

From: Moore, Ray

Sent: Monday, May 20, 2019 8:55 AM

To: [REDACTED] Regen, Licensing; Alcohol@homeoffice.gsi.gov.uk ; Qau Safeguarding; Costin, Holly; DIP Team; FireSafetyRegulationSE@london-fire.gov.uk (FSR-AdminSupport@london-fire.gov.uk); Graham White; Highwayslicensing; Moore, Ray; Planning.Enquiries; Public Health Licensing; Reg Env Protection; Reg Health and Safety; southwark.repro@pbms.co.uk; Taylor, Dan; Tear, Jayne; West Team diary

Subject: FW: Application for a premises license for Spedie Shack, External Trading Area, Outside Surrey Quays Shopping Centre - application reference 868113

As a responsible authority under the Licensing Act 2003, Trading Standards are in receipt of an application from Robert Wennberg for an application to sell alcohol from 07:30 hours to 23:00 hours, Monday to Sunday (inclusive) from a converted container outside Surry Quays Shopping Centre. In the licensing objectives there is only the following references wrt the methods for preventing minors from obtaining alcohol "Comply with regulations and best practice. Implement age verification scheme." Having an age verification policy is a mandatory licensing condition. Trading Standards are therefore making representations wrt the licensing conditions "The Protection of Children from Harm" and "The prevention of Crime and Disorder." Trading Standards would rather a more detailed description of how sales of alcohol to minors can be prevented.

This authority would therefore ask that the following conditions are added to create a more robust system to ensure that alcohol is not sold to children:-

- That a challenge 25 scheme shall be maintained at the stalls selling alcohol requiring that staff selling alcohol request that any customer who looks under 25 years old, and who is attempting to purchase alcohol, provides valid photographic identification proving that the customer is at least 18 years old. Valid photographic identification is composed of a driving licence, passport, UK armed services ID card and any Proof of Age Standards Scheme (PASS) accredited card such as the Proof of Age London (PAL) card.
- That all staff involved in the sale of alcohol shall be trained in the prevention of sales of alcohol to underage persons, and the challenge 25 scheme in operation at the stall. A record of such training shall be kept / be accessible at the stall at all times and be made immediately available for inspection at the stall to council or police officers on request. The training record shall include the trainee's name (in block capitals), the trainer's name (in block capitals), the signature of the trainee, the signature of the trainer, the date(s) of training and a declaration that the training has been received.
- That clearly legible signs shall be prominently displayed where they can easily be seen and read by customers stating to the effect that a challenge 25 policy is in operation at the premises, that customers may be asked to provide proof of age and stating what the acceptable forms of proof of age are. Such signage shall be displayed at all entrances, points of sale and in all areas where alcohol is displayed for sale. The signage shall be kept free from obstructions at all times.
- That a register of refused sales of alcohol shall be maintained in order to demonstrate effective operation of the challenge 25 policy. The register shall be clearly and legibly marked on the front cover as a register of refused sales, with the address of the premises and with the name and address of the licence holder. The register shall be kept / be accessible at the premises at all times. The register shall be made immediately available for inspection at the premises to council or police officers on request.

If the business needs refusals registers and training materials this authority is more than happy to provide them.

Ray MOORE

Principal Trading Standards Enforcement Officer

Southwark Council | Environment & Leisure | Regulatory Services

Post: 3rd Floor Hub 2, PO Box 64529 | London SE1P 5LX

Direct line 020 7525 0816 | Fax 020 7525 5735 | Call Centre 020 7525 2000

From: Robert [REDACTED]
Sent: Tuesday, June 11, 2019 12:01 AM
To: Moore, Ray; Regen, Licensing; Alcohol@homeoffice.gsi.gov.uk; Qau Safeguarding; Costin, Holly; DIP Team; 'FireSafetyRegulationSE@london-fire.gov.uk'; 'Graham White'; Highwayslicensing; Planning.Enquiries; Public Health Licensing; Reg Env Protection; Reg Health and Safety; southwark.repro@pbms.co.uk; Taylor, Dan; Tear, Jayne; West Team diary
Subject: RE: Application for a premises license for Spedie Shack, External Trading Area, Outside Surrey Quays Shopping Centre - application reference 868113

Dear Ray,

Licence number: 868113 - Spiedie Shack, Surrey Quays Shopping Centre

Thank you for your email dated 20 May, 2019.

Before I respond to the matters you have raised I wish to clarify why the operating schedule lacks a detailed description. I took into consideration guidance provide on the Government website Gov.uk, and in particular Section "**M: steps to promote the licensing objectives**". I kept a copy of this page at the time I was preparing my application, which I have attached for your convenience.

My understanding at the time, based on my reading of this note, was that as we will of course abide by all relevant legislation and will adopt best practice it was not necessary to for me to add a great deal of detail in this section of my application, but it has transpired that I was mistaken. I could argue therefore that this Government guidance note is too casual and misleading.

Having read other representations made in response to my application, I now understand why I was initially surprised and taken aback by your approach. You may have valid concerns you wish to raise, but the manner in which you have raised them seems unnecessary and is not how I would have expected a professional Principal Trading Standards Enforcement Officer to communicate with other authorities and a local business. I could also argue that you have been misleading when you state that "there is only the following references wrt the methods of preventing minors from obtaining alcohol", which you quoted (M.e.), when you know there is another reference, which you did not quote (M.a.).

I wish to record the fact that I object to your implication that I represent a risk to children, which is blatantly untrue. I have no idea how or why you have reached that extraordinary conclusion. You, commenting as the Principal Trading Standards Enforcement Officer for Southwark Council on my licence application, should already know that I am a responsible applicant and a Designated Premises Supervisor who has been operating The yellow house, an independent restaurant in Surrey Quays SE16, for nearly 16 years, that The yellow house is a family friendly restaurant with many local and loyal customers and that as the owner of this small independent company I would not do or permit anything to be done that could damage our established and hard-earned reputation at The yellow house, or the reputation of and prospects for our new venture in Surrey Quays, London SE16.

When completing my application I also took into consideration the Premises Licence granted by Southwark Council to Pizza 1889 (No: 859228) who also operate from a converted shipping container and who are also located near the entrance to Surrey Quays Shopping Centre. As this licence is an obvious precedent, I have "copied and pasted" below the sections that refer to the safe-guarding of children at the premises:

348 - That a written policy for the safe-guarding of children at the premises shall be devised. A copy of the policy shall be kept at the premises at all times that the premises are in operation and shall be made available to police or council officers on request.

488 - (1) The premises licence holder or club premises certificate holder must ensure that an age verification policy is adopted in respect of the premises in relation to the sale or supply of alcohol. (2) The designated premises supervisor in relation to the premises licence must ensure that the supply of alcohol at the premises is carried on in accordance with the age verification policy. (3) The policy must require individuals who appear to the responsible person to be under 18 years of age (or such older age as may be specified in the policy) to produce on request, before being served alcohol, identification bearing their photograph, date of birth and either (a) a holographic mark; or (b) an ultraviolet feature.

4AB - That all staff involved in the sale of alcohol shall be trained in the prevention of sales of alcohol to underage persons and the age verification scheme in operation at the premises. A record of such training shall be kept / be accessible at the premises at all times and be made immediately available for inspection at the premises to council and / or police officers on request.

4AC - That clearly legible signage shall be prominently displayed where it can easily be seen and read by customers stating to the effect that alcohol can only be sold to persons aged 18 years old and over, and that identification may be requested in regards to alcohol sales.

4AG - That an age verification scheme shall be implemented at the premises requiring that staff selling alcohol request that any customer who looks under 18 years old, and who is attempting to purchase alcohol, provides valid photographic identification proving that the customer is at least 18 years old. Valid photographic identification is composed of a driving licence, passport, UK armed services ID card, any Proof of Age Standards Scheme (PASS) accredited card or any card approved by the Secretary of State.

Some of these paragraphs appear to be repetitive. Please let me know if I have missed anything relation to the safe-guarding of children in Licence No: 859228.

I am confident Pizza 1889 also have no intention of selling alcohol to children. I refer to their licence only because our premises and location are identical and because their age verification scheme is acceptable whereas the same age verification scheme proposed in my application is apparently not acceptable.

Why do you think it is necessary to impose a “more robust system to ensure that alcohol is not sold to children” at Spiedie Shack than the system at Pizza 1889?

With reference to your concern about the lack of a more detail description of how sales of alcohol to minors can be prevented, I respond as follows:

- Spiedie Shack is a small business operating from a converted 20' x 8' shipping container with limited storage
- The principal business of Spiedie Shack is the sale of food made to order for consumption on our outside area or for take-away
- The sale of alcohol is expected to be a small part of our business (unlike for example sales of alcohol at Tesco nearby)
- We will adopt an age verification policy that complies with the mandatory condition which is appropriate for the scale of this operation
- We will adopt an age verification policy that is consistent with the age verification policy of our neighboring trading partner (Pizza 1889)

- We will maintain an incident log to record refusals to sell alcohol
- We will ensure there will always be at least two people working at Spiedie Shack during open hours
- We will ensure that there will always be one personal licence holder working and if a personal licence holder is absent we will not permit the sale of alcohol for the duration of that absence
- We will ensure that staff involved in the sale of alcohol are trained in the prevention of sales of alcohol to underage persons and the age verification scheme in operation at the premises.
- We will keep a record of such training at the premises which will be available for inspection at the premises to council and / or police officers on request
- We will install internal CCTV cameras
- We intend to install the CCTV server off-site for better security at The yellow house, located adjacent to the Surrey Quays Shopping Centre, where we can make recordings available for inspection

These are the details I omitted in the application but which I will ensure obviously be applying as a responsible owner of a licensed business.

I can assure you I have no wish or intention to permit Spiedie Shack staff to sell alcohol to anyone under the age of 18 years.

Regards,
Robert Wennberg

[REDACTED]
[REDACTED]

M: steps to promote the licensing objectives

You are asked to describe the steps you intend to take to promote the 4 licensing objectives:

- the prevention of crime and disorder
- public safety
- the prevention of public nuisance
- the protection of children from harm

Don't forget that you should already be abiding by relevant legislation in other areas. Your starting point should be compliance with these requirements. If you feel there is nothing more you need to do, then you might wish to write 'N/A' or something like 'nothing beyond existing health and safety/fire safety etc requirements'. This shows you have considered the objectives and come to a decision that you have nothing additional to do and not that you have forgotten to write anything in this section. Of course, if a responsible authority for one of the licensing objectives considers that you need to do more, they will be able to make representations. If you have concerns, you may find it useful to talk to the relevant responsible authority before completing the form. Further information on responsible authorities is available from the [Home Office website](#) or from your local authority licensing officer or website.

If you do intend to take additional measures, you should consider carefully what to include. Anything you put down here is likely to become a condition of your licence. Failure to meet those conditions would constitute an offence under the act. You should therefore think carefully about adding conditions to ensure that they are achievable, realistic, appropriate, proportionate and within your control. Base your response on a proper, common sense consideration of the risks and what you can realistically do to mitigate them. In the 'general box', list the steps you will take to promote all 4 licensing objectives together, for example, employing additional staff.

MEMO: Licensing Unit

To	Licensing Unit	Date	5 June 2019	
Copies				
From	Jayne Tear	Telephone	020 7525 0396	Fax
Email	jayne.tear@southwark.gov.uk			

Subject Re: Spiedie Shack, External Trading Area, Surrey Quays Shopping Centre, Redriff
Road, London SE16 7LL – Application for a premises licence

I write with regards to the above application for a premises licence submitted by Robert Wennberg under the Licensing Act 2003, which seeks the following licensable activities:

- Supply of Alcohol (on and off the premises) on Monday to Sunday from 07:30 to 23:00
- The proposed opening hours will be on Monday to Sunday from 07:30 to 23:00

The premises is described as '*A shipping container converted into a kiosk for operating as a new street food concept located outside the Surrey Quays Shopping Centre. Outdoor seating in front of the container but no indoor seating for customers*'.

This premise is situated within Canada Water Major Town Centre Area.

My representation is based on the Southwark Statement of Licensing policy 2016 – 2020 and relates to the licensing objectives for the prevention of crime and disorder and the prevention of public nuisance.

The operating schedule is sparse and does not adequately address the licensing objectives.

Further to this there has there has not been any time left between the last sale of alcohol 'on sales' and the closing time when patrons should have left the premises, this can lead to conflict between staff and the customer having purchased an alcoholic drink for consumption on the premises minutes before closing time and being asked to either finish the drink or hand it back and to leave the premises. Additionally this will encourage patrons to rush consumption of alcoholic drinks at the same time of closing which can lead to antisocial behaviour problems when patron have left the premises.

I ask the applicant to amend the finish time for alcohol '*on sales*' as follows:

- Sale of alcohol on the premises shall cease at 22:30 daily

This will allow for half an hour drinking up time.

Due to the limited information on the application form and to further promote the licensing objectives I ask the applicant to provide the following information and to consider adding the following conditions to the operating schedule:

- Provide an accomodation limit for the outside area of the premises as defined on the plans (to be conditioned), and to further explain how this area will be controlled to prevent patrons drinking in the street or the carpark area of the shopping centre.
- To provide a written dispersal policy for the premises. (to be conditioned)

To add further conditions:

- Any '*off sales*' of alcohol shall be provided in sealed containers and taken away from the premises save for the outside area as defined on the premises plans.
- That clear legible signage shall be prominently displayed where it can be easily seen and read, requesting that alcohol sold as '*off sales*' should not be opened and consumed in the vicinity of the premises except for the premises outside seating area.

I reserve the right to comment further once all of the information is received and welcome any discussion with the applicant regarding conciliation of this representation.

Southwark's Statement of Licensing Policy 2016 – 2020 can be found on the following link:

Jayne Tear
Principal Licensing officer
In the capacity of the Licensing Responsible Authority

From: Robert [REDACTED]
Sent: Monday, June 10, 2019 6:21 PM
To: Tear, Jayne; Earis, Richard
Cc: McArthur, Wesley; Regen, Licensing
Subject: RE: REPRESENTATION RE SPIEDIE SHACK

Dear Jayne and Richard,

Licence number: 868113 - Spiedie Shack, Surrey Quays Shopping Centre

Thank you for your email and representation dated 5 June, 2019 and your email dated 10 June, 2019.

I have taken on board the comments you have made and, as you have both raised similar concerns about prevention of crime and disorder and prevention of public nuisance, I hope it is acceptable for me to respond to you both with this email.

Before I respond to each of the matters you have raised I wish to clarify why the operating schedule appears to be, as you've stated, sparse. I took into consideration guidance provide on the Government website Gov.uk, and in particular Section "**M: steps to promote the licensing objectives**". I kept a copy of this page at the time I was preparing my application, which I have attached for your convenience.

My understanding at the time, based on my reading of this note, was that as we will of course abide by all relevant legislation and will adopt best practice (N.B. I am a practicing DPS and have been operating The yellow house in Surrey Quays for nearly 16 years) it was not necessary to for me to add a great deal of detail in this section of my application, but it has transpired that I was mistaken. I could argue therefore that this Government guidance note is too casual and misleading.

With reference to the matters you have raised, I respond as follows:

- **I wish to amend the finish time for the sale of alcohol to be consumed both on and off the premises to 22:30 daily**
- **I wish to add an accommodation limit of 40 people for the outside seating area as defined on the premises plan**
- **I wish to add that sales of alcohol to be consumed both on and off the premises will only be made to customers who also purchase food**
- **I wish to add that sales alcohol to be consume off the premises will be in sealed containers to be taken away from the premises save for the outside area as defined on the premises plan**

We will ask customer to remain within our outside area as defined on the premises plan (the "Green Area" as designated by green astro-turf laid on the ground) when they purchase an alcoholic drink to consume with a meal on the premises. Staff will be instructed to remind customers to move back into the Green Area if they stray outside this area. We will not allow a customer who persists in going beyond the Green Area to make another purchase of alcohol for consumption on the premises.

I am familiar with Pizza 1889 (Licence Number: 859228), who are operating in a shipping container located adjacent to Spiedie Shack, and I have not witnessed customers wandering off with open alcoholic drinks and drinking in the adjacent car park so I believe this risk is not great and is manageable. Please note that there are CCTV cameras covering the outdoor areas of Surrey Quays

Shopping Centre. I believe it is certainly a much lower risk than the nuisance and dis-order we witness from time to time outside our local Wetherspoon's. We will not be aiming to sell 'cheap booze' – our intention is to permit our customers (who we hope will become regulars, many of whom will already be customers of ours at The yellow house) to purchase for example a can of craft beer to enjoy with one of our spiedies, either while sitting on one of our benches or to take home with them for supper.

Site plan

Both the Spiedie Shack and Pizza 1889 containers are located outside and to the left of the main entrance to Surrey Quays Shopping Centre. I have attached a copy of the site plan provided to me by British land, our landlord. The Spiedie Shack container is marked in red on this copy, but please note that the final outside area (the Green Area referred to above) is wider than the container and on the right side of the container as shown on the premises plan attached to my application.

I submit my written response now in the hope that I have addressed your concerns in full as I am aware of the 11th June deadline, but I am happy to phone you to discuss any of the matters you have raised.

I can assure you that I am a responsible applicant and would not do or permit anything to be done that could damage our established reputation at The yellow house or the reputation of our new venture in Surrey Quays, London SE16.

Best regards,
Robert Wennberg.

████████████████████
████████████████████

From: Earis, Richard
Sent: Monday, June 10, 2019 10:39 AM
To: Regen, Licensing
Cc: [REDACTED]
Subject: New License Objection - Spiedie Shack Surrey Quays Shopping Centre

RE: New License Application - Spiedie Shack External Trading Area Surrey Quays Shopping Centre Redriff Road - food kiosk for operating as a new street food concept located outside the Surrey Quays Shopping Centre

I have considered the above and I would like to object under the prevention of public nuisance licensing objective. The reason for the objection is that the application does not contain sufficient information and controls to provide assurance that the licensing objective will be met.

In particular it is unclear exactly where the premises is located on the wider site as no location plan has been provided.

Please could the applicant provide a location plan and proposed accommodation limit for the marked external area?

I will then comment further to see whether it is possible to conciliate my objections.

Kind Regards,

Richard

Richard Earis
Principal Environmental Protection Officer
Environmental Protection Team

020 7525 2469

Postal address: Southwark Council | Environmental Protection Team | Regulatory Services | 3rd Floor Hub 1 | PO Box 64529 | London | SE1P 5LX.

Office address (By appointment only): Southwark Council | Environmental Protection Team | Regulatory Services | 3rd Floor Hub 1 | 160 Tooley Street | London | SE1 2QH

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visit: <http://www.southwark.gov.uk/air-quality>



Please consider the environment - do you really need to print this email?

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Sent: Monday, June 10, 2019 6:21 PM
To: Tear, Jayne; Earis, Richard
Cc: McArthur, Wesley; Regen, Licensing
Subject: RE: REPRESENTATION RE SPIEDIE SHACK

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I can assure you that I am a responsible applicant and would not do or permit anything to be done that could damage our established reputation at The yellow house or the reputation of our new venture in Surrey Quays, London SE16.

Best regards,
Robert Wennberg.

[REDACTED]
[REDACTED]

From: Earis, Richard
Sent: Tuesday, June 11, 2019 10:56 AM
To: Regen, Licensing
Cc: McArthur, Wesley; 'Robert'; Tear, Jayne
Subject: RE: REPRESENTATION RE SPIEDIE SHACK

Dear Licensing,

On the basis of the information provided and the newly offered conditions (highlighted in red below), I confirm that my concerns have been addressed and I withdraw my objections.

Kind Regards,

Richard

Richard Earis
Principal Environmental Protection Officer
Environmental Protection Team

020 7525 2469

Postal address: Southwark Council | Environmental Protection Team | Regulatory Services | 3rd Floor Hub 1 | PO Box 64529 | London | SE1P 5LX.

Office address (By appointment only): Southwark Council | Environmental Protection Team |
Regulatory Services | 3rd Floor Hub 1 | 160 Tooley Street | London | SE1 2QH

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Location Plan

Notes
 SQ-LDA-SA-00-05001
 SQ-LDA-EX-00-06001
 SQ-LDA-EX-00-07001
 SQ-LDA-EX-00-08001
 SQ-LDA-EX-00-09001
 SQ-LDA-EX-00-10001

Tenant Demolition Boundary

Rev. Date	Revision	By	Checked
P02 17.09.18	Unit Spacing Update	YX	AR
P01 16.08.18	General Update	YX	AR
P00 02.11.17	Initial Issue	LR	MS

leonard design architects
 4th floor, Abdon House
 5-13 Canal Street
 Nottingham, NG1 7EG, United Kingdom
 L +44 (0) 115 945 0080
 e. office@leonarddesignarchitects.com



Project
Existing Centre Refurbishment
 Surrey Quays Shopping Centre
 Canada Water

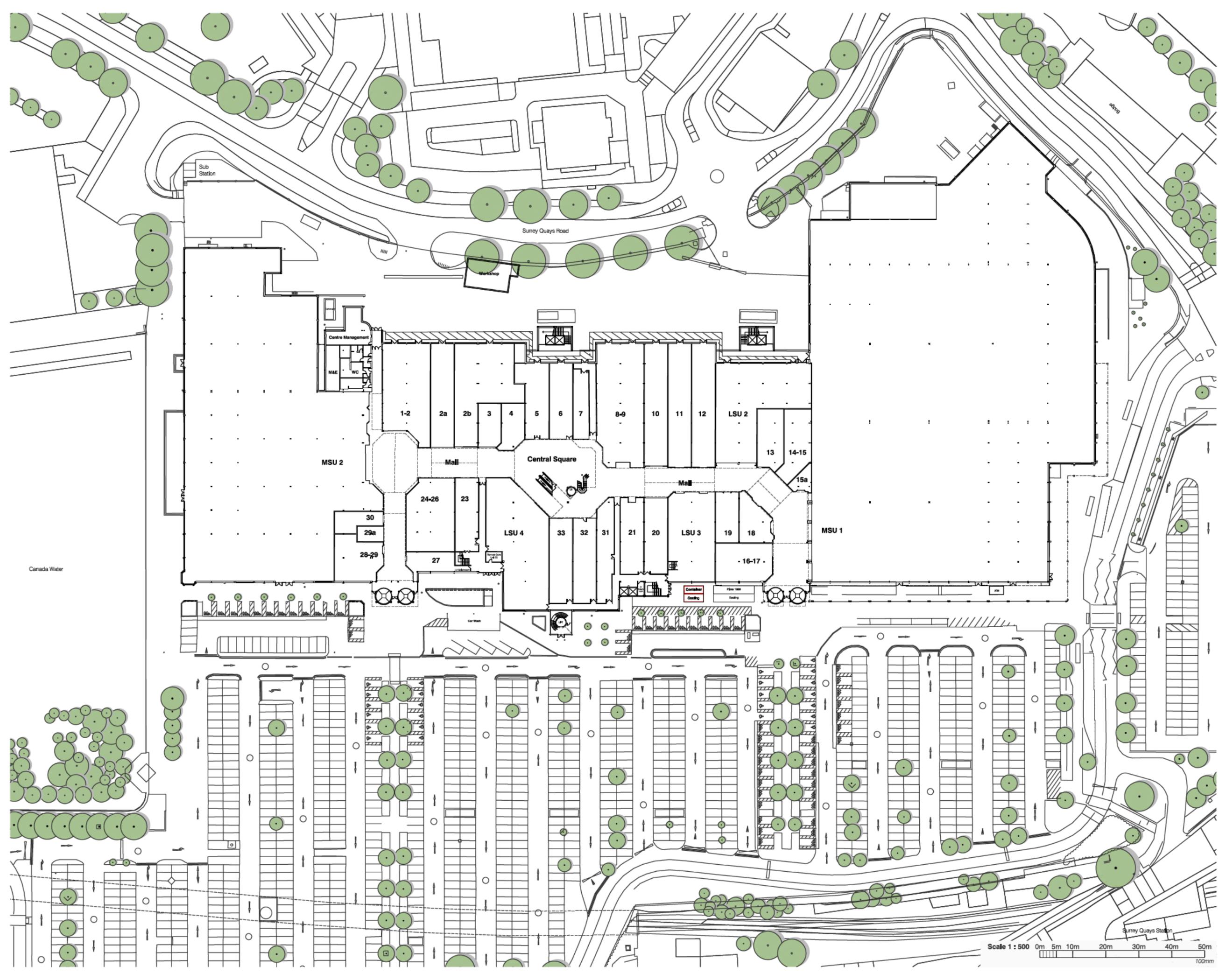
Drawing Title Project Number 0416

Lease Plan
 Ground Floor
 Container

Comp. File No.	Status
sq-lda-ex-00-06001	S0
Drawn by LR	Checked by MS
Scale @A1 1:500	Date 02.11.17
File Identifier SQ-LDA-EX-00-DR09191	Revision P02

Purpose of Issue **Leasing**

Workflow Status **PRELIMINARY**



From: Public Health Licensing
Sent: Monday, June 10, 2019 12:51 PM
To: Regen, Licensing
Cc: Deidda, Clizia; Shapo, Leidon
Subject: RE: Spiedie Shack, External Trading Area, Surrey Quays Shopping Centre, Redriff Road, London, SE16 7LL

To Whom it may concern:

RE: Spiedie Shack, External Trading Area, Surrey Quays Shopping Centre, Redriff Road, London, SE16 7LL

On behalf of the Director of Place and Wellbeing (incorporating the role of Director of Public Health) for Southwark (a responsible authority under the Licensing Act 2003) I wish to make a representation in respect of the above.

This representation is made in respect of the following licensing objective:

- Public nuisance
- Prevention of crime and disorder
- Protection of children from harm

General Comments

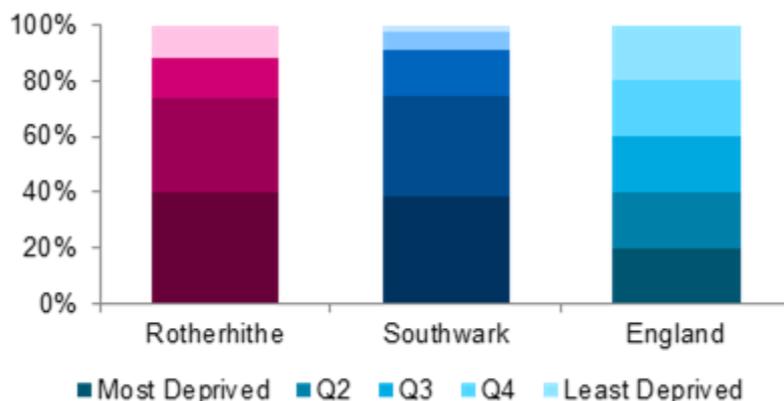
The applicant requests a new application for the sale of alcohol on and off the premises.

Requested hours of operation	Opening Hours	Sale of alcohol off the premises	Sale of alcohol on the premises
Monday to Sunday	07:30 – 23:00	07:30 – 23:00	07:30 – 23:00

Concerns relating to this application

The premises is located in the Rotherhithe ward, which is a ward with high levels of deprivation. Figure 1 shows that 40% of residents are in the most deprived quintile and 34% are in the 2nd most deprived quintile. This is relevant because the evidence shows that deprived populations are disproportionately affected by alcohol related harm.

Figure 1. Proportion of population in each deprivation quintile



Furthermore, Rotherhithe is responsible for 4% of all alcohol related ambulance call-outs in Southwark (131 in 2017 alone). This thus shows that alcohol-fuelled activities are having a negative impact on the ward.

I also have concerns regarding the hours of alcohol sales requested and I would suggest a later start time for alcohol sales: early-morning alcohol purchasers are more likely to be alcohol misusers and may thereby contribute to antisocial behaviour such as street drinking. In fact, early morning drinking is considered one of the indicators for alcohol misuse (this is regularly screened for in the AUDIT, CAGE and T-ACE Alcohol misuse screening questionnaires).

Finally, the operating schedule provided by the Applicant is very vague, and I am not satisfied the proposed conditions will promote the four licensing objectives. For example, I would like to see a rather more detailed description on how the Applicant will prevent the sale of alcohol to minors, for example by adopting the industry standard Challenge 25 scheme. I would also like to know more about the nature of the business: is this going to be a restaurant, or mostly a café/takeaway?

Recommendations

Taking in to account all of the above, I recommend the operating hours be amended to:

Requested hours of operation	Opening Hours	Sale of alcohol off the premises	Sale of alcohol on the premises
Monday to Sunday	07:30 – 23:00	11:00 – 23:00	11:00 – 22:30

Also, I recommend that no beers, lagers, ciders or similar alcohols to be sold in cans with an Alcohol By Volume (ABV) in excess of 6.5% or in bottles larger than 750ml with an ABV in excess of 6.5% and that any off sales of alcohol shall be provided in sealed containers and taken away from the premises.

If you have any further questions, please do not hesitate to contact me.

Yours sincerely,

Clizia Deidda

on behalf of Professor Kevin Fenton, Director of Place and Wellbeing (incorporating the role of Director of Public Health)

Clizia Deidda

Public Health Policy Officer (Mental Health, Substance Misuse & Healthcare) | Public Health Division

Place and Wellbeing Department | London Borough of Southwark

160 Tooley Street | London SE1P 5LX

T: 0207 525 7707 | M: 07710 179 570

E: Clizia.deidda@southwark.gov.uk

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Tel: 020 7232 6756

Email: SouthwarkLicensing@met.police.uk

Our reference: **MD/21/085/19**

Date: **11/06/2019**

Dear Sir/Madam

Re:- Spiedie Shack Surrey Quays Shopping Centre Redriffe Road SE16 7LL

Police are in possession of an application from the above for a new premises licence. The general description of the premises is a Shipping container operating as a new food concept with indoor and outdoor seating.

The proposed opening hours and provision for the supply of alcohol are 07:30 to 23:00 Monday to Sunday.

Unfortunately the applicant has failed to address any of the four licensing objectives with sufficient detail within the operating schedule.

With reference to the prevention of crime and disorder the applicant has offered *the presence of staff during opening hours and that the container is locked when closed.*

One would expect that this would be more common sense than a precise and enforceable control measure as per home office guidance.

Home office guidance issued under Sec 182 of the licensing Act 2003 'General principles' state that it is important in setting the parameters within which the premises may operate. Conditions must be precise and enforceable.

I am unable to comment further on this application due to the lack of information contained within. It is for this reason that I object to this application on the basis that the applicant has failed to address the promotion of the prevention of crime and disorder.

Yours Sincerely

PC Ian Clements
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