

**From:** Moore, Ray

**Sent:** Monday, June 03, 2019 1:32 PM

**To:** [REDACTED]; Regen, Licensing; Tear, Jayne; [Alcohol@homeoffice.gsi.gov.uk](mailto:Alcohol@homeoffice.gsi.gov.uk); Qau Safeguarding; Costin, Holly; DIP Team; FireSafetyRegulationSE@london-fire.gov.uk ([FSR-AdminSupport@london-fire.gov.uk](mailto: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](mailto:southwark.repro@pbms.co.uk); Taylor, Dan; Tear, Jayne; West Team diary

**Subject:** FW: Application for a major variation to a premises license for "Diggy Nelson of Treadgold Ltd", 56 Peckham High Street, Peckham, London, SE15 5DB - application reference 868339 / 1231838

As a responsible authority under the Licensing Act 2003, Trading Standards are in receipt of an application from "[REDACTED] Treadgold Ltd" for a major variation to the premises license for 56 Peckham High Street This premises is in the Peckham Cumulative Impact Zone area. It should be noted that the main intention of the variation is to extend the hours of operation of the premises and remove certain conditions as follows:-

*"1. To change the layout of the premises as per the plan provided in this application. To amend condition 307 to allow an 'accommodation limit' of 229 persons. To amend condition 844 to reflect the proposed change of the accommodation limit. To remove conditions 122, 345, 847 and 848 from the licence. Add condition 901.*

*2. To extend our opening hours to 04:00 on Wednesday and Thursday.*

*3. To extend our opening hours to 05:00 on Friday and Saturday.*

*4. On Wednesday and Thursday, we would like to extend the terminal hour in respect of Entertainment similar to live/recorded music - indoors*

*Live music - indoors*

*Performance of dance - indoors*

*Recorded music - indoors*

*to 03:30*

*4. On Friday and Saturday we would like to extend the terminal hour in respect of Entertainment similar to live/recorded music - indoors*

*Live music - indoors*

*Performance of dance - indoors*

*Recorded music - indoors*

*to 05:00*

*5. On Sunday we would like to extend the terminal hour in respect of Entertainment similar to live/recorded music - indoors*

*Live music - indoors*

*Performance of dance - indoors*

*Recorded music - indoors*

*to 04:00*

*6. To extend the hours permitted for the sale of alcohol until the following times*

*Friday 04:30*

*Saturday 04:30*

*Sunday 03:30"*

There is a section in the operating schedule that seeks to state how what they intend to mitigate the impact of extending the hours. It is not very convincing.

In the licensing objectives there is no real reference to procedures for the protection of children from harm, other than the mandatory condition requiring an age verification policy. Trading Standards would make 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 and that the industry standard Challenge 25 is adopted.

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.
- No unaccompanied children under the age of 16 will be permitted any time. No children under 18 after 20:00 hours.
- No gambling machines will be on the premises.

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

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**From:** [REDACTED]  
**Sent:** Tuesday, June 18, 2019 2:43 PM  
**To:** Moore, Ray  
**Cc:** McArthur, Wesley  
**Subject:** Re: FW: Application for a major variation to a premises licence for "Diggy Nelson of Treadgold Ltd", 56 Peckham High Street, Peckham, London, SE15 5DB - application reference 868339 / 1231838

Dear Ray,

Thank you for your comments which are very much appreciated, however, we are a little confused by your representation.

Please note that this is not an application for a new premises licence, or an application to review our existing premises licence. It is an application to vary an existing premises licence with the intended effect of changing the layout of the premises and extending the hours of operation of the premises.

You mention that the steps taken to mitigate the impact of extending our operating hours are 'not very convincing', but provide no further comment. In the application, we provided explanations as to why we require the extended hours of operation and also significant additional comments pertaining to cumulative impact in attached additional sheets. (However, please note that we have amended our additional comments as we realise that we attached a rough draft of the comments and that the rough draft contained some typos and errors. The final draft is attached to this email).

Paragraph 84 of Southwark Council's Statement of Licensing Policy states that:

*"A representation will only be "relevant" if it relates to the likely effect of the grant of the licence on the promotion of at least one of the licensing objectives. A representation that fails to do this is not "relevant" for the purposes of the 2003 Act. It is for the licensing authority to determine on its merits whether any representation by an interested party is frivolous or vexatious."*

We are not sure how your requested conditions can be deemed relevant as we are not new premises, we can already operate without having to adhere to such conditions and you do not state why extending our operating hours (or changing the layout of the premises) would necessitate the requirement of these new conditions. We have already been operating compliantly and successfully in the late night time economy without the requirement for these conditions and see no reason why this would not continue to be the case should we be granted extended hours or be permitted to change the layout of the premises.

We also add that we are not requesting a significant extension of our overall closing times – as is explained in the application.

There has been no indication that we have ever operated to the detriment of the prevention of children from harm licensing objective, and if this was the case then a review application would be the suitable route to impose conditions relating to the protection of children from harm licensing objective, not this variation application. We would also point out that the variation application process shouldn't be used as a chance for a responsible authority to have 'two bites of the cherry'. It was when the premises licence was applied for (and indeed when prior review and minor variation applications, relevant to the prior management of the premises, were submitted) that such conditions could have been imposed on the licence - if required.

In regards to the proposed challenge 25 policy you state that it is 'industry standard'. This is incorrect. We operate as a bar / entertainment venue and it is certainly not industry standard to operate a challenge 25 policy. We note that Challenge 25 may be industry standard in the off sales market relating to supermarkets, grocers, off licences and the like, but it certainly isn't 'industry standard' in the pub, bar or club industry. The following licensed premises which all fall into the pub, bar or club categories, and which are the closest premises of these types to us, don't have challenge 25 conditions on their licences: Copper Tap (190 Peckham High Street), The Greyhound (109 Peckham





56 Peckham High Street, London, SE15 5DP  
[REDACTED]

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**From:** Moore, Ray  
**Sent:** Tuesday, June 18, 2019 3:15 PM  
**To:** [REDACTED]  
**Cc:** 'Graham.S.White@met.police.uk'; McArthur, Wesley  
**Subject:** RE: FW: Application for a major variation to a premises license for "Diggy Nelson of Treadgold Ltd", 56 Peckham High Street, Peckham, London, SE15 5DB - application reference 868339 / 1231838

Thanks for your response... I assume from what you have said that you do not intend to accept the proposed conditions and have not suggested any form of conciliation. So it would seem that the matter will need to go to the sub committee.

Yours etc.

Ray MOORE  
Principal Trading Standards Enforcement Officer  
Southwark Council | Environment & Leisure| Regulatory Services  
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**From:** McArthur, Wesley  
**Sent:** Tuesday, June 18, 2019 5:09 PM  
**To:** Moore, Ray; [REDACTED]  
**Subject:** RE: FW: Application for a major variation to a premises license for "Diggy Nelson of Treadgold Ltd", 56 Peckham High Street, Peckham, London, SE15 5DB - application reference 868339 / 1231838

Dear Both,

Having discussed this matter with my Team Leader and Ray please note the following:

Part of the application is to remove condition 122 from the existing premises licence. Ray's original representation didn't specifically refer to the removal of condition 122 from the existing premises licence which may have caused some confusion. Condition 122 states:

*"122 - No person under fourteen shall be in the bar of the licensed premises during the permitted hours unless one of the following applies*

*a. He is the child of the holder of the premises licence*



Contrary to your response we do wish to conciliate, and provided you with a reply with an explanation of our reasoning (prior to having received further explanation from Wesley regarding condition 122) and also proposed two conditions.

We still wish to remove condition 122. We note that condition 122 explicitly relates to the prohibition of children under 14 years old from the premises and nothing else. Whilst we believe that the two conditions we proposed previously mitigate the removal of condition 122, we also now propose the following robust conditions which further address the protection of children from harm licensing objective.

- That an age verification scheme shall be maintained 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 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. Any training provided shall include the latest version of any Southwark Council prevention of underage sales training pack. 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 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. Full copies of the training provided (whether physical or electronic) will 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.
- That clearly legible signs shall be prominently displayed where they can easily be seen and read by customers stating to the effect that no sales of alcohol can be made to persons under 18 years old and that valid photo identification may be required. 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 age verification 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 and / or police officers on request. If Southwark Council provides a refusal register in a preferred format, we shall use refusal register provided by Southwark Council.
- That no unaccompanied children under the age of 16 will be permitted at any time. Any children under 16 must be accompanied on the premises at all times by a parent, guardian or other responsible adult.
- That no children under the age of 18 shall be permitted on the premises after 23:00 hours.

Thus we are proposing 6 more useful conditions to replace 1 condition that was transferred from now defunct legislation. We believe that the above conditions are far more robust than the condition (122) that they are replacing, are easily enforceable and show a commitment to the prevention of underage sales without being unduly onerous or putting us at a disadvantage to other local premises.

We welcome your further comments, but hope that you are able to accept the conditions proposed above as acceptable.

Kind regards

██████████

**From:** Moore, Ray  
**Sent:** Thursday, June 20, 2019 8:52 AM  
**To:** McArthur, Wesley; Tear, Jayne; SSCP; 'SouthwarkLicensing@met.pnn.police.uk'; 'Ian.Clements@met.pnn.police.uk'; 'Graham.S.White@met.pnn.police.uk'; 'mark.A.Lynch@met.pnn.police.uk'; 'firesafetyregulationSE@london-fire.gov.uk'; Planning.Enquiries; Regen, OHS; Public Health Licensing; Shapo, Leidon; Deidda, Clizia; 'alcohol@homeoffice.gsi.gov.uk'; 'Dominic.Maragh2@homeoffice.gsi.gov.uk'; Fox, Roy; Earis, Richard; Binya, Raymond; Andrews, Ken  
**Subject:** RE: Premises licence variation: Tola, 56 Peckham High Street, London, SE15 5DP (our ref: L1U 868339)

Unfortunately the applicant does not appear to know what an age verification scheme is... which makes me question his competence to effectively manage the place.

Ray MOORE

Principal Trading Standards Enforcement Officer

Southwark Council | Environment & Leisure| Regulatory Services

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---

**From:** Moore, Ray

**Sent:** Thursday, June 20, 2019 11:45 AM

**To:** [REDACTED] McArthur, Wesley

**Cc:** 'Graham.S.White@met.police.uk'; Ian.Clements@met.police.uk; Deidda, Clizia; Tear, Jayne; Regen, Licensing

**Subject:** RE: FW: Application for a major variation to a premises license for "Diggy Nelson of Treadgold Ltd", 56 Peckham High Street, Peckham, London, SE15 5DB - application reference 868339 / 1231838

Dear Sir,

Many thanks for your swift response and proposed conciliation. However, I still have some issues with these matters... firstly you propose a condition wrt "age verification" where you will require staff to ask for ID if they believe that the person looks under 18. That is not an age verification scheme and I would strongly urge you to take another look at any licensing training that you have undertaken to ensure that you understand what an age verification scheme is. I find this deeply concerning that the responsible person does not appear to have an understanding of some of the essential principles of licensing law and this does not give confidence in the future running of the business. I have already given you a condition, word for word, that would cover the issue of age verification and you have sent back a counter proposal that is not an "age verification scheme".

Given the above I fear that any training given to staff on these matters would be fundamentally flawed.

Given that the application also proposes an extension of hours in the Peckham CIZ without specifying how this would be mitigated I now feel that these matters are best resolved at the licensing sub committee.

Yours

Ray MOORE

Principal Trading Standards Enforcement Officer

Southwark Council | Environment & Leisure| Regulatory Services

On Thu, Jul 25, 2019 at 7:13 AM Moore, Ray <[Ray.Moore@southwark.gov.uk](mailto:Ray.Moore@southwark.gov.uk)> wrote:

Morning Diggy,

See your e-mail below with the points discussed... just needs confirmation of the change of the "18" to "25" in the age verification condition.

Thanks

Ray MOORE

Principal Trading Standards Enforcement Officer

Southwark Council | Environment & Leisure| Regulatory Services

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**From:** Diggy Nelson [REDACTED]

**Sent:** Thursday, July 25, 2019 1:57 PM

**To:** Moore, Ray

**Cc:** Tom Broadbent; Fred Cassavetti; James Daghish; McArthur, Wesley

**Subject:** Re: FW: FW: Application for a major variation to a premises license for "Diggy Nelson of Treadgold Ltd", 56 Peckham High Street, Peckham, London, SE15 5DB - application reference 868339 / 1231838

Hi Ray,

Please see the amended conditions confirming we are happy to change "18" to "25" and we are happy to include the "Challenge 25 scheme" in it's entirety.

We still wish to remove condition 122. We note that condition 122 explicitly relates to the prohibition of children under 14 years old from the premises and nothing else. Whilst we believe that the two conditions we proposed previously mitigate the removal of condition 122, we also now propose the following robust conditions which further address the protection of children from harm licensing objective.

- That an age verification scheme shall be maintained at the premises 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 25 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. Any training provided shall include the latest version of any Southwark Council prevention of underage sales training pack. 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 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. Full copies of the training provided (whether physical or electronic) will 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.
- That clearly legible signs shall be prominently displayed where they can easily be seen and read by customers stating to the effect that no sales of alcohol can be made to persons under 18 years old and that valid photo identification may be required. 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 age verification 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 and / or police officers on request. If Southwark Council provides a refusal register in a preferred format, we shall use refusal register provided by Southwark Council.
- That no unaccompanied children under the age of 16 will be permitted at any time. Any children under 16 must be accompanied on the premises at all times by a parent, guardian or other responsible adult.
- That no children under the age of 18 shall be permitted on the premises after 23:00 hours.

Kind regards

[REDACTED]

[REDACTED]  
Managing Director

[REDACTED]

Treadgold Ltd

[REDACTED]  
[REDACTED]

[REDACTED]



56 Peckham High Street, London, SE15 5DP

[REDACTED]

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**From:** Moore, Ray

**Sent:** Thursday, July 25, 2019 2:13 PM

**To:** [REDACTED]; Regen, Licensing; 'Graham.S.White@met.police.uk'; 'Ian.Clements@met.police.uk'

**Cc:** Tom Broadbent; Fred Cassavetti; James Daghish; McArthur, Wesley

**Subject:** RE: FW: FW: Application for a major variation to a premises license for "Diggy Nelson of Treadgold Ltd", 56 Peckham High Street, Peckham, London, SE15 5DB - application reference 868339 / 1231838

On the basis of the proposed conditions below, Trading Standards now withdraw their representations.

Ray MOORE

# MEMO: Licensing Unit

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To Licensing Department Date 26<sup>th</sup> June 2019

Copies

From Farhad Chowdhury Telephc 020 7525 0398 Fax

Email Farhad.chowdhury@southwark.gov.uk

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Subject: [REDACTED] Treadegold Limited, T/A Tola 56 Peckham High Street SE15 5DP

I write in reference to the application submitted by Diggy Nelson of Treadgold Limited, for a variation to their premises Licence and I would make the following comments.

I have read the application and note the applicant has not properly addressed any of the licensing objectives in the new Licensing Policy 2016. I would like some clarifications on some points, and have made some recommendations where appropriate:-

- 1) Explain how the applicant will deal with public safety, the applicant propose to increase the maximum accommodation limit to 229 persons, it is not clear what the applicant wants to increase the capacity to. The premises are not suitable to accommodate 229 persons.
- 2) A comprehensive site specific risk assessments to be done by a competent person and submitted to this Department.

I therefore **Object** to this variation application on grounds of **Public Safety** until the matters above have been addressed properly.

**Farhad Chowdhury**  
**Principal Enforcement Officer**

**From:** [REDACTED]  
**Sent:** Wednesday, July 10, 2019 5:48 PM  
**To:** Chowdhury, Farhad  
**Cc:** [REDACTED] McArthur, Wesley  
**Subject:** Application to vary a premises licence - Tola, 56 Peckham High Street, London, SE15 4DP (application number 868339)

Good evening Farhad,

Thank you for your representation with regards to our licence application. My apologies, it appears that the supporting documents we provided were not forwarded to you along with our application. I have copied/addressed your points below, and hope that we can come to a resolution regarding your concerns:

***1) Explain how the applicant will deal with public safety, the applicant propose to increase the maximum accommodation limit to 229 persons, it is not clear what the applicant wants to increase the capacity to. The premises are not suitable to accommodate 229 persons.***

***2) A comprehensive site specific risk assessments to be done by a competent person and submitted to this Department.***

In response to your first point,

- I have attached our plan and calculations based on:

TECHNICAL STANDARDS FOR PLACES OF ENTERTAINMENT 2015 (REVISED 2019)

- The only fire escape on the current licence (permitting 100 people) is 820mm. Our request for an increase on our capacity to accommodate the guideline amount is contingent with the addition of a main fire escape measuring 1050mm and opening out on to the main road (access point for emergency services). We have been advised by our risk assessment officer that combined with the 820mm escape, this would be more than sufficient. We are, however, happy to propose increasing the 820mm escape to 1050mm also, as an extra measure.

- The new layout means that we have increased overall floorspace.

- The new layout means that there is no longer a "bottleneck" around the dancefloor, and gangways have been greatly increased in width.

- The glass front means that all of our security have a view of what is happening inside the venue, even if situated at the front door.

- We have increased the CCTV from 4 analog cameras to 11 HD cameras.

- We employ twice as many security personnel as our licence requires on any given night.

- We have increased the number of fire extinguishers on hand.

- We have significantly upgraded our fire alarm system, based on the recommended requirement detailed in the risk assessment. Please see details below:

Panel conventional 4 zone (extra zones would be useful later) ESP Fireline. 4 zone

2 Smoke detectors bar and rear

1 heat (kitchen)

2 sounders on wall one near panel the other towards the side exit

1 sounders upstairs for kitchen

3 alarm call points one at each exit + 1 at the top of the stairs

1 Fire isolator Key switch for power to the panel

As for your second point, we have already had a risk assessment conducted on the site (hence the proposed changes), and are just waiting for the second to be written up and returned to us, I will forward as soon as it is.

If you also have your own risk assessment that has been conducted at any point, we would be very grateful if you could share it with us.

We eagerly await your response.

Kind regards

[REDACTED]

[REDACTED]  
Managing Director  
[REDACTED]

Treadgold Ltd  
[REDACTED]  
[REDACTED]

TOLA



56 Peckham High Street, London, SE15 5DP  
[REDACTED]

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**From:** Chowdhury, Farhad

**Sent:** Thursday, July 11, 2019 9:40 AM

**To:** [REDACTED]

**Cc:** [REDACTED] McArthur, Wesley

**Subject:** RE: Application to vary a premises licence - Tola, 56 Peckham High Street, London, SE15 4DP (application number 868339)

Dear [REDACTED],

Thank you for your email, I would like to do a site visit either today or tomorrow to see myself the new layout.

Please let me know when you are available.

Kind Regards

**Farhad Chowdhury**  
**Principal Enforcement Officer**

**From:** Chowdhury, Farhad  
**Sent:** Tuesday, July 16, 2019 10:41 AM  
**To:** Regen, Licensing  
**Cc:** McArthur, Wesley; Chudasama, Sailesh **Subject:** Tola,  
56 Peckham High Street SE15 5DP

Dear Licensing Team,

**Re: Withdrawal of Representation for: Tola, 56 Peckham High Street SE15 5DP**

I write to confirm that I have visited the premises yesterday and have carried out an inspection, I am now happy to withdraw my representation in respect of the premises licence application for Tola, 56 Peckham High Street SE15 5DP.

If you have any queries please do not hesitate to contact me.

Kind Regards

**Farhad Chowdhury**  
**Principal Enforcement Officer**

**Environment and Leisure**  
**Regulatory Services - Trading Standards and Environmental Health**  
**Health and Safety Team**  
**160 Tooley Street**  
**Third Floor – Hub 1B**  
**SE1 2QH**  
Tel: **020 7525 0398**  
Admin Tel: **020 7525 4261**  
Website: [www.southwark.gov.uk](http://www.southwark.gov.uk)  
E-mail: [farhad.chowdhury@southwark.gov.uk](mailto:farhad.chowdhury@southwark.gov.uk)

---

**From:** Chowdhury, Farhad  
**Sent:** Tuesday, July 16, 2019 4:52 PM  
**To:** McArthur, Wesley  
**Subject:** Fwd: FRA 56Peck Capacity

Hi Wesley

Please find fire risk assessment from Tola 56 Peckham High Street SE15.

They have calculated the maximum capacity as 200 persons and I'm happy with this.

Kind regards.

**Farhad Chowdhury**  
**Principal Enforcement Officer**

**Environment and Leisure**  
**Regulatory Services - Trading Standards and Environmental Health**  
**Health and Safety Team**  
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The Licensing Unit  
Floor 3  
160 Tooley Street  
London  
SE1 2QH

**Metropolitan Police Service**  
**Licensing Office**  
**Southwark Police Station,**  
**323 Borough High Street,**  
**LONDON,**  
**SE1 1JL**

Tel: 020 7232 6756

Email: SouthwarkLicensing@met.police.uk

**Our reference:** **MD21/094/19**

**Date:** **27<sup>th</sup> June 2019**

Dear Sir/Madam

**Re:- Tola, 56 Peckham High Street, London SE15 5DP**

Police are in possession of an application from the above for a variation to the premises licence. The premises is a nightclub located within the Peckham cumulative impact zone (CIZ) and its website describes it as a late night bar and music venue advertising DJ line-ups.

The application looks to vary the layout, increase the accommodation limit by an extra 129 people, and extend the opening hours to 04.00hrs Wednesday to Thursdays and 05.00hrs Friday and Saturday. Also to amend and remove conditions on the licence.

The application has set out this within the additional information number 1 - 5 and changes to hours. We object to the granting of the variation.

1. Condition 307 & 844 to increase from 100 to 229. We object to this as no extra measures have been offered to accommodate the increase and negate the impact within the CIZ.
2. Condition 345 to be removed. We object to this being removed as no other measures have been offered such as ID scanning system as recommended within the Southwark statement of licensing policy page 45.
3. Condition 848 to be removed. This was placed on the licence by the licensing subcommittee and should not be removed. Mr J.K's details can be obtained from the local authority and if an ID scanning system was in place entered onto that system banning him from entering.
4. Condition 122 to be removed. Police would require a condition to limit the age of children entering the premises to promote the protection of children from harm licensing objective as the premises is a night club aimed at an adult audience.
5. Condition 847 to be removed. No objection as long as CCTV covers the bar and serving area.

Change to Operating Hours.

Police object to the any extension to the opening hours as the licence is already in excess of what is recommended within the Southwark statement of licensing policy. Any increase would have an impact

on public nuisance, crime and disorder within the CIZ as longer hours increase the amount of alcohol consumed and this increases the likelihood of alcohol related violence.

The current licence allows for regulated entertainment until 23.00hrs Monday to Thursday and 03.00hrs Friday to Sunday. I have attached previous events advertised on the premises Facebook page held on a Thursday night showing a 03.00hrs finish with DJ's performing which is a clear breach of the licence. The premises website is currently advertising upcoming dates for Thursday nights for DJ lead events, which would also breach the current licence.

We object to any extension to regulated entertainment outside that recommended in the Southwark statement of licensing policy, as I believe it would add to the cumulative impact in the area.

Submitted for consideration

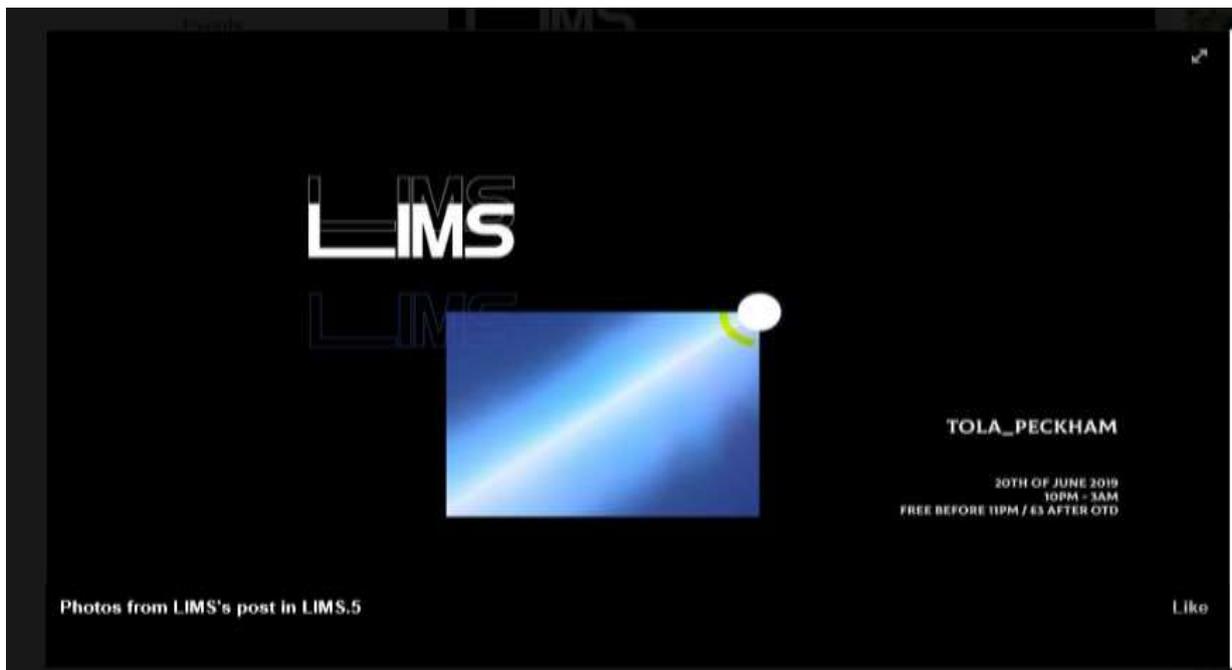
Yours Sincerely

**PC Graham White 2288AS**

Southwark Police Licensing Unit

Tel: 0207 232 6756

[Graham.S.White@met.pnn.police.uk](mailto:Graham.S.White@met.pnn.police.uk)





**JUN 13** BAILE LDN Launch w/ Morena Leraba  
Public · Hosted by Baile LDN and 3 others

★ Interested

🕒 Thursday, 13 June 2019 from 21:00-03:00 UTC+01  
about 1 week ago

📍 Tola Peckham  
56 Peckham High Street, Peckham, Se15 5DP London, United King... [Show map](#)

**60 went · 142 interested**

Share this event with your friends

### Details

noun: baile - dance

Baile LDN is a London-based DJ collective hosting club nights that unite communities on the dancefloor to the sounds of Baile Funk, Gqom, Kuduro, UK Funky & Afrohouse.

Live Performance with [Morena Leraba](#)

Residents:  
[Emily Dust](#)  
[Mango Park](#)

**From:** [REDACTED]  
**Sent:** Monday, July 15, 2019 2:25 PM  
**To:** SouthwarkLicensing@met.police.uk  
**Cc:** [REDACTED] McArthur, Wesley  
**Subject:** TOLA - Licence Amendment and Introduction Invitation

Hi Graham,

Thank you for your representation on our application to vary our licence. I just wanted to follow up our conversation last week with this email so as to keep a record of our communication. I appreciate that you are very busy and would rather discuss our application at our subcommittee hearing so look forward to meeting you then.

However, Tom Broadbent and I would still like to extend an open invitation for you to join us at our venue when you can find the time. At the very least introduce ourselves to you formally and discuss our plans for the future of our business.

It has come to our attention that not everyone is aware of the complete change of ownership and management of the venue in 2017. We are very keen to build a relationship with the relevant parties.

Kind regards

[REDACTED]

[REDACTED]  
Managing Director  
[REDACTED]

Treadgold Ltd  
[REDACTED]  
[REDACTED]

[REDACTED]



[REDACTED]  
[REDACTED]

**From:** [REDACTED]  
**Sent:** Thursday, August 01, 2019 7:26 PM  
**To:** Graham.S.White@met.pnn.police.uk  
**Cc:** [REDACTED] McArthur, Wesley; [REDACTED]  
**Subject:** Application to vary a premises licence - Tola, 56 Peckham High Street, London, SE15 4DP (application number 868339)

Hello Graham,

As I am sure you are aware we have delayed our subcommittee hearing until the 20th of August 2019. One of the key reasons was to allow us the opportunity to meet with all representatives.

We have made fantastic progress with the reps we have met with so far. We have met and conciliated with three of five. Two have already withdrawn their representations and the third told us she would propose withdrawing on the basis of our meeting today.

I know that you said your opposition to our application was pretty standard due to the nature of the requested amendments, however we still would really like to meet with you, especially as we have dropped the request to change the opening hours.

Your representation detailed several different parts of our application. Understanding how we can alleviate the concerns raised by our requested amendments is paramount and we would like to discuss each point in detail.

The fact that we are situated inside the CIZ I believe is only applicable to certain amendments (a significant one, we are no longer intending to pursue) and so I am confident that we can conciliate on most of the other points of contention. One in particular we would like to discuss is the use of an I.D scanner.

Due to our location within the CIZ we are without question going to be the most affected by any positive or negative developments in the area. Being a part of any negatives as your representation implies would be completely counter productive to our future as a business and not something we would want to pursue. That is why we believe understanding concerns and engaging in open conversation is the most productive approach for all concerned.

We have delayed proceedings specifically to allow all parties some more time to make time for us and we are happy to come to you for your own convenience.

We really hope you will reconsider a meeting.

Kind regards

[REDACTED]

[REDACTED]  
Managing Director  
[REDACTED]

Treadgold Ltd  
[REDACTED]  
[REDACTED]  
[REDACTED]



**From:** Public Health Licensing  
**Sent:** Thursday, June 27, 2019 3:52 PM  
**To:** Regen, Licensing  
**Cc:** Shapo, Leidon; Public Health Licensing; Deidda, Clizia  
**Subject:** RE: Tola, 56 Peckham High Street, SE15 5DP

To Whom it may concern:

**RE: Tola, 56 Peckham High Street, SE15 5DP**

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 objectives:

**General Comments**

The application requests a major variation to:

- To amend condition 307 to allow an accommodation limit of 229 persons. The current accommodation limit is 100.
- To amend condition 844 to reflect the proposed change of the accommodation limit to 229.
- To remove condition 122: "No person under fourteen shall be in the bar of the licensed premises during the permitted hours unless one of the following applies a. He is the child of the holder of the premises licence b. He resides in the premises, but is not employed there c. He is in the bar solely for the purpose of passing to or from some part of the premises which is not a bar and to and from which there is no other convenient means of access or egress d. The bar is in railway refreshment rooms or other premises constructed, fitted and intended to be used bona fide for any purpose to which the holding of the licence is ancillary. In this condition "bar" includes any place exclusively or mainly used for the consumption of intoxicating liquor. But an area is not a bar when it is usual for it to be, and it is, set apart for the service of table meals and alcohol is only sold or supplied to persons as ancillary to their table meals "
- To remove condition 345: "No service of liquor other than to members, their bona fide guests and members of other snooker and pool clubs operated by the company. No person to be admitted to membership without such application being displayed within the club for 48 hours"
- To remove condition 847: "That alcohol shall not be displayed for sale and covered from view after the terminal time for the sale of alcohol. "
- To remove condition 848: "That Mr J K (known to authorities) shall no longer be allowed to have control or involvement in the management or day to day running of the premises"
- To add condition 901: "That a written dispersal policy shall be devised regarding the premises and a copy of it shall be kept / be accessible at the premises at all times that the premises are in operation from the licence"

The applicant also requests to extend Opening Hours, Entertainment hours and Sale of alcohol, and to add Late night refreshments on Friday and Saturday.

The current granted hours are:

Requested times	Opening Hours	Alcohol sales On Premises	Entertainment similar to live/recorded music - indoors	Live music - indoors	Recorded music - indoors	Late night refreshment	Performance of dance - indoors
Monday - Tuesday	10:00 – 03:00	10:00 – 00:30	10:00 – 23:00	10:00 – 23:00	10:00 – 23:00	23:00 – 02:00	10:00 – 23:00
Wednesday - Thursday	10:00 – 03:00	10:00 – 03:00	10:00 – 23:00	10:00 – 23:00	10:00 – 23:00	23:00 – 02:00	10:00 – 23:00
Friday - Sunday	10:00 – 04:00	10:00 – 03:00	10:00 – 03:00	10:00 – 03:00	10:00 – 03:00	23:00 – 00:00	10:00 – 03:00

The requested changes to the hours are:

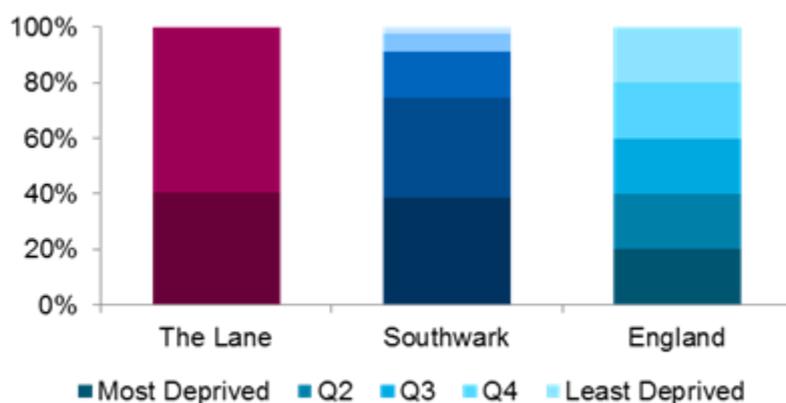
Requested times	Opening Hours	Alcohol sales On Premises	Entertainment similar to live/recorded music - indoors	Live music - indoors	Recorded music – indoors	Late night refreshment	Performance of dance - indoors
Monday - Tuesday	10:00 – 03:00	10:00 – 00:00	10:00 – 00:00	10:00 – 00:00	10:00 – 00:00	23:00 – 02:00	10:00 – 00:00
Wednesday-Thursday	10:00 - 03:30	10:00 – 03:00	10:00 – 03:30	10:00 – 03:30	10:00 – 03:30	23:00 – 02:00	10:00 – 03:30
Friday - Saturday	10:00 – 05:00	10:00 – 04:30	10:00 – 05:00	10:00 – 05:00	10:00 – 05:00	23:00 – 02:00 (F) 23:00 – 03:00 (S)	10:00 – 05:00
Sunday	10:00 – 04:00	10:00 – 03:30	10:00 – 04:00	10:00 – 04:00	10:00 – 04:00	23:00 – 03:00	10:00 – 04:00

### Concerns relating to this application

This premises is located in The Lane ward and is within the Peckham Cumulative Impact Policy (CIP) area; a geographical zone within which the current saturation of licensed premises is having a negative impact on the local area. These negative impacts include crime, anti-social behaviour (see attached report) and alcohol-related health harms.

The Lane is a ward with high levels of deprivation (Figure 1). Approximately 40% of residents are in the most deprived quintile and the other 60% of residents are in the second most deprived quintile. Additionally 24% of working age adults in The Lane are claiming out-of-work benefits. 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

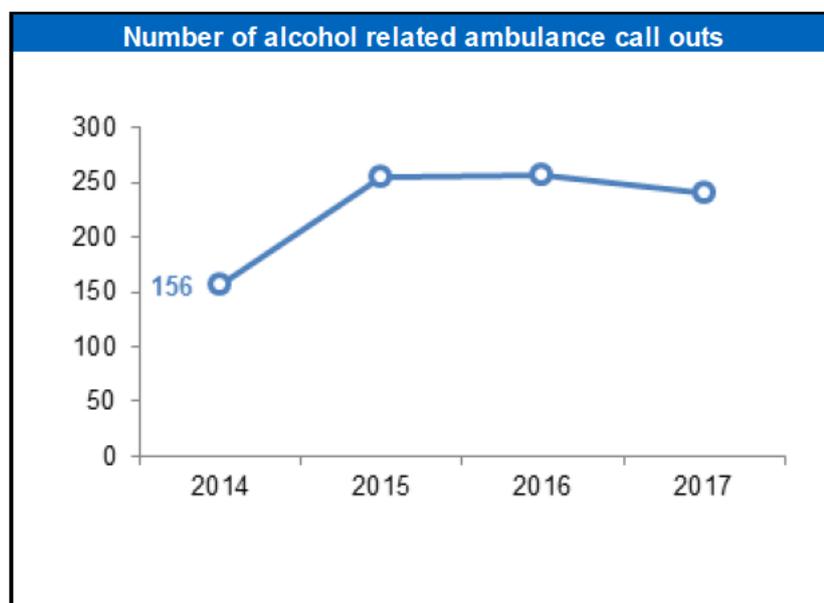


In my opinion, the applicant has not adequately rebutted the claims that the proposed premises will contribute to the alcohol related disorder in the area (i.e. through crime, anti-social behaviour and alcohol-related health impacts). The attached report shows that the Peckham CIP area contributes to 10.8% of Southwark's rowdy behaviour and street drinking, 6.1% of alcohol-related ambulance call outs and 10.4% of Southwark's non-domestic violence.

More specifically, The Lane has a statistically higher number of licensed premises to residents compared to the Southwark average and is responsible for 7% of all alcohol-related ambulance call-outs in the borough (240 in 2017 alone, increased 51% in the last 3 years, as shown in Figure 2). Furthermore, the standardised hospital admission ratio for alcohol-related harm for The Lane is statistically higher compared to England (by 2%).

Hence, it is evident that alcohol-related crime and disorder and public nuisance are causes for concern within this ward.

Fig. 2 – Number of alcohol related ambulance call outs in The Lane from 2014 – 2017



The applicant already benefits from extended hours of operation that all well beyond the Statement of Licensing Policy recommended terminal hours for this geographical area. A further extension of the hours of operation, coupled with a 129% requested increase of the accommodation limit (129 additional people), raise considerable concerns which are not adequately addressed by the applicant. In their addendum to their application (paragraph 5, page 4), the applicant states that the requested variation will not add to the cumulative impact of licensed premises in the Peckham CIP area because this is not a new premises and because they are only proposing a net increase in the opening hours of three hours.

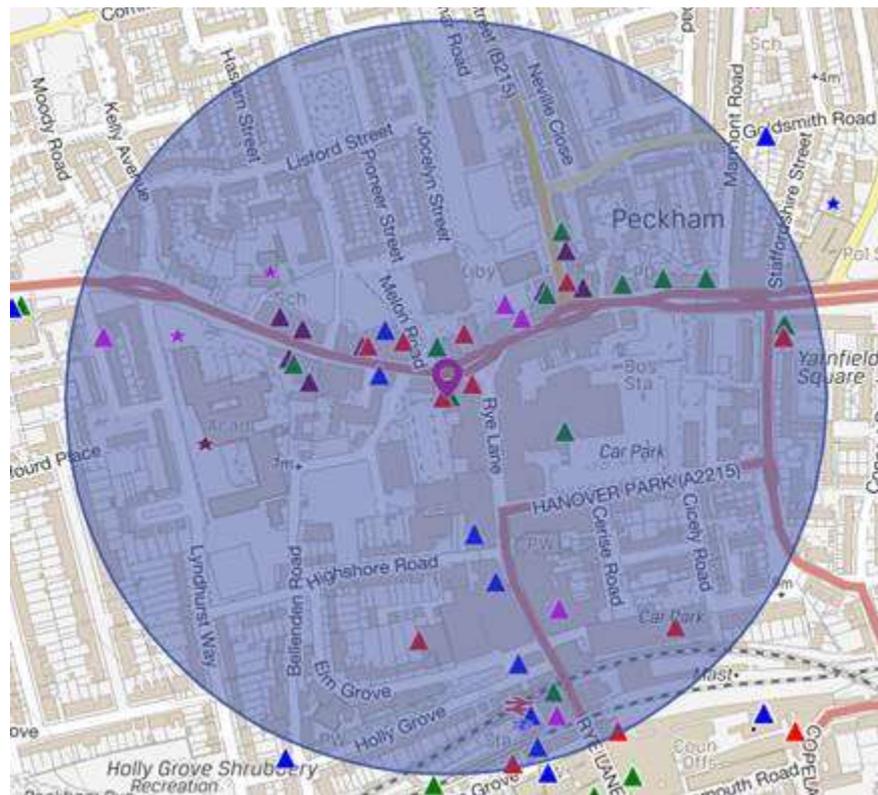
Whilst it is true that this is not a new premise, the proposed new accommodation limit will allow for an additional 129 people to be in the premises, which is likely to result in more noise disturbance, especially at the end of the night.

Furthermore, with regards to the point made about the apparently modest increase in the operating hours, it has been shown (report attached to email) that each additional 1-hour extension to the opening times of premises selling alcohol was associated with a 16% increase in violent crime (Rossow & Norstrom 2012) and a 34% increase in alcohol-related injuries (de Goeij, Veldhuizen, Buster & Kunst, 2015).

Additionally, this premises is located relatively close to local residents and therefore the dispersal from events, daily, has the potential to result in public nuisance and disturb local residents. The premises is also located within a 10 minute walk from two primary and one secondary schools. It is therefore likely that children will live close to this premises and are likely to be negatively impacted as a result. As highlighted in the second report attached, children in particular are very susceptible to sleep disturbances, that can have serious negative effects on their health and wellbeing.

In addition to this, this premises is in close vicinity of numerous other licenced establishments (Figure 3).

Figure 3 – map showing the proximity of the premises to other licensed establishments and schools



-  Licensed premises - Drinking Establishments
-  Licensed premises - Eateries
-  Licensed premises - Off-Sales
-  Licensed premises - Other
-  Licensed premises - Takeaways
-  School phase of education - Primary

**Recommendations**

To mitigate the negative impact that the requested major variation to this premises licence may have in an area that it's already saturated, I recommend this application be rejected in its current state.

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

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