

**From:** O Daly [REDACTED]

**Sent:** Friday, October 4, 2024 9:24 PM

**To:** McArthur, Wesley [REDACTED]

**Cc:** Heron, Andrew [REDACTED]

**Subject:** Re: Application to vary a premises licence: Bubble Bubble & Bar, 194 Old Kent Road, London, SE1 5TY (our ref': L1U 884003) - Loc ID: 199285 - Faraday ward

I hope, but unfortunately don't believe, that this is a joke?

With five hours left of a twenty eight day consultation period you've submitted a non-conciliatory representation against the application stating it must go to committee?

There is a consultation period for a reason and it's all contained within the word itself. I'm taken aback tbh. Surely if you felt this strongly the representation could have come in at the start of the consultation period.

With minutes ticking down, hopefully you'll read this. The applicant remains willing to amend the operating schedule and is open to reducing hours on certain days with possible exceptions for special occasions such as Chinese New Year.

This is a small pre-booked karaoke bar with a significantly limited capacity, no adverse enforcement history and a focus on entertainment rather than alcohol sales. Culturally the audience is respectful and there have been no know issues around ASB of any groups leaving the premises in its history.

Please consider your representation and whether it is indeed completely adverse to any negotiations.

Kind Regards,

Oisin Daly

Director

**From:** McArthur, Wesley [REDACTED]

**Sent:** Tuesday, October 8, 2024 1:42 PM

**To:** O Daly [REDACTED]

**Cc:** Heron, Andrew [REDACTED]  
[REDACTED]

**Subject:** RE: Application to vary a premises licence: Bubble Bubble & Bar, 194 Old Kent Road, London, SE1 5TY (our ref': L1U 884003) - Loc ID: 199285 - Faraday ward

Dear Mr Daly,

I refer you to our Statement of Licensing Policy (SoLP – copy attached), which it seems, you may not have taken into account.

In particular I draw your attention to section 7 of the SoLP ('Hours of operation').

Table 2 at paragraph 176 states recommended closing times for different types of premises in the borough.

The *very latest* closing times suggested are as follows:

- Monday – Thursday: 01:00
- Friday & Saturday: 03:00
- Sunday: 00:00

Although not a nightclub, the premises already benefits from operating hours similar to those above i.e. –

The sale of alcohol to be consumed on the premises:

- Sunday - Thursday: 00:00 – 01:00
- Friday & Saturday: 10:00 – 03:00

The sale of alcohol to be consumed off the premises:

- Sunday - Thursday: 10:00 – 23:00
- Friday & Saturday: 10:00 – 00:00 (midnight)

Live & recorded music and late night refreshment:

- Sunday - Thursday: 23:00 – 01:00
- Friday & Saturday: 23:00 – 03:00

The above operating hours were only permitted after further conditions were added to the premises licence, subsequent to a prior variation application.

As explained in my representation, full council assembly (i.e. all elected councillors, including those who make up the licensing sub-committee) ratified and approved the current version of the SoLP, and have maintained the suggested operating hours four times in a row.

Thus, the operating hours suggested in the SoLP are the operating hours that councillors themselves think are suitable regarding licensed premises in the borough.

The application seeks to operate far outside of the latest terminal hours suggested in the SoLP.

I am of the opinion that the licensing sub-committee (which, as stated previously, includes local councillors who have approved and ratified those suggested operating hours) should determine the application, because the application seeks to allow operation of the premises past the very latest operating hours suggested in the SoLP.

The date within the consultation period on which I submitted my representation is immaterial, as an LSC will be required to determine the application in any case.

The licensing sub-committee is very experienced and always judges each application *on its own merits*. They can, and have, granted applications well outside of the operating hours suggested in the SoLP, based on the applicant's presentations at LSC hearings.

Any amendments to the hours proposed in the application, further conditions you wish to offer, or reference to the SoLP should be presented to the LSC at the hearing to determine the application.

It may very well be the case that, should you provide a presentation with reasonable and logical support for any hours that you seek, the application might be granted.

I reiterate that I'm not in a position to conciliate, as I contend that the LSC should determine this application for the reasons given above, and in the representation itself.

Regards,

**Wesley McArthur**

Principal Enforcement Officer - Licensing Unit  
London Borough of Southwark