



APPENDIX E

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Email: hannah.williams@punchtaverns.com

David Sawby – Principal Enforcement Officer
London Borough of Southwark
Chaplin Centre
Thurlow Street
London
SE17 2DG

4th September 2007

Dear Mr Sawby

**Re: Licensing Act 2003 – Statement of Licensing Policy Review
including Consultation regarding Cumulative Impact Policy**

Please find enclosed the response of Punch Taverns to the Statement of Licensing Policy Review including Consultation regarding Special Policy.

I trust you will find the above in order, but please do not hesitate to contact my office on the above number if I can assist you further.

Yours Faithfully

PP

**David Daniel
Head Of Compliance
Punch Taverns**

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8 SEP 2007

Consultation Response of Punch Taverns PLC to the Licensing Act 2003 Statement of Licensing Policy of the London Borough of Southwark (Saturation Policy)

Introduction

Punch Taverns PLC is a Pub Operator with a portfolio of 8,500 premises within the United Kingdom. The London Borough of Southwark proposes to introduce a saturation policy in the areas of Camberwell, Peckham and Shad Thames. Punch Taverns PLC currently have three premises that fall within the Saturation Policy areas adopted by the council, with three further premises just outside those areas. A modest increase in the designed cumulative impact area could bring this within the policy.

Response to consultation on Saturation Policy

Punch Taverns' response is based on the assumption that the saturation policy will be implemented.

On the basis that the saturation policy is implemented, Punch Taverns would submit as follows:

1. It is accepted and agreed that there should be a reputable presumption that applications for new Premises Licences or Club Certificates within the saturation policy areas should be refused if relevant representations are received.
2. Material variations should be deemed to exclude the following
 - 2.1. Applications which seek to vary the hours which existing premises within the saturation policy areas can undertake licensable activities. In this regard it is submitted that the avoidance of fixed and artificially early closing times assist in preventing rapid binge drinking and the possibility of disorder and disturbance

when large numbers of customers are required to leave premises simultaneously.

2.2. The Department of Culture, Media and Sport state in the guidance issued under Section 182 of the Licensing Act 2003 (paragraph 6.6) that "Above all, Licensing Authorities should not fix pre-determined closing times for particular areas"

3. Material variations should be deemed to include the following:

3.1 Applications which seek to increase the licensed area of a premises (be this an increase to the licensed area indoors or outdoors) by say 10% or more (to allow for modest variations to premises due to refurbishments, etc.).

PUNCH TAVERNS
04 SEPTEMBER 2007