



The Licensing Unit  
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**Metropolitan Police Service**  
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**Our reference:** MD/23/118

**Date:** 21/04/2023

Dear Sir/Madam

**Re:Blame Gloria London Bridge Station 48 Tooley Street SE1 2TF**

Police are in possession of an application from the above for a New Premises Licence for supply of alcohol on/off sales, Regulated Entertainment and Late Night refreshment. The operating schedule describes it as a bar/lounge. The venue is situated in Borough and Bankside district Town Centre area and is also within the Cumulative Impact Zone. The hours requested as per the application are:

Hours premises are open to the public  
Mon-Sun-1000hrs-0115hrs

Regulated Entertainment  
Mon-Sun-1000hrs-0100hrs

Late Night Refreshment  
Mon-Sun-2300hrs-0100hrs

Supply of Alcohol for sale by retail on sales  
Mon-Sun-1000hrs-0030hrs

These terminal hours are outside those suggested in the Southwark statement of licensing policy for such a venue being  
Sun-Thurs-2300hrs  
Fri-Sat-0000hrs

The application states a maximum capacity of 500 plus staff and yet minimal security is offered, it is noted that the application mentions the use of staff to assist in dispersal but no mention of how many staff would carry out this duty . We would also like more information in regards to how many seats are available, what type of

events/entertainment will take place at the venue, will there be any 3<sup>rd</sup> party hire of the venue or externally promoted events and is there a designated dance floor area. The application mentions being aware of the CIZ however The High Court approval of Cumulative impact policies came in Westminster City Council v Middlesex Crown Court. In brief, it stated 'A licence could be refused on the sole ground that the area was already saturated with licensed premises'

The venue has provided a number of control measures with the application and a dispersal policy which we welcome, however we feel that with such a capacity and the hours requested that more robust control measures need to be considered.

Police object to the granting of this licence in its current format as the hours requested are beyond the recommended policy hours. It is also noted that the application requires more information in regards to its operation in order for us to comment further on conditions. Police welcome the opportunity to progress this application

Submitted for your consideration.  
Yours Sincerely

**PC Mark Lynch 2246AS**  
Southwark Police Licensing Unit  
Tel: 0207 232 6756/6639



## **The Locale**

The premises are located in London Bridge Station, a major 24/7 transport hub. There are many commercial premises in the immediate locale including licensed premises. It is also noted that there are also residential dwellings in the locale.

## **This council's Statement of Licensing Policy**

According to sections 6 & 7 of this council's statement of licensing policy 2021 – 2026 (the SoLP), the premises fall within 'London Bridge Major Town Centre Area' and within the Borough and Bankside Cumulative Impact Area.

The following closing times are recommended in section 7 of the SoLP regarding various types of licensed premises located in the London Bridge Major Town Centre Area as follows –

### **Public houses, wine bars or other drinking establishments and bars in other types of premises**

Sunday – Thursday:	23:00
Friday – Saturday:	00:00

The Borough and Bankside Cumulative Impact Area applies to the above types of licensed premises.

A copy of the SoLP is available via:

<https://www.southwark.gov.uk/assets/attach/7473/Statement-of-Licensing-Policy-2021-2026-final.pdf>

## **Our objection**

Our objection relates to the Borough and Bankside Cumulative Impact Area and the promotion of the all of the licensing objectives.

We say that a bar operating as proposed in the application will add to the negative cumulative impact of licensed premises in the Borough and Bankside Cumulative Impact Area and would likely have a negative impact on the quality of life for local residents.

A bar style operation has high risk factors regarding the promotion of the licensing objectives, which is why such types of premises are subject to the Borough and Bankside Cumulative Impact Area.

Even when bars are operated to high standards, and in compliance with the premises licences issued in respect of them internally, they often attract crime, disorder, anti-social behavior and nuisance to the areas where they are located in. Even if the applicant is able to operate the premises well under the proposed variation, they will not be able to avoid these problems being caused in the locale – again, this is why such premises are subject to the Borough and Bankside Cumulative Impact Area.

Paragraph 131 of the SoLP states - "*Applications made within specified Cumulative Impact Areas (CIAs) are deemed likely to add to the potential impact the policy is intended to avoid. There is therefore an automatic presumption that such applications will be refused, however each application will be judged on its own merits.*"

Paragraph 132 of the SoLP states that - "*It is normally the case that a representation citing a relevant CIA will have to be determined at a Licensing Sub-Committee hearing.*"

We further note that section 136 of the SoLP states - *“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.”*

In our opinion, the applicant has not demonstrated that the application will not, if granted, further contribute to the negative local cumulative impact on any one or more of the licensing objectives.

We also refer to R (on the application of Westminster City Council) -v- Middlesex Crown Court [2002] EWHC 1104 in which HHJ Baker adjudicated *“Notwithstanding the applicant being a fit and proper person and the premises would be well run a licence could be refused on the sole ground that the area was already saturated with licence premises....and the cumulative effect of the existing premises was impacting adversely on the area to an unacceptable level”*.

This application can be refused on the sole basis that it is subject to a cumulative impact area.

We therefore refer this application to the council’s Licensing Sub-Committee and recommend that the application be refused.

We note that it is correct that, as asserted by the applicant, a premises licence was previously issued in respect of the premises (licence number 871195). This licence lapsed permanently because the licence holding company went into liquidation, and the licence was not transferred to another party within the permitted 28 day ‘interim period’ during which licences lapsed due to liquidation can be transferred to another party.

The previous premises licence (licence number 871195) permitted licensable activities as follows –

Recorded music (indoors) -

**Friday and Saturday: 23:00 – 00:00 (midnight)**

Late night refreshment (indoors) -

**Friday and Saturday: 23:00 – 00:00**

The sale of alcohol to be consumed on and off the premises -

**Monday - Thursday: 10:00 – 23:00**

**Friday and Saturday: 10:00 – 00:00**

**Sunday: 11:00 – 22:30**

Opening hours -

**Monday - Thursday: 08:00 – 23:00**

**Friday and Saturday: 08:00 – 00:30**

**Sunday: 10:00 – 22:30**

In part 'M' of the application, the applicant has proposed various licence conditions to address the licensing objectives. These conditions were taken from the previous licence (licence number 871195). We note that the application for licence number 871195 was determined by this council's licensing sub-committee.

Notwithstanding our prior comments regarding cumulative impact, we contend that, if the applicant amended the proposed operating hours to those of the previous premises licence, amended or replaced various conditions offered in the application, and finally, included new conditions in the operating schedule of the application, then cumulative impact will have been sufficiently addressed and the application would also be congruent with our current SoLP.

We recommend the following -

Replace condition 1 regarding SIA at the premises with the following conditions:

- That a minimum of three (3) SIA registered door supervisors will be employed at the premises at all times after 21:00 hours on Friday & Saturday. They will be employed to control entry to the premises, to deal with the searching / scanning of customers, to deal with any anti-social or disorderly behaviour at the premises, to de-escalate confrontations, to assist with emergency escape from the premises, to deal with the ejection of people from the premises, to assist management in liaising with the police regarding instances of crime and to assist with ensuring that the premises' dispersal policy is adhered to. When deployed, they shall remain at the premises at least until close and all patrons have vacated the premises. The door supervisors shall be easily identifiable.
- That when SIA staff are employed at the premises all such staff shall be supplied with, shall be trained in the use of and shall use at all times the premises are in operation 2-way radios ('walkie-talkies') to aid in the safe operation of the premises.

Replace condition 2 regarding staff training with the following condition:

- That all staff shall be trained in their responsibilities under the Licensing Act 2003, the promotion of the licensing objectives and the terms and conditions of this licence. Records pertaining to such training ('the staff training logs') shall be kept at the premises, shall be updated every 6 months and shall be made immediately available to responsible authority officers on request. The training logs shall include the trainee's name (in block capitals), the trainer's name (in block capitals), the signature of the trainee, the signature of the trainer, the date(s) of training and a declaration that the training has been received and understood by the trainee.

Replace conditions 5 - 7 regarding CCTV with the following conditions:

- That a digital CCTV system shall be installed at the premises, shall be maintained in full working order and shall be continually recording at all times that the premises are in use. The CCTV system must be capable of capturing a clear facial image of every person who enters the premises. The CCTV system shall be correctly time and date stamped. The CCTV system shall cover all interior and exterior areas of the premises, including the frontage of the premises, and shall collect clearly defined / focused footage.
- That all CCTV footage shall be kept for a period of thirty one (31) days and shall be made immediately available to council and / or police officers on request.

- That a member of staff shall be on duty at all times that the premises are in use, who is trained in the use of the CCTV system and who is able to view, and download to a removable storage device, CCTV footage at the immediate request of police and / or council officers.

Replace condition 8 regarding the accommodation limit with the following condition:

- That the maximum number of people permitted on the premises at any one time (the 'accommodation limit') is **500** people (excluding staff). The accommodation limit shall be known by all staff and shall not be exceeded at any time.

Replace condition 11 regarding the dispersal policy with the following condition:

- That a dispersal policy to assist with patrons leaving the premises in an orderly and safe manner shall be devised and maintained regarding the premises. A copy of the dispersal policy shall be accessible at the premises at all times that the premises are in operation. The policy should include (but not necessarily be limited to) the following:
  - I. •Details as to how customer / staff egress at the premises shall be managed to minimise causing nuisance.
  - II. •Details of public transport in the vicinity and how customers will be advised in respect of it.
  - III. •Details of the management of taxis to and from the premises.
  - IV. •Details of the management of any 'winding down' period at the premises.
  - V. •Details of the use of security and stewarding in respect of managing customer dispersal from the premises.
  - VI. •Details of any cloakroom facility at the premises and how it is managed.
  - VII. •Details of road safety in respect of customers leaving the premises.
  - VIII. •Details of the management of ejections from the premises.
  - IX. •Details of how refuse / waste in the local vicinity arising through the operation of the premises will be cleared up (e.g. flyer clean up, post event clean up).

All relevant staff employed at the premises shall be trained in the latest version of the dispersal policy. Details of such training, including the printed name(s) of the trainee(s) and the date(s) that the training was given, shall be recorded in the staff training logs at the premises. The dispersal policy shall be made immediately available to responsible authority officers on request.

Replace condition 12 regarding the incident log with the following condition:

- That an incident log shall be kept at the premises to record details of any of the following occurrences at the premises:
  - i. Instances of anti-social or disorderly behaviour
  - ii. Calls to the police
  - iii. Any complaints received
  - iv. Ejections of people from the premises
  - v. Visits to the premises by the local authority or emergency services
  - vi. Any malfunction in respect of the CCTV system
  - vii. All crimes reported
  - viii. Any other relevant incidents

The incident log shall record the time, date, location in the premises and description of each incident, the printed and, if possible, signed name of the person reporting the incident and any action taken in respect of the incident. The incident log shall be available / be accessible at the premises at all times that the premises are in use, and shall be made immediately available to responsible authority officers on request. All relevant staff employed at the premises shall be trained in the use of the incident log.

Details of such training, including the printed name(s) of the trainee(s) and the date(s) that the training was given, shall be recorded in the staff training logs at the premises.

Replace condition 13 regarding external monitoring with the following condition:

- That the premises' management shall regularly monitor outside the premises and take all necessary steps to ensure that noise from patrons or premises operation does not cause disturbance or public nuisance. A log of such monitoring including the printed name of the person who undertook the monitoring, the date & time of the monitoring and any observations or actions taken subsequent to the monitoring shall be kept at the premises and be made immediately available to council or police officers on request.

Replace condition 14 regarding signage with the following condition:

- That clearly legible signage shall be prominently displayed where it can easily be seen and read by customers, at all exits from the premises and in any external areas, requesting to the effect that customers leave the premises and locale in a quiet and orderly manner with respect to local residents. Such signage shall be kept free from obstructions at all times.

Replace condition 15 regarding challenge 25 with the following conditions -

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

All other conditions offered in the application are to remain as is.



We also recommend that the following conditions are included in the application's operating schedule -

- That deliveries to and from the premises shall only take place between 07:00 hours and 17:00 hours.
- That external waste, recycling or waste glass / bottle depositing shall only take place between 07:00 hours and 17:00 hours. At all other times waste, recycling or waste glass / bottles shall be kept on the premises until they are due to be collected.
- That staff shall be trained to arrive at, conduct themselves at the premises at all times, and leave the premises in an orderly manner, with particular care taken when staff close the premises at the end of trade on each day. The details of such training, including the printed name(s) of the trainee(s) and the date(s) that the training was given, shall be recorded in the staff training logs at the premises.
- That no deliveries of alcohol shall take place from the premises.
- That a zero tolerance policy to illegal drug use will be implemented and maintained at the premises. All relevant staff shall be trained in respect of the premises' drug policy. The details of such training, including the printed name(s) of the trainee(s) and the date(s) that the training was given, shall be recorded in the staff training logs at the premises.
- That an entry policy will be devised and maintained at the premises. A copy of the entry policy shall be kept at the premises with the premises licence and shall be made immediately available for inspection to responsible authority officers on request. The entry policy shall cover (but not necessarily be limited to):
  - I. Safe customer entry to the premises,
  - II. If / when applicable searching / scanning of attendees,
  - III. The barring of customer entry to the premises for any reason,
  - IV. Restricted items (e.g. weapons / drugs or any other items restricted by the licensee),
  - V. Pre-opening safety checks of the premises,
  - VI. Dealing with overcrowding and / or crowd surges
  - VII. Dealing with suspect packagesAll relevant staff shall be trained in the implementation of the latest version of the entry policy. The details of such training, including the printed name(s) of the trainee(s) and the date(s) that the training was given, shall be recorded in the staff training logs at the premises.
- That if a Pubwatch scheme exists in respect of the local area, then the licensee / management will join and participate in the Pubwatch scheme.
- That children / persons under 18 years old shall not be permitted at the premises unless accompanied by a responsible adult.
- That a sound limiting device (or similar equipment) shall be installed at the premises, be maintained in full working order and be in use at all times that the premises are in operation under this licence. All amplification equipment, entertainment devices and amplified instruments used in the provision of licensable activities at the premises shall be routed through the sound limiting device (or similar equipment), which shall be calibrated so that the sound level of amplified sound at the premises does not cause a statutory or public nuisance. Only management staff shall have access to the sound

limiting device (or similar equipment) and shall be able to demonstrate that it is in use at the immediate request of responsible authority officers.

- That only management staff shall have access to any amplification equipment at the premises, and only management staff shall be permitted to change any control settings on said equipment.

We welcome discussion with the applicant on any of the matters above; however should the applicant agree to all of our proposed amendments to the application then we will withdraw this representation.

Yours sincerely,

**Wesley McArthur**  
Principal Enforcement Officer