Subject to the type of sports provided and the appropriate risk assessments supplied by the premises license holder, consideration shall be given to conditions to ensure that:

- A suitably qualified medical practitioner is present throughout a sports entertainment event, involving boxing, wrestling, judo, karate or other contact sports entertainment;
- Where a ring is used, it is constructed of and supported by suitable materials. A competent person must inspect the ring at prescribed intervals. Any material used for the construction of the skirt around the ring is flame-retardant;
- During any wrestling or other type of similar entertainment the nearest seating that members of the public may must be further than 2.5 meters away from the edge of the ring; and
- Where water sports entertainment is provided, staff adequately trained in rescue and life safety procedures shall be stationed and remain within the vicinity of the water at all material times (see also Managing Health and Safety in Swimming Pools issued jointly by the Health and Safety Commission and Sport England).

## **Special effects**

The use of special effects in venues of various types may present significant risks. Any special effects or mechanical installations should be arranged and stored to minimise any risk to the safety of the audience, the performers and staff. Special effects to be considered include:

- Dry ice machines and cryogenic fog;
- Smoke machines and fog generators;
- Pyrotechnics, including fireworks;
- Real flames;
- Firearms;
- Motor vehicles;
- Strobe lighting;
- Lasers;
- Explosives and highly flammable substances.

In certain circumstances, it may be necessary to require that certain special effects are only used with the prior notification to, and the approval of the appropriate authority.

### **Theatres, cinemas, concert halls and similar places**

In the context of public safety, there are matters that need to be considered in theatres and cinemas. The conditions must be appropriate, relevant and established through risk assessment and evaluation process. The establishments should avoid using standardised conditions and should consider the below listed points:

- There must be a sufficient number of attendants employed. Consideration should be given to other safety measures, such as the design of the premises and the profile of the audience (e.g. performances attracting primarily children). Attendants should be evenly distributed throughout all parts of the premises to which the public have access, so they can observe the entire premise.
- Standing and sitting in gangways, in front of any exits, on staircases and landings should not be permitted, except for accessing the seat(s) only;
- Standing to view the performance except in areas designated in the premises licence or club premises certificate;
- All drinks can only be consumed out of containers made of paper or non-glass reusable or biodegradable materials;
- No flammable films to be allowed at the premises without the prior approval of the Fire Brigade.

### **Public Safety Model Conditions**

1. The number of persons permitted in the premises at any time (including staff) shall not exceed (x) persons.
2. The occupancy shall be restricted to (insert number) persons in the premises. (Limits may also be appropriate for different rooms or floors of premises). The total occupancy figure includes staff, performers and public. The premises licence holder shall ensure that there are appropriate

management controls to ensure that the occupancy figure is not exceeded at any time. Appropriate controls shall be put in place to ensure that the occupancy numbers of the premises/specified areas are not exceeded at any time.

3. Adequate procedures must be implemented to ensure that overcrowding, such as that which may cause injury through crushing, does not occur in any part of the premises at any given time.
4. The licence holder shall determine the occupant capacity of the premises based on the recorded Risk Assessment(s).
5. The Risk Assessments must take into account all relevant factors including the type and nature of the event, space, audience density, means of access and egress, toilet provision, load bearing capacity of floors, ventilation. etc. Risk Assessments must be reviewed regularly, and especially if any circumstances change.
6. Where necessary separate occupancy levels must be set for the different parts of the premises, and when necessary for different premises' layouts and different types of events.
7. Measures must be put in place to ensure that the capacity is not exceeded at any time. These measures should be documented.
8. All documentation relating to the proposed capacity limit of the numbers of persons at the premises, must be kept at the premises and must be available for sighting to any authorised officer of the Royal Borough or the Police.
9. The premises' licence holder shall regularly review, update and amend all Risk Assessments, particularly following any changes to the layout or operation of the venue. Such reviews should be fully documented and form an integral part of the risk assessment.
10. Manual (and/or automatic) electronic number control systems shall be installed, used and maintained at the premises always when the premises are open to the public.
11. Any special effects or mechanical installations shall be arranged and stored to minimise any risk to the safety of those using the premises. Where there is no previous consent The following special effects listed below are subject to 10 days prior notice being provided to the Licensing Authority for approval:
  - Dry ice and cryogenic fog;
  - Smoke machines and fog generators;
  - Pyrotechnics, including fireworks;
  - Firearms.
12. The approved arrangements at the premises, including means of escape provisions, emergency warning equipment, the electrical installation and mechanical equipment, shall at all material times be maintained in good condition and full working order.

13. The routes of escape from the premises need to be maintained unobstructed and free from slip and trip hazards. They must be immediately available and clearly identified in accordance with the premises layout plans provided.
14. All emergency exit doors shall be accessible and unobstructed at all material times without the use of a key, code, card or similar means.
15. All emergency doors shall be maintained effectively, be self-closing and not held open other than by an approved device.
16. The edges of steps and stairways shall be maintained in good order and be conspicuous.
17. Curtains and hangings shall not obstruct emergency safety signs or emergency equipment.
18. All fabrics, curtains, drapes and similar features, including materials used in finishing and furnishing shall either be non-combustible or be durably or inherently flame retardant fabric. Any fabrics used in escape routes (other than foyers), entertainment areas or function rooms, shall be made out of non-combustible fabrics.
19. The certificates of any permanent or temporary features listed below shall be submitted to the Licensing Authority upon a written request:
  - Emergency lighting battery or system;
  - Electrical installation;
  - Emergency warning system;
20. The licence shall have no effect until the capacity of the premises has been assessed and agreed upon by relevant Responsible Authorities.
21. The licence will come into effect after a Fire Risk Assessment has been undertaken and implemented.
22. The number of persons accommodated at the premises (excluding staff) shall not exceed (insert number). The numbers and types of sanitary conveniences should be agreed between the Licensing Team, Responsible Authority and the licence holder.
22. An appropriately qualified medical practitioner shall be present throughout sports entertainment events, such as boxing, wrestling, judo, karate or other sports entertainment of a similar nature.
23. Any ring constructed for boxing, wrestling or a similar contact sport shall be constructed, maintained and inspected by a competent person.
24. At any boxing, wrestling or sports entertainment of a similar nature, members of the public shall not occupy any seat within 2.5 metres of the edge of the ring.
25. At water sports entertainment, an appropriate number of staff adequately trained in rescue and lifesaving procedures shall be stationed and remain near the water body at all material times.

***APPENDIX C – PREVENTION OF PUBLIC NUISANCE***

The following conditions should be considered in order to adhere to the Prevention of Public Nuisance licensing objective. This list is not exhaustive, and measures should be taken individually and dependent on the needs and requirements of each premises, location, staff and clientele. The following conditions may be added as conditions on the licence by the Royal Borough of Greenwich if deemed necessary for the promotion of the licensing objective:

1. Notices shall be prominently displayed at all exits, requesting the public to respect the needs of residents and to leave the premises and the area quietly.
2. External doors and windows to the premises shall be kept closed whilst regulated entertainment is taking place, except for access & egress.
3. A noise limiting device shall be installed for all music systems within the premises. The noise limiting device shall be calibrated by an independent qualified acoustic consultant to ensure inaudibility in all nearby noise-sensitive premises (if access to such premises is possible) or, alternatively, at the façade of nearby noise-sensitive premises, and a certificate of compliance shall be submitted to the Royal Borough of Greenwich Environmental Health Pollution team. The device shall be controlled by the premises licence holder and maintained in a locked, tamper-proof box.
4. Music shall not be permitted to be played outside the premises and any music played from within should be inaudible at the facade of the nearest noise-sensitive premises.
5. All speakers should be suitably isolated from the premises' structure by means of isolation/acoustic mounts. Speakers should face away from all entrances and exits.
6. A scheme of sound insulation between the proposed licenced premises and existing residential shall be submitted to, and approved by, the Royal Borough of Greenwich Environmental Health Pollution team. The approved scheme shall be installed prior to any licensable activities taking place and retained for the duration of the licence.
7. An acoustic lobby shall be provided inside all entrances and it should be of such a size as to ensure that the lobby door and entrance door need not be opened at the same time to permit access and egress.
8. The premises licence holder shall arrange for regular checks to be made outside the premises to ensure that noise from inside, or from its patrons, is not adversely affecting neighbouring residential properties. A log of these checks shall be maintained by the premises licence holder or a duly appointed person and produced to the Police and/or an officer of the local authority on demand.
9. Amplified music and voices shall be inaudible one metre from the façade of all noise-sensitive premises.



10. There shall be no admittance or re-admittance to the premises after XX:XX hours.

**External Areas**

11. All outside tables & chairs shall be removed, or rendered unusable for customer use, by XX:XX hours each day.
12. Patrons permitted to temporarily leave & re-enter the premises shall be limited to (XX) persons at any one time.
13. Patrons permitted to temporarily leave and then re-enter the premises shall not be permitted to take drinks or drinks containers outside with them.
14. Patrons shall not be permitted to take drinks or drinks containers outside after XX:XX hours.
15. Patrons shall not be permitted to take drinks or drinks containers outside of the premises at any time.

***APPENDIX D – PROTECTION OF CHILDREN FROM HARM***

The following conditions should be considered in order to adhere to the Protection of Children from Harm licensing objective. (This list is not exhaustive and measures should be taken individually and dependent on the needs and requirements of each premise, location, staff and clientele). The following conditions may be added as conditions on the licence by the Royal Borough of Greenwich if deemed necessary to for the promotion of the licensing objective:

1. The Challenge 25/Think 25 or contemporary equivalent proof of age scheme shall be operated at the premises. All customers who appear under the age of 25 will be challenged to prove that they are over 18 when attempting to purchase alcohol. Acceptable forms of ID include a photo driving licence, passport, or home office approved identity card bearing the holographic 'PASS' mark. If the person seeking alcohol is unable to produce an acceptable form of identification, no sale or supply of alcohol shall be made to or for that person.
2. All staff shall be trained in the law about the sale of alcohol. Such training will include challenging every individual who appears to be under 25 years of age and to refuse service where individuals cannot produce acceptable means of identification, acceptable forms of ID and using the refusal register. Such training (including any refresher training) will be logged and provided not less than every twelve/six/three months. The training log shall be made available for inspection by Police and "authorised persons" immediately upon request.
3. A refusals log shall be kept at the premises, and made immediately available on request to the Police or an "authorised person". The refusals log is to be inspected on a monthly basis by the DPS and noted in the log; and a record made in the log of any actions that appear to be needed to protect young people from harm. The log must record all refused sales of alcohol and include the following:
  - a. the identity of the member of staff who refused the sale;
  - b. the date and time of the refusal;
  - c. the alcohol requested and reason for refusal; and
  - d. description of the person refused alcohol.
4. The following posters, or contemporary equivalent shall be displayed conspicuously on the premises in customer facing areas:
  - a. 'Think 25' to advise potential purchasers that suitable proof of age will be required for all purchasers who appear to be under 25.
  - b. 'It's A Crime' intended to warn adults not to buy alcohol for those under 18 years-of-age.
  - c. Any updated and relevant posters which highlight child protection and safeguarding measures as given by Police and "authorised persons".
5. All staff shall be trained in Child Protection Awareness. Such training will include awareness around Neglect, Emotional & Physical Abuse, Child Criminal Exploitation and Child Sexual Exploitation as well as using the Safeguarding Log. Such training (including any refresher training) will be logged and provided not less than every twelve/six/three months. The training log shall be made available for inspection by Police and "authorised persons" immediately upon request.

6. A Safeguarding Log, or Safeguarding Section within the incident book, shall be kept at the premises, and made immediately available on request to the Police or an "authorised person". The safeguarding log will be inspected on a monthly/quarterly/annual basis by the DPS and noted in the log; and a record made in the log of any actions that are required to protect young people from harm. The log must record all concerns raised with regards to safeguarding and include the following:
  - a. the identity of the member of staff who raised the concern;
  - b. description of the concern raised including details relating to the young person; and
  - c. the action, and justification for such action, undertaken by the member of staff when the concern was raised. Where no action is undertaken, a justification for this shall be required.
7. The following posters, or those of a similar nature, shall be displayed conspicuously on the premises in customer facing areas:
  - a. 'Neglect Matters' or similar poster to raise awareness of neglect with staff and customers; 'Operation Makesafe', or similar poster intended to advise of the action to be taken if someone should spot signs of CSE; and
  - b. Any updated and relevant posters which highlight child protection and safeguarding measures as given by Police and "authorised persons".
8. All staff that may come into regular contact with children and young people shall be subject to a DBS (or equivalent) check.
9. There shall be a Safeguarding Lead for the site and all staff shall report concerns around safeguarding to the designated person in addition to recording in the safeguarding log.

**APPENDIX E – OUTDOOR EVENTS (PUBLIC SAFETY)**

**General Safety Management**

1. The final draft of the Event Management Plan (EMP), Risk Assessments (RA) and Contractor Risk Assessments must be submitted to the Royal Borough of Greenwich (RBG) Entertainment and Licensing Safety Advisory Group (SAG) for approval at least 28 days prior to the commencement of the event. Once approved, the Licensee must implement the EMP and associated RAs for the duration of the event. Further on in this document the 'Licensee' will also be referred to as the 'Premises Licence Holder' on interchangeable basis.
2. The Licensee shall abide by any further conditions set out by the RBG Entertainment and Licensing SAG.
3. Membership of the RBG Entertainment and Licensing SAG will include as a minimum, the Licensee, the event holder, the Licensing Authority, Environmental Health (Pollution), Environmental Health (Health & Safety), Communications Department, Highways Department, the Metropolitan Police, the London Ambulance Service and the London Fire & Emergency Planning Authority.
4. A Crowd Management Plan (CMP) shall be submitted to the RBG Entertainment and Licensing SAG 28 days prior to the event. The CMP will detail how the Licensee intends to manage the crowd to ensure that the capacity of the event site and of the tented structures is not exceeded. The CMP must clearly show the proposed locations of all structures, stalls, facilities, stewarding positions, entrances and exits.
5. The premises shall be maintained in accordance with the plan annexed to the Premises Licence and licensable activities shall only take place in those areas designated on the annexed plan.
6. Unless otherwise agreed, no later than 28 days prior to the event the Premises Licence holder must present the EMP to the RBG Entertainment and Licensing SAG for their comments and advice. The Event Management Plan (EMP) shall include, as a minimum:
  - a. Emergency and evacuation procedures;
  - b. Crowd management and stewarding arrangements;
  - c. A detailed plan showing site layout and emergency egress points;
  - d. A detailed sustainability management plan, including waste, energy and water minimisation and disposal.
  - e. Emergency/pandemic situations, such as Coronavirus COVID-19.
7. The Premises Licence Holder must ensure that the event is run in accordance with the EMP.
8. The Premises Licence Holder shall ensure that Risk Assessments are regularly produced for the events, and these shall be made available to the Environmental Health (Health and Safety) no less than 28 days before the event.

9. The Premises Licence Holder must nominate one person for the event to act as safety co-ordinator. This person must be authorised by the Premises Licence Holder to act on their behalf to ensure that the reasonable requests made by RBG Entertainment and Licensing SAG are carried out.
10. The Premises Licence Holder must notify the RBG Entertainment and Licensing SAG of the nominated safety co-ordinator details.
11. A communication system must be provided to ensure the effective operation of the site under both normal and emergency evacuation conditions. The Premises Licence Holder must provide an adequate incident control centre and a rendezvous point for the Police and other emergency services.

### **Structures**

12. The plan containing sightings of all structures, stalls, facilities, entrances and exits shall be submitted with the application and approved by the RBG Entertainment and Licensing SAG.
13. Stages, roof structures and any other temporary or special structures shall be of adequate strength and stability, both in service and in construction. They shall be assembled in accordance with plans, calculations and specifications drawn up by a competent designer. Details of the construction of these structures together with any necessary calculations must be submitted for approval under the Section 30 of the London Building Act 1939 to the RBG Building Control Department. Failure to provide this information may result in Premises Licence Holder being unable to erect and/or use the structure for the event.
14. Full structural design details and calculations of all and any structures proposed to be erected within the licensed area, must be submitted to the RBG Building Control Department. A certificate issued by a competent person or engineer verifying that the completed structure has been erected in accordance with the structural drawings. Design specification must be available for inspection prior to that structure being put in use during the licensed event.
15. Any moving flown equipment must contain a device or method whereby a failure in the lifting system would not allow the load to fall. All hung scenery and equipment must be provided with a minimum of two securely fixed independent suspensions, so that in the event of failure of one suspension the load would be safely sustained.
16. Where appropriate, capacities will be set for any temporary structures in accordance with the Technical Standards for Places of Entertainment and agreed in writing with relevant Responsible Authorities.
17. Details, such as locations of emergency exits and signage, fire warning and fire fighting equipment, within all marquees, tented structures and temporary structures should be provided.

### **Fire Safety & Emergency**

18. All fabric, including furnishings, curtains, drapes and other items of scenery used on stage, as well as materials used for the construction of tents and marquees, or plastic and weather sheeting, shall be flame retardant and meet the relevant British Standards. Certificates of Compliance must be available upon request by the RBG Entertainment and Licensing SAG.
19. The Premises Licence Holder must maintain a regular safety patrol at all times when the public are present in the licensed area to check for and guard against possible emergency hazards. The area underneath the stage must be kept clear. Flammable materials must not be stored under the stage or in the proximity of it.
20. Emergency exits and entrances to the event area must be kept clear at all times and must be provided with clearly visible emergency signage.
21. The amount of diesel fuel stored for the generators shall not exceed the amount required for the event. The diesel fuel should be stored in an enclosed space away from the public. Authorised personnel only may only access it.
22. Petrol fuelled generators are not permitted on the event site.
23. All generators and cooking facilities shall be stored in a guarded area away from the public. Authorised personnel only may access it. Appropriate means of fire extinguishing must be provided.
24. A schedule detailing types and locations of emergency equipment must be submitted to the RBG Entertainment and Licensing SAG.

### **Crowd Management**

25. The licensee must ensure that the Egress Management Plan is presented to and agreed by the RBG Entertainment and Licensing SAG no later than 28 days prior to the commencement of the event. Please note: The Egress Management Plan may require the closure of \*\*\*\*\* area or other surrounding roads with the approval of the relevant authorities.
26. The licensee will provide adequate means of control to ensure that only permitted numbers of persons gain access to the event site and that the capacity of the site is not exceeded.
27. The licensee will provide suitable rigid barriers or fences around the stage and any other locations where the crowd density needs to be controlled to ensure the safety throughout the event site. The barriers will be subject to loading and designed to withstand right-angle and parallel loads in line with probable crowd pressure
28. The licensee, as agreed by the RBG Entertainment and Licensing SAG, shall engage sufficient numbers of competent stewards. During the event, all parties shall communicate using two way radios. A minimum of one radio per two stewards shall be provided. All stewards would have been briefed on their duties and actions in the event of an emergency. All stewards must wear jackets or tabards that readily identify them as such; and shall be at least 18 years old.



29. Any queue formed outside the premises shall be stewarded at all times to minimise any disturbance to the neighbourhood.

### **Special Effects**

30. Any special effects or mechanical installations shall be arranged and stored to minimise any risk to the safety of those using the premises. Where consent has previously not been given, the following special effects will only be used on 10 days prior notice being given to the Licensing Authority and Environmental Health (Health and Safety):
- dry ice and cryogenic fog;
  - smoke machines and fog generators;
  - pyrotechnics, including fireworks;
  - firearms;
  - lasers;
  - explosives and highly flammable substances;
  - real flame;
  - strobe lighting.
31. A written notice shall be given to the Licensing Authority and the Environmental Health (Animal Health) no later than 28 days prior to the event of any performances that include animals.

### **Welfare**

32. Sanitary conveniences and the points of drinking water, information, first aid and fire must be signposted using legally compliant signage. The licensee shall provide a sufficient number of signs visible from all parts of the event site lettering on the signage shall be at least 225 mm high. A sufficient number of signage that is visible from all parts of the event site should be provided.
33. The licensee must provide adequate numbers of sanitary accommodation for the duration of the event, including build up and break down. The sanitary conveniences must be maintained to the standards contained within the Health and Safety Executive's (HSE) Event Safety Guide (Guide to Health, Safety and Welfare at Pop Concerts and Similar Events-HSG 195). Suitable arrangements must also be made for the collection and disposal of used hand towels, sanitary towels and other refuse from the sanitary accommodation points.
34. There shall be a welfare point for the reporting and management of lost children. The welfare point will be staffed by trained (and appropriately checked by the Disclosure and Barring Service (DBS)) staff who will be in constant radio contact with the event manager/head steward and the event safety co-ordinator.
35. The suitable medical and first aid facilities and staff shall be provided in line with the HSE "Events Safety Guide" (HSG195).

### **Electricity and Fuel**

36. The electrical supply will comply with:

- BS7909 2011 – Code of Practice for Temporary Distribution System for AC Electrical Supplies for Entertainment Lighting Technical Services and Related Purposes;
  - BS7430 2011 – Code of Practice for Earthing;
  - BS 7671 2008 – Requirements for Electrical Installations;
  - Socket outlets for use with hand held temporary or portable electrical equipment on the stage or performance areas(s) shall be of the type protected by a Residual Current Device (RCD) having a 30mA tripping current;
  - All portable electrical equipment shall be PAT tested and marked accordingly;
  - High-energy efficiency lighting must be used, with an energy rating of A or above, unless otherwise agreed by the RBG Entertainment and Licensing SAG.
37. Electrical generators, where used during the event, must be:
- a. Suitably located clear of buildings, marquees and structures and away from any flammable materials;
  - b. Enclosed and accessed by authorised personnel only;
  - c. Able to provide power;
  - d. Provided with back up electrical generators that comply with relevant standards to power essential communications, lighting and safety systems in the event of primary generator failure, unless otherwise agreed by the RBG Entertainment and Licensing SAG;
38. The Premises Licence Holder must ensure that a sufficient number of competent persons is employed to assess the electrical requirements at the site and the compatibility of the electricity supply with the equipment to be used throughout the event. Appropriate safety devices (such as 30mA Residual Current Devices at source) must be used for electrical apparatus, particularly for any electrical equipment exposed to adverse conditions or electrical equipment to be used in association with any hand held devices (e.g. microphones). The electrical installation certificate of inspection, carried out by a competent person should be made available for inspection.
39. Electrical cables in the public arena must be protected by proprietary cable ramps or suspended at least 2.4m above ground level (5.8m where passing over a possible vehicle route). In the areas that public do not access, cables may be covered with rubber matting.
40. All spare fuel, including LPG, must be stored safely in accordance with relevant Health and Safety legislation. Suitable safety signage and fire fighting equipment shall be provided in the close proximity of this storage.
41. Suitable barriers shall be provided around all stage, generators, mechanical plant, non-public areas and exposed edges.
42. Petrol fuelled generators will not be permitted at the event site.
43. All generators and cooking facilities shall be suitably guarded and located in the areas accessible to the authorised personnel only. Appropriate fire extinguishers shall also be provided.

## Lighting

44. All parts of the licensed area must be adequately lit (day or artificial light). All safety signage shall be suitably illuminable. Details of the locations and level of illumination must be submitted to the RBG Entertainment and Licensing SAG at least 28 calendar or working days prior to the event commencing.
45. All additional and temporary lighting must be positioned safely and suitably guarded.

#### **General**

46. The Premises Licence Holder will comply with the reasonable requirements of all relevant Responsible Authorities.
47. Only emergency vehicles may access the site during the event.
48. Authorised enforcement officers of the Licensing Authority and from the Responsible Authorities, such as Environmental Health, Metropolitan Police and London Fire Brigade, must be provided with the security passes for full and free access to the event site at all times.
49. Alcohol will only be served for consumption on the premises in open plastic or paper receptacles or a environmentally sustainable alternative.
50. The applicant shall ensure that any intoxicated event attendees would not be allowed to enter the event site, will not be served any alcohol and may be asked to leave.
51. A personal licence holder working under the DPS shall supervise each alcohol-selling outlet. All staff must be suitably trained.

***APPENDIX F – OUTDOOR EVENTS (PREVENTION OF PUBLIC NUISANCE)***

A large temporary event which cannot be authorised under a Temporary Event Notice due to the numbers of persons attending will generally be licenced under a time-limited Premises Licence lasting for the duration of the event. Where regulated entertainment is included, the Council will set noise limits in line with The Noise Council's "Code of Practice on Environmental Noise Control at Concerts"; other guidelines; and recommended noise control procedures. With regard to the prevention of Public Nuisance, the applicant is strongly advised to submit a draft Event Management Plan (EMP) prior to submitting a full application. The EMP should set out how the applicant intends to promote the prevention of public nuisance licensing objective and consideration should be given to the inclusion of the conditions set out below.

1. The premises shall not be used for licensable activities under the terms of this premises licence until an appropriate Noise Management Plan (NMP) has been approved by the Royal Borough of Greenwich Environmental Health Pollution team. Thereafter, Regulated Entertainment Events falling within the ambit of the NMP must be conducted in accordance with the terms of that Plan. Nothing in this condition shall prevent Environmental Health and the premises licence holder from agreeing amendments to the NMP, from time to time, in order to promote the licensing objectives and/or due to the operational needs of the premises.
2. Music noise levels during soundchecks and the event shall not exceed XX dB(A) Laeq15min at one metre from the façade of any noise-sensitive premises. The XX dB(A) limit applies to all frequencies. A competent person with access to a suitable Type 1 or Type 2 sound level meter shall be available to check noise levels at the façade of the nearest noise-sensitive property.
3. Fourteen (14) days prior to the event, the applicant should write to all surrounding residents giving full event details. The letter must include a contact telephone number for the event management on the day. This telephone line must be manned for the duration of the event. A written record of all noise complaints shall be kept and submitted to the Royal Borough of Greenwich Environmental Health Pollution team no later than seven (7) days after the event.
4. All activities associated with the build and breakdown which are audible outside the site boundary shall only take place between the following hours:  
Monday to Friday - 8:00am to 6:00pm;  
Saturday - 8:00am to 1:00pm;  
and at no time on Sundays or bank Holidays.

The Royal Borough would look to an emphasis by event organisers to promote sustainability grounds, e.g. a move away from "plastic" drinks containers and the avoidance of glass in favour of non-glass reusable or biodegradable drinkware.

In line with other applications of this nature, we adhere to the recommendations contained in the "Code of Practice on Environmental Noise Control at Concerts". The following table lays out the Music Noise Levels (MNL) recommended by the code.

As this venue falls into the category of “Urban Stadia or Arenas” / “Other Urban or Rural Venue” / “All Venues”, then we would recommend the MNL be restricted in line with these recommendations. Any events that exceed the maximum number of twelve (12) per annum shall not be audible at the nearest noise-sensitive premises.

<b>Concert days per calendar year, per venue</b>	<b>Venue Category</b>	<b>Guideline</b>
1 to 3	Urban Stadia or Arenas	The MNL should not exceed 75dB(A) over a 15-minute period.
1 to 3	Other Urban and Rural Venues	The MNL should not exceed 65dB(A) over a 15-minute period.
4 to 12	All Venues	The MNL should not exceed the background noise level by more than 15dB(A) over a 15-minute period.

# Analysis of Alcohol-Related Crime and Anti-Social Behaviour Within Cumulative Impact Zones in the Royal Borough of Greenwich

May 2020

Data contained within this report should not be shared without the prior permission of the report author.

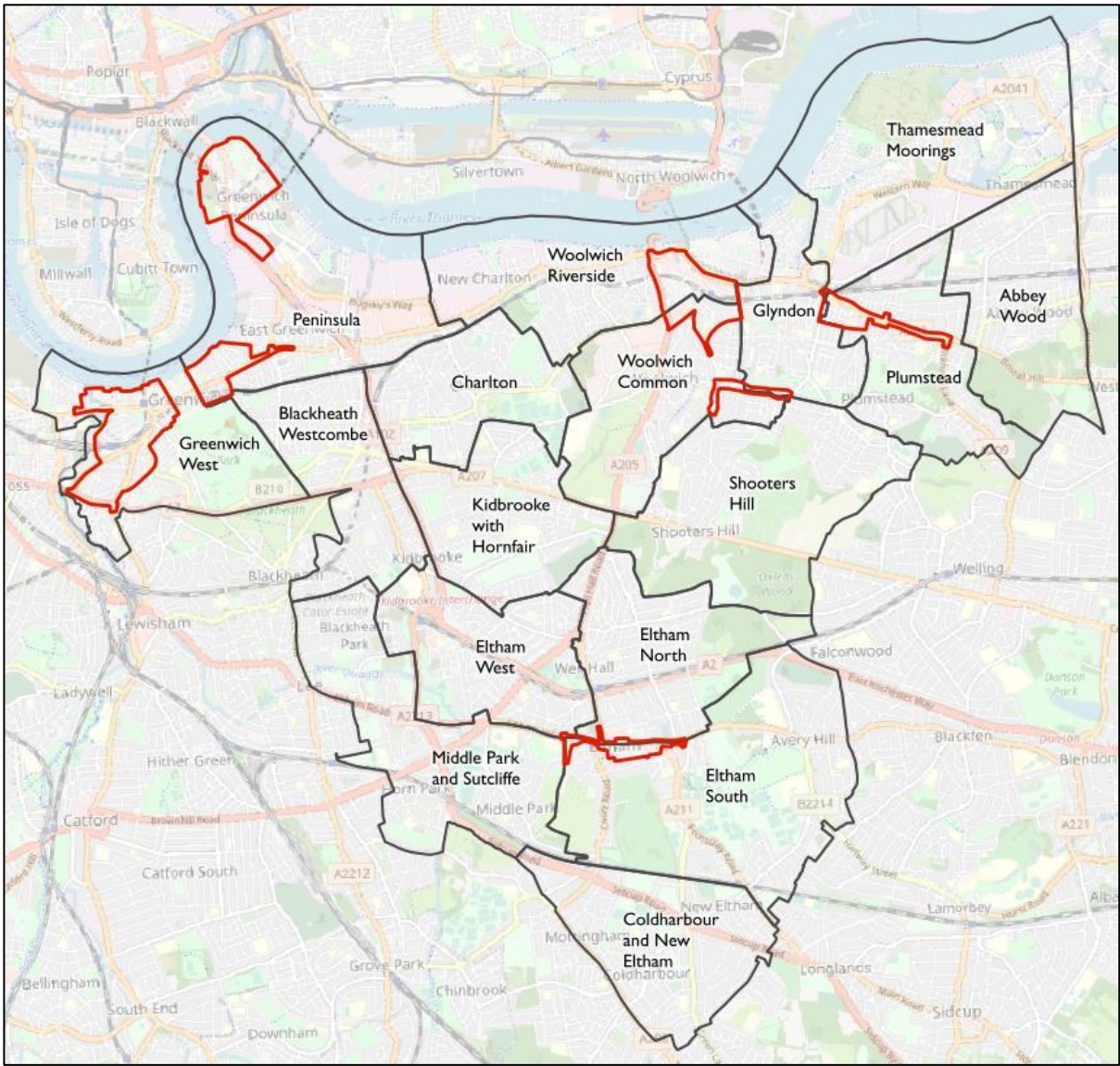
Produced By:	
Name:	David Hodges
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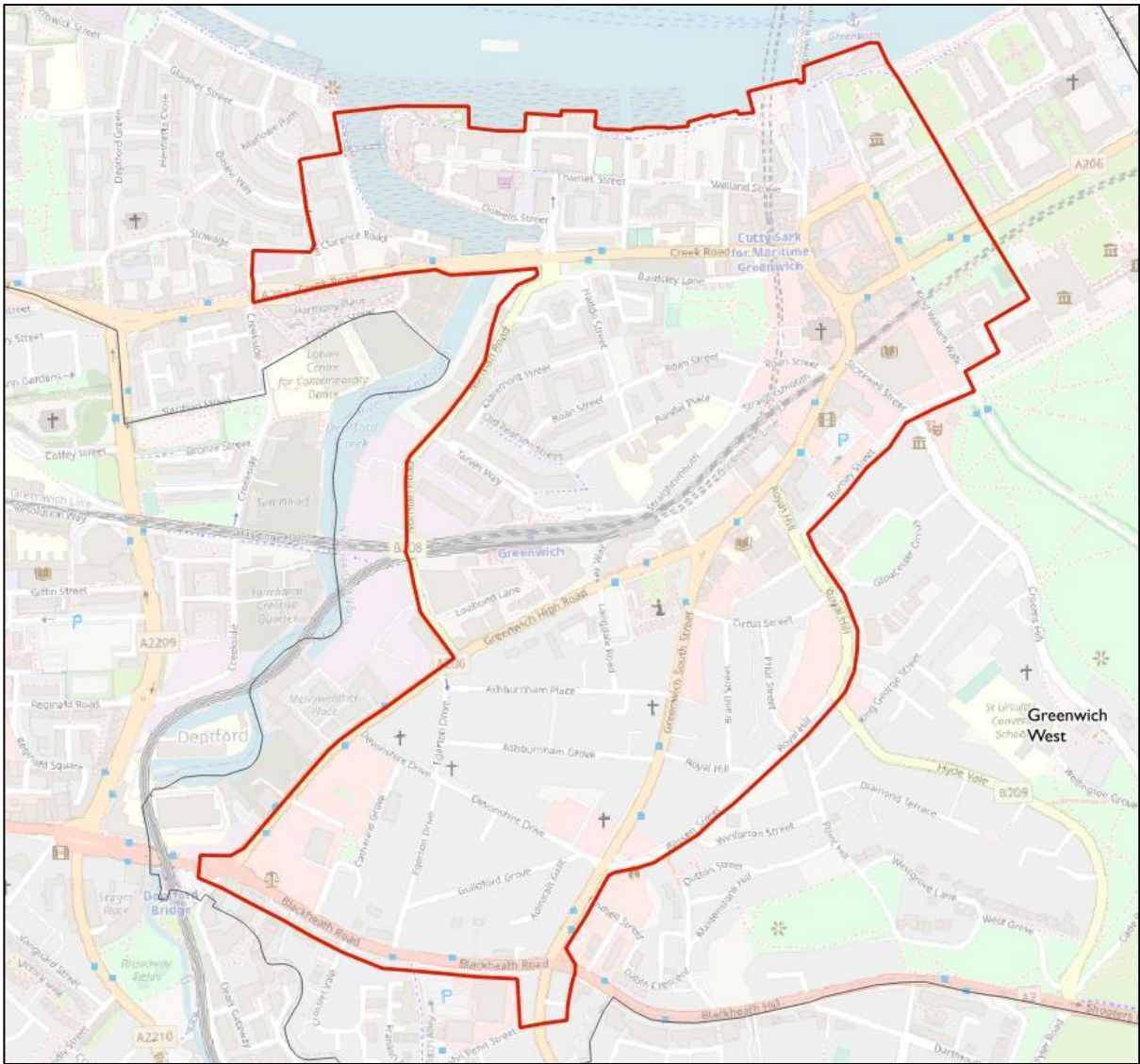
## Cumulative Impact Zones

The maps below indicate the locations of the Cumulative Impact Zones within Royal Greenwich.

Overall Royal Borough of Greenwich:



Greenwich Town Centre:

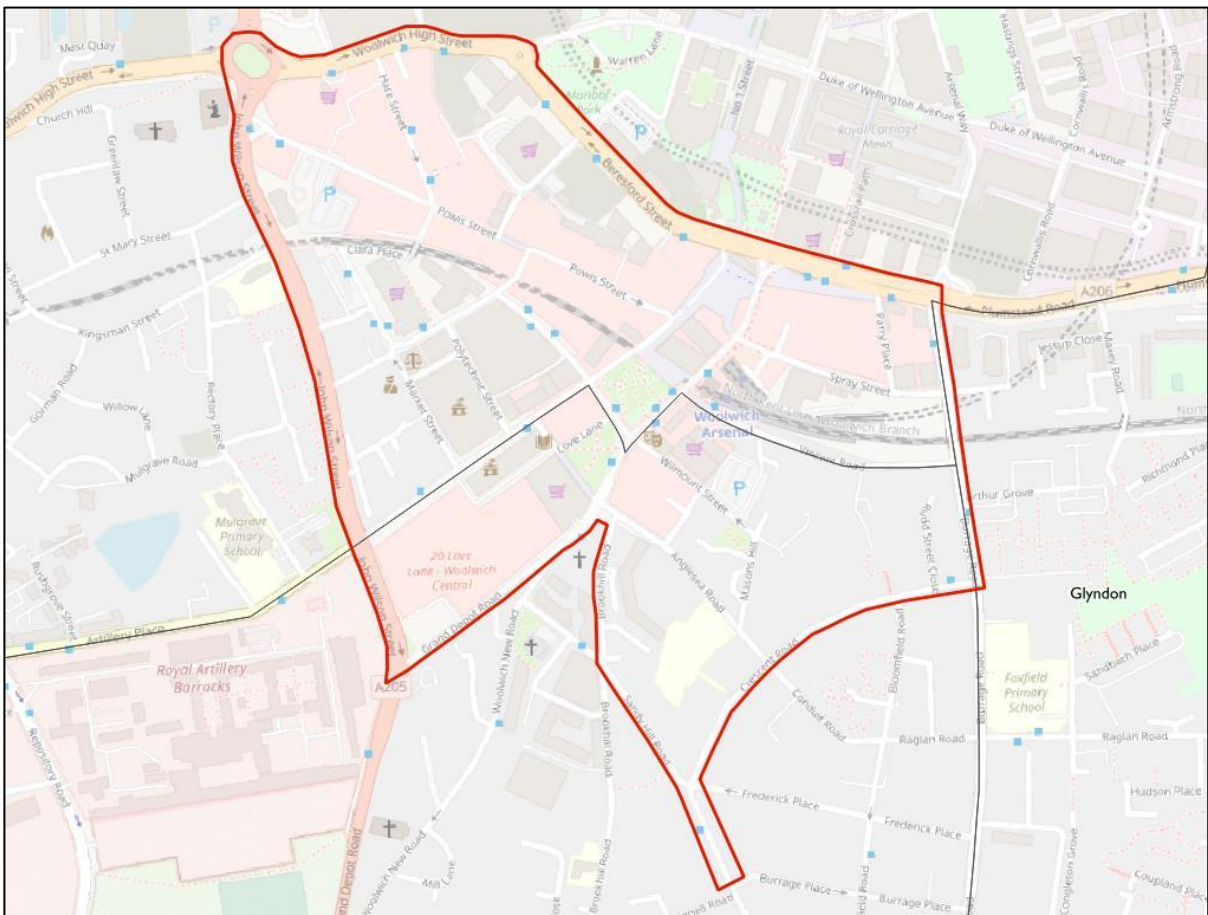




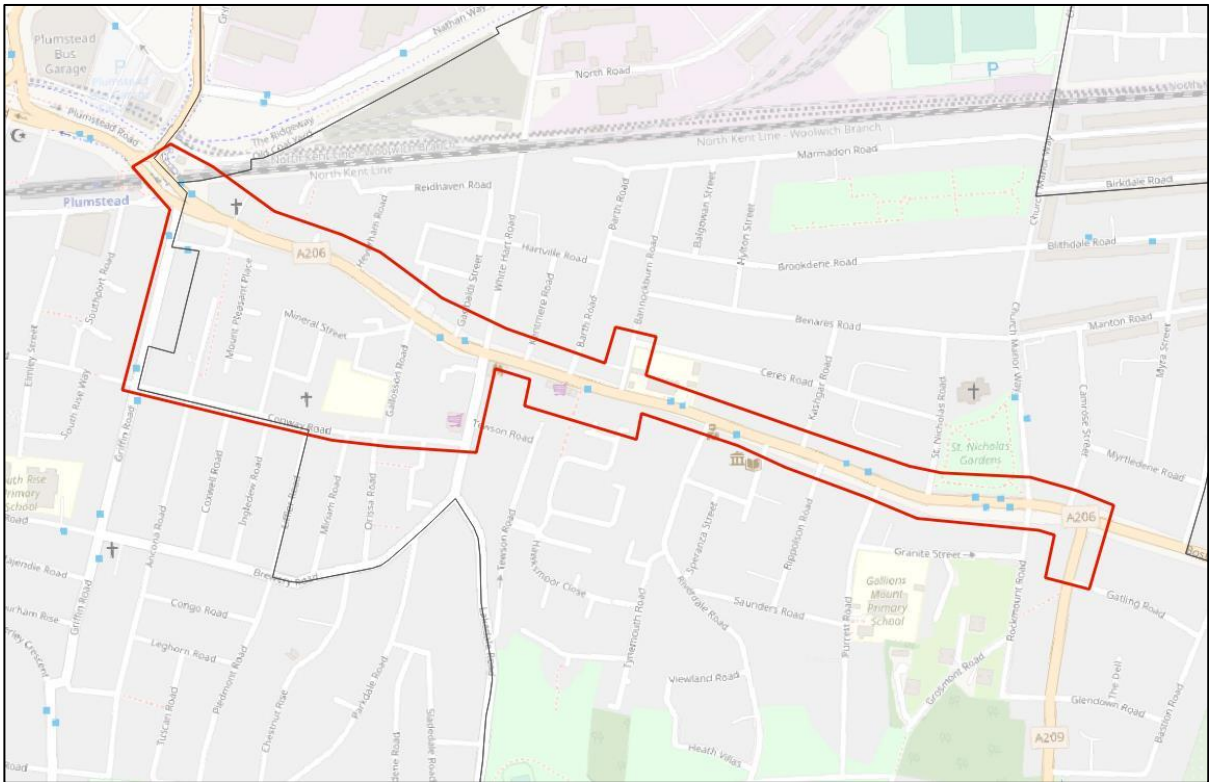
Trafalgar Road:



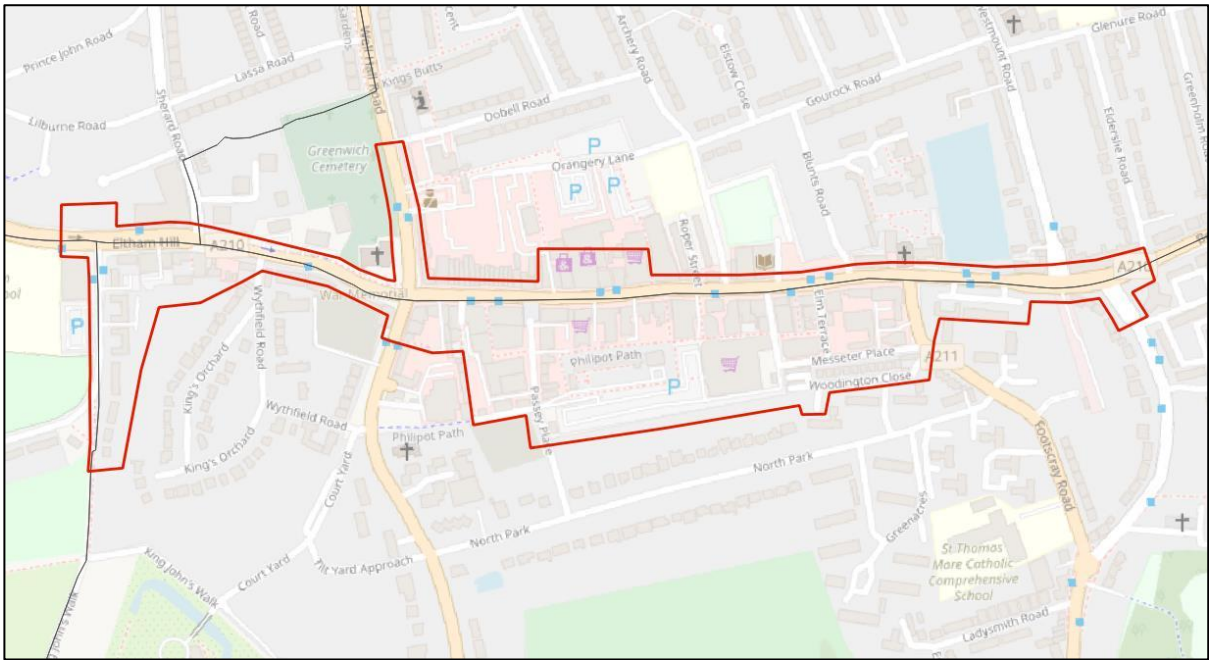
Woolwich Town Centre:



Plumstead High Street:

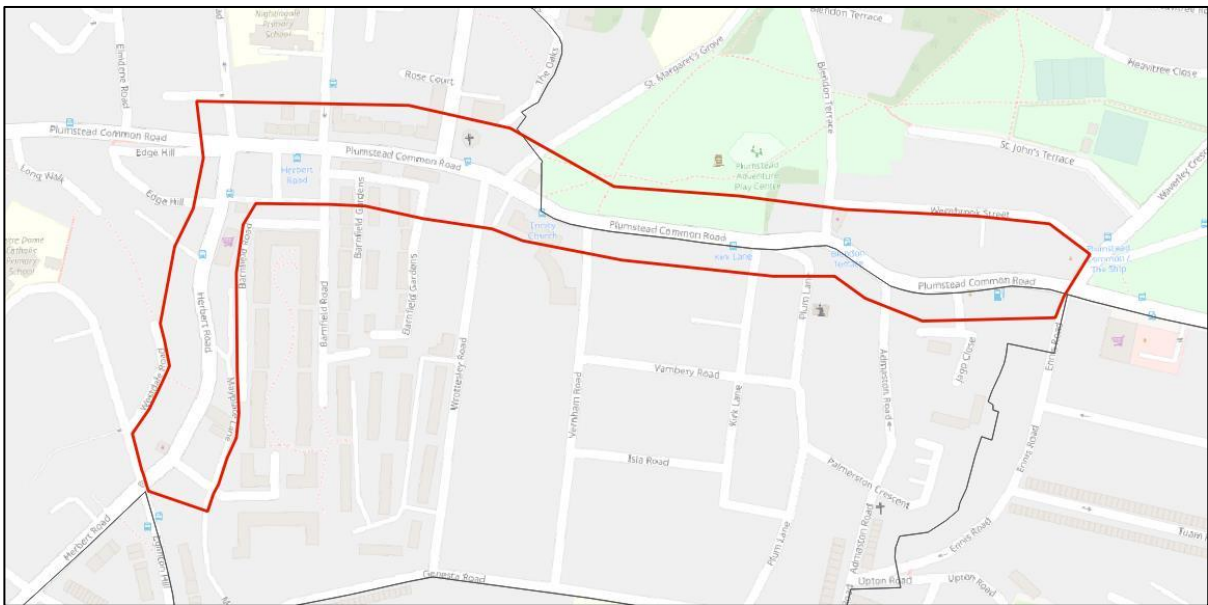


Eltham High Street:

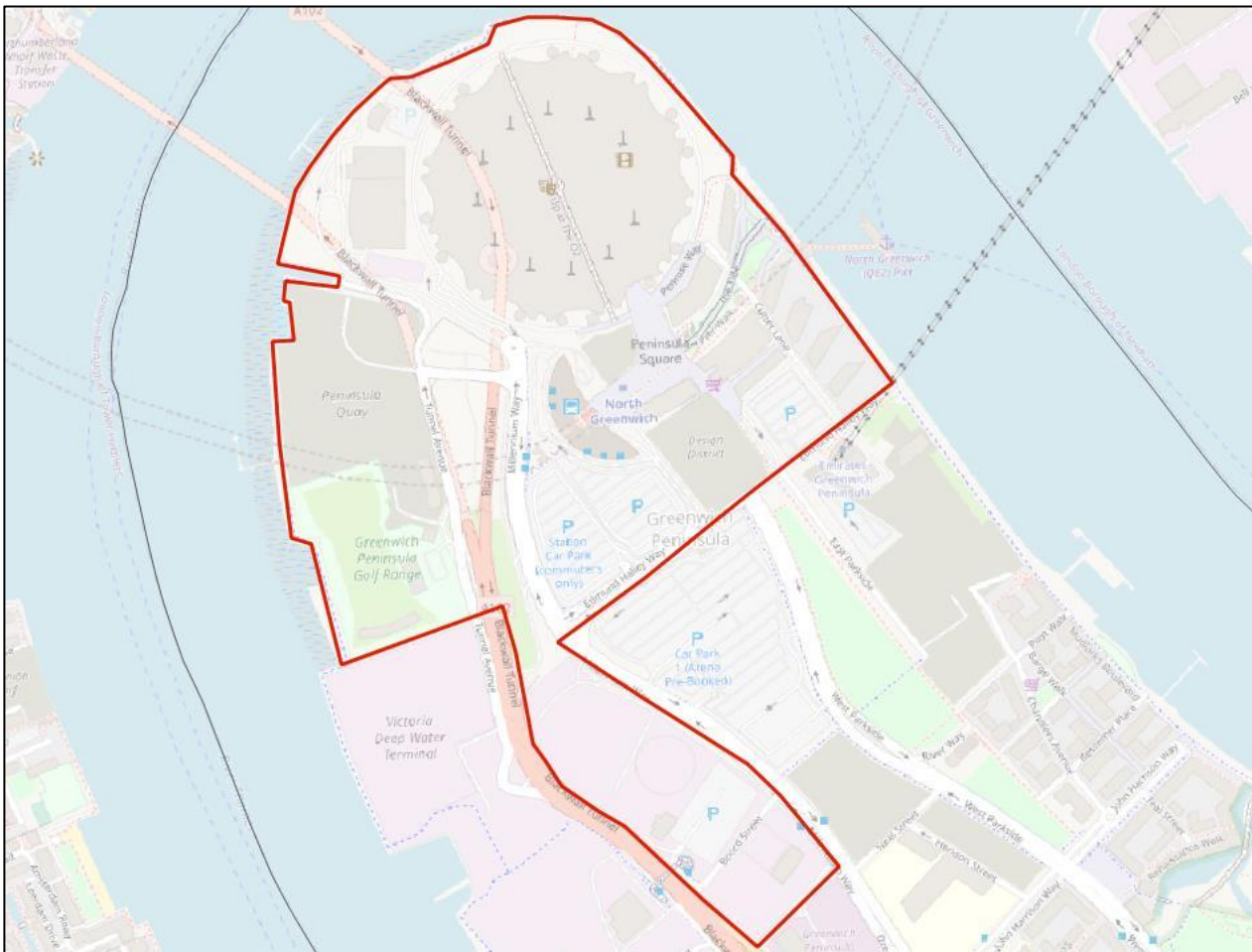




Herbert Road/Plumstead Common Road:



Peninsula:



## Methodology

The Cumulative Impact Zones (CIZs) were drawn tightly to the area that contained the licenced premises with the intent of limiting coverage of residential areas and to make the data analysed most relevant to the public area of the zone.

To establish a spatial element to the analysis of the data, the zones were measured using km<sup>2</sup> to allow a direct comparison between areas of different sizes and compare proportionally to the Royal Borough of Greenwich.

Crime Data were extracted from the Police crime recording system (CRIS) and are based on Home Office classifications. From this data, a subset of data where alcohol was involved were created to identify offences where the victim, suspect or both had been drinking and where key words relating to alcohol are identified. The data with an alcohol indicator has then been further analysed over the crime groups. This dataset has been described in the document as “alcohol-related crime”. The offence data cover April 1<sup>st</sup> 2012 to March 31<sup>st</sup> 2013 and April 1<sup>st</sup> 2018 to March 31<sup>st</sup> 2019.

Alcohol-related incidents were also analysed using CAD data for April 1<sup>st</sup> 2018 to March 31<sup>st</sup> 2019; CAD is the system used to record telephone calls to the Police.

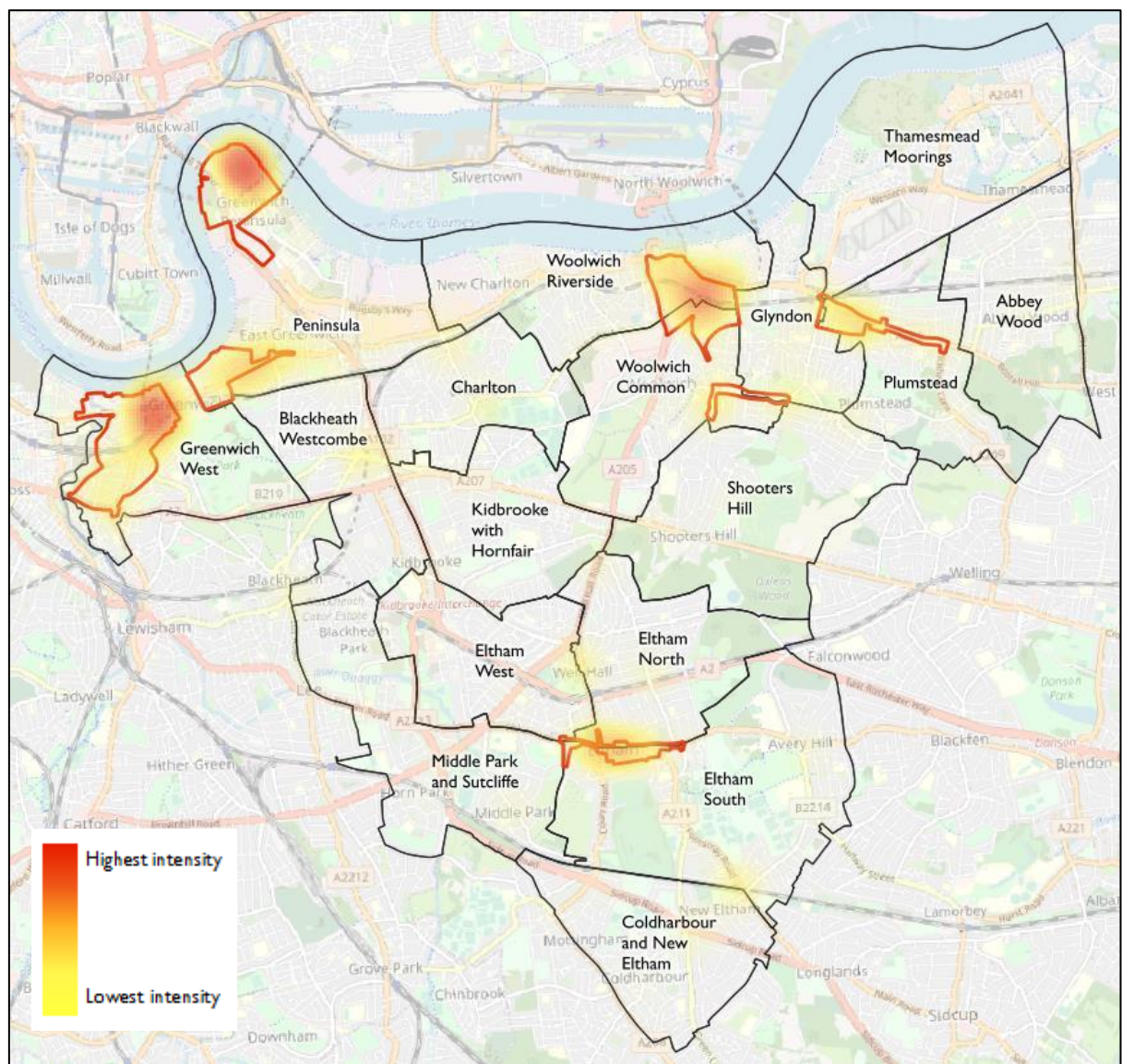
Ambulance service data were also analysed where incidents were flagged as being ‘alcohol-related’. This information was available through the LASS system and is refined to Output Area level. Although less geographically precise than the CRIS / CAD records, the LASS data was used to corroborate the most significant locations for alcohol incidents. This data is from 1<sup>st</sup> April 2018 to 31<sup>st</sup> March 2019.

Noise data covering the period 1<sup>st</sup> January 2019 to 31<sup>st</sup> December 2019 were provided by the Royal Borough of Greenwich Council’s Noise Team. This dataset contains complaints made by the public to the council about noise created by on licenced premises.



Background Information

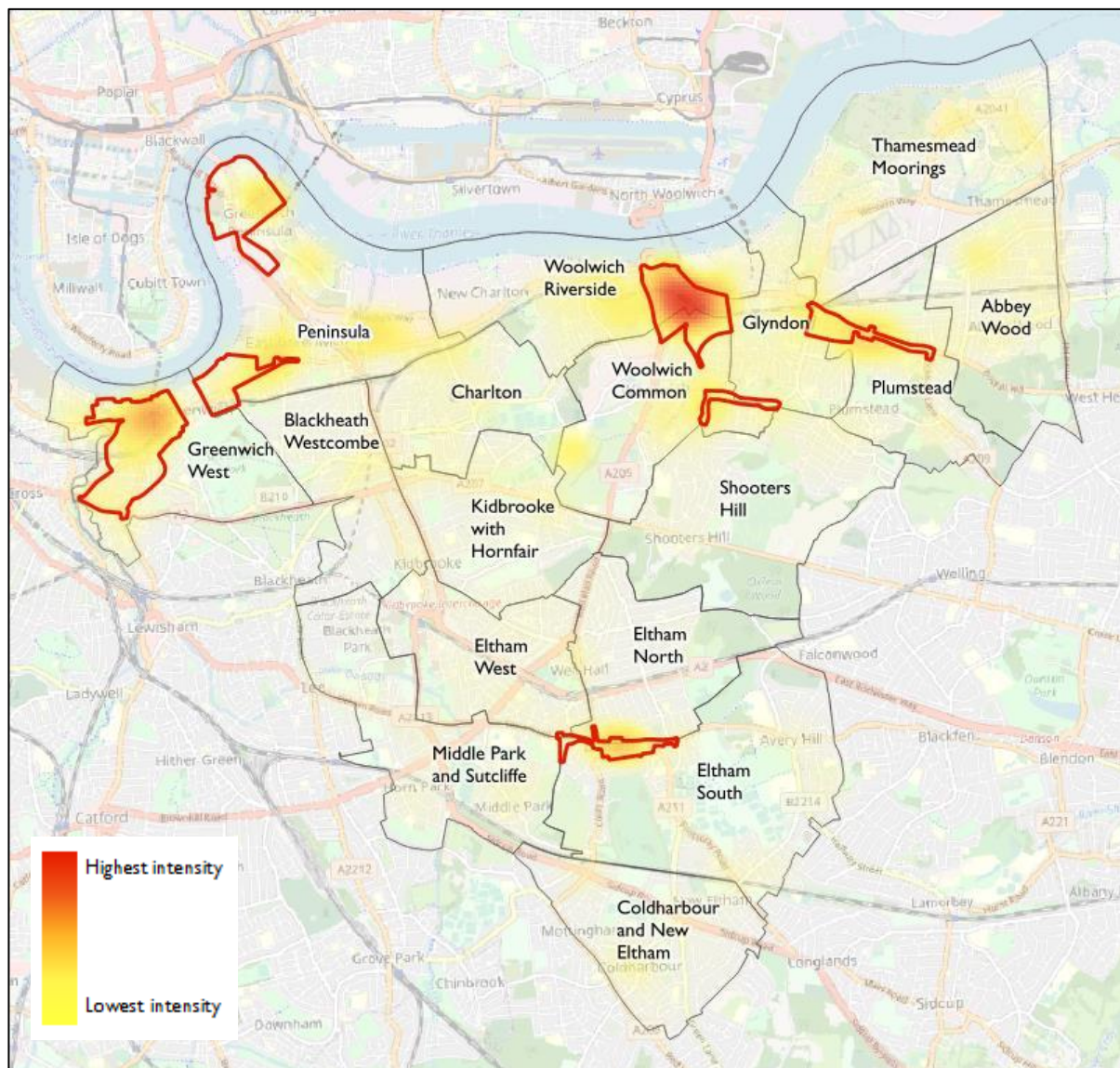
Distribution of licenced premises in the Royal Borough of Greenwich



The

proposed CIZs clearly capture the areas within Royal Greenwich that have a high concentration of licenced premises.

## Hotspots of all recorded crime in the Royal Borough of Greenwich



The areas with the highest concentrations of recorded crime fall within the proposed CIZs. Areas with high concentrations of recorded crime that do not have large numbers of licenced premises, such as Charlton or Abbey Wood, would not be considered for a CIZ.



### Data summary including breakdown by percentage and per km<sup>2</sup>

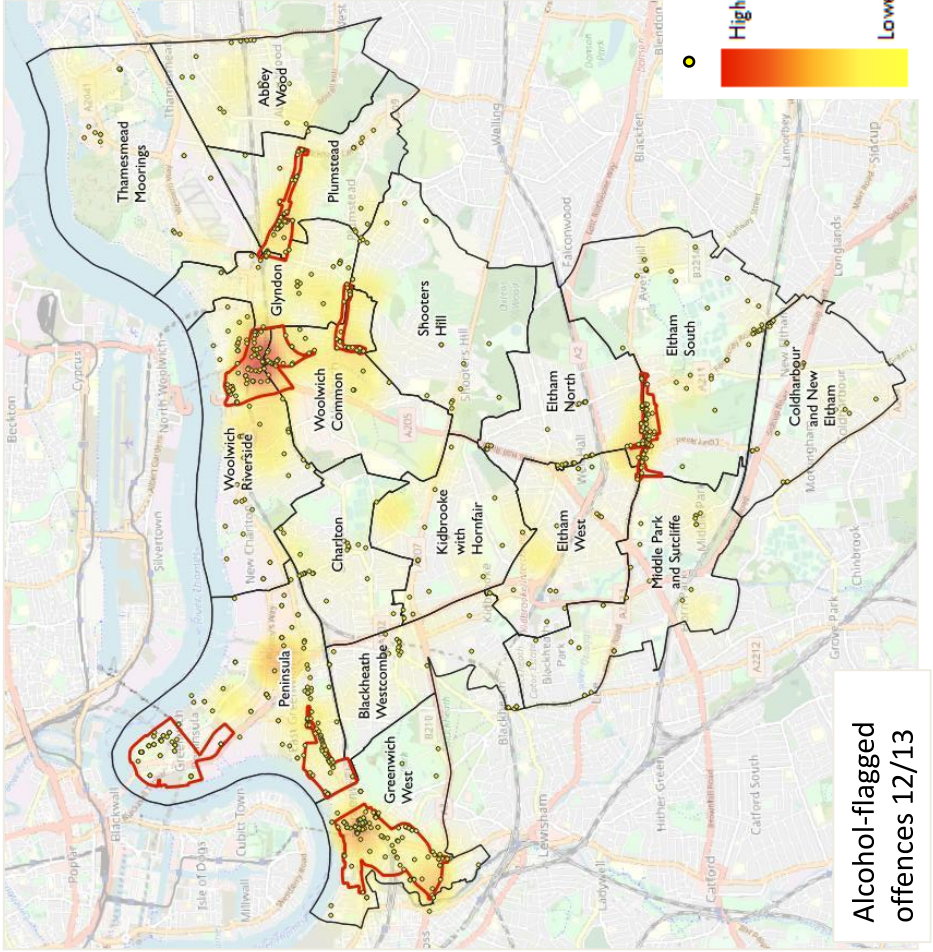
Name	Area (km2)	Premises		Offences 18/19		Offences 12/13	
		Number	%	Offences	Per km2	Offences	Per km2
CIZ GTC	0.73	106	12.1%	41	56.33	62	85.19
ElthamHS	0.15	44	5.0%	12	81.33	21	142.32
Peninsula CIZ	0.51	87	9.9%	26	51.20	6	11.81
HerbertCIZ	0.08	26	3.0%	15	198.66	14	185.42
PlumsteadCIZ	0.18	41	4.7%	12	66.64	25	138.84
TrafalgarRoad	0.25	35	4.0%	7	28.28	15	60.60
WTC CIZ	0.48	82	9.4%	41	84.94	80	165.73
None	44.98	456	52.0%	338	7.51	527	11.72

Name	Area (km2)	Noise 2019		CAD 18/19	
		Complaints	Per km2	Calls	Per km2
CIZ GTC	0.73	18	23.7%	16.00	21.98
ElthamHS	0.15	2	2.6%	4.00	27.11
Peninsula CIZ	0.51	12	15.8%	1.00	1.97
HerbertCIZ	0.08	1	1.3%	1.00	13.24
PlumsteadCIZ	0.18	5	6.6%	2.00	11.11
TrafalgarRoad	0.25	5	6.6%	2.00	8.08
WTC CIZ	0.48	9	11.8%	14.00	29.00
None	44.98	24	31.6%	35.00	0.78

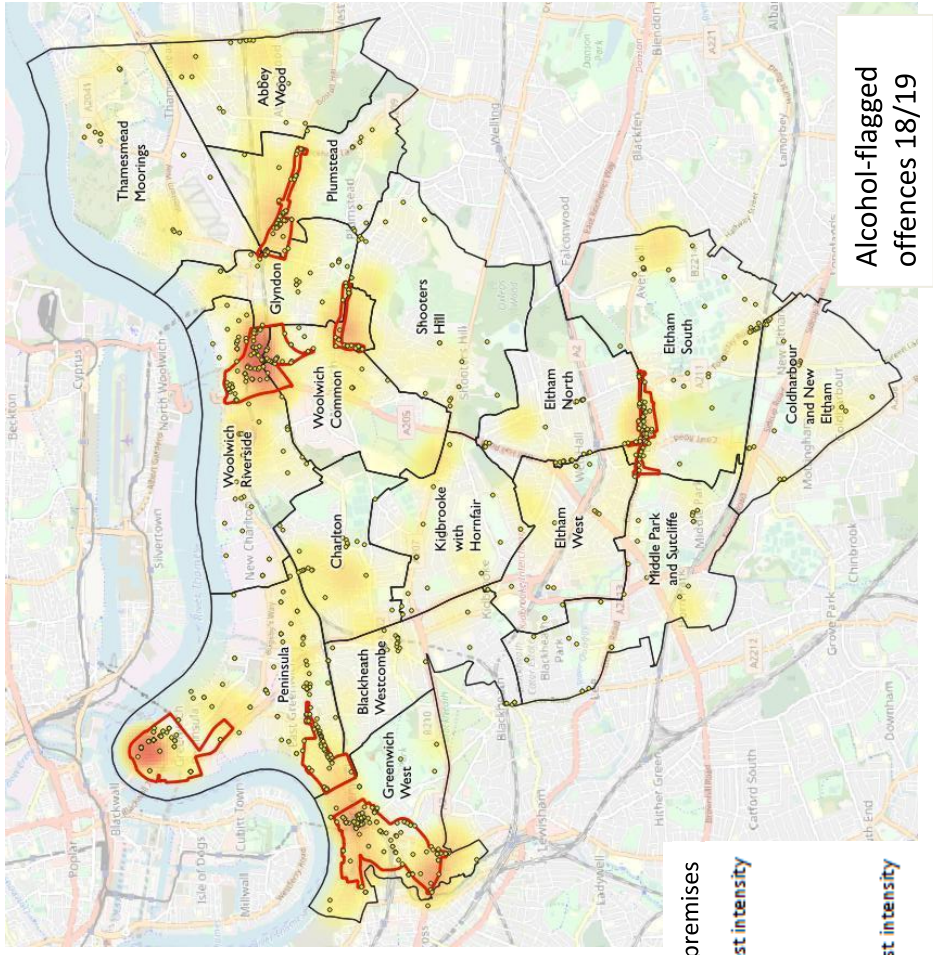
The licenced premises within the CIZs account for 48% of all licenced premises within the Royal Borough, despite the CIZs accounting for just 5.0% of the total area. Similarly, they contain 31.3% of alcohol-related offences (increased from 29.7% in 2012/13). Despite the smallest area covered, the new Herbert Road/Plumstead Common Road CIZ has the highest number of premises and offences per square kilometre. The new Peninsula CIZ has seen a rise in offences from a concentration just above the rest of Royal Greenwich in 2012/13 to over 7 times the area outside of a CIZ in 2018/19.

# Alcohol-Related Crime

Hotspots of all recorded alcohol-related crime in the Royal Borough of Greenwich April 2018 to March 2019



Alcohol-flagged offences 12/13



Alcohol-flagged offences 18/19

Offences around existing CIZs have remained steady, however an increase in offences is noted in the area around the O2 and Plumstead Common Road.

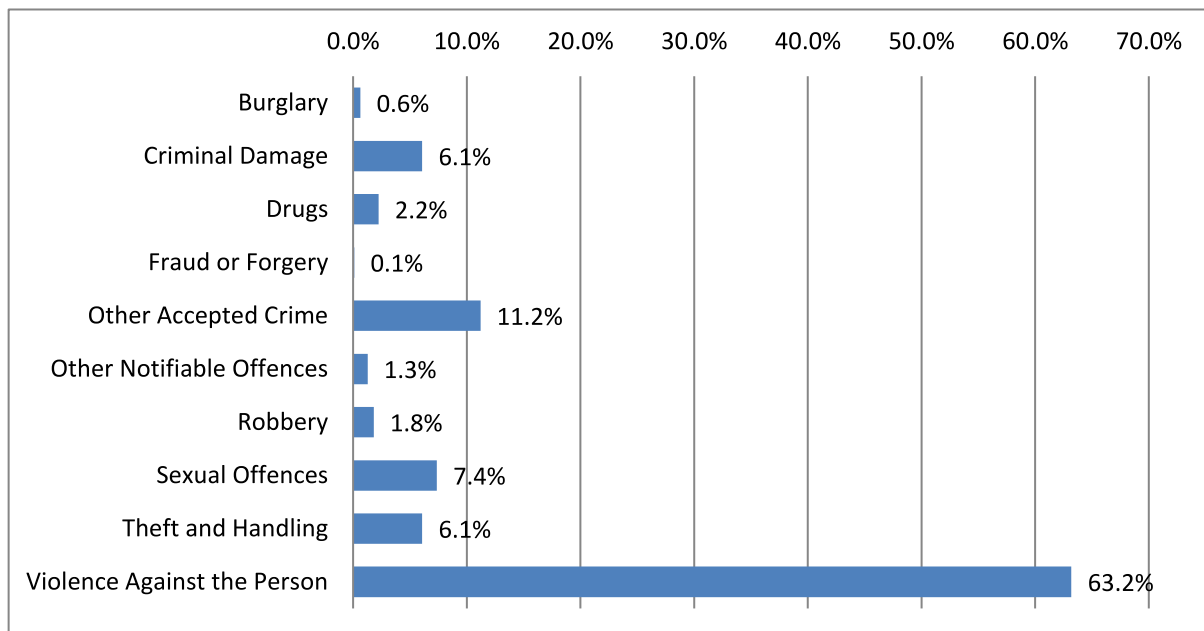
## Temporal Analysis of alcohol-related offences

Time	Mon	Tue	Wed	Thu	Fri	Sat	Sun	Total	%
00:00-00:59	11	5	10	19	7	24	24	100	10.7%
01:00-01:59	7	10	9	8	9	22	25	90	9.6%
02:00-02:59	1	2	6	5	7	15	15	51	5.4%
03:00-03:59	0	2	7	2	4	19	12	46	4.9%
04:00-04:59	4	0	1	3	4	7	12	31	3.3%
05:00-05:59	0	2	2	3	3	9	4	23	2.5%
06:00-06:59	0	1	0	0	1	3	4	9	1.0%
07:00-07:59	2	1	0	2	1	3	5	14	1.5%
08:00-08:59	0	0	2	1	1	3	3	10	1.1%
09:00-09:59	3	2	2	2	0	4	2	15	1.6%
10:00-10:59	3	0	1	0	1	1	3	9	1.0%
11:00-11:59	0	1	1	1	0	0	3	6	0.6%
12:00-12:59	3	1	1	5	1	3	5	19	2.0%
13:00-13:59	1	1	4	0	4	3	0	13	1.4%
14:00-14:59	0	4	1	1	1	1	2	10	1.1%
15:00-15:59	5	3	4	3	4	7	3	29	3.1%
16:00-16:59	7	4	5	6	5	5	6	38	4.1%
17:00-17:59	6	8	2	4	4	7	4	35	3.7%
18:00-18:59	3	2	3	3	5	7	5	28	3.0%
19:00-19:59	6	7	6	7	8	14	6	54	5.8%
20:00-20:59	5	9	9	11	12	16	11	73	7.8%
21:00-21:59	3	13	8	8	9	11	13	65	6.9%
22:00-22:59	9	6	9	7	23	18	7	79	8.4%
23:00-23:59	7	13	13	7	15	23	12	90	9.6%
Total	86	97	106	108	129	225	186		
%	9.2%	10.4%	11.3%	11.5%	13.8%	24.0%	19.9%		

The peak days and times for offences in the CIZs are on Friday, Saturday and Sunday evenings between 20:00 and 02:00. This mirrors the national picture for alcohol-related offences.



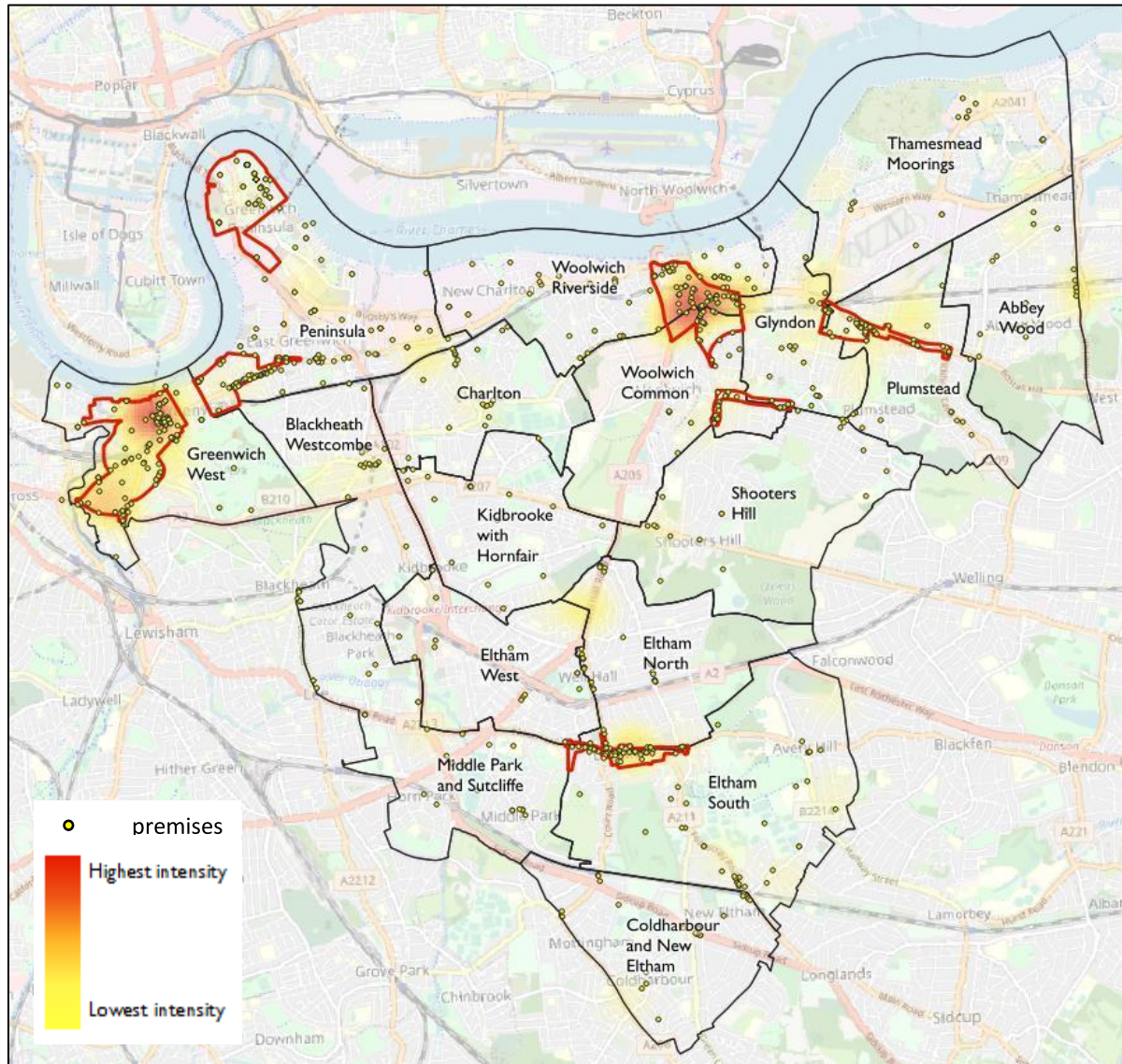
## Alcohol related crime in the Royal Borough of Greenwich by type



Violence against the person offences make up almost two-thirds of all alcohol-related offences within Royal Greenwich. The prevalence of high-harm offences associated with alcohol necessitates the CIZ policy to ensure that these risks are mitigated.

## CAD Calls

### Hotspots of alcohol-related CAD calls April 2018 to March 2019



There are few CAD calls in Plumstead Town Centre and around the O2, although this is attributed to a lack of residents and the addition of the in-house Police may affect the latter.

## Temporal Analysis of alcohol-related CAD calls

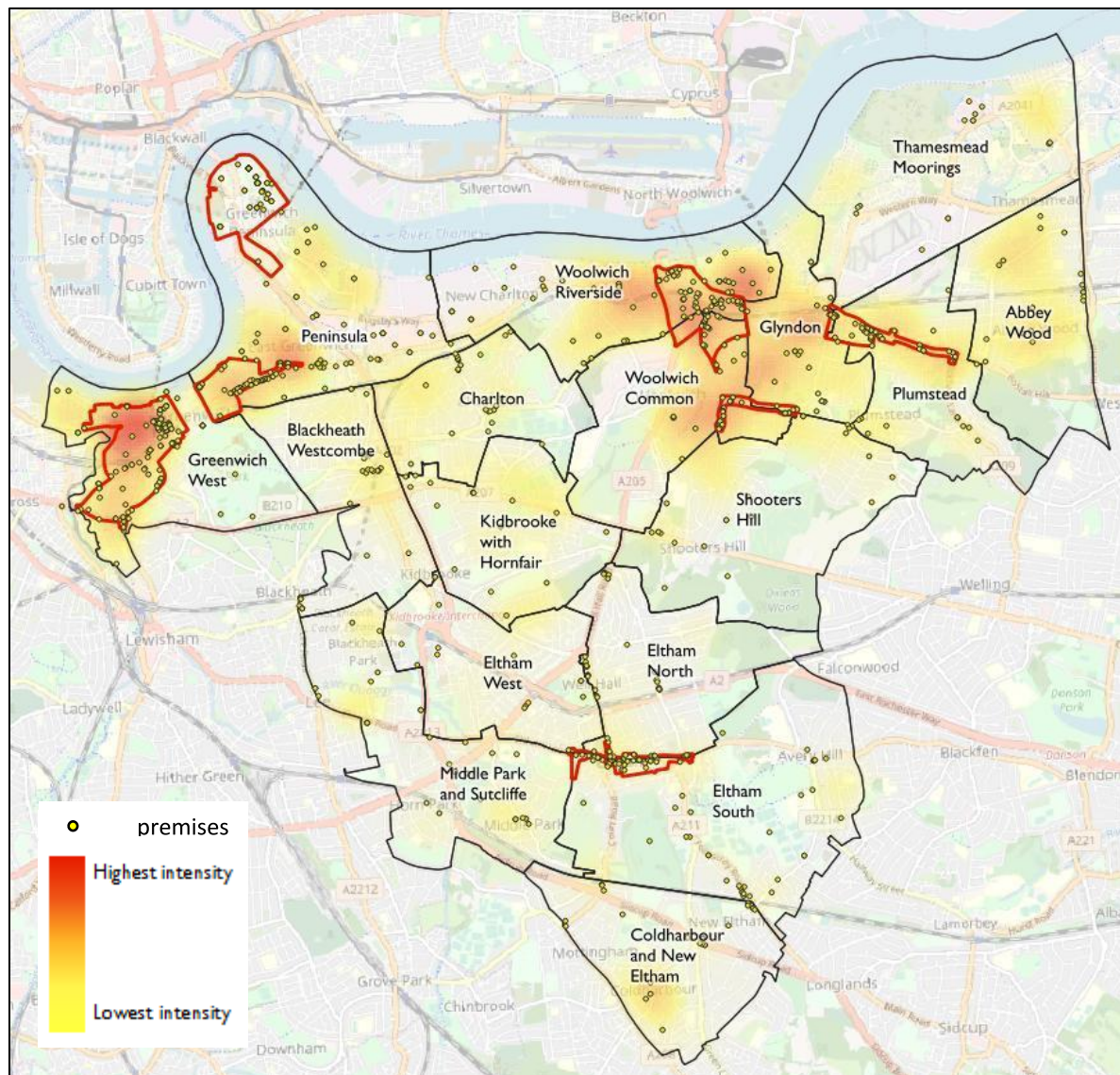
Time	Mon	Tue	Wed	Thu	Fri	Sat	Sun	Total	%
00:00-00:59	1	0	1	1	1	1	0	5	6.7%
01:00-01:59	0	0	0	0	1	0	2	3	4.0%
02:00-02:59	0	0	0	0	0	1	1	2	2.7%
03:00-03:59	0	1	0	0	0	0	1	2	2.7%
05:00-05:59	1	0	0	0	0	3	0	4	5.3%
06:00-06:59	1	0	0	0	0	1	0	2	2.7%
07:00-07:59	0	0	0	0	0	1	1	2	2.7%
08:00-08:59	0	0	0	0	0	0	1	1	1.3%
09:00-09:59	0	0	0	0	0	0	1	1	1.3%
10:00-10:59	0	0	0	0	0	0	1	1	1.3%
11:00-11:59	0	0	0	1	0	0	0	1	1.3%
12:00-12:59	0	0	1	1	0	1	0	3	4.0%
13:00-13:59	1	0	0	1	0	0	0	2	2.7%
14:00-14:59	1	0	0	0	1	0	0	2	2.7%
15:00-15:59	1	0	0	0	0	0	1	2	2.7%
17:00-17:59	2	1	0	0	0	2	1	6	8.0%
18:00-18:59	1	1	0	2	0	0	2	6	8.0%
19:00-19:59	1	0	1	2	1	1	0	6	8.0%
20:00-20:59	0	1	0	0	0	2	1	4	5.3%
21:00-21:59	1	0	0	0	1	1	1	4	5.3%
22:00-22:59	2	0	0	0	0	0	1	3	4.0%
23:00-23:59	2	2	0	1	1	5	2	13	17.3%
Total	15	6	3	9	6	19	17		
%	20.0%	8.0%	4.0%	12.0%	8.0%	25.3%	22.7%		

The peaks for alcohol-related CAD calls are found on late afternoons into the early evenings on Saturday, Sunday and Monday. This is significantly different to the offences analysis where recorded offences have a peak time of between 22:00 and 02:00, and Monday has the lowest number of recorded offences.



## Noise Complaints recorded by the RBG Noise Team

Volume of noise incidents reported to the Royal Borough of Greenwich Noise Team Jan 2019 to Dec 2019.

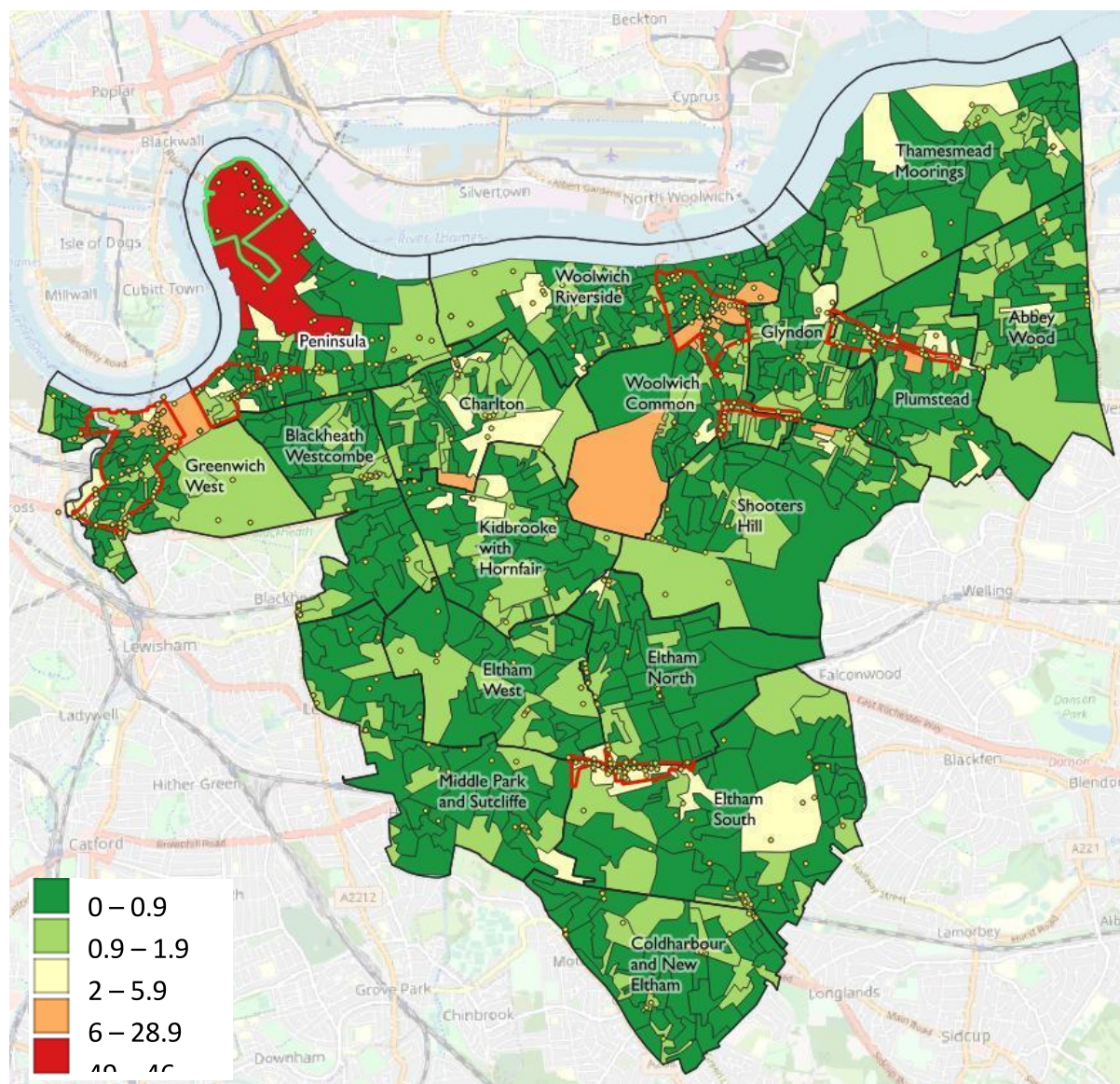


The low levels of noise complaints around the O2 are likely driven by the low resident numbers. As this area continues to grow in terms of residential properties, calls to Royal Greenwich Noise Team are expected to increase.



## London Ambulance Service Alcohol Data

### Number of alcohol related ambulance callouts by Output Area April 2018 to March 2019

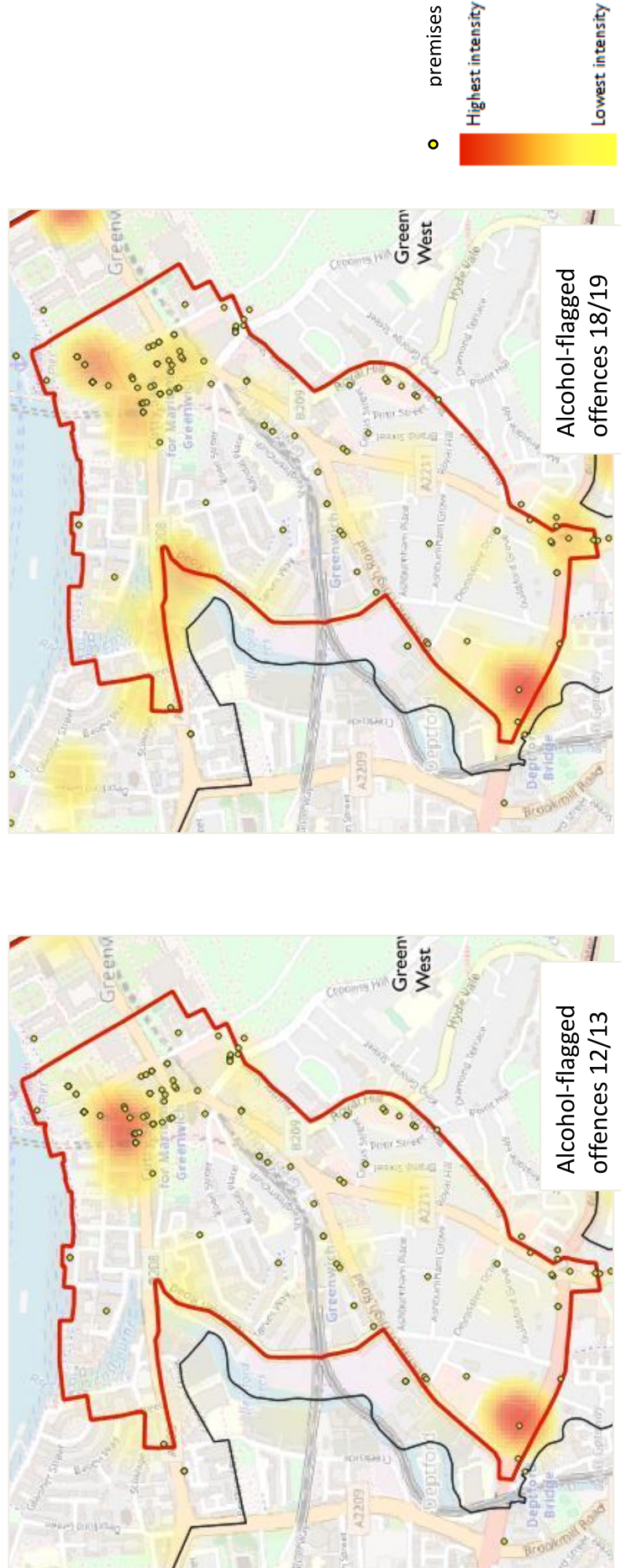


The OAs which have the highest number of alcohol-related incidents generally represent the areas selected for CIZs. The areas of exception such as the south of the Charlton ward, Woolwich Common and north Thamesmead do not have sufficient premises to be considered for either an additional CIZ.

*Note: Whilst more than one ambulance may be called to an incident, only the first call was recorded. The map is produced using Natural Breaks (Jenks) algorithm. This tries to find natural groupings of data to create classes. The resulting classes will be such that there will be maximum variance between individual classes and least variance within each class.*

Detailed Maps of CIZs with Alcohol-Related Crime Hotspots and Premises

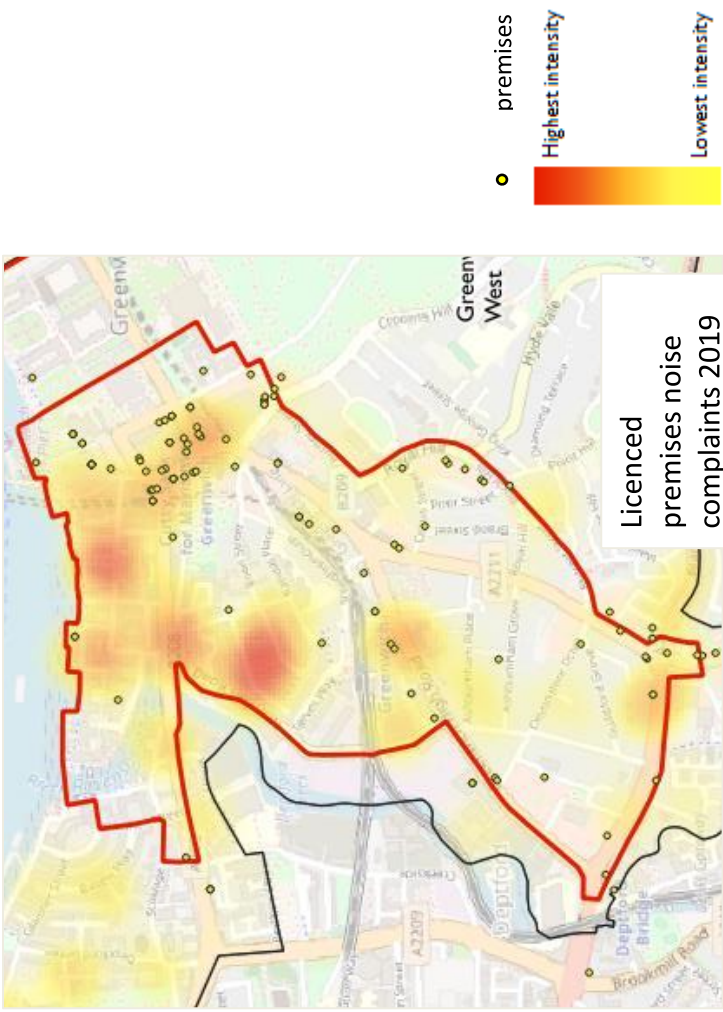
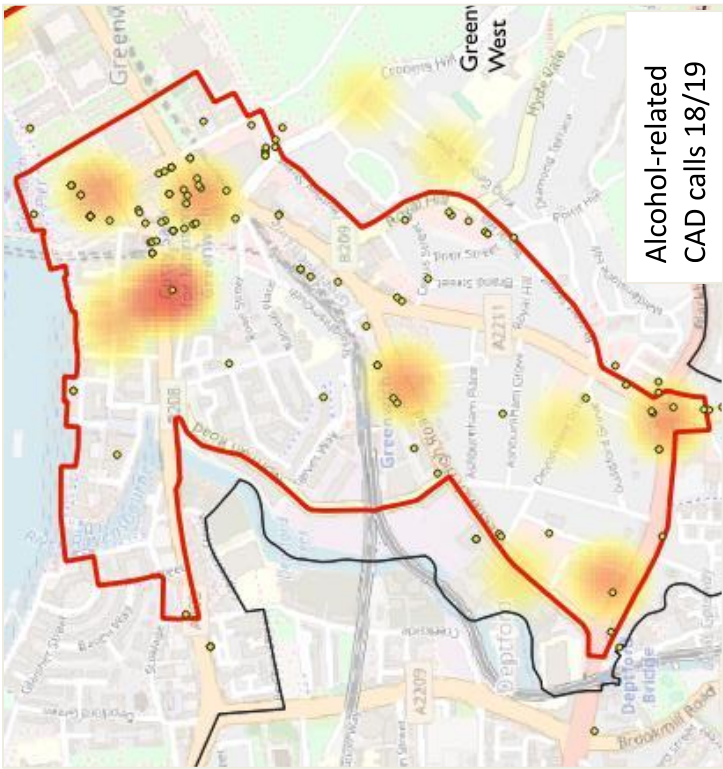
Greenwich Town Centre Cumulative impact zone



Offences are spread within the CIZ more than in 12/13, but the centre is still very low in crime. However, splitting into two separate CIZs for the north and south of West Greenwich were not considered due to the volume of licenced premises-related noise complaints within the centre of the CIZ.

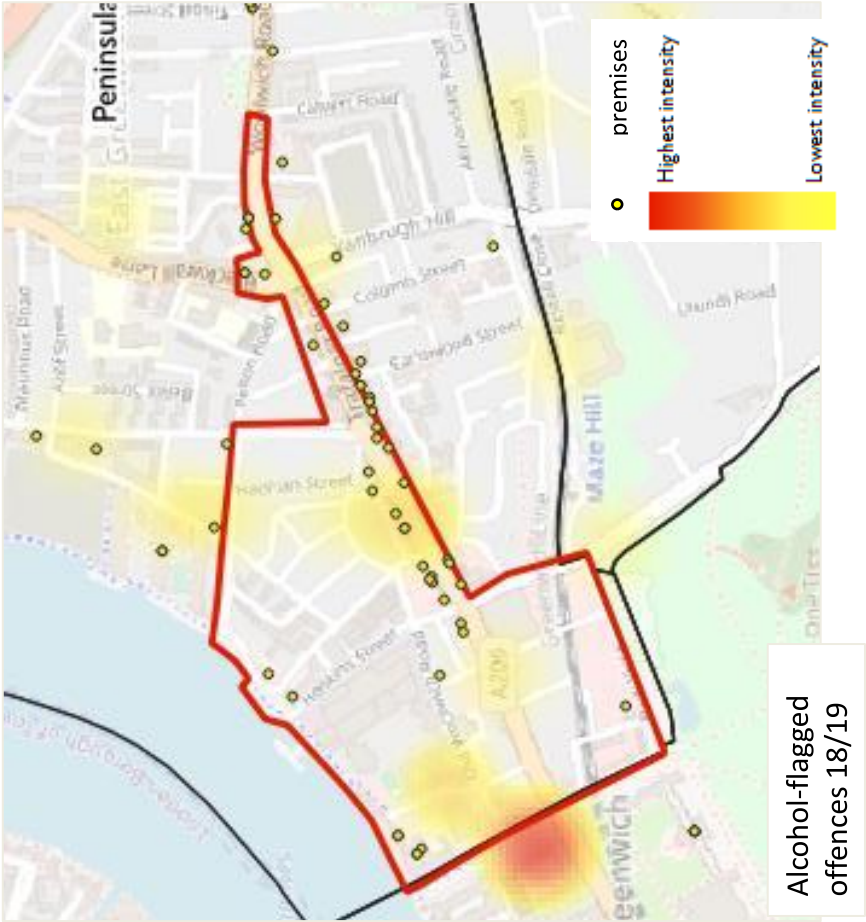
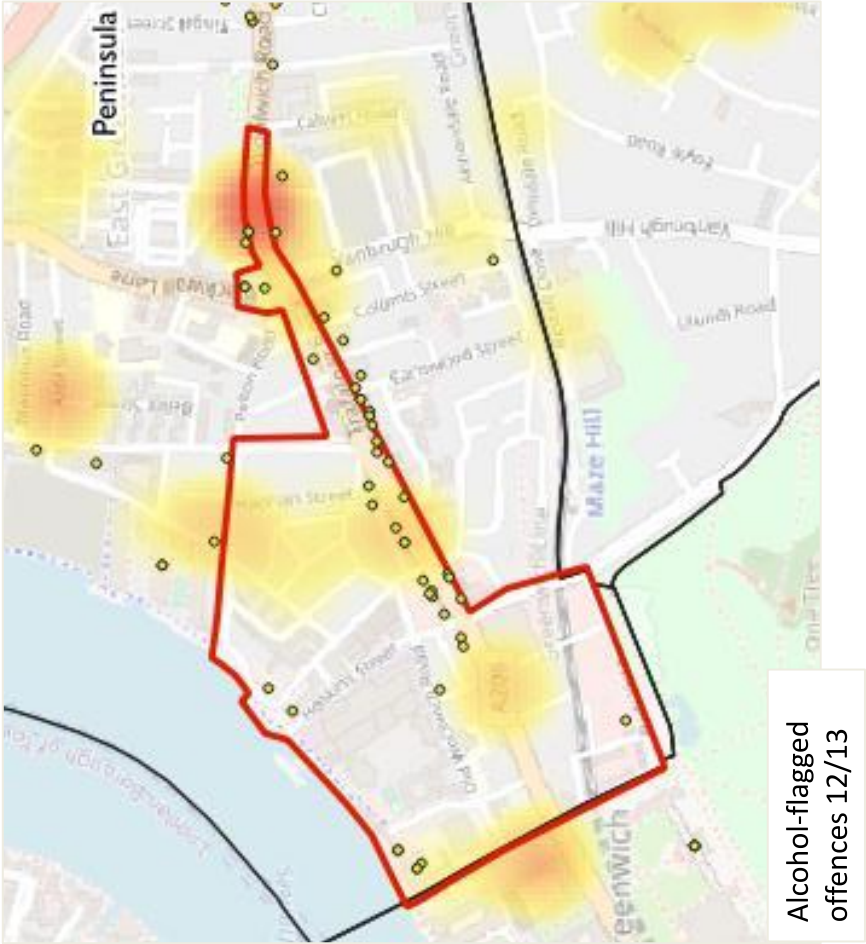


**Greenwich Town Centre Cumulative Impact zone**



The area around Gloucester Circus has been removed due to a reduction in CAD calls and noise complaints. The boundary was adjusted to follow the concentration of premises along Royal Hill.

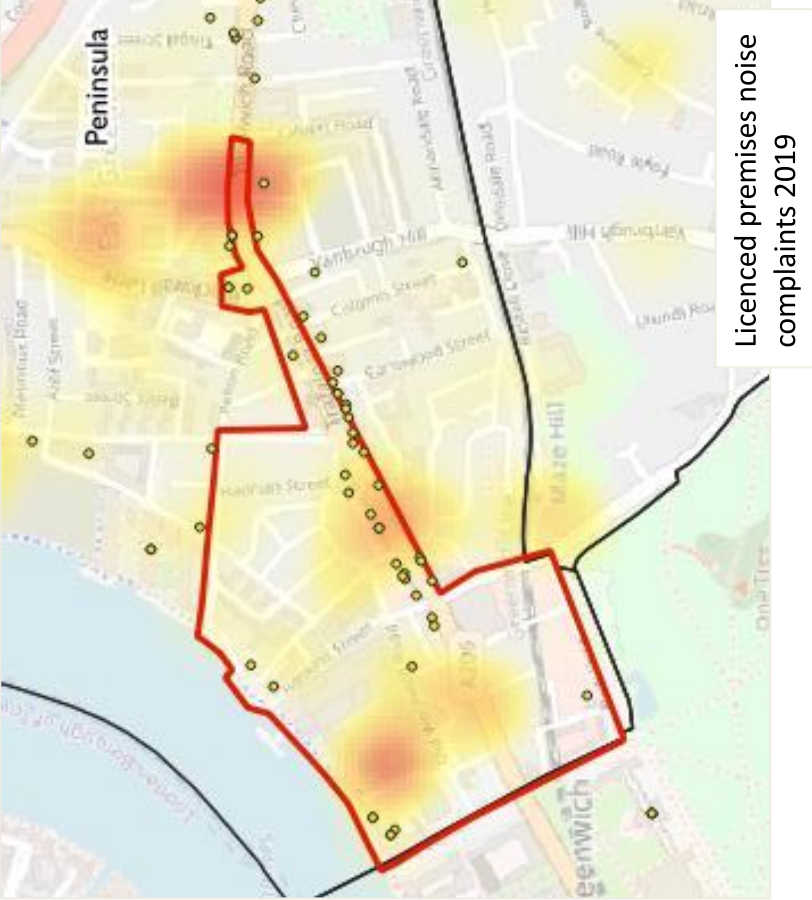
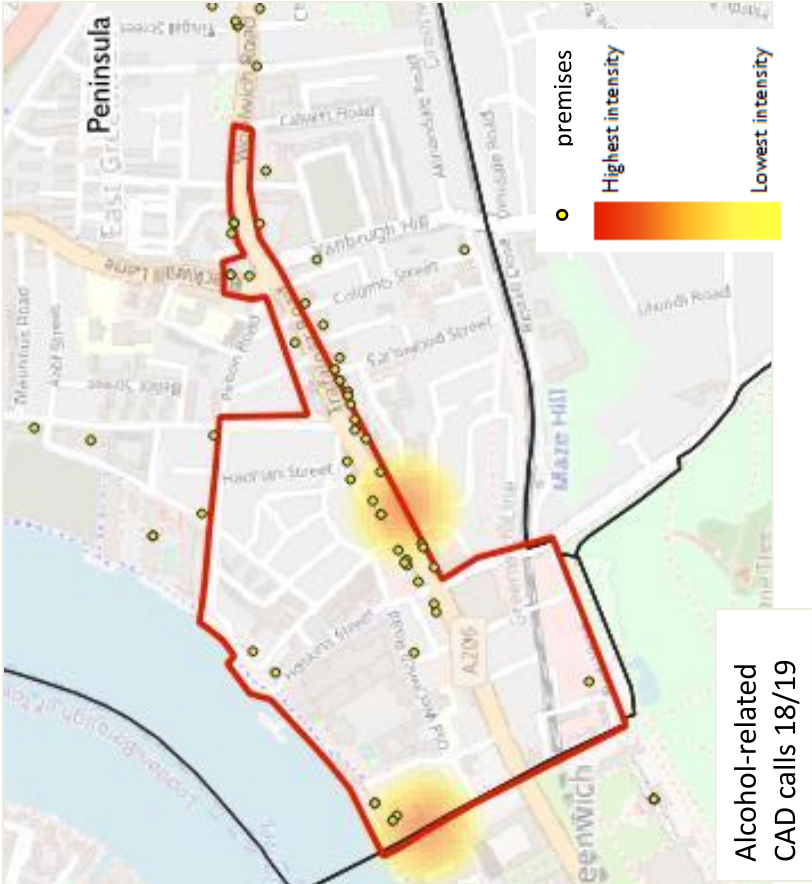
Trafalgar Road Cumulative impact zone



The number of offences within the CIZ have decreased – this is an example of a CIZ being effective and as such should be retained in order to ensure that the benefits are retained.

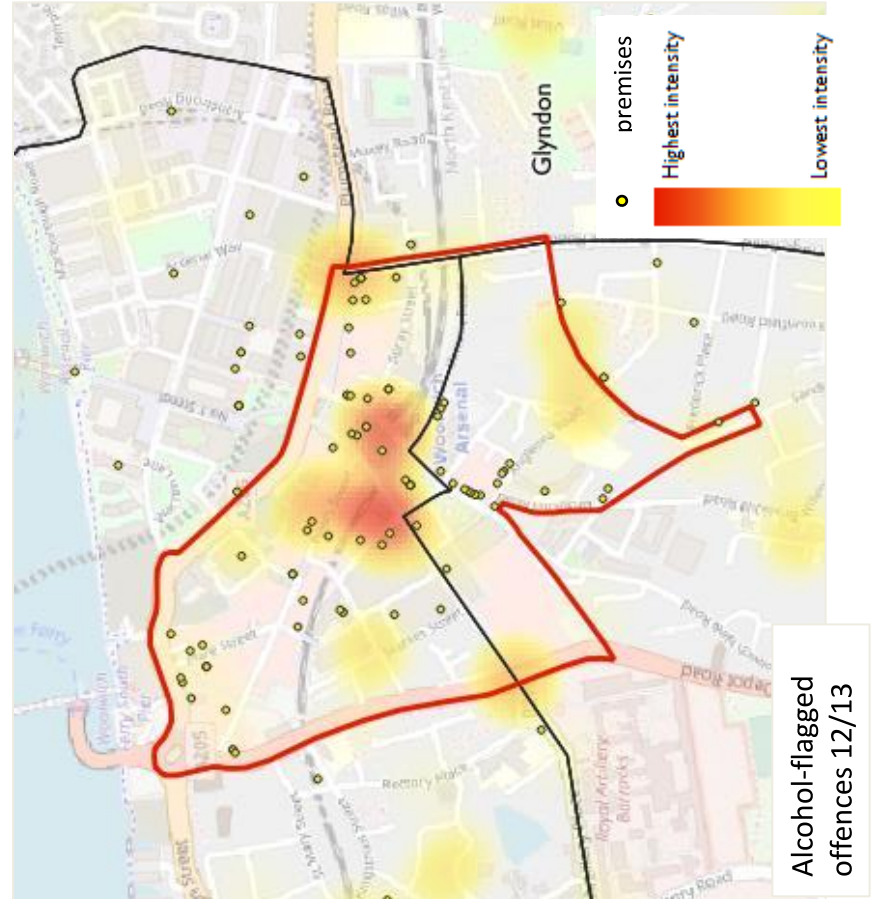


Trafalgar Road Cumulative impact zone



Based on the CAD and noise complaints, and to a lesser degree the offences, the CIZ was expanded to include the area along the riverside. The developments to the north of this area should be considered when re-evaluating this CIZ.

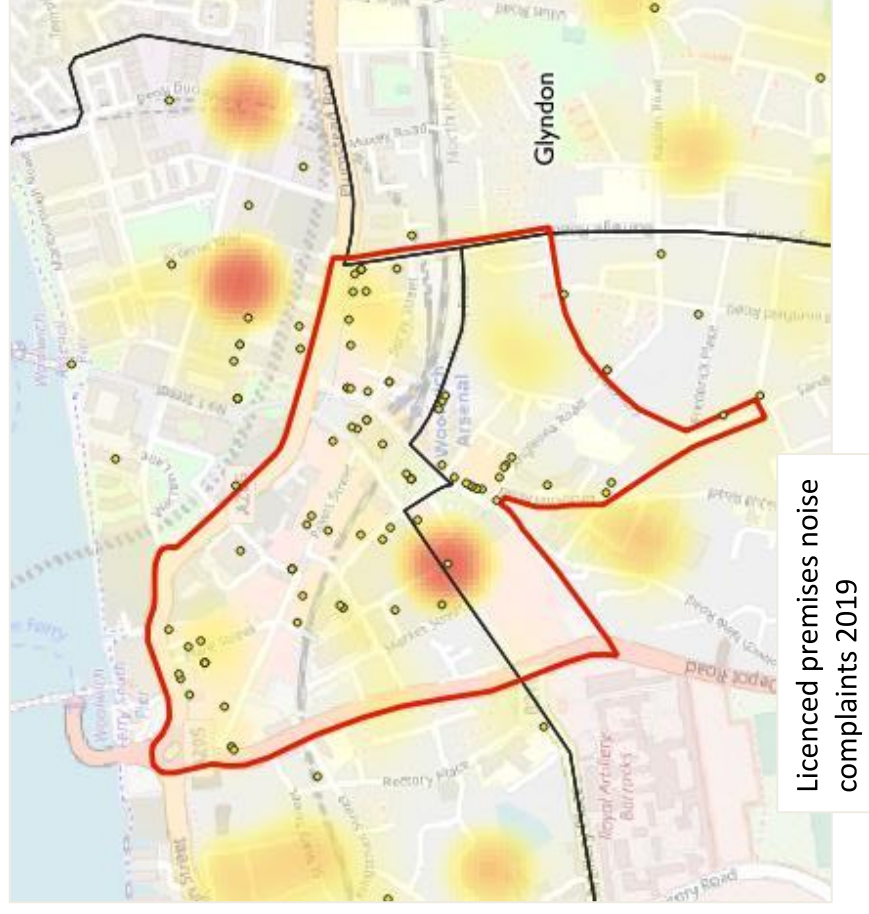
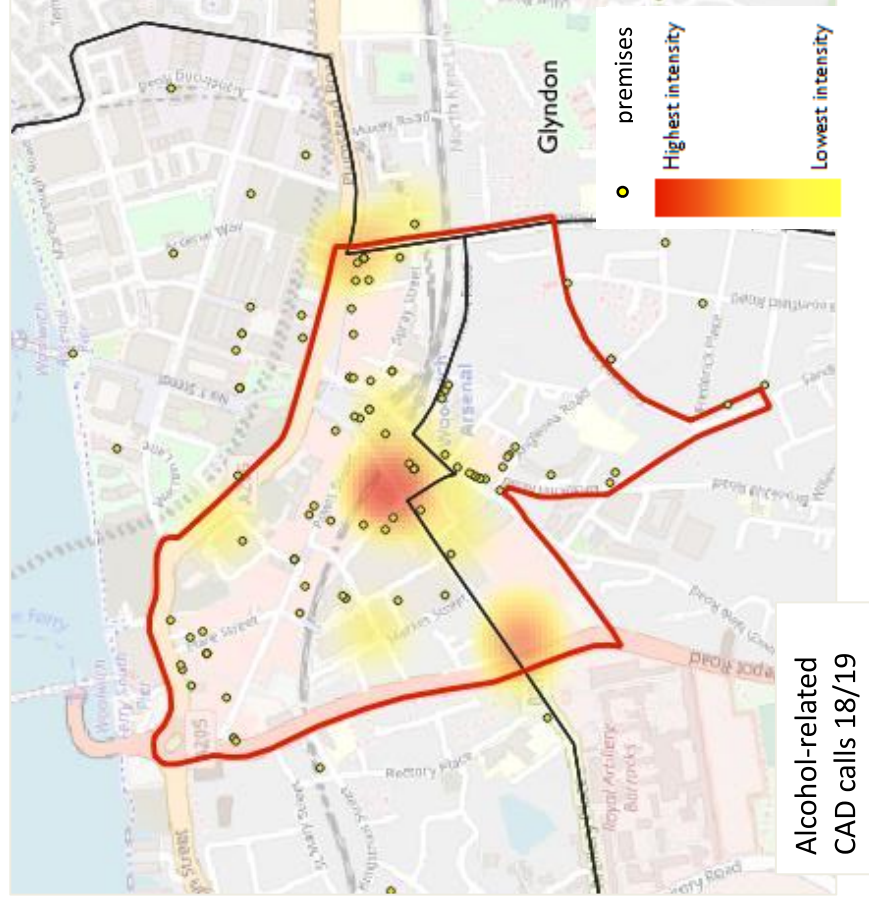
Woolwich Town Centre Cumulative Impact zone



The CIZ had been redrawn to remove areas that were included previously due to specific premises that are no longer trading. Spatially, alcohol-related offences have changed very little in the past five years.

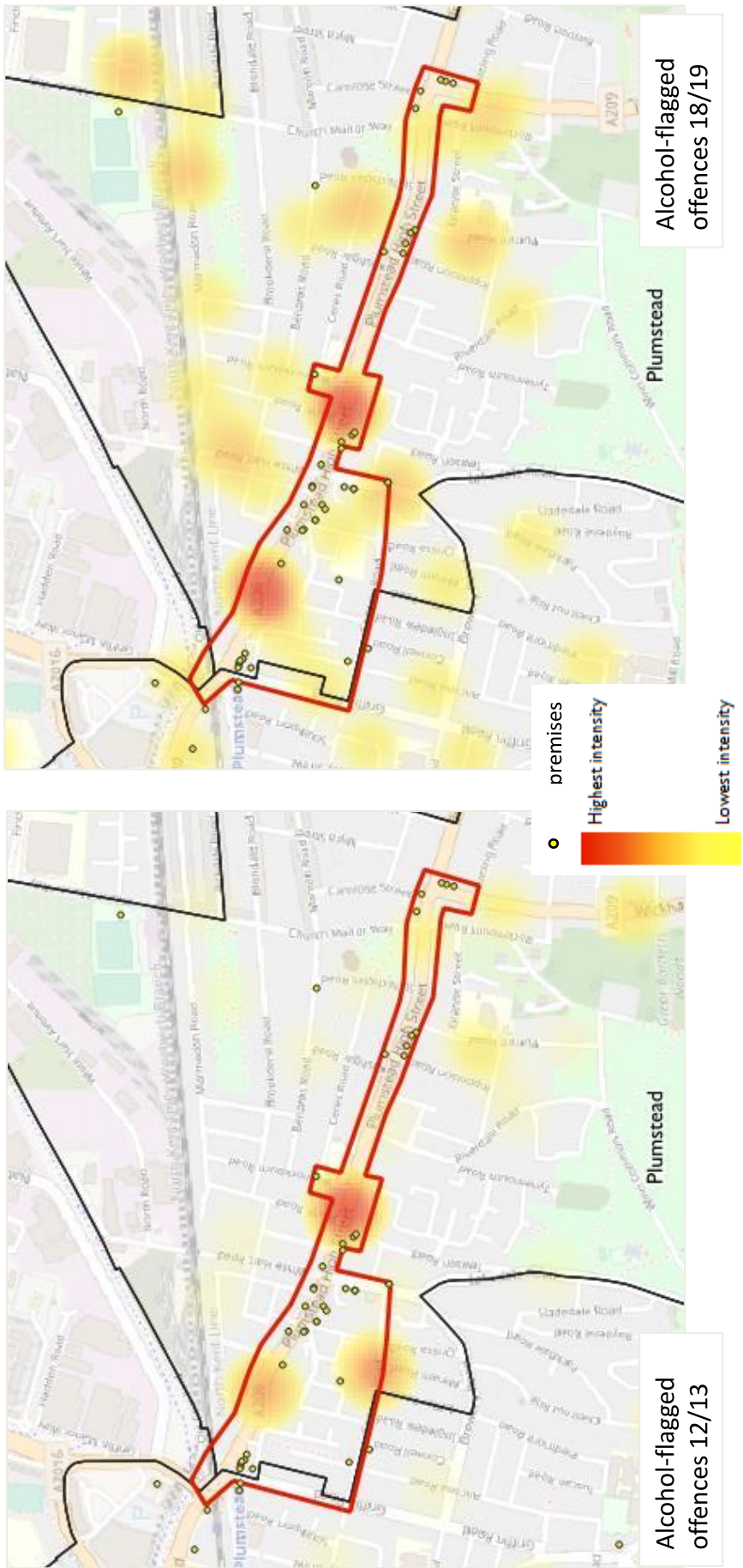


## Woolwich Town Centre Cumulative Impact zone



CAD callouts represent a more concentrated version of the offence hotspots within the CIZ. The additional noise complaints in the Royal Arsenal development do not warrant an extension of the CIZ, but should continue to be monitored as development progresses.

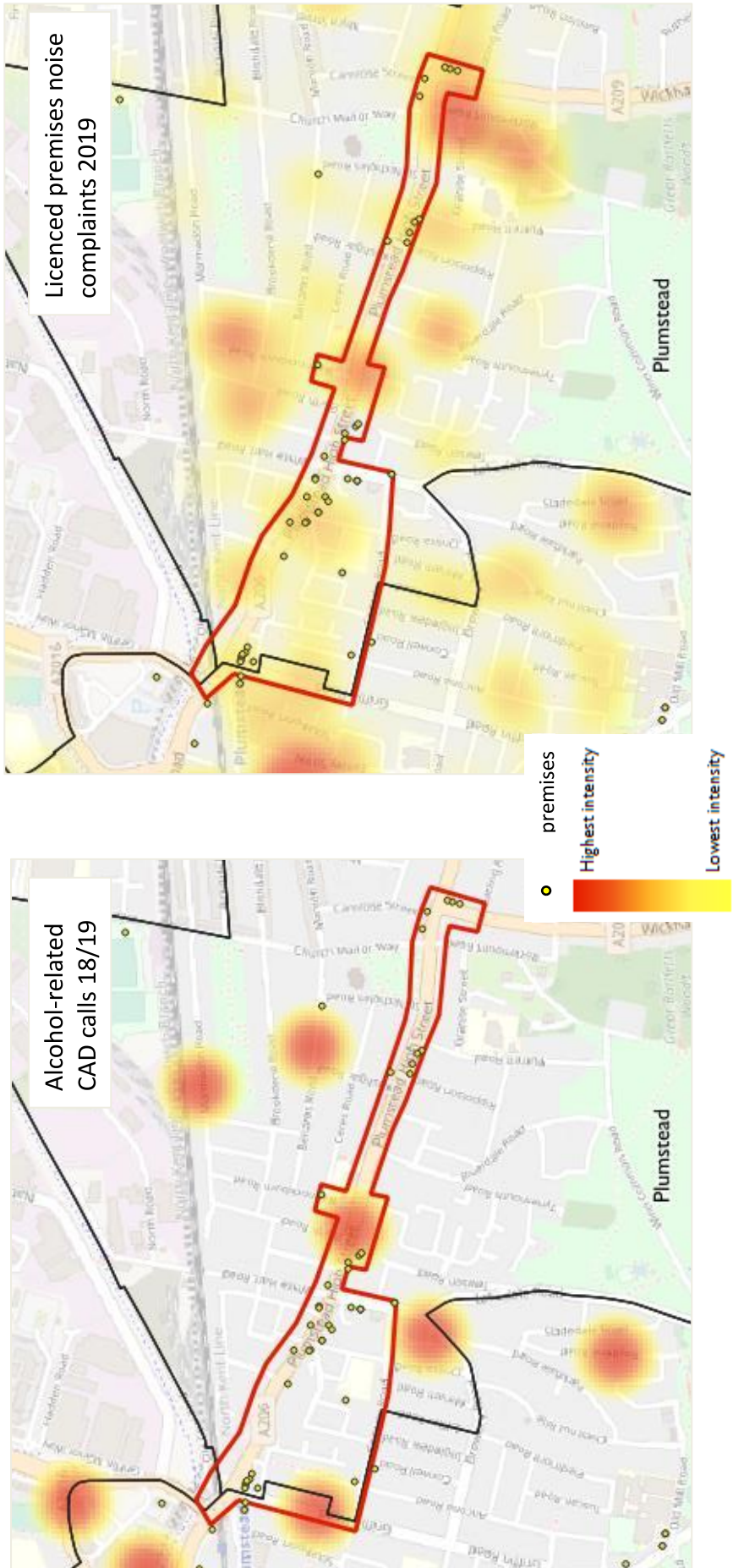
Plumstead High Street Cumulative Impact zone



Since 12/13, offences have spread to the area surrounding the CIZ, however the lack of premises and CAD calls does not warrant an extension of the CIZ.

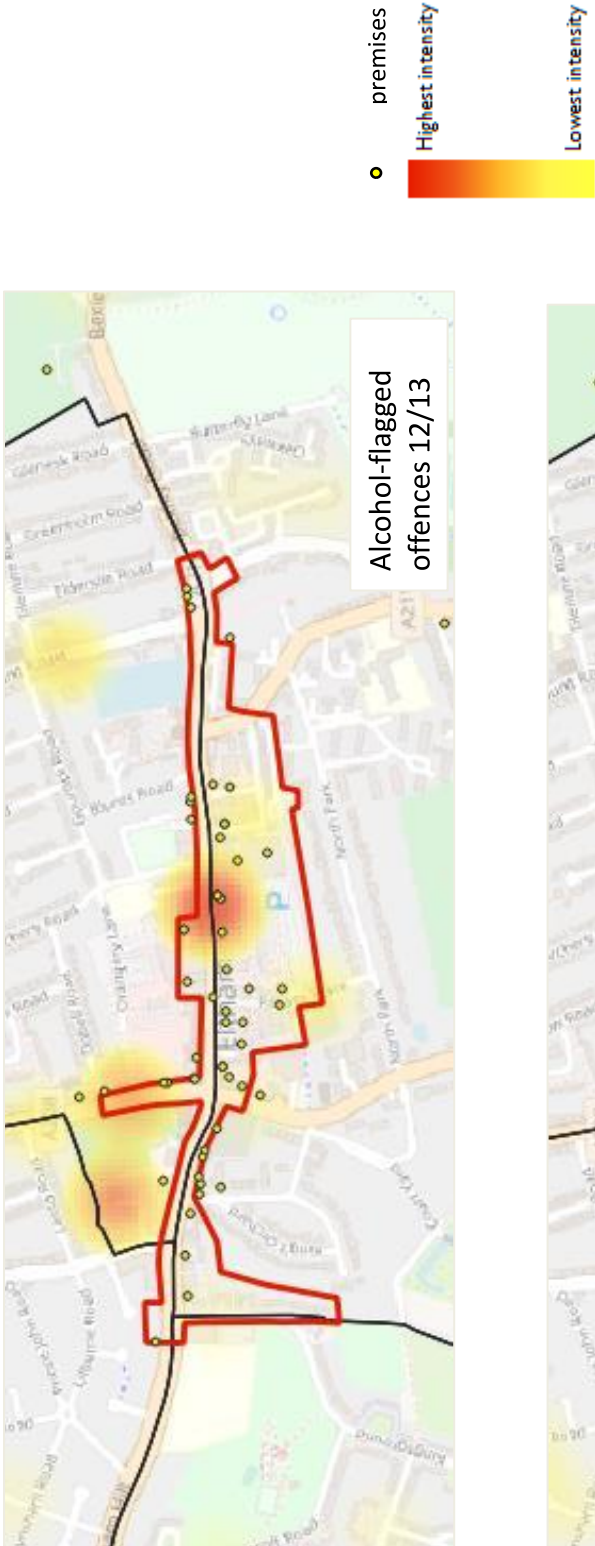


**Plumstead High Street Cumulative Impact zone**



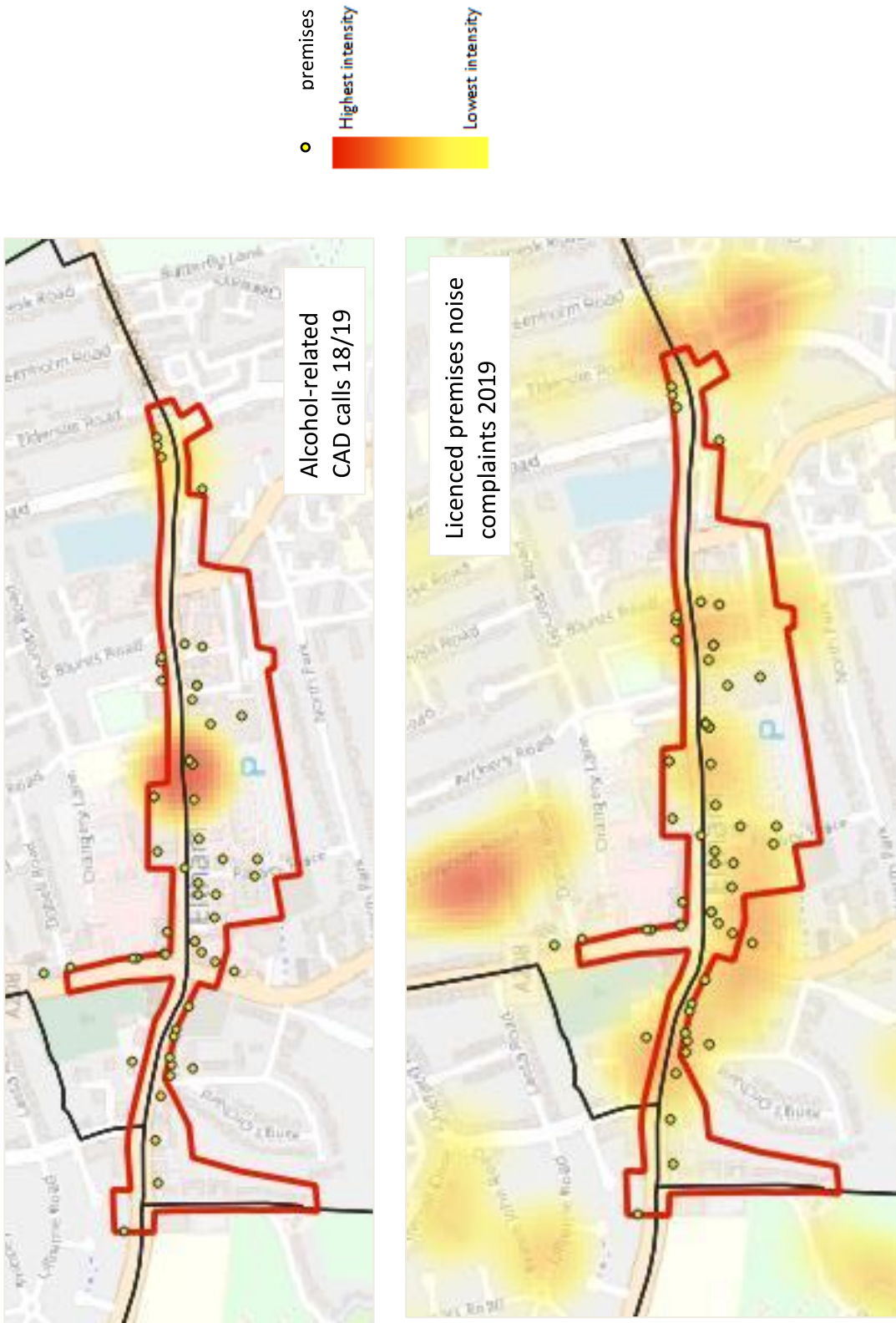
Noise complaints outside the CIZ are not in areas occupied by licenced premises. The dispersal of CAD calls and noise complaints mirror the spread of alcohol-flagged offences.

**Eltham High Street Cumulative Impact zone**



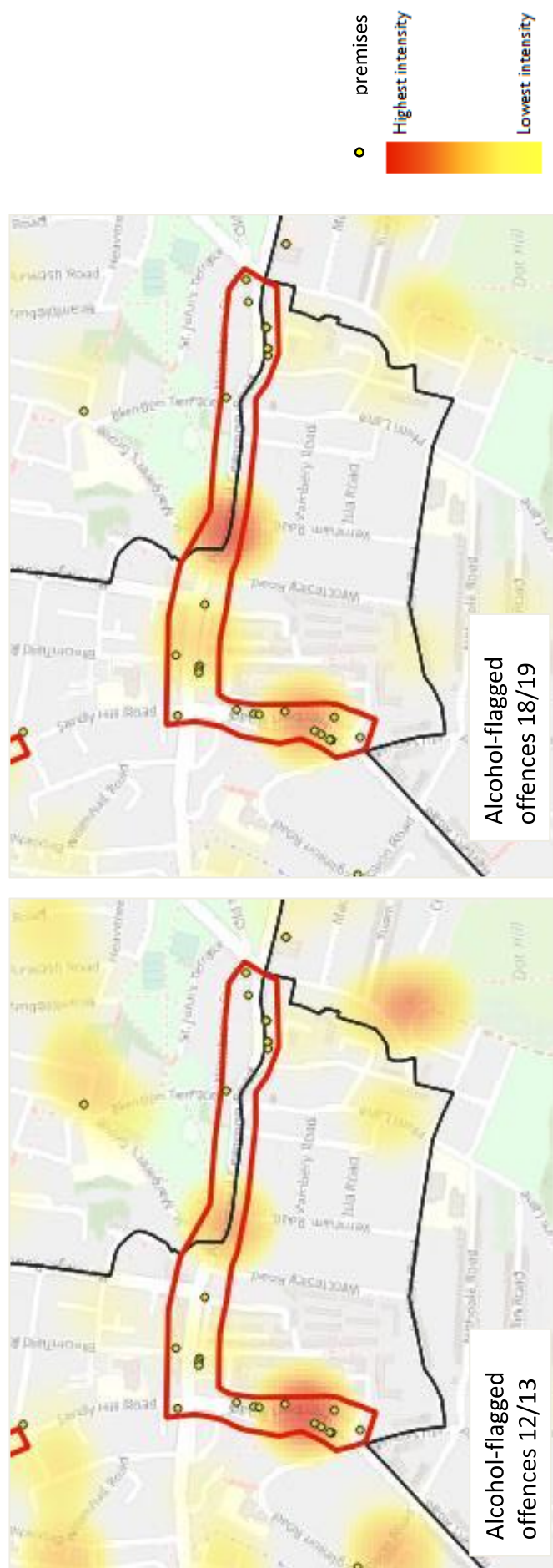
Offences are now concentrated within a few specific locations. The boundary of the CIZ has been amended to include some areas of higher offence and noise complaint concentrations.

Eltham High Street Cumulative Impact zone



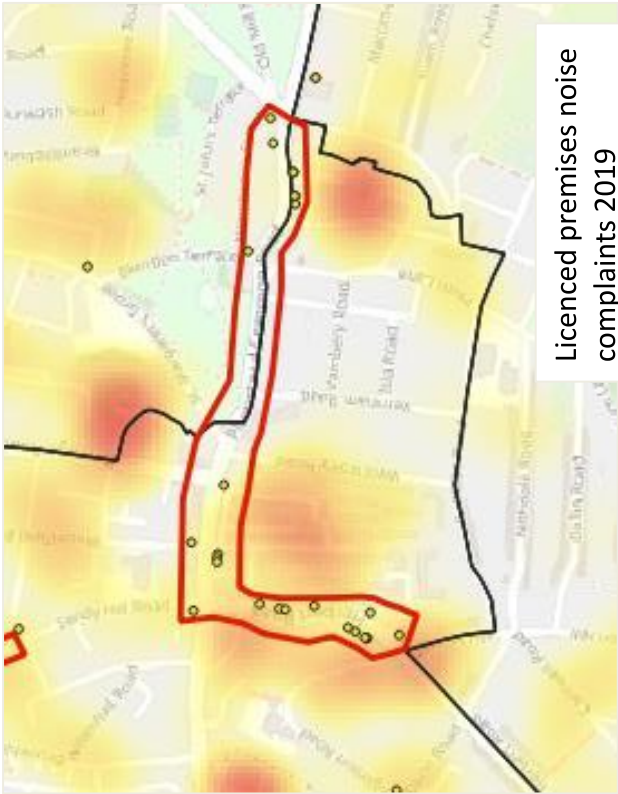
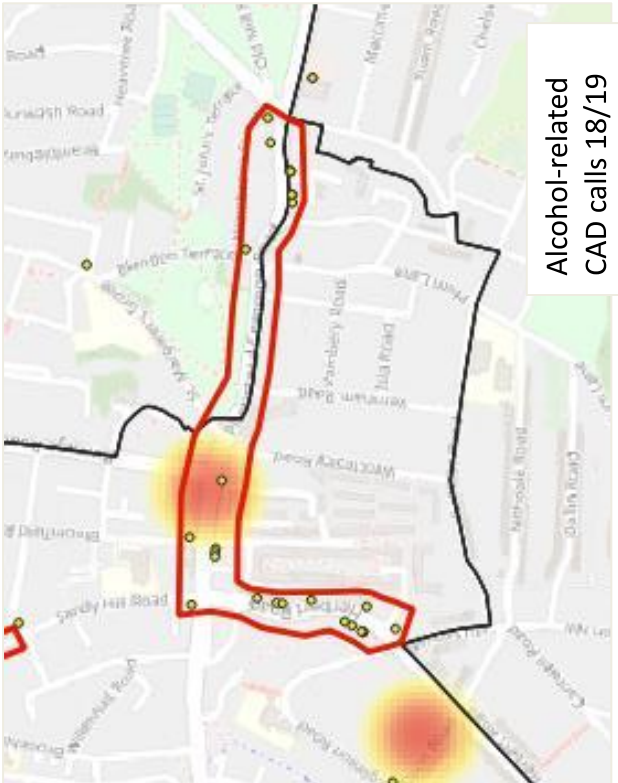


Herbert Road/Plumstead Common Road Cumulative impact zone



Offences are considerably more concentrated within the proposed CLZ area compared to 12/13. The proposed area captures the majority of the clusters of offences and also the concentrated premises to the east.

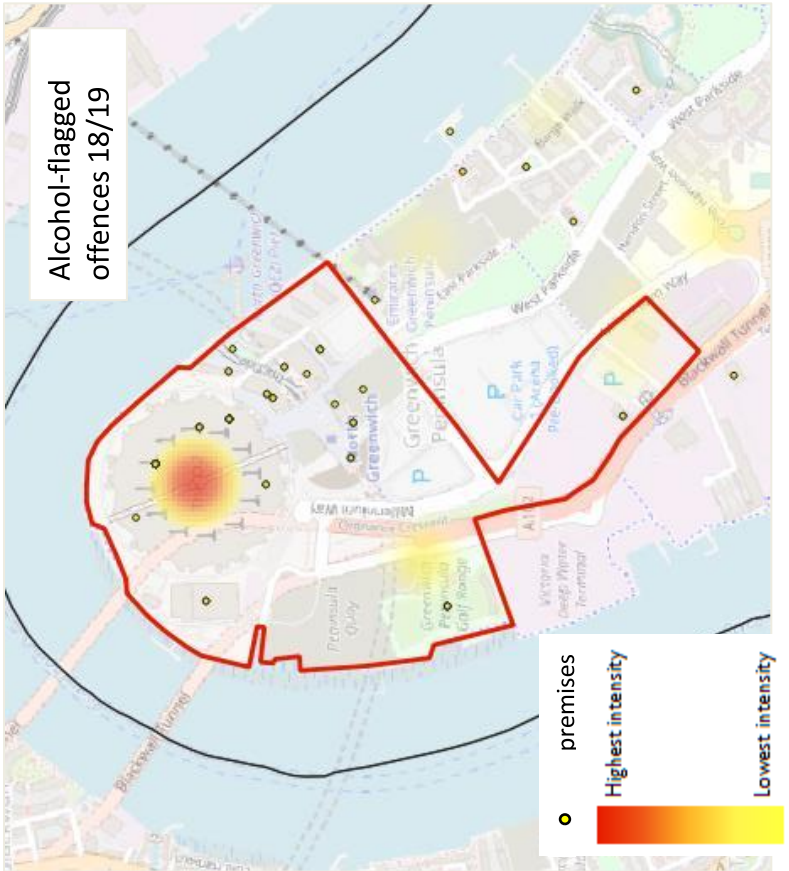
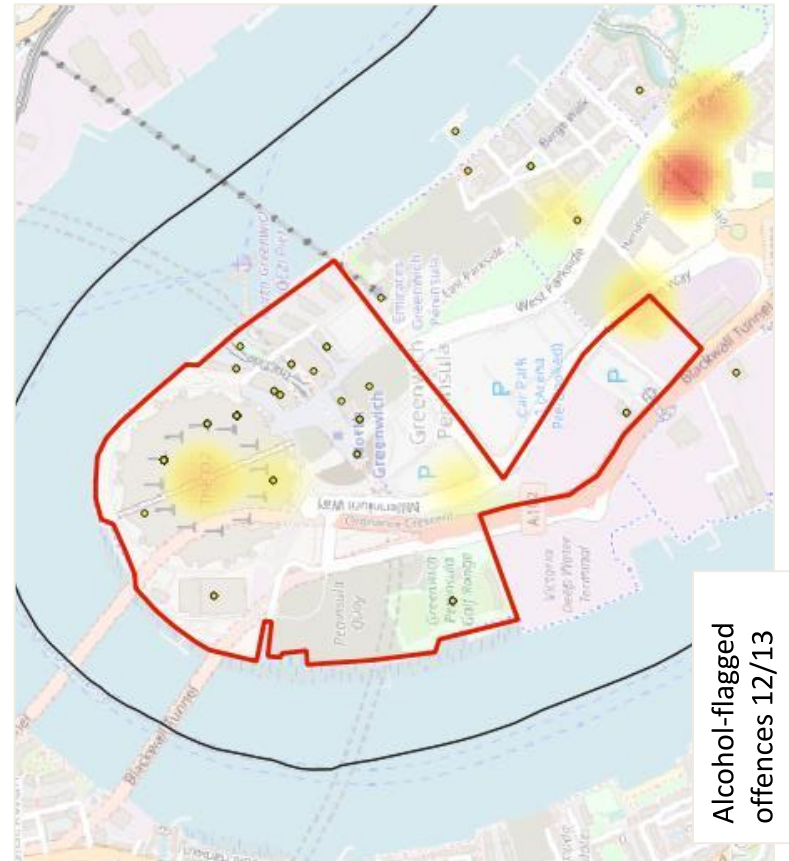
Herbert Road/Plumstead Common Road Cumulative impact zone



CAD calls are located in a similar area to the crime hotspots. Noise complaints are spread around the proposed CIZ. With few premises in the areas, it is likely caused by patrons of the premises within the proposed CIZ.

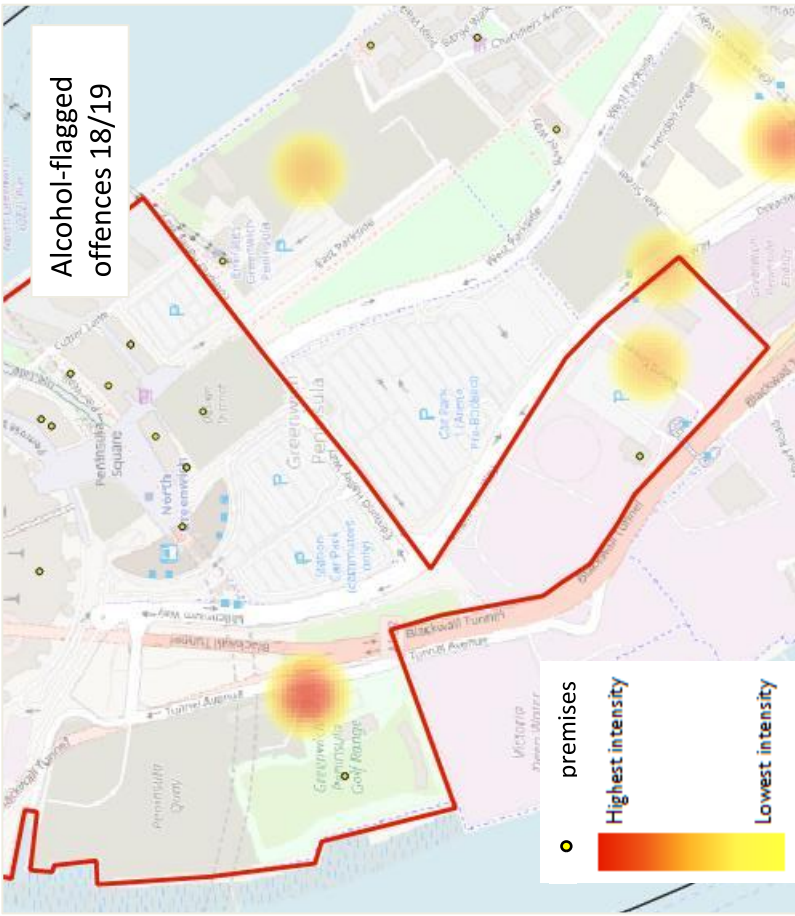


Peninsula Cumulative impact zone



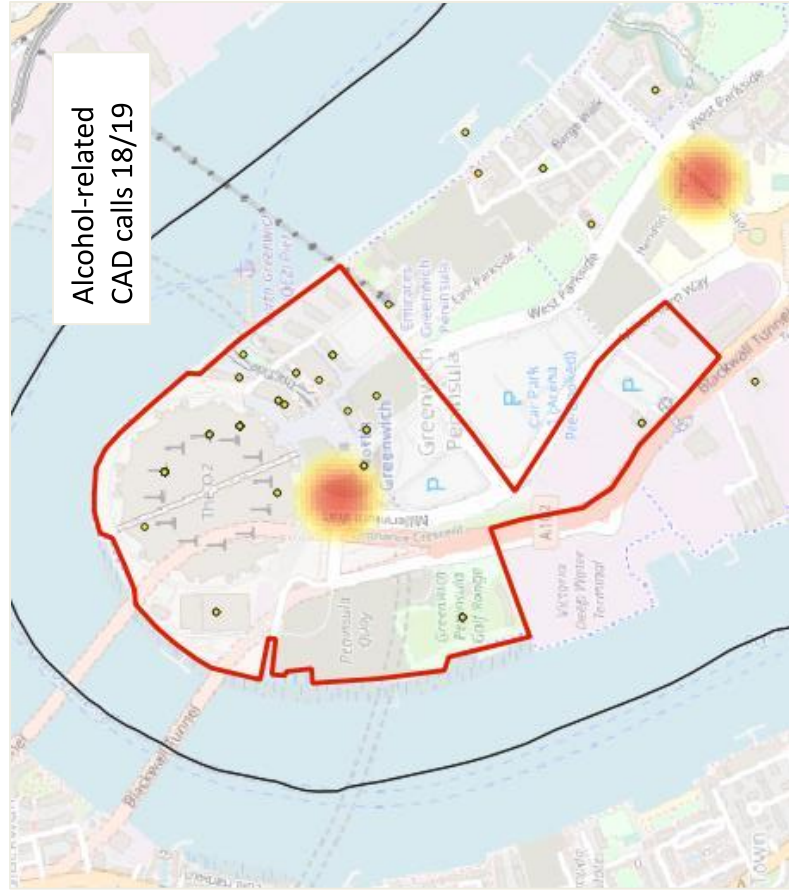
The hotspot at the O2 has become the largest generator of alcohol-related offences since the previous study in 2012/13.

Peninsula Cumulative impact zone

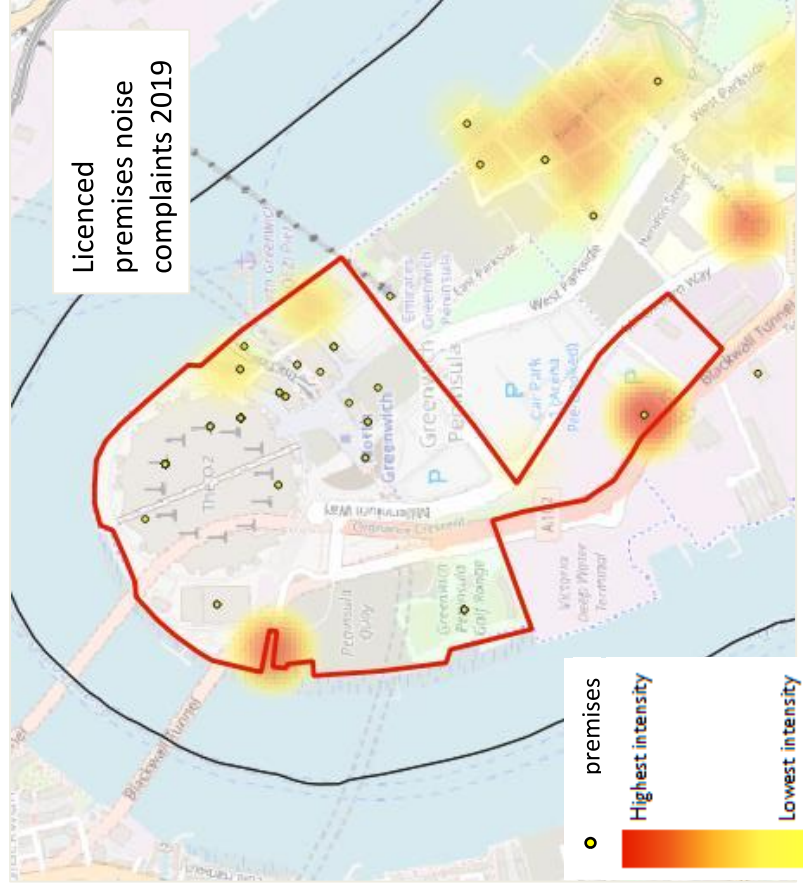


Once the O2 itself is removed, other hotspots within the proposed area become more evident and justify the extension south of the immediate O2 area.

Peninsula Cumulative impact zone



Alcohol-related  
CAD calls 18/19



Licenced  
premises noise  
complaints 2019

Noise complaints around the Jetty and student halls of residence, but low instances of crime, preclude inclusion within the new CIZ.



# Analysis of Alcohol Related Crime and Anti-social Behaviour Within Cumulative Impact Zones in the Royal Borough of Greenwich (March 2022)

Data contained within this report should not be shared without the prior  
permission of the report author.

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Telephone:	020 8921 3942
e-mail:	david.hodges@royalgreenwich.gov.uk

## Cumulative impact Zones

The maps below indicate the locations of the Cumulative Impact Zones within Royal Greenwich.

Overall Royal Borough of Greenwich:





## Greenwich Town Centre:

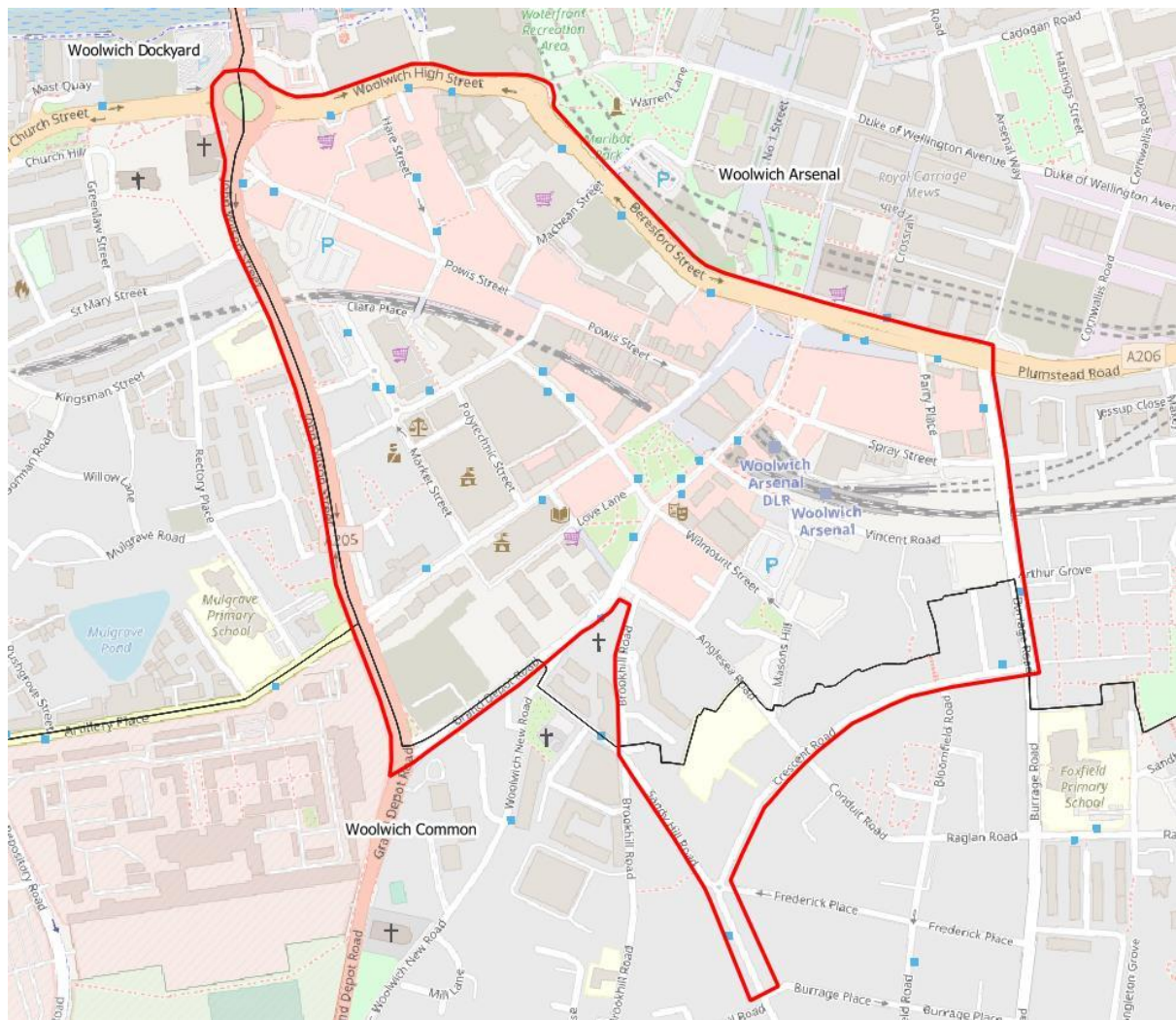


Trafalgar Road:

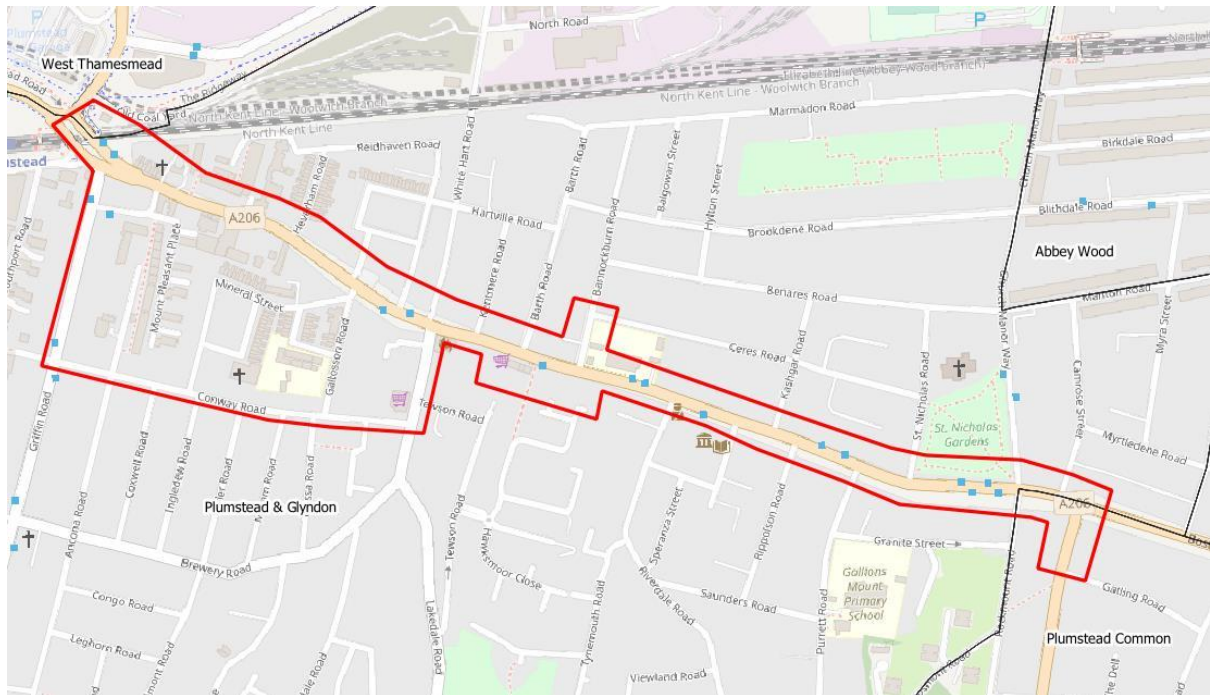




## Woolwich Town Centre:

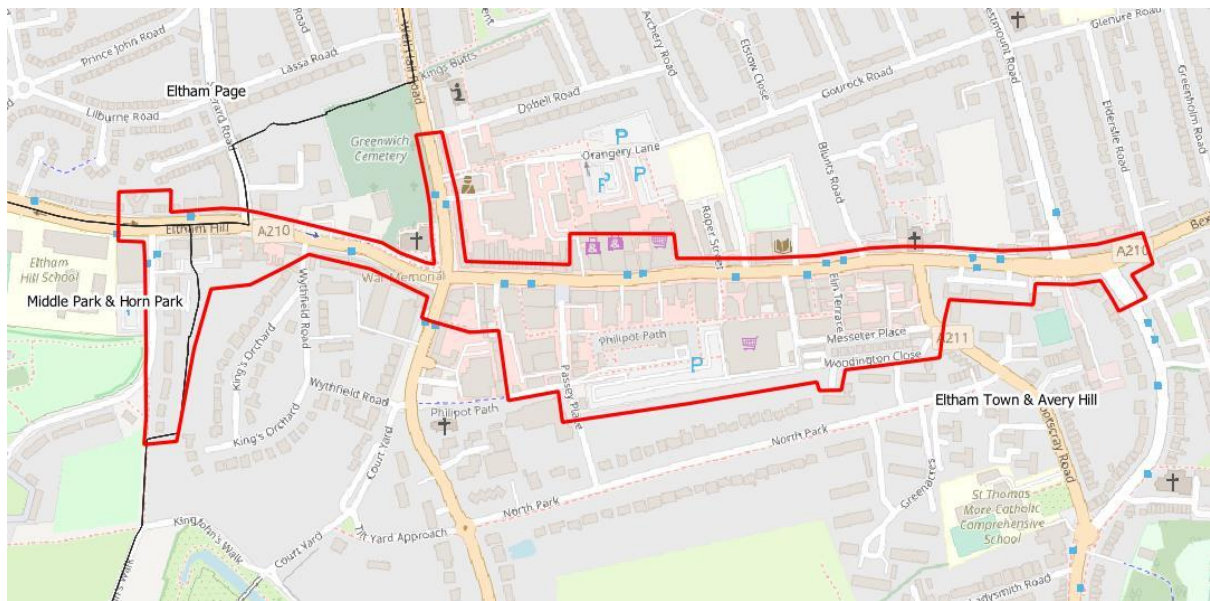


## Plumstead High Street:

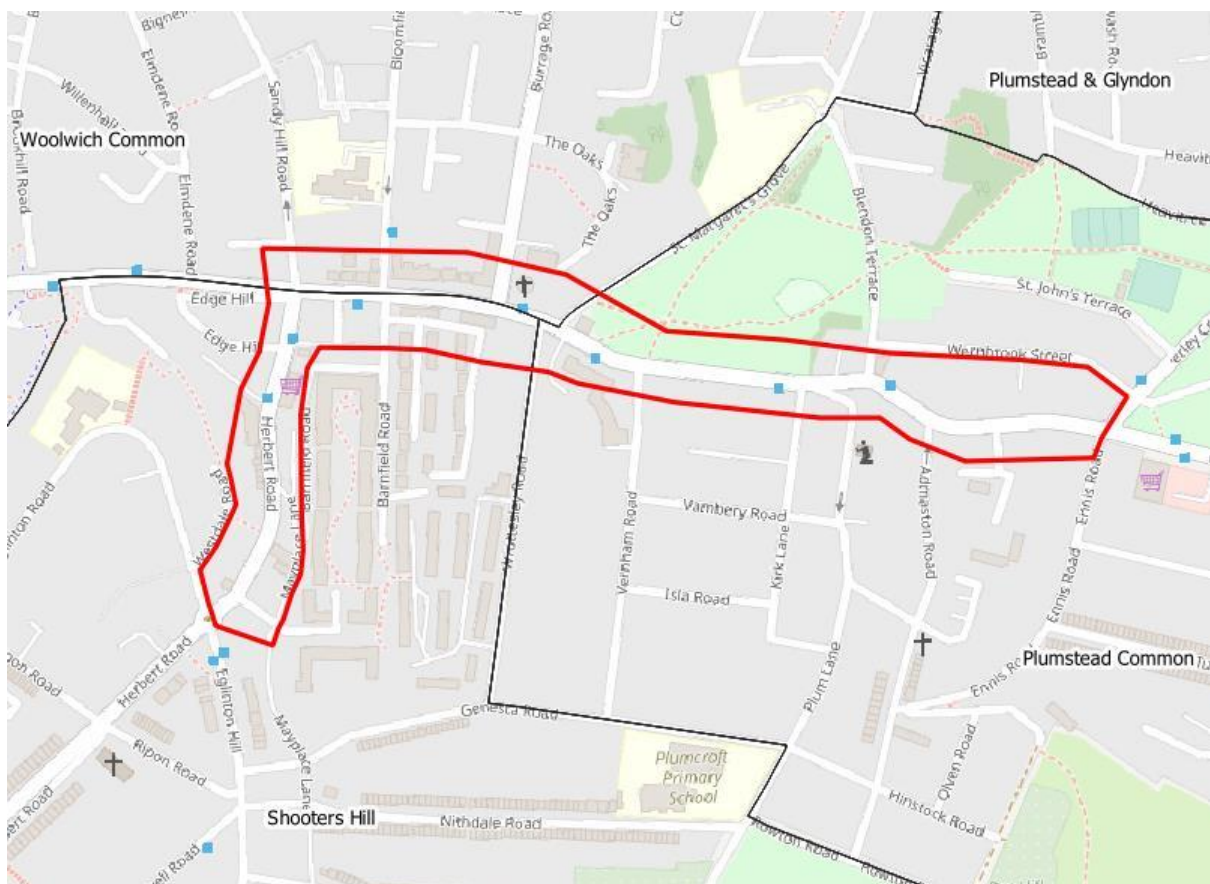




## Eltham High Street:



## Herbert Road/Plumstead Common Road:



Peninsula:



## Methodology

The Cumulative Impact Zones (CIZs) were drawn tightly to the area that contained the licensed premises with the intent of limiting coverage of residential areas and to make the data analysed most relevant to the public area of the zone.

To establish a spatial element to the analysis of the data the zones were measured using km<sup>2</sup> to allow a direct comparison between areas of different sizes and compare proportionally to the Royal Borough of Greenwich.

Crime Data were extracted from the Police crime recording system (CRIS) and are based on Home Office classifications. From this data, a subset of data where alcohol was involved were created to identify offences where the victim, suspect or both had been drinking and where key words relating to alcohol are identified. The data with an alcohol indicator has then been further analysed over the crime groups. This dataset has been described in the document as “alcohol-related crime”. The offence data cover March 1<sup>st</sup> 2021 to February 28<sup>th</sup> 2022.

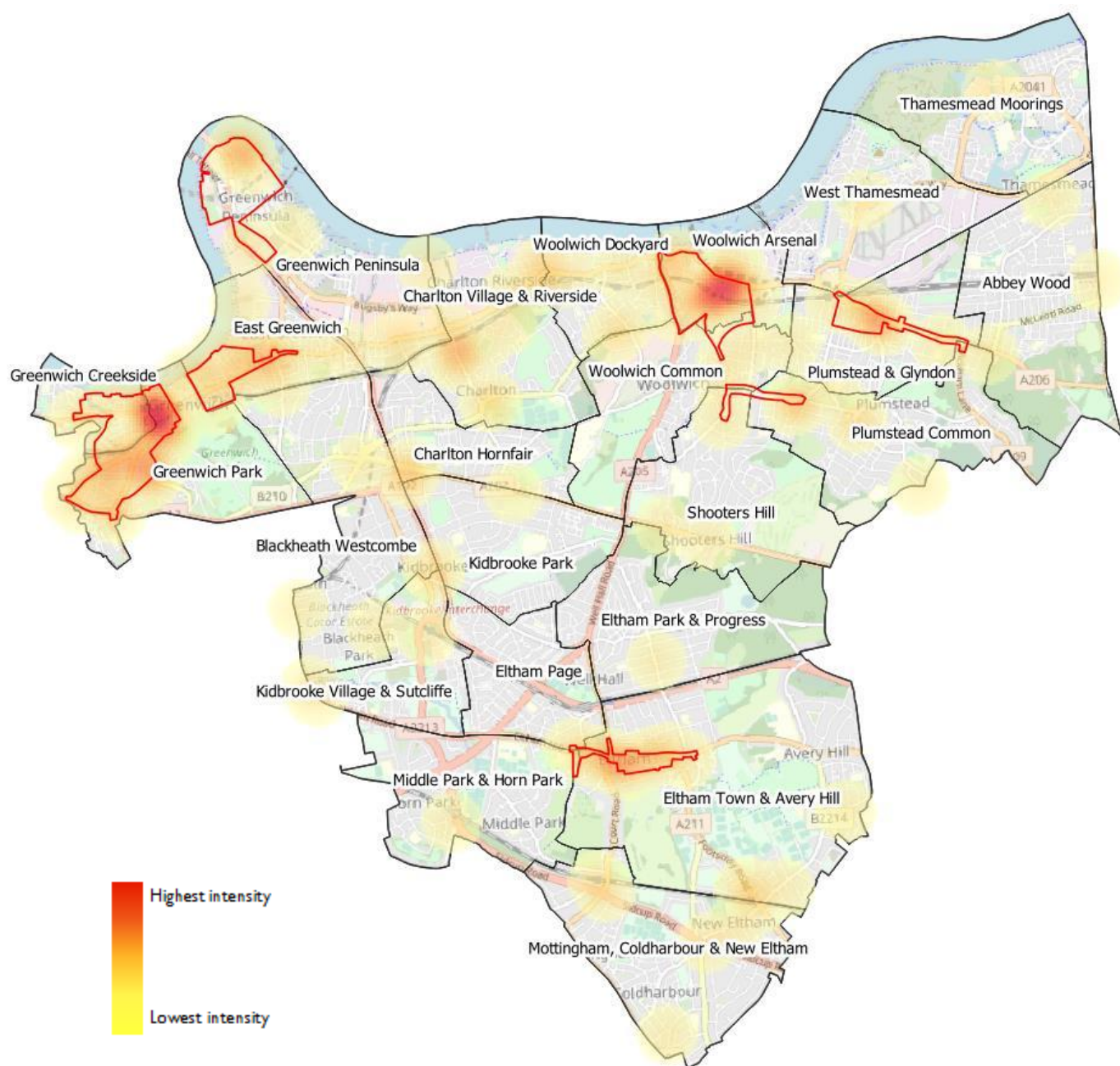
London Ambulance Service (LAS) data were also analysed where incidents were flagged as being ‘alcohol related’. This information was available through the MOPAC SafeStats database and is refined to Output Area level. Although less geographically precise than the CRIS records, the LAS data was used to corroborate the most significant locations for alcohol incidents. This data is from 1<sup>st</sup> March 2021 to 28<sup>th</sup> February 2022.

Noise data covering the period 1<sup>st</sup> March 2021 to 28<sup>th</sup> February 2022 were provided by the Royal Borough of Greenwich Council’s Community Protection Team. This dataset contains complaints made by the public to the council about noise created by on-license premises.



## Background Information

### Distribution of licensed premises in the Royal Borough of Greenwich as of March 2022

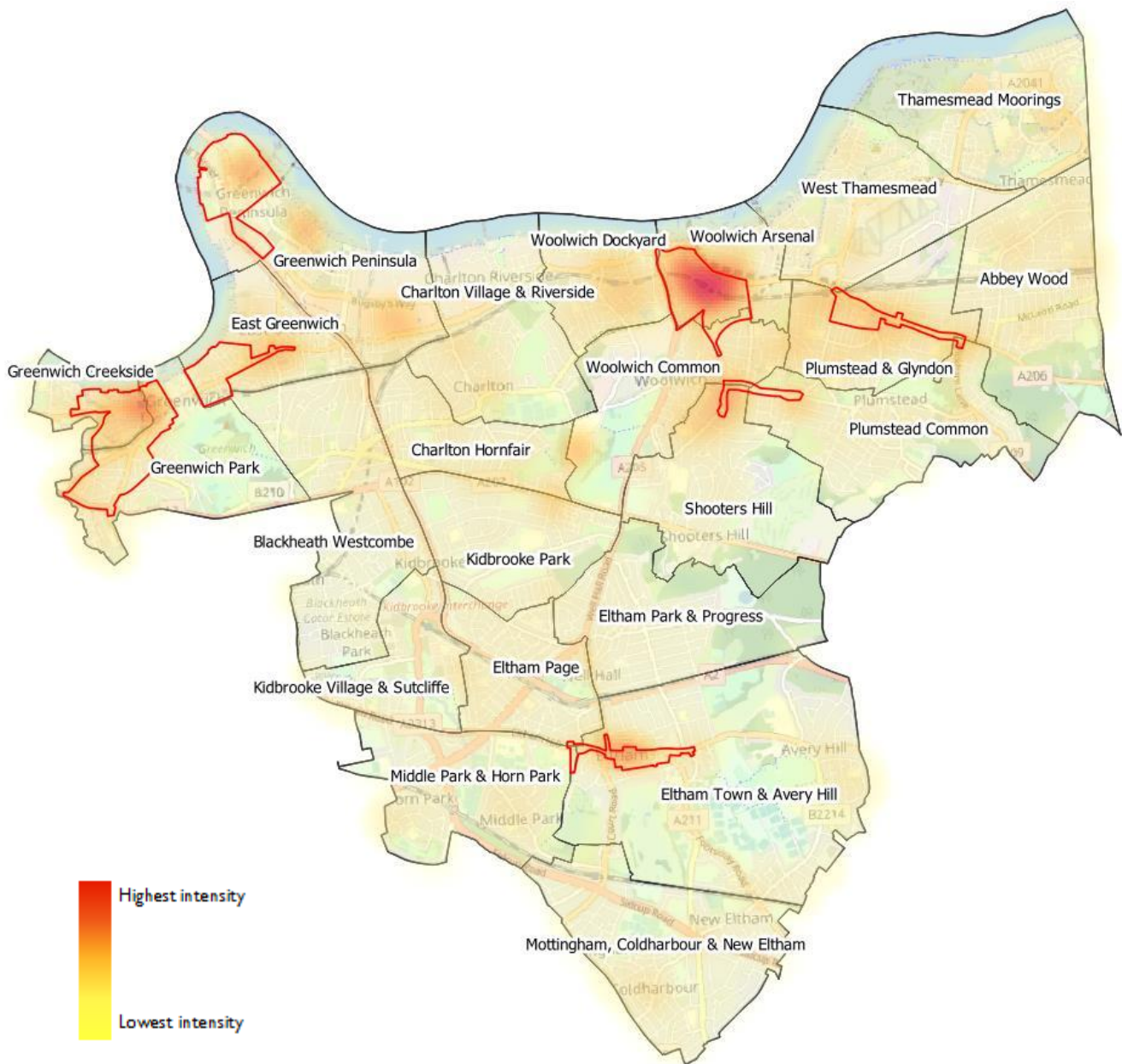


The current CIZs clearly capture the areas within Royal Greenwich that have a high concentration of licenced premises.

### Hotspots of all recorded crime in the Royal Borough of Greenwich



March 2021 to February 2022



The areas with the highest concentrations of recorded crime fall within the proposed CIZs. Areas with high concentrations of recorded crime that do not have large numbers of licenced premises, such as Charlton or Abbey Wood, would not be considered for a CIZ.

**Data summary including breakdown by percentage and per km<sup>2</sup>**  
**March 2021 to February 2022**

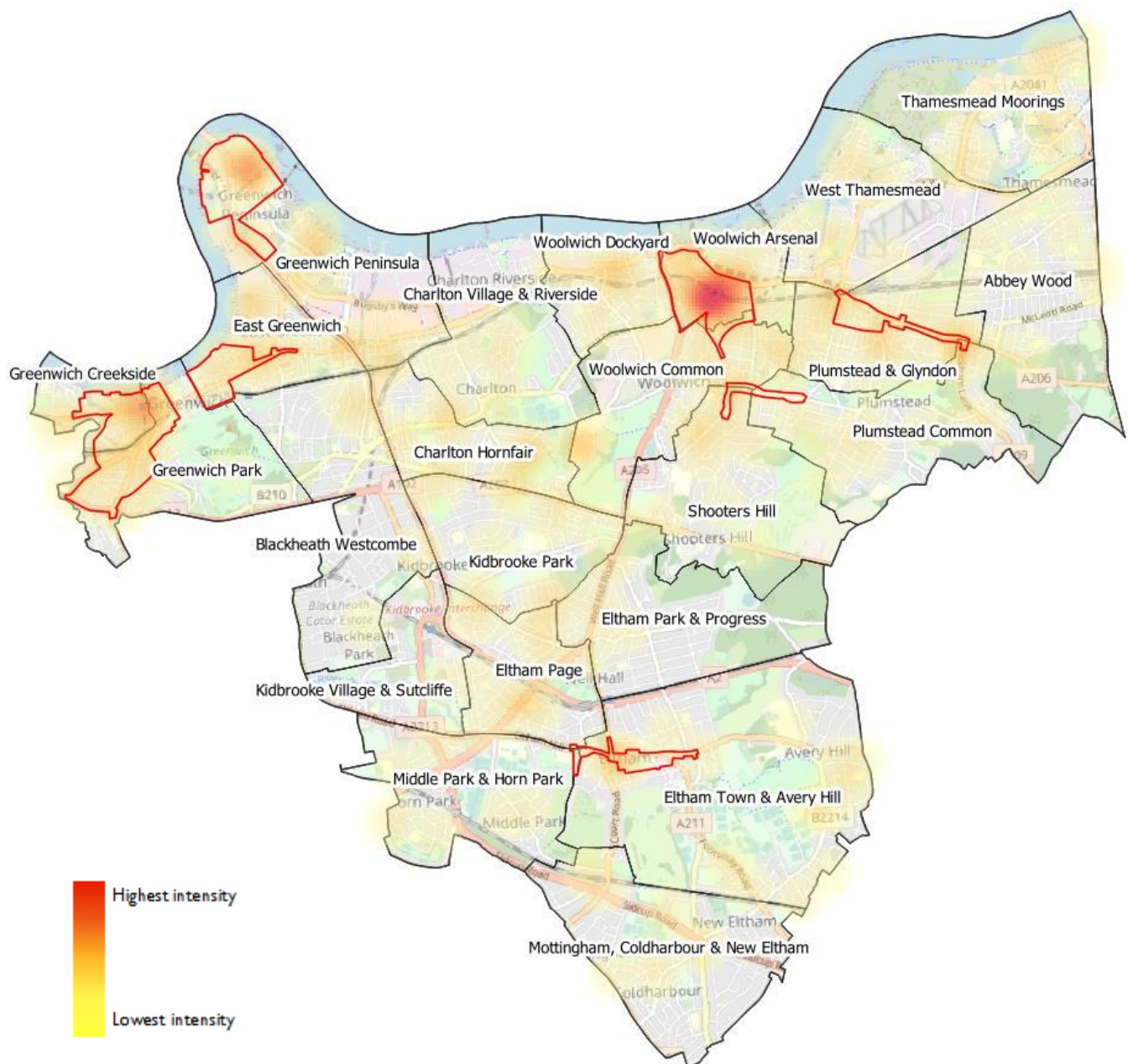
CIZ Name	Area (km <sup>2</sup> )	Total Notifiable Offences			Alcohol-Related Offences		
		Offences	%	Per km <sup>2</sup>	Offences	%	Per km <sup>2</sup>
Greenwich Town Centre	0.73	1349	4.9%	1847.95	29	7.9%	39.73
Eltham High Street	0.15	444	1.6%	2960.00	6	1.6%	40.00
Peninsula	0.51	663	2.4%	1300.00	16	4.3%	31.37
Herbert Road/ Plumstead Common Road	0.08	231	0.8%	2887.50	3	0.8%	37.50
Plumstead High Street	0.18	429	1.5%	2383.33	7	1.9%	38.89
Trafalgar Road	0.25	320	1.2%	1280.00	6	1.6%	24.00
Woolwich Town Centre	0.48	1680	6.1%	3500.00	33	9.0%	68.75
None	44.98	22592	81.5%	502.27	268	72.8%	5.96

CIZ Name	Area (km <sup>2</sup> )	Licenced Premises			Noise Complaints		
		Number	%	Per km <sup>2</sup>	Number	%	Per km <sup>2</sup>
Greenwich Town Centre	0.73	35	16.3%	47.95	14	25.9%	19.18
Eltham High Street	0.15	14	6.5%	93.33	0	0.0%	0.00
Peninsula	0.51	6	2.8%	11.76	5	9.3%	9.80
Herbert Road/ Plumstead Common Road	0.08	8	3.7%	100.00	1	1.9%	12.50
Plumstead High Street	0.18	8	3.7%	44.44	2	3.7%	11.11
Trafalgar Road	0.25	11	5.1%	44.00	2	3.7%	8.00
Woolwich Town Centre	0.48	26	12.1%	54.17	6	11.1%	12.50
None	44.98	107	49.8%	2.38	24	44.4%	0.53

The licensed premises within the CIZs account for 50.2% of all licensed premises within the Royal Borough, despite the CIZs accounting for just 5.0% of the total area. Similarly, they contain 27.2% of alcohol-related offences (decreased from 31.3% in 2018/19). Despite the smallest area covered, the new Herbert Road/Plumstead Common Road CIZ maintains the highest number of premises and offences per square kilometre.

## Alcohol-Related Crime

Hotspots of all recorded alcohol-flagged crime in the Royal Borough of Greenwich  
March 2021 to February 2022



Offences around existing CIZs have remained consistent with the previous reporting period.

## Temporal Analysis of alcohol-related offences

March 2021 to February 2022

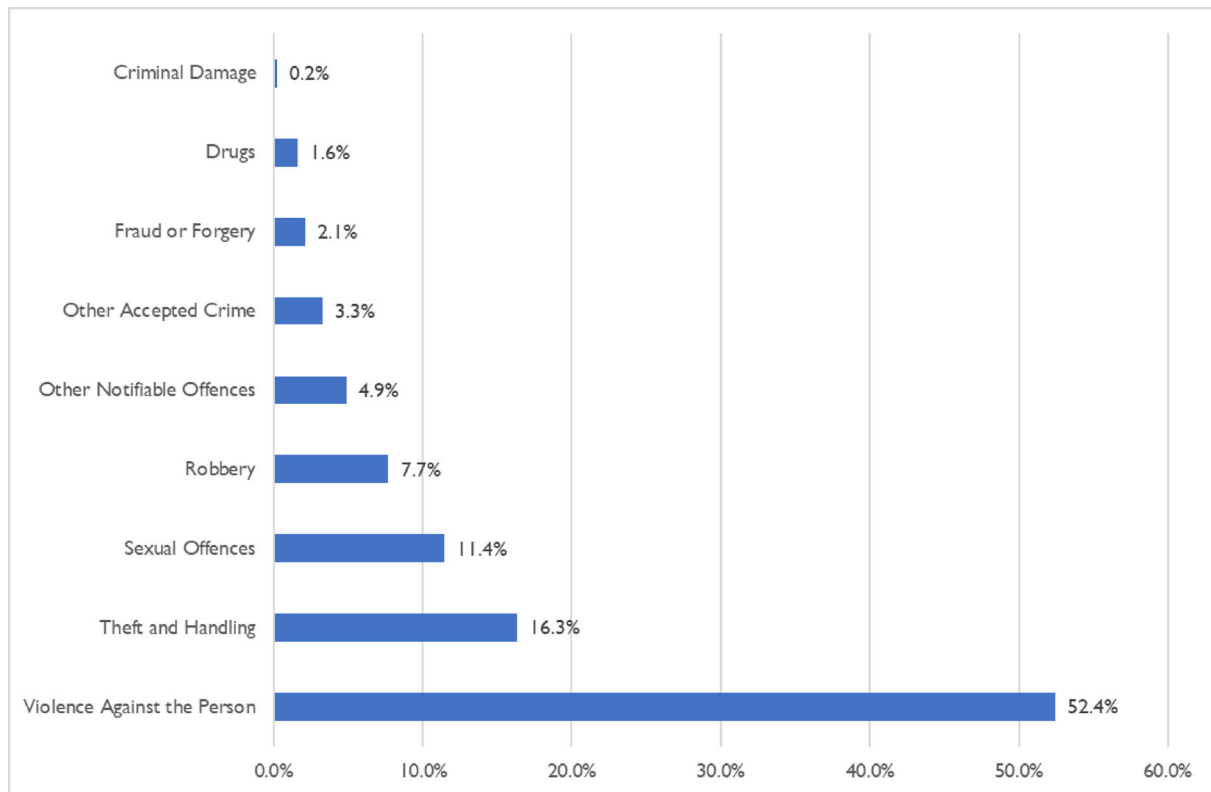
Time	Mon	Tue	Wed	Thu	Fri	Sat	Sun	Total	%
00:00-00:59	5	8	0	5	3	14	11	46	12.50%
01:00-01:59	2	2	2	2	2	6	8	24	6.52%
02:00-02:59	3	0	0	1	3	6	3	16	4.35%
03:00-03:59	1	3	3	2	2	0	2	13	3.53%
04:00-04:59	0	3	3	0	0	6	3	15	4.08%
05:00-05:59	1	2	3	1	1	1	2	11	2.99%
06:00-06:59	2	0	0	0	1	2	2	7	1.90%
07:00-07:59	2	1	0	0	0	1	1	5	1.36%
08:00-08:59	1	0	1	1	1	0	1	5	1.36%
09:00-09:59	3	0	1	1	0	3	0	8	2.17%
10:00-10:59	0	0	0	0	0	1	2	3	0.82%
11:00-11:59	1	0	1	2	0	0	0	4	1.09%
12:00-12:59	1	1	0	1	1	0	1	5	1.36%
13:00-13:59	1	1	0	2	1	0	1	6	1.63%
14:00-14:59	1	1	0	0	0	1	1	4	1.09%
15:00-15:59	1	1	1	5	3	4	1	16	4.35%
16:00-16:59	3	2	0	3	1	1	4	14	3.80%
17:00-17:59	0	2	3	2	2	3	6	18	4.89%
18:00-18:59	1	2	0	5	5	3	2	18	4.89%
19:00-19:59	3	2	3	3	2	7	4	24	6.52%
20:00-20:59	1	2	5	2	5	7	7	29	7.88%
21:00-21:59	4	3	4	0	3	7	6	27	7.34%
22:00-22:59	2	2	1	2	6	5	2	20	5.43%
23:00-23:59	2	2	8	1	6	6	5	30	8.15%
<b>Total</b>	<b>41</b>	<b>40</b>	<b>39</b>	<b>41</b>	<b>48</b>	<b>84</b>	<b>75</b>		
<b>%</b>	<b>11.14%</b>	<b>10.87%</b>	<b>10.60%</b>	<b>11.14%</b>	<b>13.04%</b>	<b>22.83%</b>	<b>20.38%</b>		

The peak days and times for offences are on Friday, Saturday and Sunday evenings between 19:00 and 02:00. This mirrors the national picture for alcohol-related offences. There is a slightly higher proportion of these offences on Monday, Tuesday, Wednesday and Thursday. This is likely a lasting effect of the COVID-19 pandemic.



## Alcohol related crime in the Royal Borough of Greenwich by type

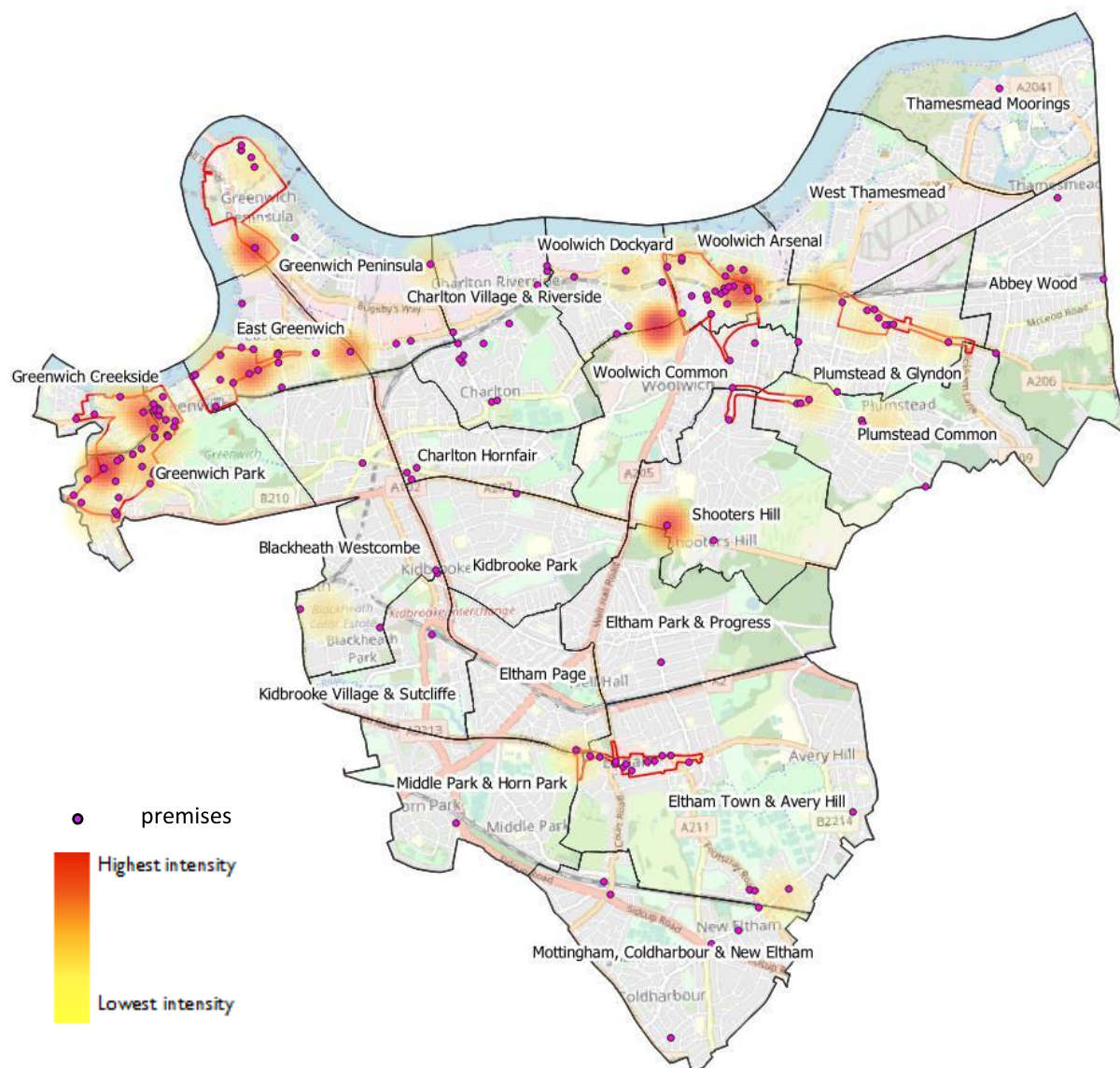
March 2021 to February 2022



There has been a reduction in the proportion of violence against the person offences – in the previous report, these made up almost two thirds of all alcohol-related offences within Royal Greenwich. The prevalence of high-harm offences associated with alcohol necessitates the CIZ policy to ensure that these risks are mitigated.

## Noise Complaints recorded by the RBG Noise Team

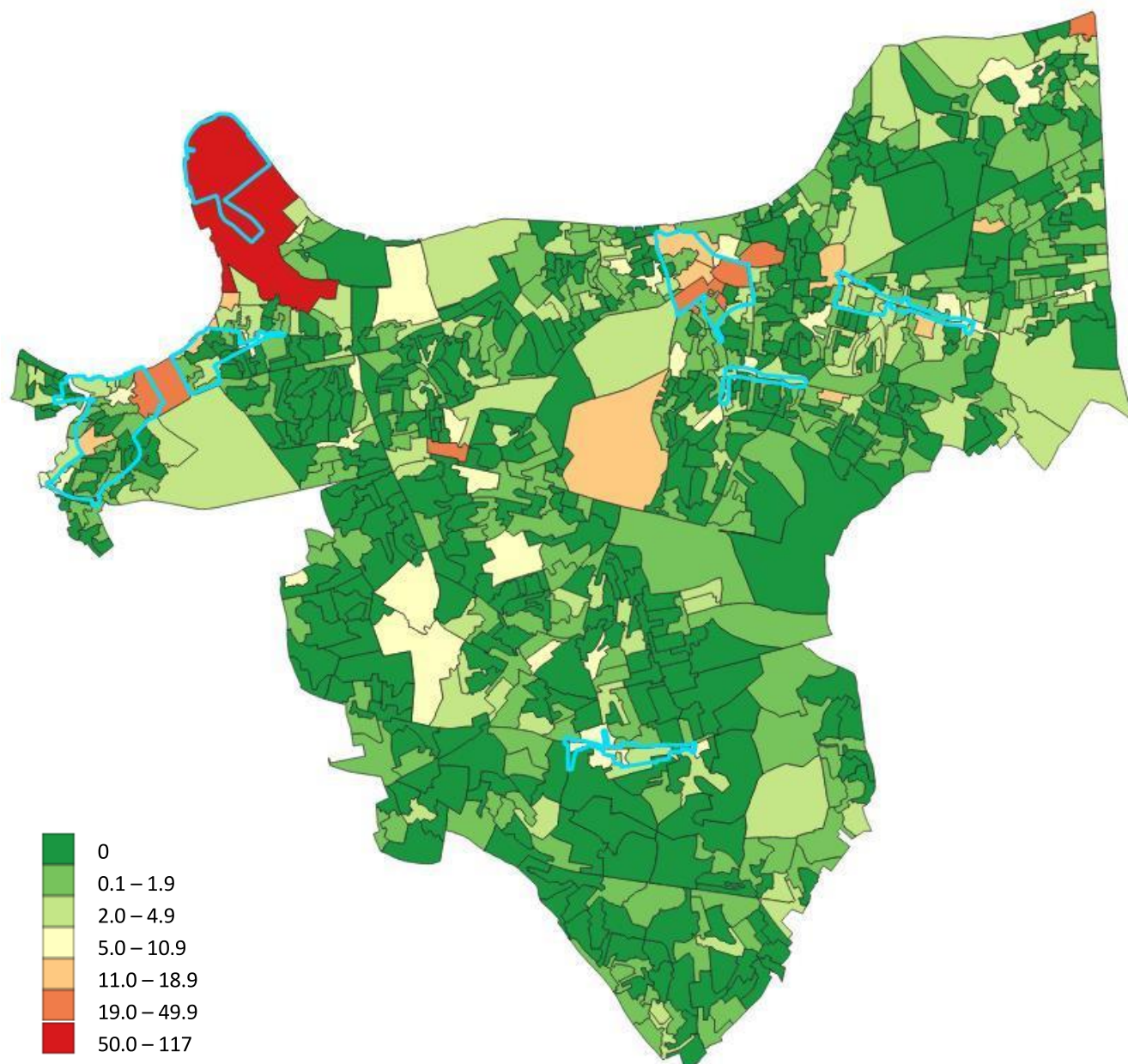
Volume of noise incidents reported to the Royal Borough of Greenwich Noise Team  
March 2021 to February 2022



The increase in noise complaints from the O2 area is likely a result of the increase in residential development by Knight Dragon at the north of the peninsula. As this area continues to grow in terms of residential properties, calls to Royal Greenwich Noise Team are expected to increase.

## London Ambulance Service Alcohol Data

Number of alcohol related ambulance callouts by Output Area March 2021 to February 2022



The OAs which have the highest number of alcohol-related incidents generally represent the areas selected for CIZs. The areas of exception such as the south of Charlton, Woolwich Common (driven by the Queen Elizabeth Hospital) and north Thamesmead do not have sufficient premises to be considered for an additional CIZ.

*Note, whilst more than one ambulance may be called to an incident, only the first call was recorded. The map is produced using Natural Breaks (Jenks) algorithm. This tries to find natural groupings of data to create classes.*

*The resulting classes will be such that there will be maximum variance between individual classes and least variance within each class.*