



The Licensing Unit  
 Floor 3  
 160 Tooley Street  
 London  
 SE1 2QH

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

Tel: 020 7232 6756

Email: SouthwarkLicensing@met.police.uk

**Our reference:** MD/21/477/24

**Date:** 29/05/2024

Dear Sir/Madam

**Re:- Elflock Limited, Tiloli 3 Lordship Lane SE22 8EW**

Police are in possession of an application from the above for a new premises licence. The applicant describes the premises as a Bar/Restaurant. The following hours of operation have been applied for.

Open hours to public  
 Sun-Thurs-0900hrs-0030hrs  
 Fri-Sat-0900hrs-0130hrs

Supply of Alcohol on sales  
 Sun-Thurs-1000hrs-0000hrs  
 Fri-Sat-1000hrs-0100hrs

Late Night Refreshment  
 Sun-Thurs-2300hrs-0030hrs  
 Fri-Sat-2300hrs-0130hrs

Recorded Music  
 Sun-Thurs-1200hrs-0000hrs  
 Fri-Sat-1200hrs-0100hrs

Live Music  
 Sun-Thurs-1200hrs-0000hrs  
 Fri-Sat-1200hrs-0100hrs

The premises is located in a district town centre, under the Southwark Statement of Licensing Policy 2021 - 2026, the following closing times are recommended as appropriate within this area for the categories of premises indicated

**Restaurant** : Closing time for restaurants and cafes: Sunday to Thursday is 00:00hrs and for Friday and Saturday is 01:00hrs

**Public\_house** : Closing time for public houses, wine bars or other drinking establishments: Sunday to Thursday is 23:00 hours and for Friday and Saturday 00:00 hours

The general description of the premises is that of a Bar/Restaurant, I note that the operating schedule does not provide control measures that would restrict the use of the premises to that of a restaurant. The hours to consider for this application would therefore be those for a Bar or other drinking establishment.

The applicant should consider additional control measures if they intend to operate predominantly as a restaurant, or consider reducing the hours of operation to those appropriate for a Bar in this area.

The following control measures, a number of which have already been provided by the applicant would be sufficient to promote the licensing objectives for a restaurant. Additional control measures highlighted in red would be more appropriate for a Bar.

1. 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 in all lighting conditions. The CCTV system shall be correctly time and date stamped at all times. 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 Police and responsible authority officers on request.
2. 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 responsible authority officers.
3. That clearly legible signage shall be prominently displayed where it can easily be seen and read by customers advising to the effect that CCTV is in operation at the premises. The signage shall be kept free from obstructions at all times.
4. That all relevant 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 date(s) of training and a declaration that the training has been received and understood by the trainee. If the staff training logs are a paper hardcopy then the signature of the trainee, the signature of the trainer shall be included. That all Digital records of training and/or logs shall be made immediately available to Police and responsible authority officers on request.
5. Clearly legible signs shall be prominently displayed where they can easily be seen and read by customers at all exits from the premises, requesting that (A) Requesting people leave the premises in a quiet and orderly manner so as not to disturb local residents.

(B) Customers do not consume alcoholic drinks bought at the premises in the vicinity of the premises. Such signs shall be maintained free from obstruction when the premises are in use.

6. An incident book/incident recording system 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 or Violence
- (ii) Calls to the police or fire brigade
- (iii) Abuse of staff and/or customers
- (iv) Ejections of people from the premises
- (v) Visits to the premises by the local authority, police or fire brigade
- (vi) Refused sales of alcohol
- (vii) Any malfunction in respect of the CCTV system
- (viii) Any other relevant incidents

The incident book/incident recording system shall record the time, date, location, and description of each incident as well as the printed name of the person reporting the incident and any action taken in respect of the incident. The incident book/incident recording system shall be available and accessible at the premises at all times that the premises are in use in accordance with this licence and shall be made available immediately to Police and responsible authority officers upon request. A record of the preceding 12 months' incidents shall be available at the premises at any time. That all Digital records of training and/or logs shall be made immediately available to Police and responsible authority officers on request.

8. Premises must have a welfare and vulnerability policy and all staff must receive this training. All new staff must receive this training before starting their role and all staff must have refresher training every 12 months. All training must be recorded and these records must be available on immediate request by responsible authority officers. That all Digital records of training and/or logs shall be made immediately available to Police and responsible authority officers on request.

9. The venue shall support "Ask for Angela" or another similar safety initiative and posters shall be displayed on the premises. All staff shall be trained in "Ask Angela" or a similar safety initiative and a record of this training shall be kept on the premises and made available for inspection immediately to responsible authority officers upon request. That all Digital records of training and/or logs shall be made immediately available to Police and responsible authority officers on request.

10. 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.<sup>11</sup>
- 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 road safety in respect of customers leaving the premises.

VII. Details of the management of ejections from the premises.

VIII. Details as to how any physical altercations at the premises are to be managed

X. 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).

11. A minimum of one (1) SIA registered door supervisor will be employed at the premises on any day when the terminal hour is beyond midnight. The Sia Registered door supervisor shall be employed from 2100hrs until all patrons have vacated the premises and the vicinity of the premises

12. That SIA registered door supervisors 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 deescalate confrontations, to assist with emergency escape from the premises, to deal with the ejection of people from the premises and 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. At the close of business they shall proactively encouraging patrons to vacate the premises. The door supervisors shall be easily identifiable.

13. All off sales of alcohol shall be in sealed containers for consumption away from the premises.

14. The external area of the premises will not be used for any trading activities after 2200 on any day, this will include the consumption of any beverages or food.

15. The supply of alcohol on the premises shall only be to patrons taking a substantial table meal there and for consumption by such persons as ancillary to their meal and will be by way of waiter/waitress service only.

The Metropolitan Police object would be asking the licensing sub committee to refuse this application as it stands. Additional consideration is required as detailed above to fully promote the licensing objectives. Police welcome the opportunity to conciliate the application.

Submitted for your consideration.

Yours Sincerely

PC Ian Clements 2362AS

Licensing Officer  
Southwark Police Licensing

**From:** Ian.Clements@met.police.uk <Ian.Clements@met.police.uk>  
**Sent:** Friday, June 7, 2024 1:18 PM  
**To:** [REDACTED] Franklin, David <David.Franklin@SOUTHWARK.GOV.UK>  
**Cc:** Regen, Licensing <Licensing.Regen@southwark.gov.uk>  
**Subject:** RE: Tiloli 3 Lordship Lane

Dear Anthony

Thank you once again for the positive response. As all conditions have been accepted save for the amendments to condition 15 as detailed below, I can now withdraw my representation.

15. The supply of alcohol on the premises shall largely be to patrons taking a substantial table meal there and for consumption by such persons as ancillary to their meal by way of waiter/waitress service only, however a total of up to 60 vertical drinkers, seated or standing, served directly from the bar will be permitted.

Kind Regards

Ian

**From:** [REDACTED]  
**Sent:** 07 June 2024 12:21  
**To:** Clements Ian J - AS-CU <[Ian.Clements@met.police.uk](mailto:Ian.Clements@met.police.uk)>  
**Subject:** RE: Tiloli 3 Lordship Lane

Dear Ian,  
Good afternoon.

Thank you for coming back to me so quickly and for your assistance with this application, and absolutely, conditions 11 & 12 are agreed.  
Kind regards, Anthony

**From:** [Ian.Clements@met.police.uk](mailto:Ian.Clements@met.police.uk) <[Ian.Clements@met.police.uk](mailto:Ian.Clements@met.police.uk)>  
**Sent:** Friday, June 7, 2024 11:42 AM  
**To:** [REDACTED]  
**Subject:** RE: Tiloli 3 Lordship Lane

Dear Anthony

Thank you for this response, with regard to condition 15 I am happy to run with that on the basis the intention is to be more of a food led premises.

Before I send this off to the local authority licensing team I wanted to confirm your position on condition 11&12 in relation to the employment of SIA. Your email accepts all the conditions proposed in my email.

Kind Regards

Ian

**Ian Clements 2362AS** | Police Licensing Officer

Central South BCU – Southwark | **Night Time Economy & Licensing**

*Working for a safer Southwark*

Email: [ian.clements@met.police.uk](mailto:ian.clements@met.police.uk)  
Address: Southwark Police Station

**From:** [REDACTED]  
**Sent:** 06 June 2024 19:01  
**To:** Clements Ian J - AS-CU <[ian.Clements@met.police.uk](mailto:ian.Clements@met.police.uk)>  
**Subject:** RE: Tiloli 3 Lordship Lane

Dear Ian,  
Good afternoon.

My apologies for the delayed email, I was waiting for a colleague to confirm some details.

Thank you again for your time on the phone yesterday and as discussed we are content to adopt all of the conditions that you have requested with the only change being to Condition 15 which we would ask is altered to that below:

15. The supply of alcohol on the premises shall largely be to patrons taking a substantial table meal there and for consumption by such persons as ancillary to their meal by way of waiter/waitress service only, however a total of up to 60 vertical drinkers, seated or standing, served directly from the bar will be permitted.

The total maximum capacity for the venue would be approximately 190 and so 60 patrons would constitute 32% of the total, which would ensure that the venue is largely dining based (which is the intention), but with the flexibility to supplement revenues with purely drink sales to ensure economic viability, this element being more akin to the old style wine bar offer.

I trust that this is an acceptable approach to meeting your objectives so that the objection may be withdrawn, however please do not hesitate to come back to me if you require any further detail. We have been at the adjacent EDT for over 25 years now and so this offer is designed to complement our traditional public house next door with a café/restaurant/bar offer, one somewhat more premium, food and wine based, and for a slightly older audience.

Thank you for your assistance in this matter.  
Kind regards, Anthony

**From:** Binya, Raymond <Raymond.Binya@southwark.gov.uk>  
**Sent:** Monday, June 10, 2024 12:14 PM  
**To:** Regen, Licensing <Licensing.Regen@southwark.gov.uk>  
**Subject:** Application for a new premises licence under the Licensing Act 2003 for Tiloli 3 Lordship Lane, London SE22 8EWour ref A21050

Dear Licencing Team,

RE: New premises application to be granted under the Licensing Act 2003.

**Application reference number:** 883038

**Address:** Tiloli  
3 Lordship Lane  
London  
SE22 8EW

#### **Live Music**

<b>Day</b>	<b>Start</b>	<b>Finish</b>
Mon	12:00	0:00
Tues	12:00	0:00
Wed	12:00	0:00
Thur	12:00	0:00
Fri	12:00	01:00
Sat	12:00	01:00
Sun	12:00	23:30

#### **Recorded Music**

<b>Day</b>	<b>Start</b>	<b>Finish</b>
Mon	12:00	00:00
Tues	12:00	00:00
Wed	12:00	00:00
Thur	12:00	00:00
Fri	12:00	01:00
Sat	12:00	01:00
Sun	12:00	00:00

#### **Late night refreshment**

<b>Day</b>	<b>Start</b>	<b>Finish</b>
Mon	23:00	00:30
Tues	23:00	00:30
Wed	23:00	00:30
Thur	23:00	00:30
Fri	23:00	01:30
Sat	11:00	01:30
Sun	23:00	00:30

#### **Supply of alcohol**

<b>Day</b>	<b>Start</b>	<b>Finish</b>
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Mon	10:00	00:00
Tues	10:00	00:00
Wed	10:00	00:00
Thur	10:00	00:00
Fri	10:00	01:00
Sat	10:00	01:00
Sun	10:00	00:00

Premises has been described as Restaurant/Bar.

On behalf of the Environmental Protection Team (EPT), I wish to make representation to this application on the grounds:

**a) Compliance with Licensing Policy**

The proposed licensable activities are outside suggested closing times for licensed premises of this type within the this area as stated within Southwark Statement of Licensing Policy 2021-2026.

- **Takeaway** : Closing time for Take-away establishment : Sunday to Thursday is 00:00 hours and for Friday and Saturday is 01:00 hours

**b) Public nuisance and impact to neighbouring properties**

The application site comprises of the ground floor of a two-storey property. There floors above the premises are in residential occupation. We are concerned they are likely to be affected by premises running in late hours as applied and premises structural integrity to allow the proposed activities to run without causing nuisance to the occupants of the above floors and neighbouring residents.

In addition, assuming that they would be a stage for live music, however, the submitted plan does not show where the live music will be performed.

However, if the committee is minded to granting this application, we recommend the following conditions in addition to those proposed by the applicants:

- All external plant required for the operation of the premises (air handling plant, condensers, kitchen extraction systems, etc.) shall be designed, installed and maintained to ensure that noise output from the external plant does not cause a public nuisance or intrude inside the nearest, or most exposed, noise sensitive premises.
- Any kitchen extraction system required for the operation of the premises shall be installed with an appropriate discharge location (i.e. eaves height) and with adequate odour control filters installed and maintained to ensure that odour emissions do not cause a public nuisance or intrude inside in the nearest or most exposed sensitive premises



- All external doors and doors to noise lobbies used by patrons to enter the premises shall have acoustic seals and brushes and self-closers (in accordance with BS 6459 Pt. 1 1984) fitted to those doors.
- All speakers for the broadcast of sound within the premises shall be isolated from the structure of the premises by anti-vibration mountings or mats.
- During any licensed entertainment on the premises, all doors and windows shall remain closed (except for access or egress).
- Any background music played shall remain at a volume that permits normal conversation and the volume control of any music shall be behind the bar/counter and in the full control of staff at all times.
- Amplified music, song or speech shall not be broadcast in external areas at any time.
- No drinks or glassware are permitted outside at any time.
- External waste handling, collections, deliveries and the cleaning of external areas shall only occur between the hours of 08.00hrs and 20.00hrs.
- Clearly legible signage will be prominently displayed at all patron exits, where it can easily be seen and read, requesting that patrons leave the premises in a quiet and orderly manner that is respectful to neighbours.
- Clearly legible signage will be prominently displayed at all patron exits, where it can easily be seen and read, requesting to the effect that patrons do not take drinks outside.
- No external areas of the premises shall be used for the purposes of licensed entertainment.

Informative: In addition, Planning records show that the premises has always been operating a retail unit (A1), we therefore advise the applicants to seek advice from Planning whether permission is required to change to proposed uses.

Kind Regards

**Raymond Binya**  
**Principal Environmental Protection Officer**  
 Environmental Protection Team  
 Tel: 020 7525 4809

<b>To:</b> Licensing Unit	<b>From:</b> Wesley McArthur <a href="mailto:wesley.mcarthur@southwark.gov.uk">wesley.mcarthur@southwark.gov.uk</a> 020 7525 5779 (on behalf of the Licensing Unit in its role as a responsible authority)	<b>Date:</b> 11 June 2024
<b>Subject:</b>	Representation	
<b>Act:</b>	The Licensing Act 2003 (the Act)	
<b>Premises:</b>	Tiloli, 3 Lordship Lane, London, SE22 8EW	
<b>Application number:</b>	<b>883038</b>	
<b>Location ID:</b>	201509	<b>Ward:</b> Goose Green

We object to the grant of an application for a premises licence, submitted by Elflock Limited under The Licensing Act 2003 (the Act), in respect of the premises known as Tiloli, 3 Lordship Lane, London, SE22 8EW.

### 1. The application

The application is to allow for the provision of the following licensable activities and opening hours:

#### Films (indoors) –

- **Monday - Sunday: 12:00 – 23:00**

#### Live music (indoors) –

- **Sunday - Thursday: 12:00 – 00:00 (midnight)**
- **Friday & Saturday: 12:00 – 01:00**

**Live music to finish at 01:30 on New Year's Eve**

#### Recorded music (indoors) –

- **Sunday - Thursday: 12:00 – 00:00**
- **Friday & Saturday: 12:00 – 01:00**

**An additional hour on the Friday, Saturday and Sunday of bank holiday weekends. An additional 2 hours on Christmas Eve and New Year's Eve.**

#### Late night refreshment (indoors) –

- **Sunday - Thursday: 12:00 – 00:30**
- **Friday & Saturday: 12:00 – 01:30**

**An additional hour on the Friday, Saturday and Sunday of bank holiday weekends. An additional 2 hours on Christmas Eve and New Year's Eve.**

#### The sale of alcohol for consumption on and off the premises the premises as follows –

- **Sunday - Thursday: 12:00 – 00:00**
- **Friday & Saturday: 12:00 – 01:00**

**An additional hour on the Friday, Saturday and Sunday of bank holiday weekends. An additional 2 hours on Christmas Eve and New Year's Eve.**

The proposed opening hours of the premises are –

- **Sunday - Thursday:** 09:00 – 00:30
- **Friday & Saturday:** 09:00 – 01:30

**An additional hour on the Friday, Saturday and Sunday of bank holiday weekends. An additional 2 hours on Christmas Eve and New Year's Eve.**

The premises are described in the application as (verbatim):

“Bar/restaurant”

## **2. The Locale**

The premises are located to the North of Lordship Lane in Lordship Lane District Town Centre. Much of Lordship Lane comprises a busy and vibrant town centre area with many shops, bars, restaurants and pubs as well as many other types of commercial premises.

The roads off Lordship Lane are highly residential and quiet with low levels of vehicular or pedestrian through traffic. Lordship Lane itself is a busy thoroughfare both in the day and late at night. Various bus routes operate along Lordship Lane.

There are residential dwellings at first floor level and above in some adjacent properties and opposite the premises.

Lordship Lane has long been an area with a significant offering of bars, pubs and restaurants.

**Figure 1:** View showing the entrance to the premises looking east across Lordship Lane





**Figure 2:** View looking south down Lordship Lane showing the premises and residential properties at first floor level and above and commercial premises at ground floor level



**Figure 3:** View from immediately outside the premises looking due west across Lordship Lane showing residential properties at first floor level and above on Lordship Lane and at ground floor level in Zenoria Street\*, which is directly opposite the premises. Commercial premises are at ground floor level.



\*NB – there is a licensed premises on Zenoria Street

### **3. Statement of Licensing Policy (SoLP)**

According to section 7 of this council's statement of licensing policy 2021 – 2026 (hereafter referred to as 'the SoLP'), the premises fall within Lordship Lane District Town Centre.

A copy of the SoLP is available via:

[Licensing and Gambling Act policy - Southwark Council](#)

The following closing times are recommended in our SoLP in respect of the type of licensed premises located in Lordship Lane District Town Centre as follows –

#### Restaurants and Cafes

**Sunday – Thursday: 00:00**  
**Friday & Saturday: 01:00**

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

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

#### 4. Our objection

##### 4a – operating hours

Our objection relates to the promotion of all of the licensing objectives.

The proposed closing times proposed regarding the premises finish 30 minutes after those proposed in the SoLP for licensed premises in the Lordship Lane District Town Centre.

The operational hours suggested in the SoLP exist to protect residents in the borough.

The operational hours suggested in the SoLP were ratified by councilors at full licensing committee and we suggest that the licensing sub-committee considers this council's own policies, which we say have been applied for good reason.

We further add that full council assembly approved the current version of the SoLP, and have maintained the suggested operating hours four times in a row. This shows that there is still a need for the recommended hours to be given considerable weight in the determination of premises licence applications.

We say that the licensing sub-committee should be gatekeeper of the Statement of Licensing Policy that was, in part, ratified by councillors who form part of this very licensing sub-committee itself.

We therefore contend that the licensing sub-committee must determine this application, rather than the application be granted under '*tacit consent*' – which would mean that the licensing sub-committee would have *no say* in determining an application that runs contrary to the suggested operating hours in this council's SoLP.

Notwithstanding the above, we do note that there are other premises in the locale that have operating hours that exceed those recommended in the SoLP and **that each application must be judged on its own merit.**

We recommend that the closing times of the premises, and the terminal hours regarding regulated entertainment, late night refreshment and *off sales* of alcohol are amended to the following:

**Sunday – Thursday: 00:00**  
**Friday & Saturday: 01:00**

We recommend that the terminal hours regarding the on sale of alcohol are amended to the following:

**Sunday – Thursday: 23:30**  
**Friday & Saturday: 00:30**

We *do not* object to the non-standard timings sought regarding Bank Holidays, Christmas Eve and New Year's Eve.

#### 4b – conditions

In part 'M' of the application, the applicant has proposed various measures to address the licensing objectives. We welcome these measures, but do not feel that they sufficiently address the licensing objectives and say that further conditions are required.

Further to the above, we contend that the conditions proposed need clarification to ensure that they are precise, practicable, enforceable and unambiguous.

Paragraph 1.16 (Licence conditions – general principles) of the Guidance to the Licensing Act 2003 issued by the Secretary of State under section 182 of the Licensing Act 2003 states that conditions –

- “*must be precise and enforceable;*”
- “*must be unambiguous and clear in what they intend to achieve;*”

We therefore recommend that the following measures proposed in part 'M' of the application be replaced as follows, and also that further conditions be included in the application as stated:

#### **C. Public safety**

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

<< The applicant is to provide the accommodation limit – **WM** >>

2. That clearly legible signage shall be displayed where it can easily be seen and read by customers and staff identifying all emergency escape routes and emergency exits at the premises. Such signage shall be kept free from obstructions at all times.
3. That all emergency exits, emergency escape routes and entry / exit doors at the premises shall be kept free from obstructions at all times that the premises are in use.
4. That appropriate first aid equipment / materials shall be kept at the premises in dedicated first aid box / boxes. The first aid box(es) shall be kept easily accessible and unobstructed at all times. All staff shall be made aware of where the first aid boxes are located.

#### **D. The prevention of public nuisance**

5. 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.

6. That clearly legible signage shall be prominently displayed where it can easily be seen and read by customers at all exits requesting to the effect that customers do not consume alcoholic drinks bought at the premises in the vicinity of the premises. Such signage shall be kept free from obstructions at all times.
7. That any 'off sales' of alcohol shall be provided in sealed containers to be taken away from the premises.
8. That only the licensee, designated premises supervisor (DPS), or any person nominated in writing by the licensee or DPS, shall have access to any amplification equipment at the premises, and only such staff shall be permitted to change any control settings on said equipment.

That the condition stating

*"A sound limiting device will be installed and will be used at all times that relevant regulated entertainment is taking place and this will be set and sealed at a level approved by an acoustic consultant with only the premises license holder or a nominated deputy and the designated premises supervisor will have access to the sound limiting device."*

be replaced with the following condition -

9. 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 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 the licensee, designated premises supervisor (DPS), or any person nominated in writing by the licensee or DPS, 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.
10. That external doors at the premises shall be kept closed except for immediate, and emergency, access and egress to and from the premises when entertainment is being provided at the premises.
11. That any openable windows at the premises shall be kept closed at all times that when entertainment is being provided at the premises.
12. That any advertising, marketing or media relating to the premises (including websites and social media) will advise customers that there is no readily available parking in the vicinity of the premises, shall list public transport options available in the vicinity and shall advise customers to refrain from driving to the premises.

#### **E. The protection of children from harm**

We request that section E of the operating schedule in part 'M' of the application form be replaced *in its entirety* with the following conditions –

13. That a challenge 25 scheme shall be maintained requiring that staff selling or delivering 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.

14. 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 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 and shall be made immediately available for inspection at the premises to council and / or police officers on request.
15. 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.
16. 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.
17. That no deliveries from the premises of alcohol shall be permitted.
18. That any person under 16 years old must be accompanied on the premises by a responsible adult at all times.
19. That when films with a rating above PG are shown, only persons who are, at a minimum the same age as the film's rating, shall be permitted entry to the premises.

If the applicant agrees to the above amendments to the application then we will withdraw this representation.

We advise the applicant to contact us as soon as possible.

Yours sincerely,

**Wesley McArthur**  
Principal Enforcement Officer