



The Licensing Unit
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Metropolitan Police Service
Licensing Office
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Our reference: MD/24/1194

Date: 04/10/2024

Dear Sir/Madam

Re:- The Arch Companies Properties Limited Arch 4 Crucifix Lane London Bridge
SE1 3JW

Police are in possession of an application from the above for a new premises licence to provide late night refreshment, supply of alcohol and regulated entertainment.

The applicant describes the premises as follows:

Background Purposes Only.

The Arch Company is the UK's largest small business landlord, serving thousands of business owners who make a unique and vital contribution to the UK economy. With a property portfolio of approximately 5,200 railway arches, business estates, former station buildings and other properties, The Arch Company is proud to be the landlord to a diverse, passionate group of small business owners, entrepreneurs and community organisations across England and Wales. Arches 4 & 5 Crucifix Lane are newly refurbished commercial units in the heart of Southwark.

Application.

The applicant is the landlord who will not operate the premises but will transfer to a suitable tenant when identified.

We are making the application because, in challenging economic times, it is more attractive to an independent operator to take a premises with a premises licence thus avoiding the time and costs involved in making the application.

The Hours requested are:

Open to the public
Sun-Wed-0800hrs-0100hrs
Thurs-Sat-0800hrs-0200hrs

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

Supply of Alcohol
Sun-Wed-0800hrs-0030hrs
Thurs-Sat-0800hrs-0130hrs

Live Music
Sun-Wed-0800hrs-0030hrs
Thurs-Sat-0800hrs-0130hrs

Recorded Music
Sun-Wed-0800hrs-0030hrs
Thurs-Sat-0800hrs-0130hrs

The venue is located in Bankside, Borough, London Bridge Strategic Cultural Area. The applicant has not afforded us with a clear description of the venues operation and there is no mention of capacity, therefore we are unable to comment on whether the hours requested are suitable. Police do note that the hours requested reflect that of nightclub or similar establishment and as such we would expect to see robust conditions to address the licensing objectives, even with robust conditions police would have concerns in regards to another alcohol led venue and its effect on crime and disorder in an already saturated part of the Borough.

The Southwark Statement of Licensing policy recommends the latest Terminal hour for a non-nightclub venue to be 0100hrs and this would be a restaurant and control measures should reflect this.

The applicant has provided a number of control measures however most are basic and due to the lack of information on the how the venues will operate we cannot risk assess the operation and therefore cannot comment on their suitability to address all the licensing objectives.

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 must be precise and enforceable.

Police therefore object to this application on the grounds that in its current form it would have a negative impact on the licensing objectives, in particular the prevention of crime and disorder. Police would ask that the applicant addresses the previous mentioned concerns in regards to hour, venue operation and conditions, if this is achieved then there may be an opportunity to conciliate these applications.

Submitted for your consideration.
Yours Sincerely

PC Mark Lynch

Licensing Officer
Southwark Police Licensing

To: Licensing Unit	From: Wesley McArthur wesley.mcarthur@southwark.gov.uk 020 7525 5779 (on behalf of the Licensing Unit in its role as a responsible authority)	Date: 23 October 2024
Subject:	Representation	
Act:	The Licensing Act 2003 (the Act)	
Premises:	Arch 4, Crucifix Lane, London Bridge, London, SE1 3JW	
Application number:	884162	
Location ID:	201992	Ward: London Bridge & West Bermondsey

We object to the grant of an application for a premises licence, submitted by The Arch Company Properties Limited under The Licensing Act 2003 (the Act), in respect of the premises known as Arch 5, Crucifix Lane, London Bridge, London, SE1 3JW.

1. The application

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

Live music and recorded music (both indoors) –

- **Sunday - Wednesday: 08:00 – 00:30**
- **Thursday - Saturday: 08:00 – 01:30**

Late night refreshment (indoors and outdoors) –

- **Sunday - Thursday: 23:00 – 00:30**
- **Friday & Saturday: 23:00 – 01:30**

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

- **Sunday - Thursday: 23:00 – 00:30**
- **Friday & Saturday: 23:00 – 01:30**

The proposed opening hours of the premises are –

- **Sunday - Thursday: 08:00 – 01:00**
- **Friday & Saturday: 08:00 – 02:00**

Non standard timings for licensable activities and opening hours –

- From the end of permitted hours New Year's Eve to the start of permitting hours New Year's Day

The premises, and its intended operation, are described in the application as follows (verbatim):

- **"Background Purposes Only.**

The Arch Company is the UK's largest small business landlord, serving thousands of business owners who make a unique and vital contribution to the UK economy. With

a property portfolio of approximately 5,200 railway arches, business estates, former station buildings and other properties, The Arch Company is proud to be the landlord to a diverse, passionate group of small business owners, entrepreneurs and community organisations across England and Wales.

Arches 4 & 5 Crucifix Lane are newly refurbished commercial units in the heart of Southwark.

Southwark Policy.

These premises are small in size and the application seeks hours similar to the framework hours suggested within the policy. The locations are not residential and provide an opportunity to develop sites which are currently vacant.

Conditions have been offered within the application which we believe to be proportionate and adequate for the style and size of the operations.

Due to the reasons listed above we believe the application promotes the Licensing Objectives.

Application.

The applicant is the landlord who will not operate the premises but will transfer to a suitable tenant when identified.

We are making the application because, in challenging economic times, it is more attractive to an independent operator to take a premises with a premises licence thus avoiding the time and costs involved in making the application.”

2. The Statement of Licensing Policy (SoLP)

According to section 7 of this council’s statement of licensing policy 2021 – 2026 (the SoLP), the premises fall within London Bridge Strategic Cultural Area.

A copy of the SoLP is available via:

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

The following closing times are recommended in our SoLP in respect of various types of licensed premises located in London Bridge Strategic Cultural Area as stated -

Restaurants and cafes:

Sunday - Thursday: 00:00 (midnight)
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

Night clubs (with ‘sui generis’ planning classification)

Monday – Thursday: 01:00

Friday & Saturday: 03:00
Sunday: 00:00

Take-away establishments providing late night refreshment

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

Event premises / spaces where sale of alcohol is included in, and ancillary to, range of activities including meals

Sunday - Thursday: 00:00
Friday & Saturday: 01:00

3. The Locale

The premises are located on Crucifix Lane which is a moderately busy road behind London Bridge Rail and Underground Station.

Crucifix Lane is of mixed use, housing many commercial premises including offices, licensed premises, vehicle hire and sale and other types of commercial premises. There are also some residential premises on Crucifix Lane, including residential properties **directly opposite**, and very close to, the premises.

London Bridge Station is one of the busiest train stations in Europe, serving many thousands of commuters a week.

There are a high number of licensed premises serving alcohol in the immediate and wider vicinity.

During the evening and late at night Crucifix Lane is quiet with low levels of vehicular traffic.

Figure 1: View showing the close proximity of arches on Crucifix Lane to residential properties directly opposite the arches.



4. Our objection

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

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.

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 note that the applicant states the following regarding the premises:

- “These premises are small in size and the application seeks hours similar to the framework hours suggested within the policy. The locations are not residential and provide an opportunity to develop sites which are currently vacant.

Conditions have been offered within the application which we believe to be proportionate and adequate for the style and size of the operations.”

Firstly, we say that although of mixed use, Crucifix Lane houses residential properties – some of which are directly opposite the premises. Further to this, in the wider locale there are numerous residential properties and two large high density housing estates (see appendix 1).

Therefore, to say that the locations are not residential, is not entirely accurate.

Secondly, we say that it is impossible to say whether the conditions offered are proportionate, because at this time the applicant themselves do not know what type of tenant will take of the premises, or how that tenant will operate the premises.

We therefore recommend that, should the licensing sub-committee be minded to grant this application, the following conditions be included in any premises licence issued subsequent to this application, in addition to those stated in the application.

A. General – all four licensing objectives:

1. 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.
2. That any 'off sales' of alcohol shall be provided in sealed containers to be taken away from the premises.

3. That, to discourage 'street drinking' in the locale by customers of the premises, 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.

B. The prevention of crime and disorder:

4. 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.
5. That all CCTV footage shall be kept for a period of thirty-one (31) days and shall be made immediately available to authorised officers on request.
6. That a member of staff 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 authorised officers shall be on duty at all times that the premises are in use.
7. 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.
8. That clearly legible signage shall be prominently displayed where it can easily be seen and read by customers in the toilets advising to the effect that the taking of illegal drugs will not be tolerated at the premises. These notices shall be kept free from obstructions at all times.
9. That an incident log shall be kept at the premises to record details of any of the following occurrences at the premises:
 - a) Instances of anti-social or disorderly behaviour
 - b) Calls to the police or other emergency services
 - c) Any complaints received
 - d) Ejections of people from the premises
 - e) Visits to the premises by the local authority or emergency services
 - f) Any malfunction in respect of the CCTV system
 - g) All crimes reported by customers, or observed by staff
 - h) Any seizures of drugs or weapons
 - i) Any other relevant incidents

The incident log shall record the time, date, location in the premises and description of each incident, details of any action taken in respect of the incident and the printed name of the person reporting the incident. Details of incidents shall be recorded contemporaneously. 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. Details of incidents shall be recorded contemporaneously. If the incident log is a paper hardcopy, then the signature of the person reporting the incident in the log shall also be included. 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.

<<The above is to replace condition 12 in the application>>

10. That any 3rd parties / members of the public using the premises for a promoted or private event must complete a venue hire agreement as written and supplied by the premises licence holder. The venue hire agreement shall include the full name and address of the hirer, copy of valid photo identification of the hirer (kept on file in accordance with data protection requirements), the hirer's signature and the date that the venue hire agreement has been signed. The venue hire agreement shall include all of the licensee's terms of hire. Such agreements shall be kept on file for 6 months from the date of the event and be made immediately available to responsible authority officers on request.
11. That door supervisors will be employed as follows:
 - a) That a minimum of two (2), SIA registered door supervisors will be employed at the premises at all times after 22:00 hours on any day that the premises will shut at 00:00 (midnight) or after, at any time that the premises are being used for DJ or music led events and at any time when major sporting events are to be shown at the premises.
 - b) The 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 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.
 - c) The door supervisors shall remain at the premises until all patrons have vacated the premises and until at least 30 minutes after the premises close.
 - d) The door supervisors shall be easily identifiable.
 - e) That when SIA security staff are deployed at the premises they shall be supplied with, and shall use, metal detectors (either metal detection arches or handheld metal detectors) to search all customer entries or re-entries to the premises. Prior to the premises opening the metal detectors shall be checked to ensure that they are in full working order. A log of such checks shall be kept at the premises and shall include the name of the person who undertook the check, the outcome of the check, and the time and date of the check. The log shall be made immediately available to responsible authority officers on request.
12. 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 authorised officers on request. The entry policy shall cover (but not necessarily be limited to):
 - a) Safe customer entry to the premises,
 - b) If / when applicable searching / scanning of attendees,
 - c) The barring of customer entry to the premises for any reason,
 - d) Restricted items (e.g. weapons / drugs or any other items restricted by the licensee),
 - e) Pre-opening safety checks of the premises,
 - f) Dealing with overcrowding and / or crowd surges
 - g) Dealing with suspect packagesAll relevant staff shall be trained in the implementation of the latest version of the entry policy and details of such training shall be recorded in the staff training logs at the premises.

C. Public Safety

13. 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>>

14. That counting devices shall be used by the staff who are controlling customer entry to the premises to keep an accurate count of the number of people at the premises and to ensure that the premises' accommodation limit is never exceeded. Staff using the counting devices should be able to determine the number of people at the premises immediately on the request of authorised officers.

15. That illuminated emergency escape route and emergency exit signage ('emergency lighting') shall be installed at the premises, be maintained in full working order, be operational at all times that the premises are in use and shall be maintained free from obstruction at all times.

16. 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.

17. That no identified emergency exits shall be kept locked / bolted shut at any time that the premises are in use.

18. That appropriate first aid equipment / materials shall be kept at the premises in a 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.

19. That an accident book / recording system shall be maintained at the premises and be available and in use at all times that the premises are in operation. The accident book / recording system shall meet all current legislative requirements. Details of any accidents will be recorded in the accident book / recording system contemporaneously. The accident book / recording system shall be made immediately available to responsible authority officers on request. Relevant staff shall be trained in this, and 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.

20. That 'Ask for Angela' posters (or posters relating to whatever similar scheme may be recommended at any time) shall be displayed in the female toilet facilities and kept free from obstructions at all times. All staff shall be trained in the 'Ask for Angela' scheme (or similar scheme) and shall perform the appropriate course of action in the event of a customer requesting assistance. 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.

21. That all drinks shall be sold in cans or plastic bottles or will be decanted into recyclable polycarbonate (or a similar material), or recyclable cardboard drinking receptacles. Glass drinking receptacles will not be used at the premises at any time.

D. The prevention of public nuisance

22. 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, premises manager, sound engineering staff, or other person(s) nominated in writing by the licensee, 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.
23. That a log with details of the calibration of any sound limiting device (or similar equipment), including who calibrated the device, what time it was calibrated, any internal and external sound level measurements taken, whether external measurements were taken with the premises' windows and doors open, and any other relevant technical details shall be kept at the premises and be signed off by the person who calibrated the device. The log shall be made immediately available to authorised officers on request.
24. That only the licensee, premises' manager, sound engineering staff, or other person(s) nominated in writing by the licensee, shall have access to any amplification equipment and the sound limiting device (or similar equipment) at the premises, and only such staff shall be permitted to change any control settings on said equipment.
25. That a log of persons permitted access to the amplification equipment and the sound limiting device (or similar equipment) at the premises shall be kept at the premises and provided to authorised officers on request.
26. 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:
 - a) Details as to how customer / staff egress at the premises shall be managed to minimise causing nuisance.
 - b) Details of public transport in the vicinity and how customers will be advised in respect of it.
 - c) Details of the management of taxis to and from the premises.
 - d) Details of the management of any 'winding down' period at the premises.
 - e) Details of the use of security and stewarding in respect of managing customer dispersal from the premises.
 - f) Details of any cloakroom facility at the premises and how it is managed.
 - g) Details of road safety in respect of customers leaving the premises.
 - h) Details of the management of ejections from the premises.
 - i) Details as to how any physical altercations at the premises are to be managed
 - j) 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. If the dispersal policy is a paper document, then the signature of the trainees shall also be included. The dispersal policy shall be made immediately available to responsible authority officers on request.

27. That any advertising, marketing or media relating to the premises (including websites) 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.
28. That the management shall assign a designated pick-up spot / 'pick up pin' with all current online taxi hailing services (e.g. Uber, Bolt etc.).
29. 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.

<<The above is to replace condition 6 in the application>>

30. That any litter caused by the operation of the premises shall be cleared away from the immediate vicinity of the premises periodically throughout operating hours, and at the end of trade, on each day that the premises are in operation. Relevant staff shall be trained in this, and 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.
31. That suitable external containers for customer's cigarette butts shall be provided at all times that the premises are in use. Such containers shall be emptied regularly to ensure that they can be used at all times that the premises are in use, and so that they do not overflow and cause cigarette butt litter in the vicinity.
32. That external waste handling (including recyclable materials and glass / bottles), collections of goods from the premises, deliveries of goods to the premises and the cleaning of external areas shall only occur between the 07:00 hours and 20:00 hours.

<<The above is to replace conditions 8 & 9 in the application>>

33. That any external areas of the premises will be closed to customers between 22:00 hours and 08:00 hours the following day except for up to a maximum of 5 people at any one time using the external areas after 22:00 hours to smoke only. Any outdoor furniture to the premises' frontage must be packed away, or rendered unusable, by 22:00 hours each day.
34. That, if and when required, staff shall interact with customers to ensure that customers behave at the premises in a quiet and orderly manner and also leave the premises and locale in a quiet and orderly manner. Customers deemed by staff to be engaging in anti-social behaviour shall be asked to leave the premises. All relevant staff shall be trained in this, and 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.

E. The prevention of children from harm

35. That no person under 16 years old shall be permitted on the premises unless they are accompanied by an adult.
36. That a child protection / vulnerable persons policy will be devised and maintained at the premises. A copy of the child protection / vulnerable persons policy shall be kept at the premises with the premises licence and shall be made immediately available

for inspection to council and / or police officers on request. All staff shall be trained in the implementation of the latest version of the child protection policy and details of such training including the printed name of the trainee and the date of the training, shall be recorded in the staff training logs at the premises.

37. 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.
38. 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 responsible authority officers on request.
39. 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.
40. 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 responsible authority officers on request.
41. That no deliveries from the premises of alcohol shall be permitted.

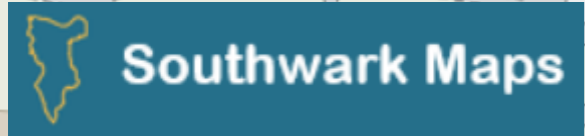
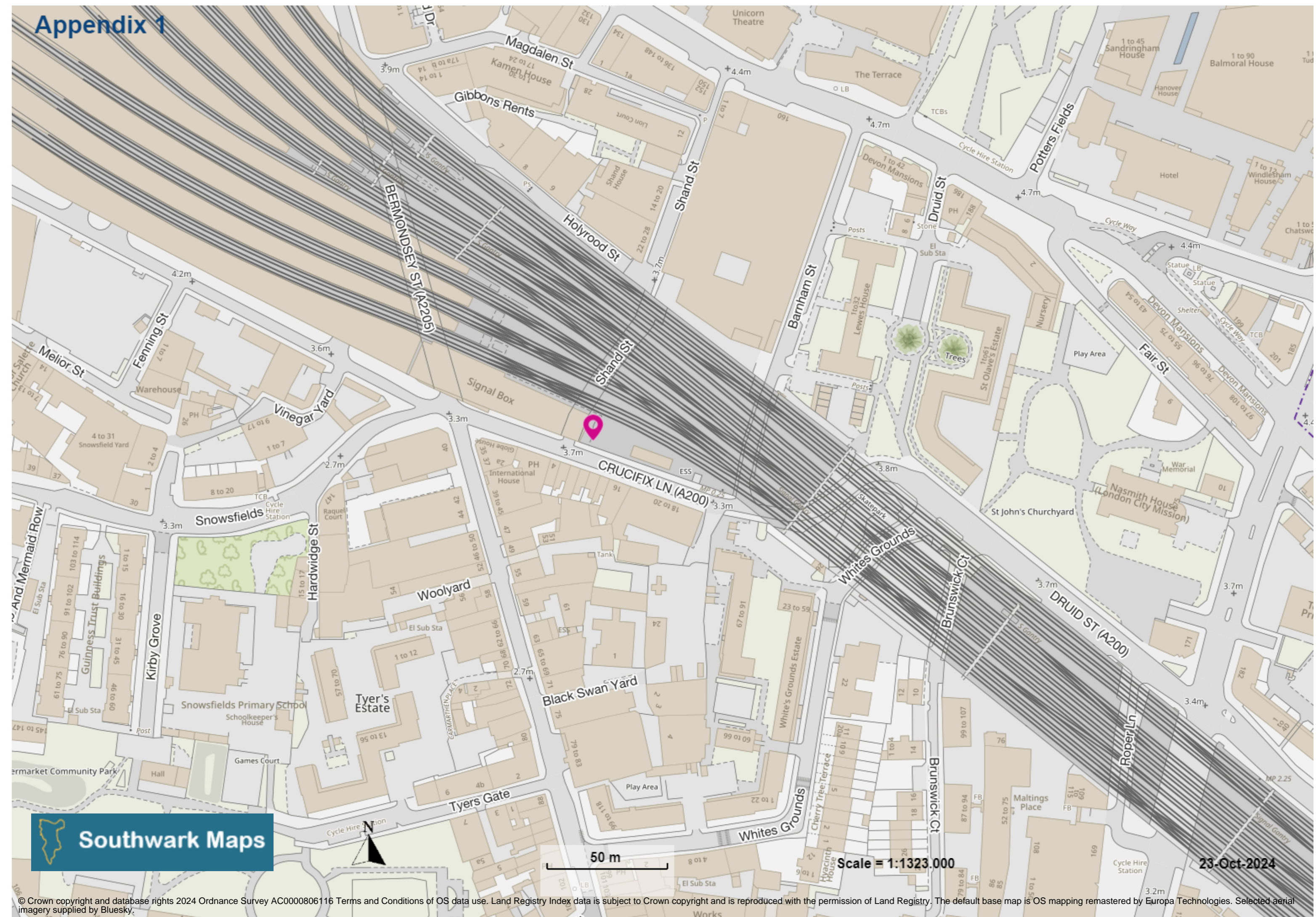
We advise that once the exact style of operation of the premises is known, and if a premises licence is granted regarding this application, an application to vary any of the above conditions could be submitted to ensure that any licence conditions are congruent with the operation of the premises.

Should the applicant wish to discuss the above, we advise them to contact us as soon as possible.

If the applicant agrees to all of the proposed conditions, then we will withdraw this representation.

Yours sincerely,

Wesley McArthur
Principal Enforcement Officer



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23-Oct-2024