Open Agenda

Licensing Sub-Committee

Thursday 10 September 2026
10.00 am
Innovation Space, Ground Floor, 160 Tooley Street, London SE1 2QH

Supplemental Agenda No.1

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Date: 9 September 2026

Agenda Item 5

BEFORE THE LONDON BOROUGH OF SOUTHWARK
LICENSING SUB-COMMITTEE
IN THE MATTER OF THE LICENSING ACT 2003
AND IN THE MATTER OF AN APPLICATION FOR A PREMISES LICENCE
SE5 LOUNGE, 319 CAMBERWELL ROAD, LONDON SE5 0HQ

SKELETON ARGUMENT ON BEHALF OF THE APPLICANT

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1. This skeleton argument is filed on behalf of Mr Adekunle Adejumo ("the Applicant") in support of the application for a premises licence for SE5 Lounge, 319 Camberwell Road, London SE5 0HQ ("the Premises").
2. The Applicant does not minimise the serious incident of 1 February 2026. It caused grave injury, exposed material failures in the operation of the first floor, and led to revocation of the former licence. The Applicant accepts that the service of beer in glass bottles, failures in ID scanning, inadequate upstairs security deployment and defective radio communication should not have occurred.
3. The Applicant's case is not that the history should be ignored. It is that the Sub-Committee should identify accurately what went wrong, distinguish proved and relevant matters from allegation, duplication or mere proximity, and then decide whether the present safeguards address the identified risks.
4. The determination may be approached through four questions:
   (a) What does the Police material actually establish, incident by incident, as to conduct, causal connection, management response and outcome?
   (b) What did the incident of 1 February 2026 reveal about the former operation?
   (c) What has been learned and changed, and are those changes targeted at the identified causes?
   (d) On the evidence now before Members, can the Premises operate consistently with the licensing objectives under the proposed, enforceable regime?

5. The Applicant respectfully submits that the answer to the final question is yes. The application should be granted subject to the strengthened conditions and any further precise and proportionate condition which Members consider appropriate.

Legal and policy framework

6. The four licensing objectives are of equal importance. The Sub-Committee must determine this new application on its individual merits, having regard to the Licensing Act 2003, the February 2026 statutory Guidance under section 182, and Southwark's Statement of Licensing Policy 2026–2031 ("the Policy").
7. The statutory Guidance, paragraphs 9.42–9.44, requires an evidence-based determination, justified as appropriate for the promotion of the licensing objectives and proportionate to what it is intended to achieve. The assessment must consider the evidence of risk and benefit, the burden of any restriction, and the safeguards already proposed.
8. The Police are the principal source of advice on crime and disorder, but they are not the decision-maker. Paragraph 9.12 of the Guidance recognises their expertise while requiring responsible-authority representations to withstand scrutiny at the hearing. Members must reach their own conclusion on relevance, reliability, causation and weight.
9. The Policy confirms that each application is to be considered on its own merits; that the authority will interfere with an operating schedule only to the extent appropriate to promote the licensing objectives; and that the Policy is not to be applied rigidly. It also recognises both the contribution of well-run licensed premises and the need to protect residents from irresponsible operation.

Appropriateness, proportionality and the forward-looking approach

10. The statutory test is whether any step taken by the Sub-Committee is appropriate for the promotion of the licensing objectives. Paragraphs 9.42 to 9.45 of the statutory Guidance require an evidence-based determination, justified as appropriate for the promotion of the licensing objectives and proportionate to what it is intended to achieve. Any restriction must therefore respond to an identified risk, be supported by the material before Members and go no further than is appropriate to address that risk. The likely effectiveness of the conditions, management arrangements and operating controls offered by the Applicant is central to that assessment.

11. In East Lindsey District Council v Abu Hanif (trading as Zara's Restaurant and Takeaway) [2016] EWHC 1265 (Admin), Jay J held at paragraph 15 that the statutory word "appropriate" imports, by necessary implication, the concepts of proportionality and relevance. The licensing objectives are prospective and concerned with the avoidance of harm in the future. The decision must therefore address the future risk disclosed by the evidence and the measures now available to control it.

12. In R (Daniel Thwaites plc) v Wirral Borough Magistrates' Court [2008] EWHC 838 (Admin), the High Court emphasised that restrictions on licensable activities must be founded upon evidence relevant to the licensing objectives and not upon unsupported speculation. Members may assess risk and draw reasonable inferences, but the conclusion must be measured against the evidence actually placed before them.

13. R (London Borough of Lambeth) v Ashu [2017] EWHC 3685 (Admin) concerned a licensing appeal rather than a new application. It nevertheless confirms the significance which altered circumstances and the passage of time may have when considering whether an earlier licensing outcome remains correct. Stuart-Smith J stated at paragraph 19 that a decision may have been beyond criticism when made, yet the passage of time may make it wrong when later reviewed because of changed circumstances or even the passage of time alone.

14. In the present application, historic matters remain relevant only to the extent that they provide reliable evidence of a continuing risk. Their weight depends upon their age, outcome, causal connection, the response made at the time and whether the circumstances which gave rise to them remain present. The Sub-Committee must determine the application on the current evidence and the operation now proposed.
15. The Applicant acknowledges that the Premises falls within the Camberwell Cumulative Impact Area and that the assessment represents a strong statement of the Licensing Authority's intended approach. It does not, however, predetermine this application. The Premises already has an existing premises licence. This application does not create a new venue, increase the number or density of licensed premises within the area, or of itself add a further body of customers to the night-time economy. On the contrary, the operation now proposed is more restricted and more closely controlled, including the exclusion of the first floor, reduced capacity, reduced hours, new DPS arrangements, replacement security provision and strengthened conditions. The Sub-Committee must therefore assess the likely effect of this particular application rather than proceed from the incorrect premise that any new licence document necessarily amounts to an additional contribution to cumulative impact.
16. The distinction between a new licence and a new licensed operation is important. Although the application is formally an application for a premises licence, the Premises is not an unlicensed site seeking to introduce a new late-night venue into Camberwell. An existing authorisation already applies to the Premises. The practical and evidential question is whether the application would increase the cumulative impact, or whether it would instead regulate the continuing operation of an existing venue through a revised, more restrictive and more enforceable licensing framework.

The serious trigger incident and the Applicant's response

17. The incident of 1 February 2026 is the proper starting point when considering the concerns relating to crime and disorder and public safety. It occurred in the newly opened first-floor area and resulted in serious injuries. The Applicant acknowledges the gravity of the incident and accepts that it revealed material deficiencies in the management and operation of that area.

18. The Applicant accepts responsibility as operator. His evidence is that an upstairs manager departed from the established decanting arrangements and instructed security not to scan a limited group associated with DJs. Security followed that instruction. That account is not advanced as an excuse. It identifies failures of supervision, delegation and verification which required structural correction.

19. The correct regulatory inquiry is not whether the incident was serious. It plainly was. The inquiry is what caused the failures and whether the present response is sufficient to prevent recurrence. Licensing is protective and forward-looking. It is not the function of this hearing to determine criminal liability or impose punishment for its own sake.

20. The Applicant has retained Mr Adrian Studd, an independent licensing consultant and retired Metropolitan Police Chief Inspector with extensive licensing experience. His report identifies the material weaknesses and proposes controls directly responsive to them.

21. The central changes are:

    (a) the first floor, where the serious disorder occurred, is excluded from the licensed operation, reducing capacity and simplifying supervision;

    (b) a new DPS is to undertake day-to-day management, with a personal licence holder on duty and a clear written record of responsibility;

    (c) the former security company and door staff are to be replaced, with staffing governed by a detailed risk assessment;

    (d) all door supervisors are to use a common radio channel;

    (e) universal ID scanning and searching are to apply to patrons, staff, security, DJs and associated personnel, subject only to the tightly defined exceptions proposed;

    (f) no glass bottle or container is to enter a public area, with service through polycarbonate containers or carafes;

    (g) furniture, incident reporting, staff training, drugs prevention, welfare and dispersal procedures are strengthened; and

    (h) licensable hours are reduced from those previously enjoyed.

22. These are not general promises of future improvement. They are operational controls directed to the causes identified by the incident. Mr Studd concludes that, if the proposed conditions are attached, the Premises can operate to a high standard and fully support the licensing objectives.

Police evidence: incident-by-incident analysis

23. The Applicant accepts that relevant Police information may properly be placed before Members. However, MAL/7 and MAL/8 should not be treated as an undifferentiated history or as a numerical scorecard against the Premises.

24. For each matter relied upon, the Sub-Committee should ask:

    (a) what was reported, when and where;

    (b) whether those involved were established to be patrons or otherwise connected to the Premises;

    (c) whether the event occurred inside, at the entrance, nearby or merely opposite the Premises;

    (d) whether it was crimed and what the final investigative outcome was;

    (e) what management or security did;

    (f) whether any adverse finding was made against the licence holder, management or staff;

    (g) whether advice, warning, action planning, monitoring or enforcement followed; and

    (h) what the matter proves about the likely operation under this new application.

25. An initial CAD classification, an allegation, intelligence, a recorded crime, an arrest, a charge, an investigative outcome and an adverse regulatory finding are different things. They should not be conflated. Nor does geographical proximity alone establish a causal connection to licensable activities or management failure.

26. The disclosure exercise demonstrates the need for that discipline. Following inspection of the underlying records, the Police withdrew CADs 717, 1360 and 5650/5876 and amended the schedules to clarify linked or duplicate references. The original presentation therefore required material correction before the hearing.

27. The Applicant does not contend that every matter ending in no further action must be ignored. The submission is more measured: the outcome, evidential deficiency and absence of an adverse finding bear directly upon weight. Members should not treat an unproved allegation as proof of a management failing merely because an incident number exists.

28. A number of matters positively record security searching persons, discovering prohibited items, detaining individuals, calling or flagging down Police, assisting officers, or themselves being assaulted. Such incidents may demonstrate risk within the night-time economy, but where the search and intervention worked, they do not rationally prove tolerance or facilitation of crime by management.

29. The Applicant will invite the Police and Licensing Authority to identify their contemporaneous response to the historic matters now aggregated against the application: whether the operator was notified of a management concern; whether advice or a warning was given; whether an action plan was proposed; whether compliance was revisited; and whether enforcement or review was considered.

30. The Applicant does not put the point as an absolute rule that absence of enforcement prevents later reliance. Rather, it is evidence relevant to seriousness, management knowledge, opportunity to remedy and weight. If an incident is now said to demonstrate systemic or persistent failure, Members are entitled to ask how it was assessed at the time and what regulatory response it attracted.

31. Paragraph 11.10 of the statutory Guidance encourages early warning and advice where responsible authorities identify problems. Southwark's Policy likewise provides for monitoring, risk-based enforcement, communication of investigation results, partnership working and good communication with responsible operators.

32. Against that framework, the present allegation of longstanding or systemic management failure requires careful examination. At the March 2026 review, the Licensing Authority accepted that the complaints against the Premises were no more than those received in respect of other venues in the borough, and that the majority concerned noise. The Police also accepted that the Premises had not been visited for some time due to competing priorities. Those matters sit uneasily with the present attempt to aggregate a substantial body of historic incidents as evidence of a persistent and previously recognised crime and disorder problem.

33. The Applicant does not suggest that the absence of previous enforcement is conclusive, or that it prevents the Police from relying upon relevant evidence now. It is, however, relevant that the majority of the matters now relied upon did not result in a contemporaneous warning, action plan, stepped intervention or adverse regulatory finding. If those incidents are now said to establish a longstanding or systemic management failure, Members are entitled to ask how they were assessed at the time, whether the Premises was informed of the alleged concern, and what opportunity was provided to address it or to demonstrate that it was irrelevant or lacked any causal connection to the Premises.

34. The incident of 1 February 2026 stands in a materially different category. It was a serious trigger event, produced immediate regulatory consequences and required a comprehensive response. The Applicant does not rely upon the absence of earlier intervention as an answer to that incident. The Applicant addresses it directly by identifying the operational failures, accepting responsibility for them and demonstrating the specific measures now proposed to prevent recurrence.

Public nuisance, external activity and local evidence

35. The public nuisance case must also be tested for source and causal connection. Paragraphs 2.20–2.26 of the statutory Guidance require focus upon the effect of licensable activities at the specific Premises. Southwark's Policy recognises that licensing is not the primary mechanism for controlling conduct once people are away from premises and beyond the operator's direct control.

36. The Applicant's evidence is that an independent food vendor operating near Camberwell Green around closing time attracts persons who congregate, shout and leave litter. The 2023 proceedings considered noise and activity in the vicinity. The Applicant will rely upon the 2023 decision and underlying material to distinguish noise caused by the Premises from unrelated activity in the park, on transport routes and around the external vendor.

37. That issue must be approached on evidence, not assumption. A person found near 319 Camberwell Road is not necessarily a patron. The Police material itself contains examples in which connection to the Premises was absent, disputed or not established.

38. The supporting representations are material countervailing evidence. They include long-term residents, women who report feeling safe, a person residing at the Premises who identifies bus noise, a resident of more than 18 years who reports no threat or disturbance, and staff describing the impact of closure upon employees and their families.

39. The letters of support do not extinguish every complaint, but they demonstrate that the local experience is not uniform and that the Premises has supporters with direct and longstanding knowledge of the area. Their evidence should be evaluated alongside the objectors' evidence, not treated as incidental.

40. The proposed dispersal arrangements respond directly to the policy concerns: gradual wind-down, increased lighting, visible management, active door supervision, no drinks outside, quiet-departure signage, taxi information, and positive direction of customers away from Camberwell Green and neighbouring residential properties.

Long trading history, present management and confidence

41. The Applicant has operated at the Premises since July 2008. The history is not without regulatory events, but nor is it accurately described as uninterrupted serious disorder. The March 2026 decision itself recorded that complaints were no more than those received in respect of other venues in the borough and attached limited weight to unverified complaints with limited detail.

42. The Applicant accepts that confidence cannot be restored by length of tenure alone. It must be earned through candour, demonstrable learning and enforceable controls. His acceptance of the February failings, appointment of a new DPS, retention of independent expertise, redesigned operation and willingness to accept robust conditions are central to that assessment.
43. The proposed licence gives Members a means to translate the lessons learned into enforceable obligations. Southwark's Policy requires conditions to be appropriate, precise, enforceable, tailored, proportionate and capable of being met. The Applicant invites that approach.
44. If Members identify a residual risk capable of control, the proportionate response is to formulate the necessary condition or limitation. Refusal is appropriate only if Members conclude, on evidence and with reasons, that the present application would undermine the objectives and that conditions would be ineffective.

Cumulative impact and hours

45. The Applicant recognises that the Premises is situated within the Camberwell Cumulative Impact Area and that the published cumulative impact assessment represents a strong statement of the Licensing Authority's intended approach to applications within that area. It does not, however, determine the outcome of this application in advance. The statutory Guidance confirms that the fundamental manner in which licensing applications are determined remains unchanged, and that each application must be considered individually and on its own merits.
46. There is an important distinction in this case between an application for a new premises licence and the introduction of an additional licensed operation into the cumulative impact area. The Premises already benefits from an existing premises licence, which is subject to an appeal. The present application does not introduce another licensed venue, increase the number or density of licensed premises within Camberwell or, without more, add an additional body of customers to the night-time economy.

47. The proper comparison is between the operation already authorised at the Premises and the more restricted and controlled operation now proposed. The proposed arrangements include:

    (a) the exclusion of the first floor from the licensed operation;

    (b) a reduced and simplified operational footprint;

    (c) reduced capacity;

    (d) reduced hours;

    (e) a new DPS and strengthened management structure;

    (f) replacement security provision;

    (g) universal ID scanning and searching;

    (h) common radio communication between security staff;

    (i) the removal of glass containers from public areas;

    (j) a documented dispersal procedure; and

    (k) independent professional oversight.

48. Those measures are not relied upon merely as general examples of good practice. They are directed at the particular operational risks identified from the history of the Premises and the incident of 1 February 2026. The application therefore provides the Sub-Committee with an opportunity to place the future operation of an existing venue within a more restrictive, transparent and enforceable framework.

49. The Policy records that reported alcohol-related rowdy behaviour and street drinking within the cumulative impact areas was, at the time of the assessment, at its lowest level since the introduction of those areas. The Policy nevertheless requires the individual application to be examined to determine whether its grant would further impact upon the licensing objectives.

50. The relevant question is therefore not simply whether the Premises lies within the Camberwell Cumulative Impact Area, which is accepted. The question is whether the particular operation now proposed would make any material additional contribution to the cumulative impact identified by the Policy, having regard to the existing licence and the differences between the existing authorisation and the present application.

51. The Applicant submits that the proposed operation would not increase the number or density of licensed premises and would not materially add to the identified cumulative impact. On the contrary, it represents a reduction and strengthening of the operation through a smaller licensed footprint, reduced capacity, reduced hours, revised management, additional safeguards and more extensive enforceable conditions.
52. If Members nevertheless conclude that the hours sought would risk making a material contribution to cumulative impact, the Applicant invites them to consider whether that concern can be addressed by appropriate hours and conditions rather than refusing the application in its entirety. The statutory Guidance requires any determination to be evidence-based, justified and proportionate to the licensing objective which it is intended to promote

Conclusion

53. The Applicant does not ask Members to disregard the history of the Premises or to minimise the gravity of the incident of 1 February 2026. The Applicant asks Members to identify with precision what went wrong, examine what has changed and assess whether the present safeguards answer the identified risks.
54. The Police material should be considered carefully, but incident by incident. Appropriate distinctions must be maintained between an allegation, intelligence, an initial CAD classification, a recorded crime, an investigative outcome and an adverse finding against the Premises or its management. Withdrawn, duplicated, unrelated or unsubstantiated matters should not, by their accumulation, create an impression of continuous proved management failure.
55. The serious incident of 1 February 2026 revealed identifiable operational and management failures. Those matters have produced a targeted response, including exclusion of the first floor, reduced capacity and hours, new DPS arrangements, replacement security, universal scanning and searching, unified radio communication, removal of glass from public areas, detailed written policies and independent professional oversight.

56. The Sub-Committee is required to undertake a forward-looking, evidence-based and proportionate assessment. Historic failings do not create a permanent prohibition against the grant of a further licence, particularly where the Premises already benefits from an existing authorisation and the operation now proposed is materially smaller, more restrictive and more closely controlled.
57. The Applicant's long operating history, acknowledgment of the February 2026 failings, evidence of learning, local support, the independent evidence of Mr Adrian Studd and willingness to accept comprehensive enforceable conditions provide a proper evidential basis for confidence in the future operation.
58. If Members identify any remaining concern capable of effective control, the Applicant invites the Sub-Committee to address it by a precise, enforceable, appropriate and proportionate condition or, if necessary, a limitation of hours. Refusal should be reserved for a reasoned conclusion that the identified risk cannot adequately be controlled by those measures.
59. The Applicant therefore respectfully invites the Sub-Committee to grant the application subject to the proposed conditions and any further appropriate and proportionate safeguard considered necessary for the promotion of the licensing objectives.

David Dadds, Barrister

Solicitor-Advocate

Partner

Dadds LLP

8th September 2026

Planet Nollywood

319 Camberwell Road, London, SE5 0HQ.

Report for new licence application

by

Adrian Studd, Independent Licensing Consultant.

Introduction

1. I have been instructed by Dadds LLP solicitors in connection with an application for a new premises licence at the above premises. The previous licence was revoked in March 2026 following an incident that took place at the premises on 1st February 2026.

2. I have been engaged to work with the premises management to consider measures that can be implemented at the premises that would allow the premises to re-open with a new licence while ensuring that it is run in a manner that fully supports the Licensing Objectives moving forward.

Summary of Expertise.

3. I retired from the police service on 2nd November 2012 having completed 31 years exemplary service with the Metropolitan Police in London. Between January 2012 and my retirement, I was employed as the Chief Inspector in charge of licensing for the London Olympic Games 2012. In this role, I headed up a team of officers with responsibility for supervision of licensing compliance at all the Olympic venues, including the Olympic Park. In addition, I was responsible for ensuring that any associated events were properly licensed, sufficiently staffed and operated in accordance with the licensing legislation and best practice to ensure the safe and effective delivery of the Olympic Games.

4. In addition to leading my team, I visited and worked with both the Olympic Park management and many other venues, reviewing their policies and procedures, and ensuring that the Games were delivered safely and securely. The success of this operation not only protected the reputation of the MPS but provided positive benefits for the profile of the MPS and the United Kingdom. I was awarded an Assistant Commissioners Commendation for this work.

5. Prior to this role, between Jan 2002 and January 2012, I was employed first as an Inspector and then as a Chief Inspector on the MPS Clubs and Vice Unit (Now SCD9 Serious and Organised crime command). My responsibilities over this period focussed on licensing and included day to day supervision of the licensing team that had a London wide remit to support the Boroughs with licensing activity.

6. Providing both Overt and Covert support for policing problem licensed premises across London, my team worked with premises when licensing issues were identified, to address these problems using action plans to raise their standards. Where this failed, I would support the Boroughs with evidence for use at review hearings if required.

7. From 2004 until 2008, my role included representing the MPS and ACPO licensing lead both in London and Nationally. In this role, I developed key partnerships with industry, NGOs, and Government departments to improve the standards at licensed premises. I sat on the BII working party and helped develop the national training for Door Supervisors and worked with the SIA to successfully introduce the new regime within London. I sat on several Government working parties and worked closely with the alcohol harm reduction team on identifying best practice and ensuring this was used both within London and nationally by police and local authorities.

8. I was involved with Best Bar None for several years and successfully helped several boroughs to implement the initiative. I was a trained Purple Flag and Best Bar none assessor and, until my retirement, I sat on the Board for Best Bar None in the Royal Borough of Kensington and Chelsea. For the last five years of my service, I oversaw

licensing for the Notting Hill Carnival, the largest street carnival in Europe. During this time, I contributed to a reduction in violence overall at the Carnival and delivered increased seizures of illegal alcohol, reduction of unlicensed alcohol sales and a reduction in alcohol related violence. In addition, I have attended many internal MPS training and qualification courses, and I am trained in conducting health and safety risk assessments and hold the National Certificate for Licensing Practitioners, issued by the British Institute of Inn keeping (BII).

9. Following my retirement I have worked as a licensing consultant working to improve standards and provide independent advice for premises requiring a local authority licence. I have provided evidence gathering services and advice to a broad range of licensed premises on a variety of issues, including crime and disorder, noise and nuisance, cumulative impact, sexual entertainment, street drinking, rough sleepers, age related products, betting and gaming and planning. This work has involved premises that benefit from licences for activities such as alcohol on and off licences, betting premises licences, SEV licences and late-night refreshment.

Issues highlighted by the incident.

10. I first met with the premises DPS and business owner in March 2026 when preparing for the Review of the Licence following the incident in February. Mr Kunle ADEJUMO accepts there have been some issues at his premises but is striving to run a premises that provided a focal point for the community in Camberwell to a high standard. He expressed shock at what had happened and is determined, if he is granted a new licence, to ensure that a similar incident could not take place in the future.

11. Mr. ADEJUMO considered that he had been let down by some of his employees, and I agree with that assessment. Most notably the ACS accredited security company that provided the Door supervisors whose deficient performance and failure to adhere to

the measures set out on the licence and by Mr. ADEJUMO led to the incident. As DPS he acknowledged his own failures and that he had failed to supervise the premises to the high standard he strived for.

12. Speaking with Mr. ADEJUMO and inspecting the premises we considered what had led to this situation. He had recently opened the first floor of the premises that added 110 to the overall capacity of the premises, raising it from 350 on the ground floor to a total of 460. A significant increase. The access and security measures in place did not fully support this. There is a single entrance to the premises with door supervisors at the entrance managing customers entering both parts of the premises, they were expected to manage the numbers on both floors in addition to searching, using a search wand and using the ID scanner.

13. A single door supervisor was employed on the first floor, and he did not have a radio on the same channel as those downstairs. The incident identified that bar staff had served bottles over the bar, in contravention of the licence conditions. The disturbance also highlighted that the chairs in the premises could be used as weapons, and I understand that police believe it was these chairs that caused some of the injuries.

14. As DPS Mr. KUNJUMO had responsibility for day to day running of the premises. He now accepts that with the other pressures on his time he did not have sufficient time to properly fulfil the roles responsibilities of the DPS and has recruited Mr. Remi Jackson to be the new premises DPS.

New Licence Application.

15. The premises has now been closed for approximately 6 months. This has allowed Mr. ADEJUMO to consider, with external advice, how he could ensure the premises could

run to a high standard while still enabling the business to thrive, contribute to the community in Camberwell and provide employment for local people. I have discussed appropriate measures with him at length, and we have drawn up an outline of how the premises could be successfully run while promoting the licensing conditions to a high standard.

16. **Reduction in premises capacity**. The first floor will be excluded from the licensed area of the premises and will not be used. The first floor was the location of the disturbance and highlighted the difficulty in managing the two floors simultaneously. In addition to making robust supervision of the premises more straightforward this closure will reduce the capacity of the premises by 110 to a maximum of 350.

17. The new DPS will ensure that he is able to spend significant time at the premises and be fully involved and responsible for the day to day running of it. Mr. ADEJUNO will retain his personal licence and will be at the premises when the DPS is off duty. In addition, there will be at least one other personal licence holder who will perform the role of manager if both the new DPS and Mr. ADEJUNO are not at the premises. There will be a staff log that will clearly record which personal licence holder is on duty and responsible for management of the premises.

18. **Door Supervisors.** A detailed risk assessment will be conducted with support from police and the local authority on the number of doors supervised required at the premises. On every night of operation at least one door supervisor will be female. The previous security company and all door supervisors who have worked at the premises will be replaced with a new, reputable, SIA accredited security company. All Door Supervisors will be equipped with radios and all will be on the same radio channel and able to send and receive communication to each other in any part of the premises.

19. **Glass containers**. No glass bottles or containers will be served to customers or permitted in the public areas of the premises. Where possible all beer will be stocked

in cans behind the bar and served in polycarbonate containers. Any glass beer bottles that are stocked will be decanted in polycarbonate vessels prior to service. Spirits, wine, champagne and other drinks only available in glass bottles will be served in polycarbonate containers in standard measures. Should customers wish to purchase a bottle, for example for a table, this will be served over the bar in polycarbonate single or double shot containers and the glass bottle marked with the customer's name and kept behind the bar. If the customer requests the whole bottle can be decanted into a polycarbonate carafe' and served to the table.

20. **Furniture.** Where appropriate fixed banquette seating will be used around the premises. Where this is not possible the design of suitable chairs will be discussed with police.

21. **ID Scanning**. Except for Mr. ADEJUNO and the DPS everyone entering the premises will be ID scanned and anyone who does not have acceptable ID will be refused entry. This includes SIA security, bar staff, waiting staff and all DJ's and associated staff.

22. **Searching and use of search wand.** Everyone entering the premises, except for the DPS and Mr. ADEJUNO, will be subjected to a full search, including the use of a search wand, and anyone with prohibited items or who refuses to be searched will be refused entry. This includes all employees at the premises.

23. The premises shall be licenced for the sale of alcohol until 02.30 with the premises remaining open for 30 minutes until 03.00 hours for a wind down period.

Conclusion

24. If these Conditions are attached to the new licence I am confident that the premises will operate to a high standard and fully support the licensing objectives.

Adrian Studd,

Independent Licensing Consultant.

23/06/2026.

PETER OTU

Email: [redacted] | Location: [redacted]

PROFESSIONAL PROFILE

Results-driven and safety-conscious Designated Premises Supervisor (DPS) and Venue Operations Manager with extensive multi-site hospitality, bar management, and large-scale event oversight experience. Fully certified Personal Licence holder with deep operational familiarity with the Licensing Act 2003, licensing objectives, and regulatory compliance. Proven track record in managing security teams, leading bar and floor staff, maintaining strict health and safety standards, stock control, and fostering a safe, profitable environment for high-capacity venues.

CORE COMPETENCIES & EXPERTISE

- **Licensing & Statutory Compliance:** Expert enforcement of licensing objectives, underage sales prevention (Challenge 25), capacity monitoring, and liaison with police and local authorities.
- **Venue Operations & Supervision:** Directing daily bar and floor operations, cash handling reconciliation, stock auditing/ordering, and facilities oversight.
- **Staff Leadership & Rota Management:** Recruiting, training, supervising, and scheduling front-of-house teams, bar staff, and floor supervisors.
- **Safety, Security & Incident Control:** Managing door security teams, conducting risk assessments, executing fire safety protocols, and conflict de-escalation.
- **Event & Entertainment Management:** Overseeing high-volume weekend club nights, live entertainment programming, promoter relations, and social media marketing.

PROFESSIONAL EXPERIENCE

Deputy Manager | **Stonegate Group** Jun 2023 – Feb 2025

Delivered fantastic customer experiences across diverse high-street pubs, branded bars, and late-night venues operating within the UK's largest pub company.

- Executed daily, weekly, and monthly statutory and operational paperwork.
- Conducted rigorous stock auditing, ordering, cellar management, and supplier coordination.
- Covered and oversaw operations across multiple company venues when required.
- Liaised directly with door security and bar staff to ensure the smooth, safe running of high-capacity evening and weekend operations.
- Managed cash handling, banking, change pick-ups, and end-of-week financial reconciliation.
- Ensured strict adherence to bar cleaning tasks and health & safety standards in accordance with daily and weekly schedules.

Duty Manager / Acting GM | **Dice Bar & Nightclub** Jul 2019 – Feb 2023

Supervised a high-volume cocktail bar, sports bar, and nightclub venue.

- Promoted events and business presence through targeted social media marketing to increase footfall and revenue.
- Handled initial staff grievances and performance issues promptly.
- Ensured strict venue opening and closing protocols, securing all back and front-of-house areas, and signing off staff promptly.
- Drove business growth, operational efficiency, and profitability across bar and nightclub operations.

Duty Manager | **Stonegate Group** Apr 2017 – Jun 2019

Supervised community pubs, branded bars, and late-night venues to deliver exceptional guest experiences and maintain compliance.

- Handled daily, weekly, and monthly operational compliance documentation.
- Oversaw stock auditing, cellar maintenance, and ordering.
- Provided structured shift handovers and feedback to incoming managers and supervisors.
- Supervised front-of-house staff, maintaining top-tier quality and hygiene standards.
- Managed cash handling, banking reconciliation, and facility cleanliness audits.

Manager in Training | **Novus Leisure** Oct 2015 – Jan 2016

Trained across prominent UK bars and nightclubs operating within a 41-venue portfolio.

- Monitored staff performance, corrected bad practices, and maintained high productivity standards.
- Conducted staff training sessions and performance evaluations.
- Collaborated with senior management and resolved customer service escalations.

Various Roles | **Stonegate Group** Nov 2013 – Sep 2016

Delivered fantastic customer experiences across community and high-street pubs, branded bars, and late-night venues.

- **Roles Held:** Floor Supervisor, Bartender, Cellar Man, and Team Leader.
- Managed floor staff to maintain clear, clean public areas, efficient drink running, and well-stocked bars.
- Managed stock rotation, received deliveries, and maintained cellar standards.

CERTIFICATIONS & QUALIFICATIONS

- **Level 2 Award for Personal Licence Holders (APLH)**
- **NVQ Level 2 Award in Food Safety & Hygiene**
- **First Aid at Work (FAW)**

METROPOLITAN POLICE TOTAL POLICING

Southwark Council Licensing Unit
Floor 3
160 Tooley Street
London
SE1 2QH
Re: Ref No. 2563130

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

Mobile – [redacted]
Email – [redacted]

Date: **11/05/2026**

SE5 Lounge - 319 Camberwell Road London SE5 0HQ

Dear Sir/Madam,

Police are in possession of an application from the above for a new premises licence for the supply of alcohol on sales ,Late night refreshment, recorded music, live music , with a new set of hours and conditions. The venue is situated on Camberwell Road and is designated as Camberwell District Town Centre by the Southwark Council statement of licensing policy. The applicant requests the following operating hours

Hours premises are open to the public
Mon-Thur-1000hrs-0330hrs
Fri-Sat-Sun1000hrs-0530hrs

Recorded Music
Mon-Thur-1000hrs-0300hrs
Fri-Sat-Sun1000hrs-0500hrs

Live Music
Mon-Thur-1000hrs-0300hrs
Fri-Sat-Sun1000hrs-0500hrs

Late Night refreshment
Mon-Thur-2300hrs-0300hrs
Fri-Sat-Sun 2300hrs-0500hrs

Alcohol for supply on premises
Mon-Thur-1000hrs-0300hrs
Fri-Sat-Sun1000hrs-0500hrs

The venue is situated in Camberwell District Town Centre however there are residential buildings in proximity, the hours requested far exceed those recommended within the Southwark statement of licensing policy which is the latest terminal hour of 0100hrs for this type of application.

METROPOLITAN POLICE **TOTAL POLICING**

The venue (Previously Planet Nollywood) has a history of ASB and crime – most recently in 2026 when whilst breaching licencing conditions – five individuals suffered GBH injuries – leading to the venue having its licence revoked.

Based on the current application and conditions I can confirm that the Metropolitan Police objects to this application as it is likely that if the application where to be granted, the premise would undermine the following licensing objective/s:

The Prevention of Crime and Disorder.

The proposal made is likely to undermine the following licensing objectives:

- **The Prevention of Crime and Disorder**
- **Public Safety**

Submitted for your consideration.

Yours Sincerely

[redacted]
Police Licensing Officer
Sector 4 SDU
SouthwarkLicensing@met.police.uk

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

Date: **24/08/2026**

Re: SE5 Lounge 319 Camberwell Road SE5 0HQ

I am a Metropolitan Police Officer with twenty-one (21) years of service, and for the past seven years I have worked as part of the Southwark Police Licensing and Night-Time Economy Team in the role of Licensing Officer.

This representation relates to a new premises licence application for SE5 Lounge, 319 Camberwell Road, SE5 0HQ. The Police makes this additional representation further to its initial representation dated 11 May 2026.

The applicant and proposed premise licence holder is Mr Adekunle ADEJUMO (date of Birth 07/05/1969). Mr ADEJUMO was the premises licence holder for a venue known as Planet Nollywood, which operated from the same address up until its licence was revoked in March 2026 earlier this year.

The Police object to this application on the grounds that the grant of a new premises licence would undermine the licensing objectives of the Prevention of Crime and Disorder and Public Safety. The history of operation of the previous premises demonstrates the applicant's failure to uphold the licensing objectives on a number of occasions, some of which have led to serious crime, disorder and harm. The Police have no confidence that the applicant will be able to promote the licensing objectives were this new licence to be granted. Given the history of breaches of conditions, the Police do not consider there to be any appropriate conditions that would make the application acceptable.

The relevant history of the previous premises licence held by Mr ADJUMO in respect of Planet Nollywood is outlined below and is evidenced the attached documents MAL/1-8.

The premises has been the subject of three reviews

- The Police applied for a review following an incident involving serious crime and disorder within the premises in February 2026. A violent altercation occurred in which several intoxicated persons were hospitalised following a fight in which glass beer bottles were used to inflict serve lacerations and wounds to the parties involved. In finding a number of breaches of licence conditions, the licensing sub-committee considered that the venue had "*a total disregard for licensing conditions intended to protect patrons and staff and the licensing objectives*". It determined to revoke the licence. This decision, dated 3 March 2026, is provided at MAL/6.

- A review was brought in 2023 by residents due to ongoing noise and anti-social behaviour issues. The licensing sub-committee determined to modify the conditions of the premises licence. This decision, dated 6 July 2023, is provided at MAL/5.

- The Police applied for a review in 2011 following an incident of serious crime and disorder whereby a male carrying two loaded firearms was able to enter the premises unchallenged. The licensing sub-committee determined to suspend the licence. This decision, dated 12 May 2011, is provided at MAL/1.

In addition to the above licence reviews, there have also been incidents when the premises showed a disregard for licence conditions and other regulations: In September 2020, during Police visits to check for compliance, the premises were found to have placed both staff and members of the public at serious health risks by operating as a night club contrary to the Health Protection (Coronavirus Restrictions) Regulations. Attending officers also had to withdraw from the venue due to officer safety, as patrons of the premises had become hostile. The premises was later issued with a prohibition notice and notification of alleged offences. This is documented in the witness statements provided at MAL/3 and MAL/4.

During a compliance visit made by Police in November 2019, the manager on duty was found to be unable to operate the CCTV or show it to be in full working order in breach of licence condition. This is recorded at MAL/2.

The crime and disorder at the premises is also recorded in Police crime reports at MAL/8. These include allegations of drug dealing, theft and violent behaviour both inside and on the perimeter of the venue. The log of calls made to Police is documented at MAL/7.

The Police's view is that there is a track record of violence occurring at the premises previously managed by the applicant. Despite the imposition of many conditions, this violence has continued. The Police therefore has no confidence that a new premises licence involving the same operator, the same hours and effectively the same conditions could uphold the crime and disorder licensing objective. In particular, the Police draws attention to the following view of the licensing sub-committee that revoked the licence in March 2026: "*For the premises to exist as a nightclub, there requires a complete change in the premises licence holder and management Team, including the DPS*." Here, there is no change to the premises licence holder. In this vein, the Police also notes that the proposed DPS for this application worked in a security capacity at the previous premises and is very much a part of the same failed management team.

In respect of conditions, the applicant has provided a schedule of conditions which mirror those on the previously revoked licence, and although they expand on some of these conditions within the operation manual, experience shows that these conditions have failed not only to prevent violence occurring at the venue but also failed to deal with it properly when it did occur. More importantly, the central issue is that these are the same conditions with which the premises has failed to comply in the past under the applicant's management. For these reasons, the Police do not consider there to be any appropriate conditions that would make this application acceptable.

In summary, the applicant operated a premises under a now-revoked licence at the same address for 16 years since 2010. Despite going through various DPSs and management teams, the premises continued to suffer from serious crime and disorder. There has been an inability to learn from previous failings, which suggests that the problems are ingrained in the applicant's approach to management. The Police believe that there is a real risk that the licensing objectives would be undermined and respectfully asks that this application is refused.

Kind regards

[redacted] **Licensing officer**

Central Licensing Sector 4

Central South BCU **Southwark-Lambeth Licensing Team**

Metropolitan Police Service

Southwark Police Station, 323 Borough High St, SE1 1JL

www.met.police.uk [redacted]
MPSLicensingSector4@met.police.uk

MAL/7

MD/902

Incident Archive URL
https://lvufy.sov.mps/onlinearchive/#/home?incDate=20260201&incNumber=902

Date Time 01/02/2026 02:39:07

Location 319 CAMBERWELL ROAD SE5

Opening 001- Violence against the person

MD/1072

Incident Archive URL
https://lvufy.sov.mps/onlinearchive/#/home?incDate=20251227&incNumber=1072

Date Time 27/12/2025 05:07:31

Location O/S THE PLANET NOLLYWOOD, **319 CAMBERWELL ROAD**, **SE5**

Opening Code 001 - Violence Against The Person

MD/1353

Incident Archive URL https://lvufy.sov.mps/onlinearchive/#/home?incDate=20251108&incNu

Date Time 08/11/2025 05:13:46

Location **319 CAMBERWELL ROAD**, **SE5**:NOLLYWOOD

MD/50

MAL/7

Incident Archive URL	https://lvufy.sov.mps/onlinearchive/#/home?incDate=20251014&incNum
Date Time	14/10/2025 00:09:00
Location	**319 CAMBERWELL ROAD**, **SE5**:Planet Nollywood
Opening Code	507 - Contact Record
	001 - Violence Against The Person

MD/5

Incident Archive URL	https://lvufy.sov.mps/onlinearchive/#/home?incDate=20251014&incNur
Date Time	14/10/2025 00:01:20
Location	**319 CAMBERWELL ROAD**, **SE5**:Planet Nollywood
Opening Code	001 - Violence Against The Person
	633 - Knife / Bladed Article

MD/1027

Incident Archive URL	https://lvufy.sov.mps/onlinearchive/#/home?incDate=20250928&incNumbe
Date Time	28/09/2025 03:22:43
Location	**319 CAMBERWELL ROAD**, **SE5**:NOLLYWOOD
Opening Code	001 - Violence Against The Person

MD/99

Incident Archive URL	https://lvufy.sov.mps/onlinearchive/#/home?incDate=20250829&incNum
Date Time	29/08/2025 00:19:05
Location	(7@MS)THE PLANET NOLLYWOOD, **319 CAMBERWELL ROAD**, **SE5**

MAL/7

Opening Code	314 - Suspicious Circumstances

MD/206

Incident Archive URL	https://lvufy.sov.mps/onlinearchive/#/home?incDate=20250822&incNumb
Date Time	22/08/2025 00:30:30
Location	(2261AS) THE PLANET NOLLYWOOD, **319 CAMBERWELL ROAD**, **SE5**
Opening Code	001 - Violence Against The Person

MD/808

Incident Archive URL	https://lvufy.sov.mps/onlinearchive/#/home?incDate=20250811&incNumb
Date Time	11/08/2025 03:12:35
Location	THE PLANET NOLLYWOOD, **319 CAMBERWELL ROAD**, **SE5**
Opening Code	001 - Violence Against The Person

MD/717

Incident Archive URL	https://lvufy.sov.mps/onlinearchive/#/home?incDate=20250811&incNumb
Date Time	11/08/2025 02:42:38
Location	OPP THE PLANET NOLLYWOOD, **319 CAMBERWELL ROAD**, **SE5**
Opening Code	215 - ASB - Nuisance
	202 - Rowdy Or Inconsiderate Behaviour
	601 - Drugs Related

MD/1360

Incident Archive URL	https://lvufy.sov.mps/onlinearchive/#/home?incDate=20250202&incNumbe

MAL/7

Date Time 02/02/2025 05:28:19

Location **319 CAMBERWELL ROAD**, **SE5**: SALSA CITY

Opening Code 503 - Police Generated Resource Activity

MD/410

Incident Archive URL https://lvufy.sov.mps/onlinearchive/#/home?incDate=20241231&incNumber=

Date Time 31/12/2024 01:29:21

Location **319 CAMBERWELL ROAD**, **SE5**:Planet Nollywood

Opening Code 001 - Violence Against The Person

MD/901

Incident Archive URL https://lvufy.sov.mps/onlinearchive/#/home?incDate=20240812&incNumb

Date Time 12/08/2024 04:29:18

Location THE PLANET NOLLYWOOD, **319 CAMBERWELL ROAD**, **SE5**

Opening Code 001 - Violence Against The Person

MD/1260

Incident Archive URL https://lvufy.sov.mps/onlinearchive/#/home?incDate=20230806&incNumber=12

Date Time 06/08/2023 04:14:55

Location **319 CAMBERWELL ROAD**, **SE5**:Planet Nollywood

MD/1199

Incident Archive URL https://lvufy.sov.mps/onlinearchive/#/home?incDate=20230806&incNumbe

Date Time 06/08/2023 03:53:57

Location **319 CAMBERWELL ROAD**, **SE5**:Planet Nollywood

Opening Code 314 - Suspicious Circumstances

MD/5876

Incident Archive URL https://lvufy.sov.mps/onlinearchive/#/home?incDate=20230603&incNumbe

Date Time 03/06/2023 18:45:12

MAL/7

Location	(ASB) PLANET NOLLYWOOD, **319 CAMBERWELL ROAD**, **SE5**
Opening Code	215 - ASB - Nuisance
	202 - Rowdy Or Inconsiderate Behaviour

MD/5650

Incident Archive URL	https://lvufy.sov.mps/onlinearchive/#/home?incDate=20230603&incNumbe
Date Time	03/06/2023 18:15:31
Location	PLANET NOLLYWOOD, **319 CAMBERWELL ROAD**, **SE5**
Opening Code	215 - ASB - Nuisance
	202 - Rowdy Or Inconsiderate Behaviour
	601 - Drugs Related

MAL/7 (revised) – Summary of CAD reports relating to premises

Summary of CAD 902 / **0239hrs** **01/02/26** **Security monitoring office call**	'the security at venue Mollyweood is being attacked' 'the caller is from a monitoring company, staff are on the phone to him describing'. Number of persons hospitalised with serious cuts /slashes from glassware being used as weapons. 5/6 Patrons arrested
Crime report reference (if available)	Cad linked to crime reports 01/7117104/26 01/7121253/26
Connection to the premises	Incident took place inside premises
Outcome	Males arrested await Crown Court hearing

Summary of CAD 1072 **Security call** **27/12/25** **0507hrs**	INFT A MASS FIGHT HAPPENING HAPPENING - UNSURE HOW MANY PEOPLE WE HAVE A SECUIRTY ON SIGHT AND POSSIBLE TRAVELLERS INFT SAID IT WAS HAPPENING OUTSIDE OF THE VENUE INFT HAS SAID THAT THEY DONT NEED POLICE NOW AS EVERYTHING
Crime report reference (if available)	No crime report
Connection to the premises	Reported by security
Outcome	Police request cancelled

Summary of CAD 1353 **0513hrs** **08/11/25** **Unknown caller**	'SECURITY GUARD IS BEING ATTACKED' 'INFT NOT RESPONDING. LOTS OF YELLING FROM MULTIPLE PEOPLE'
Crime report reference (if available)	Cad Linked to crime report 01/8182011/25
Connection to the premises	Incident took place outside on entry to the premises
Outcome	Two males arrested NFA due to poor cctv and victim not engaging with police

Summary of CAD 5/50 **0001hrs** **14/10/25** **Security call**	'Man has tried to fight us he has a knife' 'Male being detained inside and their friends are trying to get in ' Two males arrested
Crime report reference (if available)	Cad linked to Crime report 01/8082090/25 - 01/8082090/25
Connection to the premises	Incident took place at entrance to the premises etc.
Outcome	Assault on security closed due to victim not wishing to pursue prosecution. Suspect charged with possession of knife and assault on police

Summary of CAD 1027 **0322hrs** **28/09/25** **Security Call**	'WE ARE DOOR STAFF AT A VENUE - SOME MEN WE HAVE EJECTED THAT HAVE BEEN BEING A NUISANCE TO WOMEN - ONE OF THEM HAS ASSAULTED ONE OF MY COLLEAGUES ONE OF THEM IS O/S THREATENING TO SHOOT US IN THE HEAD '

Crime report reference (if available)	No Crime report
Connection to the premises	Door staff ejecting patrons for causing nuisance
Outcome	No crime report

Summary of CAD 99 **0019hrs** **29/08/25** **Security Call**	'There is a man with a knife he is being aggressive' Male arrested found in possession of cannabis
Crime report reference (if available)	Linked to crime report 01/7910308/25
Connection to the premises	Patron attempting entry
Outcome	Male charged offensive weapon Possession of drugs-community resolution

Summary of CAD 206 **22/08/25** **0030hrs** **Security call**	INFT I AM SECURITY AT THE NIGHT CLUB, THE M GOT VERY AGGRESSIVE MALE HERE AND HE IS BEING DETAINED

Crime report reference (if available)	Linked to crime report 01/7883567/25
Connection to the premises	Assault occurred inside venue
Outcome	Victim unwilling to pursue

Summary of CAD 808 **11/08/2025** **1312hrs** **Victim call**	ENTERED BY: CHS (c748594) AT: 2025-08-11 03:13:41 ^INFT ME AND MY FRIEND HAS BEEN PHYSICALLY ATTACKED BY A CUSTOMER HAS BEEN DETAINED SHE HAS BEEN HITTING PEOPLE BUT HAS CALMED DOW A LITTLE
Crime report reference (if available)	Linked to crime report 01/7841979/25
Connection to the premises	Assault occurred inside venue
Outcome	Suspect charged

Summary of CAD 410 **0129hrs** **31/12/2024** **Security Call**	'Suspect found with knife, detained by security' 'Was found during search' When searched by Police found in possession of cannabis Male arrested .
Crime report reference (if available)	Cad Linked to crime report 01/1258604/24
Connection to the premises	Patron attempting entry
Outcome	Knife not lockable and below 3 inch NFA

	Possession of cannabis -Community resolution

Summary of CAD 1260 linked to CAD1199 **0414hrs** **06/08/23** **Unknown caller**	Informant states that her boyfriend has been attacked and robbed by a group of south American males coming out of the club
Crime report reference (if available)	Linked to crime report 3025355/23 allegation assault by door staff and counter allegation of assault on door staff 3025356/23
Connection to the premises	Patron wishing to wait in lobby that leads to street
Outcome	Closed victims not wish to pursue prosecution

Intel report 68363 18/05/2023

[redacted]), [redacted] and [redacted] of The Bike bar, 319 CAMBERWELL ROAD LONDON SE5

0HQ , are selling class A drugs.

The drugs are stored at home (as given).

The activity is believed to be a county lines operation from Colombia.

There is social media contacts: [redacted], [redacted] and [redacted] (as given).

There is mention of a big Colombian party Friday the 19th of May.

There is CCTV at the address, it's a night club.

They are all described as Colombians.

Intel Report 68390 Drug supply 19/05/2023

[redacted] & [redacted] are illegally working and selling drugs at a Latin club on

Fridays and weekends. 319 CAMBERWELL, LONDON, SE50HQ & 190 OLD KENT ROAD, SE15TY.

Intel report 7867 Disorder 29/04/2023 0145hrs

On Saturday 29th April 2023 police have been called to **Nollywood** nightclub, 319 CAMBERWELL ROAD SE5 at 01:45hrs by staff stating persons outside the venue had been trying to rush the door and the staff in the venue were struggling in the venue. Officers have arrived on scene and been met by a crowd who have all been intoxicated and queing outside the venue. The staff inside the venue have stated how they had six security on and were struggling with people pushing outside the venue. Officers have spoken with a number of different promters and managers but when asked where the main manager was the staff have not appeared to know their whereabouts. Officers on scene have made the decision to close the venue to prevent any further issues inside and with the staff struggling to manage the person in the club it was officers fear there could be possible serious issues. The persons outside the venue have become upset how they have paid around £25 to get into

the venue and it was being closed. The venue has been very unorganised and lacked any leadership inside the venue. INSP James has put in a section 35 in place outside the venue.

CRIS MD/3025355/23 ABH 06/08/2023 0414hrs

[redacted] and [redacted] are partners who were on a night out at THE PLANET NOLLYWOOD, 319 CAMBERWELL ROAD SE5. [redacted] is security at THE venue.

[redacted] has called police stating that [redacted] has been attacked and that he is unconscious. On arrival, officers saw [redacted] outside the entrance to the club, leaning against [redacted]' leg. He did not appear to be unconscious/knocked-out - more very drunk/incapable. [redacted] herself stated that the little finger on her right hand was broken. LAS arrived shortly after police - callsign Q340.

[redacted] was the one to give the allegation of what happened: that the staff in the venue had told her she cannot wait by the entrance of the club on the interior side. However, there was another female who was standing in the same area but was not told anything. [redacted] stated that when she complained about this, the security staff put hands on her to eject her. At this point, [redacted] intervened on behalf of his partner and [redacted] stated that the security staff all attacked him. Officers also went to speak with the security staff, from which the counter-allegation has been received.

Speaking with the paramedics, they stated that [redacted] may have been knocked unconscious but the state he was in could just as well be the effects of the alcohol, as he confirmed he had drunk several pints. Paramedics stated that, at worst, he may have suffered a mild concussion, but he was not exhibiting symptoms of a concussion. As for [redacted] finger, paramedics stated that it was not broken, but sprained.

[redacted] and [redacted] were conveyed to KCH. Officers did not accompany them. Both parties were quite intoxicated therefore statements could not be taken - and their medical treatment took priority in any case.

[redacted] was advised that there have been counter-allegations made by the security staff at the venue, and that police will investigate the incident and be in contact once all the evidence has been reviewed. Due to their intoxication and circumstances of the incident, clarifying the victims' wishes was not possible, so this will also have to be done.

High intoxication

CRIS MD/3037353/23 12/11/2023 0400hrs

[redacted] came into Brixton Front Office on 14/11/23 at approximately 17:35hrs, to make a report of common assault. This assault took place outside **The Planet Nollywood** nightclub. 319 Camberwell Road, LONDON, SE5 0HQ, on at 04:00hrs on 12/11/23.

VIW and his cousin VW went into the nightclub at approximately 23:30hrs and came out of the nightclub at approximately 04:00hrs.

When they came out of the nightclub, approximately 20 males, IC3 and IC1, possibly from a gang, were standing in a group outside the club.

For no obvious reason without saying anything, 3 IC3 males from the group came over to VIW and started to punch and kick him (Video evidence provided), the VIW was on the ground, a couple of times while being punched and kicked but managed to get up. the attack lasted approximately 2-5 minutes.

VIW got up and ran, then saw someone he knows further up the road who walked with him to McDonalds.

A number of the other males had also been punching and kicking the VIW cousin VW, but he managed to get away before the VIW and headed to McDonalds, he rang VIW to tell him where he was.

VIW meet his cousin VW, and someone must have called the police as they went into McDonalds and spoke to them. No record of a report found.

They were in McDonalds for around 20/30 minutes, and got the bus home around 04:30hrs.

An unknown person filmed what had happened on their mobile phone, and then sent the footage of what happened to the VIW cousin, who then passed it onto VIW who brought it into the Brixton police station.

the males were not seen in **the** club beforehand.

No reply from venue regarding cctv requests

CRIS MD/3020188/23 03/09/2023 0450hrs

[redacted] has reported that the suspect attended the table and distracted [redacted] sister to steal her bags. [redacted] has noted that there is CCTv at the location and this would require additional information to assist. Due to the above information and their being CCTV, I will be screening this report in.

Cctv did not cover incident

01/821710/24 Abh 18/09/2024 0320hrs - 0400hrs

I was sat at the table in the club looking at my phone near the DJ booth. Before i could look up a woman ran towards me and started pulling my hair and started beating my back. My friends came and tried to pull her off me and so did other people in the club. If they weren?t there the situation could have ended differently. When they succeeded in pulling her off me

she immediately left the place. This is a woman who i am aware of and has contacted me and my friends on multiple occasions in a non threatening way but still making her presence known.

I have reviewed this footage and a confrontation is evident in the top right of the screen but with the interference of the lights and the distance from the camera it is not clear what exactly is happening and who is involved. It is not suitable for identification purposes.

01/881199/24 Theft 23/09/2024 report states early hours

Wallet stolen out of bag in venue

01/1039706/24 Theft 02/11/2024 0200hrs

I was in a club and someone stole my phone and took my pin. I reported it to security and got my phone back but when I logged into my mobile banking I saw that they made transactions through Apple Pay.

01/1258604/24 31/12/2024 0200hrs possession of offensive weapon/possession cannabis

Sia searched male and found him to be in possession of knife , police called further searched and found in possession of cannabis.

01/7560445/25 Assault 05/10/2025 0145hrs

INFT we were at a club with my family, they were very rude with us, they threw us out, they threw my brother away, they didn't give my bag and things. They treated us like dogs. INFT They picked us up and threw us out, we bought tickets, they said that 1 of my brothers misbehaved, they are lying, they pushed him outside, they were hitting him. This black guy pushed me and threw me outside the location without my phone or my things. I told him I will call the police. This blond guy from security grabbed my bag. Two security guards, one black male and one blond male. Black male in his 30s, Blond one between 35-40 years old. Both wearing black clothing.

Viw intoxicated

01/7841979/25 assualtt 11/08/2025 0312hrs

Female ejected from venue by security allowed to re enter to find phone , when security asked female to unlock phone she became agitated and during ejection bit a member of staff

Female intoxicated

01/7883567/25 22/08/2025 Disorder 0038hrs

Plain clothes officers flagged down by door staff who were attempting to detain intoxicated male who was being aggressive .

01/7910308/25 possession of offensive weapon 29/08/2025 00:05

This is a case of possession of a pointed and bladed article. The suspect has tried to enter a nightclub with a knife in his bag. Security searched him and found it. Police were called and the suspect arrested.

01/8082090/25 possession of offensive weapon 14/10/2025 00:01

Door staff assaulted following finding suspect in possession of a knife and detained for police . Police attended arrested male . Cctv unavailable as manager on holiday

01/8182011/25 Assault 08/11/2025 05:13

Large group of males fighting security outside venue .

Cctv poor quality only 1 sia willing to make statement

01/8209206/25 Theft 15/11/2025 03:50

Theft of i-pods from venue .

Area not covered by cctv

Intel Report 2930/26 18/02/2026 Drugs supply

[redacted], female, aged 25 to 34 years old, is a Colombian national (COL) who is
currently in the UK.
Parties are held at 319, Camberwell Road, SE50HQ many illegal people attend and some will be
working there, and there will class A drugs being sold.
[redacted] has Indefinite Leave in the U.K which was gained through a false marriage.
[redacted] has illegally bought her brother [redacted] to London who is staying with her and
her partner.
[redacted] has another brother [redacted] who is also in London as a student but he
works lots of hours during the week.
[redacted] owns a barber shop in Elephant and Castle with the postcode SE1[redacted].
[redacted] phone number for bookings is [redacted] and he also operates via

WhatsApp. He
speaks Spanish and not English.

01/7121253/26 01/02/2026 0237hrs

This is a multi-victim stabbing whereby there has been an altercation in the upstairs room of the venue. This altercation has lead to a fight where it is suspected broken bottles have been used and five different individuals have been slashed and cut to different degrees of injury

MAL/8 (revised) – Summary of crime reports and intelligence reports relating to premises

Summary of crime report **3025355/23 linked 3025356/23** **06/08/2023** **0414hrs**	The staff in the venue had told victim she cannot wait by the entrance of the club on the interior side. However, there was another female who was standing in the same area but was not told anything. Xxxx stated that when she complained about this, the security staff put hands on her to eject her. At this point, xxxx xxxxxx intervened on behalf of his partner and xxxxstated that the security staff all attacked him. Officers also went to speak with the security staff, from which the counter-allegation has been received from security
Crime report reference (if available)	3025355/23 linked to 3025356/23 Cad 1260
Connection to the premises	Patrons of venue altercation in venue
Outcome	Closed victims not wish to pursue prosecution

Summary of crime report **3037353/23** **12/11/2023** **0400HRS**	VIW and his cousin VW went into the nightclub at approximately 23:30hrs and came out of the nightclub at approximately 04:00hrs. When they came out of the nightclub, approximately 20 males, IC3 and IC1, possibly from a gang, were standing in a group outside the club. For no obvious reason without saying anything, 3 IC3 males from the group came over to VIW and started to punch and kick him
Crime report reference (if available)	ABH - 3037353/23 No Cad reported at Police station
Connection to the premises	Patrons of the venue
Outcome	Cctv provided by Southwark council was poor quality due to being an old camera and poor lighting. Premises were unresponsive to CCTV requests. Venue visited by Police but all closed. victim uncontactable

Summary of crime report **3020188/23-should read-3028561/23** **0350hrs** **03/09/23**	MALE CAME TO THE TABLE AND SAYING HE HAD LOST A TOY. AFTER THIS THE BAGS WERE MISSING
Crime report reference (if available)	Theft - 3020188/23-should read-3028561/23 No Cad
Connection to the premises	Patrons inside venue
Outcome	Closed due to cctv not covering area

Summary of crime report **01/821710/24** **09/09/2024** **0320hrs**	Victim was sat at the table in the club looking at my phone near the DJ booth. Before i could look up a woman ran towards me and started pulling my hair and started beating my back. My friends came and tried to pull her off me and so did other people in the club. If they weren?t there the situation could have ended differently. When they succeeded in pulling her off me she immediately left the place.
Crime report reference	Common assault-01/821710/24 No Cad reported on line
Connection to the premises	Patron assaulted inside venue
Outcome	Closed cctv no clear images of suspect or assault

Summary of crime report	Victim had wallet stolen from bag whilst in club

01/881199/24 **23/09/2024** **0200-0300**	
Crime report reference	Theft-01/881199/24 No Cad reported on line
Connection to the premises	Patron in venue
Outcome	Closed not able to identify suspect

Summary of crime report **01/1039706/24** **02/11/2024** **0130hrs**	Victim had his phone stolen by an unknown suspect. When the victim then reported this to security at the venue where theft occurred the victim managed to recover his phone. Suspects did however manage to get into the phone and male online purchases through Apple pay. No mention of threats, violence or injury.
Crime report reference (if available)	Theft -01/1039706/24
Connection to the premises	Patron inside venue
Outcome	Closed due to victim unwilling to pursue

Summary of crime report **01/1258604/24** **31/12/2024** **0129hrs**	Officers were called by security of the club called the BIKE BAR, 319 Camberwell Road, SE5 where they had a male detained in handcuffs after searching him on entry, during which the security guard has detained the male and brought him inside in which while placing in cuffs the male has giving some resistance. While this male was placed in handcuffs the security guard has pulled out a black flip knife from the male's waist band and called police. Officers have arrived and PC has

Crime report reference (if available)	01/1258604/24 Cad-410
Connection to the premises	Patron attempting entry
Outcome	Knife not lockable and below 3 inch NFA Possession of cannabis -Community resolution

Summary of crime report **01/7560445/25** **01/06/2025**	we were at a club with my family, they were very rude with us, they threw us out, they threw my brother away, they didn't give my bag and things. They treated us like dogs They picked us up and threw us out, we bought tickets, they said that 1 of my brothers misbehaved, they are lying, they pushed him outside, they were hitting him. This black guy pushed me and threw me outside the location without my phone or my things. I told him I will call the police. This blond guy from security grabbed my bag.
Crime report reference	01/7560445/25
Connection to the premises	Patron attempting entry
Outcome	Closed victim not engaging

Summary of crime report **01/7841979/25** **11/08/2025**	Drunk female has assaulted two security officers at THE PLANTE NOLLYWOOD, SE5, causing ABH injuries
Crime report reference	Common assault -01/7841979/25

	Cad 808
Connection to the premises	Patron of the premises
Outcome	Suspect charged

Summary of crime report **01/7883567/25** **22/08/2025** **0030hrs**	Plain clothes officers 1211MF and 103MF have been flagged down by security at NIGHTCLUB following altercation with suspect where a security guard has been assaulted. Officers have helped detain and handcuff the suspect before making a request for local officers to attend and assist. Officers , and have assisted with detaining the suspect who appeared to be distressed and intoxicated. LEG restraints have also been used prior to the arrival of AS22N onto the scene. Security were not interested in pursuing any investigation into the matter so the male has been uncuffed and allowed to head home
Crime report reference	Crime report 01/7883567/25 Cad 206
Connection to the premises	Patron of the premises
Outcome	Suspect charged

Summary of crime report **01/7910308/25** **29/08/2025** **0019hrs**	Male searched upon entry to club by security. Upon searching, a wooden kitchen knife was found in his cross body bag. Upon arrest, TWO small snaps of suspected COCAINE and ONE small wrap of HASH.
Crime report reference (if available)	01/7910308/25 Cad 99

Connection to the premises	Patron attempting entry
Outcome	Charge possession of offensive weapon Possession of cannabis – NFA

Summary of crime report **01/8082090/25 linked** **01/8082279/25** **14/10/25** **0001HRS**	When speaking with [redacted] and [redacted], they stated that prior to this incident they were working as the door staff at PLANET NOLLYWOOD in which it is routine to search each customer as they enter the venue to ensure they have no prohibited items on them; when searching [redacted] they have felt what they believed to be a knife in their waistband. They did not want to initially alert [redacted] that they were aware of this, in which they were able to usher [redacted] in to a sterile area and place handcuffs on [redacted]. [redacted] has then began to resist from the security and complained that the handcuffs were hurting them; the security have made an attempt to loosen the handcuffs, and when doing so [redacted] has bitten [redacted] on their mid-torso, causing injuries amounting to ABH. Suspect further assaulted emergency worker
Crime report reference (if available)	ABH-01/8082090/25 linked to 01/8082279/25 Cad 05/50
Connection to the premises	Patron searched at entrance to venue
Outcome	Assault on security closed due to victim not wishing to pursue prosecution. Suspect charged with possession of knife and assault on emergency worker

Summary of crime report **01/8182011/25** **08/11/2025** **0513hrs**	As AS71N arrived the security were actively restraining two individuals. Myself and AS1181 assisted the security in restraining the individual that was resisting the most aggressively. He was placed in a rear stack and was arrested on suspicion of common assault. At this point more officers had arrived Due to the crowd that was gathering around the venue it was decided that the suspects should be removed from the venue quickly.

	The members of security were spoken to and only one was willing to attend court and give a statement
Crime report reference	Disorder/assault 01/8182011/25 Cad 1353
Connection to the premises	Patron attempting entry
Outcome	Two males arrested NFA due to poor cctv and victim not engaging with police

Summary of crime report **01/8209206/25** **15/11/2025** **0350hrs**	Victim states ‘ MY HEADPHONES WERE ON A CHAIR AND MY COAT WAS COVERING THEM. WHEN I WENT TO GET THEM THEY WERE NOT THERE. THIS COULD HAVE HAPPENED ANY TIME AFTER 3:50AM
Crime report reference (if available)	Theft -01/8209206/25 No Cad online report
Connection to the premises	Patron inside venue
Outcome	Closed unable to identify suspect or offence

Summary of crime report **01/7121253/26 linked** **01/7117104/26** **01/02/2026** **0237 hours**	This is a multi-victim stabbing whereby there has been an altercation in the upstairs room of the venue. This altercation has lead to a fight where it is suspected broken bottles have been used and five different individuals have been slashed and cut to different degrees of injury.
Crime report reference	01/7121253/26 01/7117104/26

	Cad 902
Connection to the premises	Patrons of the premises
Outcome	Suspects charged

Summary of Intel report **MDRT00767867** **29/04/2023**	On Saturday 29th April 2023 police have been called to **Nollywood** nightclub, 319 CAMBERWELL ROAD SE5 at 01:45hrs by staff stating persons outside the venue had been trying to rush the door and the staff in the venue were struggling in the venue. Officers have arrived on scene and been met by a crowd who have all been intoxicated and queuing outside the venue. The staff inside the venue have stated how they had six security on and were struggling with people pushing outside the venue. Officers have spoken with a number of different promoters and managers but when asked where the main manager was the staff have not appeared to know their whereabouts. Officers on scene have made the decision to close the venue to prevent any further issues inside and with the staff struggling to manage the person in the club it was officers fear there could be possible serious issues. The persons outside the venue have become upset how they have paid around £25 to get into the venue and it was being closed. The venue has been very unorganised and lacked any leadership inside the venue. INSP xxxx has put in a section 35 in place outside the venue.
Crime report reference	No crime report
Connection to the premises	Disorder
Outcome	Section 35 dispersal order

Summary of Intel report **MDRT00768363** **18/05/2023**	xxxxxxxx, xxxxxxx and xxxxxxxxx of The Bike bar, 319 CAMBERWELL ROAD LONDON SE5 0HQ , are selling class A drugs. The drugs are stored at home (as given). The activity is believed to be a county lines operation from Colombia.

	There is social media contacts: xxxxxx, xxxxxxx and xxxxxx. There is mention of a big Colombian party Friday the 19th of May. There is CCTV at the address, it's a night club. They are all described as Colombians.
Crime report reference	No crime report
Connection to the premises	Allegation drug supply inside venue
Outcome	Disseminated to local drugs team

Summary of Intel report **MDRT00768390** **19/05/2023**	xxxxxxx & xxxxxxx are illegally working and selling drugs at a Latin club on Fridays and weekends. 319 CAMBERWELL, LONDON, SE50HQ & 190 OLD KENT ROAD, SE15TY. Intel report
Crime report reference	No crime report
Connection to the premises	Allegation drug supply inside venue
Outcome	Disseminated to local drugs team

Summary of Intel report **01/606/2930/26** **18/02/2026**	xxxxxxx, female, aged 25 to 34 years old, is a Colombian national (COL) who is currently in the UK. Parties are held at 319, Camberwell Road, SE50HQ many illegal people attend and some will be working there, and there will class A drugs being sold. xxxxxxx has Indefinite Leave in the U.K which was gained through a false marriage. has illegally bought her brother [redacted] to London who is staying with her and her partner.

	has another brother who is also in London as a student but he works lots of hours during the week. owns a barber shop in Elephant and Castle with the postcode SE1 F. phone number for bookings is [redacted] and he also operates via whatapp. He speaks Spanish and not English
Crime report reference	No crime report
Connection to the premises	
Outcome	Disseminated to local drugs team

From: [redacted]
To: Allday, Debra; Tear, Jayne
Subject: SE5 Lounge, 319 Camberwell Road, London, SE5 0HQ - Mark Lynch additional Police Representation
Date: 03 September 2026 10:04:37
Attachments: SE5 Lounge additional statement.docx
MAL1 NOD_Redacted.pdf
MAL 2 CCTV breach_Redacted.pdf
MAL3 COVID VISIT REDACTED.pdf
MAL 4 Covid revisit redacted.pdf
MAL 5 NOD 2023 redacted .pdf
MAL 6 NOD DISORDER.pdf
MAL 7 cads redacted.docx
MAL 8 Crime reports redacted.pdf
Original Police Rep SE5 Lounge.pdf

Dear Deborah and Jane,

We act for Adekunle Adejumo, the applicant for the grant of a premises licence in respect of the above premises.

We write concerning the further document submitted by Mark Lynch on behalf of the police, which is described as an additional representation. We request that the Licensing Authority decline to accept or receive that document as a relevant representation and exclude it from the material placed before the Licensing Sub-Committee.

The police's representation made within the statutory 28-day period was the representation submitted by Tom Cooke. Mark Lynch's later document is materially different from that original representation. It is not merely an amplification, clarification or further explanation of a ground raised in time. It introduces new allegations, factual matters and details which were not advanced by Tom Cooke within the statutory representation period. The distinction is substantive, not merely one of wording, elaboration or presentation.

The proper comparison is therefore between:

1. the grounds, facts and matters actually raised in Tom Cooke's representation before the deadline; and
2. the additional grounds, allegations, factual details and evidential matters first raised in Mark Lynch's later document.

A party may expand upon a representation validly made, but expansion cannot properly be used to introduce a new representation after the statutory period has expired. Describing the later document as an "additional representation" is itself consistent with its true character. It is additional to, rather than an amplification of, the representation made in time.

The statutory scheme provides a defined period of 28 consecutive days for representations concerning an application for the grant of a premises licence. Paragraphs 8.23 and 8.80 to 8.82 of the revised Guidance issued under section 182 of the Licensing Act 2003 connect the 28-day advertising period with the period during which representations may be made and require the published notice to state the date by which representations are to be received.

Paragraph 9.37 of the Guidance draws an important distinction. A responsible authority may rely upon its written representation and may expand upon that existing representation at the hearing, but it may not add further representations to those disclosed to the applicant before the hearing. The ability to expand does not permit a responsible authority to introduce new grounds, new allegations or materially new factual matters after expiry of the statutory period.

The Licensing Authority should determine admissibility by substance rather than label. The appropriate question is whether Mark Lynch's document merely explains and develops the matters raised by Tom Cooke, or whether it advances a materially different case. The additional contents show that it does the latter.

Acceptance of the later document would permit the police to circumvent the statutory deadline, enlarge their case after the close of consultation and deprive the applicant and the public of the certainty which the prescribed period is intended to provide. It would also place the applicant at a procedural disadvantage by requiring an answer to a case that was not made during the period in which representations could lawfully be submitted.

The applicant does not suggest that every later piece of supporting evidence is necessarily inadmissible. The objection is that Mark Lynch's document goes beyond evidence supporting the representation made by Tom Cooke. It advances matters which were not alleged or relied upon in the original representation and thereby seeks to introduce a new and additional representation out of time.

We therefore request that the Licensing Authority:

1. undertake a side-by-side comparison of Tom Cooke's original representation and Mark Lynch's additional representation;
2. identify each ground, allegation and material factual detail appearing for the first time in Mark Lynch's document;
3. determine that those matters are not an amplification of the original representation but constitute a new representation made outside the statutory period;
4. exclude Mark Lynch's additional representation and any new matters contained within it from consideration;
5. ensure that the Sub-Committee receives only the representation validly made within the 28-day period, together with any material that genuinely supports or amplifies the grounds contained in that representation; and
6. provide the applicant with a written decision and full reasons before the hearing.

If the Licensing Authority considers that Mark Lynch's document may nevertheless be accepted, please identify:

1. the precise statutory or regulatory power relied upon;
2. each passage said to amount only to amplification and the passage in Tom Thomas's representation which it is said to amplify;
3. the basis upon which any new allegation or factual matter is said not to constitute a fresh representation;
4. the identity and delegated authority of the person determining admissibility; and
5. the steps proposed to protect the applicant from procedural unfairness.

For the avoidance of doubt, the applicant does not consent to admission of the additional representation merely because its substance may be addressed protectively. The applicant reserves all rights in relation to admissibility, procedural fairness, relevance and weight, including the right to make further submissions once the Licensing Authority has identified its legal basis and reasons.

Pending determination of this objection, Mark Lynch's additional representation should not be treated as an admitted relevant representation or placed before the Sub-Committee without a clear direction

that its admissibility is disputed and remains to be determined.

We should be grateful for an urgent substantive response.

Kind regards

[redacted] **on behalf of David Dadds**
Dadds LLP Licensing Solicitors
Crescent House, 51 High St, Billericay, Essex CM12 9AX
T 01277 631 811 **DX** 32202 BILLERICAY
[redacted]
W www.dadds.co.uk
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Please note my non-working day is a Wednesday. My working pattern is 9am to 5pm Monday, Tuesday, Thursday and Friday. I will not have access to my emails.



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From: Allday, Debra
To: David Dadds; [redacted]
Cc: Tear, Jayne
Bcc: Lynch Mark A - AS-CU
Subject: FW: SE5 Lounge, 319 Camberwell Road, London, SE5 0HQ - Mark Lynch additional Police Representation
Date: 04 September 2026 13:18:00

Dear David

Thank you for your email of 3 September raising concerns of Mark Lynch's additional evidence.

The evidence provided by PC Lynch is I understand, supporting evidence to Tom Cooke's representation of 11 May 2026 and should be treated as such.

Having reviewed each of the documents you provided my **provisional view** is that neither the supporting letter/statement (attached to your email as "SE5 Lounge additional statement") nor the documents MAL/1-MAL/8 introduce new grounds. PC Cooke's original email clearly states that the Application undermines the crime and disorder licensing objective. It further provides that the proposal for the premises licence is likely to undermine the crime and disorder and public safety licensing objectives. The further supporting evidence is permitted as you well know, under Reg. 16 of the 2005 Hearing Regs and is regularly utilised by all parties.

The documents MAL/1-MAL/8 evidence the licensing objectives identified as *potentially* being undermined.

You will be aware that the Agenda for the LSC has been published and the number of people that have had sight of it can't be calculated. In the circumstances, it is my view that for transparency reasons, it is right and proper you make a legal submission at the LSC next week as a preliminary issue, so Members may make the necessary decision. Detailed written reasons will be provided as part of the final Notice of Decision.

If Members choose to accept your submission and exclude the evidence, then Members will be directed to disregard it and ensure it not form part of their overall decision.

I ask that any legal arguments you intend to raise, either in respect of PC Lynch's supporting evidence or the application generally, are submitted in writing as your earlier convenience.

Kind regards

Debra Allday
Senior Solicitor - Regulatory Team
London Borough of Southwark - Legal Services
160 Tooley Street
PO Box 64529
London SE1P 5LX
DX: 136147 London Bridge 7
[redacted]
www.southwark.gov.uk

Please note I do not work Wednesdays

From:	David Dadds
To:	Lynch Mark A - AS-CU
Cc:	Allday, Debra
Subject:	RE: [EXTERNAL] SE5 Lounge, 319 Camberwell Road, London, SE5 0HQ - Mark Lynch additional Police Representation
Date:	05 September 2026 16:27:25
Attachments:	image011.png image012.png image014.png image017.png

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5 September 2026

Dear Mark,

Thank you for providing the redacted CAD, crime and intelligence reports, together with the available outcomes. I have now reviewed that material against the incidents relied upon in the additional Police evidence.

I recognise that the Police are entitled to place relevant information before the Licensing Sub-Committee. However, fairness requires the material to be presented accurately and with a proper distinction between an initial report, an allegation, intelligence, a recorded crime, the final outcome, and any demonstrated connection to the management or operation of the premises.

A number of the entries do not appear to have a sufficient causal connection to the premises. Some concern conduct merely at, near or opposite the address; some do not establish that those involved were patrons; some were not crimed or concluded with no offence disclosed; and others resulted in no further action because the evidential threshold was not met, no suspect was identified, the complainant did not engage, or there were no further lines of enquiry.

Where the final outcome is no further action, no offence disclosed, no trace, not crimed, or investigation complete with no suspect identified, that outcome should be stated prominently. Such matters should not be presented in a way which suggests that the allegation was proved, or that an adverse finding was made against the premises, its licence holder, management or staff.

There are also incidents which appear to demonstrate appropriate and responsible action by the premises. These include occasions when security searched customers, discovered and removed weapons, detained individuals, protected staff and patrons, and called or flagged down the Police. Those matters should not be characterised simply as crime attributable to the premises. The management response is directly relevant and, in several instances, demonstrates the preventative arrangements operating as intended.

<u>Specific corrections and withdrawals requested</u>

I. CAD 717: This concerns young people on an unattended bus opposite the premises. It

was not crimed and concluded no trace. There is no demonstrated connection to the premises or its patrons. Please withdraw it.

II. CAD 50: This is expressly recorded as a duplicate and linked to CAD 5. It must not be counted or presented as a separate incident.

III. CAD 1072: This was not crimed and concluded with no offences disclosed. The caller said Police were no longer required, and a passing officer found no fight taking place and all calm. Please withdraw it or record the final outcome clearly.

IV. CAD 901: This was not crimed, with no weapons or injuries recorded, and concluded with no offences disclosed. If reliance is intended, please explain its relevance; otherwise it should be withdrawn.

V. CAD 1360: This was Police-generated resource activity only. Officers were checking for a possible scene and recorded that there was nothing obvious outside the location. It should be withdrawn.

VI. CAD 1199: This was an incomplete and unverified call, was not crimed, and was linked to CAD 1260. It should not be treated as a separate proven allegation against security.

VII. CADs 5650 and 5876: These are linked or repeat reports from the same date. The group had left, the risk was assessed as low, and no crime report followed. They should not be counted as two separate established incidents.

VIII. Crime 01/1258604/24 / CAD 410: The summary "community resolution" is incomplete. The offensive-weapon allegation was dealt with by no further action; the community resolution concerned cannabis. Security discovered the item during an initial search, detained the person and called Police. Please correct the schedule accordingly.

IX. Crime 01/8182011/25 / CAD 1353: The final material records no further action because the evidential threshold was not met. The CCTV was insufficient, there was no corroborating evidence, and the suspects were not charged. That outcome should be stated clearly.

X. CADs 99, 206, 808 and 5: These record security detecting or controlling risk, detaining individuals, assisting Police or being assaulted by customers. They should be described as incidents involving effective security intervention, not as evidence of management failure.

XI. CAD 1260: The material contains competing accounts, an external location, and differing outcomes. One reported victim expressly said that he had not been inside the club. It should not be presented as a single proven incident caused by the premises.

More generally, please confirm that the Police schedule will be revised so that it includes only matters which have a demonstrated and relevant connection to the premises, its patrons or its management, states the final outcome accurately, avoids duplication, and distinguishes allegations and intelligence from established findings.

As a proportionate and fair approach, I also invite the Police to confine any historic material to matters arising since the previous review in 2023. Material predating that review has already formed part of the regulatory history and should not be reintroduced unless the Police identify a specific reason why it remains materially relevant to the present application. Even within that period, mere proximity to the address is insufficient without a proper causal connection.

Please therefore confirm which entries the Police will withdraw, which entries will be corrected, and precisely which remaining matters are relied upon. If the Police maintain reliance on any matter which was not crimed, resulted in no further action, disclosed no offence, or lacks a demonstrated connection to the premises, please identify the evidential basis and the purpose for which it is relied upon.

In the absence of that exercise, the Applicant will submit that placing an undifferentiated body of allegations, raw CAD entries, duplicated matters, closed intelligence and no-further-action reports before the Sub-Committee is liable to create an unfair and highly prejudicial impression. Such material should be excluded or, at the least, afforded no adverse weight particular given the late service of the additional representation and evidence.

I would be grateful for your response and a revised schedule as soon as reasonably practicable.

Kind regards,

David Dadds, Barrister
Partner
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From: [redacted]
Sent: 05 September 2026 15:45
To: David Dadds <david.dadds@dadds.co.uk>
Cc: [redacted]
Subject: [EXTERNAL] SE5 Lounge, 319 Camberwell Road, London, SE5 0HQ - Mark Lynch additional Police Representation

[EXTERNAL] Beware – This email originated outside Dadds LLP and may be malicious. Please take extra care with any links, attachments, requests to take action or verify your password etc.

Good Afternoon

Thank you for your email and request for further information in regard to the additional evidence submitted .Please find attached redacted prints of the crime reports and intelligence reports , I will send the CAD reports separately so as not to over burden the email .

Crime report
3037353/23-No Cad- Outcome closed due to unable to contact victim and cctv footage unclear.
3025355/23-Cad 1260 -Outcome victim did not wish to pursue.
3020188/23-should read-3028561/23-No Cad -Outcome closed due to cctv not covering incident.
01/8082090/25-Cad 005/50-Outcome suspect charged.
01/8209206/25-No Cad-Outcome closed no cctv or witnesses.
01/1039706/24-No Cad-Outcome unable to contact victim.
01/1258604/24-Cad 410-Outcome community resolution.
01/7910308/25-Cad 99-Outcome Charge possession offensive weapon.
01/8182011/25-Cad 1353-Outcome closed cctv poor quality and no other witnesses.
01/821710/24-No Cad-Outcome closed cctv quality not sufficient to identify suspect. Victim not engaging.
01/7560445/25-No Cad-Outcome closed no cctv ,victim not engaging.
01/881199/24-No Cad-Outcome closed unable contact victim.
01/7841979/25-Cad 808-Outcome suspect charged assault.
01/7121253/26 link 01/7117104/26-Cad 902-Outcome Suspects charged
01/7883567/25-Cad 206-Outcome closed security did not wish to pursue.

I hope this assist you

Kind regards

[redacted]

[redacted] **Licensing officer**
Central Licensing Sector 4
Central South Bcu **Southwark-Lambeth Licensing Team**
Metropolitan Police Service
07721523980
Southwark Police station 323 Borough high St, SE1 1JL
www.met.police.uk [redacted]
Lambeth Southwark

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From: David Dadds
To: Lynch Mark A - AS-CU
Cc: MPSLicensingSector4@met.police.uk; David Dadds; Natasha Nunn; Allday, Debra
Subject: SE5 Lounge / Planet Nollywood – 2011 firearms incident and request for disclosure
Date: 06 September 2026 12:04:30

Dear [redacted]

I write specifically concerning the 2011 incident relied upon in your additional representation. Your statement characterises the incident as one in which "a male carrying two loaded firearms was able to enter the premises unchallenged" and relies upon the resulting review and suspension as part of an asserted history of management failure.

That characterisation is disputed and appears materially incomplete. Our client's instructions are that the individual was not a patron; the premises was not open to the public for licensable activities at the time; only cleaners, sound technicians or other preparatory staff were present; and the individual entered through the garden area while apparently seeking refuge or attempting to evade armed officers who were already pursuing or seeking to arrest him in connection with another matter. Armed officers entered within seconds or minutes and arrested him. Our client further recalls being shown the individual and a Tesco bag containing two handguns, after which the Police took the CCTV recorder.

If those instructions are correct, the relevant distinction is between a person unexpectedly entering closed premises while evading an existing Police operation and an armed patron being admitted unchallenged during operation. The present representation does not disclose that distinction.

Please therefore provide the records necessary to establish the full circumstances, including:

1. the CAD, crime and intelligence references relating to the incident;
2. the time and circumstances in which the individual entered the premises and was arrested;
3. confirmation whether the Police were already seeking, following or pursuing the individual before he entered;
4. the incident or location from which the Police interest arose;
5. confirmation whether the premises was open to the public or carrying on licensable activities at the time;
6. any evidence that the individual was a customer, patron, invitee or otherwise connected with the premises or its management;
7. the route by which the individual entered, including whether entry was through the garden or another non-public access point;
8. the arrest report, custody outcome, charging decision and any subsequent court outcome;
9. the firearms examination or classification, including whether the firearms were loaded and capable of discharge;
10. confirmation whether any firearm was produced, threatened or discharged inside the premises;
11. the statements or notebooks of the armed officers and supervising sergeant;

12. the record of seizure, examination and return or retention of the CCTV recorder and any footage recovered from it; and
13. any finding made in 2011 that the premises, licence holder, management or staff knew of, assisted, permitted or could reasonably have prevented the individual's entry.

Please also identify the precise passages in the 2011 decision upon which the Police rely, rather than the bare fact that the licence was suspended. In particular, please confirm whether the Sub-Committee made any finding that the individual was a patron, that the premises was open for licensed activity, or that management knowingly or negligently admitted him.

Pending production of those records, please confirm that the Police will either withdraw reliance upon the 2011 firearms incident or amend the additional representation so that it does not suggest, without the underlying evidential context, that an armed patron was admitted unchallenged during licensed operation. Given the age of the incident and the hearing listed for next week, reliance upon a compressed and potentially misleading account without the underlying records would be seriously prejudicial and would prevent the Applicant from testing its relevance, accuracy and weight fairly.

Please treat this as an urgent request and provide your response and the relevant records in sufficient time for proper consideration before the hearing.

Kind regards,

David Dadds
Dadds LLP
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From: [redacted]
To: Regen, Licensing
Cc: Tear, Jayne; Allday, Debra; david.dadds@dadds.co.uk
Subject: SE5 Lounge / Planet Nollywood 319 Camberwell road SE5
Date: 08 September 2026 13:33:38
Attachments: image001.png
image002.png
image004.png
image007.png
SE5 CRIME REPORTS AND LINKS MAL8 (revised).docx
SE5 CADS AND LINKS MAL7 (revised).docx

Good Morning

Further to the forthcoming hearing, the Police wish to provide an update regarding recent disclosure and the consequential revisions to exhibits MAL/7 and MAL/8.

On 3 September 2026, the Police received an email from the applicant, Mr Dadds, requesting comprehensive disclosure of Police reports relating to the matters referenced within exhibit MAL/7. It is understood that the Licensing Authority was not copied into this correspondence. In order that the Licensing Authority may appreciate the extent of the disclosure sought, we attach Mr Dadd's email to this update.

In response to that request, the Police disclosed the material sought by the applicant on 5 September 2026, comprising approximately 30 Police reports appropriately redacted.

Following receipt of that material, the applicant responded on the same date, identifying a number of corrections and withdrawals which, in light of the disclosed material, were said to apply to both MAL/7 and MAL/8.

Accordingly, and at the applicant's request, the Police have prepared revised versions of exhibits MAL/7 and MAL/8, which are attached. In particular, within MAL/7, CADs 717, 1360 and 5650/5876 have been withdrawn, and amendments have been made to clarify where multiple CAD references relate to the same incident. The Police suggest that the revised versions of MAL/7 and MAL/8 are relied upon, as they supersede the original versions.

For the avoidance of doubt, the Police emphasise that these revisions do not constitute the introduction of new evidence on the Police's own initiative. The Police's representations do not rely upon the contents of the disclosed Police reports, which have not been submitted by the Police as evidence. Rather, the revisions to MAL/7 and MAL/8 have been made solely in the spirit of cooperation with the applicant and in the interests of assisting the Licensing Authority and facilitating an effective hearing on Thursday. Additionally, if the Sub-Committee would be assisted by having sight of the full suite of Police reports disclosed to the applicant, the Police can provide this.

Separately, a further email was received from Mr Dadds on 6 September 2026 in which the applicant sought extensive disclosure in relation to the 2011 incident triggering the 2011 review. The Licensing Authority was copied into this request. For the purposes of Thursday's hearing, the Police rely upon what is recorded on the face of the 2011 review decisions, which are already contained in the hearing bundle. The Police do not seek to rely upon the primary investigative material relating to that incident. In light of the above, the Police consider the applicant's request for blanket disclosure to be disproportionate and

amounts to an inappropriate ‘fishing expedition’. The applicant’s request is also inconsistent with its own invitation to the Police to disregard historical material pre-dating the 2023 review.

Please place this email, the attached correspondence from Mr Dadds, and the revised exhibits before the Sub-Committee as part of the hearing bundle.

Kind regards

[redacted] **Licensing officer**
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Central South Bcu Southwark-Lambeth Licensing Team
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Southwark Police station 323 Borough high St, SE1 1JL
www.met.police.uk [redacted]
MPSLicensingSector4@met.police.uk
Lambeth **Southwark**

[redacted] **Licensing officer**
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NOTE: Original held by Constitutional Team; all amendments/queries to Andrew Weir - Tel: 020 7525 7222

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Members (Electronic Versions Councillor Jane Salmon (Chair) Councillor Andy Higson Councillor Bill Williams **Reserve** Councillor Selena Gray		**Officers (Electronic Versions – No hard copy unless indicated)** Debra Allday, legal team Toyin Calfos, legal team Charlotte Precious, legal team Jayne Tear, licensing team Raymond Binya, environmental protection team Thomas Cooke, Metropolitan Police Service P.C. Mark Lynch, Metropolitan Police Service Andrew Weir, constitutional team (Copies to Andrew Weir, 2nd Floor, Hub 2, Tooley Street) **Dated** 9 September 2026	