

Licensing Committee

Thursday 29 January 2026

6.00 pm

Ground Floor, 160 Tooley Street, London SE1 2QH

Membership

Councillor Renata Hamvas (Chair)
Councillor Jane Salmon (Vice-Chair)
Councillor Suzanne Abachor
Councillor Sunil Chopra
Councillor Ellie Cumbo
Councillor Dora Dixon-Fyle MBE
Councillor Barrie Hargrove
Councillor Jon Hartley

Councillor Sunny Lambe
Councillor Hamish McCallum
Councillor Margy Newens
Councillor Andy Simmons
Councillor Charlie Smith
Councillor David Watson
Councillor Kath Whittam

INFORMATION FOR MEMBERS OF THE PUBLIC

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Contact

Andrew Weir by email: andrew.weir@southwark.gov.uk

Webpage: <http://www.southwark.gov.uk>

Members of the committee are summoned to attend this meeting

Althea Loderick

Chief Executive

Date: 20 January 2026



Licensing Committee

Thursday 29 January 2026
6.00 pm
Ground Floor, 160 Tooley Street, London SE1 2QH

Order of Business

Item No.	Title	Page No.
	PART A - OPEN BUSINESS	
1.	APOLOGIES To receive any apologies for absence.	
2.	CONFIRMATION OF VOTING MEMBERS A representative of each political group will confirm the voting members of the committee.	
3.	NOTIFICATION OF ANY ITEMS OF BUSINESS WHICH THE CHAIR DEEMS URGENT In special circumstances, an item of business may be added to an agenda within five clear days of the meeting.	
4.	DISCLOSURE OF INTERESTS AND DISPENSATIONS Members to declare any personal interests and dispensation in respect of any item of business to be considered at this meeting.	
5.	MINUTES FROM THE LICENSING COMMITTEE To approve as a correct record the Minutes of the open section of the meeting held on 1 September 2025.	
6.	LICENSING ACT 2003: REVIEW OF STATEMENT OF LICENSING POLICY 2026 TO 2031	1 - 114

Item No.	Title	Page No.
7.	LICENSING ACT 2003: REVIEW OF THE CUMULATIVE IMPACT AREAS IN SOUTHWARK.	115 - 180
8.	LICENSING ACT 2003: REVIEW OF THE LATE-NIGHT LEVY	181 - 211
9.	UPDATE ON RECENT APPEALS AND PROSECUTIONS	Verbal Update

ANY OTHER OPEN BUSINESS AS NOTIFIED AT THE START OF THE MEETING AND ACCEPTED BY THE CHAIR AS URGENT.

EXCLUSION OF PRESS AND PUBLIC

The following motion should be moved, seconded and approved if the sub-committee wishes to exclude the press and public to deal with reports revealing exempt information:

“That the public be excluded from the meeting for the following items of business on the grounds that they involve the likely disclosure of exempt information as defined in paragraphs 1-7, Access to Information Procedure rules of the Constitution.”

PART B - CLOSED BUSINESS

ANY OTHER CLOSED BUSINESS AS NOTIFIED AT THE START OF THE MEETING AND ACCEPTED BY THE CHAIR AS URGENT.

Date: 20 January 2026

Meeting Name:	Licensing Committee
Date:	29 January 2026
Report title:	Licensing Act 2003: Review of Statement of Licensing Policy 2026 to 2031
Ward(s) or groups affected:	All Wards
Classification:	Open
Reason for lateness (if applicable):	Not applicable
From:	Strategic Director of Environment, Sustainability and Leisure

RECOMMENDATIONS

1. That the Licensing Committee:
 - a) Considers and approves Southwark's Statement of Licensing Policy 2026-2031, provided at **Appendix A**.
 - b) Considers whether any further amendments to Southwark's Statement of Licensing Policy 2026-2031 are required following the public consultation.
 - c) That the committee recommend that Council Assembly agree to the publication of the Southwark Statement of Licensing Policy for 2026-2031 (Appendix A).

BACKGROUND INFORMATION

2. The Licensing Act 2003 came into effect on 25 November 2005. The Act introduced a regime for the licensing of alcohol, regulated entertainment and late-night refreshment, to be administered by the local licensing authority
3. Section 5 of the 2003 Act requires each licensing authority to prepare and publish a statement of licensing policy every five years. The policy statement is expected to set out, for the benefit of applicants, responsible authorities and members of the local community, how the authority intends to approach its licensing responsibilities under the Act. Each authority is also required to keep the statement of policy under review throughout its term and make appropriate revisions as necessary.

4. The initial Southwark statement of licensing policy was considered and approved by the full council assembly on 6 December 2004. It was compiled with regards to the provisions of the Act itself, secondary regulations and guidance issued by the Home Office. It has been kept under constant review since that date. The current (sixth) version of the policy for 2021 – 2026 was a full revision and was adopted at council assembly on 25 November 2020 and came into effect in January 2021.
5. Since the commencement of the current 2021-2026 statement of licensing policy, there have been a number of issues that have arisen at licensing sub-committee meetings where members, responsible authorities and applicants have requested clarification. The amendments in this revision seek to clarify Southwark's position and are believed to be appropriate and necessary.
6. On 1 September 2025, the Licensing Committee agreed that amendments to the policy and to extend the Late Night Levy to include late night refreshment premises operating between 00:00 (midnight) and 06:00 should be put to a full public consultation.
7. In accordance with our statutory obligations, a full review of the policy and public consultation has been undertaken.

KEY ISSUES FOR CONSIDERATION

Revised Policy Amendments

8. The changes that have been made to the policy are as follows:

Item	Details
Comprehensive Policy Revision	A full review of the current policy to enhance clarity, accessibility, and simplicity.
Updated Structure and Layout	The policy has been restructured to better reflect the roles of the Licensing Authority and Licensing Committee.
Document Introduction	The policy now opens with a foreword from the Chair of the Licensing Committee, followed by an Executive Summary and an overview of the London Borough of Southwark, including ward profiles and core principles.
Purpose and Scope of the Licensing Policy	Revised for clarity and to reflect legislative and policy changes. Redundant content from other documents has been removed, with references provided where appropriate.

Item	Details
Personal Licence Applications	New content added to clarify the treatment of personal licence applications within the scheme of delegations.
Schedule of Delegations	Updated to improve clarity and remove duplication of legislative and third-party policy content.
Premises and Club Licence Applications	Lead paragraphs have been reworded, and mandatory conditions already covered by legislation and statutory guidance have been removed.
Cumulative Impact Areas (CIAs)	Introductory text has been revised for clarity. Detailed CIA descriptions and improved maps are now located in Appendix B.
Early Morning Restriction Orders (EMROs) and Late Night Levy	These tools have been incorporated into the same chapter due to their shared purpose in addressing similar issues.
Hours of Operation	The previous 'suggested times' have been replaced with a new table of 'recommended licensable hours', tailored by premises type and location.
Licensing Objectives	Each of the four licensing objectives is now clearly presented as a sub-section
Crime and Disorder	Rewritten to focus on key issues. Outdated references and unrelated policies have been removed. Adult entertainment content has been redirected to the relevant standalone policy.
Public Safety	Streamlined to remove duplicated third-party guidance while retaining references to key legislation.
Prevention of Public Nuisance	Revised to focus on core issues. Includes new guidance on outdoor and large-scale events requiring early engagement.
Protection of Children from Harm	Outdated content and references (e.g. PAL London card scheme) have been removed. Updated age verification guidance and child access provisions are included, along with references to relevant child welfare agencies.
Extend submission time to the Licensing Service	from 1 month to 2 months for Film certifications
Enforcement Policy	Matters have been updated with no change in emphasis.

Item	Details
Appendix A - Contact Details	Contact details checked and updated.
Appendix B - Cumulative Impact Areas	Details of each CIA updated where required, with clear mapping.
Appendix C - Other related legislation and Strategies	Update of the Safer Women's Charter, inclusion of other safety schemes and Safe Havens.
Other related legislation and Strategies	Updated information and the inclusion of a reference to Terrorism (Protection of Premises) Act 2025 (Martyn's Law).
Extend the Late Night Levy	To incorporate premises that provide late-night refreshment between 00:00 (midnight) and 06:00.

Consultation for 2026-2031 statement of licensing policy

9. Public consultation of the revision of the Southwark statement of licensing policy has been undertaken with in accordance with section 5(3) of the Licensing Act 2003.
10. The consultation process was designed to be inclusive and participatory, ensuring that all voices were heard and considered. By engaging a diverse range of stakeholders, the council ensured the policy reflected community priorities while meeting statutory obligations. This approach demonstrated a commitment to transparency and fairness, making the consultation a genuine opportunity for engagement rather than a formality.
11. Feedback mechanisms were designed to be user-friendly, allowing stakeholders to share views easily. The adaptive online and offline strategy ensured messages were clear and accessible, meeting people where they are and using language that resonates. Respondents were asked to rate licensing objectives such as crime prevention, public safety, and protection of children, and were invited to suggest improvements.
12. As per the requirements of the Act, the council consulted on the revision of its Statement of the Licensing Policy 2026-31. The council complied with all statutory duties through:
 - A six-week statutory consultation was held from 19 September to 31 October 2025.
 - Use of various engagement channels, including an online survey, drop-in sessions, officer visits, leaflet distribution, and targeted outreach engagements.

- Promotion via email campaigns, website/email banners, and QR codes in libraries.
13. The consultation received 140 responses. The majority of respondents agreed that the draft policy was clear, well-structured, and balanced. There was robust support for maintaining the four statutory licensing objectives, and respondents recognised these objectives as fundamental to promoting public safety, preventing crime and disorder, protecting children from harm, and minimising public nuisance.
 14. However, the results also highlighted several operational concerns, particularly relating to the lack of enforcement. It is important to note that these issues are operational in nature and do not impact the substance or direction of the revised licensing policy. The overall response to the policy itself has been positive.
 15. The feedback recorded has been analysed, and full details of the results are provided in **Appendix B**.
 16. Where appropriate, changes have been incorporated into the revised policy. These amendments were mainly grammatical and/or clarity corrections and updates to relevant links in the policy.
 17. The policy has also been amended in line with the recent revised s.182 guidance and the National Licensing Policy Framework, published in November 2025, namely, to provide further clarity on Temporary Event submissions. The policy also reflects the Authority's commitment and acknowledges that where any inconsistency arises between this framework and the 2003 Act/section 182 Guidance, the Act and s.182 guidance prevails.
 18. The Statement of Licensing Policy 2026 – 2031 can be found at **Appendix A**.
 19. The committee is asked to consider the latest revision of the policy with a view to referring the matter to council assembly for adoption on 26 March 2026.

Community, equalities (including socio-economic) and health impacts

Community impact statement

20. The Southwark statement of licensing policy recognises that as long as alcohol and regulated entertainment licensed premises are well run and premises management acknowledges the value of working together with the local community, they can make a significant contribution toward building community cohesion and cultural development.

21. The policy equally recognises that negative impacts can also occur if good management practices are not followed. Potential negative impacts may arise in the form of noise, nuisance, disturbance and crime and disorder problems. With establishments selling alcohol there are also risks of individual alcohol addiction.
22. The policy seeks to provide the necessary balance between responsible business operators contributing toward a thriving business and late night economy whilst ensuring that the quality of life of those who live and work in the Borough is protected and enhanced through the licensing system. We believe these aims are achievable if all parties concerned work together.
23. Central to this, is a licensing process which aims to be inclusive and ensures that local community concerns are understood, debated and resolved. This is supported by offering broad support to licensees, through the range of involved authorities, to establish best practice management, and by a strong directed enforcement resource.

Equalities (including socio-economic) impact statement

24. Equality impact assessments are an essential tool to assist Councils to comply with the equalities duties and to make decisions fairly. Equalities and human rights impact assessments that are carried out should be mindful of the protected characteristics under the Equality Act 2010.
25. An assessment was carried out in relation to the revision of the policy prior to the consultation. Members will need to consider whether there are any potential negative impacts on the protected characteristics as outlined in the assessment at the Committee Hearing. A further assessment has been carried out following the public and statutory consultation in preparation for returning to the Licensing Committee. The current assessment is available in **Appendix C**. Any decision made by Members of the Committee will also have to hold this in mind.

Health impact statement

26. Licensing policies have an important role in promoting a healthier environment and protecting public health in Southwark. This policy enables licensed premises to introduce operating practices that aim to minimise risks to health and safety, such as binge drinking, accidents, and violence. It also allows the authority to restrict new licenses where the cumulative impact of licensed premises is negatively affecting local communities, through nuisance or disorder. Areas with high densities of licensed premises can be associated with increased rates of alcohol related hospital admissions, ambulance call outs, crime and antisocial behaviour. The policy can support licensing practice that reduces alcohol-related harm, which can disproportionately affect vulnerable communities.

Climate change implications

27. On 27 March 2019, the council declared a climate emergency and considers the implications of climate change in all of its decisions.
28. Southwark expects patrons to be mindful that Southwark has declared a climate emergency. In this context, operational measures such as abstaining from the use of patio heaters and avoiding the use of single-use plastics and following government guidance may be considered.
29. Decisions on licences must be in line with the licensing objectives; however as a physical premises requires planning consent, climate change can be addressed as part of the planning process.

Resource implications

30. The Southwark Statement of Licensing Policy 2026-2031 has no resource issues.
31. The resource costs of managing this process may be borne within the current licensing budget.

SUPPLEMENTARY ADVICE FROM OTHER OFFICERS

Assistant Chief Executive - Governance and Assurance

32. The Licensing Act 2003 (“the 2003 Act”) requires the council, as the licensing authority, to prepare and publish a statement of its licensing policy every five years.
33. In determining its policy, the council is exercising a licensing function and as such must have regard to the guidance issued by the Secretary of State under section 182 of the 2003 Act. It must also give appropriate weight to the views of those persons/bodies listed in section 5(3) of the Act, which it is required to consult before determining its policy.
34. Although the guidance represents best practice, it is not binding on the council. As long as the guidance has been properly and carefully understood and considered, licensing authorities may depart from it if they have reason to do so. In this event they will need to give full reasons for their decisions, which must be consistent with the objectives of the 2003 Act.

The Licensing Authority should take into account of the National Licensing Policy Framework (NLPF) (see: [National Licensing Policy Framework for the hospitality and leisure sectors \(web version\) - GOV.UK](#)), published in November 2025, when preparing this Statement of Licensing Policy. While the NLPF is non-statutory, its objectives and guidance is designed to support consistent, lawful and proportionate licensing decisions and policy development.

35. The council is required to have regard to the statement of licensing policy and make decisions in accordance with it. Licensing authorities may depart from their policy if the individual circumstances of any case merit such a decision in the interests of promoting the licensing objectives. In this event it is important that full reasons are given for departing from the published statement of licensing policy.
36. Members should note that the 2003 Act imposes a duty on the council, as the licensing authority, to carry out its functions under the Act with a view to promoting the four licensing objectives, namely:
 - the prevention of crime and disorder
 - the promotion of public safety
 - the prevention of public nuisance
 - the protection of children from harm.
37. Each of these objectives is of paramount and equal importance. There are no other licensing objectives, and therefore the council cannot reject an application for a licence or impose conditions on a licence for any purpose unrelated to the promotion of these objectives. For example, whether or not there is a 'need' for another licensed premises in a given area is a matter for planning committees but is not a matter for a licensing authority in its statement of licensing policy or in discharging its licensing functions.
38. However, the cumulative impact of licensed premises on the promotion of the licensing objectives is a proper matter for the council to consider when adopting its statement of licensing policy. The guidance explains 'cumulative impact' as the potential impact on the promotion of the licensing objectives - for example crime and disorder and/or public nuisance - of a significant number of licensed premises concentrated in one area.
39. The statement of licensing policy cannot seek to impose 'blanket' conditions. Each application must be considered on its own merits. Conditions can only be imposed on a licence if they are necessary to promote the licensing objectives in relation to the specific premises and are a proportionate response to the specific situation to be addressed. The guidance provides that if the situation the condition is intended to address is already addressed by a provision in the 2003 Act or any other legislation, then the condition cannot be said to be 'necessary'.
40. Licensing is about regulating the carrying out of licensable activities within the terms of the 2003 Act. The statement of licensing policy should make it clear that licensing law is not the primary mechanism for the general control of nuisance and anti-social behaviour by individuals once they are beyond the direct control of the individual, club or business carrying on licensable activities. However, the guidance also states that licensing law is a key aspect of such control and should always be part of a holistic approach to the management of the evening and night-time economy. It is therefore desirable that the statement of licensing policy is in line with the

council's wider objectives and consistent with other policies.

41. Members should note that the statement of licensing policy must not be inconsistent with the provisions of the 2003 Act and must not override the right/s of any individual as provided for in that Act. Nor must the statement of licensing policy be inconsistent with obligations placed on the council under any other legislation, including human rights legislation. Members should also note that the council has a duty under Section 17 of the Crime and Disorder Act 1998, when carrying out its functions as a licensing authority under the 2003 Act; to do all it reasonably can to prevent crime and disorder within the borough.
42. Positive equalities obligations are placed on local authorities, sometimes described as equalities duties, with regard to race, disability and gender. Race equality duties were introduced by the Race Relations Amendment Act 2000, which amended the Race Relations Act 1976. Gender equalities duties were introduced by the Equality Act 2006, which amended the Sex Discrimination Act 1975. Disability equality duties were introduced by the Disability Discrimination Act 2005 which amended the Disability Act 1995.
43. Under the Local Authorities (Functions and Responsibilities) (England) Regulations 2000, as amended, decisions relating to licensing matters cannot be the responsibility of an authority's executive. The 2003 Act provides that whilst the majority of the functions of the licensing authority, are to be taken or carried out by its licensing committee, decisions relating to the statement of licensing policy cannot be delegated in such a way. The decision on whether to adopt the statement of licensing policy must therefore be taken by council assembly.

Strategic Director of Resources

44. This report is requesting the licensing committee to consider the recommendations set out in paragraph 1 above. The Strategic Director Resources notes the recommendations and that there are no identified additional resource implications as a result of these proposals, and notes that staffing and any other running costs connected with these recommendations are to be contained within existing departmental revenue budgets.

BACKGROUND DOCUMENTS

Background Papers	Held At	Contact
The Licensing Act 2003 plus secondary regulations	The Licensing Service, C/O 160 Tooley Street, London, SE1	Name: Mrs Esther Jones Email: esther.jones1@southwark.gov.uk
The Home Office Guidance to the Act (November 2025)		
Local Government (Miscellaneous Provisions) Act 1982		
National Licensing Policy Framework for Hospitality and Leisure Sectors (November 2025)		

APPENDICES

No.	Title
Appendix A	Southwark Statement of Licensing Policy 2026 – 2031
Appendix B	Consultation responses
Appendix C	Equalities Impact and Needs Analysis

AUDIT TRAIL

Lead Officer	Aled Richards, Strategic Director of Environment, Sustainability and Leisure		
Report Author	Bina Patel, Business Unit Manager Neighbourhood Nuisance		
Version	Final		
Dated	2 December 2025		
Key Decision?	Yes		
CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / CABINET MEMBER			
Officer Title		Comments Sought	Comments Included
Assistant Chief Executive – Governance and Assurance		Yes	Yes
Strategic Director of Resources		Yes	Yes
Cabinet Member		No	No
Date final report sent to Constitutional Team			15 January 2026

Licensing Act 2003

Statement of Licensing Policy 2026 – 2031

London Borough of Southwark

January 2026

(adopted by Council Assembly March 2026)

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LEGAL BACKGROUND TO THIS DOCUMENT

The Licensing Act 2003 came into effect on 24 November 2005.

It replaced previous legislation on alcohol, entertainment, and late-night refreshment, introducing a new licensing system overseen by local Licensing Authorities.

Under Section 5 of the Act, each Licensing Authority must prepare and publish a statement of licensing policy every five years. Southwark's first Statement of Licensing Policy was formally approved on 8 December 2004. Since then, it has been reviewed, revised, and updated in line with the Act's requirements to reflect changes in law, national guidance, and local policy. Each revision has been shaped through public consultation, with full consideration given to the Act itself, its regulations, and the Section 182 guidance issued by the Home Office.

It should be noted that a Licensing Authority may depart from its policy if the specific circumstances of a case justify such a decision, in the interests of promoting the Licensing Objectives.

FOREWORD BY THE LICENSING CHAIR

The London Borough of Southwark comprises a broad and diverse array of licensed premises and venues. Approximately 1,500 establishments are currently licensed for the sale or supply of alcohol, the provision of regulated entertainment, and/or the provision of late-night refreshment. These include, but are not limited to, public houses, bars, nightclubs, members' clubs, theatres, cinemas, indoor sporting facilities, restaurants, cafés, takeaways, off-licences, supermarkets, and grocery stores. Collectively, these establishments contribute significantly to the Borough's vibrancy by offering a wide range of leisure and cultural opportunities, supporting tourism, generating employment, and making a substantial contribution to the local economy. Many of these establishments employ young, local residents, nationally over half of the pub workforce is under 25 and 620,000 young adults work in hospitality and leisure. This Authority fully acknowledges the importance of the leisure and entertainment sector in enhancing the social and economic fabric of the Borough.

This Authority is of the view that, where licensed premises are operated responsibly—with a clear commitment to upholding the licensing objectives, maintaining safe and well-managed environments, and engaging constructively with the Council, its partners, and the local community, they can serve as positive forces for community cohesion and cultural development. It is also recognised that alcohol plays an inherent role within the leisure and entertainment industry.

Nevertheless, this Authority is equally aware of the potential adverse impacts arising from poor management practices. These may include antisocial behaviour, public nuisance, disruption to residents, and more serious incidents of crime and disorder. Alcohol misuse, in particular, is a significant contributing factor in such issues. Alcohol-related violence, disorder, and public rowdiness place considerable pressure on local services, including accident and emergency departments, policing, street cleansing, and the criminal justice system. This Authority does not consider it acceptable for the residents of Southwark to bear the consequences of irresponsible business operations.

Accordingly, this policy seeks to strike an appropriate balance: enabling responsible operators to thrive and contribute to a dynamic and diverse local economy, while ensuring that the quality of life for those who live and work in the Borough is preserved and enhanced. This Authority firmly believes that these aims are achievable through active and ongoing collaboration among all relevant stakeholders.

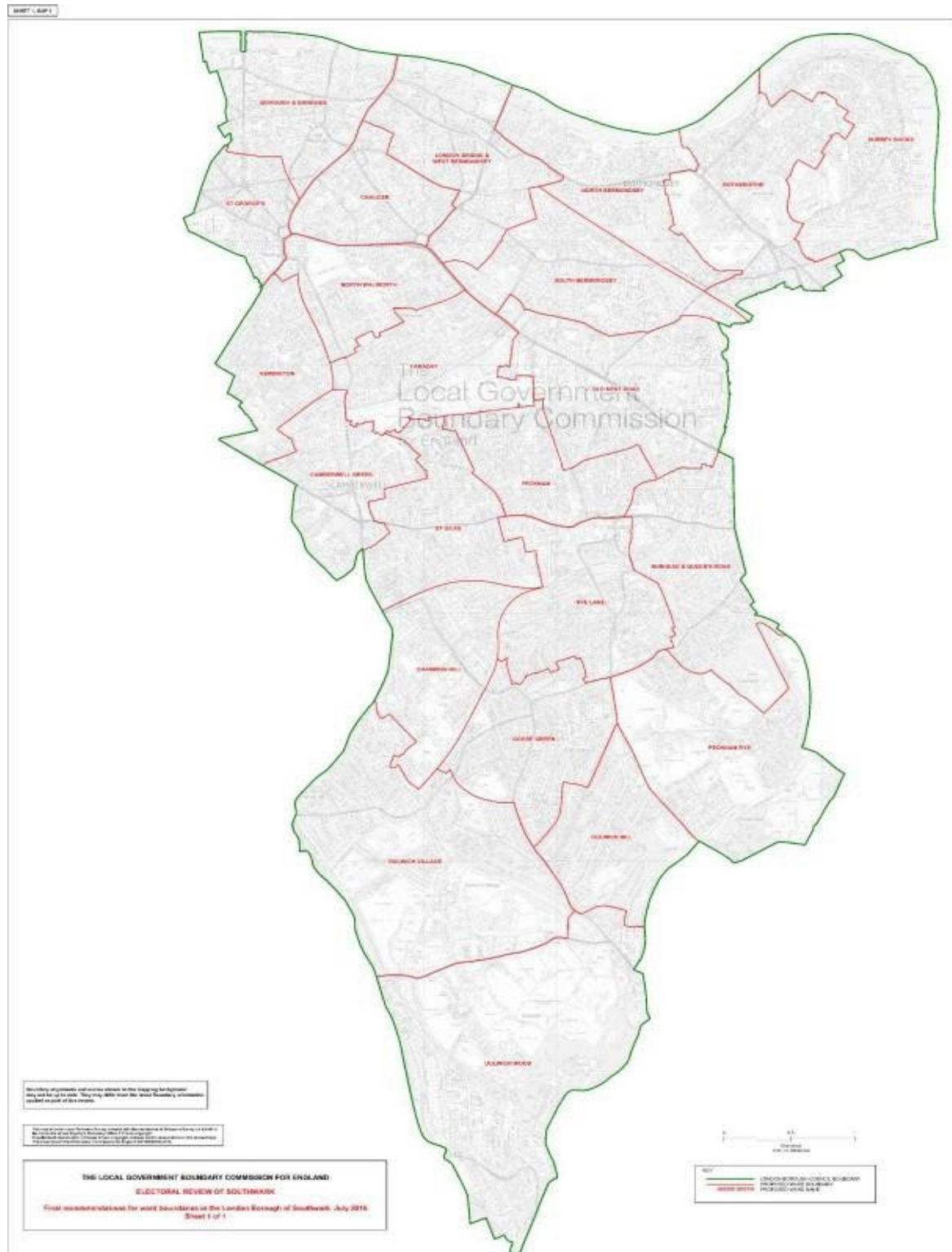
Southwark's Responsible Authorities have a best practice set of recommended conditions, and it is strongly suggested that these are viewed by all applicants ([click link here](#)).

Southwark expects applicants to be mindful that the Council has declared a Climate Emergency. In this context, applicants should be cognisant that this local authority expects that, where possible, environmentally responsible operational practices are implemented by licensed premises. —These include avoiding the use of patio heaters, eliminating single-use plastics where possible (for example, opting for reusable polycarbonate drinkware and non-plastic takeaway containers), and encouraging customers to use active travel/public transport to their premises. All measures should align with current government guidance.

The introductory sections of this policy set out the context of the Borough and the role of the Council, while also outlining how this Authority discharges its statutory licensing responsibilities and manages associated administrative processes.

Chapter 1 - ALL ABOUT SOUTHWARK

Borough Map



Our Borough

1. History

Southwark is one of London's oldest areas, with a rich history that stretches back to Roman times. The early development of Southwark was due to its position at the southern end of London Bridge, which for centuries was the sole bridge linking north and south London. Southwark was originally part of Surrey.

In Victorian times, the area was divided into the Parishes of Bermondsey, Camberwell, Newington, and Southwark, St George the Martyr with remaining parishes being within St Olave and St Saviour's district. In 1900, these were reorganised into the Metropolitan Boroughs of Bermondsey, Camberwell and Southwark. In 1965, with the merger of the three Boroughs under the London Government Act 1963, the current boundaries of Southwark were established.

2. Geography Demographics of Southwark (*Office for National Statistics, 2021*)

- a. **Population:** Between the 2011 and 2021 censuses, Southwark's population grew by 6.7%, from approximately 288,300 to 307,600.
- b. **Households:**
 - I. Households with couples and no children rose from 14.3% to 16.3%.
 - II. Households with couples and dependent children fell from 13.6% to 12.7%.
 - III. Households with couples and only non-dependent children rose from 2.9% to 3.3%.
- c. **Languages:** English is the main language for 89% of residents, with Spanish also widely spoken (by 20%). Around 10,000 residents who do not speak English as a main language reported speaking it poorly.
- d. **Ethnicity:**
 - I. 51% identify as having a White ethnic background.
 - II. 25% identify as Black British, Caribbean, or African.
 - III. 10% identify as Asian or Asian British.
- e. **Employment:**
 - I. The employment rate increased from 59.6% in 2011 to 62.7% in 2021.
 - II. The proportion of residents aged 16 and over who are retired fell from 9.4% to 8.6%.

3. Regeneration and Growth

While Southwark continues to address the complex social, health, and economic challenges typical of an inner-city area, levels of deprivation have decreased in recent years. This Borough is becoming one of London's most dynamic areas, with a 20-year regeneration programme underway. This initiative aims to deliver up to 20,000 new homes and 10,000 new jobs.

4. Southwark is committed to supporting existing businesses and industries, while also creating opportunities for new commercial development. Major regeneration projects are taking place in areas including the Aylesbury Estate, Borough, Bankside and London Bridge, Canada Water, Elephant and Castle, Old Kent Road and Peckham.

[The 2021 Census overview | Southwark Council](#)

Leading Southwark

5. Council Governance

The London Borough of Southwark is divided into 23 wards (as seen on the map), represented by 63 elected councillors. These councillors form the Council Assembly, the

sovereign body of the Council, chaired by the Mayor of Southwark. Council Assembly is responsible for adopting and amending the Council's constitution, approving the policy framework and annual budget, electing the Mayor and Council Leader, and reviewing motions and making decisions on agenda items.

6. Cabinet Structure

The Cabinet is led by the Council Leader and Deputy Leader. It consists of a total of ten members in total, each holding an individual portfolio.

7. Cabinet Responsibilities

The Cabinet leads the community planning and consultation process, drafts the Council's budget and policy framework, and is responsible for most decisions relating to resources and priorities.

8. Scrutiny Committees

Scrutiny Committees oversee Council decisions and ensure transparency and accountability. They examine Council services, budgets, and policies, and have the power to 'call in' decisions made by the Cabinet, recommending changes or further consideration where necessary.

9. Licensing Authority Responsibilities

As the designated Licensing Authority, Southwark Council must carry out its licensing functions with a view to promoting the four statutory licensing objectives. To achieve this effectively, a council must establish a Licensing Committee composed of at least 10, but no more than 15, elected members. Southwark has a cross-party committee of 15 members.

10. Licensing Sub-Committees and Delegated Authority

Decisions on Licensing applications may be made by Delegated Authority. Where applications are referred to be considered by committee, a sub-committee consisting of three members from the main committee is established to determine the following applications or reviews:

- Premises licences
- Provisional statements
- Club premises certificates
- Temporary event notices
- Personal licences for the sale or supply of alcohol
- Licensing Sub-Committees are not politically based and have a quasi-judicial function.

[Southwark 2030 delivery plan](#)

Chapter 2 – GENERAL INFORMATION

11. Licensing and regulatory services play an important role in making Southwark safer and ensuring that all residents can enjoy their local neighbourhoods. This Authority recognises that licensing law is not the primary tool for addressing nuisance or anti-social behaviour once individuals are beyond the control of the licence holder—whether a business, club, or individual. However, licensing remains a vital element in managing such issues and forms part of a wider, coordinated approach to regulating the evening and night-time economy in local, town and city centres.
12. Other Mechanisms to Address Behaviour Away from Licensed Premises
The following mechanisms are available to address unruly behaviour that may occur beyond licensed premises:
 - **Use of intelligence:** Maximising the use of intelligence sources, ensuring information is identified, analysed, and shared among all relevant partner agencies.
 - **Partnership resources:** Coordinating resources efficiently and targeting them intelligently where they are most needed to achieve maximum benefit.
 - **Regulatory powers:** Making full and effective use of the powers available to partner agencies beyond licensing, including those under Police, Anti-Social Behaviour, Trading Standards, and Environmental Health legislation.
 - **Support for operators:** Providing good communication, liaison, and training opportunities for responsible operators. Examples include:
 - The Police and Council's Night-Time Economy Team, which provides visible policing, fosters strong working relationships with venue operators and front-of-house staff, and offers reassurance within the night-time economy.
 - "Conflict resolution training" provided by the Council's Health and Safety Team, designed for retail staff to manage workplace violence and aggression.
 - **Planning controls:** Coordinating with Planning to ensure applicants secure planning permission as well as a licence. In cases where planning permission sets a terminal hour for commercial use, applicants must observe the earlier closing time if these differ from Licensing hours.
 - **Infrastructure:** Supporting infrastructure improvements such as CCTV coverage across the Borough, enhanced street lighting, late-night public conveniences, street cleaning, and litter patrols.
 - **Campaigns:** Working with partners (such as the Drugs and Alcohol Action Team under Community Safety and the Safer Southwark Partnership) to deliver initiatives like "Safe World Cup," "Safety Glasses," and "Talking Signs."
 - **Business partnerships:** Developing schemes that benefit local communities, including Business Improvement Districts (BIDs), Better Bankside, Blue Bermondsey BID, South Bank BID, Team London Bridge, and We Are Waterloo.
 - **Cumulative Impact Areas:** Designating specific areas where special rules apply to

prevent communities being disadvantaged by over-concentration of one type of entertainment. Details and maps are provided in Appendix B.

- **Pubwatch and similar schemes:** Supporting the establishment of pubwatch schemes. Further information is available at www.nationalpubwatch.org.uk.
 - **Social responsibility:** Encouraging socially responsible licensed operations through schemes such as the Southwark Women's Safety Charter, Ask for Angela, and Ask for Clive.
13. The Council will use its full range of powers, engage all relevant responsibilities, and work with partners to achieve the licensing objectives.
 14. This policy does not outline the specific circumstances under which authorisations may be required, nor does it explain the licensing processes in detail. Applicants must consult the Licensing Act 2003 and the latest Statutory Guidance before contacting the Licensing Authority.
 15. There is a link to the government guidance accompanying the application forms on the Council's licensing web pages: [Alcohol, late night and entertainment licensing | Southwark Council](#)
 16. Applications will progress in accordance with procedures laid down by the Licensing Act 2003, secondary legislation, and any accompanying applicable guidance under Section 182 of the Act as produced by the Home Office. Prospective applicants should refer to the separate relevant guidance documents for further details. [Revised guidance issued under section 182 of the Licensing Act 2003 \(November 2025\) \(accessible version\) - GOV.UK](#)

Southwark and the leisure and entertainment industry

17. Southwark offers a wide-range of leisure and cultural opportunities. The north of the Borough is recognised as one of London's fastest growing tourist quarters and a thriving business hub. The area encompasses some of London's top attractions (including Shakespeare's Globe Theatre, the Tate Modern, and the Ministry of Sound).
18. Elsewhere across the Borough, there are many other creative hotspots in areas such as Elephant and Castle and Peckham and a very broad variety of leisure and cultural opportunities to serve the varied needs of our diverse communities. These include clubs and bars, restaurants and cafes, galleries, theatres and cinemas.
19. Southwark currently has over 1600 premises licensed for the sale and supply of alcohol and/or regulated entertainment and late night refreshment. Of these, more than 1000 are licensed for the sale and supply of alcohol. Between 90% to 100% of licensed premises operate between 11:00 and 23:00. Additionally, many hundreds of small, occasional and community-focused events are staged across the Borough each year under Temporary Event Notices.
20. At the local level, alcohol-related harm in Southwark has a significant impact, particularly in terms of ambulance callouts and crime. However, this impact is not evenly distributed across the Borough. Local data shows that alcohol-related incidents tend to increase as the day progresses, peaking in the late evening and early morning hours—especially at weekends.
21. Southwark Council Community Partnership from 2023-2024 provides ambulance and

hospital data together with crime and anti-social behaviour (ASB) data summarised below.¹

London Ambulance Service (LAS) Callouts and Hospital Presentations to A&E for Violence (Data source: SafeStats)

Hospital presentation data is currently only available up to September 2023 and does not cover the full 2023/24 financial year. Ambulance data is based on the first callout to an incident to avoid double-counting.

Key Observations:

- Although violence-related offences in the Borough increased by 8.5%, this has not been reflected in London Ambulance Service (LAS) callouts, which have decreased by 7% since 2021/22.
 - The largest reductions were in South Bermondsey (-15 callouts) and Goose Green (-14 callouts).
- The highest volumes of LAS callouts in 2023/24 were recorded in:
 - London Bridge & West Bermondsey (9.8%)
 - North Walworth (8.7%)
 - Borough and Bankside (8%)
 Combined, these three areas accounted for 26.5% of all callouts.
- Knife injury-related callouts rose by 21.3%, a much higher increase than the 2.2% rise in recorded knife offences.
 - Trend data indicates that LAS callouts peak in summer months, aligning with a seasonal increase in weapon-related violence across the Borough.
- Hospital presentations for both general violence and knife injuries have decreased significantly, which may be due to data quality or recording issues.
 - A significant spike in presentations in February 2021/22 does not align with patterns observed in LAS callouts or knife offence data.

Crime and Disorder in Southwark: Total Notifiable Offences (TNOs)

- Since 2021/22, total notifiable offences (TNOs) in Southwark have risen by 18.2%, compared with a 12.2% increase across London.
 - In 2023/24, Southwark ranked 4th highest in London and 2nd highest among its Statistical Neighbour Group for TNOs.
- Across all reporting years, Southwark has consistently reported a higher offence rate per 1,000 population than the London average.
- As an inner London borough, Southwark includes high-footfall areas which naturally present greater opportunity for offences.
 - Key hotspot locations include London Bridge, Elephant and Castle, and Peckham Rye Stations.
- Peak periods for offending remain consistent across the years:
 - Higher volumes are reported between April and September, possibly due to longer daylight hours.

¹ [CSP Strategic Assessment 2324](#)

- Fridays and Saturdays see the highest levels of offending.
- Peak times are 12am–1am and 3pm–7pm.
- Note: The 12am–1am peak may be skewed by the Metropolitan Police Service's (MPS) default data entry, where this time is recorded when the exact time is unknown or the offence occurred over several days.

Source: [*CSP Strategic Assessment 2324*](#)

Key Findings – Cumulative Impact Areas (CIAs)

22. Within established CIAs:
 - Proportional changes in alcohol-related violence between 2018/19 and 2022/23 are not statistically significant.
 - Reported increases in alcohol-related LAS callouts are due to a methodological change, not actual incident volume.
 - Rowdy behaviour and street drinking in CIAs are at their lowest levels since the CIAs were first introduced.

Chapter 3 - PURPOSE AND SCOPE OF THE LICENSING POLICY

Purpose of the policy

23. This policy has five main objectives:

- To reinforce, for the benefit of elected members on the Licensing Committee, the powers and constraints placed upon the Local Authority as Licensing Authority by the 2003 Act;
- To set out, for the benefit of prospective Applicants, Responsible Authorities, local residents, and licensed operators, the parameters under which this Authority will make its licensing decisions;
- To inform prospective licensees how a licensed premises is likely to be able to operate within an area;
- To inform local residents and licensed operators how their needs will be addressed;
- To minimise the number of licensing decisions that may be challenged in a court of law.

Scope of the policy

24. The Licensing Act 2003 regulates the following activities:

- The sale by retail of alcohol.
- The supply of alcohol by or on behalf of a club to, or to the order of, a member of the club.
- The provision of regulated entertainment.
- The provision of late night refreshment.

Types of authorisation

25. The Act provides for four different types of authorisations or permissions as follows:

- Personal licences – to sell or authorise the sale of alcohol from premises in respect of which there is a premises licence.
- Premises licences – to use a premises for licensable activities.
- Club premises certificates – to allow a qualifying club to engage in qualifying club activities.
- Temporary Event Notices (TENs) - to carry out licensable activities at a temporary event.

26. The scope of this policy covers new applications for licences, and club premises certificates, transfers, variations, time-limited premises licences and TENs. It also covers the review and possible revocation of licences and certificates.

27. In general, a reference in this policy to a premises licence will also include a club premises certificate.

Definitions: 'Regulated Entertainment' includes:

- ☐ A performance of a play;
- ☐ An exhibition of a film;
- ☐ An indoor sporting event;

- ☐ A boxing or wrestling entertainment;
 - ☐ A performance of live music;
 - ☐ Any playing of recorded music;
 - ☐ A performance of dance;
 - ☐ Entertainment of a similar description to a performance of live music and playing of recorded music or a performance of dance. For the entertainment to be licensable, one or more of these activities must take place in the presence of an audience and be provided (at least in part) to entertain that audience upon premises made available for the purpose.
28. There are a number of exemptions contained in the Act. Schedule 1, Part 2 of the Licensing Act 2003 deals with the provision of regulated entertainment and its exemptions. It outlines which types of entertainment require a licence and which are exempt from licensing. Please refer to <https://www.legislation.gov.uk/ukpga/2003/17/schedule/1>
29. Also, since the introduction of the Live Music Act 2012, a number of deregulatory steps have been taken. For the current up-to-date position, please contact the licensing service (contact details are in Appendix A of this policy).

Definition - Late Night Refreshment

30. Late night refreshment is defined as the supply of hot food or hot drink to members of the public from or in a premise for consumption on or off the premises, between the hours of 23:00 and 05:00. Premises include vehicles and stalls.

Definition - Nightclub

Southwark considers a nightclub to be purpose-built premises with the requisite planning permission in place. A premises that is open from the evening until early morning, usually for drinking, dancing and other entertainment. Whilst there is no legal definition, such premises usually consist of a bar, a dance floor, laser lighting displays, and a stage for live music or a disc jockey (DJ) and are the primary reasons for public attendance.

The Licensing Objectives

31. In carrying out its licensing functions, the Council will promote the four licensing objectives set out in the Licensing Act 2003. They are:
- The prevention of crime and disorder;
 - Public safety;
 - The prevention of public nuisance;
 - The protection of children from harm.
32. Each objective is of equal importance, and the promotion of the four objectives is paramount at all times. It is the responsibility of all parties involved in the licensing process to always work together toward these licensing objectives. The four objectives are considered in more detail in Chapter 8 of this document.
33. The legislation supports many other key aims and purposes. These are vitally important and should be the principal aims for everyone involved in licensing work. They include:

- Protecting the public and local residents from crime, anti-social behaviour and noise nuisance caused by irresponsible licensed operators;
 - Giving the Police and Local Authorities the powers they need to effectively manage and police the night-time economy and take action against those premises that are causing problems;
 - Recognising the important role which pubs and other licensed premises play in our local communities by minimising the regulatory burden on businesses, encouraging innovation and supporting responsible premises;
 - Providing a regulatory framework for alcohol which reflects the needs of local communities and empowers Local Authorities to make and enforce decisions about the most appropriate licensing strategies for their local area;
 - Encouraging greater community involvement in licensing decisions and giving local residents the opportunity to have their say regarding licensing decisions that may affect them.
34. Each licence application will be considered on its own merits and in accordance with the Licensing Act 2003, secondary legislation, S.182 guidance and this policy.

Fundamental principles

35. Licensing is about regulating licensable activities on licensed premises, by qualifying clubs and at temporary events within the terms of the 2003 Act.
36. If an application for a premises licence or club premises certificate has been made lawfully and there have been no representations from Responsible Authorities or other persons, this Authority must grant the application, subject only to conditions that are consistent with the operating schedule and relevant mandatory conditions. (*conditions link - TBC*).
37. Conditions attached to the various authorisations will be focused on matters which are within the control of individual licence holders and others with relevant authorisations, i.e. the premises and its vicinity. This will include the direct impacts of the activities taking place at the licensed premises on members of the public living, working or engaged in normal activity in the area concerned.
38. Club premises certificates may only be issued to qualifying clubs. To be eligible for a club premises certificate, the club membership must have joined together for a particular social, sporting or political purpose. Qualifying clubs are specified in Section 61 of the Act, and sufficient evidence must be supplied with the application to satisfy those conditions. <https://www.legislation.gov.uk/ukpga/2003/17/part/4/crossheading/qualifying-clubs>
39. While this statement sets out the Council's general approach to the making of licensing decisions, nothing in this statement undermines the right of any individual to apply under the terms of the 2003 Act for a variety of permissions and to have any such application considered upon its individual merits.
40. Similarly, this statement of policy does not override the right of any person to make representations on an application or to seek a review of a licence or certificate where provision has been made for them to do so in the 2003 Act. Absolute weight will be given to all representations. However, this will not include those that are frivolous, vexatious or repetitious.
41. The Council may depart from this policy in the interest of promoting the licensing objectives if the individual circumstances of any case merit such a decision. Where such decision is

taken, full reasons for the departure from the policy will be given.

Provision of scale plans

42. Applicants are required to submit a current scale plan of the premises when making an application for a new premises licence and a scale plan of the proposed layout and existing layout when part of any application for a variation of a premises licence.
43. Plans need not be professionally drawn, but must be drawn to scale to allow the applicant to provide the information each relevant authority requires. It is useful to include the plans, the size of the original drawing (for example, "1:100 when printed at A4"). Smaller-scale plans may be accepted, subject to the agreement from the Licensing Authority.
44. For clarity, internal and external areas intended to be used for the purpose of consumption of on or off sales of alcohol and late-night refreshment should be included.

Variations and New applications

45. Where a premises licence holder wishes to amend their licence, the Act allows licence holders to vary the licence/certificate. Two variation processes exist: -
 - 1) A simplified minor variation process provides for proposed variations that have no adverse impact upon the licensing objectives.
 - 2) A major variation process provides for variations that change the licensed area or original authorisations and may have potential adverse impact upon the licensing objectives.
46. It should be noted that changes to the structure or layout may only satisfy licensing objectives with a new application for a new premises licence/certificate.
47. The decision on whether an application may be suitable rests with the licensing authority, and applicants should discuss their proposals with the Licensing Team before submitting their application.

Provisional statements

48. While an application for a new premises licence can be made in respect of a premises not yet constructed/completed or, where substantial changes are proposed but not sufficiently for any responsible authorities to make a determination in respect of the application, this Council would prefer to see provisional statements sought in the first instance.
49. However, the Council acknowledges that any person defined in section 16 of the Act can apply for a premises licence before new premises or existing premises are constructed, extended or changed, as long as clear plans of the proposed structure exist and the Applicant is in a position to complete an operating schedule.
50. Responsible authorities will require such conditions sufficient to ensure public safety and legislative compliance. For further information, please refer to s182 of the Statutory Guidance.

Temporary Events Notices

51. The Act provides for a person who does not have an authorisation under the Act to carry out

a licensable activity on an unlicensed premises or carry out any licensable activity outside of the terms of a premises licence or club premises certificate by way of “temporary event notices” (TENs). Instead, a person wishing to hold an event at which such activities are proposed to be carried on (the “premises user”) gives notice to the Licensing Authority of the event.

52. There are two types of TENs: -

- 1) A standard TEN, which must be given to the Licensing Authority with at least 10 clear Working Days’ notice before the event, with the appropriate fee; and
- 2) Late TEN, which must be given to the Licensing Authority no earlier than nine clear working days, but with a minimum of five clear working days with the appropriate fee notice before the event.

More information on TENs can be found at <https://www.gov.uk/find-licences/temporary-events-notice>

53. All Temporary Event Notice (TEN) submissions must include enhanced detail and clarity to support responsible and swift decision-making by the licensing authority and responsible authorities. Each TEN must provide the following information:

- Precise Location & Boundaries: TENs must specify the full postal address and clearly define the boundaries of the event footprint, including distinct areas such as marquees, stages, beer gardens, or outdoor zones.
- Structures & Layout: Applicants must describe all temporary or permanent structures (e.g., tents, stalls, stages), specifying their size, position, and relationship to any fixed building.
- Licensable Activities: Clearly state the types of licensable activities proposed, including alcohol supply (on-site consumption vs takeaway) and any form of entertainment (live/recorded music, dancing), linked to the Licensing Act categories.
- Event Context & Capacity: TENs must explain the purpose of the event (e.g., fundraising fair, private party) and provide a realistic attendance estimate to ensure compliance with the 499-person limit and the total event duration cap.
- Timing Details: Include exact start and finish dates and times, showing daily operating hours.
- Clear, Mapped Language: Use unambiguous terms for locations (e.g., ‘north field marquee,’ ‘rear beer garden’) and consider attaching a site plan to illustrate boundaries and layout—even if not mandatory, it is strongly encouraged.

54. Failure to provide sufficiently detailed plans may result in processing delays, objections, or counter-notices by the authority.

Multiple TENs for a single event

55. Section 171 of the explanatory notes to the Licensing Act 2003 with regard to Section 101 of the Act, “Minimum of 24 hours between event periods”, states that:

“This section provides that there must be a minimum period of 24 hours between temporary events held on the same premises by a premises user or held by that user and another person who is related to, associated with or in business with that user. This prevents a premises user holding numerous consecutive temporary events as a means of avoiding an application for a

premises licence. If a temporary event takes place on premises that are included within or include other premises where another temporary event takes place, then the two events are deemed to take place on the same premises.”

56. In addition to section 101 of the Licensing Act 2003, the Licensing Authority considers that the use of more than one TEN within the same or adjacent premises at similar times to allow an event of over 499 persons attending at any one time is likely to give rise to an increase in public nuisance and crime and disorder. The increased number of patrons over 499 persons also gives a greater concern on the impact of the event on public safety and the prevention of harm to children.
57. Organisers of events whereby patrons will exceed 499 should not use the “light touch” approach with multiple TENS. Such events should be licensed by an application for a time-limited premises licence, to allow full consultation of the proposal and measures to promote the licensing objectives and allow greater opportunities to grant the application with appropriate conditions to promote the licensing objectives where appropriate.
58. Multiple TENs that are similar in times, or within 24 hours of each other, for the premises included within or adjacent to the premises that receive objections from a relevant person will be considered by the Licensing Sub-Committee.
59. Premises users for multiple TENs will be given the opportunity to demonstrate how they will ensure that the licensing objectives will not be undermined and that the total maximum capacity of 499 will not be exceeded. This will be balanced against evidence provided by the Police and/or Environmental Health Officers.

Major art and pop festivals carnivals fairs and circuses

60. We encourage organisers of major festivals and carnivals to approach the Council at the earliest opportunity to discuss arrangements for the licensing of their events and may require a time-limited premises licence. This will involve the preparation of a substantial operating schedule, full public consultation and a longer lead-in period.
61. The Southwark Events Team coordinates a Safety Advisory Group (SAG) with membership comprising all the emergency response authorities, which can provide support to event organisers on event planning if good time is allowed. All major events will be scrutinised by the SAG. Contact details for the Events Team are provided in Appendix A

Consultation Arrangements

62. This Authority understands that regulations under the Act require public notices to be of a size equal to or larger than A4; of pale blue colour; printed legibly in black ink, and in a font size equal to or larger than 16. It also recognises that applications may not be rejected on the basis of improper notification if public notices comply with this minimum standard.
63. However, to ensure that the notice of application displayed at the premises may be clearly seen and easily read by passers-by, this Authority recommends that public notices displayed be of A3 size in pale blue colour printed legibly in black ink in a font of size equal to or larger than 20. This Authority also asks that the notice summarise the proposed licensable activities and the proposed hours of opening and remain clearly displayed in a position where it may be readily seen by passersby for the period during which representations may be made. A public notice template in our preferred format is available on the licensing webpages for each licence at: <https://www.southwark.gov.uk/business-and-licences/beer-and-business-premises-licences/premises-licences/apply-premises-0> which can be printed onto blue A4-sized paper.

Checks will be made to ensure that the summary is properly displayed.

64. The licensing service supports the consultation process by maintaining a public register at: <https://app.southwark.gov.uk/>
65. The register details all current applications (alongside details of current licensed premises). It is open to any person who wishes to be kept up to date with the latest applications in their area, to subscribe to "licensing alerts". E-mail notifications are sent to subscribers when a new licence application is received within their local area. The licensing service will also notify local Ward Councillors of all new applications in their area.

Personal Licence Applications

66. Individuals who make an application for a personal licence from the 6th April 2017 must be entitled to work in the UK.
67. In order to discharge this duty, the Authority must be satisfied that an applicant has the right to work in the UK and requires applicants to submit one of the documents to demonstrate that the applicant has permission to be in the UK and that they are permitted to undertake work in a licensable activity. They do this in one of two ways:
 - a) by providing their 'share code' to enable the licensing authority to carry out a check using the Home Office online right to work checking service.
 - b) by providing copies or scanned copies of the documents which an applicant has provided, to demonstrate their entitlement to work in the UK as per information published on gov.uk and in guidance. [Employers' right to work checklist \(accessible\) - GOV.UK](#)
68. If a personal licence holder's right to live or work in the UK expires or is revoked, the personal licence will cease to have effect and must be returned to the licensing authority which issued it.

Responsible Authorities

69. The Responsible Authorities are public bodies which have a social and legislative interest in how licensed premises are managed. They must be notified of, and are entitled to lodge representations about, applications for premises licences or club premises certificates or variations. Responsible Authorities are also able to review a premises licence or club premises certificate.
70. Applicants should consult with the Responsible Authorities directly before making an application, as they will provide specific local advice and information about a draft operating schedule prior to submission. Contact details for the Responsible Authorities are given in Appendix A.
71. This Authority advises that it recognises the Southwark Children's Social Service as a competent body to provide advice on matters concerning the protection of children from harm.
72. It should be noted that the Director of Public Health is added as a Responsible Authority. While health is not included as a licensing objective, the Guidance to the Act recognises that health bodies may hold information which other Responsible Authorities do not, but which would assist a Licensing Authority in exercising its functions.

73. The Secretary of State for Home Affairs is a Responsible Authority responsible for ensuring those not entitled to work in the UK, and this task is undertaken by the Home Office and various Enforcement departments. Legislation prevents the issue or transfer of a premises licence or issue of a personal licence to a person who is not entitled to work in the UK.²

Representations

It is open to any "Responsible Authority", as defined under the Act or other person to lodge representations concerning a premises licence or club premises certificate application during the consultation period.

74. A representation will only be "relevant" if it relates to the likely effect of the grant of the licence on the promotion of at least one of the licensing objectives. A representation that fails to do this is not "relevant" for the purposes of the 2003 Act. It is for the Licensing Authority to determine on its merits whether any representation by an interested party is frivolous or vexatious, as provided in Table 1 - delegations of licensing functions on page 22.
75. Representations must be received in writing at the licensing service office by the last date for representations. Representations must be dated, provide the grounds of representation in full and include the name and address of the person/body making the representation.

Disclosure of personal details of persons making representations

76. Concerned parties are entitled to approach their elected representatives or local residents' group who may submit a representation or review application on their behalf.

² [The Immigration \(Restrictions on Employment and Residential Accommodation\) \(Prescribed Requirements and Codes of Practice\) and Licensing Act 2003 \(Personal and Premises Licences\) \(Forms\) Order 2021](#)

Chapter 4 – SCHEDULE OF DELEGATIONS FOR DECISIONS

Determination of applications

77. In accordance with the provisions of the Act, this Authority has established a Licensing Committee with a maximum of 15 members and provision for Sub- Committees of three members to be drawn from the overall pool of the main Committee membership.
78. In doing so, the Council has established an efficient and cost-effective system for the determination of licences as recommended in the s.182 Guidance.
79. Where matters are subject of representations, the licensing service will normally attempt to reach a negotiated conclusion through a conciliation process. This service is provided to help develop workable agreed outcomes supported by all parties, which will also save the time and costs associated with holding a public hearing. Conciliation can be agreed up until 24 hours before a hearing takes place. Where this is not possible the application and representations to it will be considered by the Sub-Committee at a public hearing.
80. Table 1 below sets out the schedule of delegation of decisions and functions to the Licensing Committee, Sub-Committees and Officers.

Table 1 – Table of delegations of licensing functions			
Matter to be determined	Full Committee	Sub-Committee	Officers
Licensing policy	& Council Assembly		
Personal licence		If a Police or Secretary of State objection made	If no objection is made
Personal licence with unspent convictions		All cases	
Personal Licence where convicted of any relevant offence or foreign offence, or required to pay an		When the Authority becomes aware	
Premises licence / club certificate		If a relevant representation is made and not conciliated	When no relevant representation / all concerns conciliated
Provisional statement		If a relevant representation is made and not conciliated	If no relevant representation
'Major' variation of a premises licence / club premises		If a relevant representation is made and not conciliated	If no relevant representation
'Minor' variation of a premises licence / club premises			All cases
Variation of the designated premises supervisor		If a Police or Secretary of State objection made	All other cases

Request to be Removed as a designated premises supervisor			All cases
Transfer of premises licence		If a Police or Secretary of State	All other cases
Interim authority		If a Police or Secretary of State	All other cases
Review of a premises licence /		All cases	
Whether a representation is irrelevant,			All cases
Temporary event notice		If Police or Environmental Health objection is made	If no representation received.
Variation of a premises licence in respect of a community premises to include		If a Police objection	All other cases
Decision whether to consult other Responsible Authorities on minor variation application			All cases

Licence reviews

81. At any stage following the grant of a premises licence, a Responsible Authority, other persons, residents or businesses or a representative of these may ask the Authority to review a premises licence because of a concern about the premises in connection with any of the four licensing objectives.
82. In addition, a review of the licence will normally follow any action by the Police to close down a premises for up to 24 hours on grounds of disorder or nuisance, as a result of a magistrates' court direction sent to the Licensing Authority. A licence review can have several outcomes: modification of the conditions of the premises licence; exclusion of a licensable activity from the scope of the licence; removal of the designated premises supervisor from the licence; suspension of the licence for a period not exceeding 3 months or revocation of the licence.
83. Where a review of a premises licence is sought, this must relate specifically to an individual premises. The Licensing Authority may also reject an application made by an interested party if it determines that the ground for the review is repetitious, that it is substantially similar to an earlier review, following which a "reasonable interval" (i.e. 12 months according to statutory guidance) has not elapsed since the earlier application or since the grant of the premises licence.
84. Any evidence relied upon for a review (or any submitted representation) must be supplied to all parties within the consultation period. Any supplementary evidence following that period must be supplied at least 24 hours before the Hearing. It is the responsibility of the person bringing the review, or making a representation, to ensure that any supporting evidence (written or visual) is in an acceptable and usable format that can be circulated to all Responsible Authorities, the licence holder and any other interested parties. Evidence supplied should be complete at the point that it is submitted, with no expectation that the Council will add to their evidence or produce evidence from previous complaints or applications.

Applications for transfer of a premises licence following application for a review

85. This Authority is concerned over the frequently observed practice of an application for a transfer of a premises licence being made following an application for a review of that same licence being lodged.
86. Where, such applications are made, this Authority will require documented proof of transfer of the business / lawful occupancy of the premises (such as a lease), to the new proposed licence holder to support the contention that the business is now under new management control.

Annual fee payments

87. An annual maintenance fee is payable in respect of all premises licences and club premises certificates. If the annual fee is not paid when it is due, the Authority must suspend the licence or certificate. In such cases, the holder of the licence will be notified in writing, giving at least two working days' notice of the suspension date. Once suspended, the licensable activity authorised by that licence must cease. The Police and other Responsible Authorities will be informed, and monitoring checks will be made to ensure no licensable activity continues.
88. The suspension ends upon payment of the fee. Licence holders should ensure that the payment of the outstanding fee is brought to the attention of the licensing service in order that the suspension may be lifted.

Other regimes

89. This Authority will look to ensure consistency, as far as is possible within law, with other licensing and consent regimes.
90. In respect of 'agent of change', this has been referred to in the s.182 guidance at para 14.67: *".... Existing businesses and facilities should not have unreasonable restrictions placed on them as a result of development permitted after they were established. Where the operation of an existing business or community facility could have a significant adverse effect on new development (including changes of use) in its vicinity, the applicant (or 'agent of change') should be required by the local planning authority to provide suitable mitigation before the development has been completed."* [Revised guidance issued under section 182 of the Licensing Act 2003 \(November 2025\) \(accessible version\) - GOV.UK](#)
91. Further information on planning is available on the Council website at [Planning and building control for businesses | Southwark Council](#)
92. The planning, regeneration, building control and licensing regimes will be properly separated. To avoid duplication and inefficiency. Each regime involves consideration of different (albeit related) matters. Neither the Licensing nor the Planning Committees are bound by decisions made by the other.

93. This authority will not consider the issue of “need” in determining any licence application is a matter for planning control and the market. The Council will not impose quotas of premises or licences under the licensing regime.
94. When, as a condition of planning permission, the terminal hour has been set for the use of premises for commercial purposes differs from the permitted licensing hours, the Applicant must observe the earlier closing time. Premises operating in breach of their planning permission would be liable to prosecution under planning law.
95. This Authority notes and Guidance supports ‘that where businesses have indicated, when applying for a licence under the 2003 Act, and they have also applied for planning permission or that they intend to do so’,³ the Licensing Sub-Committee and Officers may consider discussion with their planning counterparts prior to determination with the aim of agreeing mutually acceptable operating hours and scheme designs” are in place. Contact details for obtaining Planning Consent or a Highway’s Table and Chairs Licence and applying for the use of a park are in Appendix A under other agencies.

³ Statutory Guidance November 2025 para 9.45 [Revised guidance issued under section 182 of the Licensing Act 2003 \(November 2025\) \(accessible version\) - GOV.UK](#)

Chapter 5 - DETERMINING APPLICATIONS FOR PREMISES LICENCES AND CLUB PREMISES CERTIFICATES

96. All applications for new premises licences or variations need to be supported by an operating schedule. The schedule must clearly establish the steps the Applicant proposes to promote the licensing objectives.
97. If an application for a premises licence or club premises certificate has been made lawfully and there have been no representations from Responsible Authorities or other persons, the Licensing Authority must grant the application in the terms sought, subject only to the relevant mandatory conditions and conditions that are consistent with the operating schedule. The Licensing Authority will have no discretion to refuse the application or to alter or add to the conditions arising from the operating schedule.
98. If relevant representations are received, then (unless the concerns raised are resolved through conciliation) a hearing of the application by the Licensing Sub-Committee will normally follow. At the hearing, each application will be considered upon its own merits with all relevant matters taken into account.
99. Having had regard to all relevant matters, the Sub-Committee will take such steps as it considers appropriate to promote the licensing objectives. This may include the refusal or part grant of the application, or adding to or modifying the conditions proposed in the operating schedule.
100. In exercising its discretion, the Licensing Sub-Committee will have regard (amongst other things) to the content of this licensing policy. Therefore, Applicants are advised to read the content of this policy carefully before drawing up their operating schedule. Where an operating schedule complies with this policy, it is generally less likely that a Responsible Authority or other person will object to it, or that any representation will succeed. Therefore, compliance with this policy is likely to assist the Applicant to avoid the delay and expense of a contested licensing hearing, and risk refusal of the application or the addition of unwanted conditions.
101. This is not to say that an opposed application which complies with the policy will necessarily be granted or that an opposed application which does not comply with it will necessarily be refused. Where there have been relevant representations, the Licensing Authority will always consider the merits of the case, and interfere with the operating schedule only when, and to the extent, considered appropriate to promote the licensing objectives. So, for example, following receipt of relevant representations, the Licensing Authority will not interfere with an operating schedule which does not comply with this policy where the steps proposed are sufficient to meet the licensing objectives in the individual circumstances of the case.
102. However, the policy represents the Licensing Authority's view of the best means of securing the licensing objectives in most normal cases. It has been drawn up in consultation with other expert bodies and Responsible Authorities, together with input from business operators and community stakeholders. While the contents of the operating schedule are a matter for the Applicant, in cases where there is objection to a schedule which departs from the policy, the licensing Sub-Committee hearing the opposed application will normally expect to be given good reason for the departure if it is to be asked to make an exception to the policy.
103. In this policy, there are a number of references to the Licensing Authority's expectations of Applicants. As explained, the policy is only engaged where the Licensing Authority has a discretion following the receipt of representations. In such cases, the Licensing Authority will

not apply the policy rigidly, but will always have regard to the merits of the case with a view to promoting the licensing objectives.

104. One particular expectation of Applicants is that they conduct a risk assessment in relation to the licensing objectives before completing an operating schedule. It is emphasised that there is no statutory requirement for this under the Licensing Act 2003. However, where no such risk assessment has been conducted, then if there are relevant representations leading to a hearing, the Licensing Sub-Committee may take a more precautionary approach than if the Applicant can demonstrate that a particular risk has been properly evaluated and either discounted or mitigated in the operating schedule.

Location and other relevant considerations

105. In considering applications for new licences, variations of existing licences and licence reviews, this Authority will take the following matters into account:
 - Whether the premises is located within a current Cumulative Impact Area;
 - The type and mix of premises and their cumulative impact upon the local area;
 - The location of the premises and their character;
 - The views of the Responsible Authorities and other persons;
 - The past compliance history of the current management;
 - The proposed hours of operation;
 - The type and number of customers likely to attend the premises;
 - Whether the Applicant can demonstrate commitment to a high standard of management, for example, through the level of consideration given to the promotion of the licensing objectives; by active participation in Pub-Watch, Ask for Angela/Ask for Clive and adopting the Women's Safety Charter;
 - The physical suitability of the premises for the proposed licensable activities, i.e. in terms of safety, access, noise control, etc.
106. Applicants should refer to Appendix B of this policy for details of the current local Cumulative Impact Areas and, also, consider the general operating hours in Chapter 7 of this policy. Applicants should not try to replicate later operating hours even if there are other premises nearby that currently operate for longer. This Authority will carefully balance the conflicting needs of residents, patrons and businesses in relation to the introduction of premises and flexible opening hours for the sale and supply of alcohol and late-night refreshment.

High standards of management

107. When assessing the Applicant's or Licensee's ability to demonstrate a commitment to high standards of management this Authority will consider whether the Applicant or Licensee:
 - Has researched the local area and can demonstrate understanding of local community concerns;
 - Has carried out relevant risk assessments and devised an appropriate strategy to promote the licensing objectives;
 - Can demonstrate comprehensive knowledge of best practice;
 - Has sought advice from the Responsible Authorities;
 - Has implemented any advice given by Responsible Authorities;
 - Is able to understand verbal and written advice and legal requirements;

- Can demonstrate knowledge of the licensing objectives, relevant parts of the licensing policy and their responsibilities under the 2003 Act;
- Is able to run their business lawfully and in accordance with good business practices;
- Is able to demonstrate a track record of compliance with legal requirements.

Mandatory conditions

108. There are a number of mandatory conditions set out within the Act (as amended by the Mandatory Licensing Conditions (Amendment) Order 2014. The mandatory conditions must be imposed upon all licences where relevant.

Other conditions

109. Conditions on a premises licence or club premises certificate are important in setting the parameters within which premises can lawfully operate. This Authority will aim to ensure that conditions attached to licences will:

- 1) Be appropriate for the promotion of the licensing objectives;
- 2) Be precise and enforceable;
- 3) Be unambiguous and clear in what they intend to achieve;
- 4) Not duplicate other statutory requirements or other duties or responsibilities placed on the employer by other legislation unless extending circumstances have demonstrated multiple breaches of that legislation and the condition/s are to prevent further breaches;
- 5) Be tailored to the individual type, location and characteristics of the premises and events concerned;
- 6) Not be standardised;
- 7) Not replicate offences set out in the 2003 Act or other legislation;
- 8) Be proportionate, justifiable and capable of being met;
- 9) Not seek to manage the behaviour of customers once they are beyond the direct management of the licence holder and their staff (but may impact upon the behaviour of customers in the immediate vicinity of the premises or as they enter or leave);
- 10) Be written in a prescriptive manner.

(conditions link - TBC]

Shadow licences

110. The Licensing Authority may consider granting applications for licences that duplicate the terms and conditions of the current operational licence for the same premises but are issued to the landowner or another person with an interest in the property. These 'Shadow Licences' are usually sought by landowners to protect their property interests due to policies that may refuse certain new applications. Such licences will be subject to a condition that prohibits its use whilst another licence is in place. A Shadow Licence will, in the event that a licence lapses, is surrendered or revoked (and incapable of being resurrected under the Act); shall require the holder of the licence to submit an application to the Licensing Authority to vary the Shadow Licence to remove any conditions preventing the use of the licence.
111. The Licensing Authority recognises that there is no restriction in the Licensing Act 2003 for there to be more than one licence to be in effect at any one time at the same premises to promote the licensing objectives and provide clarity as to which premises licence is being used to provide licensable activities. Conditions may be added to the additional premises licence application.

Chapter 6 - CUMULATIVE IMPACT AREAS (CIAs)

112. In areas where the number, type or density of licensed premises high, particularly those selling alcohol or providing late night refreshment serious problems of nuisance and disorder may arise outside or some distance from those premises
113. This concentration of customers when leaving premises or when queuing at fast food outlets or public transport, problems of nuisance and disorder may arise outside or some distance from those premises/locations
114. These concentrations of people may also attract criminal activities such as drug dealing, pickpocketing and street robbery, whereby local services, i.e. policing, public transport services, public lavatory provision and street cleaning, may not be able to meet the immediate demand
115. The cumulative impact of licensed premises on the promotion of the licensing objectives is a proper matter for a Licensing Authority to consider within its licensing policy and is now included in s.5a Licensing Act 2003
116. Applications made within specified Cumulative Impact Areas (CIAs) are therefore deemed likely to add to the potential impact the CIA is intended to avoid. Therefore, under this policy, there is an automatic presumption that such applications will be refused; however, each application must still be judged on its own merits
117. It is normally the case that a representation citing a relevant CIA will have to be determined at a Licensing Sub-Committee hearing. The Applicant should therefore expect to have to attend a hearing regarding their application from the outset
118. This Authority expects all applicants to be able to demonstrate their understanding reasons for the CIA, highlighting those reasons and mitigating those within their operating schedule.

Those areas subject to the CIA can be found in **Appendix B**.

Early morning restriction orders (EMRO)

119. There are no EMROs in Southwark at the time of writing this policy; however, this Authority may introduce an EMRO if it feels it is 'appropriate' for the promotion of any of the licensing objectives.

Late Night Levy

120. The Late Night Levy is a discretionary power, which this Council adopted in 2019 ⁴ to assist Local Authorities and the Police to manage and improve the night-time economy.
121. The levy allows the Council to charge a fee (set nationally by the government) based upon the ratable value of premises that hold a premises licence or Club premises certificate to sell/supply alcohol between 00:01 and 06:00. This charge applies whether these licensed hours are used or not and is dependent on the ratable value of the premises, and the amounts of levy are set by the government.

⁴ [Notice of proposal to introduce a late night levy in the London Borough of Southwark | Southwark Council](#)

Exemptions from the levy

122. The following premises are allowed an exemption:

- a) Premises with overnight accommodation which have no facilities to serve alcohol to non-residents.
- b) Theatres and cinemas. where the sale of alcohol is for ticket holders for that event or participants in the production, and their invited guests.
- c) Bingo Halls licensed under the Gambling Act, where live bingo is the primary function.
- d) Community Amateur Sports Clubs. Currently registered with CASC & HMRC.
- e) Community premises that have successfully applied for the replacement of the mandatory 'designated premises supervisor' licence condition.
- f) Businesses participating in a qualifying Business Improvement District where there an existing BID levy is to promote the reduction or prevention of late-night disorders.
- g) New Year's Eve premises. This applies to premises which are not authorised to sell/supply alcohol between 00:00 (midnight) and 06:00 except on New Year's Day ONLY.

Reduction

123. The Council may decide that a where a Levy is in effect, a reduction of 30% of the levy payable may be offered to all premises selling alcohol and providing late night refreshment between 00:00 (midnight) and 06:00.

Chapter 7 – HOURS OF OPERATION

Licensing hours

124. Prior to the introduction of the Licensing Act 2003, the Government believed that fixed and artificially early closing times were one of the key causes of both rapid binge drinking prior to closing times and of disorder and disturbance when large numbers of customers were simultaneously required to leave licensed premises. An aim was to reduce the potential for concentration of customers from licensed premises and achieve a slower dispersal of people through flexible opening times.
125. Current Guidance now states that the Government acknowledges that different licensing approaches may be appropriate for the promotion of the licensing objectives in different areas. The 2003 Act gives the Licensing Authority power to make decisions regarding licensed opening hours as part of its implementation of the licensing policy and Licensing Authorities are best placed to make such decisions based on local knowledge and in consultation with other Responsible Authorities.
126. This Authority recognises the increase in the number of premises licensed for the sale or supply of alcohol since the introduction of the 2003 Act and, particularly, the increase in the number and density of such premises within the night-time economy. In such a densely populated borough as Southwark, where there is often little demarcation between residential and commercial areas, the potential for late operating venues and businesses to cause nuisance and disturbance to local residents is considerable. Therefore, there will be no presumption in favour of lengthening licensing hours. The four licensing objectives should always be paramount considerations.
127. Table 2 (page 32) provides a guide for Applicants when preparing their operating schedules as to the hours of operation that this Authority might consider appropriate by type of premises and (planning) area classification. These hours are not pre-determined, and each application will be considered on its own merits.
128. You can check to see the recommended hours in a particular area by using Southwark Maps: <https://geomap.southwark.gov.uk/connect/analyst/mobile/#/login?mapcfg=%2FAnaly%20st%2FNamedProjects%2FSouthwark%20licencing%20areas>
129. However, Applicants for licences incorporating hours that fall outside of the guidance offered are expected to explain fully within their application the arrangements intended to be put in place to ensure that the premises do not add to the cumulative impact, or to disturbance and/or disorder in the area late at night. Applicants who wish to provide licensable activities outside the hours specified should ensure that the operating schedule specifies detailed measures to mitigate against crime, disorder and public nuisance, taking into account the following:
 - 1) The location of the premises and the character of the local area.
 - 2) The proposed hours during which the licensable activities are proposed to take place.
 - 3) The adequacy of the proposed control measures intended to promote the licensing objectives.
 - 4) The availability of local public transport.
 - 5) The proximity of the premises to other licensed premises of a similar nature and the hours of operation of those premises.

130. Operating schedules with insufficient detail are more likely to be refused, have limitations in hours applied, or have additional conditions imposed upon them by the Licensing Sub-Committee. The Licensing Authority may impose further limitations in hours upon review of the licence, particularly where the premise is shown to be the focus or cause of nuisance or anti-social behaviour.
131. Applicants should note that where applications relate to premises that are located within more densely populated areas, stricter controls with regard to noise control may be necessary. For guidance, please see Chapter 8 on the prevention of public nuisance.

Table 2 = Recommended Licensable Hours

Type of premises	Hours	Major Town Centres and Strategic Cultural Area	District Town Centres	Local Centres and Small Shopping Parades	Residential / Mixed Use areas
		• Bankside and Borough • London Bridge • Canada Water • Elephant and Castle (including Walworth Road) • Peckham • St Mary's Churchyard (Rotherhithe)	• Camberwell • Herne Hill Lordship Lane <i>Note: Borough and Bankside, and London Bridge are also classified as District Town Centres. However, they have dual categorisation as Strategic Cultural Areas; therefore, the latter hours apply</i>	• The Blue Dulwich Village • Nunhead • Forest Hill Road • Great Suffolk Street • Southampton Way • Southwark Park Road	All other <i>We recognise that certain areas within the borough are not residential, and all such applications will be determined on their individual merits</i>
Restaurants and cafes	Start Time	No specified start time. Applicants are required to specify this in their application			
	End Time	Sun to Thurs: 00:00 Fri to Sat: 01:00	Sun to Thurs: 00:00 Fri to Sat: 0:100	Sun to Thurs: 23:30 Fri to Sat: 00:30	23:00 daily
Public houses, wine bars, or other drinking establishments and bars in other types of premises	Start Time	Mon to Sun: 11:00	Mon to Sun: 11:00	Mon to Sun: 11:00	Mon to Sun: 11:00
	End Time	Sun to Thurs: 23:00 Fri to Sat: 00:00	Sun to Thurs: 23:00 Fri to Sat: 00:00	Sun to Thurs: 23:30 Fri to Sat: 00:00	23:00 daily
Hotel bars and guest houses	Start Time	No restrictions for hotel residents			
	End Time	No restrictions for hotel residents			
Night clubs (with 'sui generis')	Start Time	Mon to Sun: 11:00	Mon to Sun: 11:00	Not considered appropriate	Not considered appropriate

planning classification)	End Time	Mon to Thurs: 01:00 Fri to Sat: 06:00 Sun: 00:00	Sun to Thurs: 00:00 Fri to Sat: 01:00	Not considered appropriate	Not considered appropriate
Off-licences and alcohol sales in grocers and supermarkets	Start Time	Mon to Sun: 11:00	Mon to Sun: 11:00	Mon to Sun: 11:00	Mon to Sun: 11:00
	End Time	00:00 (midnight) daily	00:00 (midnight) daily	00:00 (midnight) daily	00:00 (midnight) daily
Take-away premises LNR	A licence is required between 23:00 and 05:00 for the sale of hot food and/or hot drinks. Outside of these times is not a licensable activity under the Licensing Act 2003				
	End Time	Sun to Thurs: 00:00 Fri to Sat: 01:00	Sun to Thurs: 00:00 Fri to Sat: 01:00	Sun to Thurs: 23:00 Fri to Sat: 00:00	Not considered appropriate
Cinemas and theatres	Start Time	No specified start time. Applicants are required to specify this in their application			
	End Time	02:00 daily	01:00 daily	00:00 (midnight) daily	23:00 daily
Vessels	Start Time	No specified start time. Applicants are required to specify this in their application			
	End Time	23:00 daily	23:00 daily	23:00 daily	23:00 daily
Qualifying members' clubs	Start Time	No specified start time. Applicants are required to specify this in their application.			
	End Time	02:00 daily	01:00 daily	00:00 (midnight) daily	23:00 daily
Event premises/ spaces where the sale of alcohol is included but ancillary to a range of activities, including meals	Start Time	Monday to Sunday: 11:00 (inclusive of Bank Holidays)			
	End Time	Sun to Thurs: 00:00 Fri to Sat: 01:00	Sun to Thurs: 00:00 Fri to Sat: 01:00	Sun to Thurs: 00:00 Fri to Sat: 01:00	23:00 Daily

132. It should be noted that there are three areas which are strategic cultural areas (SCA) that are situated outside a major town centre, two fall part of the Borough and Bankside SCA and a third area in Rotherhithe, these are listed below:

- 1) Shad Thames area bounded by Tower Bridge Road, Tooley Street, St. Saviours Dock and the River.

- 2) Triangle area bounded by Bermondsey Street, Tower Bridge Road and the Railway.
 - 3) St Mary's Churchyard area, Rotherhithe.
133. It is recognised that these areas, although of mixed use, have a high residential usage and consideration for the later hours beyond those recommended for a residential area should be accompanied by evidence that the proposal is intended to enhance the provision of arts, culture and tourism in the area.
134. For premises that do not fall within one of the types of premises listed the on sale of alcohol shall be considered to fall within the premises type for a bar, some examples may be breweries with a tap room for on sales of alcohol, a hotel bar for non- residents, a bar or supply of alcohol in an office/workspace and event spaces which does not fall into the event premises/space category.
135. Similarly for types of premises that sell off sales of alcohol but do not fall within one of the listed categories shall be considered to fall within the premises type for an off-licence, for instance "petrol stations," where the restriction to sell alcohol under section 106 of the Licensing Act 2003 does not apply, the premises may be considered as predominately being a grocers.
136. Where the sale of alcohol is not considered the primary activity of the premises, then it is appropriate to condition the sale of alcohol as ancillary to the primary activity, for instance, to qualify for the restaurant hours, alcohol should be mainly ancillary to the provision of food.
137. For the purpose of this policy, the following area classifications have been made:
- 1) **Major Town Centres and Strategic Cultural Areas** – Bankside and Borough, London Bridge Canada Water, Elephant and Castle (including Walworth Road), Peckham, St Mary's Churchyard (Rotherhithe)
 - 2) **District Town Centres** – Camberwell, Herne Hill and Lordship Lane.
(*Note: Borough and Bankside, and London Bridge are also classified as District Town Centres. However, they have dual categorisation as Strategic Cultural Areas; therefore, the latter hours apply.*)
 - 3) **Local Centres and Small Shopping Parades** – The Blue, Dulwich Village, Nunhead, Forest Hill Road, Great Suffolk Street, Southampton Way, Southwark Park Road
 - 4) **Residential / Mixed Use** – All other.

Chapter 8 – LICENSING OBJECTIVES

THE PREVENTION OF CRIME AND DISORDER

138. The Council recognises that well run licensed premises can make a valuable and positive contribution to the local community through the local economy, tourism, and cultural development. Southwark also has a duty under the Crime and Disorder Act 1998 to make reasonable actions to prevent crime and disorder.
139. However, poorly managed licensed premises, especially those offering late night alcohol and/or entertainment, or late-night refreshment for large numbers of people, can become a serious source of crime and disorder or anti-social behaviour.
140. This Authority expect Applicants for premises licences and club premises certificates to have made relevant enquiries about the local area and prepare their operating schedule on the basis of a risk assessment of the potential sources of crime and disorder associated with the premises operation. The operating schedule should demonstrate an understanding of the level of risk of crime and disorder and include positive proposals to manage any potential risk.

Relevant issues might include (but not limited to):

- 1) Anti-social behaviour;
 - 2) Drunkenness on the premises;
 - 3) Public drunkenness;
 - 4) Violent behaviour;
 - 5) The possession of weapons;
 - 6) Drugs use;
 - 7) Underage drinking;
 - 8) Theft of personal property;
 - 9) Trafficking and illegal workers;
 - 10) Prostitution, lewd acts and similar offences;
 - 11) Child sexual exploitation;
 - 12) Harassment;
 - 13) Counterfeit goods;
 - 14) Non-duty paid goods and tax evasion;
 - 15) Maintenance of smoke-free environments, including shisha bars.
141. Applicants are recommended to seek advice from the Council's Licensing Team, the Police and Trading Standards when carrying out their risk assessments and in preparing their operating schedules.
 142. Southwark is committed to supporting the Mayor of London's Women's Night Safety Charter (WNSC) ⁵ together with those schemes aimed at protecting the vulnerable participating in the night-time economy and profiled at Appendix C.

Door Supervision

143. Door supervisors will often play an important key role in ensuring that well managed premises are free from crime and disorder and nuisance problems. A reminder is given that

⁵ [Women's Night Safety Charter | London City Hall](#)

where a premises licence (other than for plays or films) includes a condition that at specified times there must be persons employed for the purposes of security; protection; screening the suitability of persons entering premises; or dealing with conflict in pubs, clubs and other licensed premises open to the public, then such persons must be registered with the Security Industry Authority (SIA). In any event it is in operator's own interests to ensure that all security staff employed, whether under contract or employed in-house are so licensed, since the operator may be legally liable for their actions. Licensed door supervisors will have undergone an identity and criminal record check and have received suitable training. It is recommended that employers should consider using only SIA approved contractors to source.⁶

The sale and possession of smuggled, bootlegged or counterfeit products and the handling of stolen goods

144. Any holder of a premises licence, designated premises supervisor, any member of staff or club officer where a club premises certificate is granted, user of a premises for which a Temporary Event Notice is currently permitted or, any person carrying out paid or unpaid work at such premises, knowingly keeps or allows to be kept on those premises, any goods which have been imported without payment of duty or which have otherwise been unlawfully imported commits a criminal offence within this act. To prevent these offences from occurring, the licensee is expected to carry out its necessary due diligence. It should be noted that on conviction for offences relating to counterfeit products, confiscation for the proceeds of crime may be sought by the Council. Advice on this can be obtained from the Council's Trading Standards Service.

Theft of personal property

145. Important steps that can be taken to reduce the risk of theft of personal property include:

- 1) Raising the level of awareness among customers of the risk of theft of personal property through crime prevention information. This is especially important within premises where there is a high level of transient tourist trade.
- 2) Provide controlled cloakroom areas;
- 3) Provide Chelsea clips under tables;
- 4) Ensure all areas of the premises are well lit and able to be observed by staff.
- 5) Direct staff to observe the customer areas and politely raise with customers when personal belongings are left unattended;
- 6) Provide and publicise internal CCTV;
- 7) Ensure adequate staffing levels and provide appropriate staff training.

Adult Entertainment

146. The Licensing Authority, along with the Responsible Authorities, have concerns that the licensing objectives are engaged by the operation of premises where nudity, partial nudity or adult entertainment of a sexual nature is carried out. Applicants are required to state in their Operating Schedule that they propose to offer nudity, partial nudity or adult entertainment of a sexual nature.

⁶ [Security Industry Authority - GOV.UK](https://www.gov.uk/government/organisations/security-industry-authority)

PUBLIC SAFETY

147. Licence holders have a responsibility to ensure the safety of those using their premises, under the Licensing Act 2003. This responsibility extends to other regulatory regimes requiring managers and employees to be vigilant to risk; dynamically assessing the risks to prevent accidents and injuries due to structure, design and maintenance. With due consideration given to the events promoted on those premises where alcohol consumption and vulnerable customer mix.
148. Licensable activities may take place within a broad range of premises: cinemas; theatres concert halls; night-clubs, bars and public houses; restaurants and cafes fast food outlets.; supermarkets, off-licences. Each of these types of operation potentially presents a mixture of risks common to most premises. Others are unique to specific operations it is essential that premises are constructed or adapted, configured and managed in a manner which acknowledges these risks and safeguards occupants against them. Fire prevention and evacuation guidance documents is made available for each type of premises and operation.
149. This Authority is committed to ensuring the safety of people visiting and working in licensed premises. This Authority expects all applicants for premises licenses and club premises certificates to be able to demonstrate their understanding of the risks and hazards attributed to their premises, operation, venue style and customer base by highlighting those risks and mitigation within their operating schedule.
150. A number of matters should be considered in relation to public safety. These may include:
 - 1) Premises configuration and site layout arrangements including adequate means of escape and signage;
 - 2) Fire safety;
 - 3) Emergency systems;
 - 4) Temporary structures;
 - 5) Ensuring appropriate access for emergency services, such as ambulances;
 - 6) Good internal and external communication systems, including with Local Authorities and emergency services (for example, communications networks with the Police and signing up for local resident incident alerts);
 - 7) Ensuring the presence of trained first aiders on the premises and appropriate first aid kits;
 - 8) Hygiene and welfare facilities;
 - 9) Special installations and special effects;
 - 10) Ensuring the safety of people when leaving the premises (for example, through the provision of information on late night transport);
 - 11) Ensuring appropriate and frequent waste disposal, particularly of glass and bottles;
 - 12) Ensuring appropriate safe limits on the maximum capacity of the premises;
151. Statutory guidance advises applicants to seek advice from the Council's Health and Safety Team and/or local fire safety Officers before submitting any application. (see contact details in Appendix A of this document)
 - 1) Model National and Standard Conditions for Places of Public Entertainment and Associated Guidance ISBN 904031 11 0 (Entertainment Technology Press – ABTT Publications).

- 2) The Event Safety Guide - A guide to health, safety and welfare at music and similar events (HSE 2002) ("The Purple Book") ISBN 0 7176 2453 6.
- 3) Managing Crowds Safely – A Guide for Organisers of Events and Venues (HSE 2000) ISBN 0 7176 1834 7.
- 4) 5 Steps to Risk Assessment: Case Studies (HSE 1998) ISBN 07176 15804.
- 5) The Guide to Safety at Sports Grounds, Published by the Safety at Sports Grounds Authority ("The Green Guide") 2007 ISBN 9780117020740.
- 6) Fire Safety Risk Assessment – "Open Air Events and Venues" (ISBN 978 1 85112 823 5), which is available from the Communities and Local Government website www.communities.gov.uk/fire
- 7) Technical Standards for Places of Public Entertainment 2013 – The Association of British Theatre Technicians; The Chartered Institute of Environmental Health; The District Surveyors' Association; and The Institute of Licensing.
- 8) Safer Clubbing - Produced by the Home Office in conjunction with the London Drugs Policy Forum.

The following British Standards should also be considered.

- 9) BS 5588 Part 6 (regarding places of assembly);
- 10) BS 5588 Part 9 (regarding ventilation and air conditioning systems);
- 11) BS5588 Part 9 (regarding means of escape for disabled people);
- 12) BS 5839 (fire detection, fire alarm systems and buildings);
- 13) BS 5266 (emergency lighting systems).

PREVENTION OF PUBLIC NUISANCE

152. This Authority expects Applicants for premises licences and club premises certificates to have made relevant enquiries about the local area, recognising the impact their operation may have on the neighbourhood, through light pollution, noxious smells, or noise escaping from premises or their outdoor areas. Particular consideration must also be given when patrons congregate outside awaiting entry, and similarly as they leave the venue awaiting transport home.
153. This Authority expects all applicants for premises licenses and club premises certificates to be able to demonstrate their understanding of the likelihood of the environmental impact on the community through their operation, highlighting those risks and the mitigation required and put in place within their operating schedule.
154. Relevant considerations might include:
 - Preventing disturbance caused by patrons upon arrival, when queuing or being admitted to the premises, while congregating outside the premises, or upon departure. This particularly (though not exclusively) between 22:00 and 08:00;
 - The provision of adequate parking arrangements for customers, preventing illegal parking and obstruction of emergency and other vehicles;
 - The prevention of queues of traffic forming outside the premises;
 - The availability of alternative public transport and local provision for licensed taxis or private hire vehicles, including arrangements to ensure their use does not cause disturbance to local residents;
 - The use of public transport/active travel should be positively encouraged;

- Preventing noise and vibration escaping from the premises, including from music played upon the premises, public address systems, and customer noise;
 - Preventing nuisance from the positioning and operation of plant and machinery such as kitchen extraction systems, ventilation plant, condensers, etc.;
 - The need for regular patrols of the boundary of the premises and/or at the nearest residential points to ensure nuisance impacts are not being experienced by neighbours;
 - Controlling disturbances that may be caused by the use of external areas. This should include gardens and terraces as well as other open-air areas, including the highway (particularly in relation to the smoking ban and passage of patrons between internal and external areas);
 - Arranging clear-up operations conducted by staff so they do not cause a nuisance and controlling staff departures;
 - Restricting delivery and collection times (waste, equipment and consumables) to between 08:00 and 20:00;
 - Limiting any nuisance or glare caused by the positioning of external lighting, including security lighting;
 - Preventing odour or pests from refuse storage and waste disposal, and the accumulation of litter and smokers waste in the vicinity of the premises;
 - Preventing odour from food preparation and having adequate kitchen extraction systems in place.
155. Applicants are recommended to seek advice from the Council's Environmental Protection Team when preparing their operating plans and schedules. Where relevant, Applicants are also advised to refer to:
- 1) The Institute of Acoustics "Good Practice Guide on the Control of Noise from Pubs and Clubs";
 - 2) Noise at Work Guidance for employers on the Control of Noise at Work Regulations 2005 issued by the Health and Safety Executive and obtainable from [Noise at work: A brief guide to controlling the risks INDG362](#) ;
 - 3) In the case of large music events, the Code of Practice on Environmental Noise Control at Concerts produced by the Noise Council, together with Southwark Events Team policies;
 - 4) Guidance on the Control of Odour and Noise from Commercial Kitchen Exhaust Systems produced by EMAQ (2018) ;
 - 5) Guidance Notes for the Reduction of Obtrusive Light – Institute of Lighting Engineers (2005);
 - 6) Southwark's Environmental Protection Team's Technical Guidance for Noise (2017).

Outdoor events/other large events

156. Each year, Southwark hosts a large number of outdoor community events. These events add to the vibrancy of the Borough and are enjoyed by both residents and visitors alike. It is important that such events are organised and managed to ensure that minimum disturbance is caused to people living and working nearby.
157. Applicants should follow the guidance for all premises licence applications and must consult with Southwark's Events Team early in the planning process for any event and submit an 'Event Management Plan' to the Council's Environmental Protection Team with their application.

158. Responsible Authorities will assess all licence applications for their impact with regard to public nuisance. Nuisance from outdoor events can be created by many activities, for example:
- Set up rigging / de-rigging;
 - Vehicle movements on and around the site;
 - Patrons congregating and dispersing;
 - Parking arrangements;
 - Music and entertainment;
 - Fireworks and special effects;
 - Smoke;
 - Odour from concessions or open food preparation;
 - Lighting;
 - Operation of plant and machinery (including generators, etc.);
 - Litter.
159. This Authority expects all event organisers to include a 'nuisance management plan, be able to demonstrate their understanding of the likely impact on the community through their operation, highlighting those risks and the mitigation required to be put in place within that event management plan.
160. The nuisance management plan should include the following information:
- Location and site plan;
 - Date/hours of operation. It is suggested that a finishing time of 22:00 is appropriate; however, an earlier finish time may be requested, subject to local circumstances;
 - Information on the type of event, with programme and timetable;
 - Orientation of any stage(s), marquees or potential sources of noise;
 - Plans for access to and from the site and site routes within the event perimeter;
 - Location of operational plant and vehicles;
 - Background noise survey and predictive noise assessment;
 - Details of event and stage management structure, including names and contact details for persons responsible for liaison with Council and other Enforcement Officers at the event; for management of sound systems; recording of noise levels; dealing with complaints and keeping records of and remedial actions; and attending pre-event and post-event audit meetings with the Authority;
 - Details of noise control measures:
 - Sound limiting technology to be used.
 - Maximum noise/bass levels.
 - Selection of equipment, etc.
 - Location of light sources and light impact assessment;
 - Litter control, waste management and recycling provisions;
 - A copy of the pre-event information leaflet to be dropped to occupiers of nearby noise sensitive premises.
161. Licensees should be aware that a range of other consents may be necessary to provide smoking shelters or space heaters, awnings, tables and chairs, metal or rope barriers or 'A' boards on the highway. Please discuss your proposals with the Licensing Team in the first instance (see Appendix A for contact details).

THE PROTECTION OF CHILDREN FROM HARM

162. The protection of children from harm includes the protection of children from moral, psychological and physical harm. This includes not only protecting children from the harms associated with alcohol but also wider harms such as exposure to strong language and sexual expletives (for example, in the context of exposure to certain films or adult entertainment). Licensing Authorities must also consider the need to protect children from sexual exploitation when undertaking licensing functions.
163. This Authority expects Applicants for premises licences and club premises certificates to have prepared their operating schedule on the basis of a risk- assessment of the potential sources of harm to children. It is expected that the operating schedule will demonstrate an understanding of the potential risks to children and set out the steps to be taken to protect children from harm when on the premises.
164. Relevant considerations might include (but not limited to):
 - 1) Preventing access to alcohol and other age-restricted products;
 - 2) Removing encouragement for children to consume alcohol;
 - 3) Preventing exposure to gaming;
 - 4) Preventing exposure to adult entertainment or facilities.
165. Applicants are advised to seek advice from the Southwark Children's Social Care Services when preparing their operating plans and schedules. Southwark Trading Standards are also available to give advice around age verification schemes and preventing underage sales. See Appendix A for contact details.
166. This section of the strategy is intended to provide a guide to prospective licence Applicants as to the types of controls that may be appropriate for the promotion of the protection of children from harm licensing objective. It is neither intended to provide a definitive list of preventative measures nor will the controls listed be appropriate in every circumstance. They are provided to be considered and modified to fit the proposed business operation.169. Applicants should note that where its discretion is engaged following the consideration of relevant representations, the Licensing Authority will consider attaching appropriate conditions to protect children from harm.

Access to premises by children

167. The act makes it an offence to permit children under the age of 16, who are not accompanied by an adult to be present on premises being used exclusively or primarily for the supply of alcohol for consumption on those premises, under the authorisation of a premises licence, club premises certificate or where that activity is carried on under the authority of a temporary event notice. In addition, it is an offence to permit children under 16 who are not accompanied by an adult, between 00:00 (midnight) and 05:00 at other premises supplying alcohol for consumption on the premises, under any such authority.
168. The Council recognises, however, that licences may be sought for a great variety of premises, including theatres, cinemas, restaurants, concert halls, take-away and fast-food outlets as well as public houses and nightclubs. While the Council would encourage Applicants to make provision for the access of children where appropriate, conditions restricting the access of children will be strongly considered in circumstances where:
 - 1) Adult entertainment is provided;

- 2) A member or members of the current management have been convicted for serving alcohol to minors or with a reputation for allowing underage drinking;
 - 3) It is known that unaccompanied children have been allowed access;
 - 4) There is a known association with drug taking or drug dealing;
 - 5) The premises are used exclusively or primarily for the sale of alcohol for consumption upon the premises.
169. Applicants must be clear in their operating schedules about the activities intended to be provided and the times at which these shall take place, in order to help determine when it is not appropriate for children to enter the premises.
170. Conditions should reflect the licensable activities taking place on the premises. Consideration should be given to appropriate conditions.
- 1) Restricting the hours when children are present;
 - 2) Restricting or excluding children under a specified age when particular specified activities take place;
 - 3) Restricting the parts of the premises to which children may have access;
 - 4) Imposing age restrictions (below 18);
 - 5) Requirements for an accompanying adult;
 - 6) Full exclusion of people under the age of 18 years from the premises.

Age Verification Policies

171. It is a mandatory licence condition for premises that sell or supply alcohol to have an age verification policy in place. The Authority favours the Challenge 25/Check 25 type schemes. Such a scheme volunteered as part of an operating schedule.
172. A digital form of proof of age approved by the Proof of Age Standards Scheme (PASS) would be deemed satisfactory.
173. Southwark's Trading Standards service, as a Responsible Authority, considers every licence application made to the Licensing Authority and makes recommendations on an appropriate range of management controls, especially with regard to preventing underage sales of alcohol and the protection of children from harm.

Underage Sales/The Purchase and consumption of alcohol by children and young persons

174. Trading Standards also conducts underage sales test purchasing operations to monitor compliance. Where possible, such operations follow the Office of Product Safety and Standards (OPPS) published code of practice for regulatory delivery on age-restricted products and services.
175. Trading Standards' current guidance for preventing underage includes the elements set out below. The guidance takes into account the government's published Age-Related Products and Services Framework. It is recommended that all operators give careful consideration to introducing such controls into their management practices and operating schedules. The guidance may be revised in light of new developments. Such practices include:
- 1) Challenge 25 should form part of the mandatory age verification policy. The policy should require the production of evidence of age, comprising any Proof of Age Standards Scheme (PASS) approved proof of age, passport or driving licence, from any person who

- is attempting to buy alcohol and who appears to staff engaged in selling or supplying alcohol to be under 25 years old;
- 2) Challenge 25 notices and point of sale material should be displayed informing customers and staff that sales of alcohol will not be made to anyone appearing to be under 25 unless they can prove they are 18 or over;
 - 3) Evidence of the operation of Challenge 25 (in the form of documented procedures) should be maintained and made available for inspection by authorised council officers or the Police;
 - 4) All staff to be trained in the prevention of sales of alcohol to underage persons (including the prevention of 'proxy sales') and the age verification Challenge 25 policy.
 - 5) An incident log or refusals register shall be maintained to record details of all refused sales of alcohol in order to demonstrate effective operation of the Challenge 25 policy.
 - 6) CCTV recording systems shall be positioned to capture the sale of alcohol.
 - 7) A personal licence holder shall be on the premises at all times that alcohol is supplied;
 - 8) An EPOS (electronic point of sale) system is installed at the premises which is configured to prompt the operator to check proof of age when an alcoholic product is scanned.
 - 9) The DPS shall ensure that, as far as is reasonably practical, alcohol for exposed sale is displayed in an area which can be constantly monitored or supervised by staff, separate from goods likely to be purchased by persons under 18;
 - 10) If any advertising campaigns or promotions of alcohol are planned, the premises licence holder shall ensure they are carried out in a socially responsible manner and that they do not encourage irresponsible drinking and shall cease where an authorised council officer or the Police raises concerns about the campaign or promotion.
 - 11) Children and responsible drinks promotions
176. The Portman Group operates on behalf of the alcohol industry, the 'Code of Practice of the Naming, Packaging and Promotion of Alcoholic Drinks', to ensure that alcohol is marketed responsibly and only to adults.
177. The Code applies to all alcohol marketing (including naming, packaging, and promotion of products, event sponsorship and point of sale material) which is primarily UK-targeted and not already subject to regulation by the Advertising Standards Authority (ASA) or Ofcom. The Code can be viewed at <https://www.portmangroup.org.uk/codes-of-practice/>

Film Classification

178. Films intended only for local exhibition may be classified by the local Licensing Authority as an alternative to the BBFC. This Authority has a Film Viewing Board for that purpose.
179. For a local age classification to be considered, it is important that good notice (a minimum of 2 months) is given of the proposed exhibition. It is necessary for the Board to view the version of the film that is intended to be exhibited, and so a good quality copy on acceptable media is required in advance of the exhibition. The following information is to be provided by the proposed exhibitor:
- 1) a synopsis of the film program(s) must be sent to the Licensing Unit a minimum 2 months in advance of the proposed screening date, where possible, giving sufficiently detailed and accurate information on any potentially controversial issues such as: discrimination,

- drugs, horror, imitable behaviour, language, nudity, sex, theme, violence and in particular anything considered over 18 (e.g. R18);
- 2) information on active and thorough child protection policies, including any permission processes required to be obtained for children to appear in any film exhibition;
 - 3) information on how staff are informed on policies and matters that may be significant at the time of the exhibition;
 - 4) information on feedback and evaluation procedures;
 - 5) information as to the steps that will be taken to display notices inside and outside the premises so that persons entering can readily read them and be aware of the classification attached to the film;
 - 6) information on the use of sufficient ushers/stewards (minimum 18 years old) to be in attendance at the entrance to the viewing room at all times, to ensure that only children who may view the film or exhibition are permitted access.
180. A fee to offset the costs of classifying a film, based on the film's duration, will be charged.
 181. The Licensing Authority will not reclassify films already classified by the BBFC except where the parts of the film have been edited to remove content that may result in a lower classification.
 182. Please contact the Licensing Team to discuss your exhibitions (see Appendix A for contact details). For other safeguarding considerations, please see Appendix C.
 183. Where a premises licence with the authority to show films wishes to provide special screening, such as mother/parent and baby screening, a variation application or TEN can be submitted to the licensing authority. (Please refer to Chapter 3 for TENS).
 184. Applicants are expected to include within their operating schedule any arrangements for restricting children from viewing age-restricted films. For other safeguarding considerations, please see Appendix C.

Regulated entertainment provided for children

185. Where entertainments or facilities are generally provided specifically for children, Applicants are asked to demonstrate within their application:
 - 1) That the company/organisation has a policy or statement on keeping children safe from harm;
 - 2) How employees or contracted agencies will be made aware of the company's / organisation's policy/statement on keeping children safe from harm;
 - 3) That recruitment processes for staff who may have to deal directly with children under the age of 18 seek to ensure, as best the company/organisation can, that the appointed Applicant has not been known to have harmed children;
 - 4) That there will be clear expectations on staff with regard to their personal conduct in direct relations with children under 18 and guidance on what is appropriate in dealing with specific situations which may arise;
 - 5) There are systems in place and staff are aware of them for dealing with possible abuse or violence to children from other users of the licensed facility;

- 6) There are clear and accessible complaint systems for children to report if they have been harmed and there are clear whistle-blowing procedures for staff who may have concerns about the welfare of children on the premises;
 - 7) That all duty managers or staff in charge of the premises are aware of how to refer any concerns about the welfare of children to the local Police, Education Authority or Social Services as necessary.
186. Where a theatrical entertainment is specially presented for children, the Council advises the presence of sufficient adult staff to control access and egress of children and to protect them from harm as follows:
- 1) An adult member of staff to be stationed in the vicinity of each of the exits from any level, subject to there being a minimum of one member of staff per 50 children or part thereof;
 - 2) No child (unless accompanied by an adult) to be permitted in the front row of any balcony;
 - 3) No standing to be permitted in any part of the auditorium during the performance.

Child Sexual Exploitation (CSE)

187. Sexual exploitation is when a child under the age of 18 is manipulated into having sex or engaging in sexual activities, usually in return for something. It is a form of abuse and a crime.
188. This Authority and its partners are committed to tackling and preventing the sexual exploitation of children and young people.

London Safeguarding Children's Board

189. The London Safeguarding Children's Board provide advice and guidance for licensed premises operators and their staff in their policy 'Safeguarding Children Policy for Licensed Premises', which can be viewed using the link provided https://www.londoncp.co.uk/sg_licensed.html#. All operators are advised to display a copy of the procedure and accompanying poster available upon the premises.
190. The London Safeguarding Children's Board provide advice and guidance for licensed premises operators and their staff in their policy 'Safeguarding Children Policy for Licensed Premises', which can be viewed using the link provided [London Safeguarding Children Procedures](#). All operators are advised to display a copy of the procedure and accompanying poster available upon the premises.
191. Operators writing the policies and procedures for their premises staff may also include appropriate measures/training covering how staff would deal with unsupervised very young children being on the premises, or children causing perceived problems on/around the premises.

Child sexual exploitation and communities

192. It's better to prevent children from being harmed than to have to help children recover from the trauma of being sexually exploited. The Council and Southwark Police are carrying out widespread community education to ensure everyone knows what to do to prevent harm to children, and we're sure that you, too, have a big role to play. For more information, please visit our website at [Child sexual exploitation \(CSE\) | Southwark Council](#)

Southwark Safeguarding Children's Board

193. Southwark Council, local Police, health services, local schools, community and faith groups and the voluntary sector all come together to keep children safe at the Southwark Safeguarding Children's Board. [Southwark Safeguarding Partnership -](#)
194. The Safeguarding Board wants to reach parents, children and young people, and all local organisation's with information about stopping child sexual exploitation. There are 9 different "types" of child sexual exploitation. Sexual exploitation often happens alongside other forms of child exploitation, such as forcing children to break the law by carrying drugs or weapons and using that to blackmail a child. It's easy to understand the danger to children when their "best friend" is a criminal. There's a role for everyone to play to put a stop to this, and we'll support you in playing your role.

Entertainment involving striptease and nudity

195. Applicants proposing activity that includes adult entertainment are also referred to Southwark's policy in relation to the Local Government (Miscellaneous Provisions) Act 1982 (the 1982 Act) and as amended, and Appendix C of this policy.

Chapter 9 – ENFORCEMENT

Enforcement

196. It is essential that licensed premises operate in accordance with the Act and comply in full with the licence terms, conditions and restrictions at all times.
197. Part of the Licensing Authority's role is to monitor premises operations and take appropriate enforcement action to promote the licensing objectives, support good management practice, and protect the local community. This Authority recognises the importance of the enforcement role and will work in partnership with all relevant agencies to promote the licensing objectives, taking effective enforcement actions where appropriate. The Licensing Act 2003 outlines a number of offences related to the sale and consumption of alcohol, as well as the operation of licensed premises. Please refer to <https://www.legislation.gov.uk/ukpga/2003/17/part/7>
198. Southwark Council's Regulatory Enforcement policy sets out the approach to enforcement across the service. This can be found at: https://www.google.com/search?q=southwark+Regulatory+Services+Enforcement+Policy+2021&rlz=1C1GCEB_enGB1159GB1160&oq=southwark+Regulatory+Services+Enforcement+Policy+2021+&gs_lcrp=EgZjaHJvbWUyBggAEEUYOTIGCAEQRRg80gEJOTM1NWowajE1qAllsAIB8QU_N5hTSGUZEa&sourceid=chrome&ie=UTF-8
199. All proactive premises inspections will be undertaken on a thorough risk-based assessment, with resources targeted toward a problem or high-risk premises which require greater attention. A lighter touch will be applied in respect of premises, which can show they are well run and present a low risk. Details of the basis for our risk-assessment approach can be obtained from the licensing service.
200. Intelligence-led enforcement activities will be carried out when. Public complaints, referrals from the local community teams, reports from Officers and other partner agencies.
201. To promote effective use of enforcement resources and reduce the burden on business, those enforcement agencies inspecting and investigating particular matters may note other matters normally dealt with by another relevant agencies during the course of premises visits.
202. To ensure public safety, these matters identified will be brought to the attention of the licence holder and then reported to the issue to appropriate agency. (When a Licensing Officer notes a fire safety matter, it will be referred to the fire service.)

Partnership Working

203. This partnership approach is supported and facilitated by:
 - 1) Partnership Night Time Economy Team (NTE);
 - 2) Regular liaison meetings between the licensing service and the Police Licensing Teams;
 - 3) Regular meetings of the primary Responsible Authorities;
 - 4) The partnership tasking group; and
 - 5) A commitment to multi-agency working.
204. The partnership NTE (council and/or relevant agencies) intends to provide a high-visibility, reassuring presence in the night-time economy and to establish good working relationships

with venue front-of-house and management staff. Random visits will be made to premises in furtherance of these aims.

205. Covert test purchases of all age-restricted products, including alcohol. Challenge 25 compliance. Sale of contraband / smuggled goods products including alcohol. Challenge 25 compliance. Sale of contraband / smuggled goods.
206. The results of investigations and test purchasing will be communicated to the business operator, either at the time or in writing, after the event.
207. This Authority recognises the important role played in preventing crime and disorder by the personnel the Security Industry Authority regulates. In partnership with the SIA Border Force Policy, we will ensure door supervisors are properly licensed. As part of this co-operation, it has authorised Officers to act under the powers of the Private Security Industry Act 2001.
208. This Authority recognises pub and club watch schemes and is willing to support business-led initiatives intended to help promote the licensing objectives.

APPENDIX A – CONTACT DETAILS

Southwark Licensing Team

Regulatory Services

3rd Floor Hub 1

PO Box 64529

London SE1P 5LX

E-mail: licensing@southwark.gov.uk

By phone: Customer Service centre on 020 7525 2000

By e-mail: licensing@southwark.gov.uk

By visiting the website: <https://www.southwark.gov.uk/business/licences>

Responsible Authorities

Licensing Authority

Southwark Council

3rd Floor Hub 1

PO Box 64529

London SE1P 5LX

E-mail: licensing@southwark.gov.uk

Health and Safety

Southwark Council, Floor 3, Hub 1,

PO Box 64529

London SE1P 5LX

E-mail: ohs.regen@southwark.gov.uk

***Please note** – this address is for premises that come under the Council for health and safety enforcement. Other premises, such as Council-owned premises, will come under the HSE and boats under the Maritime and Coastguard Agency.*

Planning Authority

The Council's Building and Development Control

Services Council Offices

5th Floor Hub 2

PO Box 64529

London SE1P 5LX

E-mail: planning.enquiries@southwark.gov.uk

Trading Standards

Southwark Council

Floor 3, Hub 1

PO Box 64529

London SE1P 5LX

E-mail:

TradingStandards.Regen@southwark.gov.uk

Environmental Protection Team (EHS)

Southwark Council

Floor 3, Hub 1

PO Box 64529

London SE1P 5LX

E-mail:

Environmental.Protection@southwark.gov.uk

The Chief Officer of Police

Southwark Police Licensing Unit

323 Borough High Street

London, SE1 2ER

E-mail: SouthwarkLicensing@met.police.uk

Tel: 0207 232 6756

Home Office Alcohol Licensing Team

Lunar House
40 Wellesley Road
Croydon
CR9 2BY
E-mail: Alcohol@homeoffice.gsi.gov.uk

The London Fire and Emergency Planning Authority

South East Area 3
London Fire Brigade
169 Union Street
London, SE1 0LL
E-mail: FireSafetyRegulationSE@london-fire.gov.uk
Telephone number: 020 8555 1200 Ext: 36500

The Local Safeguarding Children Board

Southwark Social Services
PO Box 64529
London SE1P 5LX
E-mail: qau.safeguarding@southwark.gov.uk
Tel: 020 7525 4646

Port of London Authority

(for vessels only)
London River House
Royal Pier Road
Gravesend,
Kent
DA12 2BG

***Note:** If you are applying for a premises or a club premises certificate and part of the premises concerned falls within another Licensing Authority's area, then that Authority should be copied in on the application also.*

Public Health

Southwark Council
1st Floor Hub 2
PO. Box 64529,
London SE1P 5LX
Email: publichealth.licensing@southwark.gov.uk
Tel. 020 7529 0026

Others

Southwark Disablement Association

Cambridge House
1 Addington Square
Camberwell
London, SE5 7JZ
Email: sda@sdaill.org
Tel: 020 7358 7740

Markets and Street Trading

SAST House
47-53 Dawes Street London
SE17 1EL
Email: streettrading@southwark.gov.uk
Tel: 020 7525 6000

Tables & Chairs/Street Furniture/Pavement Licensing

(or other temporary articles on the highway)
Highways Licensing Team
Southwark Council, Floor 3 Hub 1
PO BOX 64529,
London, SE1 5LX
Email Highwayslicensing@southwark.gov.uk

Culture and Events Team (for Safety Advisory Board)

Southwark Council, 3rd Floor - Hub C
PO Box 64529
London SE1P 5LX
Email: events@southwark.gov.uk
Tel: 020 75253422



Cumulative Impact

1. Chapter 14 of the Home Office Revised Guidance issued under s.182 of the Licensing Act 2003 (November 2025) sets out that relevant information which Licensing Authorities may be able to draw upon to evidence the cumulative impact of licensed premises on the promotion of the licensing objectives will include:
 - Local crime and disorder statistics, including statistics on specific types of crime and crime hotspots;
 - Statistics on local anti-social behaviour offences;
 - Health-related statistics such as alcohol related emergency attendances and hospital admissions;
 - Environmental Health complaints, particularly in relation to noise and litter;
 - Complaints recorded by the Local Authority, which may include complaints raised by local residents or residents' associations;
 - Evidence from local and parish Councillors; and
 - Evidence obtained through local consultation.
2. The Licensing Authority may consider this evidence, alongside its own evidence as to the impact of licensable activities within its area and consider, in particular, the times at which licensable activities are carried on. Information which may inform consideration of these issues includes:
 - Trends in licence applications, particularly trends in applications by types of premises and terminal hours;
 - Changes in terminal hours of premises;
 - Premises capacities at different times of night and the expected concentrations of drinkers who will be expected to be leaving at different times.
3. In summary, the steps to be followed in considering whether to adopt a special policy within the policy are:
 - a) Identify concern about crime and disorder; public safety; public nuisance; or protection of children from harm;
 - b) Consider whether there is good evidence that crime and disorder or nuisance are occurring, or whether there are activities which pose a threat to public safety or the protection of children from harm;
 - c) If such problems are occurring, identify whether these problems are being caused by customers of licensed premises, or that the risk of cumulative impact is imminent.
 - d) Identify the boundaries of the area where problems are occurring (this can involve mapping where the problems occur and identifying specific streets or localities where such problems arise);
 - e) Consult those specified in section 5(3) of the 2003 Act and, subject to the outcome of the consultation, include and publish details of the special policy in the licensing policy statement.
4. The effect of publishing a cumulative impact assessment is to create a rebuttable presumption that applications for new premises licences or club premises certificates or variations that are likely to add to the existing cumulative impact will normally be refused or subject to certain

limitations, following relevant representations. In such circumstances, it is for the Applicant to demonstrate that the application will not, if granted, further contribute to the negative local cumulative impact on any one or more of the licensing objectives.

5. This presumption does not relieve the Responsible Authorities or interested parties of the need to make a relevant representation. Such representation, which should reference the information which had been before the Licensing Authority when it developed its statement of policy, must be received before a Licensing Authority may lawfully consider giving effect to its special policy. If there are no representations, the Licensing Authority must grant the application in terms that are consistent with the operating schedule submitted. Once adopted, any policy will be reviewed within a three year period.
6. The Council will not use such policies solely:
 - As the grounds for removing a licence when representations are received about problems with existing licensed premises;
 - To refuse modifications to a licence, except when the modifications are directly relevant to the policy, for example where the application is for a significant increase in the capacity limits.

Southwark regeneration and planning policies

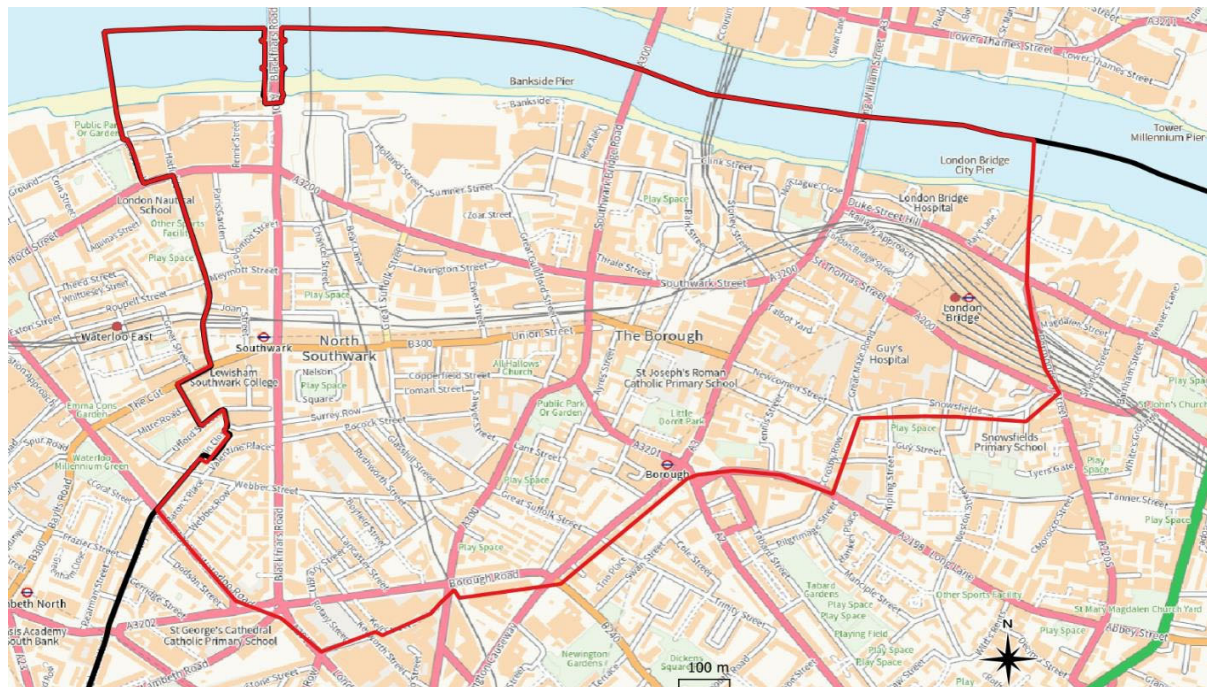
7. Local cumulative impact policies are not intended as a barrier to local regeneration; however regeneration and planning policies and schemes are separate regimes from licensing and each deals with different and separate local issues.
8. Applicants for premises licence and variations in regeneration areas and who have received assistance from the regeneration section of the Council with their planning consents, that receive relevant representations with regards to cumulative impact policies will still be required to adequately address the cumulative crime and disorder and public nuisance issues raised in this policy in order to successfully rebut the presumption against grant. This rebuttal can include evidence that the nature of the area has changed as a result of ongoing regeneration in the area. Applicants will still be expected to address the four licensing objectives within their operating schedule.

Southwark Cumulative Impact Areas (CIAs)

9. Since the introduction of the Licensing Act 2003, the Council's Licensing Committee has monitored the impact of licensed premises operation across the local Southwark area. Central to this monitoring lies the annual (Local Authority / Police) Partnership Analysis of Alcohol Related Harm.
10. The Southwark analysis has developed and improved over the years as information sources have been identified and developed. The analysis now incorporates a statistical analysis of:
 - Alcohol related violence;
 - Alcohol related disorder and rowdiness;
 - Alcohol related health harm;
 - The costs of alcohol related harm.
11. This information is supplemented by periodic reports provided the Council's Environmental Protection Team on noise nuisance complaints and other service and received information.

12. With around 1600 licensed premises operating within the Borough, parts of Southwark have now reached saturation point. Where this occurs, the economic benefits of providing alcohol outlets during the day and/or the night time economy begin to be outweighed by increased public nuisance and crime and disorder, loss of amenity and the costs of excessive alcohol consumption.
13. This Authority currently has three cumulative impact policies in place. In each case, the decision to introduce a local policy has been taken, having had regard to the latest analysis and following the process set out in Chapter 6 of this policy. The current CIAs are in:
 - Borough and Bankside;
 - Camberwell;
 - Peckham.
14. The boundaries of each local CIA are detailed below. A copy of the latest partnership analysis of alcohol-related harm and noise nuisance complaints is also available upon written request from the Licensing Service (see Appendix A for contact details). The effects of each policy will continue to be monitored and reported to the Licensing Committee periodically. A policy will be removed when no longer needed.
15. The Authority also has three monitoring areas, where consideration may be given to introducing additional CIAs if the crime data analysis supports their implementation in the future. These monitoring areas are:
 - Elephant and Castle;
 - Old Kent Road;
 - Walworth and East Street.

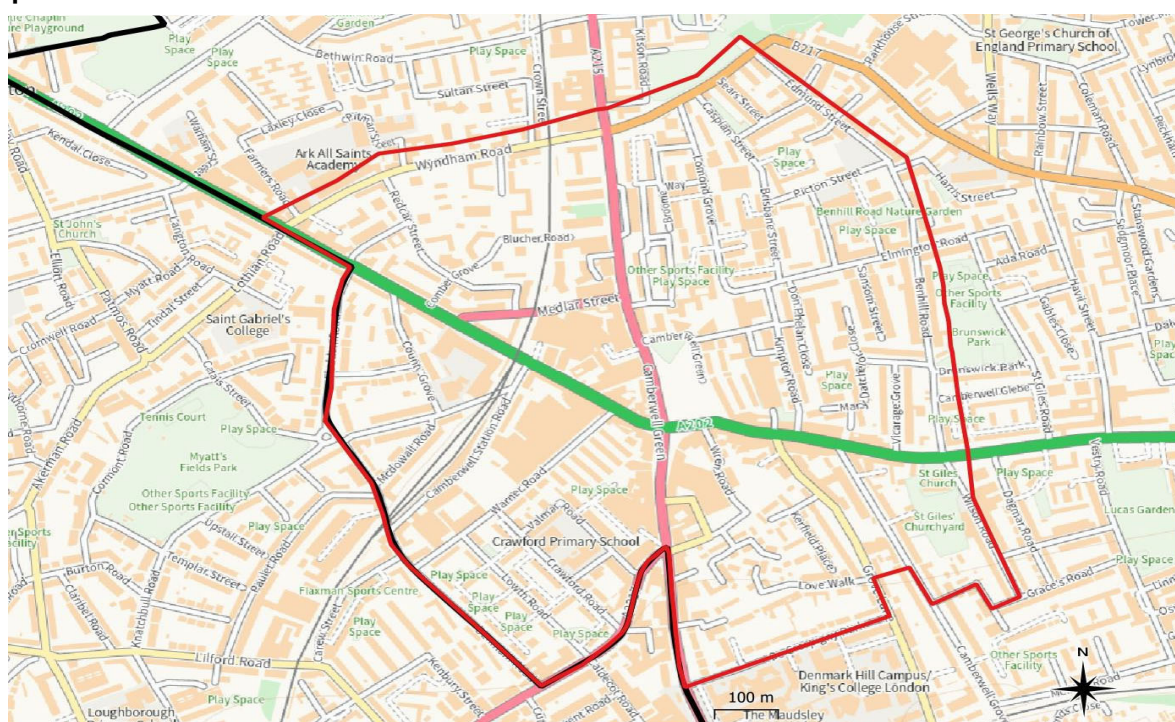
Map of Borough and Bankside CIA



Borough and Bankside CIA

16. On 4 November 2009, the Council Assembly agreed that it was appropriate and necessary to introduce a local policy dealing with the cumulative impact of licensed premises in the Borough and Bankside area. The boundary of the area was extended on 6 April 2011.
17. The boundary of the area to which the policy applies is defined as follows – Commencing at the Lambeth border on the Thames and moving southward to Waterloo Road then St George's Circus / Borough Road / Borough High Street / Long Lane / Crosby Row / Snowsfields / Bermondsey Street directly north to the river frontage and then westward back to the Lambeth border.
18. The classes of premises within the area to which the policy shall apply will be nightclubs / public houses and bars/restaurants and cafes / off-licences, supermarkets and grocers.

Map of Camberwell CIA

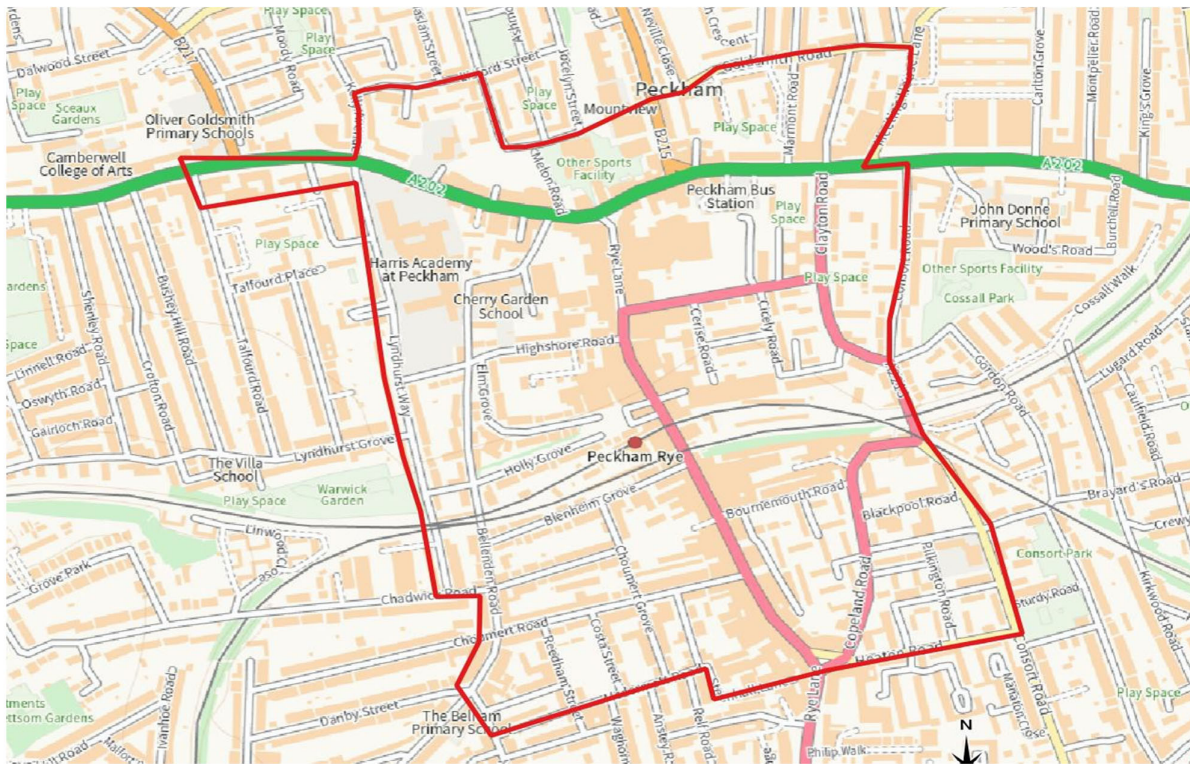


Camberwell CIA

19. On 5 November 2008, Council Assembly agreed that it was appropriate and necessary to introduce a local policy dealing with the cumulative impact of licensed premises in the Camberwell area.
20. The boundary of the area is defined as follows – From Camberwell New Road at the junction with Wyndham Road progressing via Camberwell Road / Bowyer Place / Edmund Street / Benhill Road / Wilson Road / Graces Road / Graces Mews/ Camberwell Grove (via alley) / Grove Lane / De Crespigny Park / Denmark Hill following the Lambeth boundary to Coldharbour Lane / Denmark Road / Flodden Road and Camberwell New Road returning to the start.

21. The classes of premises to which the policy applies are defined as follows: night clubs; pubs and bars; off-licences, grocers, supermarkets, convenience stores and similar premises.

Map of Peckham CIA



Peckham CIA

22. On 5 November 2008, Council Assembly agreed that it was appropriate and necessary to introduce a local policy dealing with the cumulative impact of licensed premises in the Peckham area. On 4 November 2009 the boundary of the policy area was extended.
23. The boundary of the area is defined as follows: Commencing on Peckham High Street at the junction with Kelly Avenue progressing to Gattonby Street / Sumner Road / Jocelyn Street / cross Peckham Hill Street / Goldsmith Road / Meeting House Lane / Consort Road / Heaton Road / Sternhall Lane / McDermott Road / Maxted Road / Bellenden Road / Chadwick Road / Lyndhurst Way / Peckham Road to junction with Talfourd Road and back to start.
24. The classes of premises to which the policy applies is defined as follows: nightclubs; pubs and bars; off-licences, grocers, supermarkets, convenience stores; and similar premises.

Review of CIAs

25. CIAs must be reviewed every three years to see if supporting crime statistics justify their relevance, or if those monitoring areas now justify a CIA introduction. Analysis is done, comparing any changes over long and short-term periods, looking at crime data from the Metropolitan Police

and the London Ambulance Service over the last seven years. Anti-social behaviour calls to the Police, categorised as rowdy behaviour or street drinking, have also been included. This data analysis is available by contacting the Licensing Service. Reviewing these figures for the CIAs and the monitoring areas, the proportions do not change significantly.

26. At this time, all three CIAs are to remain in place and unchanged. The monitoring areas are to remain in place and unchanged. There is a notable level of crime in the Elephant and Castle area, but it is considered at this time, to be as a result of the location being a major transport exchange hub, with those responsible for alcohol- related crime passing through the area, rather than as a result of local alcohol-led premises. As this area is undergoing significant regeneration, with many additional future alcohol-licensed venues planned, this will be reassessed in the future.
27. All Applicants for new premises licences or for variation of existing premises licences, made in respect of classes of premises affected by the policy, located within a special policy area, must address the local concerns raised within their application and operating schedule.
28. The licensing service, acting in its role as Responsible Authority, will review each application in the light of the special policies and will make representations where the application is likely to add to the existing impact
29. Where a presumption against the grant of a licence exists and a relevant representation has been received, this Authority must consider whether it would be justified in departing from its special policy in the individual circumstances of the case. This Authority will need to be satisfied that the grant of the application under consideration will not further impact on the relevant licensing objectives, before any grant or part grant of the application can be approved.

APPENDIX C - OTHER RELATED LEGISLATION AND STRATEGIES

Vulnerability and Vulnerable Persons

1. We expect all licensed premises to have appropriately trained staff who are proactive and vigilant around the safety of vulnerable people in the night time economy. This includes a duty to capture information and report to the police where appropriate.

Women's Safety Charter

2. This Authority is deeply concerned by the ongoing issue of female sexual harassment in bars, nightclubs, and other licensed venues, particularly the normalisation of such behaviour, which often goes unchallenged or unreported.
3. In line with the Women's Night Safety Charter, which aims to address these concerns, this Authority encourages any organisation's that operate at night to take proactive steps in creating a safer environment for women. The Charter, which is part of the Mayor's Tackling Violence Against Women and Girls Strategy, sets out clear actions for venue management to ensure women's safety. The key pledges include:
 - Appoint a champion within your organisation who actively advocates for women's night safety.
 - Showcase your commitment to women's safety at night to staff and customers, such as through a communications campaign.
 - Reassure customers and staff that London is safe, while providing guidance on what to do if they experience harassment while working, socialising, or travelling.
 - Promote reporting by both victims and bystanders as part of your communications campaign.
 - Train staff to ensure that all women who report incidents are taken seriously.
 - Ensure staff are trained to properly record and respond to all reports.
 - Design public spaces and workplaces with the aim of enhancing safety for women at night.
4. Many responsible and forward-thinking venues have already committed to these principles. The Authority strongly encourages all licensed premises to sign up to the Women's Night Safety Charter as a step toward ensuring that their venues remain safe spaces for everyone, free from harassment.
5. This Authority strongly recommends that every licensed operator demonstrates their commitment to ensuring that their premises also provide a safe environment for women by doing the same. We also recommend licence holders put in place measures to reduce gender-based violence, intimidation and harassment for all staff and customers. This may include 'Ask for Angela', WAVE and specific training for staff. Further details are available at the following links:
 - Ask for Angela: <https://askforangela.co.uk/>
 - Ask for Clive: <https://askforclive.com/>
 - VAGW: <https://www.met.police.uk/police-forces/metropolitan-police/areas/about-us/about-the-met/vawg-action-plan-summary/overview-action-plan/>
 - WAVE: <https://www.saferbusiness-training.org.uk/wave>

- Victim Support: <https://www.victimsupport.org.uk/>
 - TFL Safer Travel in London: <https://tfl.gov.uk/campaign/safer-travel>
6. Further information can be accessed through the Council's website, [Sign up to the Women's Night Safety Charter | Southwark Council](#) or by contacting the Licensing Team.

Safe Havens

7. Safe Havens are a way for you to get support from local businesses or places if you need help.
8. People can go to them if they feel scared or threatened. They are mainly aimed at women and girls to access support if they feel harassed, vulnerable or in need of help, but anyone can use a Safe Haven. It could be a café, library, shop or other local, welcoming place. These spaces offer people a free, confidential, safe place when they need it.
9. They can offer water, electricity, wi-fi or a phone. It can also be a way for people to contact family/friends or be signposted to transport or support services. Safe Havens can also make phone calls to emergency services on people's behalf. More information can be found at <https://www.saferbusiness.org.uk/safe-havens>
10. Look out for locations with a Safe Haven sticker in their window.



Other relevant legislative requirements

11. The Council has other general statutory requirements relating to crime and disorder, anti-social behaviour, health, nuisance, human rights, disability discrimination and race relations. These are briefly outlined below.

Modern Day Slavery

The Modern Slavery Act 2015 is a UK law focused on combating modern slavery and human trafficking. It consolidates existing offences and introduces new measures to protect victims, punish offenders, and increase transparency in supply chains.

<https://www.legislation.gov.uk/ukpga/2015/30/contents>

Terrorism (Protection of Premises) Act 2025 (Martyn's Law)

The Terrorism (Protection of Premises) Act 2025 (the Act) seeks to create a safer environment by ensuring that those responsible for public spaces and events.

'The Act' mandates that those responsible for certain premises and events must be identified before an event, and they must consider and implement measures to mitigate the risk of terrorist attacks and improve their ability to respond to such events.

Whilst 'The Act' received Royal Assent on 3 April 2025 and it is expected that the implementation period will be at least 24 months.

You must bear in mind the background to the legislation. Circumstances may influence an earlier commencement date, and operators must consider that the lead-in time and resource booking for large events (events over 800 persons) is normally around 15 months.

The Anti-Social Behaviour Crime and Policing Act 2014

The Anti-Social Behaviour, Crime and Policing Act 2014 defines 'anti-social behaviour' as "conduct that has caused, or is likely to cause, harassment, alarm or distress to any person"; "conduct capable of causing nuisance or annoyance to a person in relation to that person's occupation of

residential premises”; or “conduct capable of causing housing-related nuisance or annoyance to a person”.

The Act contains a range of powers intended to support Local Authorities and partner bodies in dealing with anti-social behaviour. These include powers of premises closure in cases of nuisance or disorder, which may support primary legislation.

Clean Neighbourhoods and Environment Act 2005

This provides Local Authorities with additional powers to tackle poor environmental quality and anti-social behaviour. In particular, the Act includes sections on nuisance and abandoned vehicles, litter, graffiti, waste, noise and dogs. The Act gives Local Authorities powers to issue fixed penalty notices to any licensed premises emitting noise that exceeds the permitted level between the hours of 23:00 and 07:00.

Crime and Disorder Act 1998

Section 17 of the Crime and Disorder Act 1998 is aimed at giving the vital work of crime and disorder reduction a focus across the wide range of local services and putting it at the heart of local decision-making. It places a duty on key Authorities, including Local Authorities and the Police and Fire and Rescue Authorities, to do all they reasonably can to prevent crime and disorder in their area.

All Local Authorities must fulfil their obligation under section 17 of the Act when carrying out their functions as Licensing Authorities under the 2003 Act. The Council as Licensing Authority must consider how the exercise of its functions impacts upon and contributes toward the prevention of crime and disorder within its area.

This statement of licensing principles is intended to support the work of the local Crime and Disorder Reduction Partnership, the Safer Southwark Partnership through measures under both the Crime and Disorder Reduction Strategy, the Violent Crime Reduction Strategy and the Alcohol Strategy.

The Environmental Protection Act 1990

The Act provides the fundamental structure and authority for waste management and control of emissions into the environment. The management of statutory nuisance is set out in Part III of the Act. The Act places a duty on a Local Authority to investigate complaints of statutory nuisance from people living within its area

Equality Act 2010

The Equality Act 2010 legally protects people from discrimination in the workplace and in wider society. It replaced previous anti-discrimination laws with a single Act, making the law easier to understand and strengthening protection in some situations.

The Act also imposes a public sector equality duty. This means that public bodies, including this Licensing Authority, must consider all individuals when carrying out their day-to-day work, in shaping policy, in delivering services, and in relation to their own employees.

It also requires that public bodies

- Have due regard to the need to eliminate discrimination
- Advance equality of opportunity
- Foster good relations between different people when carrying out their activities

This Authority recognises Southwark’s diversity as one of its strengths and is committed to creating a more inclusive community. Our aim is to ensure that nothing within this Statement of Licensing Policy discriminates against any group within the community and will pursue any opportunity to

promote equality of opportunity and good community relations. To this end, the Authority will undertake equalities impact assessments of the policy at regular intervals to identify the effects the policy may have had for different groups and take appropriate action to prevent direct and indirect discrimination which may have been the result of the policy statement.

We also recognise that other service providers providing licensable activities including shops, hotels, pubs, theatres and more hold similar responsibilities. Service providers have an obligation to make reasonable adjustments to premises or to the way they provide a service.

While access for people with disabilities is not one of the four licensing objectives, this Council expects that responsible licensees will comply with the requirements of the Equality Act 2010. The Southwark Disablement Association can provide advice to any Licensee on reasonable adjustments – contact details are provided in Appendix A.

Alternatively, see the government's planning and access for disabled people good practice guide <https://assets.publishing.service.gov.uk/media/5a78adbce5274a2acd188f2b/156681.pdf>

Public Sector Equality Duty

- (1) A Public Authority must, in the exercise of its functions, have due regard to the need to—
 - (a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;
 - (b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
 - (c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.
- (2) A person who is not a Public Authority but who exercises public functions must, in the exercise of those functions, have due regard to the matters mentioned in subsection (1).
- (3) Having due regard to the need to advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it involves having due regard, in particular, to the need to—
 - (a) remove or minimise disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic;
 - (b) take steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it;
 - (c) encourage persons who share a relevant protected characteristic to participate in public life or in any other activity in which participation by such persons is disproportionately low.
- (4) The steps involved in meeting the needs of disabled persons that are different from the needs of persons who are not disabled include, in particular, steps to take account of disabled persons' disabilities.
- (5) Having due regard to the need to foster good relations between persons who share a relevant protected characteristic and persons who do not share it involves having due regard, in particular, to the need to—
 - (a) tackle prejudice, and
 - (b) promote understanding.
- (6) Compliance with the duties in this section may involve treating some persons more favourably than others, but that is not to be taken as permitting conduct that would otherwise be prohibited by or under this Act.
- (7) The relevant protected characteristics are—
 - age;
 - disability;
 - gender reassignment;

- pregnancy and maternity;
- race;
- religion or belief;
- sex;
- sexual orientation.
- sex;
- sexual orientation.

The Gambling Act 2005

An Act designed to control all forms of gaming and betting. Under this legislation, local Licensing Authorities are made responsible for licensing gambling venues and are provided with a range of enforcement powers.

Local Government (Miscellaneous Provisions) Act 1982 (the 1982 Act) and as amended ☐

Schedule 3 of the Act sets the standards that must be met to ensure the health and safety of all employees and others who may be affected by any work activity.

The legislation was amended to provide legislative control on a sexual entertainment venue. A premises where movement and dance are provided by performers, some of whom are nude. This must be before a live audience for the financial gain of the organiser or entertainer, unless an exemption applies. A Premises Licence under the 2003 Act will still be required.

The Health Act 2006

The Health Act 2006 introduced the ban on smoking in all enclosed workplaces and public spaces, including smoking in pubs, restaurants and members' clubs where bar or other staff are employed. The law is enforced by Local Authorities.

The Health and Safety at Work Act 1974 and the Management of Health and Safety at Work Regulations 1999

The Health and Safety at Work Regulations 1999 states that:

“(1) The Health and Safety at Work Regulations 1999 state that:

“(1) every employer shall make a suitable and sufficient assessment of

- (a) The risks to the health and safety of his employees to which they are exposed whilst they are at work; and
- (b) The risks to the health and safety of persons not in his employment arising out of or in connection with the conduct by him of his undertaking, for the purpose of identifying the measures he needs to take to comply with the requirements and prohibitions imposed upon him by or under the relevant statutory provisions.

(2) Every self-employed person shall make a suitable and sufficient assessment of -

- (a) The risks to his own health and safety to which he is exposed whilst he is at work; and
- (b) The risks to the health and safety of persons not in his employment arising out of or in connection with the conduct by him of his undertaking,”

The Health and Safety Executive helpfully provides a range of example risk assessments which may be viewed at [HSE: Information about health and safety at work](#). The examples provided include for nightclubs, pubs, village halls, Off-licences and convenience stores.

The Human Rights Act 1998

The Human Rights Act 1998 incorporates the European Convention on Human Rights, making it unlawful for a Local Authority to act in any way that is incompatible with a convention right. The Council will have particular regard to the relevant provisions of the European Convention of Human

Rights –

- Article 1 of the first protocol that every person is entitled to the peaceful enjoyment of his possessions, including for example the possession of a licence;
- Article 6 that in determination of civil rights and obligations everyone is entitled to a fair and public hearing within a reasonable time by an independent and impartial tribunal established by law;
- Article 8 that everyone has the right to respect for his home and private life.

Regulatory Reform (Fire Safety) Order 2005

The Regulatory Fire Safety (Reform) Order 2005 covers general fire safety in England and Wales. In the majority of premises, local Fire and Rescue Authorities enforce this fire safety legislation. Under the Regulatory Reform (Fire Safety) Order 2005 the “responsible person” as defined by the order, must:

- Take such general fire precautions as will ensure, so far as is reasonably practicable, the safety of his or her employees;
- Take such general fire precautions as may be reasonably required in the circumstances of the case to ensure that the premises are safe for the use by other persons;
- Make a suitable and sufficient assessment of fire risks to which relevant persons may be exposed for the purposes of identifying the general fire precautions he or she needs to take;
- The responsible person **MUST** record the information gathered by the risk assessment for all premises covered by the Licensing Act 2003, in particular, the significant findings; the measures taken, or to be taken, to ensure general fire safety; and any person identified as being especially at risk.

This Authority recognises that it may not impose any condition relating to any requirement or prohibition that is or could be imposed under the “Fire Safety Order” and thereby that conditions relating purely to fire safety matters may not be placed on premises licences. Further information and guidance about the Order and fire safety legislation is available from the Communities and Local Government website at www.communities.gov.uk/fire.

Children Act 2004

Section 11 of the Children Act places a duty on a range of organisation’s, agencies and individuals to ensure their functions, and any services that they contract out to others, are discharged having regard to the need to safeguard and promote the welfare of children. This specifically includes local Licensing Authorities. [Children Act 2004](#)

Other strategies and policies

This Authority will look to secure the proper integration of this policy with other Council and government policies, strategies, responsibilities, and guidance documents issued. In this context this policy is informed by the following strategies and policies.

Southwark Enforcement Policy

All enforcement actions taken by the licensing service are governed by the Council’s enforcement policy, which has been drafted with reference to the Principles of Good Regulation as stated in the Legislative and Regulatory Reform Act 2006 and the Regulators Code, as published by the Better Regulation Delivery Office.

Southwark Violence Duty Strategy

This strategy is a legal requirement for local authorities, police, and other public agencies to work together to prevent and reduce serious violence in the borough, which sets out the underlying causes and impacts of violent behaviour and makes recommendations as to how the Council and its partner Authorities can make the best use of our resources at a time when those resources will

significantly reduce.

Guidance Documents

This policy is also mindful of the direction provided under the following guidance documents:

- The Home Office Safer Clubbing Guide was issued to ensure the health and safety of anyone who attends dance events, with a particular emphasis on those who also take controlled drugs.
- The Better Regulation Delivery Office's Code of Practice on Age Restricted Products, which deals with the involvement of children in the enforcement of legislation concerning the sale of age-restricted goods.
- The objectives of the Private Security Industry Authority (SIA) will be taken into account in all issues relating to the provision of door supervision at licensed operations.
- The Office for Health Improvement and Disparities (OHID), which is responsible for guidance on alcohol commissioning.
- Section 182 Guidance issued by the Secretary of State.
- National Licensing Policy Framework (NLPF) - The Licensing Authority has had regard to the NLPF when preparing this Statement of Licensing Policy. While the NLPF is non-statutory, its objectives and guidance inform the Authority's approach to licensing decisions and policy development. The Authority is committed to:
 - Implement a consistent and transparent approach to licensing decisions, tailoring conditions to each establishment based on factual evidence rather than assumptions.
 - Foster economic development, revitalisation, and community engagement while adhering to the four key licensing objectives: preventing crime and disorder, ensuring public safety, minimising public nuisance, and protecting children from harm.
 - Promote innovation and adaptability, including the effective use of Temporary Event Notices (TENs) to support temporary events as suggested by the framework.
 - Base decisions on risk assessment and evidence, steering clear of unnecessary restrictions that may impede investment or cultural growth.
 - Align licensing with local planning and regeneration initiatives to enhance a dynamic and secure hospitality and leisure sector.

Where any inconsistency arises between this framework and the 2003 Act or section 182 Guidance, the latter prevails. Decisions must be necessary and proportionate, non-discriminatory and consistent with the Regulators' Code.

This policy will also be checked for consistency with all current legislation, strategy, policy and guidance on a regular basis.



Licensing Policy Consultation Results

Regulatory Services

DECEMBER 2025

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Executive Summary

- 1.1 As required under the Licensing Act 2003, a comprehensive review of the Licensing Policy was undertaken. This report provides an overview of the statutory requirements for the Licensing Policy 2026–2031 consultation, how these requirements were met, participation metrics, key results, and conclusions on compliance and impact.

Legal requirement

- 1.2 The Licensing Act 2003 came into effect on 25 November 2005. The Act introduced a legal framework for local authorities to administer and regulate licensable activities, namely, alcohol, regulated entertainment, and late-night refreshment.
- 1.3 The Act ¹requires each licensing authority to prepare and publish a statement of the licensing policy every five years. The policy statement is expected to set out for the benefit of applicants, responsible authorities and members of the local community, how the authority intends to approach its licensing responsibilities under the Act. In determining its policy, the council is exercising a licensing function and, as such, must have regard to the guidance issued by the Secretary of State under section 182 of the Act².
- 1.3 Each authority is also required to keep the statement of policy under review throughout its term and make appropriate revisions as necessary. Every revision of the policy is required by law to be subject of full public consultation.
- 1.4 Southwark's current Statement of Licensing Policy is set to expire in 2026, necessitating a comprehensive public consultation to ensure the revised policy meets legal obligations and reflects community needs.

Balancing Interests

- 1.5 Southwark Council faces the challenge of balancing multiple priorities while meeting its legal duties under the Act. The policy must encompass alcohol, entertainment, and late-night refreshment, each with its own set of implications for public safety and community harmony. The four licensing objectives—prevention of crime and disorder, public safety, prevention of public nuisance, and protection of children from harm—serve as the guiding principles for policy development.
- 1.6 Achieving these objectives required a refined approach that considers the needs of businesses, residents, and enforcement agencies. The council must ensure that the policy is clear, enforceable, and adaptable to changing circumstances. This involves addressing issues such as anti-social behaviour, noise complaints, and underage drinking, which are

¹ Section 5 of the Licensing Act 2003

² Revised guidance was issued in November 2025

often linked to licensed premises. The challenge lies in creating a policy that is both robust and flexible, capable of promoting a safe and vibrant environment.

- 1.7 The revised policy addresses the licensing requirements of alcohol, regulated entertainment, and late-night refreshment and the licensing objectives, all of which have significant impacts on residents and businesses.

Communication and Consultation Process

- 1.8 The consultation process was designed to be inclusive and participatory, ensuring that all voices were heard and considered. By engaging a diverse range of stakeholders, the council ensured the policy reflected community priorities while meeting statutory obligations. This approach demonstrated a commitment to transparency and fairness, making the consultation a genuine opportunity for engagement rather than a formality.
- 1.8 The engagement was structured into two phases. Phase One involved preliminary stakeholder engagement to inform the draft policy, while Phase Two was the formal public consultation, open to all members of the public and stakeholder organisations. This phased approach allowed for early input from key stakeholders and broad community engagement during the main consultation period.
- 1.9 Stakeholder engagement included both internal and external participants. Internally, the Licensing Committee, Licensing Team, Responsible Authorities, Public Health, Equalities Team, Legal Services, Community Safety.
- 1.10 Cabinet members contributed expertise in policy development, legal compliance, public health, and community engagement.
- 1.11 Externally, statutory consultees such as the police and fire authorities were consulted, alongside license holders, local businesses, community groups, faith organisations, and residents. These diverse perspectives ensured that the policy was informed by a wide range of experiences and priorities.
- 1.12 Recognising that many residents and businesses were unaware of the policy or its impact, officers adopted a two-pronged strategy. The first element was a communication plan designed to maximise presence on digital platforms and through printed materials. The second was a consultation plan that captured a variety of outreach methods to raise awareness and encourage participation. This dual approach ensured that engagement was both proactive and accessible.
- 1.13 Formal channels played a key role in meeting statutory requirements and engaging professional stakeholders. Emails were sent to statutory consultees and professional bodies, while website updates and e-newsletters provided transparency and easy access for those already engaged with council communications. Targeted questions during the consultation focused on awareness, impact, and clarity, generating actionable insights that could directly inform policy revisions. These formal methods built credibility and ensured compliance.

- 1.14 Alongside formal channels, community-centric outreach extended engagement beyond the usual voices. Social media campaigns broadened reach to residents and community groups, while QR codes placed in libraries and public spaces enabled quick access to consultation materials. Leaflet distribution through Southwark's Young Advisors targeted youth audiences, and engagement with faith organisations and town centre businesses tapped into trusted networks. These methods demonstrated cultural sensitivity and inclusivity, ensuring that underrepresented groups were actively involved.
- 1.15 Tailored messaging was another critical element of the strategy. Recognising that different audiences have varying levels of awareness and engagement preferences, the council adapted tone and format accordingly. Professional stakeholders received formal, detailed communications, while residents and community groups were approached with clear, relatable language. Collaboration with the Community Harm and Exploitation group and the schools' safeguarding coordinator ensured outreach to vulnerable and youth populations. This tailoring improved trust, relevance, and the quality of feedback.
- 1.16 Accessibility and inclusion were prioritised throughout the process. Feedback mechanisms were designed to be user-friendly, allowing stakeholders to share views easily. The adaptive online and offline strategy ensured messages were clear and accessible, meeting people where they are and using language that resonates. Respondents were asked to rate licensing objectives such as crime prevention, public safety, and protection of children, and were invited to suggest improvements. This approach demonstrated the council's commitment to inclusive governance and produced a more representative policy aligned with Southwark's diverse community.

Summary

- 1.17 As per the requirements of the Act, the council consulted on the revision of its Statement of The Licensing Policy 2026-31. The council complied with all statutory duties through:
- a six-week statutory consultation was held from 19 September to 31 October 2025.
 - engagement channels included online surveys, drop-in sessions, officer visits, leaflet distribution, and targeted outreach engagements.
 - Promotion via email campaigns, website/email banners, and QR codes in libraries.
 - Feedback recorded, analysed, and, where appropriate, incorporated into the final policy draft.

Participation Metrics: The consultation achieved broad engagement through multiple channels:

Channel	Footprint	Responses
Online Survey Responses	51	51
Drop-in Sessions (5 sessions, 3 attendees total)	3	3
Officer Visits	75	75
Emails	11	11

Channel	Footprint	Reviewed by
Digital Footprint Website	unlimited	unknown
Digital Footprint Social Media	Approx. 100,000 over all channels	unknown
Newsletters – Residents, Community Safety and Reg Services	Excess of 1300	unknown
E-Newsletters Town Centre businesses	Approx. 14,000	unknown
Forums - Partnership Tasking Group and Safer Neighbourhood Panels meetings	Approx 50 attendees	unknown
Notification of the policy consultation was also emailed out to 193 registered faith groups and 499 groups registered on Southwark's engagement platform.	193 registered faith groups and 499 groups engagement platform.	unknown

1.18 Key takeaways as follows

- Policy Clarity: Majority of respondents agreed the draft policy was clear and balanced.
- Licensing Objectives: Strong support for maintaining the four statutory objectives.
- Cumulative Impact Areas: Mixed views and need for greater enforcement.
- Late-Night Concerns: Issues raised about noise, safety, and enforcement, which align with the council's ASB review.

Conclusion

- 1.19 The consultation fully complied with legislative requirements, ensuring statutory consultees and the wider community were engaged. The results have informed actionable recommendations and shaped the final Licensing Policy 2026–2031, supporting robust, transparent, and inclusive licensing governance.

Methodology

- 1.1. The London Borough of Southwark is required under Section 5 of the 2003 Act to prepare and publish a statement of licensing policy every five years. The policy statement is expected to set out, for the benefit of applicants, responsible authorities and members of the local community, how the authority intends to approach its licensing responsibilities under the Act. The current policy expires in January 2026, and the new policy will cover the period 2026–2031. This section details the community engagement and communication plans undertaken to undertake the consultation.
- 1.2. Under the Licensing Act 2003, Southwark Council, as the designated local licensing authority, has a statutory duty to consult when preparing or updating its Statement of Licensing Policy. The consultation must have regard to the Secretary of State's guidance issued under Section 182 of the Licensing Act, and the policy must promote the following four licensing objectives:
 - The prevention of crime and disorder
 - Public safety
 - The prevention of public nuisance
 - The protection of children from harm
- 1.3 The purpose of the policy is to:
 - To reinforce legal context for decision-makers to guide applicants and stakeholders; and set out the parameters under which the authority will make licensing decisions, offering clarity to prospective applicants, responsible authorities, residents, and licensed operators.
 - To inform operational expectations - helping prospective licensees understand how a licensed premises is likely to be able to operate within the borough.
 - To address community and business needs - It informs both residents and licensed operators about how their needs and concerns will be considered in licensing decisions.
 - To reduce legal challenges - It aims to minimise the number of licensing decisions that may be subject to legal challenge, by ensuring transparency and consistency in decision-making.
- 1.4 The policy seeks to provide the necessary balance between responsible business operators contributing towards a thriving business and a late-night economy, whilst ensuring that the quality of life of those who live and work in the Borough is protected and enhanced through the licensing system.

2. Consultation Objectives

- 2.1 The objectives of the consultation were to:
 - Ensure compliance with statutory requirements for public consultation.
 - Engage residents, businesses, and community groups to gather feedback.
 - Promote inclusivity and accessibility through multiple engagement channels.

- 2.2 To achieve these objectives, a comprehensive consultation engagement plan was undertaken, which was designed to increase awareness of the process among Southwark businesses, residents and communities, provide easy access to the online survey and detailed consultation information, and maximise engagement through multiple communication channels to ensure diverse community participation.
- 2.3 The consultation was also designed to be inclusive with the purpose of engaging and seeking feedback from various stakeholders, businesses, residents and communities on Southwark Council's Statement of Licensing Policy under the Licensing Act 2003.
- 2.4 Stakeholders were identified using a mix of legal requirements, local knowledge, and community insight. This included:
- Statutory bodies as required by the Licensing Act 2003.
 - Council teams and partners involved in community safety, public health, and enforcement.
 - Businesses and licence holders, including pubs, clubs, off-licences, and event organisers.
 - Residents and community groups, especially in areas with known licensing concerns.
 - Workshops to identify additional groups to reach a wider audience, including existing licence holders and Southwark's community.
 - Community engagement team – discussions to identify communities.
 - Consultation team – discussions to identify communities and faith groups to communicate with.
 - Working with local networks and trusted partners to reach a greater audience
- 2.5 To ensure we reached a wider audience, a communication plan and community engagement plan was produced, identifying various methods and channels of communication. This included:
- Stakeholder mailing lists
 - Mailing list to all licence holders.
 - Mailing list to Town Centre residents and businesses
 - In-person attendance and distribution of QR codes.
 - Social media via the council's Twitter account, Facebook.
 - The council's webpage and the council's consultation hub.
 - Press release.
 - Personal LinkedIn.
 - Providing QR codes at all libraries within LBS to reach wider audiences and communities.
- 2.6 The engagement process was set out in two phases:
- Phase one - a preliminary stakeholder engagement to inform and shape the draft policy
- Stakeholder consultation, workshops and meetings were held with a range of partners, including responsible authorities, public health, licensing committee and police. These sessions provided a platform for sharing insights into key issues such as noise, anti-social behaviour, and business needs.
 - Officers attended local Safer Neighbourhood Panel meetings and planned action days with community safety. These meetings flagged concerns such as late-night disturbances and informed the officers where better communication about licensing might be needed.

The process enabled stakeholders to contribute their expertise, and by working together, the council and its partners identified approaches and achieved consensus around policy priorities. This approach helped shape the policy revision before the formal public consultation took place.

Phase Two – statutory consultation (6 weeks)

This was the main consultation period, which was open to all members of the public and stakeholder organisations. Respondents were asked a series of questions focused on awareness of the licensing policy, its perceived impact on local communities, and the clarity and fairness of its objectives. They were asked to rate the importance of licensing objectives such as crime prevention, public safety, and protection of children. They were also invited to suggest improvements and comment on the policy's understanding.

- 2.7 A 6-week statutory public consultation took place from 19 September to 31 October 2025 on the Statement of Licensing Policy.
- 2.8 The consultation undertaken sought to gather feedback from residents, businesses, and stakeholders on the Licensing Policy under the Licensing Act 2003. This involved:

Diverse Target Groups	Engagement includes officials, authorities, community leaders, businesses, residents, and faith groups to ensure wide representation.
Effective Communication Channels	Multiple channels, such as mailing lists, social media, websites, QR codes, public events and press releases, were used to reach stakeholders and to increase awareness and understanding.
Engagement Activities	surveys, direct outreach, and events for participation and gathering comprehensive community feedback.
Statutory consultees	The chief officer of police for the licensing authority's area, the fire authority, representatives of holders of premises licences and club premises certificates, representatives of holders of personal licences and representatives of businesses and residents in its area.
Other	Safer Neighbourhood Panels, neighbouring authorities, officer engagements during visits conducted and with businesses in Town centres, LBS councillors, all current licence holders within the borough.

3. In-Person Engagement

- 3.1 Throughout the consultation process, various stakeholders' meetings were held to discuss and promote awareness of the policy, and officers collaborated with community safety during public events held to promote women's safety and to raise awareness of the policy.
- 3.2 Five drop-in sessions were held across council offices at Tooley Street and Queens Road to engage with businesses, residents and communities to answer questions and encourage participation regarding the licensing policy review.
- 3.3 Forums, Partnership Tasking Group and Safer Neighbourhood Panels meetings were attended by officers to raise awareness of the policy consultation, changes undertaken and to encourage promotion of the policy to others within their networks.

- 3.4 Officers engaged with businesses during inspections and visits around the borough and collaborated with Town Centre Leads within the borough's town centres to engage directly with them concerning the policy review, completing surveys and providing information on how to access the consultation online.
- 3.5 Collaborative work was undertaken with Southwark's Young Advisors team, engaging in their services to distribute consultation leaflets within the community, aiming to expand our reach among the youth in Southwark.

4. Digital & Print Promotion

- 4.1 QR codes were placed across all Southwark libraries to provide residents with quick and easy access to the online survey and full consultation details. The QR code provided a convenient entry point for residents to participate in the consultation.
- 4.2 Information about the consultation was shared through multiple established channels, including Town Centre e-newsletters and Safeguarding Bulletins.
- 4.3 Leveraging multiple communication channels ensured that information reached a wide audience, including those who engage through print, email, and digital platforms
- 4.4 The consultation was actively promoted via The Southwark Council website, social media campaigns, such as Facebook and X and Newsletters and Town Centre e-newsletters. This increased visibility across social media and newsletters encouraged participation and feedback.

5. Email Communications

- 5.1 The consultation included engagements with both statutory and non-statutory stakeholders and email notifications, which provided details of the consultation, online consultation webpage link and QR codes were sent to all statutory consultees, including all LBS Councillors, Responsible Authorities, neighbouring boroughs, all LBS licence holders, Citizens Advice, Urban Health, local schools and safeguarding leads, community and faith groups.
- 5.2 Notification of the policy consultation was also emailed out to 193 registered faith groups and 499 groups registered on Southwark's engagement platform.
- 5.3 With support from the consultation team emails were sent to various diverse community outreach groups, namely:
 - LOVO (Ladies of Virtue) – Women's group
 - Aaina Women's Group – BAME Women's Group – based in Peckham
 - Pecan – VCS Organisation that supports residents and Women's Group – Peckham
 - Blackfriars – VCS group- community sessions/workshops/ advice centre for Southwark residents

- SGTO – (TRAs) – Southwark Group of Tenant Organisations. (Tenants and Residents Association) –
- ASKI – BAME (older persons organisation in Peckham)
- CBACE – contacts – BAME older persons community groups in Southwark.
 - ▶ Golden Oldies
 - ▶ Age Concern
 - ▶ Time and Talents

A policy consultation banner was also added to officers' Email signatures to promote consultation.

6. Online Promotion

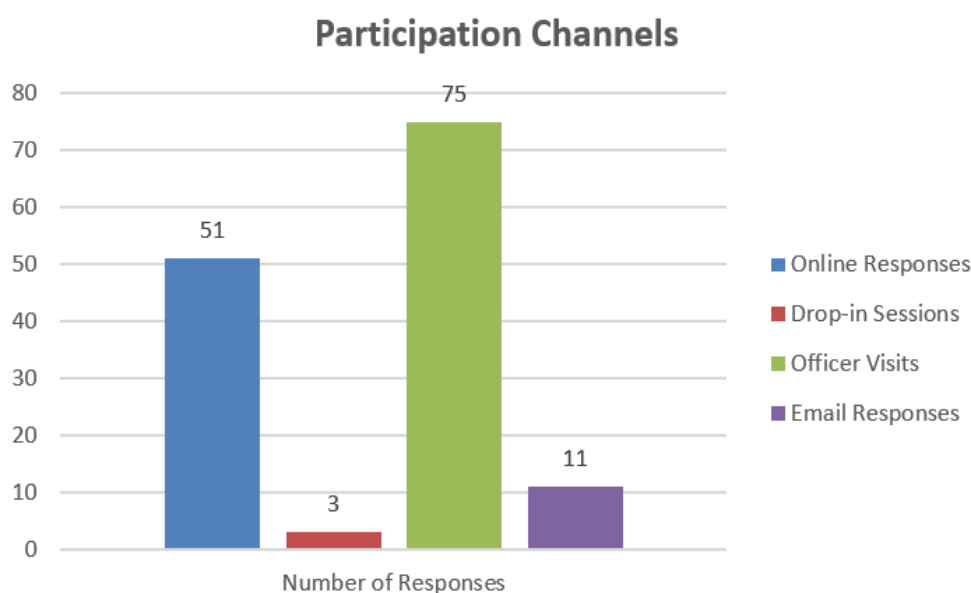
- 6.1 A formal consultation webpage was created, providing further information on the policy changes and updates and extension of the Late Night Levy to include late night refreshment premises operating between 00:00 (midnight) and 06:00.
- 6.2 This webpage provided information concerning policy changes made, extension of the late night levy, a link to the current policy, a copy of the revised draft 2026-31 policy, details of drop-in sessions being held during the consultation, and an online survey for participants to complete.
- 6.3 The online survey sought to highlight the importance of the policy within the borough, with key messaging “Your views matter” – help shape licensing in Southwark. Emphasis was placed on fairness, inclusion, and community safety. Encouraging participation from all residents and businesses.

Summary Table of Engagement Actions

Activity Type	Details
Drop-in Sessions	Queens Road, Tooley Street – officers engaged with residents.
Leaflet Distribution	Libraries across Southwark with QR codes for online consultation and an online survey.
Email Outreach	Councillors, Responsible Authorities, schools, community and faith groups.
Officer Visits	Licensed premises used questionnaires and/or referred to the dedicated consultation page for feedback.
Online Promotion	Licensing webpage banner, QR codes, and email signatures updated.

7. Consultation Results

- 7.1 The consultation took place from 19 September to 31 October 2025 and aimed to gather views from residents, businesses, and community groups. The statutory consultation received responses from a broad range of stakeholders, including residents, businesses, Responsible Authorities, and community groups.
- 7.2 The consultation achieved broad engagement through various channels. Below is the breakdown of participation by channel and feedback themes.
- 7.3 The chart below shows the feedback received from the consultation across 4 segments: online responses, drop-in sessions, email responses and officer visits.



Online Survey Results

- 7.4 The online platform provided a simple process, making the consultation more accessible and inclusive for all, allowing for broader participation, community engagement and supporting democratic accountability by including diverse perspectives. It also represented a transparent and efficient way to collect, analyse responses.

About you 51/51 responses	
2. Are you..... 51/51 - Multiple choice - choose many - required This helps us to understand who we are reaching with our public surveys. Resident 66.7% (34 choices) Business 23.5% (12 choices) Community Group 7.8% (4 choices) Licence Holder 5.9% (3 choices) Licensing Consultant 3.9% (2 choices) Legal Representative (Licensing) 0% (0 choices) Other (please specify) 7.8% (4 choices)	Respondents represent a range of stakeholders, including councillors (some with specific portfolios such as climate emergency, jobs, and business), political groups (Southwark Liberal Democrats), and public health professionals. The most common trend is that feedback is coming from individuals with a professional or organisational interest in licensing policy, rather than from private residents or business owners. This suggests that the consultation is engaging key institutional voices, particularly those concerned with public health, local governance, and political oversight. No detailed policy comments or specific issues have been raised in these responses, but the diversity of roles indicates a broad interest in how licensing policy intersects with public health, business, and local political priorities.
3. Are you aware that Southwark has a licensing Policy? 51/51 - Multiple choice - choose one - optional Yes 78.4% (40 choices) Not Sure 11.8% (6 choices) No 9.8% (5 choices)	4. If yes, where did you hear about it? 19/51 - Short answer - optional Most respondents mentioned hearing about Southwark's licensing policy consultation through council communications, such as council emails or previous consultations on licence applications. Residents' meetings, particularly those addressing anti-social behaviour (ASB) issues in Camberwell Green, were also cited as sources of information. There was also a mention of awareness due to legal requirements. Overall, council channels and meetings are the main ways people hear about licensing policy consultations, which were covered under this consultation.
5. How do you think licensing affects you and your local area? 40/51 - Long answer - optional	82% of respondents raised concerns about antisocial behaviour (ASB), noise, and public nuisance linked to licensed premises, particularly late-night venues and off-licences. Many mentioned issues such as loud music, fighting, shouting, public urination, littering, and violence. Several respondents specifically highlighted problems around off-licences selling alcohol late and the resulting gatherings and block parties, which disrupt sleep and create safety concerns. There was frustration about a lack of effective enforcement and unclear council directives on how to report breaches or influence licensing decisions. Some felt their complaints were ignored or not acted upon by authorities. Concerns were also raised about the proliferation of fast-food outlets, particularly on Walworth Road, with respondents noting negative impacts on the high street's vibrancy and cleanliness due to refuse and unhealthy food options. A minority view suggested that more licensed premises could actually improve social cohesion and vibrancy in the borough, arguing that noise is an expected part of central London life and that licensed venues do not necessarily increase ASB as much as perceived. One

	respondent emphasised the importance of a well-implemented licensing policy to protect residents from nuisance. Overall, the dominant themes were concerns about ASB, noise, safety, ineffective enforcement, and the negative impact of certain licensed premises on local quality of life.
6. Are there specific issues related to licensed premises in your area that concern you? 37/51 - Long answer - optional	Respondents most frequently raised concerns about noise from licensed premises, particularly late at night, which disrupts residents' quality of life. Anti-social behaviour (ASB), including arguing, shouting, violence, and drug use near off-licences and parks, was also a common concern. Respondents highlighted issues with underage drinking and littering, such as laughing gas canisters and rubbish left outside licensed premises. There was a repeated perception that licensing limitations are not respected and that enforcement by the council and police is lacking or invisible.

Draft Licensing Policy 2026/31 - Policy and Content

48/51 responses

7. Is the policy clear and easily understood? 47/51 - Multiple choice - choose one - optional Somewhat agree 41.2% (21 choices) Neither agree nor disagree 21.6% (11 choices) Strongly agree 11.8% (6 choices) Somewhat disagree 9.8% (5 choices) Strongly disagree 7.8% (4 choices) No answer 7.8% (4 choices)	8. Are the amendments to the policy balanced, fair and reasonable? 48/51 - Multiple choice - choose one - optional Neither agree nor disagree 31.4% (16 choices) Somewhat disagree 29.4% (15 choices) Somewhat agree 19.6% (10 choices) Strongly agree 11.8% (6 choices) No answer 7.8% (4 choices) Strongly disagree 0% (0 choices)
9. Does the policy clearly set out the authority approach to maintaining and upholding the licensing objectives as set out by statute? 45/51 - Multiple choice - choose one - optional - Prevention of crime and disorder - Public safety - Prevention of public nuisance - Protection of children from harm Somewhat agree 29.4% (15 choices) Neither agree nor disagree 19.6% (10 choices) Somewhat disagree 17.6% (9 choices) Strongly agree 13.7% (7 choices) No answer 11.8% (6 choices) Strongly disagree 7.8% (4 choices)	

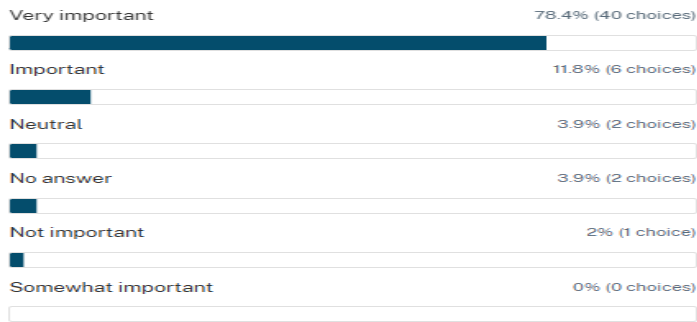
More than half of respondents indicated that the policy was clear and easily understood, while only 17% disagreed with this statement. Regarding the fairness and balance of the amendments, one third of respondents felt the changes were not balanced, fair, or reasonable. Notably, approximately 60% of respondents agreed that the policy clearly sets out the authority's approach to maintaining and upholding the statutory licensing objectives, although 20% remained unsure.

10. What changes would you like to see, and how do you think these will support local business and residents? 36/51-Long answer -optional	Many respondents expressed concerns about late-night licences and alcohol sales, particularly in residential areas, with several calling for stricter controls or a complete stop to late drinking and all-night sales. There were repeated requests for clearer processes for residents to complain about breaches and for licensees to understand their responsibilities, including more transparency and follow-up from the council. Some respondents highlighted the need to balance residents' rights to peace and quiet with the desire for safe and enjoyable late-night experiences, suggesting that complaints should only trigger action when there is unreasonable disturbance. Concerns were also raised about the proliferation of fast-food retailers and specific issues with off-licences in certain estates.
11. Do you have any other comments or suggestions regarding the licensing policy? 26/51-Long answer -optional	Many respondents expressed concerns about the negative impact of late-night licensed premises, particularly bars, pubs, and off-licences, on residents and public safety. There were repeated calls for stricter policies on opening hours, with suggestions to limit alcohol sales and close establishments by 11 pm to help reduce crime, anti-social behaviour, and disturbances. Several comments highlighted issues with enforcement, stating that licence conditions are often ignored and not properly monitored, leading to ongoing problems for residents. There was a sense that the current policy does not adequately address residents' concerns or the root causes of nuisance and crime, and that businesses abusing the system are not deterred. Some respondents called for more focus on tackling crime and anti-social behaviour in specific areas, such as Camberwell. A few responses emphasised the need for a fairer balance, recognising the social, cultural, and employment benefits of licensed activities, and suggested the policy should not be overly restrictive. Technical and procedural issues were raised, including the requirement for scale plans and transfers during reviews. Concerns were also raised about the need to submit both existing and proposed plans for variations when only proposed plans are necessary, adding that it was noted that plans were omitted from licences and should be included. Overall, the most common themes were concerns about late-night alcohol sales, enforcement of licence conditions, and the impact on residents and public safety.
Licensing objectives 49/51 responses	

12. How important are the four licensing objectives to you?

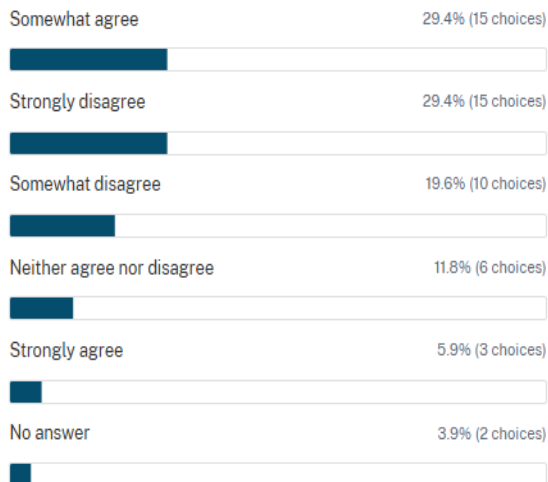
49/51 - Multiple choice - choose one - optional

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



13. Do you think the licensing objectives are met in your area?

49/51 - Multiple choice - choose one - optional



14. Please explain your answer

26/51 - Long answer - optional

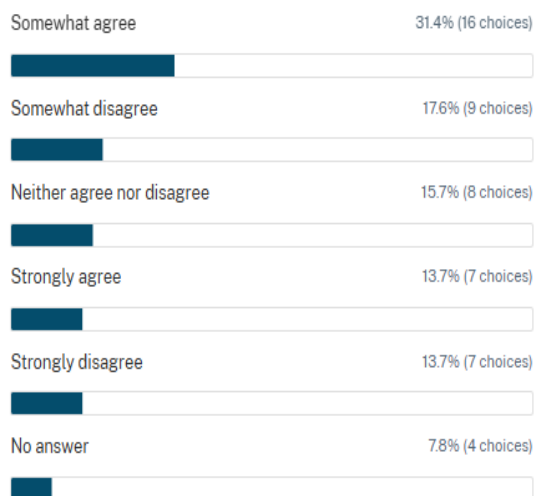
Respondents most frequently raised concerns about noise nuisance and anti-social behaviour (ASB) linked to licensed premises, particularly those with late or 24-hour alcohol sales. Many felt that current licensing is not effectively monitored or enforced, leading to persistent problems with crime, disorder, and public nuisance, especially in areas like Camberwell and around Rye Lane. Several respondents highlighted a lack of communication or visible action from the council or authorities after complaints are made.

There were also concerns that the licensing process is too complicated, favouring larger businesses over local ones, and that not enough attention is paid to residents' needs. Some respondents specifically mentioned issues with certain types of businesses (e.g. vape shops, off-licences) attracting problematic behaviour.

Overall, the dominant themes were dissatisfaction with enforcement, concerns about noise and ASB, and a desire for more effective action and consideration for local residents.

15. Do you feel the licensing policy addresses the four objectives?

48/51 - Multiple choice - choose one - optional



16. Please explain your answer

20/51 - Long answer - optional

Many respondents expressed concerns about insufficient enforcement and a lack of resources to support the licensing policy, particularly in relation to police and council teams being unable to address breaches, noise, and anti-social behaviour (ASB) effectively. Several highlighted that businesses exploit this lack of enforcement, leading to increased crime, disorder, and public nuisance, with residents feeling demoralised and unsupported.

There was repeated mention of alcohol-related issues, including the negative impact of off-licences near residential areas and parks, contributing to ASB and making neighbourhoods feel unsafe. Some respondents felt the policy does not do enough to curb problematic alcohol sales or address the resulting disorder.

Some responses criticised the policy for being too vague or lacking explicit measures in detail. There were calls for the policy to clearly set out recommended conditions and practical steps for applicants, as well as for more tailored approaches to different types of venues and events.

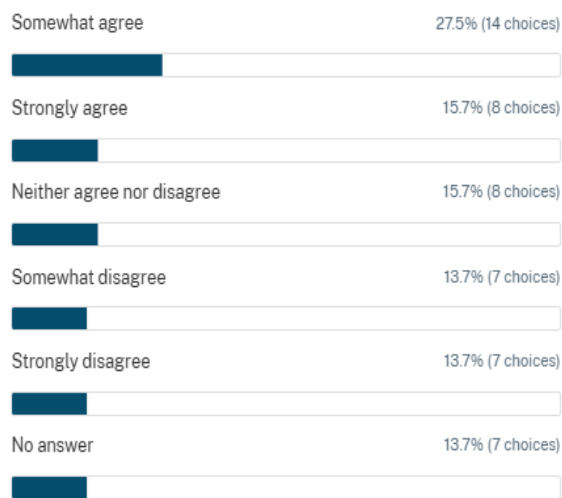
A minority of responses noted that the policy provides a solid foundation or broadly supports the licensing objectives. There were also comments about the balance between regulation and the benefits licensed premises bring to society, with some suggesting that overly restrictive measures (such as on late-night food) may have unintended negative consequences.

Overall, the most common themes were the lack of effective enforcement, ongoing alcohol-related ASB, and the need for more practical, explicit measures to protect residents and support the licensing objectives.

Accessibility and Diversity 44/51 responses

17. Do you think licensing policy easily accessible?

44/51 - Multiple choice - choose one - optional



18. How can we improve communication and engagement with the local community?

32/51 - Long answer - optional

There were no direct concerns relating to accessibility. Respondents mentioned in general terms that communication materials are too lengthy, with one stating that they received 80 pages to review before a licence application hearing meeting, making it difficult for residents to engage without significant time and effort. There is a clear call for clearer, more concise documents and better summaries.

Several respondents suggested using newsletters and emails to keep the community informed, with one specifically mentioning updates via the Southwark Council newsletter.

There is also a desire for communication to focus more on real, local issues such as crime, public drinking, squatting, littering, homelessness, traffic reduction, and environmental improvements. Respondents want updates on how these problems are being addressed, preferably through social media and newsletters.

Overall, the main trends are requests for simpler, more accessible information and more relevant updates on tangible local issues.

19. How could we improve engagement with residents?

31/51 - Long answer - optional

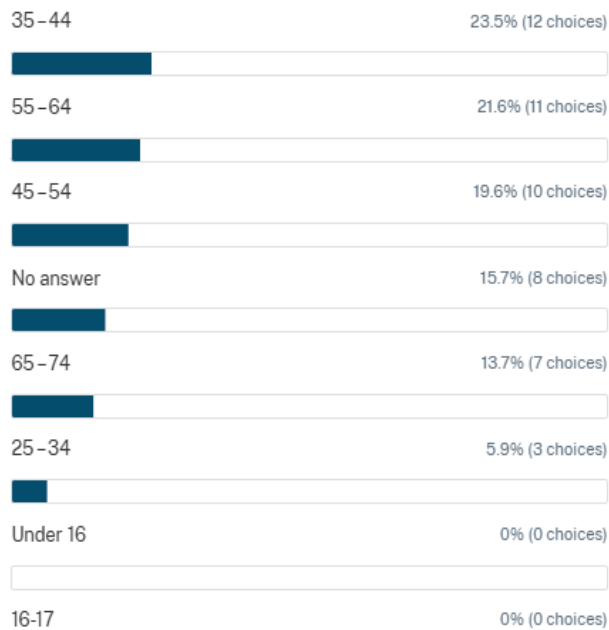
Respondents most frequently emphasised the need for the council to genuinely listen to residents and respond to their concerns, with several expressing frustration at feeling ignored or neglected. There is a strong desire for clearer, simpler communication, including concise policies and summaries, as well as straightforward guidance on how residents can report issues or breaches. Some respondents called for more direct power for residents to object to licensing applications, rather than leaving decisions solely to councillors.

A notable comment highlighted a lack of visible action from the council, particularly in Camberwell, with calls for improvements such as more trees, reduced traffic, speed bumps, and addressing noise and anti-social behaviour. The sense of being overlooked and the need for tangible improvements were stressed as key to rebuilding trust and engagement.

Demographics

20. Age

43/51 - Multiple choice - choose one - optional

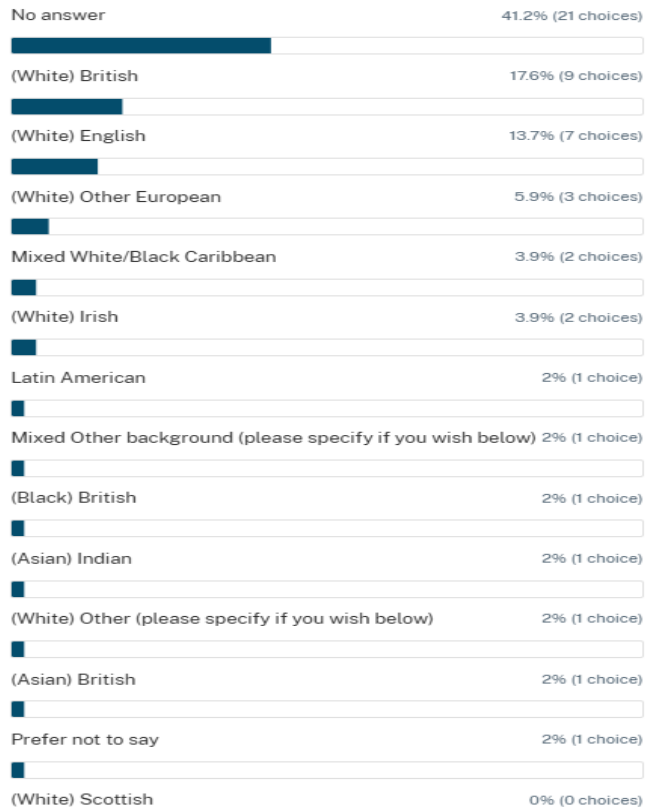


22. If Other, please specify further if you wish

0/51 - Short answer - optional

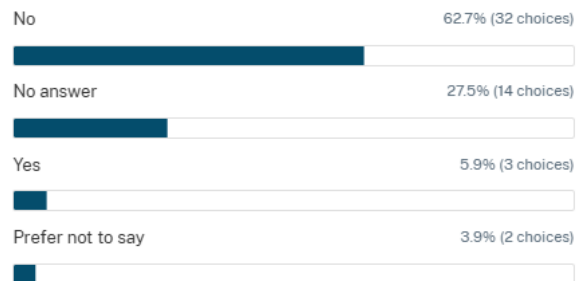
21. What is your ethnic background?

30/51 - Multiple choice - choose one - optional



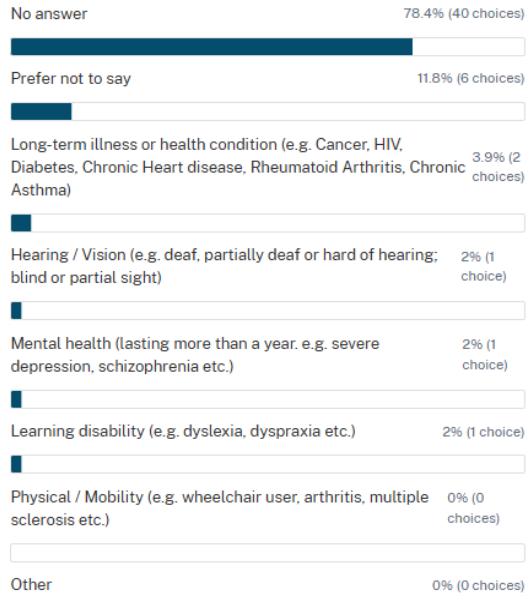
23. Are you disabled?

38/51 - Multiple choice - choose one - optional



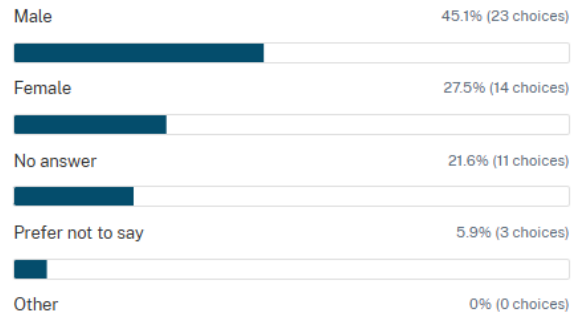
24. Please tick the box or boxes below that best describe your disability:

11/51 - Multiple choice - choose many - optional

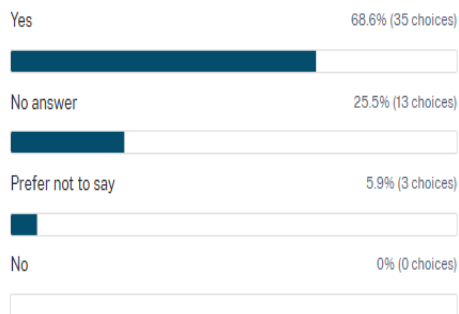
**25. What is your sex as recorded at birth?**

40/51 - Multiple choice - choose one - optional

(A question about Gender Identity will follow)

**26. Is the Gender you identify with the same as the sex you were recorded at birth?**

38/51 - Multiple choice - choose one - optional

**27. If no, how would you define your gender identity? Please specify if you wish**

3/51 - Short answer - optional

All responses (3)

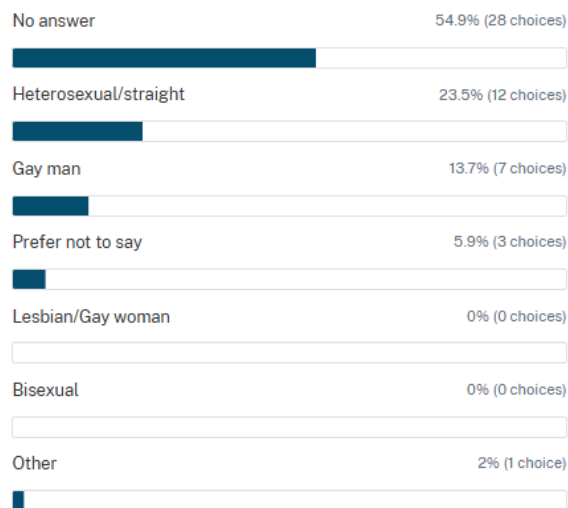
Male

Male

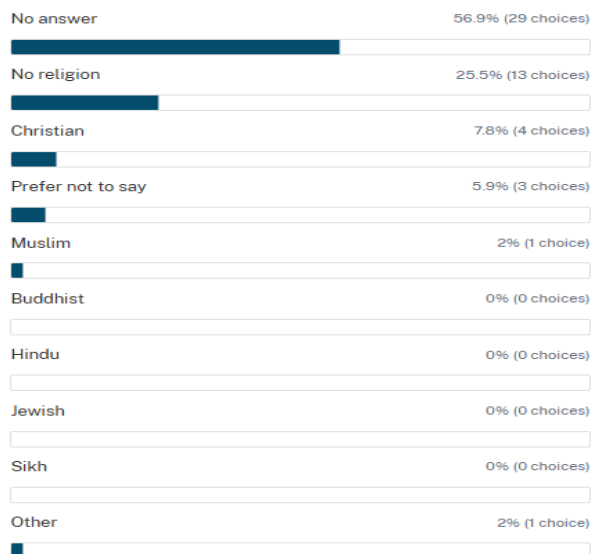
Not sure

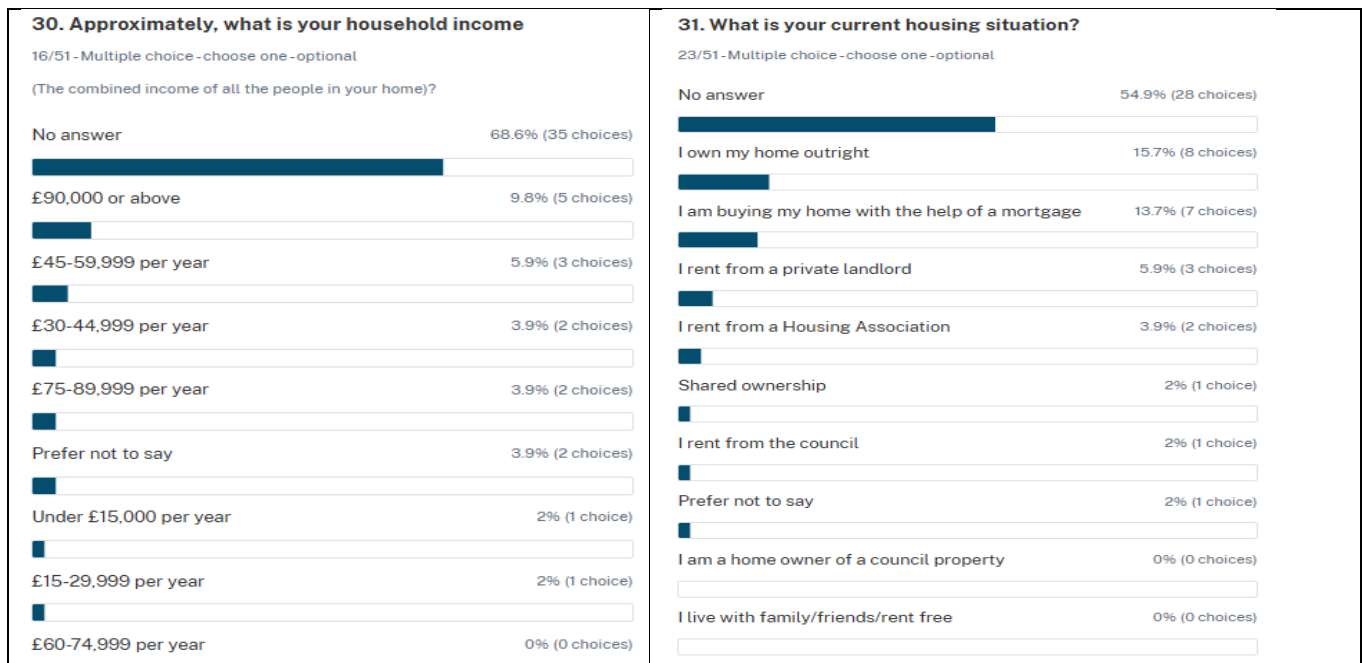
28. Which of the following best describes your sexual orientation?

23/51 - Multiple choice - choose one - optional

**29. What is your religion or belief?**

22/51 - Multiple choice - choose one - optional





Drop-in Sessions

- 7.5 During the consultation period, 5 in-person drop-in sessions were held across the Council offices in Tooley Street and Queen's Road. This process provided opportunities for businesses, residents and stakeholders to attend at their convenience without a prior appointment to ask questions and provide feedback.
- 7.6 All those who attended raised concerns around the ASB and the lack of enforcement concerning late-night off-licences within their area.

Email responses

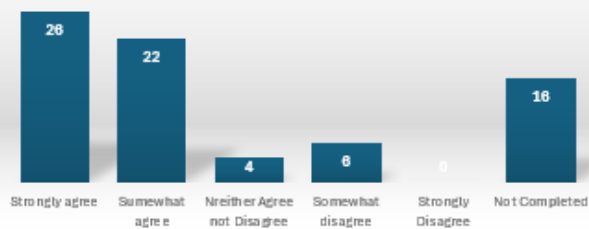
- 7.7 Some respondents raised matters relating to the extent of the boundaries concerning the current cumulative impact areas, while others related to grammatical clarity/corrections within the policy. One respondent expressed concerns about the later closing times for convenience stores and off-licences in residential areas, pointing out that there are many high streets where alcohol can be purchased late at night. Whilst another respondent expressed concerns about the fairness of late-night levy fees being based on business rates. Unfortunately, these fees are determined by statute and are beyond the control of any local licensing authority
- 7.8 Most respondents raised concerns regarding an over-saturation of licensed premises and the lack of responsibility from the businesses, breaches in licensing conditions and the lack of enforcement in the borough. Overall, concerns relating to issues from late-night activities such as noise, ASB, vandalism, theft, overflowing bins and public safety were raised, with some referencing the need for standard conditions on licences and tightening the Temporary Event Notice process.

Officer Visit Results

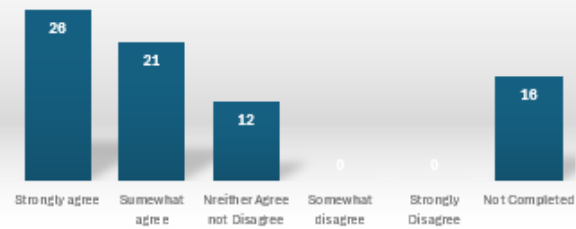
7.9 During the consultation period, officers engaged with businesses on the policy revision during visits and inspections undertaken. This form of personal engagement served to gather diverse, real-life insights, build trust and legitimacy, and empower individuals to influence their views concerning the policy. This approach sought to go beyond simply collecting opinions but to foster a meaningful, two-way dialogue. The survey results are detailed below.



Do you think the licensing objectives are being met in your area?



Do you feel the licensing policy addresses the four objectives?

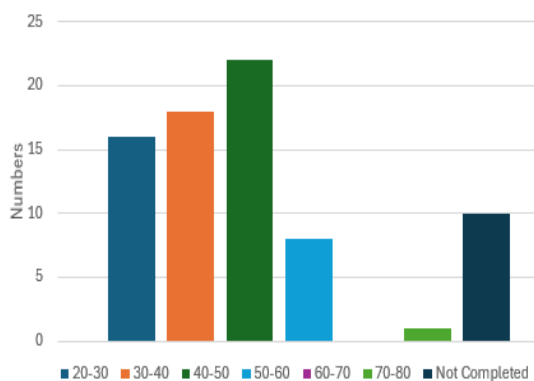


Q. Do you have any other comments or suggestions regarding the licensing policy?

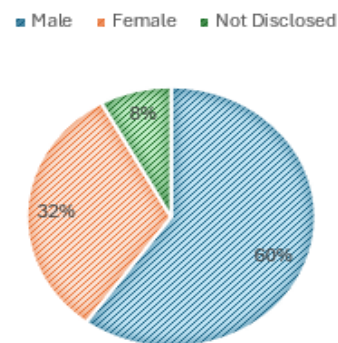
Most respondents offered no additional comments; however, a small minority expressed a desire for extended operating hours to better cater to the vibrant nightlife of the diverse community, referencing that SIA requirements as stringent and a financial cost on the business.

Demographics

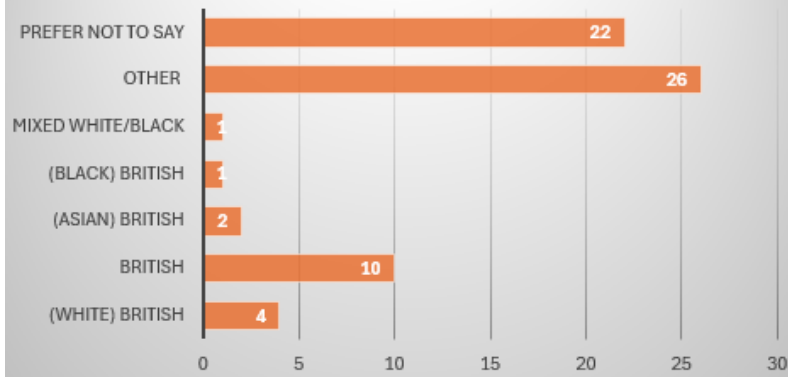
Officer Engagements - Age



GENDER



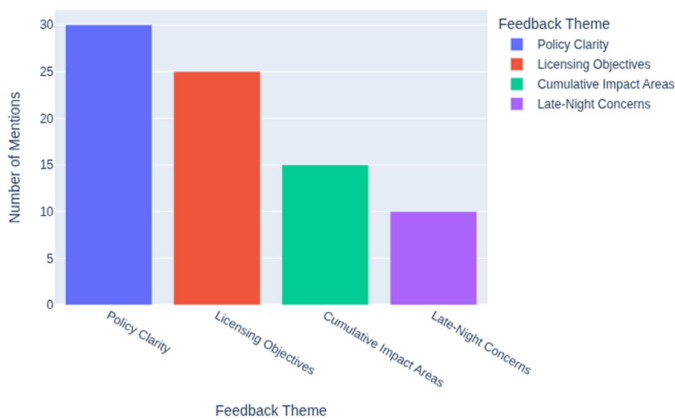
What is your ethnic background?



Key Themes

The main themes identified from the consultation feedback were as follows:

Feedback Themes



Policy Clarity: Majority of the respondents agreed the draft policy was clear, fair and balanced.

Licensing Objectives: Strong support for maintaining the four licensing objectives.

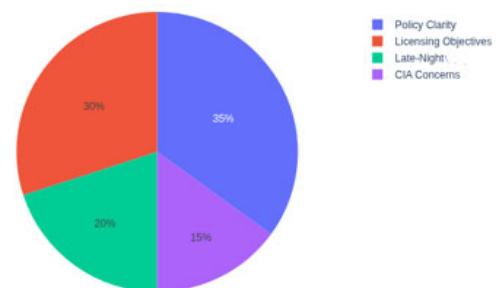
Cumulative Impact Areas: Concerns raised about the lack of enforcement and compliance in CIAs.

Late-Night Concerns: Concerns about the noise, lack of enforcement and public safety.

The majority of the respondents' feedback was that the policy overall provided clarity and was clear on the licensing objectives (65%).

Respondents also highlighted the concerns with the ABS and lack of enforcement within the Cumulative Impact Areas and late at night in general.

Feedback Themes



Conclusion

The Licensing Policy Consultation for 2026–2031 was conducted in full compliance with statutory requirements, employing a comprehensive multi-channel engagement strategy to ensure inclusive participation from residents, businesses, key stakeholders and the community.

The consultation process has highlighted several operational concerns, particularly relating to the lack of enforcement. It is important to note that these issues are operational in nature and do not impact the substance or direction of the revised licensing policy. The overall response to the policy itself has been positive.

By acknowledging these operational matters separately from policy considerations, we can focus on refining our internal processes and improving service delivery. This distinction allows us to maintain

the integrity of the revised policy while proactively addressing practical challenges, ensuring continued progress and responsiveness to stakeholder feedback.

Strong Support for Policy Clarity, Balance and Structure. The majority of respondents agreed that the draft policy was clear, well-structured, and balanced. This clarity was seen as essential for both applicants and residents, ensuring that expectations and requirements are transparent and accessible.

Endorsement of Licensing Objectives. There was robust support for maintaining the four statutory licensing objectives. Respondents recognised these objectives as fundamental to promoting public safety, preventing crime and disorder, protecting children from harm, and minimising public nuisance. The policy's continued emphasis on these objectives was widely welcomed.

Inclusive and Effective Engagement. The multi-channel approach to consultation—encompassing online surveys, in-person sessions, officer visits, and targeted outreach—was positively received. Stakeholders appreciated the council's efforts to make the process accessible and inclusive, enabling a broad spectrum of voices to be heard, including residents, businesses, community groups, and statutory consultees.

Overall Feedback. Many respondents acknowledged the policy's solid foundation and its potential to support a vibrant, safe, and inclusive local economy. However, while the consultation has brought to light significant concerns regarding late-night licensed premises, anti-social behaviour, noise, and the perceived lack of effective enforcement—particularly in cumulative impact areas—it is clear that these issues matter deeply to our community. Respondents have also emphasised the need for clearer communication and greater transparency in enforcement and complaint processes.

Recognising these concerns, we are committed to taking positive steps forward. We will prioritise enhanced enforcement measures, improve communication channels, and ensure transparency throughout our complaint procedures. By addressing these challenges collaboratively, we aim to foster a safer, more responsive environment for all residents and businesses.



Equality Impact and Needs Analysis

Statement of Licensing Policy 2026 - 2031

Guidance notes

Things to remember:

Under the Public Sector Equality Duty (PSED) public authorities are required to have due regard to the aims of the general equality duty when making decisions and when setting policies. Understanding the affect of the council's policies and practices on people with different protected characteristics is an important part of complying with the general equality duty. Under the PSED the council must ensure that:

- Decision-makers are aware of the general equality duty's requirements.
- The general equality duty is complied with before and at the time a particular policy is under consideration and when a decision is taken.
- They consciously consider the need to do the things set out in the aims of the general equality duty as an integral part of the decision-making process.
- They have sufficient information to understand the effects of the policy, or the way a function is carried out, on the aims set out in the general equality duty.
- They review policies or decisions, for example, if the make-up of service users changes, as the general equality duty is a continuing duty.
- They take responsibility for complying with the general equality duty in relation to all their relevant functions. Responsibility cannot be delegated to external organisations that are carrying out public functions on their behalf.
- They consciously consider the need to do the things set out in the aims of the general equality duty not only when a policy is developed and decided upon, but when it is being implemented.

Best practice guidance from the Equality and Human Rights Commission recommends that public bodies:

- Consider all the [protected characteristics](#) and all aims of the general equality duty (apart from in relation to marriage and civil partnership, where only the discrimination aim applies).
- Use equality analysis to inform policy as it develops to avoid unnecessary additional activity.
- Focus on the understanding the effects of a policy on equality and any actions needed as a result, not the production of a document.
- Consider how the time and effort involved should relate to the importance of the policy to equality.
- Think about steps to advance equality and good relations as well as eliminate discrimination.
- Use good evidence. Where it isn't available, take steps to gather it (where practical and proportionate).
- Use insights from engagement with employees, service users and others can help provide evidence for equality analysis.

Equality analysis should be referenced in community impact statements in Council reports. Community impact statements are a corporate requirement in all reports to the following meetings: the cabinet, individual decision makers, scrutiny, regulatory committees and community councils. Community impact statements enable decision makers to identify more easily how a decision might affect different communities in Southwark and to consider any implications for equality and diversity.

The public will be able to view and scrutinise any equality analysis undertaken. Equality analysis should therefore be written in a clear and transparent way using plain English. Equality analysis may be published under the council's publishing of equality information, or

be present with divisional/departmental/service business plans. These will be placed on the website for public view under the council's Publications Scheme. All Cabinet reports will also publish related

Equality analysis should be reviewed after a sensible period of time to see if business needs have changed and/or if the effects that were expected have occurred. If not then you will need to consider amending your policy accordingly. This does not mean repeating the equality analysis, but using the experience gained through implementation to check the findings and to make any necessary adjustments.

Engagement with the community is recommended as part of the development of equality analysis. The council's Community Engagement Division and critical friend, the Forum for Equality and Human Rights in Southwark can assist with this (see section below on community engagement and www.southwarkadvice.org.uk).

Whilst the equality analysis is being considered, Southwark Council recommends considering implications arising from socio-economic disadvantage, as socio-economic inequalities have a strong influence on the environment we live and work in. As a major provider of services to Southwark residents, the council has a policy commitment to reduce socio-economic inequalities and this is reflected in its values and aims. For this reason, the council recommends considering impacts/needs arising from socio-economic disadvantage in all equality analyses, not forgetting to include identified potential mitigating actions. **The Council has adopted the Socio-Economic Duty as part of its overall equality, diversity and inclusion policy commitments in the Southwark Equality Framework.** This requires us to ensure we do not make any conditions worse for those experiencing socio-economic disadvantage through our policies and practices.

Section 1: Equality impact and needs analysis details

Proposed policy/decision/business plan to which this equality analysis relates		REVIEW OF SOUTHWARK'S STATEMENT OF LICENSING POLICY 2026 - 2031.			
Equality analysis author		Esther Jones			
Strategic Director:		Aled Richards			
Department		Environment and Leisure	Division	Licensing	
Period analysis undertaken		December 2025			
Date of review (if applicable)					
Sign-off		Position		Date	

Section 2: Brief description of policy

1.1 Brief description of policy

The Licensing Act 2003 (The Act) came into effect on the 24th November 2005 combining numerous pieces of legislation which previously facilitated sale and supply of alcohol, provision of late night food, several forms of entertainment, including theatre and cinema.

With this, the administration of the legislation was passed to the local authorities with a requirement to grant a licence unless reliable information to refuse the application was presented.

During the preparation of the legislation certain risks were identified and parliament prescribed four objectives which applicants and licence holders had to continuously address and show mitigation within an application before a licence could be considered.

The objectives:-

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

Section 5 of 'The Act' requires the Licensing Authority at least 5 years to review and publish a Licensing Policy, Southwark Council published its last policy in 2021

Over time legislative changes within 'The Act', with other legislation or social need will highlight changes needed to the policy. The government periodically produce statutory guidance under Section 182 of 'The Act' the latest version being issues in February 2025.

The Act provides for the three types of authority with a requirement to vary, transfer or review when required.

Premises Licence Part 3 application
Club Personal Licence Part 4 Application
Personal Licence Part 6 Application

Subject to the applicant meeting the requirements within the act officers and elected officers will follow the legislation and this policy to make a determination
Changes to the current policy have been assessed to see if they impact on any 'protected characteristics' of an applicant, persons wishing to use facilities of the licence, or residents of the borough.

The Licensing Authority is confident that it would never deliberately make policy decision that would do this. One of the aims of the consultation will be to identify any groups that may be negatively impacted, whether subjectively or objectively

Section 3: Overview of service users and key stakeholders consulted

2. Service users and stakeholders	
Key users of the department or service	• Premises licence holders • Personal licence holders • Legal representatives • Licensing consultants • Members of the public
Key stakeholders were/are involved in this policy.	The consultation was introduced by email and sent to: • The chief officer of police for the licensing authority's area. • The fire authority for that area. • Representatives of holders of premises licences • Representatives of holders of club premises certificates • Representatives of holders of personal licences • Representatives of businesses and residents in its area. • LBS Councillors • Neighbouring authorities • All Faith Groups and Community Groups from the Southwark Community • All current licence holders • Business Information Districts - Responsible authorities

Section 4: Pre-implementation equality impact and needs analysis

This section considers the potential impacts (positive and negative) on groups with 'protected characteristics', the equality information on which this analysis is based and any mitigating actions to be taken, including improvement actions to promote equality and tackle inequalities. An equality analysis also presents as an opportunity to improve services to meet diverse needs, promote equality, tackle inequalities and promote good community relations. It is not just about addressing negative impacts.

The columns include societal issues (discrimination, exclusion, needs etc.) and socio-economic issues (levels of poverty, employment, income). As the two aspects are heavily interrelated it may not be practical to fill out both columns on all protected characteristics. The aim is, however, to ensure that socio-economic issues are given special consideration, as it is the council's intention to reduce socio-economic inequalities in the borough. Key is also the link between protected characteristics and socio-economic disadvantage, including experiences of multiple disadvantage.

Socio-economic disadvantage may arise from a range of factors, including:

- poverty
- health
- education
- limited social mobility
- housing
- a lack of expectations
- discrimination
- multiple disadvantages

The public sector equality duty (PSED) requires us to find out about and give due consideration to the needs of different protected characteristics in relation to the three parts of the duty:

1. Eliminating discrimination, harassment and victimisation
2. Advancing equality of opportunity, including finding out about and meeting diverse needs of our local communities, addressing disadvantage and barriers to equal access; enabling all voices to be heard in our engagement and consultation undertaken; increasing the participation of underrepresented groups
3. Fostering good community relations; promoting good relations; to be a borough where all feel welcome, included, valued, safe and respected.

The PSED is now also further reinforced in the two additional Fairer Future For All values: that we will

- Always work to make Southwark more equal and just
- Stand against all forms of discrimination and racism

Age - Where this is referred to, it refers to a person belonging to a particular age (e.g. 32-year-olds) or range of ages (e.g. 18 - 30-year-olds).	
Potential impacts (positive and negative) of proposed policy review; this also includes needs in relation to each part of the duty.	Potential Socio-Economic impacts/needs/issues arising from socio-economic disadvantage (positive and negative)
Any policy reviews must take into account protected characteristics. There is anecdotal evidence to suggest that younger independent businesses may be run by younger people. The licensing authority looks to encourage the diversity of local businesses, which would include businesses run by younger entrepreneurs.	Policy review is not intended to benefit or disadvantage people because of their socioeconomic status. It is however acknowledged that there is a continuing trend for increases in business rates and rent costs to all premises adding an additional financial burden to some businesses, which is likely passed on to customers
Equality information on which above analysis is based	Socio-Economic data on which above analysis is based
The last review was in 2018 with no recent update is in the 2020-2022 which is within the 2021 policy document. Southwark is densely populated with a young ethnically diverse population. The ONS mid year population estimate for 2018 estimated the population of Southwark to be 314,200 with 54.6% under 35 years of age. The many regeneration projects include in the Aylesbury estate; Borough, Bankside and London Bridge; Canada Water; Elephant and Castle; Nunhead; and Peckham. The review will not impact on the operator/licence holder's operation and therefore with other changes will have no direct effect on residents and visitors to the borough	Southwark is a diverse Borough with people from a wide range of ethnicities and backgrounds Southwark continues to face the complex social, health and economic needs of an inner-city population. Southwark's level of deprivation has improved in recent years but still remains the 12th most deprived London borough (40th nationally) (2015). Southwark is meeting these challenges and is fast becoming one of London's most dynamic boroughs with 40 per cent of the area currently the subject of physical regeneration projects and with developments valued at around £4 billion.
Mitigating and/or improvement actions to be taken	
Whilst the last census was in 2021, we will work on the data within the last policy and continue to monitor update and assess as available.	

Disability - A person has a disability if s/he has a physical or mental impairment which has a substantial and long-term adverse effect on that person's ability to carry out normal day-to-day activities.

Please note that under the PSED due regard includes:

Giving due consideration in all relevant areas to "the steps involved in meeting the needs of disabled persons that are different from the needs of persons who are not disabled include, in particular, steps to take account of disabled persons' disabilities." This also includes the need to understand and focus on different needs/impacts arising from different disabilities.

Potential impacts (positive and negative) of proposed policy review; this also includes needs in relation to each part of the duty.

[Research shows](#) that in London overall, families that include a disabled person are more likely to be in poverty than families without a disabled person. The research shows that there is a clear trend between the level of deprivation in a neighbourhood and the proportion of the population that is Disabled.

Among London's 10% most deprived neighbourhoods, the average proportion of the population who are Disabled is 15.5%. By contrast, in the 10% least deprived neighbourhoods in London, Disabled people make up an average of 11.7% of the population.

Data from the census shows that half (51%) of all households in Southwark are disadvantaged in any one or more of the following dimensions: employment, education, health and disability, and housing.

Given the above correlation, there is a possibility that a higher percentage of people in circumstances of deprivation to have a disability, therefore this group of people will be less likely to be able to mitigate the possible impact of reduction in opening hours (less likely to have access to computers, printers and quiet warm places to do homework, research and general studying) and therefore they might be more disproportionately affected.

Policy review is not intended to benefit or disadvantage people because of their socioeconomic status. It is however acknowledged that there is a continuing trend for increases in business rates and rent costs to all premises adding an additional financial burden to some businesses, which is likely passed on to customers.

Potential socio-economic impacts/ needs/issues arising from socio-economic disadvantage (positive and negative)

No specific impacts have been identified or raised in relation to this. It is acknowledged that businesses should make 'reasonable adjustments' to accommodate people identifying with having a disability. No health impacts are identified

Equality information on which above analysis is based	Socio-economic data on which above analysis is based
In 2021 census day, almost 1 in 6 (14%) of Southwark residents reported being disabled (based on 2010 Equality Act definitions), a similar proportion to London and England. of these people, over two-fifths (41%, 17,400) reported that their day-to-day activities were limited a lot 18,000 Southwark residents reported having long-term health conditions that did not affect their day-to-day activities A quarter (25%) of all households in Southwark had someone with a disability: 21% of households had 1 disabled member, and 4% had 2 or more disabled members	N/A
Mitigating and/or improvement actions to be taken	
N/A	

Gender reassignment: - The process of transitioning from one gender to another. Gender Identity: Gender identity is the personal sense of one's own gender. Gender identity can correlate with a person's assigned sex or can differ from it.	
Potential impacts (positive and negative) of proposed policy review; this also includes needs in relation to each part of the duty.	Potential socio-economic impacts/ needs/issues arising from socio-economic disadvantage (positive and negative)
This policy review will not specifically benefit or disadvantage non-binary residents or licence holders.	Policy review is not intended to benefit or disadvantage people because of their socioeconomic status. It is however acknowledged that there is a continuing trend for increases in business rates and rent costs to all premises adding an additional financial burden to some businesses, which is likely passed on to customers
Equality information on which above analysis is based.	Socio-economic data on which above analysis is based

Census Data	N/A
Mitigating and/or improvement actions to be taken	
N/A	N/A

Marriage and civil partnership – In England and Wales marriage is no longer restricted to a union between a man and a woman but now includes a marriage between a same-sex couples. Same-sex couples can also have their relationships legally recognised as 'civil partnerships'. Civil partners must not be treated less favourably than married couples and must be treated the same as married couples on a wide range of legal matters. (Only to be considered in respect to the need to eliminate discrimination.)	
Potential impacts (positive and negative) of proposed policy review this also includes needs in relation to each part of the duty.	Potential socio-economic impacts/ needs/issues arising from socio-economic disadvantage (positive and negative)
Any changes to the Licensing (Entertainment and Alcohol) policy will have no impact on marital or civil partnership.	Policy review is not intended to benefit or disadvantage people because of their socioeconomic status. It is however acknowledged that there is a continuing trend for increases in business rates and rent costs to all premises adding an additional financial burden to some businesses, which is likely passed on to customers
Equality information on which above analysis is based	Socio-economic data on which above analysis is based
Census Data	N/A
Mitigating or improvement actions to be taken	
N/A	N/A

Pregnancy and maternity - Pregnancy is the condition of being pregnant or expecting a baby. Maternity refers to the period after the birth, and is linked to maternity leave in the employment context. In the non-work context, protection against maternity discrimination is for 26 weeks after giving birth, and this includes treating a woman unfavourably because she is breastfeeding.	
Potential impacts (positive and negative) of proposed policy review; this also includes needs in relation to each part of the duty.	Potential socio-economic impacts/ needs/issues arising from socio-economic disadvantage (positive and negative)

Licensing Policy must not disadvantage pregnant women or those on maternity leave. No impacts are therefore identified.	Policy review is not intended to benefit or disadvantage people because of their socioeconomic status. It is however acknowledged that there is a continuing trend for increases in business rates and rent costs to all premises adding an additional financial burden to some businesses, which is likely passed on to customers
Equality information on which above analysis is based	Socio-economic data on which above analysis is based
Census Data	N/A
Mitigating and/or improvement actions to be taken	
N/A	N/A

Race - Refers to the protected characteristic of Race. It refers to a group of people defined by their race, colour, and nationality (including citizenship) ethnic or national origins. N.B. Gypsy, Roma and Traveller are recognised racial groups and their needs should be considered alongside all others

Potential impacts (positive and negative) of proposed policy review; this also includes needs in relation to each part of the duty.	Potential socio-economic impacts/ needs/issues arising from socio-economic disadvantage (positive and negative)
The cultural makeup of the Borough is wide and varied. The Licensing Authority would want to encourage this diversity. The policy would never be intended to prevent any particular ethnic group from applying and holding a licence or from enjoying the authorised activities at a licenced (Entertainment and Alcohol) premises. It should however be noted that the Borough is continually changing in terms of regenerating community areas. This has continued to give opportunities for places for social gatherings as new buildings are completed and older facilities repurposed for local amenities. Policy changes not intended to restrict any premises from opening, or remaining open. There may be cross-overs with Planning and Regeneration that may have to address this risk.	<u>The English Indices of Deprivation 2019</u> show that: • Asian people as a whole (15.7%) were the most likely out of all ethnic groups to live in the 10% most deprived neighbourhoods, followed by Black people (15.2%) • White people were the least likely to live in them (9.0%) • Out of the 18 individual ethnic groups, people from the Pakistani (31.1%) and Bangladeshi (19.3%) groups were the most likely to live in them • People from the Indian (7.6%), White Irish (8.1%) and White Other (8.2%) ethnic groups were the least likely to live in them

	Policy review is not intended to benefit or disadvantage people because of their socioeconomic status. It is however acknowledged that there is a continuing trend for increases in business rates and rent costs to all premises adding an additional financial burden to some businesses, which is likely passed on to customers
Equality information on which above analysis is based	Socio-economic data on which above analysis is based
Census Data	N/A
Mitigating and/or improvement actions to be taken	
N/A	N/A

Religion and belief - Religion has the meaning usually given to it but belief includes religious and philosophical beliefs including lack of belief (e.g. Atheism). Generally, a belief should affect your life choices or the way you live for it to be included in the definition.	
Potential impacts (positive and negative) of proposed policy review; this also includes needs in relation to each part of the duty.	Potential socio-economic impacts/ needs/issues arising from socio-economic disadvantage (positive and negative)
Policy review will have no apparent benefit or disadvantage to any particular religion or belief. It should be noted that places of worship are exempt from licensing restrictions, as long as they are not being used for non-religious, commercial purposes.	Policy review is not intended to benefit or disadvantage people because of their socioeconomic status. It is however acknowledged that there is a continuing trend for increases in business rates and rent costs to all premises adding an additional financial burden to some businesses, which is likely passed on to customers
Equality information on which above analysis is based	Socio-economic data on which above analysis is based
Census Data	N/A
Mitigating and/or improvement actions to be taken	
N/A	N/A

Sex - A man or a woman.	
Potential impacts (positive and negative) of proposed policy review; this also includes needs in relation to each part of the duty.	Potential socio-economic impacts/ needs/issues arising from socio-economic disadvantage (positive and negative)
Policy review will have no apparent benefit or disadvantage to any particular sex.	Policy review is not intended to benefit or disadvantage people because of their socioeconomic status. It is however acknowledged that there is a continuing trend for increases in business rates and rent costs to all premises adding an additional financial burden to some businesses, which is likely passed on to customers
Equality information on which above analysis is based	Socio-economic data on which above analysis is based
Census Data	N/A
Mitigating and/or improvement actions to be taken	
N/A	

Sexual orientation - Whether a person's sexual attraction is towards their own sex, the opposite sex or to both sexes	
Potential impacts (positive and negative) of proposed policy; this also includes needs in relation to each part of the duty.	Potential socio-economic impacts/ needs/issues arising from socio-economic disadvantage (positive and negative)
Concerns are ongoing on the impacts that face LGBTIQ+ premises remaining open to provide safe spaces for that community. Significant numbers of premises have closed across London in recent years, yet this is likely to be as a result of commercial redevelopment, rather than a direct intention to reduce the number of such venues. Southwark seeks to protect all such venues. Licensing Policy changes are not intended to prevent any particular group based on LGBTIQ+ self-identification from enjoying alcohol or entertainment at night.	Policy review is not intended to benefit or disadvantage people because of their socioeconomic status. It is however acknowledged that there is a continuing trend for increases in business rates and rent costs to all premises adding an additional financial burden to some businesses, which is likely passed on to customers

Paragraph 162 of the Southwark Statement of Licensing Policy 2021 to 2026 currently under review, states that Members of a Licensing Sub Committee may take into account factors when granting additional licences within a CIA. Members may take steps to grant a premises licence outside of the recommendations of the Policy to promote the use of licensed premises by groups that are not well serviced with licensed premises within the Borough. The groups referenced are those within a protected characteristic.	
Equality information on which above analysis is based	Socio-economic data on which above analysis is based
Census Data	N/A
Mitigating and/or improvement actions to be taken	
N/A	

Human Rights There are 16 rights in the Human Rights Act. Each one is called an Article. They are all taken from the European Convention on Human Rights. The Articles are The right to life, Freedom from torture, inhuman and degrading treatment, Freedom from forced labour , Right to Liberty, Fair trial, Retrospective penalties, Privacy, Freedom of conscience, Freedom of expression, Freedom of assembly, Marriage and family, Freedom from discrimination and the First Protocol
Potential impacts (positive and negative) of proposed policy review.
Diversity is encouraged to ensure a licensing regime that is representative of and meets the needs of the borough's communities. The policy review will not negatively impact residents and business owners. It is acknowledged that increases in rents and rates may result in increased charges and those costs may be passed on to customers. Therefore, those on lower incomes may be adversely impacted on a socio-economic basis.
Information on which above analysis is based
Census Data.
Mitigating and/or improvement actions to be taken
N/A

Section 5: Further equality actions and objectives

5. Further actions

Based on the initial analysis above, please detail the key mitigating and/or improvement actions to promote equality and tackle inequalities; and any areas identified as requiring more detailed analysis.

Number	Description of issue	Action	Timeframe
1	Review of Policy	Review	5 Years

5. Equality and socio-economic objectives (for business plans)

Based on the initial analysis above, please detail any of the equality objectives outlined above that you will set for your division/department/service. Under the objective and measure column please state whether this objective is an existing objective or a suggested addition to the Council Plan.

Objective and measure	Lead officer	Current performance (baseline)	Targets	
			Year 1	Year 2
N/A	N/A	N/A		

Implementation Equality Impact and Needs Analysis

Meeting Name:	Licensing Committee
Date:	29 January 2026
Report title:	Licensing Act 2003: Review of the Cumulative Impact Areas in Southwark.
Ward(s) or groups affected:	All Wards
Classification:	Open
Reason for lateness (if applicable):	Not applicable
From:	Strategic Director of Environment, Sustainability and Leisure

RECOMMENDATION(S)

1. That the Licensing Committee:

- a) Considers the review of the current Cumulative Impact Areas (CIAs) within the borough following an assessment of the data for the current zones and monitoring areas, which is attached to this report and referenced as **Appendix A**, in line with Section 5A of the Licensing Act 2003.
- b) Determines the status of the CIAs, based on data and information contained within the document referenced as **Appendix A**, so as to:
 - i. **Retain** Borough & Bankside as a CIA due to its persistently high density of licensed premises and associated crime.
 - ii. **Designate** Elephant & Castle as a new CIA, reflecting its escalating risk profile and concentration of alcohol-related harm.
 - iii. **Remove** Peckham and Camberwell from CIA status, as both areas demonstrate significant improvements and now present lower risk profiles. Old Kent Road and Walworth show mixed results; indicators suggest that lighter-touch interventions may be more appropriate.
 - iv. **Discontinue** all monitoring areas, as there is no evidence of ongoing risk in any part of the Borough.

2. Guidance¹ sets out the relevant information which licensing authorities may be able to draw upon to evidence the cumulative impact of licensed premises on the promotion of the licensing objectives which may include:
 - Local crime and disorder statistics, including statistics on specific types of crime and crime hotspots.
 - Statistics on local anti-social behaviour offences.
 - Health-related statistics such as alcohol related emergency attendances and hospital admissions.
 - Environmental Health complaints, particularly in relation to noise and litter.
 - Complaints recorded by the Local Authority, which may include complaints raised by residents or residents' associations.
 - Evidence from local councillors.
 - Evidence obtained through local consultation.

BACKGROUND INFORMATION

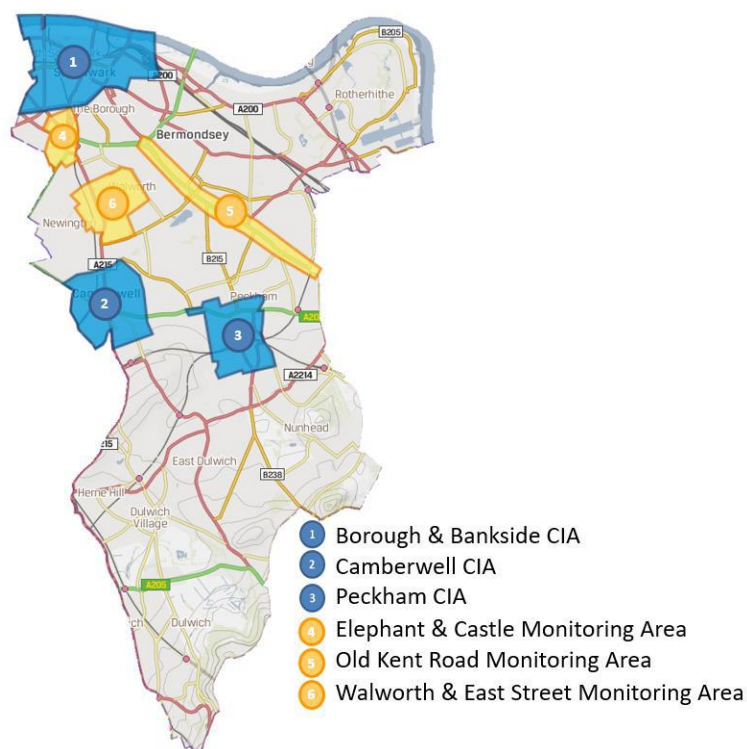
3. The Licensing Act 2003 “the Act” came into effect on 25 November 2005. The Act introduced a legal framework for local authorities to administer and regulate licensable activities, namely, alcohol, regulated entertainment, and late-night refreshment.
4. A Cumulative Impact Area is a designated zone where evidence has indicated that the number, type or type of density of licensed premises is impacting adversely on the licensing objectives, namely, crime and disorder, public safety, public nuisance and the protection of children from harm. This is caused by a significant number of licensed premises clustered in one or more defined geographical areas.
5. The CIA policy places a presumption that any new or variation of licence applications within the defined areas would likely add to the existing cumulative impact and should therefore be refused. The policy allows applicants to rebut the refusal presumption if they can demonstrate that the premises operation would not adversely impact the intention of the policy and add to the existing cumulative impact.
6. The implementation and assessment of a CIA Policy must be based on data specific to alcohol-related crime. The Policy is to be kept under review and is statutorily required to be reviewed every 3 years.
7. The CIAs were introduced to support the Southwark Statement of Licensing Policy aims of reducing the negative impact of alcohol on residents, visitors and businesses in the Borough.
8. Southwark introduced three CIAs between 2008 and 2011, in the areas of Borough and Bankside (2011), Camberwell (2008) and Peckham (2009).

[Revised guidance issued under section 182 of the Licensing Act 2003 \(November 2025\) \(accessible version\) - GOV.UK](#)

There are also three monitoring areas at Elephant & Castle, Walworth and Old Kent Road, which have been monitored since 2011.

9. Southwark's CIAs were last reviewed in 2023. The assessment undertaken did not uncover any new evidence to support the reclassification of any areas as CIAs. However, it did result in the inclusion of Steadman Street within the Elephant and Castle monitoring area.
10. A map of the borough highlighting the areas covered by the current CIA policy is provided below. A list of streets which fall within the current CIAs and for the monitoring area known as Elephant and Castle is referenced as **Appendix B** to this report.

Cumulative Impact Areas within the London Borough of Southwark



KEY ISSUES FOR CONSIDERATION

The purpose of the Cumulative Impact Assessment is as follows:

11. Under the Licensing Act 2003, the Licensing Authority (the council) is required to publish a statement on licensing policy every 5 years. The current Southwark Statement of Licensing Policy runs from 2021 to 2026 and is currently under review.
12. The Licensing Policy must take into account any Cumulative Impact Assessment (CIA) published under section 5A of the Act. If adopted, a licensing authority must review its CIA every 3 years. In the Act, cumulative impact is described as “the potential impact on the promotion of licensing

objectives of a significant number of licensed premises concentrated in one area”.

13. A licensing authority can publish a CIA to help limit the number or types of licence applications granted in areas where there is evidence demonstrating the number or density of licensed premises is having a cumulative impact which undermines the licensing objectives.
14. Where there are CIAs, there is a presumption that any new or variation of licence applications within the defined areas would likely add to the existing cumulative impact and should be refused unless the applicant can demonstrate that there will be no negative cumulative impact on the licensing objectives.
15. The publication of a CIA does not change how licensing decisions are made; the Licensing Authority will always consider each application on its merits. However, a CIA is a strong statement of intent about an authority’s approach to licence applications.
16. CIAs relate to applications for new premises licences and ‘club premises certificates, as well as applications to vary existing premises licences and club premises certificates in a specified area.

SUMMARY OF THE REVIEW

17. The 2025 assessment is informed by a defined set of datasets, including local crime and disorder statistics, and health indicators such as alcohol-related emergency attendances and hospital admissions.
18. It is noted that the licensing authority no longer has in-depth access to police data since the last review undertaken in 2023. In addition, data provided by the police relating to alcohol-related crime records for 2023/2024 is now categorised differently, preventing direct comparisons.
19. To ensure a thorough evidence-based assessment was undertaken, in addition to the crime and ambulance data, the 2025 assessment built on insights from previous assessments and drew on a wide range of data sources.
20. These included Metropolitan Police Service crime statistics, London Ambulance Service (LAS) alcohol-related callouts, and reports of anti-social behaviour (ASB).
21. To ensure a robust approach, we examined methodologies used by other boroughs to inform the datasets applied in our assessment. The review incorporated Southwark’s entire licensing landscape for a borough-wide perspective.
22. For the first time in Southwark, local authority complaints—particularly those linked to licensed premises—were analysed alongside licence

applications and approvals. This comprehensive approach strengthened the evidence base underpinning our policy decisions.

23. We analysed the density of licensed establishments, the types of outlets present, and the volume of licence applications submitted. This provided a clearer and more nuanced understanding of the borough's licensing dynamics.
24. The 2025 assessment built on insights from previous assessments and drew on a wide range of data sources. These included Metropolitan Police Service crime statistics, London Ambulance Service (LAS) alcohol-related callouts, and reports of anti-social behaviour (ASB).
25. It examined how clusters of licensed premises affect the borough's licensing objectives. It analysed trends and identified hotspots for alcohol-related crime, disorder, and nuisance, providing robust evidence to shape Southwark's Statement of Licensing Policy. Crucially, the review aimed to strike a balance—supporting the continued growth of the hospitality sector while safeguarding residents and maintaining public safety.
26. Spatial and temporal techniques were applied to identify high-density areas, crime hotspots, and peak times for incidents.

Peer Review and validation

27. To ensure data integrity and alignment, we worked in collaboration with Public Health and data analyst in Community Safety throughout the CIA review process. This collaboration included sharing detailed information on data sources, collection methods, and how these were applied in the assessment.
28. Public Health undertook a peer review of our methodology and the foundational data sources used for alcohol-related crime analysis within the CIA assessment. These sources align with those employed by their team, ensuring transparency, accuracy, and a shared understanding of the evidence base underpinning our findings.
29. The CIA policy assessment is provided at **Appendix A**.

Community, equalities (including socio-economic) and health impacts

Community impact statement

30. Each application is required under the Act to be considered upon its own individual merits with all relevant matters taken into account.
31. Central to this is a licensing process which aims to be inclusive and ensures that local community concerns are understood, debated and resolved. This is supported by offering broad support to licensees, through

the range of involved authorities, to establish best practice management, and by a strong directed enforcement resource

Equalities (including socio-economic) impact statement

32. Equality impact assessments are an essential tool to assist Councils to comply with the equalities duties and to make decisions fairly. Equalities and human rights impact assessments that are carried out should be mindful of the protected characteristics under the Equality Act 2010.
33. Members will need to consider whether there are any potential negative impacts on the protected characteristics as outlined in the assessment at the Committee Hearing. The current assessment is available in **Appendix C**.
34. Any decision made by Members of the Committee will also have to hold this in mind.

Health impact statement

35. Using data to guide the designation of cumulative impact areas is important to reduce alcohol related harm and support safer and healthier environments for residents. Areas with high densities of licensed premises can be associated with increased rates of alcohol related hospital admissions, ambulance callouts, crime and antisocial behaviour. By embedding data into licensing decisions, cumulative impact areas support evidence-based decision-making and enable efforts to address harm that can disproportionately affect vulnerable communities.

Climate change implications

36. On 27 March 2019, the council declared a climate emergency and considers the implications of climate change in all of its decisions. Following Council Assembly on 14 July 2021, the council has committed to considering the climate change implications of any decisions.
37. A review of the current CIA is not intended to have a negative impact on climate change.
38. Decisions on licences must be in line with the licensing objectives; however, as physical premises require planning consent, climate change can be addressed as part of the planning process.

Resource implications

39. The review of the Cumulative Impact Areas does not have any resource issues.
40. The resource costs of managing this process may be borne within the current licensing budget

Consultation on the Cumulative Impact Assessment

41. The CIA policy assessment is intended to be undertaken with a public consultation in accordance with the provisions of the Licensing Act 2005, Section 5(3). As such, it is proposed that the consultation will take place as set out below.
42. The policy will be introduced by circular email sent to:
 - The chief officer of the police
 - The fire authority
 - Representatives of holders of premises licences, club premises certificate holders and personal licence holders
 - Representatives of businesses and residents
 - All responsible authorities specified under the Act.
43. The statutory consultees will be notified of the review and consultation of the CIA policy and how to respond. The consultation will also be advertised at the Council's offices in Tooley Street and on the Council's website. The CIA policy report will be available for comment for a four-week period from 02 February 2026 to 01 March 2026 on the Council's website.

Implementation Table

Implementation timeline	
Public consultation 4 weeks	02.02.2026 to 01.03.2026
Licensing Committee Consideration of responses to the review and to determine the status of CIAs in Southwark	TBC June 2026

SUPPLEMENTARY ADVICE FROM OTHER OFFICERS

Assistant Chief Executive - Governance and Assurance

44. The Licensing Act 2003 ("the 2003 Act") requires the Council, as the licensing authority, to prepare and publish a statement of its licensing policy every five years. Southwark's current Statement of Licensing Policy 2021-2026 was approved by Council Assembly on 30 November 2020 which included the current CIAs. After publishing a CIA the licensing authority must, within three years, consider on the continuation of the CIAs based on the assessment in **Appendix A**.

45. In determining its policy, the Council is exercising a licensing function and as such, must have regard to the Guidance issued by the Secretary of State under section 182 of the 2003 Act. It must also give appropriate weight to the views of those persons/bodies listed in section 5(3) of the Act, which it is required to consult before determining its policy.
46. Although the Guidance represents best practice, which the Council must have regard to. The Guidance is therefore binding on the licensing authorities to that extent. As long as the Guidance has been properly and carefully understood and considered, licensing authorities may depart from it if they have reason to do so. In this event, they will need to give full reasons for their decisions, which must be consistent with the objectives of the 2003 Act.
47. The Council is required to have regard to the statement of licensing policy and make decisions in accordance with it. Licensing authorities may depart from their policy if the individual circumstances of any case merit such a decision in the interests of promoting the licensing objectives. In this event it is important that full reasons are given for departing from the published statement of licensing policy.
48. Members should note that the 2003 Act imposes a duty on the Council, as the licensing authority, to carry out its functions under the Act with a view to promoting the four licensing objectives, namely:
 - the prevention of crime and disorder
 - the promotion of public safety
 - the prevention of public nuisance
 - the protection of children from harm.
49. Each of these objectives is of paramount and equal importance. There are no other licensing objectives, and therefore the Council cannot reject an application for a licence or impose conditions on a licence for any purpose unrelated to the promotion of these objectives. For example, whether or not there is a 'need' for another licensed premises in a given area is a matter for planning committees, but is not a matter for a licensing authority in its statement of licensing policy or in discharging its licensing functions.
50. However, the cumulative impact of licensed premises on the promotion of the licensing objectives is a matter for the Council to consider when reviewing or adopting its statement of licensing policy. The Guidance explains 'cumulative impact' as the potential impact on the promotion of the licensing objectives – for example, crime and disorder and/or public nuisance - of a significant number of licensed premises concentrated in one area.
51. Positive equalities obligations are placed on local authorities, sometimes described as equalities duties, with regard to race, disability and gender. Race equality duties were introduced by the Race Relations Amendment Act 2000, which amended the Race Relations Act 1976. Gender equalities

duties were introduced by the Equality Act 2006, which amended the Sex Discrimination Act 1975. Disability equality duties were introduced by the Disability Discrimination Act 2005, which amended the Disability Act 1995.

52. Under the Local Authorities (Functions and Responsibilities) (England) Regulations 2000, as amended, decisions relating to licensing matters cannot be the responsibility of an authority's executive. The 2003 Act provides that whilst the majority of the functions of the licensing authority, are to be taken or carried out by its licensing committee, decisions relating to the statement of licensing policy cannot be delegated in such a way. The decision on whether to adopt the statement of licensing policy must therefore be taken by council assembly.

Strategic Director of Resources

53. This report is requesting the licensing committee to consider the recommendations set out in paragraph 1 above. The Strategic Director Resources notes the recommendations and that there are no identified additional resource implications as a result of these proposals, and notes that staffing and any other running costs connected with these recommendations are to be contained within existing departmental revenue budgets.

BACKGROUND DOCUMENTS

Background Papers	Held At	Contact
The Licensing Act 2003 plus secondary regulations	The Licensing Service, 3 rd Floor 160 Tooley Street, London, SE1	Mrs Esther Jones Email: esther.jones1@southwark.gov.uk
The Home Office Guidance to the Act, published as amended Feb 2025.		
Cumulative Impact Areas review December 2023		

APPENDICES

No.	Title
Appendix A	Cumulative Impact Area Assessment Policy Report – December 2025
Appendix B	Names of Streets within the current CIA and the Elephant and Castle Monitoring Area
Appendix C	Equalities Impact Needs Assessment

AUDIT TRAIL

Lead Officer	Aled Richards, Strategic Director of Environment, Sustainability and Leisure		
Report Author	Bina Patel, Business Unit Manager Neighbourhood Nuisance		
Version	Final		
Dated	13 November 2025		
Key Decision?	Yes		
CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / CABINET MEMBER			
Officer Title		Comments Sought	Comments Included
Assistant Chief Executive – Governance and Assurance		Yes	Yes
Strategic Director of Resources		Yes	Yes
Cabinet Member		No	No
Date final report sent to Constitutional Team			10 December 2025



CUMULATIVE IMPACT AREA POLICY ASSESSMENT REPORT

Regulatory Services

DECEMBER 2025

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Executive Summary

As required under the Licensing Act 2003 officers undertook a comprehensive review of alcohol-related activity across Southwark, evaluating its impact on residents, businesses, and public safety. This review included a detailed analysis of relevant data to assess whether specific areas met the criteria for designation as Cumulative Impact Areas (CIAs).

CIAs are designated where the concentration of licensed premises is likely to undermine the licensing objectives—preventing crime and disorder, ensuring public safety, preventing public nuisance, and protecting children from harm. The policy places a presumption against new or varied licences in these areas unless applicants can demonstrate no adverse impact.

The assessment examined how clusters of licensed premises affect the borough's licensing objectives. It analysed trends and identified hotspots for alcohol-related crime, disorder, and nuisance, providing robust evidence to shape Southwark's Statement of Licensing Policy. Crucially, the review aimed to strike a balance—supporting the continued growth of the hospitality sector while safeguarding residents and maintaining public safety.

The 2025 assessment built on insights from previous assessments and drew on a wide range of data sources. These included Metropolitan Police Service crime statistics, London Ambulance Service (LAS) alcohol-related callouts, and reports of anti-social behaviour (ASB). For the first time in Southwark, local authority complaints—particularly those linked to licensed premises—were analysed alongside licence applications and approvals. This comprehensive approach ensured a robust evidence base to inform our approach.

Spatial and temporal techniques were applied to identify high-density areas, crime hotspots, and peak times for incidents

The assessment reveals several significant trends. Licensing density is notably high, with nearly half of all licensed premises concentrated within the existing CIA¹ and monitoring zones², which together cover only 16% of the borough. CIAs exhibit a striking density of 197.4 premises per km² compared to just 33.6 premises per km² elsewhere.

Business composition underscores the dominance of alcohol-related venues, as drinking establishments and off-sales account for over 42% of all outlets. While applications and approvals have declined since 2020/21, CIAs remain a focal point, representing nearly 40% of all applications.

Complaints are similarly concentrated, with 65% originating from CIAs and monitoring areas, and Borough & Bankside consistently recording the highest levels. Alcohol-related crime is most

¹ Existing CIA areas – Borough and Bankside, Peckham and Elephant and Castle

² Existing monitoring areas – Elephant and Castle

prevalent in Borough & Bankside and Elephant & Castle, the latter showing the highest incident rate at 334.64 per km².

Finally, temporal patterns indicate that most incidents occur late at night and on weekends, highlighting the need for targeted enforcement during these periods.

The risk assessment highlights clear area rankings. Elephant & Castle emerges as the highest-risk location across all metrics—crime, complaints, anti-social behaviour, and ambulance callouts—requiring priority intervention. Borough & Bankside also presents elevated risk, with high premises and crime density, necessitating continued targeted measures.

In contrast, Peckham and Camberwell demonstrate notable improvements and now exhibit lower risk profiles. Old Kent Road and Walworth show mixed results, with certain indicators suggesting that lighter-touch interventions may be appropriate.

Recommendations

The evidence strongly supports a targeted approach to licensing policy. Borough & Bankside should be retained as a CIA due to its persistently high premises and crime density, while Elephant & Castle warrants designation as a new CIA given its escalating risk profile and concentration of alcohol-related harm.

Conversely, Peckham and Camberwell should be removed from CIA status, as current data no longer justifies their inclusion.

All monitoring areas should be discontinued since there is no evidence of ongoing risk.

This proportionate, evidence-led strategy ensures Southwark's licensing framework remains focused, adaptive, and responsive to local conditions, safeguarding public safety while supporting a vibrant night-time economy.

Introduction

Southwark is a borough with a unique mix of residential neighbourhoods, cultural attractions, and major transport hubs. Its excellent transport connectivity makes it a magnet for visitors and businesses, creating a thriving night-time economy. This success brings benefits but also challenges. Dense clusters of licensed venues around key destinations have led to increased issues such as alcohol-related crime, public safety concerns, and noise complaints, placing significant regulatory demands on the council.

Areas like London Bridge and Elephant and Castle illustrate these challenges clearly. Its extensive transport links generate heavy late-night foot traffic, which in turn drives higher rates of alcohol-related incidents and disorder. Traditional licensing controls alone could not manage these risks effectively, highlighting the need for targeted measures in high-risk zones.

Recognising this, Southwark introduced CIAs between 2008 and 2011 as part of its licensing policy framework. Camberwell was designated in 2008, followed by Peckham in 2009 and Borough & Bankside in 2011. These areas were identified because of their high concentration of licensed premises and associated public health and safety concerns. In addition, three monitoring areas—Elephant & Castle, Walworth, and Old Kent Road—were established to track emerging trends in alcohol-related disorder.

This strategic approach reflects Southwark's commitment to balancing a vibrant night-time economy with the need to protect residents, visitors, and businesses from the negative impacts of over-concentration.

Legislative context

The concept of Cumulative Impact has been embedded in Secretary of State's Guidance issued under section 182, since the introduction of the Licensing Act 2003. It forms part of the council's adopted licensing policy and is a key consideration for the authority when discharging its functions and developing that policy

Where an area has been designated as a CIA, the Council must have regard to the concentration of licensed premises in an area may affect the four licensing objectives: preventing crime and disorder, ensuring public safety, preventing public nuisance, and protecting children from harm. For example, a dense cluster of such venues might increase risks related to crime or public disturbance.

CIAs remain a critical tool for managing cumulative impact, but adaptive measures and targeted interventions are essential to address evolving risks. The implementation and assessment of a CIA policy must be based on data specific and associated to alcohol-related crime, including ASB and Ambulance callouts. This provides transparency and evidence-based justification for cumulative impact policies, ensuring that decision-making for applications considers the broader effect of clustering licensed premises.

A CIA policy sits under the overarching Licensing policy. The publication of a CIA does not change how licensing decisions are made; the Licensing Authority will always consider each application on its merits. However, a CIA is a strong statement of intent about an authority's approach to licence applications.

The CIA policy places a presumption that any new or variation applications within the defined areas would likely add to the existing cumulative impact and therefore be refused. The policy allows applicants to rebut the refusal presumption if they can demonstrate that the premises operation would not adversely impact the intention of the policy and add to the existing cumulative impact.

Data Sets Used in the 2025 Assessment

The 2025 assessment of alcohol-related activity in Southwark was informed by a targeted selection of datasets³, chosen for their relevance to public safety, health, and licensing impacts. These included:

- Local crime and disorder statistics, with a focus on specific crime types and identified hotspots.
- Anti-social behaviour offence data, reflecting community-level disturbances.
- Health-related indicators, such as alcohol-related emergency department attendances and hospital admissions.

However, changes in data collection systems—particularly within police and ambulance services—had a material impact on the comparability and completeness of the data:

- Direct comparisons with the December 2023 assessment are not recommended, as the datasets differ significantly in structure and coverage.
- Metropolitan Police Service (MPS) data was incomplete, notably lacking alcohol-related crime figures for the 2023/2024 financial year. As a result, percentage change analysis for this category between 2023/2024 and 2024/2025 could not be undertaken.

To strengthen the robustness of the assessment and align with best practices observed in other London boroughs, additional datasets⁴ were incorporated:

- Volume of complaints received by the Local Authority, particularly those submitted by residents and residents' associations concerning licensed premises.
- Density of licensed premises, including categorisation by outlet type.
- Licence applications submitted to the Local Authority providing insight into market activity and demand.

Further detail on these datasets and the analytical parameters applied is provided in the Methodology section of this report

³ Data source : Divisional Analytical and Business Service

⁴ Data Source : APP Civica

Methodology

The Cumulative Impact Assessment (CIA) has been developed through systematic data analysis to provide a comprehensive understanding of cumulative impacts within these areas.

The 2025 assessment is informed by a defined set of datasets⁵, including local crime and disorder statistics, and health indicators such as alcohol-related emergency attendances and hospital admissions. The assessment has built on previous data analysis to ensure continuity, integrity, and robustness in both the methodology and the resulting recommendations.

Changes in police systems and ambulance call-out logging procedures affected data consistency, making direct comparison with the December 2023 assessment inadvisable. Furthermore, data provided by the Metropolitan Police Service relating to alcohol-related crime records for 2023/2024 is now categorised differently, preventing direct comparisons.

To provide a more comprehensive understanding of Southwark's licensing landscape, the assessment incorporated additional datasets following a review of methodologies adopted by other boroughs. These included complaints recorded by the Council concerning licensed premises, alongside the density of licensed premises and outlet types, and licence applications received. Full details of these datasets and the assessment parameters are outlined in the methodology section.

Datasets discussed below.

We continued to use the following datasets and note their limitations.

Data Cohort	Alcohol Related Crime	Limitations
<u>MPS crime data</u>	Two crime alcohol data cohorts were used. The first cohort was all violent crime reports with a drink-related feature code⁶. The second cohort identified a bespoke violent crime dataset. This was introduced in 2018/19, and it removed incidents of domestic abuse, road rage and safeguarding offences from this dataset.	Between 2022 and 2023, the Metropolitan Police Service adopted a new incident recording and reporting platform known as CONNECT. This transition resulted in modifications to the categorisation, storage, and extraction of incident data, including changes to field structures, classification codes, and unique identifiers. As recognised by London Datastore (2024), crime and incident statistics should not be directly compared with figures from 2023 onwards We have used the dataset to provide us with indicative insights.

⁵ Data source: Divisional Analytical and Business Service

⁶ MPS CRIS Drink related feature codes – GA – Alcohol consumed at scene by suspect/accused, MF – suspect/accused had been drinking prior to committing offence, MV – victim had been drinking prior to offence.

Data Cohort	Alcohol Related Crime	Limitations
Ambulance call-out data AS callouts data	Alcohol related incidents	The London Ambulance Service (LAS) implemented significant digital introducing an electronic Patient Care Record (ePCR) system from 2020, and planning a new Computer-Aided Dispatch (CAD) system rollout from 2022. These changes enhanced the precision and consistency of data capture but altered the way incident types, priorities, and responses are coded and recorded. As a result, ambulance call-out data from 2021–2023 may not be directly comparable with datasets from 2023–2025 due to differences in recording methods and data structure. ⁷
ASB calls to the police	categorised as rowdy behaviour or street drinking with an alcohol flag are included in the dataset.	The LA Analyst dataset (available via Box for the period 2022/23) is an unpublished data source provided by the Metropolitan Police and does not represent official police figures. Consequently, some variation may occur when comparing outputs derived from this dataset with those from other official systems. ⁸
British Transport Police and Transport for London	Crime data was not included in the analysis	These data sets do not record specific location details of offences committed on the transport network.

Introduction of additional data - Licensing data: To ensure a thorough evidence-based assessment was undertaken, in addition to the crime and ambulance data, the 2025 review introduces new datasets which capture complaints made to the Council about licensed premises. These additions provide a more comprehensive understanding of the impact from licensed premises in local areas. To ensure robustness of the data and gain meaningful insights, the data includes the financial years from 2020/21 to 2024/25.

The data has been used as follows.

- Density of Licence premises and outlet categories
- Volume of complaints recorded by the Local Authority, which include complaints raised by residents or residents' associations, particularly in relation to licensed premises.
- Licence applications received by the local authority.

⁷ (London Ambulance Service, 2023).

⁸ Southwark Community Safety Partnership, Strategic Assessment 2024/25.

Licence data was grouped by financial year (April to the following March) starting from 2021/2022 to 2024/2025. The business type was aggregated into five mutually exclusive categories:

- Bars, public-houses, hotel bars and nightclubs were grouped and are collectively referred to as *drinking establishments*.
- Restaurants and cafes were aggregated together and are collectively referred to as *eateries*.
- Licensed takeaway food restaurants were kept separate and are referred to as *takeaways*.
- Off-licences, grocery stores and supermarkets are grouped into one *off-sales* category.
- Those alcohol-outlets that do not fit into any of the above categories are collectively referred to as *other outlets* (such as florists, boats, community halls or schools).

Statistical methods - Exploratory Spatial Data Analysis (ESDA) techniques were applied, including spatial overlay analysis, proportional mapping, and descriptive spatial statistics, to identify patterns in premises distribution and density across Southwark. These methods enabled the grouping of licensed premises within predefined locations and the calculation of standardised density rates (premises per square kilometre). This approach supports meaningful comparisons across areas of varying size and highlights high-density areas for cumulative impact policy decisions.

The assessment also employed the below Exploratory Data Analysis (EDA) methods:

- Frequency distribution and percentage share analysis for business type composition and alcohol involvement in crime.
- Time-series and linear trend lines to track licensing trends and complaints data.
- Comparative bar charts, Horizontal funnel charts for proportional breakdown for crime category analysis and ratio analysis across CIAs and monitoring areas.
- Cross-tabulation by premises type and location to identify problematic categories.
- Heatmaps and Temporal heatmaps and time-segmented frequency analysis for crime density and hotspot mapping and to reveal peak hours and evening crime patterns.

Evaluation Framework

The evaluation framework assesses the data based on methodologies used by other London boroughs⁹. The assessment considers the density of licensed premises within each area, as high concentrations are often linked to increased risks of crime and public nuisance.

Crime density is analysed using police data to identify hotspots of alcohol-related incidents, while complaint volume from residents and businesses provides insight into persistent community concerns. Temporal patterns are examined to determine peak times for incidents, such as late-night and weekend periods, enabling targeted enforcement.

⁹ London Boroughs of Hounslow, Ealing, Merton, Hackney, Westminster and Wandsworth.

Finally, trend analysis is conducted across multiple years to assess whether issues are increasing, decreasing, or stable, ensuring that policy recommendations are responsive to changing local conditions.

The recommendation of the CIA designation in this assessment is based on five evaluation criteria:

Criterion	Description	Typical CIA Threshold
Premises Density	High concentration of licensed premises	> Borough's average
Crime Density	Persistent alcohol-related crime	> Borough's average
Complaint Volume	Disproportionate number of public complaints	Above borough average
Temporal Patterns	Concentration of incidents during late-night/weekend hours	00:00–03:00 activity
Trend Analysis	Sustained or increasing pressures over time	Year-on-year increase

Table 1 The Recommendation Criteria

Data sources include licensing applications, police and ambulance records, and complaint data. Thresholds were benchmarked against borough averages and trends over the past three years.

Risk Ranking Summary: Each area was scored (1 = highest risk, 6 = lowest) across five metrics: Premises density, Crime density, Complaint density, ASB and LAS callout.

Licensing activity in Southwark

As of mid-2022, the London Borough of Southwark had a population of 311,913 (ONS), spread across 29 square kilometres (11 square miles). Southwark currently has 1618 licensed premises¹⁰.

Although the CIA and monitoring areas represent only 4.76 km², or 16% of the borough's total area, they account for nearly 50% of licensing activity. This concentration means that about half of all licensed premises are located within a small geographic area, creating high licensing density and increased regulatory demand.

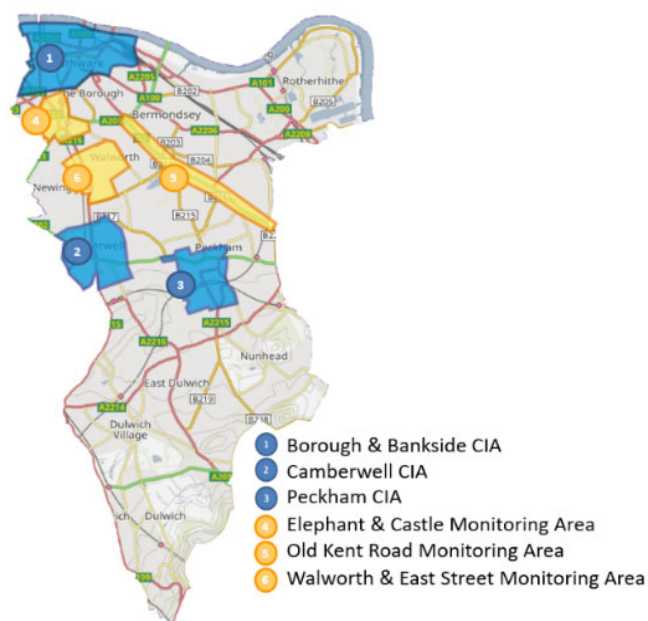


Figure 1 Map of Southwark showing CIAs and Monitoring areas

Premises Density Across Southwark.

Southwark has a total of 1,618 licensed premises spread across roughly 29 square kilometres, giving the borough an overall licensing density of 55.79 premises per km².

Area	No. of Premises	Area (km ²)	Density (Premises/km ²)
CIA	612	3.1	197.4
Monitoring Areas	192	1.66	115.7
Other Areas within Southwark	814	24.24	33.6
Total for Southwark	1618	29	55.79

Table 2 Density of Licensed Premises across Southwark

The Cumulative Impact Areas (CIAs) account for 3.1 km², while Monitoring Areas cover a further 1.66 km². Together, these designated zones represent just 16% of Southwark's total area, with the remaining 24.24 km² comprising Other Areas not currently subject to specific licensing designations.

¹⁰ Data Source: App Civica

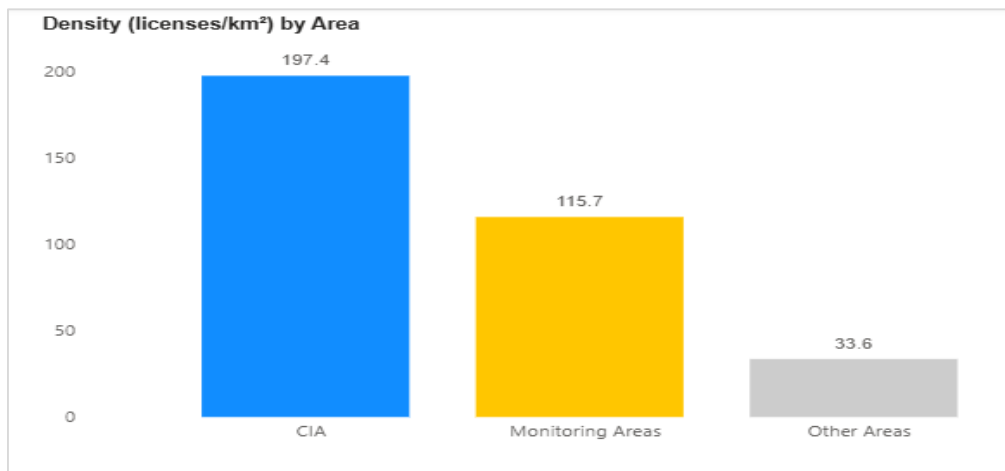


Figure 2 Density of Licence Premises in Southwark

The analysis of premises density shows that Cumulative Impact Areas (CIAs) have the highest concentration of licensed premises, averaging 197.4 premises per km² (56.94%), compared to 115.7 premises per km² (33.37%) in monitoring areas and just 33.6 premises per km² (9.69%) in other parts of the borough. This means CIAs are nearly six times denser than non-designated areas.

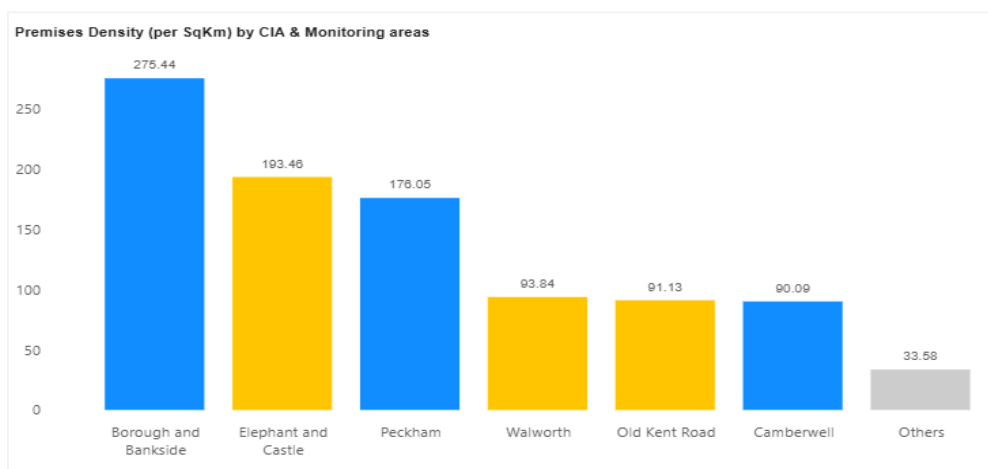


Figure 3 premises density per square kilometre - CIA and Monitoring areas 2024/2025

Within individual locations, Borough & Bankside leads with 275.44 premises per km² (29.94%), followed by Peckham (176.05, 19.14%) and Camberwell (90.09, 9.79%). Among monitoring areas, Elephant & Castle stands out with a density of 193.46 premises per km² (21.03%), comparable to CIAs. In contrast, Walworth (93.84) and Old Kent Road (91.13) remain moderate-density zones when compared to other areas within the borough.

Premises Distribution - CIAs and Monitoring areas

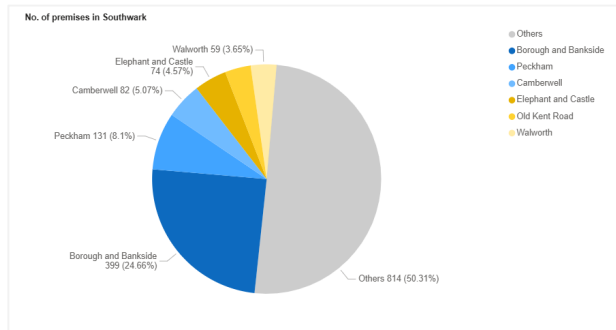


Figure 4 Number of premises in Southwark 2024/2025

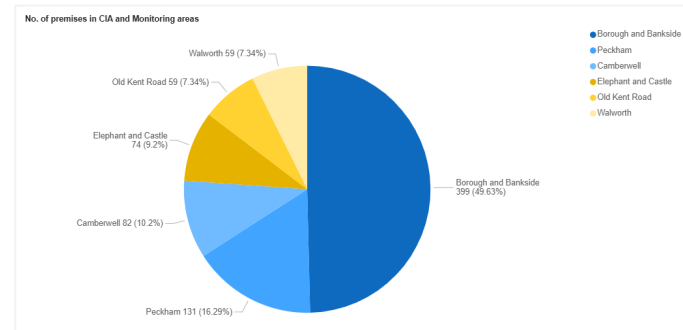


Figure 5 Distribution of Licence premises in CIA and monitoring areas

An analysis of licensed premises within Southwark reveals a significant concentration in the borough's designated CIAs: Borough & Bankside, Peckham, and Camberwell. These CIAs account for the majority of Licensing activity and are therefore central to regulatory planning. Collectively, the CIAs account for 76.12% of all premises within both CIA and monitoring areas, underscoring their strategic significance in Licensing oversight.

Key Insights

- Borough & Bankside is the most densely populated licensing area, accounting for nearly half of all premises in the CIA and monitoring areas.
- Peckham and Camberwell follow, with 16.3% and 10.2% respectively.
- Monitoring areas: Elephant & Castle, Walworth, and Old Kent Road make up the remaining 23.88%.

Business Types Composition.

A total of 1,618 licensed premises were recorded across the borough. To assess the cumulative impact, licensed premises were grouped into four main business-type cohorts based on their primary operational characteristics. These categories are:

- **Eateries:** This category includes premises where the primary activity is the consumption of food on-site. Examples include restaurants, cafés, and bistros. Alcohol may be served, but it is ancillary to the dining experience.
- **Off-Sale:** These are premises where alcohol is sold for consumption off the premises. This includes grocery stores, convenience shops, and dedicated off-licences. The sale of alcohol is typically part of a broader retail offering.
- **Drinking Establishments:** This group includes bars, pubs, and similar venues where the primary activity is the consumption of alcohol on the premises. Food may be available, but it is secondary to the drinking experience.
- **Takeaways:** Premises in this category offer food for consumption off-site, such as fast-food outlets and takeaway restaurants. Alcohol sales, if present, are typically limited and ancillary.

- **Others / Mixed Use:** To simplify the categorisation of premises that do not fit neatly into the above groups, a fifth category was used. This includes mixed-use establishments such as hotels, educational institutions, theatres, and community centres, where alcohol may be served but is not the primary focus.

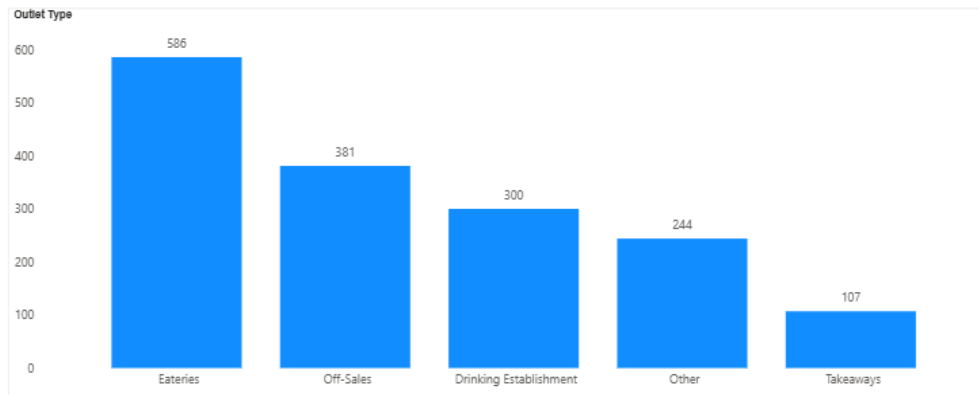


Figure 6 Business type composition in Southwark

The outlet composition is led by Eateries, which account for 36.22% (586) of all licensed premises. This is followed by Off-Sales at 23.55% (381) and Drinking Establishments at 18.54% (300). Other outlet types represent 15.08% (244), while Takeaways make up 6.61% (107).

Notably, Drinking Establishments and Off-Sales combined represent over 42% of all outlets, highlighting a significant concentration of alcohol-related premises. This is particularly relevant to the assessment, as these outlet types are commonly associated with elevated risks of alcohol-related crime, anti-social behaviour, and public safety concerns.

Although Takeaways are fewer in number, they are often linked to late-night activity, congregation, and environmental nuisance, which can contribute to low-level disorder in specific areas. Of the total licences issued within the borough, the following chart demonstrates the distribution of licensed premises within the CIA and monitoring areas.

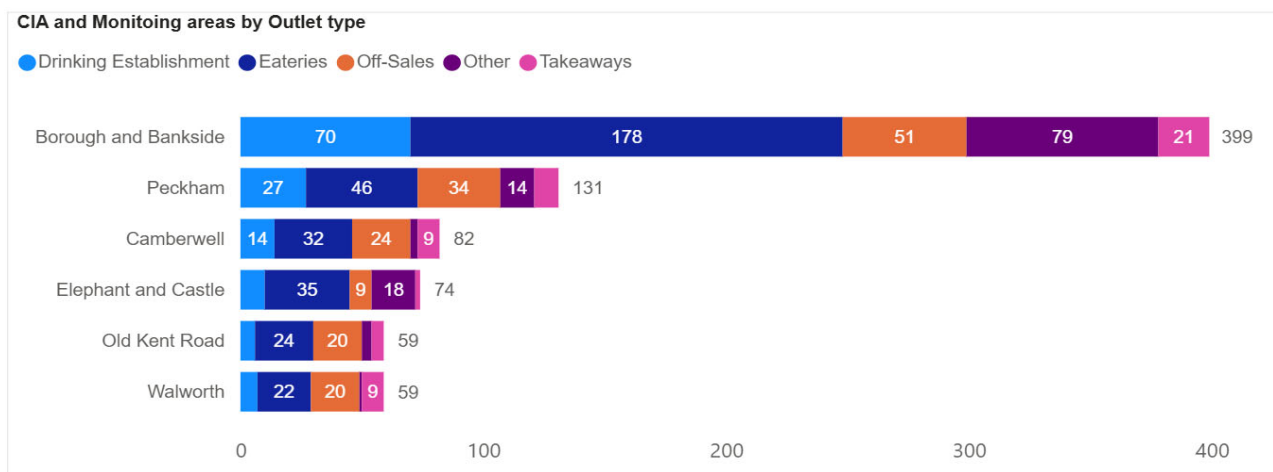


Figure 7 Business type composition across the CIA and Monitoring areas

- **Borough and Bankside:** This area presents the highest outlet density, with 399 licensed premises, including 70 drinking establishments, 51 off-sales, and 178 eateries. Additionally, there are 79 other outlets and 21 takeaways. The volume and diversity of

alcohol-related outlets (drinking establishments and off-sales) indicate a heightened risk of crime and disorder, particularly during evening hours.

- Peckham: A total of 131 outlets were recorded, comprising 27 drinking establishments, 34 off-sales, 46 eateries, 14 other outlets, and 10 takeaways. While the area is not saturated, the presence of alcohol-related outlets is notable.
- Camberwell: This area shows a different pattern, with 82 outlets, including 14 drinking establishments, 32 eateries, 24 off-sales, 3 other outlets, and 9 takeaways. Alcohol-related outlets are fewer compared to Borough & Bankside and Peckham, but may contribute to late-night activity and nuisance.
- Elephant & Castle: There are 74 outlets, including 10 drinking establishments, 35 eateries, 9 off-sales, 18 other outlets, and 2 takeaways. Although drink-focused outlets are less prevalent, the distribution of establishments closely mirrors that of Camberwell in terms of food-oriented outlets.
- Old Kent Road: This area has 59 outlets, with 6 drinking establishments, 24 eateries, 20 off-sales, 4 other outlets, and 5 takeaways. While overall density is lower, the proportion of alcohol-related premises remains notable.
- Walworth: Also with 59 outlets, Walworth includes 7 drinking establishments, 22 eateries, 20 off-sales, 1 other outlet, and 9 takeaways. The composition of outlets is almost similar to Old Kent Road.

Licensing Trends (FY2020/21 to FY2024/25)

This section highlights both the broader Licensing environment and the more specialised trends within CIAs, offering insight into application demand and specific patterns across the period. It reviews annual trends in licensing activity within the CIA and monitoring areas, emphasising the total number of applications received, and licences granted over the financial years from 2020/21 to 2024/25

The chart below illustrates the relationship between the total applications received and granted across Southwark.

Applications received vs granted

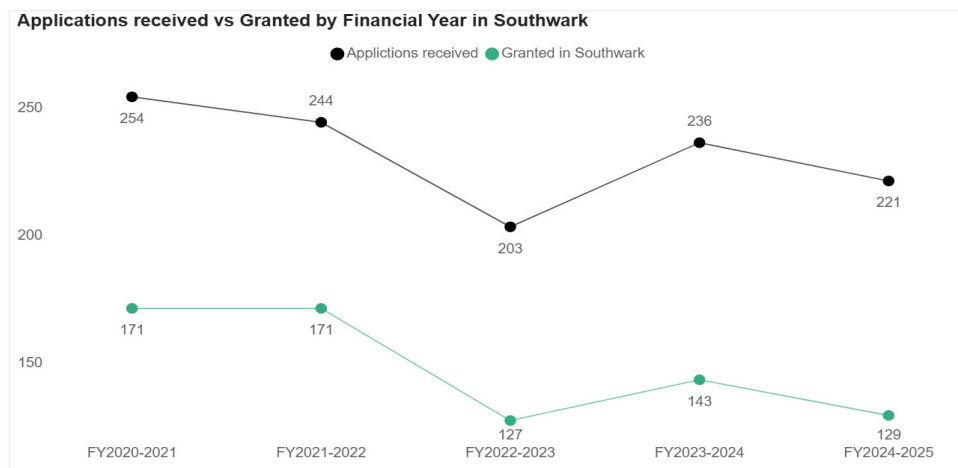


Figure 8 Applications received and granted.

The chart above shows a consistent decline in licensing activity over five years. Applications received fell from 254 in FY2020-2021 to 221 in FY2024-2025 (a 13% decrease), while licences granted dropped more sharply from 171 to 129 (a 24% reduction). The most significant dip occurred in FY2022-2023, with only 203 applications and 127 approvals. Although there was a partial recovery in FY2023-2024, figures declined again in FY2024-2025. The approval rate also fell steadily from 67% to 58%, indicating that fewer applications were successful.

Applications received in Southwark categorised by areas

The chart below highlights area-level trends in licensing applications.

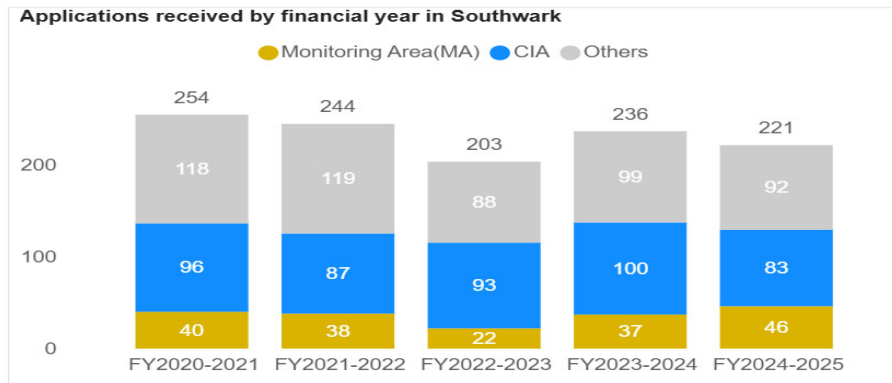


Figure 9 Applications received from 2020/2021 to 2024/2025

While “Others” areas of the borough consistently account for the largest share, their numbers declined from 118 in FY2020-2021 to 92 in FY2024-2025. Cumulative Impact Areas (CIAs), which cover only 3.1 km² of the borough, received 39.64% of all applications, underscoring their significance despite limited size.

CIAs peaked at 100 applications in FY2023-2024 before dropping to 83 in FY2024-2025, showing fluctuations in demand. Monitoring Areas remain the smallest contributor, ranging from 40 to 46 applications, with a sharp dip to 22 in FY2022-2023.

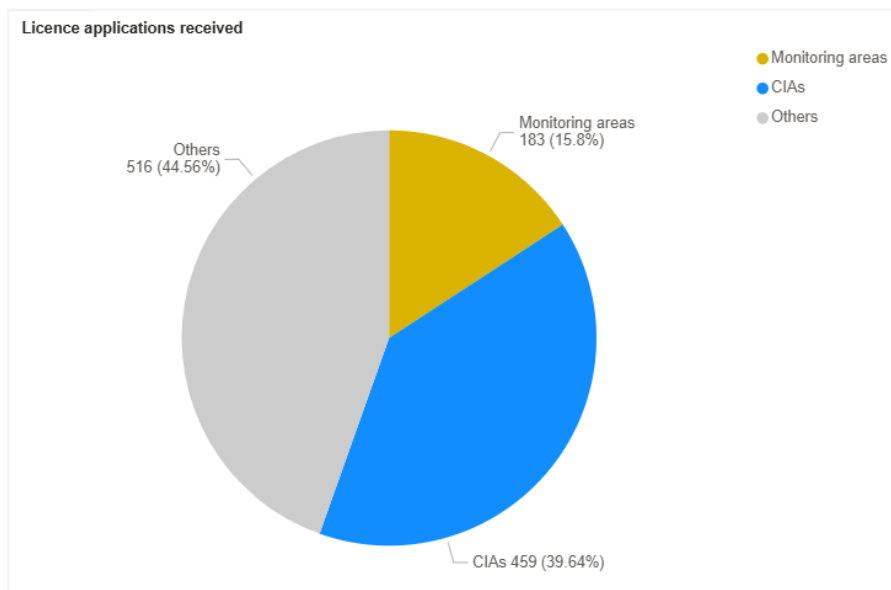


Figure 10 Proportion of Applications received in Southwark

The analysis of Licence Applications Received over a five-year period reveals that 459 applications (39.64%) originated from CIAs, 516 applications (44.56%) were classified as Others, and 183 applications (15.8%) came from Monitoring Areas.

This indicates that nearly half of all applications originated from the “Others” category, while CIAs account for a substantial share, almost matching the combined total of other borough areas. Monitoring Areas contributed the smallest proportion, reinforcing their limited but consistent role in licensing activity.

Applications granted in Southwark by area

The Applications granted by area show the distribution of licences across Southwark and how they have changed over time. The pattern broadly mirrors applications received, but with sharper declines. Other areas of the borough remain dominant, although approvals fell from 85 in FY2020-2021 to 54 in FY2024-2025, reflecting the overall downward trend.

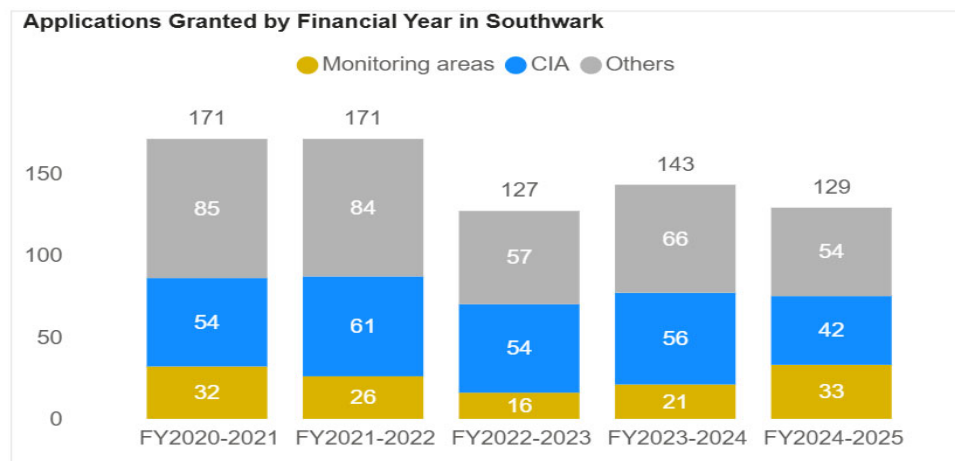


Figure 11 Applications granted by area

CIAs, despite covering only 3.1 km² of the borough, consistently account for a substantial share of approvals. They peaked at 61 licences granted in FY2021-2022, then dropped to 42 in FY2024-2025.

Monitoring Areas, which represent a smaller footprint than CIAs, show resilience. Approvals improved from a low of 16 in FY2022-2023 to 33 in FY2024-2025, suggesting proportionally higher success rates compared to other categories despite their limited application volumes. This trend highlights that Monitoring Areas, while small in size and activity, may benefit from more favourable licensing outcomes.

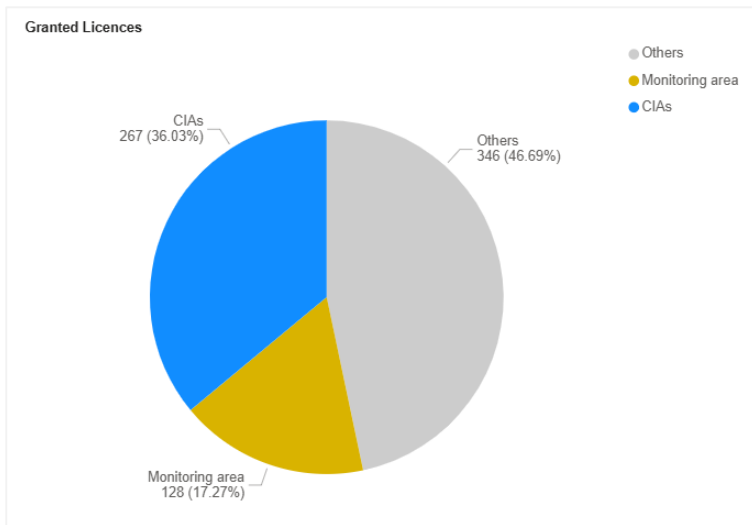


Figure 12 Proportion of Applications granted in Southwark

The cumulative distribution of granted licences over a five-year period shows that 346 licences (46.69%) were classified as Others, 267 licences (36.03%) were granted to CIAs, and 128 licences (17.27%) were associated with Monitoring Areas.

When comparing these proportions to the physical size of each category within the doughnut chart, “Others” areas, which cover the largest area of the borough, yet their share of approvals (46.69%) is only slightly higher than CIAs (36.03%), which occupy a fraction of the borough’s size. This comparison suggests that CIAs, despite their limited geographic footprint, remain a high-intensity zone for licensing activity and approvals, while Monitoring Areas demonstrate efficiency in converting applications into licences.

Key insight (Applications received and granted).

- Applications received fell from 254 in FY2020-2021 to 221 in FY2024-2025 (a 13% decrease), while licences granted dropped more sharply from 171 to 129 (a 24% reduction). Approval rates declined from 67% to 58%, indicating fewer successful applications despite reduced demand.
- CIAs account for 39.64% of all applications and 36.03% of approvals.

Distribution of Issued Licences in CIAs

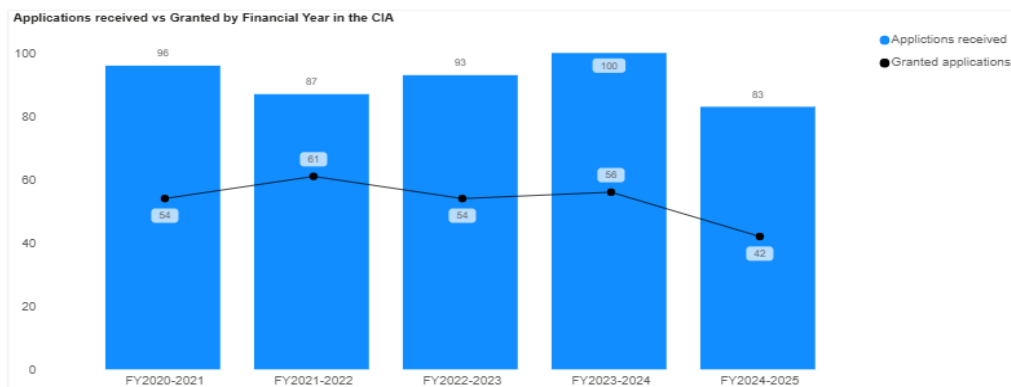


Figure 13 Applications received and granted/issued - CIAs

Across FY2020-2021 to FY2024-2025, applications received in CIAs remained consistently high, ranging from 83 to 100, with a peak in FY2023-2024. Granted applications, however, show a downward trend, declining from 54 in FY2020-2021 to 42 in FY2024-2025 and approval rates have fluctuated between 42% and 61%.

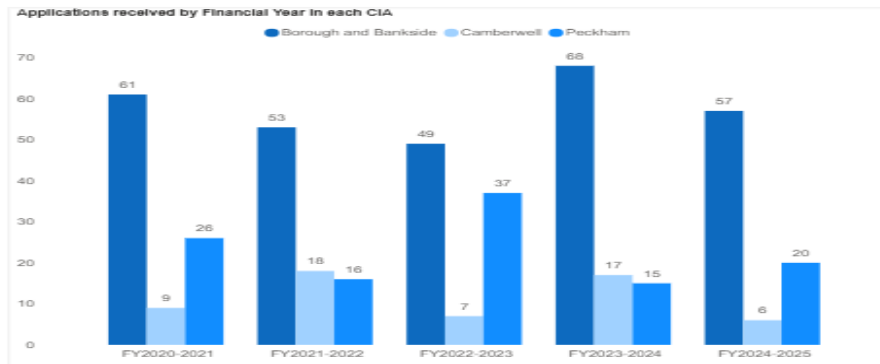


Figure 14 Applications received by financial year in each CIA

Across all financial years, Borough and Bankside consistently accounts for the highest volume of applications, establishing it as the dominant contributor. Application volumes for this area ranged from 49 to 68 annually, peaking in FY2023-2024 with 68 submissions. In contrast, Camberwell recorded persistently low figures, fluctuating between 6 and 18 applications, while Peckham demonstrated a notable spike to 37 applications in FY2022-2023 before stabilising at lower levels.

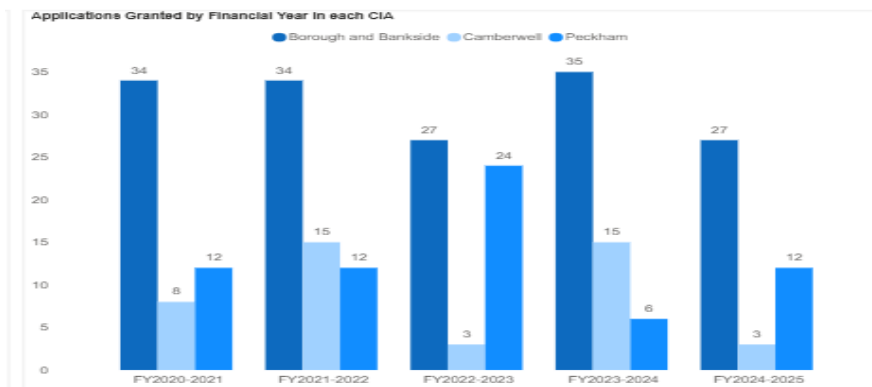


Figure 15 Applications granted by financial year in each CIA

Approval trends mirror the application pattern but with narrower gaps between areas. Borough and Bankside, granting between 27 and 35 applications annually. Peckham showed significant variability, achieving its highest approval count of 24 in FY2022-2023 and 15 in FY2023-2024 (15 approvals from 15 applications). Camberwell, despite an early peak of 15 approvals in FY2021-2022, declined sharply thereafter, granting only 3 of 6 applications in subsequent years.

Key insights

- Borough and Bankside remain the dominant contributors in both applications and approvals. Approval rates have been relatively stable but show a gradual decline, ranging from 55.74% (34 approvals out of 61 applications in FY2020-2021) to 47.37% (27 approvals out of 57 applications in FY2024-2025).

- Peckham demonstrates significant fluctuation, with approval rates fluctuating from 46.15% (12/26 in FY2020-2021) to a peak of 100% (15/15 in FY2023-2024).
- Camberwell shows the highest variability, starting at 88.89% (8 approvals out of 9 applications in FY2020-2021), dropping sharply to 35.29% (6 approvals out of 17 applications in FY2023-2024), and recovering slightly to 50% (3 approvals out of 6 applications in FY2024-2025).

Distribution of Issued Licences in Monitoring areas

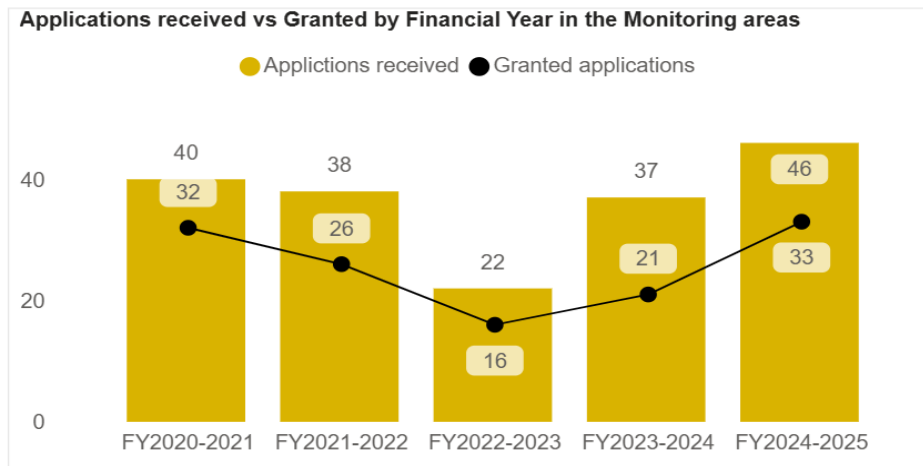


Figure 16 Total applications received and granted by financial year in Monitoring areas

From FY2020-2021 to FY2024-2025, applications received in monitoring areas fluctuated significantly, ranging from 22 in FY2022-2023 to 46 in FY2024-2025. Granted applications followed a similar trajectory, with approval rates varying between 80% in FY2020-2021 to 71% in FY2024-2025.

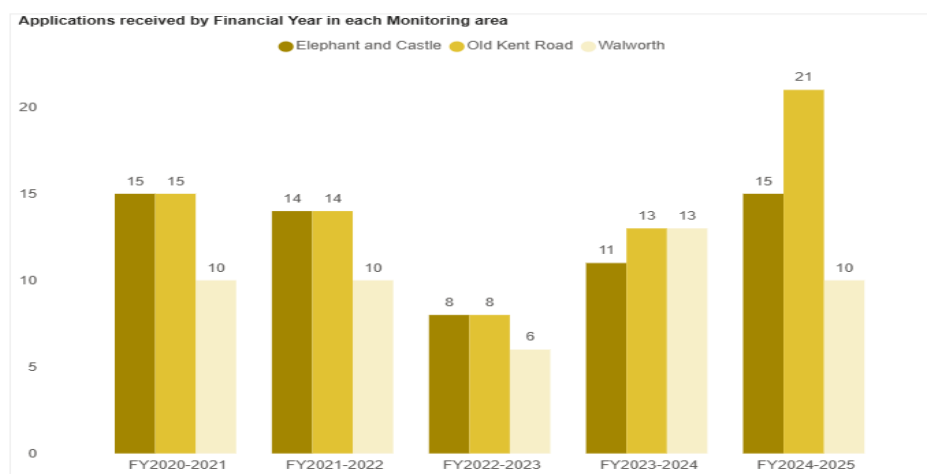


Figure 17 Applications received by financial year in each Monitoring area

Applications across the three monitoring areas show fluctuating trends over five financial years. Elephant and Castle and Old Kent Road began strongly in FY2020-2021 with 15 applications each, while Walworth remained lower at 10. All areas experienced a significant decline in FY2022-2023, followed by a recovery in FY2023-2024. The most notable change occurred in FY2024-2025,

where Old Kent Road surged to 21 applications—the highest recorded—while Elephant and Castle went up again to 15 and Walworth stayed constant at 10.

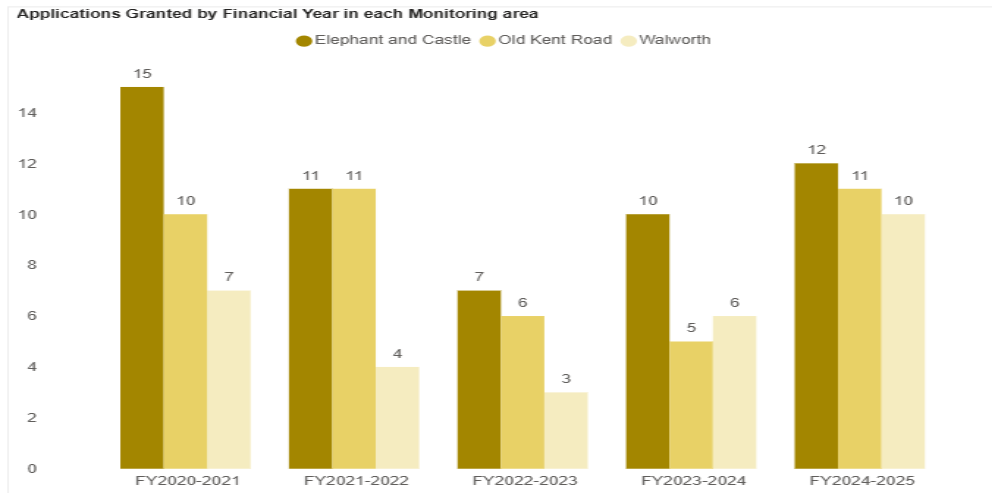


Figure 18 Applications granted by financial year in each Monitoring areas

Applications granted across the three monitoring areas show a similar fluctuating pattern to applications received. Elephant and Castle consistently leads, starting at 15 in FY2020-2021, dipping to 7 in FY2022-2023, and rising to 12 in FY2024-2025. Old Kent Road follows closely, beginning at 10, dropping to 6 in FY2022-2023, and rising to 11 in FY2024-2025. Walworth remains the lowest throughout, starting at 7, falling to 3 in FY2022-2023, and rising to 10 by FY2024-2025. Overall, while all areas experienced a sharp decline in FY2022-2023.

Key insights

- Elephant and Castle has maintained consistently high approval rates over recent years, beginning with 100% in FY2020–2021 (15 approvals from 15 applications). Rates then ranged between 78.6% in FY2021–2022 (11 of 14 applications) and 90.9% in FY2023–2024 (10 of 11 applications), ending at 80% in FY2024–2025 (12 of 15 applications).
- Old Kent Road shows moderate fluctuations in approval rates, rising from 66.7% in FY2020–2021 (10 approvals from 15 applications) to 78.6% in FY2021–2022 (11 of 14 applications), before falling to 46.2% in FY2023–2024 (6 of 13 applications) and then increasing slightly to 52.4% in FY2024–2025 (11 of 21 applications).
- Walworth exhibits the greatest variation in approval rates, starting at 70% in FY2020–2021 (7 approvals from 10 applications), falling to 38.5% in FY2023–2024 (5 of 13 applications), and then rising sharply to 100% in FY2024–2025 (10 of 10 applications).

Complaint Trends in Southwark

This section analyses the volume and distribution of complaints submitted to the Noise and Licensing services concerning licenced premises covering the period from FY2020/21 to FY2024/25.

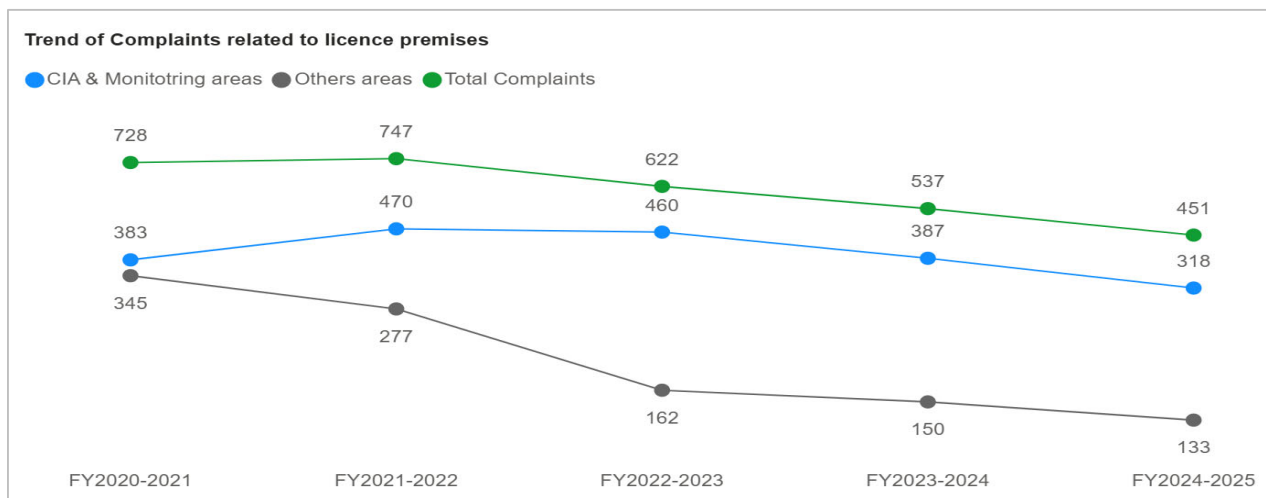


Figure 19 Summary of complaints from 2020/2021 to 2024/2025

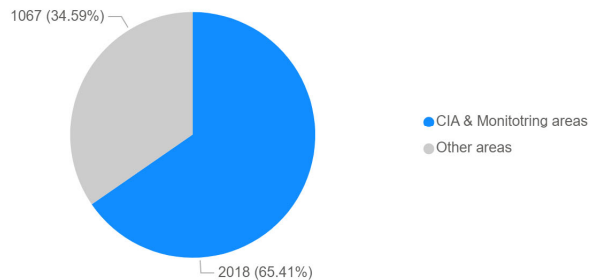
The findings highlight the disproportionate concentration of complaints within CIAs and designated monitoring areas, as well as persistent hotspot areas.

Key Insights

- On average, CIAs and monitoring areas account for 65.41% of all complaints related to licensed premises across Southwark between 2020/2021 to 2024/2025. Notably, other areas of the borough experienced a steeper decline compared to the CIA and monitoring areas, from 345 to 133 complaints, marking a 61% reduction.
- Borough & Bankside remained the most affected area throughout the reporting period. Borough & Bankside, Peckham, and Walworth consistently recorded higher complaint volumes.
- Total complaints decreased from 728 in FY2020/2021 to 451 in FY2024/2025, representing a 38% reduction.
- The peak year for complaints was FY2021/2022, with a total of 747 complaints, of which 62.91% originated from CIA and Monitoring Areas.
- Overall Decline: Complaints are decreasing, particularly in other parts of the borough.

Complaints related to Licenced Premises in Southwark

Complaints relating to License Premises in Southwark



Complaints related to Licence Premises by area

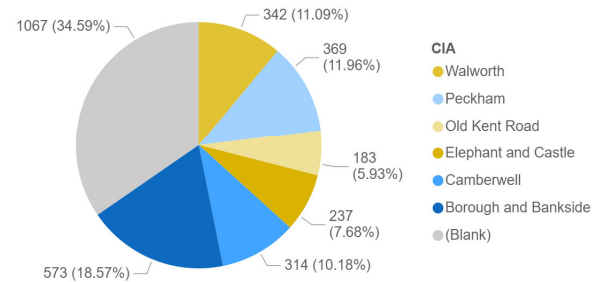


Figure 20 Breakdown of complaints relating to Licensed premises in Southwark from 2020/2021 to 2024/2025

The Breakdown of Complaints data¹¹ related to licensed premises shows that the CIAs and monitoring areas account for 65.41% of all complaints (2,018 cases), while the remainder of the borough (other areas) contributes 34.59% (1,067 cases). This indicates that the majority of issues linked to licensed premises are concentrated in designated high-density zones

The Complaints related to Licensed Premises data breaks down complaints by location within the CIAs and monitoring areas. Borough & Bankside records the highest share at 18.57% (573 complaints), followed by Peckham (11.96%, 369) and Walworth (11.09%, 342). Camberwell accounts for 10.18% (314), while Elephant & Castle and Old Kent Road contribute 7.68% (237) and 5.93% (183) respectively.

These figures highlight Borough & Bankside as the most problematic area, with Peckham and Walworth also showing significant complaint volumes. In contrast, Old Kent Road remains relatively low risk compared to the other areas.

¹¹ Data source: APP Civica

Alcohol Associated Incidents in Southwark.

This section analyses crime data in Southwark using four datasets:

- Three datasets from Local MPS crime data covering the financial year 2024/2025
- One dataset from the London Ambulance Service (LAS) alcohol-related call-out data covering 2023/2024 to 2024/2025

Datasets Included

- Alcohol-Flagged Violence: This dataset includes all violent crime reports where:
 - Alcohol was consumed at the scene by the suspect/accused
 - The suspect/accused had been drinking prior to the offence
 - The victim had been drinking prior to the offence
- Alcohol Related Violent Crime: A bespoke violent crime dataset introduced in 2018/19, excluding incidents of domestic abuse, road rage, and safeguarding offences.
- London Ambulance Service (LAS) Alcohol Callouts: Covers incidents where LAS responded to alcohol-related emergencies during the specified period.
- Anti-Social Behaviour (ASB) Calls: Includes ASB calls to the police categorised as rowdy behaviour or street drinking, flagged as alcohol related.

Previous Assessment Reference

A previous assessment covering the financial years between 2021 to 2023¹² is included for context only and is not used to draw conclusions. These tables serve as indicative data and should not be interpreted as trend analysis between the 2023 assessment and the 2025 assessment. The reasons for this limitation are outlined in the Methodology section on page 8.

Data Summary

A total of 3,485 alcohol associated incidents¹³ were recorded in 2024/2025 across the borough, with 983(28.21%) incidents within CIA zones and 588 (16.87%) incidents occurring in Monitoring Areas.

Incident Type	Total in Southwark	CIA's	Monitoring Areas	Other areas in Southwark
Alcohol Related Violent Crime	937	225(24.01%)	197 (21.02%)	515(54.96%)
Alcohol Related Crime	1,645	458(27.84%)	342 (20.79%)	845(51.36%)
Alcohol related rowdy behaviour and street drinking	445	183(40.21%)	69 (15.16%)	193(43.37%)
LAS Calls out	1,455	312(21.44%)	197(13.53%)	946(65.01%)

Table 3 Alcohol Related reports as a percentage of the borough's total

¹² Cumulative Impact Areas Alcohol Licensing Review, December 2023 by Divisional Analytical and Business Service

¹³ Total of Alcohol flagged violence, Alcohol related rowdy behaviour and street drink and LAS Calls out

Key Insights:

- CIAs account for a significant share of incidents, particularly rowdy behaviour and street drinking, where they represent 40.21% of all borough-wide reports.
- Alcohol-related violence is the largest category overall and shows notable concentration in CIAs (28.26%) and Monitoring Areas (20.94%).
- Monitoring Areas contribute consistently across categories, with the highest share in alcohol-related violence (20.94%).
- Alcohol-related ambulance callouts remain substantial, with CIAs responsible for 21.44% of these incidents.

The table below shows the percentage change of CIAs and Monitoring areas from FY2021/2022 – FY2024/2025. The table below shows the breakdown of the total reports by the four datasets for FY2021/2023 and FY2023/2025. Each table shows what was previously reported in the 2023 assessment on top and the current assessment below all covering CIAs and the monitoring areas.

Assessment undertaken in 2023		Total report FY21/22		Total reported FY 22/23		% change in the no. of incidents between 21/22 to 22/23
		No. of incidents in the area	% of incidents in the borough	No. of incidents in the area	% of incidents in the borough	
CIA Area	Alcohol related rowdy behaviour and street drink	122	30.20%	114	35.50%	-6.60%
	LAS Calls out	740	44.50%	661	44.10%	-10.70%
	Alcohol Related Crime	85	29.10%	77	32.20%	-9.40%
	Alcohol Related Violent Crime	548	24.50%	564	29.20%	2.90%
Monitoring Areas	Alcohol related rowdy behaviour and street drink	58	16.3%	48	15.0%	-17.2%
	LAS Calls out	428	25.7%	368	24.5%	-14%
	Alcohol Related Crime	43	17.1%	36	15.1%	-16.3%
	Alcohol Related Violent Crime	282	14.1%	304	15.8%	7.8%

Assessment undertaken in 2025		Total report FY23/24		Total reported FY 24/25		% change in the no. of incidents between 23/24 to 24/25
		No. of incidents in the area	% of incidents in the borough	No. of incidents in the area	% of incidents in the borough	
CIA Area	Alcohol related rowdy behaviour and street drink	193	75.39%	183	40.21%	-5.18%
	LAS Calls out	397	65.61%	312	21.44%	-21.41%
	Alcohol Related Crime	-	-	458	27.84%	-
	Alcohol Related Violent Crime	-	-	225	24.01%	-
Monitoring Areas	Alcohol related rowdy behaviour and street drink	63	24%	69	15.16%	9.52%
	LAS Calls out	208	34.38%	197	13.53%	-5.28%
	Alcohol Related Crime	-	-	342	20.79%	-
	Alcohol Related Violent Crime	-	-	197	21.02%	-

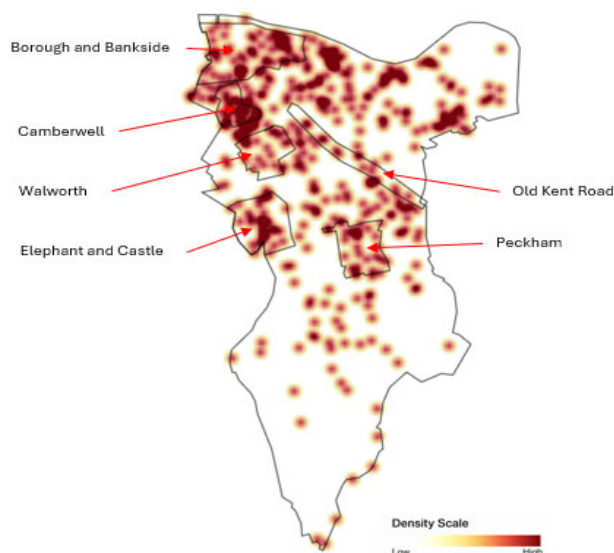
Table 4 Alcohol related reports by area and year as a percentage of the borough's total

The table above shows the proportion each area represents of the borough total and a volume comparison from 2023/2024 to 2024/2025. CIA areas in FY2023/2024 recorded a modest decline in alcohol-related rowdy behaviour (5.2%) and LAS call-outs (21.4%). In contrast, monitoring areas experienced a 9.5% rise in rowdy behaviour and a slight reduction in LAS call-outs (5.3%), indicating mixed outcomes.

It is important to note that alcohol-related crime and violent crime datasets lack data for FY2023/2024, which limits direct year-on-year comparison. These gaps should be considered when interpreting trends; see the Limitations section on page 8 for further details.

Alcohol Related Rowdy Behaviour & Street Drink

The heatmap illustrates the distribution of incidents across the borough, with density ranging from low (light yellow) to high (dark red). The highest concentration of activity is observed in Borough and Bankside, which shows multiple dark red clusters, indicating significant incident density. Camberwell and Peckham also exhibit strong hotspots. Elephant and Castle show moderate density compared to borough and bankside and Camberwell, while Walworth and Old Kent Road display relatively sparse clusters, indicating lower levels of incidents.



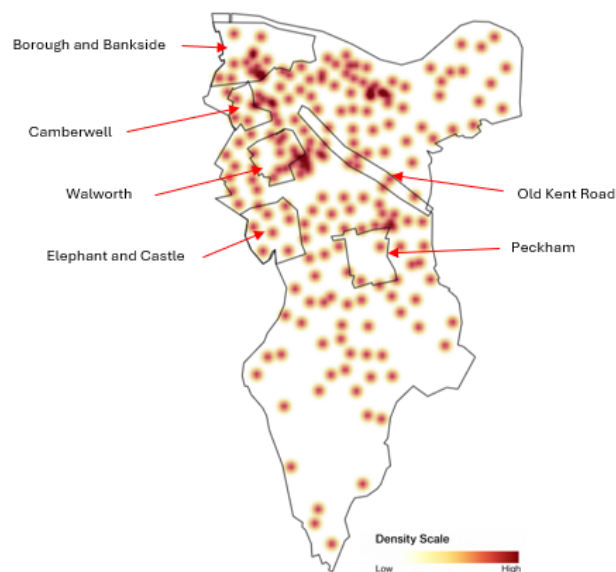
Alcohol Related Rowdy Behaviour & Street Drink	Assessment undertaken in 2023	Total report FY21/22		Total reported FY 22/23		% change in the no. of incidents between 21/22 to 22/23
		No. of incidents in the area	% of incidents in the borough	No. of incidents in the area	% of incidents in the borough	
	Borough and Bankside	71	17.6%	57	17.8%	-19.7%
	Camberwell	27	6.7%	21	6.5%	-22.2%
	Peckham	24	5.9%	36	11.2%	50%
	Elephant and Castle	19	4.7%	55	4.7%	-21%
	Old Kent Road	20	5.0%	82	5.3%	-15%
	Walworth	27	6.7%	46	5.0%	-40.7%
	Assessment undertaken in 2025	Total report FY23/24		Total reported FY 24/25		% change in the no. of incidents between 23/24 to 24/25
		No. of incidents in the area	% of incidents in the borough	No. of incidents in the area	% of incidents in the borough	
	Borough and Bankside	79	4.7%	55	12.08%	-30.37%
	Camberwell	70	5.0%	82	18.02%	14.28%
	Peckham	44	6.7%	46	10.10%	4.54%
	Elephant and Castle	28	6.50%	36	7.91%	28.57%
	Old Kent Road	13	3.02%	11	2.42%	-15.38%
	Walworth	22	5.10%	22	4.84%	0

Table 5 Alcohol related rowdy behaviour and street drinking by area and year as a percentage of the borough's total

The assessment data for FY2023/2024 and FY2024/2025 show mixed trends across the six areas. Borough and Bankside experienced the largest decline, dropping by 30.37% from 79 to 15 reports, despite a higher percentage share in FY2024/2025. Camberwell and Elephant and Castle recorded notable increases of 14.28% and 28.57% respectively, indicating strong growth. Peckham saw a modest rise of 4.54%, while Old Kent Road declined by 15.38%. Walworth remained unchanged at 22 reports, showing no growth. Overall, the data highlights significant shifts, with Elephant and Castle emerging as the strongest performer and Borough and Bankside showing the most substantial reduction.

LAS Calls out

The heatmap illustrates the distribution of incidents across the borough, with density ranging from low (light yellow) to high (dark red). It indicates that Borough and Bankside remain the most prominent hotspot, with dense clusters of incidents concentrated in the northern part of the borough. Camberwell and Peckham also show significant concentrations, marking them as secondary areas of concern. Elephant and Castle exhibit moderate density compared to the CIAs, while Walworth and Old Kent Road display relatively sparse clusters, suggesting lower levels of incidents.



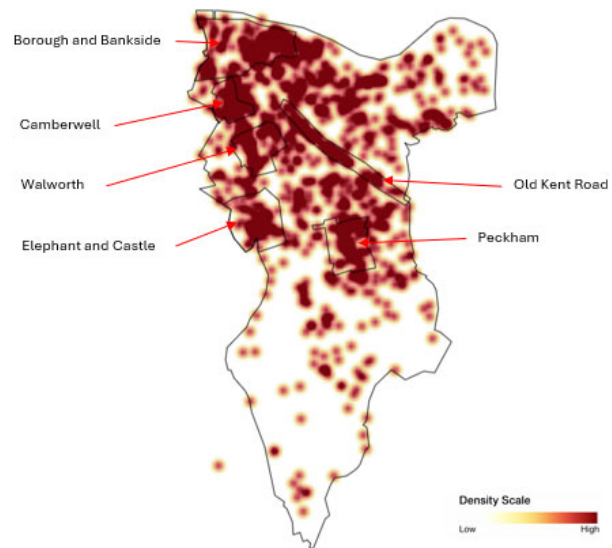
LAS Calls Out	Assessment undertaken in 2023	Total report FY21/22		Total reported FY 22/23		% change in the no. of incidents between 21/22 to 22/23
		No. of incidents in the area	% of incidents in borough	No. of incidents in the area	% of incidents in borough	
	Borough and Bankside	468	28.1%	404	27.0%	-13.7%
	Camberwell	126	7.6%	116	7.7%	-7.9%
	Peckham	146	8.8%	141	9.4%	-3.4%
	Elephant and Castle	197	11.8%	161	10.7%	-18.3%
	Old Kent Road	127	7.6%	134	8.9%	5.5%
	Walworth	104	6.3%	73	4.9%	29.8%
	Assessment undertaken in 2025	Total report FY23/24		Total reported FY 24/25		% change in the no. of incidents between 23/24 to 24/25
		No. of incidents in the area	% of incidents in borough	No. of incidents in the area	% of incidents in borough	
	Borough and Bankside	215	13.79%	176	12.10%	-18.13%
	Camberwell	124	7.95%	82	5.64%	-33.87%
	Peckham	58	3.72%	54	3.71%	-6.89%
	Elephant and Castle	77	4.94%	67	4.60%	-12.98%
	Old Kent Road	46	2.95%	43	2.96%	-6.52%
	Walworth	85	5.45%	87	5.98%	2.35%

Table 6 LAS callout by area and year as a percentage of the borough's total

The comparison between FY2023/24 and FY2024/25 shows an overall decline in reported assessments across most areas. Borough and Bankside recorded the largest volume of incidents in both years but saw a significant decrease of 18.13%, dropping from 215 to 176 reports. Camberwell experienced the sharpest decline at 33.87%, falling from 124 to 82 reports. Peckham and Old Kent Road also decreased by 6.89% and 6.52% respectively, while Elephant and Castle dropped by 12.98%. Walworth was the only area to show an increase, with a 2.35% increase from 85 to 87 reports. Despite reductions, Borough and Bankside continues to hold the largest share.

Alcohol Related Crime

The heatmap highlights Borough and Bankside as the most concentrated hotspot, with dense clusters of incidents in the northern part of the borough. Camberwell and Peckham also show strong concentrations, indicating secondary areas of concern. Elephant and Castle exhibit moderate density, while Walworth and Old Kent Road remain relatively low-density zones. Overall, the northern and central areas continue to experience the highest incident density.



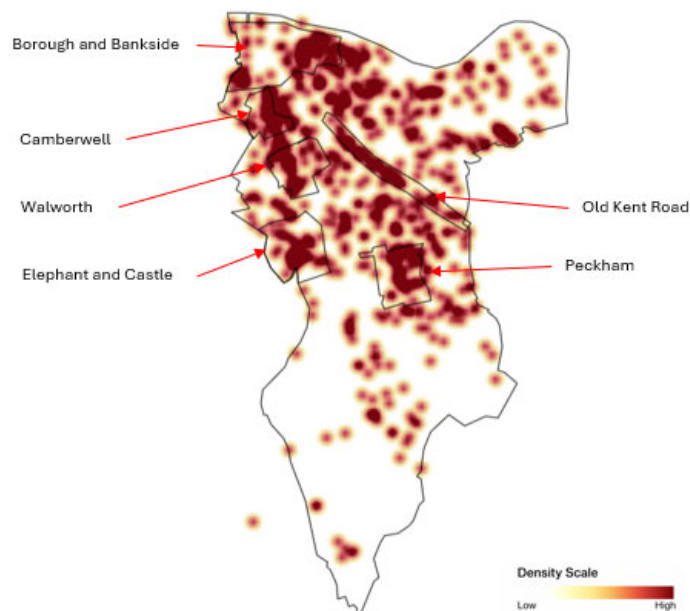
Alcohol Related Crime	Assessment undertaken in 2023	Total report FY21/22		Total reported FY 22/23		% change in the no. of incidents between 21/22 to 22/23
		No. of incidents in the area	% of incidents in borough	No. of incidents in the area	% of incidents in borough	
	Borough and Bankside	51	17.5%	43	18.0%	-15.7%
	Camberwell	23	7.9%	20	8.4%	-13%
	Peckham	11	3.8%	14	5.9%	27.3%
	Elephant and Castle	20	6.8%	11	4.6%	-45%
	Old Kent Road	19	6.5%	16	6.7%	-15.8%
	Walworth	11	3.8%	9	3.8%	-18.2%
	Assessment undertaken in 2025	Total report FY23/24		Total reported FY 24/25		% change in the no. of incidents between 23/24 to 24/25
		No. of incidents in the area	% of incidents in borough	No. of incidents in the area	% of incidents in borough	
	Borough and Bankside	-	-	243	14.77%	-
	Camberwell	-	-	105	6.38%	-
	Peckham	-	-	110	6.68%	-
	Elephant and Castle	-	-	133	8.08%	-
	Old Kent Road	-	-	104	6.32%	-
	Walworth	-	-	105	6.13%	-

Table 3 Alcohol Related Crime by area and year as a percentage of the borough's total

The table shows reported assessments for FY2024/2025, with no prior year comparison available. Borough and Bankside recorded the highest number of reports at 243, accounting for 14.77% of the total. Elephant and Castle follows with 133 reports (8.08). Peckham reported 110 (6.68%), while Camberwell, Old Kent Road and Walworth reported similar figures at 105 (6.38%), 104 (6.32%) and 105 (6.38%). Overall, the data highlights Borough and Bankside as the dominant area, with Elephant and Castle also showing notable activity. Although percentage figures are provided, they do not represent year-on-year change because data for FY2023/2024 is unavailable. This limitation affects trend analysis and should be considered when interpreting results (see Data Limitations section for details Page 8).

Alcohol Related Violent Crime

The heatmap illustrates that Borough and Bankside is the most significant hotspot for violence with injury crimes, with dense clusters concentrated in the northern part of the borough. Camberwell and Peckham also show notable concentrations, indicating secondary areas of concern. Elephant and Castle exhibit moderate density compared to the CIAs, while Walworth and Old Kent Road display relatively sparse clusters, suggesting lower levels of incidents. Overall, the distribution highlights that the northern and central areas of the borough experience the highest crime density.



Alcohol Related Violent Crime	Assessment undertaken in 2023	Total report FY21/22		Total reported FY 22/23		% change in the no. of incidents between 21/22 to 22/23
		No. of incidents in the area	% of incidents in borough	No. of incidents in the area	% of incidents in borough	
	Borough and Bankside	267	11.9%	226	11.7%	-15.4%
	Camberwell	136	6.1%	166	8.6%	22.1%
	Peckham	145	6.5%	172	8.9%	18.6%
	Elephant and Castle	124	4.6%	94	4.9%	-24%
	Old Kent Road	124	5.5%	105	5.4%	-15.3%
	Walworth	88	3.9%	105	5.4%	19.3%
	Assessment undertaken in 2025	Total report FY23/24		Total reported FY 24/25		% change in the no. of incidents between 23/24 to 24/25
		No. of incidents in the area	% of incidents in borough	No. of incidents in the area	% of incidents in borough	
	Borough and Bankside	-	-	103	10.99%	-
	Camberwell	-	-	62	6.61%	-
	Peckham	-	-	60	6.40%	-
	Elephant and Castle	-	-	78	8.32%	-
	Old Kent Road	-	-	66	7.04%	-
	Walworth	-	-	53	5.65%	-

Table 8 Alcohol Related Violent Crime by area and year as a percentage of the borough's total

The above table details Alcohol related violent crimes for FY2024/2025 with a total of 422 reported incidents. Borough and Bankside recorded the highest number with 103 reports, while Walworth had the lowest at 53 reports. Other areas reported between 60 and 78 incidents, with Elephant and Castle ranking second highest. Although percentage figures are provided, they do not represent year-on-year change because data for FY2023/2024 is unavailable. This limitation affects trend analysis and should be considered when interpreting results (see Data Limitations section for details Page 8).

Crime and ASB Density

The table below highlights the rate of alcohol related crime and ASB as a rate per square kilometre in 2024/2025. Recognising that the geographical size of the six areas varies, an incident rate per square kilometre has been used to provide a fairer comparison. This is calculated as the number of incidents divided by the size of the area.

Wards	Area by Sq Km	Alcohol related crime (Incident rate per sq km)	ASB (Incident rate per sq km)
Borough and Bankside	1.45	167.58	37.93
Camberwell	0.91	115.38	90.10
Peckham	0.74	148.64	62.16
Elephant and Castle	0.38	350	94.73
Old Kent Road	0.65	160	16.92
Walworth	0.63	166.66	34.92
Other areas in Southwark	24.24	34.85	8.37

Table 9 Density of Alcohol related crimes

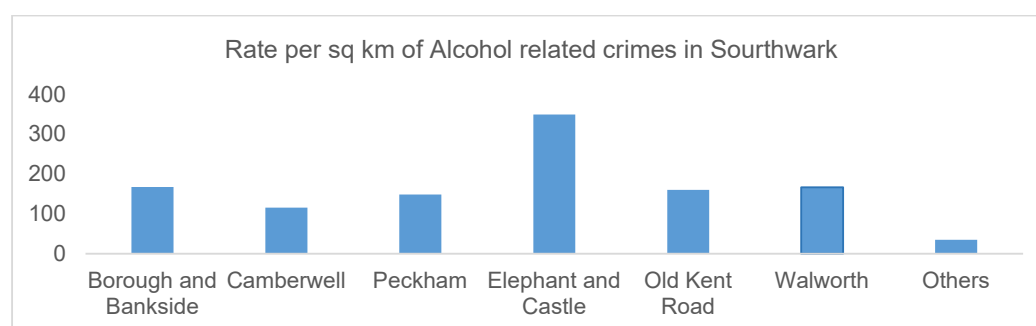


Figure 21 Density of Alcohol related crimes

Elephant and Castle stand out with the highest incident density at 334.64 incidents per sq. km, more than double the rate observed in most other areas. Despite its small geographic size (0.38 sq. km). Borough and Bankside (164.99), Old Kent Road (159.10), and Walworth (160.65) show moderately high densities compared to the others. Peckham (141.11) also ranks relatively high, while Camberwell has the lowest density at 114.26 incidents per sq. km, despite recording a comparable total volume of incidents.

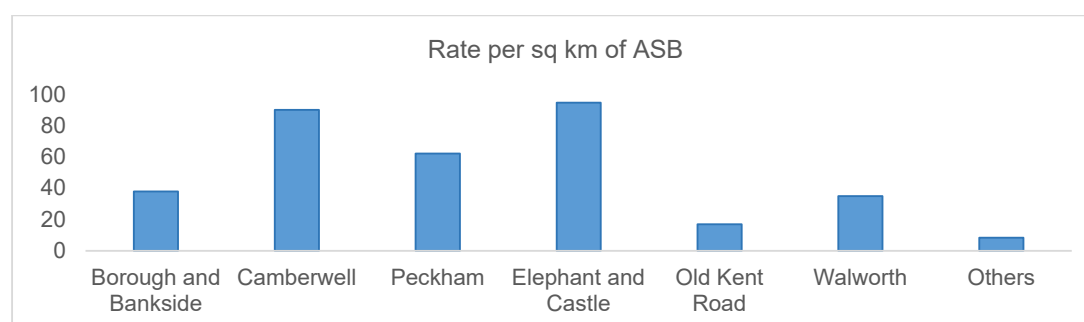


Figure 22 Density of Density per square kilometre - ASB

Elephant & Castle and Camberwell show the highest densities (around 90 incidents per sq. km), indicating concentrated ASB activity. Peckham follows with a moderate rate (~60), while Borough & Bankside and Walworth are much lower (~35–40). Old Kent Road and Others record minimal ASB rates (<20).

Analysis of Crime Categories.

The Horizontal Funnel chart below displays the overall distribution of crime categories for the financial years from 2020/2021 to 2024/2025. Each horizontal bar represents a crime type, with its width proportional to the number of recorded incidents. The chart starts with the most frequent crime at the top and narrows down to the least frequent at the bottom.

The data shows that Violence Against the Person overwhelmingly dominates, with 415 incidents (100%), making it the most significant crime category. Theft (104 incidents) and Public Order Offences (77 incidents) follow as major contributors, while Sexual Offences (68 incidents) and Arson & Criminal Damage (45 incidents) represent mid-level risks.

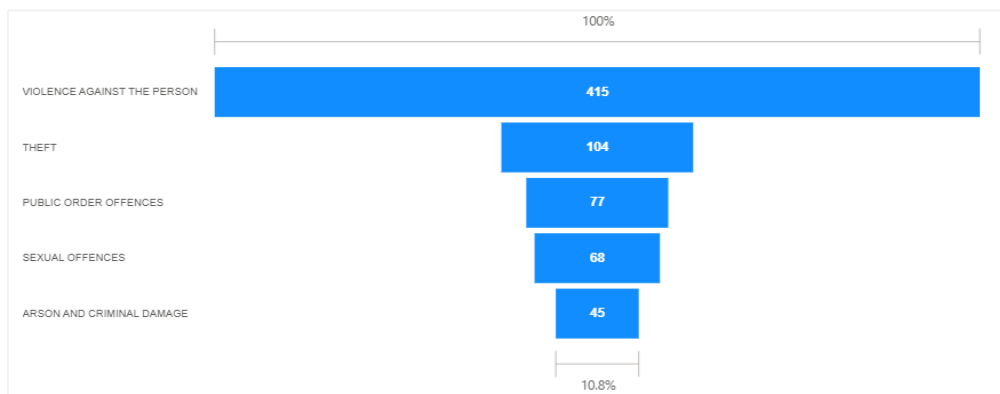


Figure 23 Alcohol related across various crime categories in CIA and the Monitoring areas

The bar chart below provides a breakdown of reported incidents which are alcohol related across various crime categories in the CIAs and the monitoring areas.

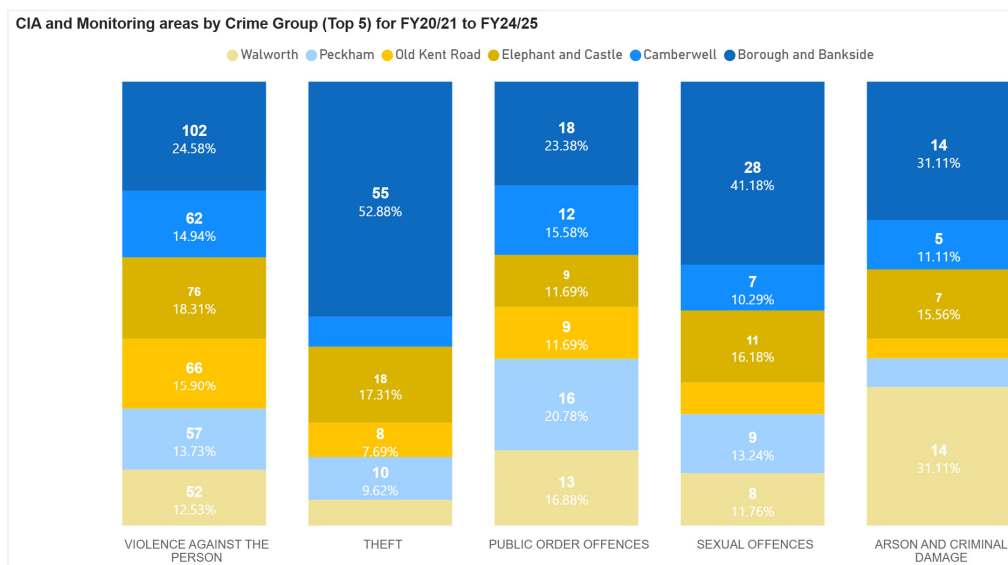


Figure 24 Alcohol related crimes with location details

Violence Against the Person is the most prevalent category, with Borough and Bankside reporting the highest number (102 incidents), followed by Elephant and Castle (76) and Old Kent Road (66).

Theft and Public Order Offences also show high volumes, particularly in Borough and Bankside and Elephant and Castle, indicating hotspots for antisocial behaviour and property-related crimes. Sexual Offences, while lower in volume, are distributed across all areas, with Elephant and Castle and Borough and Bankside again showing higher counts.

Overall, Borough and Bankside consistently record the highest incident volumes across most categories.

Elephant and Castle also emerges as a high-activity area, particularly for violent and public order offences.

Crime Distribution Analysis between 18:00–21:00

This Horizontal Funnel chart illustrates the distribution of crime categories recorded between 18:00 and 21:00 for the financial years from 2020/2021 to 2024/2025. Each horizontal bar represents a crime type, with its width proportional to the number of incidents. The chart begins with the most frequent category at the top and narrows down to the least frequent at the bottom, creating a funnel effect.

The data shows that Violence Against the Person dominates evening crime, accounting for 35 incidents (100%). Sexual Offences (12 incidents) and Public Order Offences (9 incidents) follow as major categories, while Theft (8 incidents) and Arson & Criminal Damage (5 incidents) represent mid-level risks.

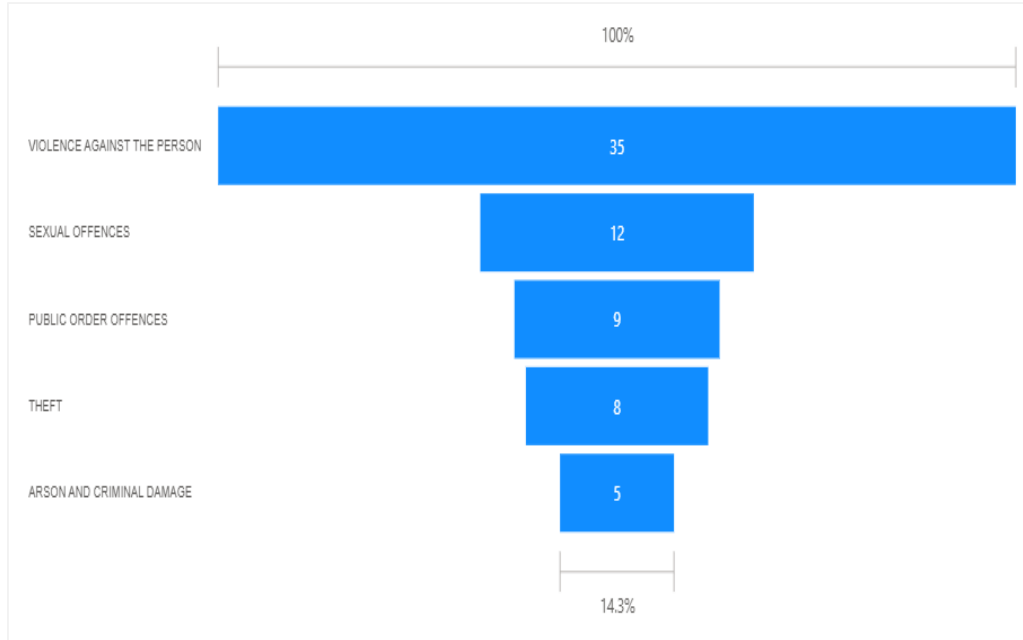


Figure 25 Crime Distribution between 18:00 and 21:00 in CIA and Monitoring Areas

The bar chart provides a snapshot of crime patterns during early evening hours across the CIAs and the monitoring areas. The data highlights Violence Against the Person as the most prevalent crime group, with 73 incidents spread across all areas, indicating a borough-wide concern during this time window.

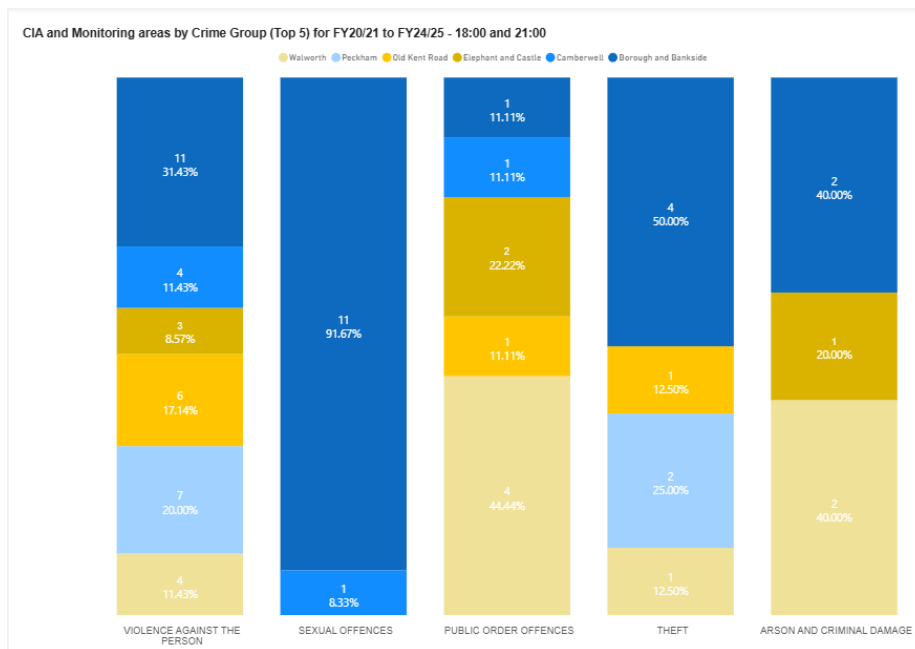


Figure 26 Crime Distribution between 18:00 and 21:00 in the CIA and Monitoring Areas with details

The analysis of evening crime patterns across CIAs and monitoring areas reveals significant spatial and categorical disparities between the years 2020/2021 to 2024/2025.

Borough & Bankside emerges as the dominant hotspot during evening hours compared to the other areas. It accounts for 91.67% of sexual offences (11 incidents), 31.43% of violence against the person (11 incidents), and 40% of arson and criminal damage (2 incidents).

Camberwell records 20% of violent incidents (7) while Walworth records the highest share of public order offences (44.44%, 4 incidents). Walworth and Old Kent Road contribute 12.5% each to theft.

Peckham, Borough and Bankside, and Old Kent Road show minimal evening crime, with only isolated incidents such as 11.11% of public order offences.

CIA Temporal Grids - Alcohol Linked Reports

The analysis of incident timing across the CIAs and monitoring areas reveals clear peaks associated with the late-night economy. – check with police for sensitive data before use.

Hour band	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday	Sunday	Grand Total
00:00-00:59								67
01:00-01:59								87
02:00-02:59								66
03:00-03:59								52
04:00-04:59								54
05:00-05:59								28
06:00-06:59								20
07:00-07:59								15
08:00-08:59								19
09:00-09:59								16
10:00-10:59								12
11:00-11:59								15
12:00-12:59								16
13:00-13:59								8
14:00-14:59								15
15:00-15:59								22
16:00-16:59								36
17:00-17:59								23
18:00-18:59								16
19:00-19:59								20
20:00-20:59								37
21:00-21:59								33
22:00-22:59								53
23:00-23:59								50
Grand Total	66	78	92	89	118	175	162	780

Table Legend

0-2	Very Low
3-6	Low
7-12	Medium
13-18	High
19-25	Very High

Figure Temporal patterns across CIAs and monitoring areas

A total of 780 incidents were recorded, with the highest concentrations occurring during the early morning hours of weekends. Saturday (175 incidents) and Sunday (162 incidents) together account for 43% of all incidents, followed by Friday (118 incidents). Weekdays show significantly lower volumes, ranging from 66 to 92 incidents per day.

Hourly patterns indicate that the critical risk window is between 00:00 and 03:59, which accounts for the majority of incidents. The single highest hour is 01:00–01:59, with 87 incidents, followed by 00:00–00:59 (67 incidents) and 02:00–02:59 (66 incidents).

After 04:00, incident levels decline sharply, dropping below 30 per hour. Secondary peaks occur during the late evening, particularly between 21:00 and 23:59, with 37 incidents recorded at 21:00–21:59.

These patterns strongly suggest that there are concentrated activities from Friday to Sunday nights, particularly between midnight and 4 AM.

Recommendations

Cumulative Impact Areas (CIAs) are designated where evidence shows that the number, type, or density of licensed premises is likely to lead to problems such as crime, disorder, or public nuisance.

This review assesses current designations across the borough using the most recent data on:

- Licensed premises density
- Alcohol-related crime
- Complaints to the council
- Temporal incident patterns
- Trend direction over time

Purpose of the Review

The purpose of this assessment is to:

- Determine whether existing CIA designations remain justified.
- Identify areas where pressures have intensified and may now meet CIA thresholds.
- Highlight areas where issues have stabilised and CIA designation may no longer be necessary.

Borough Comparison (Premises, Crime, Complaint, ASB, LAS callout, Licence premises)

The table 11 below summarises key operational and risk indicators across different areas in Southwark.

Each metric is normalised by area size (per square kilometre) to allow fair comparison between wards of varying sizes. For example, Premises Density reflects the number of licensed premises per sq. km, while Crime Density shows crime incidents per sq. km for two different time periods. Similarly, Complaints Density combines total complaints with their density, and other columns represent Anti-Social Behaviour (ASB) and ambulance callouts per sq. km.

Area	Premises Density	Crime Density	Complaints 2024/2025 (Density)	ASB Density	LAS callout Density
Borough & Bankside	275.44	167.58	60	37.93	121.37
Elephant & Castle	193.46	350	36.26	94.73	176.31
Camberwell	90.09	115.38	93.24	90.1	90.10
Peckham	176.05	148.64	128.94	62.16	72.97
Walworth	93.84	166.66	35.38	34.92	138.09
Old Kent Road	91.13	160	93.65	16.92	66.15
Others	66.74	34.85	5.48	8.37	39.02
Average	140.96	163.30	64.70	49.30	100.57

Table 40 Breakdown of Borough Comparison by Density (Premise, Crime, Complaint, ASB, LAS callout, Licence Premises)

Key decision drivers:

- **Premises Concentration:** Borough & Bankside has the highest premises density (275.44 per sq. km), suggesting a strong cluster of licensed venues. Elephant & Castle and Peckham also show high densities (193.46 and 176.05), while Camberwell and Old Kent Road remain much lower.
- **Crime Hotspots:** Elephant & Castle stands out with the highest crime density (350 per sq. km), more than double the average (163.30). Borough & Bankside and Walworth also exceed the average.
- **Complaints and Community Impact:** Complaint density is highest in Peckham (128.94 per sq. km) and Old Kent Road (93.65 per sq. km). Camberwell also shows elevated complaints (93.24 per sq. km), while “Others” has a low density despite a large total number due to its vast area.
- **ASB and Emergency Risks:** Elephant & Castle leads in ASB density (94.73 per sq. km) and ambulance callouts (176.31 per sq. km), reinforcing its high-risk profile. Camberwell also shows significant ASB incidents (90.10 per sq. km), while Walworth has very low ambulance activity despite high complaints.

Risk Ranking Summary

Each area was scored (1 = highest risk, 6= lowest risk) across five key risk metrics: Premises density, Crime (2 cohorts combined) density, Complaint density, ASB and LAS callout.

The table below ranks six areas in Southwark based on five key risk metrics: premises density, crime density (two cohorts combined), complaint density, anti-social behaviour (ASB), and London Ambulance Service (LAS) callouts. A score of 1 indicates the highest risk, while 6 represents the lowest risk for each metric. The total score determines the overall rank, with lower totals indicating higher overall risk.

Area	Premises	Crime	Complaint	ASB	LAS callout	Total Score	Ranking
Elephant & Castle	2	1	5	1	1	10	1
Borough & Bankside	1	2	4	4	3	14	2
Peckham	3	5	1	3	5	17	3
Walworth	4	3	6	5	2	21	4
Camberwell	6	6	3	2	4	23	5
Old Kent Road	5	4	2	6	6	20	6

Table 5 Risk Ranking Summary

Key decision drivers:

- **Elephant & Castle (Rank 1):** With a total score of 10 and rank 1, Elephant & Castle consistently scores 1 for crime, ASB, and LAS callouts, and 2 for premises density, making it the most concentrated risk zone.
- **Borough & Bankside (Rank 2):** Despite having the highest premises density (score 1), it shows moderate risk in crime (2) and LAS callouts (3), but lower performance in ASB (4) and complaints (4).
- **Peckham (Rank 3):** Shows a moderate risk profile, mainly due to mid-level scores in complaints (3) and ASB (3), with higher LAS callout risk (5).

- Walworth (Rank 4): Lower overall risk, but notable for high complaints (2) while ASB (5) and LAS callouts (2) remain relatively low.
- Camberwell (Rank 5): Displays dispersed risks, scoring between 4–6 across most metrics, suggesting no concentrated hotspots.
- Old Kent Road (Rank 6): Mixed profile with significant emergency and ASB risks (6 each), despite low complaints (2) and premises density (5)

Risk Ranking & Justification

Area	Ranking	Justification
Elephant & Castle	1	Highest risk across crime, ASB, and LAS callouts; moderate complaints; second in premises density.
Borough & Bankside	2	Highest premises density; strong crime risk; moderate LAS callouts; lower ASB and complaints.
Peckham	3	Moderate risk profile with mid-level ASB and complaints; higher LAS callout risk.
Walworth	4	Lower overall risk but notable for high complaints; ASB and LAS callouts remain relatively low.
Camberwell	5	Dispersed risks across metrics (scores 4–6); no concentrated hotspots.
Old Kent Road	6	Mixed profile with significant ASB and emergency risks despite low complaints and moderate premises density.

Table 12 Risk Ranking & Justification

Recommendations

Based on the assessments above, the following recommendations are made:

- Retain existing CIA for Borough & Bankside.
- Designate Elephant & Castle as a new CIA.
- Remove Peckham and Camberwell as CIA designations.
- Remove all other monitoring areas.

Peckham CIA Area	Camberwell CIA Area		Borough & Bankside CIA Street		ELEPHANT AND CASTLE MONITORING AREA
ALMOND CLOSE ALPHA STREET ATWELL ROAD BASING COURT BEATON CLOSE BELLENDEN ROAD BISHOP WILFRED WOOD CLOSE BLACKPOOL ROAD BLENHEIM GROVE BOURNEMOUTH ROAD BRAYARD'S ROAD BULL YARD CERISE ROAD CHADWICK ROAD CHOUMERT GROVE CHOUMERT MEWS CHOUMERT ROAD CICELY ROAD CLAUDE ROAD CLAYTON ROAD COLLYER PLACE CONSORT ROAD COPELAND ROAD COPELAND ROAD CORBDEN CLOSE COSTA STREET ELM GROVE GATONBY STREET GOLDSMITH ROAD GODMAN ROAD GRUMMANT ROAD HANOVER PARK HEATON ROAD HIGHSHORE ROAD HOLLY GROVE JOCELYN STREET	ADDINGTON SQUARE ALLENDALE CLOSE ARTICHOKE PLACE ASHWORTH CLOSE BADSWORTH ROAD BALDWIN CRESCENT BANTRY STREET BENHILL ROAD BLUCHER ROAD BOWYER PLACE BRISBANE STREET BROOME WAY BULLACE ROW CAMBERWELL STATION ROAD CAMBERWELL CHURCH STREET CAMBERWELL GREEN CAMBERWELL GROVE = 68-73 CAMBERWELL NEW ROAD 225-253 / 200- 228 CAMBERWELL ROAD CHURCHYARD PASSAGE COMBER GROVE COLDHARBOUR LANE 19-93 COUNCILLOR STREET COUNTY GROVE CRAWFORD ROAD DANEVILLE ROAD	HOPEWELL STREET HORSNELL CLOSE JAGO WALK JEPHSON STREET JOINERS ARMS YARD KERFIELD CRESCENT KERFIELD PLACE KIMPTON ROAD KNATCHBULL ROAD LOMOND GROVE LOVE WALK LOWTH ROAD MARY DATCHELOR CLOSE McDOWALL ROAD MEDLAR STREET MILKWELL YARD MORNA ROAD MORNINGTON MEWS NEW CHURCH ROAD NOTLEY STREET ORPHEUS STREET PHELAN CLOSE PICTON STREET REDCAR STREET RIBBON DANCE MEWS SAM KING WALK SANSOM STREET SCENA WAY SEARS STREET SELBORNE ROAD STATION TERRACE TILLINGS CLOSE	AMERICA STREET AYRES STREET BANK END BANKSIDE BARGE HOUSE STREET BARON'S PLACE BATTLE BRIDGE LANE BEAR LANE BEAR GARDENS BEDALE STREET BELVEDERE BUILDINGS BELVEDERE PLACE BITTERN STREET BLACKFRIARS ROAD BOROUGH HIGH STREET BOROUGH ROAD BOUNDARY ROW BOWLING GREEN PLACE BOYFIELD STREET BRIDGE YARD Brinton Walk BROADWALL BURRELL STREET BURROWS MEWS CALEB STREET CANVEY STREET CASTLE YARD CATHEDRAL STREET CHANCEL STREET CHAPLIN CLOSE CLINK STREET COLLINSON STREET COLOMBO STREET COPPERFIELD STREET COTTONS LANE COUNTER STREET CROSBY ROW	MARSHALSEA ROAD MELIOR STREET MELIOR PLACE MERMAID COURT MEYMOTT STREET MILCOTE STREET MINT STREET MONTAGUE CLOSE NELSON SQUARE NEW GLOBE WALK NEWCOMEN STREET NICHOLSON STREET O'MEARA STREET PARIS GARDEN PARK STREET PEPPER STREET PERKINS SQUARE PICKWICK STREET PLANTAIN PLACE POCOCK STREET PORTER STREET PONTYPOOL PLACE PRICE'S STREET QUILP STREET RAILWAY APPROACH REDCROSS WAY RENNIE STREET RISBOROUGH STREET ROCHESTER WALK ROSE ALLEY ROTARY STREET Rotherham Walk RUSHWORTH STREET SANCTUARY STREET SAWYER STREET SCORESBY STREET SCOVELL ROAD	CHURCHYARD ROW DANTE PLACE DANTE ROAD ELEPHANT AND CASTLE ELEPHANT ROAD ELLIOTT'S ROW GARDEN ROW GAUNT STREET GAYWOOD STREET GEORGE MATHERS ROAD = 1 AND 2 HAMPTON STREET HAYLES STREET HOLYOAK ROAD HOWELL WALK KELL STREET KEYWORTH PLACE KEYWORTH STREET LAMLAH STREET LONDON ROAD LONGVILLE ROAD NEWINGTON BUTTS = 1-98 NEWINGTON CAUSWAY N 91-101/66- 70 ONTARIO STREET OSWIN STREET PASTOR STREET PRINCESS STREET RAILWAY TRACK ELEPHANT STATION TO BOROUGH ROAD ROCKINGHAM STREET THOMAS DOYLE STREET TIVERTON STREET = 1 WALWORTH ROAD = 14-92A / 1-141 WOLLASTON CLOSE

KELLY AVENUE = 32-52 / 43-57 LISFORD STREET =18-22 / 11-17 LYNDHURST WAY WILLIAM MARGRIE CLOSE MARMONT ROAD MAXTED ROAD MCDERMOTT ROAD McKERRELL ROAD MEETING HOUSE LANE MELON ROAD MISSION PLACE MONCRIEFF PLACE MONCRIEFF STREET NEW THEATRE WALK OLIVER MEWS OPHIR TERRACE PARKSTONE ROAD PECKHAM ROAD = 83-109 / 78-110 PECKHAM HIGH STREET PECKHAM HILL STREET PILKINGTON ROAD PORTBURY CLOSE QUANTOCK MEWS RAUL ROAD REEDHAM STREET ROBERT KEEN CLOSE RYE LANE SANDISON STREET SANDLINGS CLOSE SPRING TIDE CLOSE STAFFORDSHIRE STREET STERNHALL LANE	DENMARK HILL = 45-97 DENMARK ROAD = Evens D'EYNSFORD ROAD DE CRESPIGNY PARK DON PHELAN CLOSE DRAYCOTT CLOSE EDMUND STREET ELMINGTON ROAD EVESHAM WALK FLODDEN ROAD=ODDS GRACE'S ROAD GRACE'S MEWS GROVE LANE = 1-55 / 2-72 HARBORD CLOSE HARVEY ROAD	TOULON STREET VALMAR ROAD VICARAGE GROVE WARNER ROAD WILSON ROAD WREN ROAD WYNDHAM ROAD	DAVIDGE STREET DIRTY LANE DISNEY PLACE DISNEY STREET DOLBEN STREET DORRIT STREET DOYCE STREET DUKE STREET HILL EMERSON STREET EWER STREET FARNHAM PLACE FENNING STREET GAMBIA STREET GLADE PATH GLASSHILL STREET GRAY STREET =EVEN GREAT GUILDFORD STREET GREAT MAZE POND GREAT SUFFOLK STREET GROTO COURT HATFIELDS 1- 2 / 5-53 HAY'S LANE HILARY MEWS HOLLAND STREET HOPTON STREET ISABELLA STREET JOAN STREET JOINER STREET KELL STREET KING JAMES COURT KING JAMES STREET KING'S BENCH STREET KING'S HEAD YARD KING'S PLACE LONDON ROAD 119-130 LANCASTER STREET LANT STREET LAVINGTON STREET LIBRARY STREET	SHORT STREET 17 -25 SILEX STREET SNOWFIELDS SOUTHWARK BRIDGE ROAD SOUTHWARK STREET ST GEORGE'S CIRCUS ST MARGARET'S COURT ST THOMAS STREET STAMFORD STREET 2-62 / 1-45 STONES END STREET STONEY STREET STURGE STREET SUDREY STREET SUMNER STREET SURREY ROW TABARD STREET TALBOT YARD TENNIS STREET THE CUT 33-53 The Queen's Walk THRALE STREET THOMAS DOYLE STREET = North Side TOOLEY STREET TOULMIN STREET TREVERIS STREET TRUNDLE STREET UFFORD STREET = EVENS AFTER 56 UNION STREET UPPER GROUND VALENTINE PLACE VINE YARD VINEGAR YARD WARDENS GROVE WATERLOO ROAD = 187-259 /19-302 WEBBER ROW
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SUMNER ROAD
SUMNER AVENUE

LITTLE DORRIT COURT
LOMAN STREET
LONDON BRIDGE STREET
MAIDEN LANE

WEBBER STREET
WELLER STREET
WHITE HART YARD
WINCHESTER SQUARE
WINCHESTER WALK
ZOAR STREET



Equality Impact and Needs Analysis Guidance Cumulative Impact Areas

Guidance notes

Things to remember:

Under the Public Sector Equality Duty (PSED) public authorities are required to have due regard to the aims of the general equality duty when making decisions and when setting policies. Understanding the affect of the council's policies and practices on people with different protected characteristics is an important part of complying with the general equality duty. Under the PSED the council must ensure that:

- Decision-makers are aware of the general equality duty's requirements.
- The general equality duty is complied with before and at the time a particular policy is under consideration and when a decision is taken.
- They consciously consider the need to do the things set out in the aims of the general equality duty as an integral part of the decision-making process.
- They have sufficient information to understand the effects of the policy, or the way a function is carried out, on the aims set out in the general equality duty.
- They review policies or decisions, for example, if the make-up of service users changes, as the general equality duty is a continuing duty.
- They take responsibility for complying with the general equality duty in relation to all their relevant functions. Responsibility cannot be delegated to external organisations that are carrying out public functions on their behalf.
- They consciously consider the need to do the things set out in the aims of the general equality duty not only when a policy is developed and decided upon, but when it is being implemented.

Best practice guidance from the Equality and Human Rights Commission recommends that public bodies:

- Consider all the [protected characteristics](#) and all aims of the general equality duty (apart from in relation to marriage and civil partnership, where only the discrimination aim applies).
- Use equality analysis to inform policy as it develops to avoid unnecessary additional activity.
- Focus on the understanding the effects of a policy on equality and any actions needed as a result, not the production of a document.
- Consider how the time and effort involved should relate to the importance of the policy to equality.
- Think about steps to advance equality and good relations as well as eliminate discrimination.
- Use good evidence. Where it isn't available, take steps to gather it (where practical and proportionate).
- Use insights from engagement with employees, service users and others can help provide evidence for equality analysis.

Equality analysis should be referenced in community impact statements in Council reports. Community impact statements are a corporate requirement in all reports to the following meetings: the cabinet, individual decision makers, scrutiny, regulatory committees and community councils. Community impact statements enable decision makers to identify more easily how a decision might affect different communities in Southwark and to consider any implications for equality and diversity.

The public will be able to view and scrutinise any equality analysis undertaken. Equality analysis should therefore be written in a clear and transparent way using plain English. Equality analysis may be published under the council's publishing of equality information, or be present with divisional/departmental/service business plans. These will be placed on the website for public view under the council's Publications Scheme. All Cabinet reports will also publish related

Equality analysis should be reviewed after a sensible period of time to see if business needs have changed and/or if the effects that were expected have occurred. If not then you will need to consider amending your policy accordingly. This does not mean repeating the equality analysis, but using the experience gained through implementation to check the findings and to make any necessary adjustments.

Engagement with the community is recommended as part of the development of equality analysis. The council's Community Engagement Division and critical friend, the Forum for Equality and Human Rights in Southwark can assist with this (see section below on community engagement and www.southwarkadvice.org.uk).

Whilst the equality analysis is being considered, Southwark Council recommends considering implications arising from socio-economic disadvantage, as socio-economic inequalities have a strong influence on the environment we live and work in. As a major provider of services to Southwark residents, the council has a policy commitment to reduce socio-economic inequalities and this is reflected in its values and aims. For this reason, the council recommends considering impacts/needs arising from socio-economic disadvantage in all equality analyses, not forgetting to include identified potential mitigating actions. **The Council has adopted the Socio-Economic Duty as part of its overall equality, diversity and inclusion policy commitments in the Southwark Equality Framework.** This requires us to ensure we do not make any conditions worse for those experiencing socio-economic disadvantage through our policies and practices.

Section 1: Equality impact and needs analysis details

Proposed policy/decision/business plan to which this equality analysis relates		REVIEW OF CUMULATIVE IMPACT AREAS IN SOUTHWARK.			
Equality analysis author		Esther Jones			
Strategic Director:		Aled Richards			
Department		Environment and Leisure	Division	Licensing	
Period analysis undertaken		October 2025			
Date of review (if applicable)		December 2025			
Sign-off		Position		Date	

Section 2: Brief description of policy

1.1 Brief description of policy/decision/business plan

The Licensing Act 2003 came into effect on 25 November 2005. The Act introduced a regime for the licensing of alcohol, regulated entertainment and late night refreshment, to be administered by the local licensing authority.

Under the Act, cumulative impact is the potential impact on the promotion of the licensing objectives of a significant number of licensed premises concentrated in one geographical area, which goes beyond that which can be dealt with via premises specific enforcement.

The CIA is a location which the Council has identified as experiencing cumulative impact and to which a CIA Policy will apply. The CIA policy placed a presumption that any new licensed premises within the defined areas would have a rebuttable presumption against the grant of the licence or the variation of the licence to increase the capacity or hours of the premises. The policy did allow for an exception if the applicant could demonstrate that the premises operation would not adversely impact the intention of the policy and add to the CIA.

The implementation and assessment of a CIA Policy must be based on data specific to alcohol-related crime. The Policy is to be kept under review, but is statutorily required to be reviewed every 3 years.

The Committee has been asked to assess the current CIA Policy, using the dataset and now the outcome of the public and statutory consultation in order to determine whether to maintain the status quo, i.e. leave it as it is, disapply it for certain areas i.e. Peckham and Camberwell and include Elephant and Castle or remove it completely.

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Section 3: Overview of service users and key stakeholders consulted

2. Service users and stakeholders	
Key users of the department or service	• Premises licence holders • Personal licence holders • Members of the public
Key stakeholders were/are involved in this policy/decision/business plan	• Internal data analysts • The Licensing Committee • Legal and Finance

Section 4: Pre-implementation equality impact and needs analysis

This section considers the potential impacts (positive and negative) on groups with 'protected characteristics', the equality information on which this analysis is based and any mitigating actions to be taken, including improvement actions to promote equality and tackle inequalities. An equality analysis also presents as an opportunity to improve services to meet diverse needs, promote equality, tackle inequalities and promote good community relations. It is not just about addressing negative impacts.

The columns include societal issues (discrimination, exclusion, needs etc.) and socio-economic issues (levels of poverty, employment, income). As the two aspects are heavily interrelated it may not be practical to fill out both columns on all protected characteristics. The aim is, however, to ensure that socio-economic issues are given special consideration, as it is the council's intention to reduce socio-economic inequalities in the borough. Key is also the link between protected characteristics and socio-economic disadvantage, including experiences of multiple disadvantage.

Socio-economic disadvantage may arise from a range of factors, including:

- poverty
- health
- education
- limited social mobility
- housing
- a lack of expectations
- discrimination
- multiple disadvantage

The public sector equality duty (PSED) requires us to find out about and give due consideration to the needs of different protected characteristics in relation to the three parts of the duty:

1. Eliminating discrimination, harassment and victimisation
2. Advancing equality of opportunity, including finding out about and meeting diverse needs of our local communities, addressing disadvantage and barriers to equal access; enabling all voices to be heard in our engagement and consultation undertaken; increasing the participation of underrepresented groups
3. Fostering good community relations; promoting good relations; to be a borough where all feel welcome, included, valued, safe and respected.

The PSED is now also further reinforced in the two additional Fairer Future For All values: that we will

- Always work to make Southwark more equal and just
- Stand against all forms of discrimination and racism

Age - Where this is referred to, it refers to a person belonging to a particular age (e.g. 32 year olds) or range of ages (e.g. 18 - 30 year olds).	
Potential impacts (positive and negative) of proposed policy review; this also includes needs in relation to each part of the duty.	Potential Socio-Economic impacts/ needs/issues arising from socio-economic disadvantage (positive and negative)
Any policy reviews must take into account protected characteristics. There is anecdotal evidence to suggest that younger independent businesses may be run by younger people. The licensing authority looks to encourage the diversity of local businesses, which would include businesses run by younger entrepreneurs.	No potential impacts are identified
Equality information on which above analysis is based	Socio-Economic data on which the above analysis is based
Census Data	N/A
Mitigating and/or improvement actions to be taken	
No mitigation is necessary.	

Disability - A person has a disability if s/he has a physical or mental impairment which has a substantial and long-term adverse effect on that person's ability to carry out normal day-to-day activities. Please note that under the PSED due regard includes: Giving due consideration in all relevant areas to "the steps involved in meeting the needs of disabled persons that are different from the needs of persons who are not disabled include, in particular, steps to take account of disabled persons' disabilities." This also includes the need to understand and focus on different needs/impacts arising from different disabilities.	
Potential impacts (positive and negative) of proposed policy review; this also includes needs in relation to each part of the duty.	Potential socio-economic impacts/ needs/issues arising from socio-economic disadvantage (positive and negative)
No specific impacts have been identified or raised in relation to this. It is acknowledged that businesses should make 'reasonable adjustments' to accommodate people who identify as having a disability. See Page 83 of the Southwark Statement of Licensing Policy. No health impacts are identified	N/A

Equality information on which above analysis is based	Socio-economic data on which above analysis is based
Census Data	N/A
Mitigating and/or improvement actions to be taken	
N/A	N/A

Gender reassignment: - The process of transitioning from one gender to another. Gender Identity: Gender identity is the personal sense of one's own gender. Gender identity can correlate with a person's assigned sex or can differ from it.	
Potential impacts (positive and negative) of proposed policy review; this also includes needs in relation to each part of the duty.	Potential socio-economic impacts/ needs/issues arising from socio-economic disadvantage (positive and negative)
This policy review will not specifically benefit or disadvantage non-binary residents or licence holders.	N/A
Equality information on which above analysis is based.	Socio-economic data on which above analysis is based
Census Data	N/A
Mitigating and/or improvement actions to be taken	
N/A	N/A

Marriage and civil partnership – In England and Wales marriage is no longer restricted to a union between a man and a woman but now includes a marriage between a same-sex couples. Same-sex couples can also have their relationships legally recognised as 'civil partnerships'. Civil partners must not be treated less favourably than married couples and must be treated the same as married couples on a wide range of legal matters. (Only to be considered in respect to the need to eliminate discrimination.)	
Potential impacts (positive and negative) of proposed policy review this also includes needs in relation to each part of the duty.	Potential socio-economic impacts/ needs/issues arising from socio-economic disadvantage (positive and negative)

CIAAs will have no particular impact on marital status and does not treat same sex couples or those in civil partnerships less or more favourably than anyone else	N/A
Equality information on which above analysis is based	Socio-economic data on which above analysis is based
Census Data	N/A
Mitigating or improvement actions to be taken	
N/A	N/A

Pregnancy and maternity - Pregnancy is the condition of being pregnant or expecting a baby. Maternity refers to the period after the birth, and is linked to maternity leave in the employment context. In the non-work context, protection against maternity discrimination is for 26 weeks after giving birth, and this includes treating a woman unfavourably because she is breastfeeding.	
Potential impacts (positive and negative) of proposed policy review; this also includes needs in relation to each part of the duty.	Potential socio-economic impacts/ needs/issues arising from socio-economic disadvantage (positive and negative)
The licensing policy must not disadvantage pregnant women or those on maternity leave. No impacts are therefore identified.	N/A
Equality information on which above analysis is based	Socio-economic data on which above analysis is based
Census Data	N/A
Mitigating and/or improvement actions to be taken	
N/A	N/A

Race - Refers to the protected characteristic of Race. It refers to a group of people defined by their race, colour, and nationality (including citizenship) ethnic or national origins. N.B. Gypsy, Roma and Traveller are recognised racial groups and their needs should be considered alongside all others	
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Potential impacts (positive and negative) of proposed policy review; this also includes needs in relation to each part of the duty.	Potential socio-economic impacts/ needs/issues arising from socio-economic disadvantage (positive and negative)
The cultural markup of the Borough is wide and varied. The Licensing Authority would want to encourage this diversity. Policy would never be intended to prevent any particular ethnic group from enjoying alcohol, late night refreshment or regulated entertainment. It should however be noted that the Borough is continually changing in terms of regenerating community areas. This has had an effect on local amenities. It has been mooted that some of the late-night economy may face sterilization with either the continuation of CIAs. However, this is a generalisation and not directed at any particular community groups. This is a potential continuation of an existing policy. No negative impacts are identified. Paragraph 162 of the Southwark Statement of Licensing Policy 2021 to 2026 states that Members of a Licensing Sub Committee may take into account factors when granting additional licences within a CIA. Members may take steps to grant a premises licence outside of the recommendations of the Policy to promote the use of licensed premises by groups that are not well serviced with licensed premises within the Borough. The groups referenced are those within a protected characteristic.	CIAs are not intended to benefit or disadvantage people because of their socioeconomic status. It is however acknowledged that there is a continuing trend for increases in business rates and rent costs to all premises adding an additional financial burden to some businesses, which is likely passed on to customers.

Equality information on which above analysis is based	Socio-economic data on which above analysis is based
Census Data	N/A
Mitigating and/or improvement actions to be taken	
N/A	N/A

Religion and belief - Religion has the meaning usually given to it but belief includes religious and philosophical beliefs including lack of belief (e.g. Atheism). Generally, a belief should affect your life choices or the way you live for it to be included in the definition.	
Potential impacts (positive and negative) of proposed policy review; this also includes needs in relation to each part of the duty.	Potential socio-economic impacts/needs/issues arising from socio-economic disadvantage (positive and negative)
CIA policy will have no apparent benefit or disadvantage to any particular religion. It should be noted that places of worship are exempt from licensing restrictions, as long as they are not being used for non-religious, commercial purposes.	N/A
Equality information on which above analysis is based	Socio-economic data on which above analysis is based
Census Data	N/A
Mitigating and/or improvement actions to be taken	
N/A	

Sex - A man or a woman.	
Potential impacts (positive and negative) of proposed policy review; this also includes needs in relation to each part of the duty.	Potential socio-economic impacts/needs/issues arising from socio-economic disadvantage (positive and negative)
CIA continuation will have no apparent benefit or disadvantage to any particular sex.	N/A

Equality information on which above analysis is based	Socio-economic data on which above analysis is based
Census Data	N/A
Mitigating and/or improvement actions to be taken	
N/A	

Sexual orientation - Whether a person's sexual attraction is towards their own sex, the opposite sex or to both sexes	
Potential impacts (positive and negative) of proposed policy/decision/business plan; this also includes needs in relation to each part of the duty.	Potential socio-economic impacts/needs/issues arising from socio-economic disadvantage (positive and negative)
Concerns are ongoing on the impacts that face LGBTIQ+ premises remaining open to provide safe spaces for that community. Significant numbers of premises have closed across London in recent years, yet this is likely to be as a result of commercial redevelopment, rather than a direct intention to reduce the number of such venues. Southwark seeks to protect all such venues. Licensing Policy changes are not intended to prevent any particular group based on LGBTIQ+ self-identification from enjoying alcohol or entertainment at night. Paragraph 162 of the Southwark Statement of Licensing Policy 2021 to 2026 currently under review, states that Members of a Licensing Sub Committee may take into account factors when granting additional licences within a CIA. Members may take steps to grant a premises licence outside of the recommendations of the Policy to promote the use of licensed premises by groups that are not well serviced with licensed premises within the Borough. The groups referenced are those within a protected characteristic.	CIAs are not intended to benefit or disadvantage people because of their socioeconomic status. It is however acknowledged that there is a continuing trend for increases in business rates and rent costs to all premises adding an additional financial burden to some businesses, which is likely passed on to customers
Equality information on which above analysis is based	Socio-economic data on which above analysis is based
Census Data	N/A

Mitigating and/or improvement actions to be taken
N/A

Human Rights There are 16 rights in the Human Rights Act. Each one is called an Article. They are all taken from the European Convention on Human Rights. The Articles are The right to life, Freedom from torture, inhuman and degrading treatment, Freedom from forced labour , Right to Liberty, Fair trial, Retrospective penalties, Privacy, Freedom of conscience, Freedom of expression, Freedom of assembly, Marriage and family, Freedom from discrimination and the First Protocol
Potential impacts (positive and negative) of proposed policy review.
Diversity is encouraged to ensure a night time economy that is representative of and meets the needs of the borough's communities.
Information on which above analysis is based
Census Data.
Mitigating and/or improvement actions to be taken
N/A

Section 5: Further equality actions and objectives

5. Further actions			
Based on the initial analysis above, please detail the key mitigating and/or improvement actions to promote equality and tackle inequalities; and any areas identified as requiring more detailed analysis.			
Number	Description of issue	Action	Timeframe
1	None	N/A	N/A

Implementation Equality Impact and Needs Analysis

Meeting Name:	Licensing Committee
Date:	29 January 2026
Report title:	Licensing Act 2003: Review of the Late-Night Levy
Ward(s) or groups affected:	All Wards
Classification:	Open
Reason for lateness (if applicable):	N/A
From:	Strategic Director of Environment, Sustainability and Leisure

RECOMMENDATION(S)

1. That the licensing committee review Southwark's Late Night Levy (LNL) and determine to: -
 - (a) maintain the levy as it is;
 - (b) extend the levy it to all late night premises;
 - (c) remove the late night levy.
2. If the levy is retained, the licensing committee is asked to agree a 30/70 levy split between the Council and Police and the licensing committee to convene a meeting on how the council's 30% portion of the revenue shall be spent from the 1 April 2026.

BACKGROUND INFORMATION

3. A "Late Night Levy" (LNL) is a fee that licensing authorities in England and Wales can choose to implement, to raise revenue from any premises that are licensed to sell or supply alcohol between 00:00 (midnight) and 06:00, towards the costs of policing the late-night economy.
4. The funds raised by LNL are split between the police and the council. Under the Police Reform Act 2011 (the 2011 Act), LNL net revenue, after deducting the cost of collection and administration, must be divided with at least 70% going to the police.
5. The local authority is required to use its portion of the Levy on activities, which must be related to mitigating the impact of the supply of alcohol and associated activity, within the specified hours, namely:
 - The reduction or prevention of crime and disorder
 - The promotion of public safety

- The reduction or prevention of public nuisance
 - The cleaning of any relevant highway or land in its area.
6. The levy applies whether the authorised hours for the sale or supply of alcohol under the licence held are used or not by the premises.
 7. Exemptions from the LNL:
 - a) Premises with overnight accommodation (this exemption does not apply to any premises which serve alcohol to members of the public who are not staying overnight at the premises).
 - b) Theatres and cinemas (this exemption only applies if alcohol is sold during the late-night supply period, only for consumption on the premises, to ticket holders, participants in the production or invited guests to private events; they must be bona-fide theatres or cinemas, and the sale of alcohol must not be their primary purpose).
 - c) Community amateur sports clubs (these are clubs registered as community amateur sports clubs that are entitled to various tax concessions including relief from business rates).
 - d) New Year's Eve premises only (this applies to premises which are authorised to sell/supply alcohol between midnight and 06:00 and applies on New Year's Day only).
 8. Temporary event notices are exempt from the late-night Levy because they are not included within the scope of the legislation governing the levy.
 9. The money collected by the local authority requires that at least 70% of all monies collected must be passed to the police and crime commissioner to fund activities like crime and disorder reduction in the night-time economy.
 10. Under section 142 of the Policing and Crime Act 2017, several changes were made to the late-night levy which came into force in July 2023.

Key changes introduced by Section 142:

- **Targeted areas:** Allows licensing authorities to apply the late-night levy to smaller, specific geographical zones within their area, instead of the entire district.
- **Inclusion of late-night refreshment:** Extends the levy to cover businesses providing late night refreshment, not just alcohol.
- **PCC involvement:** Enables Police and Crime Commissioners to request that a licensing authority introduce a levy in their area.
- **Transparency:** Requires licensing authorities to publish information explaining how the funds raised by the levy are spent.

11. These changes commenced as of 13 July 2023. The intention of these changes is to make the levy more flexible for local areas, fairer to business and more transparent. It is noted to date that Southwark Council has not taken into account the changes brought in.
12. The LNL supports the aim of Southwark's licensing policy, which is to uphold the licensing objectives by creating further opportunities to reduce crime and disorder, public nuisance and the public safety risks, that are created by the supply of alcohol and late night refreshment in the late night economy time period.

Southwark's Approach to Late Night Levy

13. The Council Assembly adopted the late-night levy on 17th July 2019 with an implementation date of 1st September 2019 and agreed to divert up to 100% of the LNL revenue to the Police as opposed to the 70/30% split outlined in the legislation.
14. It also agreed that a reduction of 30% be granted to premises licence holders in relation to on-trade premises that are in receipt of Small Business Rate Relief (as specified in Part III of the Local Government Finance Act 1988) and have a rateable value of £12,000 or less.
15. The Levy currently funds a night-time economy (NTE) Police team. This team works with council enforcement officers, to independently visit and inspect licensed premises and deal with incidents and complaints arising from licensed premises operating in the nighttime economy.
16. The Levy does not fund Licensing officers' weekend overtime costs, which amount to approximately £40,000 per year. These costs are met from existing divisional revenue budgets.
17. The initial police resource comprised one Police Sergeant (PS) and four Police Constables (PCs) at an annual cost of £298,000. This cost was subject to a 2.5% uplift under the police remuneration scheme, increasing the total to £316,750. Currently, under the Section 92 agreement, the 2025/26 grant allocation is £477,500, funding one PS and five PCs primarily focused on Night-Time Economy activities.
18. The levy raised is estimated at £370,000, requiring a £107,000 contribution from revenue budgets (General Fund) to meet the full cost of the Police Service. Ideally, the levy should be at least equivalent to or greater than the total policing cost to avoid reliance on additional
19. The current s.92 agreement with the police expires in March 2026. If a decision to revoke the levy were taken, alternative funding would have to be identified, or this service would be at risk.

20. Any decision to suspend or revoke the LNL must be taken by the council assembly, but the licensing committee will need to make a recommendation.
21. The current s.92 agreement expires 31 March 2026. If no contract is in place, any money collected after this date must be refunded.

Income generated

22. The LNL is designed to be self-financing, with council administration and collection expenses deducted from gross receipts, before the remaining funds are allocated to relevant activities.
23. In 2019, the potential maximum income was calculated based on the rateables value¹ of 439 premises. No further review has been carried out since.
24. Our records as at October 2025, demonstrate that since 2019, a total of 89 premises have varied their licences to reduce their hours of operation so as to avoid paying the levy. Currently a total of 347 premises is liable to pay the LNL. In 2024 a total of 17 premises were suspended for non-payment of the levy and the licences remain suspended.
25. The table below presents income received from the Late Night Levy (LNL) over the past three financial years (2023/24 to 2025/26). The figure for 2025/26 reflects actual receipts as of December 2025. The largest collections typically occur in November and December each year, when a significant proportion of licence fees become due. Based on this trend, the projected total for 2025/26 is estimated at £360,000.

Month	2023/24	2024/25	2025/26
April	(46,459)	(37,715)	(15,586)
May	(16,539)	0	(2,688)
June	(11,209)	(20,400)	0
July	(39,158)	(47,797)	(53,027)
August	(36,254)	(22,341)	(36,964)
September	917	(14,058)	(36,117)
October	(184,602)	(177,156)	(768)
November	(32,712)	(9,170)	(183,789)
December	5,117	(5,976)	(12,980)
January	0	(20,841)	
February	1,365	1,554	
March	(3,286)	1,536	
Total	(362,820)	(352,363)	(341,919)

¹ These are Statutory fees and there is no discretion for council to set the fees.

Potential Income from April 2026

26. After evaluating the licensed premises and assessing the potential revenue from late-night refreshment operators, the table below presents the payable Late Night Levy (LNL) amount for holders based on the non-domestic rateable value of commercial properties within each designated band.

Ratable value bands (based on the existing fee bands)						
A	B	C	D	E	D x 2	E x 3
No rateable value to £4,300	£4,301 to £33,000	£33,001 to £87,000	£87,001 to £125,000	£125,001 and above	Multiplier applies to premises in category D that primarily or exclusively sell alcohol	Multiplier applies to premises in category E that primarily or exclusively sell alcohol
Annual levy charges						
£299	£768	£1,259	£1,365	£1,493	£2,730	£4,440

27. A multiplier is applied to premises in Band D and E that primarily or exclusively sell alcohol for consumption on the premises. This will ensure that larger clubs and bars make a higher contribution towards the levy.
28. The table below sets out the current number of licensed premises in each band that are liable to pay the LNL from its inception in 2019 to 31 December 2025.

Bands	2025
Band A: 0 - 4300	38
Band B: 4301 - 33,000	157
Band C: 33,001 - 87,000	128
Band D (No Multiplier) : 87,001 - 125,000	36
Band E (No Multiplier) : 125,001 and over	96
Band E (With Multiplier) : 125,001 and over	1
Total	456

Premises wishing to avoid the LNL

29. Since its inception in 2019 some premises with late night authorisations reduced their licensing hours, via a minor variation of their premises licence, so that the LNL will not apply to their premises. The application fee was waived by the authority if an application was submitted within two

months from the start of the levy. It is not possible to predict the number of premises that will continue to do each year as this is outside the scope of the licensing authority. The only certainty is that it will impact on the actual amount of levy raised.

30. Operators could add a premises license condition by means of a minor variation, stating that the licence does not authorise the sale of alcohol during the late-night supply period. This is similar to a condition stating that the premises will not sell alcohol while the levy has effect, which is widely accepted in existing levy areas to preserve hours, but avoid the levy if they are not operating at relevant hours. However, with the introduction of late night refreshment this may not provide the desired effect unless they also include the provision of late night refreshments.

KEY ISSUES FOR CONSIDERATION

Recommendation 1(a) – Retain the current Late Night Levy

31. To retain the existing levy as currently in place, namely for premises with authorised hours for the sale or supply of alcohol.
32. Should the existing levy be retained, the committee is asked to determine recommendation 2, to agree a 30/70 levy split between the Council and Police and the licensing committee convene a meeting on how the council's 30% portion of the revenue shall be spent from the 1 April 2026.

Recommendation 1(b) - Variation to the current Late Night Levy

33. A proposal to extend the Late Night Levy to include late night refreshment premises operating between midnight and 6:00 am was approved by the Licensing Committee in September 2025 and subsequently subjected to a six-week statutory public consultation as part of the Licensing Policy 2026–31.
34. A formal public notice was published on the council's website and local newspaper, with a further 4 week public consultation took place between 24 November 2025 to 22 December 2025. The consultation offered respondents an opportunity to comment on the variation of the levy.
35. The consultation received 15 responses from a mixture of businesses, residents and licensing solicitors of which 3 solicitors merely sought clarity on the proposal, and no further comments were made. The feedback recorded has been analysed, and details of the results are provided in **Appendix A**, for the committee to review for consideration.

Recommendation 1(c) – Remove the Late Night Levy

36. If a decision is made for the LNL to be revoked from April 2026 then the council can subsequently re-introduce the levy at some future date, subject to following the statutory procedures, which would include carrying out a full consultation exercise again similar to when it was first introduced.

Recommendation 2 - Agree a 30/70 levy split between the Council and Police and the licensing committee convene a meeting on how the council's 30% portion of the revenue shall be spent from the 1 April 2026.

37. Under the current section 92 arrangements, the Police retain 100% of the late-night levy. However, the recommendation is for the authority to retain 30% of the levy. This allocation could be used to strengthen licensing-related initiatives such as enhanced compliance checks, funding additional licensing enforcement officers, supporting best-practice training for premises, and developing community safety campaigns to reduce alcohol-related harm.
38. These changes are timely given the recent shift in Police approach to licensing and the amendments introduced under section 142 of the Policing and Crime Act 2017, which came into force in July 2023, allowing greater flexibility in how the levy is applied and shared.
39. The Police in London are now centralising licensing resources, meaning decisions on resource allocation will be determined at a strategic level rather than locally. This shift reflects a move towards an intelligence-led, risk-based approach, focusing on high-risk premises and hotspot areas.
40. Retaining 30% of the levy locally would enable the authority to complement this centralised model by funding local initiatives that support compliance and community safety, ensuring that local priorities are not overlooked.
41. As stated in para. 4, under the 2011 Act, LNL, net revenue, after deducting the cost of collection and administration, must be divided with 70% going to the police and 30% to the council. These monies could be spent on the police NTE contract, as the income raised through the levy does not cover the full cost of this service.
42. Before these percentages are divided, a licensing authority can deduct the costs it incurs in connection with the introduction or variation, administration, collection and enforcement of the levy. This happens prior to the levy revenue being apportioned between the police and licensing authority. The regulations prescribe the expenses which may be deducted before apportionment.

43. The deductible costs may include (but are not necessarily limited to) the following:
- The preparation and publication of the consultation document, including publishing it online and sending details to the police and crime commissioner, the relevant chief officer of police and all premises licence and club premises certificate holders whose authorisations permit the supply of alcohol after midnight on any day
 - The collection of levy payments
 - The enforcement of levy payments
 - The cost of processing applications for a variation in relation to the introduction of the levy.

Governance

44. There are no specific restrictions on the amount of the expenses which licensing authorities can claim. However, licensing authorities have to account for their expenses following existing procedures.
45. During the initial consultation in 2019, Southwark indicated that a "board" would be responsible for deciding how to allocate 30% of the levy funds. This board would consist of members from the licensing committee and would report its decisions to the full committee. It can also seek non-binding advice on spending from any interested parties, such as a Business Information District (BID) or a resident association. The licensing authority has expressed concern that even when fully collected, the levy has not brought in as much income as expected. Additionally, the cost of the police NTE contract has increased. Ideally, revenue from this levy should be used to cover council resources needed for the nighttime economy, such as officers' overtime.
46. The Act does not detail board operations; the board should follow standard local authority governance rules. Accordingly, decisions regarding the allocation of the levy surplus may be taken by the licensing committee, a designated sub-committee, or an officer with delegated authority, pursuant to Section 101 of the Local Government Act 1972.
47. Authority to delegate decision-making to a board consisting of volunteer representatives from the police, licensed trade, and residents does not exist. While such a board may be formed to provide recommendations to the licensing committee, sub-committee, or authorised officer, it cannot serve as an independent decision-making body.

Community, equalities (including socio-economic) and health impacts

Community impact statement

48. Southwark's statement of licensing policy aims to achieve a balance between providing a platform upon which responsible business operators may contribute toward a thriving business and late-night economy, whilst ensuring that the quality of life of those who live and work in the borough is protected and enhanced through the licensing system.
49. The policy seeks to provide the necessary balance between responsible business operators contributing toward a thriving business and late night economy whilst ensuring that the quality of life of those who live and work in the Borough is protected and enhanced through the licensing system. We believe these aims are achievable if all parties concerned work together.
50. Expenditure of the income generated from the levy has a positive impact on the wider community by reducing the potential for alcohol-related crime and anti-social behaviour, thereby improving the quality of life of residents and enhancing the enjoyment of visitors to the borough.

Equalities (including socio-economic) impact statement

51. Equality impact assessments are an essential tool to assist Councils to comply with the equalities duties and to make decisions fairly. Equalities and human rights impact assessments that are carried out should be mindful of the protected characteristics under the Equality Act 2010.
52. Members will need to consider whether there are any potential negative impacts on the protected characteristics as outlined in the assessment at the Committee Hearing. A further assessment has carried out following the public and statutory consultation in preparation for returning to the Licensing Committee. The current assessment is available in **Appendix B**. Any decision made by Members of the Committee will also have to hold this in mind.

Health impact statement

53. Licensing policies have an important role in promoting a healthier environment and protecting public health in Southwark. This policy enables licensed premises to introduce operating practices that aim to minimise risks to health and safety, such as binge drinking, accidents, and violence. It also allows the authority to restrict new licenses where the cumulative impact of licensed premises is negatively affecting local communities, through nuisance or disorder. Areas with high densities of licensed premises can be associated with increased rates of alcohol related hospital admissions, ambulance call outs, crime and antisocial behaviour. The policy can support licensing practice that reduces alcohol-related harm, which can disproportionately affect vulnerable communities.

Climate change implications

54. On 27 March 2019, the council declared a climate emergency and considers the implications of climate change in all of its decisions.
55. Southwark expects patrons to be mindful that Southwark has declared a climate emergency. In this context, operational measures such as abstaining from the use of patio heaters and avoiding the use of single-use plastics and following government guidance may be considered.
56. A review of the late night levy is not intended to have a negative impact on climate change.

Financial implications

57. The annual Metropolitan Police costs of approx. £477,000 is funded by the Late Night Levy (LNL) and the general fund. The review of the LNL may have resource implications for the council. The LNL is intended to be self-financing, with administration and collection costs deducted from gross receipts prior to allocating the remaining funds to designated activities. However, in the absence of the LNL or if there is a reduction in LNL income, there exists a significant risk of funding shortfalls for the Night-Time Economy (NTE) team costs, which would need to be addressed through alternative sources within the regulatory services budget.

SUPPLEMENTARY ADVICE FROM OTHER OFFICERS

Assistant Chief Executive - Governance and Assurance

58. The Police Reform and Social Responsibility Act 2011 ("the 2011 Act") allows the council to raise revenue from any premises that are licensed to sell or supply alcohol by way of a Late Night Levy (LNL). The powers to introduce the LNL come from within the 2011 Act.
59. In considering whether to introduce a LNL, the council must first consider whether it is worth having the Levy, having regard to the current cost of tackling the crime and disorder caused by the night time economy, and essentially due to those premises licensed to sell or supply alcohol between 00:00 (midnight) and 06:00.
60. The funds raised are used to contribute to the costs of policing the late-night economy and at least 70% of the net revenue must be given to the police.
61. On 13 July 2023, Section 142 of the Policing and Crime Act 2017 was amended to give licensing authorities the power to:
 - Apply the levy to late night refreshment (LNR) premises.
 - Target the levy at specific geographical areas, rather than the whole local authority area.

- Allow a 30% reduction to LNR premises that qualify for Small Business Rate Relief.
62. The 2011 Act does not prohibit the local authority and police from agreeing to a different agreement with regard to the use of the funds raised in the future.
63. Should the licensing committee determine to remove the LNL, it would be a matter for council assembly to ratify the decision to remove it pursuant to Schedule 1 of The Local Authorities (Functions and Responsibilities) (England) Regulations 2000, as amended in 2013.

Strategic Director of Resources (ESL25/127)

64. The Strategic Director of Resources (SDR) notes the recommendations in this report is requesting the licensing committee to consider the recommendations set out in paragraph 1 above
65. The Strategic Director Resources also notes the financial implications and the potential additional financial implications arising from changes to the level of the Levy.
66. Officer time and any other running costs connected with these recommendations are to be contained within existing departmental revenue budgets.

BACKGROUND DOCUMENTS

Background Papers	Held At	Contact
The Licensing Act 2003 plus secondary regulations	Southwark Licensing C/o 160 Tooley Street, London SE1 2QH	Mrs Esther Jones Email: esther.jones1@southwark.gov.uk
Alcohol Licensing: Late Night Levy July 2025 (House of Commons Library)		
Crime and Policing Act 2011 (as amended 2017)		
Police Reform and Social Responsibility Act 2011.		
The Late Night Levy (Application and Administration) Regulations 2012 and The Late Night Levy (Expenses, Exemptions and Reductions) Regulations 2012		

APPENDICES

No.	Title
Appendix A	Variation of Levy Consultation results
Appendix B	Equalities Impact and Needs Analysis Report

AUDIT TRAIL

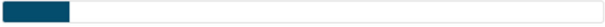
Lead Officer	Aled Richards, Strategic Director of Environment, Sustainability and Leisure		
Report Author	Bina Patel, Business Unit Manager Neighbourhood Nuisance		
Version	Final		
Dated	24 December 2025		
Key Decision?	Yes		
CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / CABINET MEMBER			
Officer Title	Comments Sought	Comments Included	
Assistant Chief Executive – Governance and Assurance	Yes	Yes	
Strategic Director of Resources	Yes	Yes	
Cabinet Member	No	No	
Date final report sent to Constitutional Team		15 January 2026	

Late Night Levy – variation to include Late Night Refreshment Premises

Consultation Responses

Email Responses	
Solicitor representing Greene King Pub Partners.	We are responding on behalf of our client Greene King Pub Partners ('GKPP') to the consultation on the Late Night Levy. The consultation process is, we understand, part of the statutory Late Night Levy regime introduced in 2012 and amended in 2017. GKPP operate 2 premises in the borough- one currently affected by the LNL and the other not. This response is separate to any response you may receive Greene King's managed pub estate in the Borough. Adding Late Night refreshment to the LNL We would support the council's desire to ensure that all businesses operating after midnight are equally treated. On the face of it, that would suggest adding more premises into the LNL scheme would be in line with this. However, the LNL by its very nature, divides businesses between those licensed the those that are not irrespective of their trading into the levy hours. This, in and of itself, is unfair and as such businesses that pay into the local BID, as well as being charged the LNL are currently being required to pay two separate fees based on rateable value of their premises- outside of the rates themselves. You will be aware that for a number of businesses in the hospitality sector, April 2026 is going to be particularly challenging as rate reliefs are clawed back and businesses already on the cusp of serious financial hardship will be expected to find additional revenue to meet this increased tax burdens. For some, it is predicted, this may result in closure. For this reason, we strongly urge the council to consider the validity of retaining the LNL within the Borough during this particularly challenging time for businesses. Continued validity of a late night levy The Government has signalled its intent in the recent Licensing Sprint to put business growth and the economy at the heart of licensing. The recent change to the S.182 Guidance now requires licensing authorities: <i>"1.18 When making licensing decisions, all licensing authorities should consider the need to promote growth and deliver economic benefits"</i> The LNL in and of itself, is a charge on businesses that prevents growth and investment into the businesses themselves. We appreciate that the council is looking to raise revenue, but this additional levy prevents investment and that can affect the profitability of businesses as they need to make hard decisions as to whether to invest or not. You will have noticed that many individual businesses are already making these hard choices by choosing not to open on quieter days and the number of business closures in the sector is on the rise. This in turn reduces income, working hours for staff and the ability for a business to invest. Successful businesses pay more in taxes, rates, National Insurance Contributions and, where relevant, local BIDs. With a significant number of hospitality premises reporting low to no profits, we would strongly urge the Licensing Authority to take this into account when calculating the value of the LNL to the local economy. Exemptions/ Reductions We note the specific exemptions as listed. However, we note that, for example, New Year's Eve is not exempted. This, we suggest, should be revisited if the intention is to retain or expand the LNL. Many premises have some limited hours extensions for New Year's Eve which they may or may not take advantage of. Other premises routinely put TENS in to extend hours. To have one group subject to the levy irrespective of whether they use the later hours on their licence or not, whilst others specifically applying to go into the levy period without having to pay the levy, is iniquitous. Conclusion It is our submission that the LNL that has been in place since 2019 is in fact a drain on businesses and needs to be reconsidered in its entirety given the challenging trading conditions licensed premises find themselves in. The council's ability to raise revenue in a sustainable and long-term way, we submit, comes from having a healthy and thriving hospitality sector that is well invested and growing. As matters stand, the opposite is true and we therefore recommend that the council give serious consideration to scrapping the LNL altogether.
HCA Healthcare	Thank you for the information I trust HCA London #Bridge Hospital and HCA at Guys Hospital as an Healthcare environments where only overnight inpatients will be served between the hours on 00.00 and 06.00 is exempt from any action and levy ?
Solicitor	I hope you are well and thank you for the below notification. I note the proposal confirms that the Levy will apply to businesses that serve hot food or drinks from 00:00 – 06:00. Please could you confirm if this means premises that sell hot food or hot food and hot drinks, and will not apply to premises that only sell hot drinks? I note under section 127 (2A) of the Police Reform and Social Responsibility Act 2011 it confirms that businesses are not liable to pay the Levy if only hot drinks are supplied. I look forward to hearing from you. Kind regards, Paige

Business – Borough & Bankside	The only comment I wish to make is that I support an additional late night levy. London needs to be a 24 hour city like so many other major metropolises. Licensed premises, in order to meet their outgoings, need the ability to trade for as many hours that are feasible and can bring them a return. Ultimately this extra revenue benefits the country as a whole as the revenue from Vat increases. I understand that the cost of monitoring late night operations is an expense which has to be shared by late night operators. It is essential that the public knows that, prolonged hours enjoyed by operators, are safe. The surveillance does entail very unsocial hours for the licensing team. There is no getting away from it that these are at a premium.
3 solicitors	Thanks. For the avoidance of any doubt does that mean that you're proposing to maintain the NYE exemption or remove it? <i>Clarification provided that the existing exemptions, introduced since the LNL was implemented in 2019, remain in effect. This variation seeks to include premises licensed to provide the provision of late-night refreshment between midnight and 6 am.</i>
Online Responses to Survey	
This helps us to understand who we are reaching with our public surveys. Resident 77.8% (7 choices)  Licence Holder 11.1% (1 choice)  Legal Representative (Licensing) 11.1% (1 choice)  Licensing Consultant 0% (0 choices)  Other (please specify) 11.1% (1 choice) 	
3. Do you agree with the proposal to include late night refreshment premises in the Late Night Levy? 9/9 - Multiple choice - choose one - optional Yes 44.4% (4 choices)  No 44.4% (4 choices)  Not Sure 11.1% (1 choice) 	Most respondents expressed strong concerns that extending the Late Night Levy to late night refreshment premises would have a highly negative impact on businesses, particularly small and independent operators already struggling with high costs and economic pressures There is a common view that the proposal would discourage late-night trading, threaten the viability of venues, and undermine London's reputation and competitiveness as a global city for culture and nightlife Several respondents argued that the financial burden of supporting the night-time economy should not fall on businesses alone, especially when there is no clear evidence that late night refreshment venues are more responsible for issues like waste, noise, or policing than daytime businesses. Some suggested that residential concerns could be better managed through targeted measures such as noise control and public safety patrols, rather than blanket levies. A minority view indicated limited impact and felt it was fair for these premises to contribute but overall, the dominant trend was opposition to the proposal due to concerns about financial strain, business closures, and negative effects on the local night-time economy.
5. Do you have any alternative suggestions for managing the costs of the night-time economy? 8/9 - Long answer - optional	Many respondents questioned the fairness of extending the Late Night Levy to late night refreshment premises, with several suggesting that costs should be targeted at businesses or areas generating the most antisocial behaviour or noise complaints, rather than applying a blanket charge. There was a recurring view that alcohol-led venues should pay more, as they contribute more to cleaning and security costs, while food outlets should face lower charges due to smaller profit margins and their essential role for residents. Some respondents argued that the costs of the night-time economy are not proven to be disproportionate compared to daytime, and should be considered as part of overall borough services rather than separately There were calls for more evidence-based approaches and for local authorities to focus on collaboration and incentives for responsible business practices, rather than imposing restrictive measures. A minority supported the levy or had no alternative suggestions. One respondent questioned whether managing these costs should fall within the council's existing responsibilities.

		Overall, the most common themes were opposition to blanket charges, support for targeted or tiered approaches, and a desire to encourage rather than penalise late night food businesses.	
Demographics			
6. Age 8/9 - Multiple choice - choose one - optional		7. What is your ethnic background? 7/9 - Multiple choice - choose one - optional	
25 – 34 22.2% (2 choices) 		(White) British 33.3% (3 choices) 	
35 – 44 22.2% (2 choices) 		No answer 22.2% (2 choices) 	
45 – 54 22.2% (2 choices) 		(Asian) Chinese 11.1% (1 choice) 	
55 – 64 11.1% (1 choice) 		(White) Other (please specify if you wish below) 11.1% (1 choice) 	
75 – 84 11.1% (1 choice) 		(White) Other European 11.1% (1 choice) 	
No answer 11.1% (1 choice) 		(White) English 11.1% (1 choice) 	
Under 16 0% (0 choices) 		Arab 0% (0 choices) 	
8. If Other, please specify further if you wish 1/9 - Short answer - optional		9. Are you disabled? 8/9 - Multiple choice - choose one - optional	
All responses (1) Spanish		No 66.7% (6 choices) 	
		Yes 11.1% (1 choice) 	
		Prefer not to say 11.1% (1 choice) 	
		No answer 11.1% (1 choice) 	
10. Please tick the box or boxes below that best describe your disability: 2/9 - Multiple choice - choose many - optional		11. What is your sex as recorded at birth? 8/9 - Multiple choice - choose one - optional (A question about Gender Identity will follow)	
No answer 77.8% (7 choices) 		Male 44.4% (4 choices) 	
Hearing / Vision (e.g. deaf, partially deaf or hard of hearing; blind or partial sight) 11.1% (1 choice) 		Female 44.4% (4 choices) 	
Physical / Mobility (e.g. wheelchair user, arthritis, multiple sclerosis etc.) 11.1% (1 choice) 		No answer 11.1% (1 choice) 	
Mental health (lasting more than a year. e.g. severe depression, schizophrenia etc.) 11.1% (1 choice) 		Prefer not to say 0% (0 choices) 	
Learning disability (e.g. dyslexia, dyspraxia etc.) 11.1% (1 choice) 		Other 0% (0 choices) 	
Long-term illness or health condition (e.g. Cancer, HIV, Diabetes, Chronic Heart disease, Rheumatoid Arthritis, Chronic Asthma) 11.1% (1 choice) 			
Prefer not to say 0% (0 choices) 			

12. Is the Gender you identify with the same as the sex you were recorded at birth? 8/9 - Multiple choice - choose one - optional Yes 88.9% (8 choices) No answer 11.1% (1 choice) No 0% (0 choices) Prefer not to say 0% (0 choices)	14. Which of the following best describes your sexual orientation? 6/9 - Multiple choice - choose one - optional Heterosexual/straight 33.3% (3 choices) No answer 33.3% (3 choices) Gay man 22.2% (2 choices) Lesbian/Gay woman 11.1% (1 choice) Bisexual 0% (0 choices) Prefer not to say 0% (0 choices) Other 0% (0 choices)
15. What is your religion or belief? 5/9 - Multiple choice - choose one - optional No religion 55.6% (5 choices) No answer 44.4% (4 choices) Buddhist 0% (0 choices) Christian 0% (0 choices) Hindu 0% (0 choices)	16. Approximately, what is your household income 6/9 - Multiple choice - choose one - optional (The combined income of all the people in your home)? £90,000 or above 33.3% (3 choices) No answer 33.3% (3 choices) £45-59,999 per year 11.1% (1 choice) £75-89,999 per year 11.1% (1 choice) Prefer not to say 11.1% (1 choice) Under £15,000 per year 0% (0 choices)



Equality Impact and Needs Analysis Guidance

Late Night Levy – variation

Guidance notes

Things to remember:

Under the Public Sector Equality Duty (PSED) public authorities are required to have due regard to the aims of the general equality duty when making decisions and when setting policies. Understanding the affect of the council's policies and practices on people with different protected characteristics is an important part of complying with the general equality duty. Under the PSED the council must ensure that:

- Decision-makers are aware of the general equality duty's requirements.
- The general equality duty is complied with before and at the time a particular policy is under consideration and when a decision is taken.
- They consciously consider the need to do the things set out in the aims of the general equality duty as an integral part of the decision-making process.
- They have sufficient information to understand the effects of the policy, or the way a function is carried out, on the aims set out in the general equality duty.
- They review policies or decisions, for example, if the make-up of service users changes, as the general equality duty is a continuing duty.
- They take responsibility for complying with the general equality duty in relation to all their relevant functions. Responsibility cannot be delegated to external organisations that are carrying out public functions on their behalf.
- They consciously consider the need to do the things set out in the aims of the general equality duty not only when a policy is developed and decided upon, but when it is being implemented.

Best practice guidance from the Equality and Human Rights Commission recommends that public bodies:

- Consider all the [protected characteristics](#) and all aims of the general equality duty (apart from in relation to marriage and civil partnership, where only the discrimination aim applies).
- Use equality analysis to inform policy as it develops to avoid unnecessary additional activity.
- Focus on the understanding the effects of a policy on equality and any actions needed as a result, not the production of a document.
- Consider how the time and effort involved should relate to the importance of the policy to equality.
- Think about steps to advance equality and good relations as well as eliminate discrimination.
- Use good evidence. Where it isn't available, take steps to gather it (where practical and proportionate).
- Use insights from engagement with employees, service users and others can help provide evidence for equality analysis.

Equality analysis should be referenced in community impact statements in Council reports. Community impact statements are a corporate requirement in all reports to the following meetings: the cabinet, individual decision makers, scrutiny, regulatory committees and community councils. Community impact statements enable decision makers to identify more easily how a decision might affect different communities in Southwark and to consider any implications for equality and diversity.

The public will be able to view and scrutinise any equality analysis undertaken. Equality analysis should therefore be written in a clear and transparent way using plain English. Equality analysis may be published under the council's publishing of equality information, or be present with divisional/departamental/service business plans. These will be placed on the website for public view under the council's Publications Scheme. All Cabinet reports will also publish related

Equality analysis should be reviewed after a sensible period of time to see if business needs have changed and/or if the effects that were expected have occurred. If not then you will need to consider amending your policy accordingly. This does not mean repeating the equality analysis, but using the experience gained through implementation to check the findings and to make any necessary adjustments.

Engagement with the community is recommended as part of the development of equality analysis. The council's Community Engagement Division and critical friend, the Forum for Equality and Human Rights in Southwark can assist with this (see section below on community engagement and www.southwarkadvice.org.uk).

Whilst the equality analysis is being considered, Southwark Council recommends considering implications arising from socio-economic disadvantage, as socio-economic inequalities have a strong influence on the environment we live and work in. As a major provider of services to Southwark residents, the council has a policy commitment to reduce socio-economic inequalities and this is reflected in its values and aims. For this reason, the council recommends considering impacts/needs arising from socio-economic disadvantage in all equality analyses, not forgetting to include identified potential mitigating actions. **The Council has adopted the Socio-Economic Duty as part of its overall equality, diversity and inclusion policy commitments in the Southwark Equality Framework.** This requires us to ensure we do not make any conditions worse for those experiencing socio-economic disadvantage through our policies and practices.

Section 1: Equality impact and needs analysis details

Proposed policy/decision/business plan to which this equality analysis relates		REVIEW OF LATE-NIGHT LEVY IN SOUTHWARK.			
Equality analysis author		Esther Jones			
Strategic Director:		Aled Richards			
Department		Environment and Leisure	Division	Licensing	
Period analysis undertaken		November 2025			
Date of review (if applicable)					
Sign-off		Position		Date	



Section 2: Brief description of policy

1.1 Brief description of review

The Licensing Act 2003 came into effect on 25 November 2005. The Act introduced a regime for the licensing of alcohol, regulated entertainment and late night refreshment, to be administered by the local licensing authority.

The Police Reform and Social Responsibility Act 2011 permits licensing authorities to charge a Late Night Levy (LNL) on persons who operate premises selling alcohol between 00:00 (midnight) and 06:00hrs. The council elected to bring in the LNL in 2019. The resultant income must be spent on policing, regulating and providing support services within the late night levy period. Amendments were made to the Act in 2023 that widened the scope of LNL.

As a result of conducting the Equality Analysis the implementation of the Late Night Levy does not appear to have any adverse effects on people who share protected characteristics and no further actions are recommended at this stage.

Section 3: Overview of service users and key stakeholders consulted

2. Service users and stakeholders

Key users of the department or service	• Premises licence holders • Personal licence holders • Members of the public
Key stakeholders were/are involved in this review.	• Internal data analysts • The Licensing Committee • Legal and Finance

Section 4: Pre-implementation equality impact and needs analysis

This section considers the potential impacts (positive and negative) on groups with 'protected characteristics', the equality information on which this analysis is based and any mitigating actions to be taken, including improvement actions to promote equality and tackle inequalities. An equality analysis also presents as an opportunity to improve services to meet diverse needs, promote equality, tackle inequalities and promote good community relations. It is not just about addressing negative impacts.

The columns include societal issues (discrimination, exclusion, needs etc.) and socio-economic issues (levels of poverty, employment, income). As the two aspects are heavily interrelated it may not be practical to fill out both columns on all protected characteristics. The aim is, however, to ensure that socio-economic issues are given special consideration, as it is the council's intention to reduce socio-economic inequalities in the borough. Key is also the link between protected characteristics and socio-economic disadvantage, including experiences of multiple disadvantage.

Socio-economic disadvantage may arise from a range of factors, including:

- poverty
- health
- education
- limited social mobility
- housing
- a lack of expectations
- discrimination
- multiple disadvantages

The public sector equality duty (PSED) requires us to find out about and give due consideration to the needs of different protected characteristics in relation to the three parts of the duty:

1. Eliminating discrimination, harassment and victimisation
2. Advancing equality of opportunity, including finding out about and meeting diverse needs of our local communities, addressing disadvantage and barriers to equal access; enabling all voices to be heard in our engagement and consultation undertaken; increasing the participation of underrepresented groups
3. Fostering good community relations; promoting good relations; to be a borough where all feel welcome, included, valued, safe and respected.

The PSED is now also further reinforced in the two additional Fairer Future For All values: that we will

- Always work to make Southwark more equal and just
- Stand against all forms of discrimination and racism

Age - Where this is referred to, it refers to a person belonging to a particular age (e.g. 32-year-olds) or range of ages (e.g. 18 - 30-year-olds).	
Potential impacts (positive and negative) of proposed policy review; this also includes needs in relation to each part of the duty.	Potential Socio-Economic impacts/needs/issues arising from socio-economic disadvantage (positive and negative)
Any policy reviews must take into account protected characteristics. There is anecdotal evidence to suggest that younger independent businesses may be run by younger people. The licensing authority looks to encourage the diversity of local businesses, which would include businesses run by younger entrepreneurs.	Late Night Levy is not intended to benefit or disadvantage people because of their socioeconomic status. It is however acknowledged that there is a continuing trend for increases in business rates and rent costs to all premises and therefore could be adding an additional financial burden to some businesses, which is likely passed on to customers.
Equality information on which above analysis is based	Socio-Economic data on which above analysis is based
Census Data	N/A
Mitigating and/or improvement actions to be taken	
No mitigation is necessary.	

Disability - A person has a disability if s/he has a physical or mental impairment which has a substantial and long-term adverse effect on that person's ability to carry out normal day-to-day activities. Please note that under the PSED due regard includes: Giving due consideration in all relevant areas to "the steps involved in meeting the needs of disabled persons that are different from the needs of persons who are not disabled include, in particular, steps to take account of disabled persons' disabilities." This also includes the need to understand and focus on different needs/impacts arising from different disabilities.	
Potential impacts (positive and negative) of proposed policy review; this also includes needs in relation to each part of the duty.	Potential socio-economic impacts/needs/issues arising from socio-economic disadvantage (positive and negative)
No specific impacts have been identified or raised in relation to this. It is acknowledged that businesses	Late Night Levy is not intended to benefit or disadvantage people

should make 'reasonable adjustments' to accommodate people identifying with having a disability. See Page 83 of the Southwark Statement of Licensing Policy 2021 to 2026. No health impacts are identified	because of their socioeconomic status. It is however acknowledged that there is a continuing trend for increases in business rates and rent costs to all premises and therefore could be adding an additional financial burden to some businesses, which is likely passed on to customers.
Equality information on which above analysis is based	Socio-economic data on which above analysis is based
Census Data	N/A
Mitigating and/or improvement actions to be taken	
N/A	N/A

Gender reassignment: - The process of transitioning from one gender to another. Gender Identity: Gender identity is the personal sense of one's own gender. Gender identity can correlate with a person's assigned sex or can differ from it.	
Potential impacts (positive and negative) of proposed policy review; this also includes needs in relation to each part of the duty.	Potential socio-economic impacts/ needs/issues arising from socio-economic disadvantage (positive and negative)
This LNL review will not benefit or disadvantage non-binary residents or licence holders.	Late Night Levy is not intended to benefit or disadvantage people because of their socioeconomic status. It is however acknowledged that there is a continuing trend for increases in business rates and rent costs to all premises and therefore could be adding an additional financial burden to some businesses, which is likely passed on to customers.
Equality information on which above analysis is based.	Socio-economic data on which above analysis is based
Census	N/A

Mitigating and/or improvement actions to be taken	
N/A	N/A

Marriage and civil partnership – In England and Wales marriage is no longer restricted to a union between a man and a woman but now includes a marriage between a same-sex couples. Same-sex couples can also have their relationships legally recognised as 'civil partnerships'. Civil partners must not be treated less favourably than married couples and must be treated the same as married couples on a wide range of legal matters. (Only to be considered in respect to the need to eliminate discrimination.)	
Potential impacts (positive and negative) of proposed policy review this also includes needs in relation to each part of the duty.	Potential socio-economic impacts/ needs/issues arising from socio-economic disadvantage (positive and negative)
Late Night Levy review will have no impact on marital status and does not treat same sex couples or those in civil partnerships less or more favourably than anyone else. It relates to charges that are brought on all premises operating within certain times of the day.	Late Night Levy is not intended to benefit or disadvantage people because of their socioeconomic status. It is however acknowledged that there is a continuing trend for increases in business rates and rent costs to all premises and therefore could be adding an additional financial burden to some businesses, which is likely passed on to customers.
Equality information on which above analysis is based	Socio-economic data on which above analysis is based
Census Data	N/A
Mitigating or improvement actions to be taken	
N/A	N/A

Pregnancy and maternity - Pregnancy is the condition of being pregnant or expecting a baby. Maternity refers to the period after the birth, and is linked to maternity leave in the employment context. In the non-work context, protection against maternity discrimination is for 26 weeks after giving birth, and this includes treating a woman unfavourably because she is breastfeeding.	
Potential impacts (positive and negative) of proposed policy review; this also includes needs in relation to each part of the duty.	Potential socio-economic impacts/ needs/issues arising from socio-economic disadvantage (positive and negative)

The review of the Late-Night Levy is not able to disadvantage pregnant women or those on maternity leave. No impacts are therefore identified.	Late Night Levy is not intended to benefit or disadvantage people because of their socioeconomic status. It is however acknowledged that there is a continuing trend for increases in business rates and rent costs to all premises and therefore could be adding an additional financial burden to some businesses, which is likely passed on to customers.
Equality information on which above analysis is based	Socio-economic data on which above analysis is based
Census Data	N/A
Mitigating and/or improvement actions to be taken	
N/A	N/A

Race - Refers to the protected characteristic of Race. It refers to a group of people defined by their race, colour, and nationality (including citizenship) ethnic or national origins. N.B. Gypsy, Roma and Traveller are recognised racial groups and their needs should be considered alongside all others.	
Potential impacts (positive and negative) of proposed policy review; this also includes needs in relation to each part of the duty.	Potential socio-economic impacts/ needs/issues arising from socio-economic disadvantage (positive and negative)
The cultural markup of the Borough is wide and varied. The Licensing Authority would want to encourage this diversity. Policy would never be intended to prevent any particular ethnic group from enjoying alcohol, late night refreshment or regulated entertainment. It should however be noted that the Borough is continually changing in terms of regenerating community areas. This has had an effect on local amenities. It has been mooted that some of the late-night economy may face challenges with the continuation of LNL. However, this is a generalisation and not directed at any particular community groups. This is a potential continuation of an existing policy. No negative impacts are identified. Paragraphs 184 to 192 of the Southwark Statement of Licensing Policy 2021 to 2026 states the purpose of the LNL, types of premises exempt under the LNL, reduction that the council may grant to identified premises i.e. those in receipt of small business rate relief which is not based on race.	Late Night Levy is not intended to benefit or disadvantage people because of their socioeconomic status. It is however acknowledged that there is a continuing trend for increases in business rates and rent costs to all premises and therefore could be adding an additional financial burden to some businesses, which is likely passed on to customers.
Equality information on which above analysis is based	Socio-economic data on which above analysis is based
Census Data	N/A
Mitigating and/or improvement actions to be taken	
N/A	N/A

Religion and belief - Religion has the meaning usually given to it but belief includes religious and philosophical beliefs including lack of belief (e.g. Atheism). Generally, a belief should affect your life choices or the way you live for it to be included in the definition.	
Potential impacts (positive and negative) of proposed policy review; this also includes needs in relation to each part of the duty.	Potential socio-economic impacts/ needs/issues arising from socio-economic disadvantage (positive and negative)
LNL review will have no apparent benefit or disadvantage to any particular religion. It should be noted that places of worship are exempt from licensing restrictions, as long as they are not being used for non-religious, commercial purposes.	Late Night Levy is not intended to benefit or disadvantage people because of their socioeconomic status. It is however acknowledged that there is a continuing trend for increases in business rates and rent costs to all premises and therefore could be adding an additional financial burden to some businesses, which is likely passed on to customers.
Equality information on which above analysis is based	Socio-economic data on which above analysis is based
Census Data	N/A
Mitigating and/or improvement actions to be taken	
N/A	N/A

Sex - A man or a woman.	
Potential impacts (positive and negative) of proposed policy review; this also includes needs in relation to each part of the duty.	Potential socio-economic impacts/ needs/issues arising from socio-economic disadvantage (positive and negative)
LNL review will have no benefit or disadvantage to any particular sex.	Late Night Levy is not intended to benefit or disadvantage people because of their socioeconomic status. It is however acknowledged that there is a continuing trend for increases in business rates and rent costs to all premises and therefore could be adding an additional financial burden to some businesses, which is likely passed on to customers.

Equality information on which above analysis is based	Socio-economic data on which above analysis is based
N/A	N/A
Mitigating and/or improvement actions to be taken	
N/A	N/A
Sexual orientation - Whether a person's sexual attraction is towards their own sex, the opposite sex or to both sexes	
Potential impacts (positive and negative) of proposed policy/decision/business plan; this also includes needs in relation to each part of the duty.	Potential socio-economic impacts/ needs/issues arising from socio-economic disadvantage (positive and negative)
Concerns are ongoing on the impacts that face LGBTIQ+ premises remaining open to provide safe spaces for that community. Significant numbers of premises have closed across London in recent years, yet this is likely to be as a result of commercial redevelopment, rather than a direct intention to reduce the number of such venues. Southwark seeks to protect all such venues. LNL review is not intended to prevent any particular group based on LGBTIQ+ self-identification from enjoying alcohol or entertainment at night. Paragraphs 184 to 192 of the Southwark Statement of Licensing Policy 2021 to 2026 states the purpose of the LNL, types of premises exempt under the LNL, reduction that the council may grant to identified premises i.e. those in receipt of small business rate relief which is not based on race.	LNL is not intended to benefit or disadvantage people because of their socioeconomic status. It is however acknowledged that there is a continuing trend for increases in business rates and rent costs to all premises adding an additional financial burden to some businesses, which is likely passed on to customers
Equality information on which above analysis is based	Socio-economic data on which above analysis is based
Census Data	N/A
Mitigating and/or improvement actions to be taken	
N/A	

Human Rights There are 16 rights in the Human Rights Act. Each one is called an Article. They are all taken from the European Convention on Human Rights. The Articles are The right to life, Freedom from torture, inhuman and degrading treatment, Freedom from forced labour , Right to Liberty, Fair trial, Retrospective penalties, Privacy, Freedom of conscience, Freedom of expression, Freedom of assembly, Marriage and family, Freedom from discrimination and the First Protocol
Potential impacts (positive and negative) of proposed policy review.
None identified.
Information on which above analysis is based
Census Data
Mitigating and/or improvement actions to be taken
N/A

Conclusions

Summarise main findings and conclusions of the overall equality impact and needs analysis for this area:

As a result of conducting the Equality Analysis the implementation of the Late Night Levy (LNL) does not appear to have any adverse effects on people who share protected characteristics and no further actions are recommended at this stage.

Section 5: Further equality actions and objectives

5. Further actions			
Based on the initial analysis above, please detail the key mitigating and/or improvement actions to promote equality and tackle inequalities; and any areas identified as requiring more detailed analysis.			
Number	Description of issue	Action	Timeframe
1	None	N/A	N/A

Implementation Equality Impact and Needs Analysis

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