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**Our reference:** MD/23/115

**Date:** 13/04/2023

Dear Sir/Madam

**Re: Big Belly Comedy Club**  
**Unit 6 & Unit 7, Southbank Central Development**  
**Stamford Street**  
**London**  
**SE1 9LS**

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

Hours premises are open to the public  
Sun-Thurs-0800hrs-0000hrs  
Fri-Sat-0900hrs-0100hrs

Regulated Entertainment  
Sun-Thurs-0800hrs-0000hrs  
Fri-Sat-0900hrs-0100hrs

Late Night Refreshment  
Sun-Thurs-2300hrs-0000hrs  
Fri-Sat-2300hrs-0100hrs

Supply of Alcohol for sale by retail  
Sun-Thurs-0800hrs-0000hrs  
Fri-Sat-0900hrs-0100hrs

The premises are also situated in the Borough and Bankside Cumulative impact Zone (CIZ) as designated by Southwark Council. 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 applicant has provided some control measures to address all of the licensing objectives although in their current form not all are enforceable and we would like to see more robust measures as the venue sits within the cumulative impact zone. It should be noted that The Home office guidance issued under Sec 182 of the licensing Act 2003 'General principles' state that it is important in setting the parameters within which the premises may operate. Conditions precise and enforceable.

Police object to the granting of this licence in its current form as the control measures offered do not address the licensing objectives sufficiently. 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

## Conditions agreed between the Police and the Applicant – Big Belly Comedy Club

1. That a CCTV system shall be installed and maintained in full working order. The CCTV system will record footage of evidential quality in all lighting conditions and should be able to capture a clear facial image of all persons that enter the venue. All public areas will be covered by the CCTV system including the bar and smoking areas. The premises shall not be open at any time when the CCTV is not operating correctly.
2. That there shall be at least one member of staff on duty at all times the premises are in operation who is trained and proficient in the operation of the CCTV system and who is capable of operating and retrieving footage at the request of police, council or other authorised officers.
3. All CCTV footage shall be kept for a period of thirty one (31) days and shall be made immediately available for inspection to officers of the Police and the Council on request.
4. The written dispersal policy shall be kept at the premises with the licence and made available for inspection by authorised council officers or the police. All relevant staff shall be trained in the implementation of the dispersal policy.
5. There shall be no new entry or re-entry of patrons after 2300hrs Sunday to Thursday and 0000hrs Friday to Saturday with the exception of those that temporarily leave to smoke in the designated area, or those with tickets that are late arriving for the final show of the day.
6. That no outdoor area shall be used after 2200hours with the exception of those that temporarily leave to smoke, this shall be in a clearly designated area that is monitored by staff to ensure that the limit of 20 is adhered to.
7. Clear legible signage shall be prominently displayed where it can be easily seen and read, requesting that 'off sales' of alcohol are not be opened and consumed in the vicinity of the premises
8. There shall be a minimum of 2 SIA door supervisors employed on a Friday and Saturday from 1800hrs until all patrons have vacated the venue and its adjacent roads.
9. The Licensee shall risk assess the requirement for additional SIA on any day and be responsible for the implementation of additional SIA. This risk assessment shall be recorded in written form and made available for inspection by authorised officers and police.
10. That admission to recorded music led events will be by advance ticket holders only in which the names and addresses of attendees shall be recorded by the venue and made available to Authorised council officers

and police upon request, with the exception of recorded music that is in addition to the main comedy event.

11. That where recorded music is not ancillary to the main event, hosted the venue will require a minimum of 4 SIA Security staff and a body and bag search policy. All security staff are to wear body worn video cameras and be in contact with the venue via radios, there will be a minimum of ONE female security staff. The search policy will include the search of all customers, DJ's and associated staff and their equipment.
12. All 'off sales' of alcohol shall be provided in sealed containers and taken away from the premises with the exception of the seated outdoor areas of the venue.
13. There shall be no off sales after midnight.
14. Clearly legible signage shall be prominently displayed at all exits where it can easily be seen and read, requesting that customers leave the premises in a quiet and orderly manner that is respectful to neighbours.
15. The venue shall monitor the outside areas to ensure that patrons cause no nuisance to their neighbours.
16. An event management plan shall be developed by the venue and a copy of this shall be held at the venue and made available for inspection upon request by authorised council officers and police.
17. The venue shall have ultimate responsibility for risk assessing all events held and a record of these assessments for each event shall be kept and made available upon request by Authorised council officers and police.
18. That licensable activities shall cease 30 minutes before the terminal hour.
19. The venue shall support "Ask for Angela" or another similar safety initiative and posters shall be displayed on the premises.
20. The licence holder shall ensure that any queue to enter the premises which forms outside the premises is orderly and supervised by door staff so as to ensure that there is no public nuisance or obstruction is caused.
21. A record shall be kept detailing all refused sales of alcohol. The record should include the date and time of the refused sale and the name of the member of staff who refused the sale. The record shall be available for inspection at the premises by the police or an authorised officer of the City Council at all times whilst the premises is open.
22. An incident log shall be kept at the premises, and made available on request to Police and council officers. It must be completed within 24 hours of the incident and will record the following:

- a) all crimes reported to the venue
- b) all ejections of patrons
- c) any complaints received concerning crime and disorder
- d) any incidents of disorder
- e) all seizures of drugs or offensive weapons
- f) any faults in the CCTV system, searching equipment or scanning equipment
- g) any refusal of the sale of alcohol
- h) any visit by a relevant authority or emergency service