

Southwark Draft Statement of Licensing Policy			Appendix D	
Part One – Detailed Responses from Responsible Authorities & Other Persons				
Section 2 – All About Southwark				
Section / Subject	Respondent Name	Contact Details	Comment	Initial feedback
Section 2 – All About Southwark	James Barber Liberal Democrat Councillor for East Dulwich	c/o Members' Room 160 Tooley Street London SE1 2QH	<p>Page.9 the current unemployment figures are much lower than stated in in section 4 of this page. In Dulwich &amp; West Norwood alone 3.5%</p> <p>Page.9 paragraph 5 on this page about Key Stage 1 &amp; 2 achievement + GCSE and A level results are above UK averages - for example Key Stage 2:</p> <p><a href="http://www.education.gov.uk/schools/performance/download/pdf/210_ks2.pdf">http://www.education.gov.uk/schools/performance/download/pdf/210_ks2.pdf</a></p> <p>Page 11 paragraph 20 takes a very narrow view of the harm from alcohol - police stats of alcohol VAP. THEN you talk about LAS stats. Can you reverse this and talk about ambulance statistics which represents a huge concern of large monetary value. You also don't compare LAS stats since 2007. So it doesn't appear to give a balanced view.</p> <p>Page 12 you then talk about Southwark mortality from alcohol are not significantly above national pro regional average. Why not state a table of these adding Lambeth and Lewisham our neighbouring boroughs with national and regional data?</p>	Comments noted – the section providing statistics will be revisited.
Section 2- All About Southwark - Southwark and the leisure and entertainment industry	Gavin Blackburn, Senior Enforcement Officer on behalf of Planning Policy & Enforcement	Chief Executive's Department, 160 Tooley Street, PO Box 64529, London, SE1P 5LX	Southwark is home to a diverse range of communities, who contribute to the variety of leisure and cultural activity within the borough. New communities will create new enterprises to meet the leisure demand that arises, which we support. You support new enterprise by providing training as to how to meet regulatory requirements. I think maybe around paras 15 and 16 of section two all about Southwark a bit more detail about the diverse nature of the borough would help.	Noted. Additional content will be incorporated.

Section 2 – All About Southwark – Alcohol and Public Health	Paul Gander, Trading Standards Team Leader	C/O Community Safety & Enforcement Division, 160 Tooley Street, PO Box 64529, London, SE1P 5LX	Consider adding a paragraph highlighting the potentially lethal public health consequences of consuming counterfeit alcohol products. Responsible traceable sourcing of stock from the legitimate supply chain is vital to minimise the risk of serious incidents.	Noted. Additional content will be incorporated.
Section 2 – All About Southwark – Alcohol and Public Health	Director of Public Health	Chief Executive's Department, 160 Tooley Street, PO Box 64529, London, SE1P 5LX	<p>The Director of Public Health has the role of a Responsible Authority for the purposes of the Licensing Act 2004. The social and economic benefits of a well managed licensed alcohol sector need to be balanced against the increasing levels of alcohol related hospital admissions, alcohol related attendance at A&amp;E, and alcohol related disease and mortality. The Director of Public Health sees the Statement of Licensing Policy as crucial in helping Southwark achieve the right balance.</p> <p>The Director welcomes the Draft Statement of Licensing Policy, the depth of content and in particular the best practice and high standards apparent in the document. The consultation specifically seeks views on the Cumulative Impact Policies for the borough and the suggested closing times. They are addressed in this response along with other comments.</p>	Additional content will be incorporated
<b>Section 3 – Purpose and Scope of Policy</b>				
Section 3 – Purpose and scope of the policy – General information	James Barber Liberal Democrat Councillor for East Dulwich	c/o Members' Room 160 Tooley Street London SE1 2QH	Pages 15/16 mentions alcohol control area excepting Dulwich. How can we seek to remove that exception?	Advice will be sought and forwarded.
Section 3 – Purpose and scope of the policy – General information	Councillor Adele Morris Cathedrals Ward Liberal Democrat Councillor Deputy Leader, Southwark Liberal	c/o Members' Room 160 Tooley Street London	We welcome the Council's continued commitment to maintaining a Night Time Economy team to monitor licensed premises in problem areas. However, there is a feeling amongst residents that enforcement is poor in regards to drinkers being allowed to block the pavements. This can start as early as lunchtime on a Friday, and causes disturbance to residents from both noise and obstruction. The	Consideration will be given by the partner agencies as to how these issues may be best

	Democrat Group Opposition Spokesperson for Regeneration. On behalf of Southwark Liberal democrat Group	SE1 2QH	disturbance increases as the evening wears on and people become more drunk, more noisy and less aware of their surroundings. Some premises allow their patrons to completely fill the pavement area outside, causing passers by to have to walk in the road. This needs to be better controlled through enforcement.	controlled. Advice will be incorporated in the final policy revision.
<b>Section 4 – Administration, Exercise and Delegation of Function</b>				
Section 4 – Administration, Exercise and Delegation of Function – Provision of scale plans	Gavin Blackburn, Senior Enforcement Officer on behalf of Planning Policy & Enforcement	Chief Executive’s Department, 160 Tooley Street, PO Box 64529, London, SE1P 5LX	Para 49 request for scale plans. We require plans to have a scale bar on them so that they can be scaled on a screen (by us or the public) and are not reliant on being a particular scale on a particular sized piece of paper.	Noted. Additional content will be incorporated.
Section 4 – Administration, Exercise and Delegation of Function – Temporary event notices	Gavin Blackburn, Senior Enforcement Officer on behalf of Planning Policy & Enforcement	Chief Executive’s Department, 160 Tooley Street, PO Box 64529, London, SE1P 5LX	I appreciate that you are constrained by the law on these. Planning are not currently notified of these and could probably not respond adequately in time if they were. I estimate that we serve about three or four planning enforcement notices a year on premises that either are licenced, or have potential for licensable activity. Would there be any scope to register an advance objection to TEN’s at particular addresses which would be effectively red flagged so that if a TEN comes in either the Licensing Officer can see the enforcement notice and raise an objection, or planning can be notified and request that either Police, Licensing or EPT object on our behalf.	Planning has no ability in law to make representations with regard to temporary event notices. Where there are particular relevant planning concerns these can be recorded on the licensing service database for reference when the environmental protection team, being a permitted respondent,

				considers background information on new notifications
Section 4 – Administration, Exercise and Delegation of Function – Temporary event notices	John Brunton for the Herne Hill Society	The Herne Hill Society, PO Box 27845, London, SE24 8AX	Paragraph 59 recognises that many temporary event notices will give rise to concerns. Health and safety and protection of children are mentioned in this context. However, we have experience of establishments in Herne Hill where temporary event notices are used to extend opening hours significantly beyond those permitted in the premises licence. We have had reports from residents living near to these establishments that they experience noise, serious disruption and upset arising from late night opening permitted with these TENs. This strongly suggests that it would be appropriate to add ‘public nuisance’ to the listed problems that TENs can create, even though is referred to towards the end of the paragraph.	Noted. Additional content will be incorporated.
Section 4 – Administration, Exercise and Delegation of Function – Consultation arrangements	John Brunton for the Herne Hill Society	The Herne Hill Society, PO Box 27845, London, SE24 8AX	<p>In paragraph 62, the use of the phrase ‘displayed immediately on or outside premises concerned’ could be misinterpreted. To avoid any confusion and to ensure that people are made fully aware that an application has been made, we suggest that a sentence be added to the effect that it is a requirement that all public notices are displayed in such a way that they are clearly visible and legible to anyone going past the premises.</p> <p>Paragraph 64 sets out how Southwark will publicise the fact that a licence application has been made. However, there appears to be no mention of placing an advertisement in the press. This is a very useful and effective additional means of bringing applications to the public notice and, in any case, seems to be part of Southwark’s current normal practice. We therefore recommend that use of press advertisements be included in this paragraph.</p>	<p>Noted. Additional content will be incorporated.</p> <p>Reference can also be made to the requirement for a newspaper advertisement</p>
Section 4 – Administration, Exercise and Delegation of Function – Licence review process	Sally Slade, Trading Standards, Food Safety & Occupational Health & Safety Unit Manager	C/O Community Safety & Enforcement Division, 160 Tooley Street, PO Box 64529, London, SE1P	<p>As Responsible Authority the Trading Standards service regularly uses the review process as a means of placing sanctions upon licence holders who do not comply with licence conditions or commit other contraventions relating to the supply of alcohol and other similar offences.</p> <p>A range of sanctions are available and the expected outcome is to improve the management of the premises and reduce the risk that further offences will occur.</p>	<p>The licensing service shares the frustrations of the trading standards team.</p> <p>The issue</p>

		5LX	<p>Trading Standards are increasingly finding that while the process is satisfactory and the desired outcome is achieved, in that the licencing sub committee understand the issues and deliver appropriate sanctions. In practice the effect on the review is diluted by limitations within the review process itself.</p> <p>One issue is the lack of a comprehensive database of licenced premises and individual licences. Officers are unable to identify which premises are linked within and across boroughs or where individual licence holders have a history of poor management and contraventions in other boroughs.</p> <p>However this is not the only limitation to the process and Trading Standards officers are frustrated in their actions by sound sub-committee decisions being undermined by the appeals processes and other delaying devices and loopholes which are being invoked by licence holders and their legal representatives.</p> <p>It would be helpful if this could be the subject of an inquiry to determine if the process can be tightened up to improve the enforcement outcome.</p>	<p>regarding the lack of a national database of personal licence holders is beyond the service control, however. This was intended to be established at the introduction of the Act but has never materialised. It is understood that this is considered too complex a task to successfully achieve.</p> <p>The licensing service will discuss tighter control over the review process with legal services and incorporate any improvements where identified.</p>
<b>Section 6 – Other Related Legislation and Strategies</b>				
Section 6 – Other Related Legislation and Strategies – Planning and building	Gavin Blackburn, Senior Enforcement Officer on behalf of Planning Policy & Enforcement	Chief Executive’s Department, 160 Tooley Street, PO Box 64529, London,	In section 6 reference is made to Planning and Building Control roughly along the lines of Home Office guidance. I know your officers regularly advise applicants of the need to obtain planning permission. Nevertheless planning probably has three or so cases on going at any one time in which activity is licenced that has no prospect of planning permission. These cases although a minority are extremely problematic. In part they arise, because of the different assessments the two	Noted. Additional content will be incorporated. Additionally, the latest version of the Home Office

regulations regimes		SE1P 5LX	<p>regimes carry out. Planning considers amenity, not nuisance and once granted is not subject to review, it therefore has to consider future potential use and development and if appropriate constrain it. Licensing on the other hand considers nuisance and if this arises can consider review at a future date meaning that the potential for a problem is less of a consideration as the emphasis is on managing a problem if it occurs.</p> <p>The vast majority of bars restaurants etc are able to operate within these two regulatory controls, but it would be helpful to emphasise the necessity of meeting the lower level of activity permitted, which in practice in the majority of cases is likely to be that permitted by planning. Please could this be done at the outset of section 6.</p> <p>Lower level is both hours of operation and the type of use. In planning terms alcohol can be sold from the following categories of premises:</p> <p>Shop A1 (off sales)  Restaurant A3  Bar A4  Institutions, Assembly and leisure D1/ D2 (halls, cinemas, concert dance halls)  Nightclubs</p> <p>It is not appropriate to seek a licence that involves or is intended to facilitate a change of use, without at the same time seeking planning permission. Applicants should note that in protected shopping frontages in Southwark the flexible use change from A1 to A3 does not apply and planning permission is still required. See <a href="http://www.southwark.gov.uk/info/856/planning_policy/3289/article_4_directions">http://www.southwark.gov.uk/info/856/planning_policy/3289/article_4_directions</a></p>	Guidance (March 2015) allows for discussions between licensing and planning where simultaneous applications for a planning consent and premises licence application are made.
<b>Section 7 – Prevention of Crime and Disorder</b>				
Section 7 – Prevention of Crime and Disorder – Relevant issues	Sally Slade, Trading Standards, Food Safety & Occupational Health & Safety Unit Manager	C/O Community Safety & Enforcement Division, 160 Tooley Street, PO Box 64529,	<p>The draft document omits recent trends in substance and product use and abuse such as shisha, new psychoactive substances, issues around illegal working, HMO's and exploitation of vulnerable people.</p> <p>Some suggestions for inclusion</p> <ul style="list-style-type: none"> <li>• Paragraph 107 – Include shisha bars. Maybe these should be referenced</li> </ul>	Noted. Additional content will be incorporated.

		London, SE1P 5LX	<p>elsewhere as a trend which has arisen since the last policy consultation</p> <ul style="list-style-type: none"> <li>• Para 140 – Include legal highs ‘New Psychoactive substances’; Illegal workers and HMOs; Child Sexual Exploitation</li> </ul>	
Section 7 – Prevention of Crime and Disorder – Mandatory conditions	John Brunton for the Herne Hill Society	The Herne Hill Society, PO Box 27845, London, SE24 8AX	Paragraph 146(a) could be interpreted as requiring that a personal licence holder must be available to authorise every sale or supply of alcohol. However, paragraph 176 makes it clear that the personal licence holder need not be present for every transaction. To avoid any confusion, perhaps paragraph 146(a) should include a cross-reference to paragraph 176.	Noted. Clarification will be given.
Section 7 – Prevention of Crime and Disorder - Matters for consideration by applicants	PC Ian Clements	Licensing Office Southwark Police Station, 323 Borough High Street, SE1 2ER	<p>Having reviewed the policy I have one observation with regard to the prevention of crime and disorder licensing objective.</p> <p>We have a large number of late night venues many of which are required to employ SIA registered door staff as a condition of their licence. Although the industry has seen vast improvements over the years I believe there is still room for improvement.</p> <p>A number of firms have taken one additional step and have become approved contractors.</p> <p>I believe this gives the premises that extra reassurance that the staff they employ have undertaken the correct training and are employed by firms that have taken the additional step in becoming approved by the SIA.</p> <p>I am suggesting that any new premises licence applications or variations that might attract a condition for the employment of SIA staff should only consider employing SIA approved contractors.</p>	Noted. Additional content will be incorporated.
Section 7 – Prevention of Crime and Disorder - Matters for consideration by applicants	Paul Gander, Trading Standards Team Leader	C/O Community Safety & Enforcement Division, 160 Tooley Street, PO Box 64529, London, SE1P	<p>Proposed amendments to matters for consideration by applicants for licences</p> <p><b>Paragraph 150 – All premises</b></p> <ul style="list-style-type: none"> <li>• My version has bond fide instead of bona fide (bullet point 7).</li> <li>• ‘Install’ should read ‘Installation of’</li> <li>• Develop to ‘Developing of’</li> </ul>	Noted. Additional content will be incorporated.

		5LX	<ul style="list-style-type: none"> <li>• Use bona fide to Use of bona fide</li> <li>• Deny to Denying</li> </ul> <p>Amend</p> <ul style="list-style-type: none"> <li>• <b>Use bona fide suppliers</b> – Only source alcohol, tobacco and other products from authorized or bona fide suppliers</li> </ul> <p>To</p> <ul style="list-style-type: none"> <li>• <b>Use of bona fide suppliers</b> – Being mindful of the prevalence of counterfeit products, particularly alcohol and tobacco, to only source stock from authorised, legitimate and traceable suppliers and to have regard to the traceability requirements in Regulation 4 of the General Food Regulations 2004 (these require food business operators to be able to identify the source of food products they supply).</li> </ul> <p><b>Paragraph 151 – Premises providing alcohol for consumption upon the premises</b></p> <p>Amend</p> <ul style="list-style-type: none"> <li>• <b>Use of plastic containers and toughened glass</b> – Consideration should be given to the use of safer alternatives to glass which would inflict less severe injuries if used as weapons. Note: That any glass alternatives used for measuring draft beer and cider must be lawful for trade use under weights and measures legislation</li> </ul> <p>to</p> <ul style="list-style-type: none"> <li>• <b>Use of plastic containers and toughened glass</b> – Consideration should be given to the use of safer alternatives to glass which would inflict less severe injuries if used as weapons (any glass alternatives used for measuring draft beer and cider must still be lawful for trade use under weights and measures legislation).</li> </ul>	
Section 7 – Prevention of Crime and Disorder - Matters for	Sally Slade, Trading Standards, Food Safety & Occupational Health & Safety Unit Manager	C/O Community Safety & Enforcement Division, 160 Tooley Street,	Proposed amendments to matters for consideration by applicants for licences <b>Paragraph 150 – All premises</b> Include after ‘Use bona fide suppliers’ – Retain invoices to prove that bona fide	Noted. Additional content will be incorporated.

consideration by applicants		PO Box 64529, London, SE1P 5LX	retailers have been used and duty paid  <b>Paragraph 152 – Premises providing alcohol for consumption upon the premises</b>  Install ID scanning – Ensure that PASS approved Proof of Age cards are accepted as part of the age verification system	
Section 7 – Prevention of Crime and Disorder - Cumulative Impact Policies	John Brunton for the Herne Hill Society	The Herne Hill Society, PO Box 27845, London, SE24 8AX	We strongly support the concept that the cumulative impact of an increasing number of licensed premises should be taken into account. However, in Herne Hill where the boundary between Southwark and Lambeth passes through the middle of the area, this effect must be based on evidence from both Boroughs, including data on crime and disorder from police on each side of the ‘border’. The policy, in its final form, should make this clear.	Herne Hill does not currently feature as either an established cumulative impact policy area or an area under monitor. A full review of cumulative impact areas is proposed as an outcome of this process
Section 7 – Prevention of Crime and Disorder - Cumulative Impact Policies	Director of Public Health	Chief Executive’s Department, 160 Tooley Street, PO Box 64529, London, SE1P 5LX	<b>Summary of response</b> Public Health’s recommendations for amendments to the draft Statement of Licensing Policy are outlined below. The related evidence and supporting argument are given in more detail as appendices. In summary, Public Health recommends that:  1. The existing CIP areas should be continued (Appendix 1)  2. There needs to be guidance on expectations of evidence and cases made for license applications in CIP areas. This should be developed and added to the Statement of Licensing Policy. An example of such an approach is included as Appendix 1a – from Leeds.	Noted. Additional content will be incorporated.

Section 7 – Prevention of Crime and Disorder - Cumulative Impact Policies	Sally Slade, Trading Standards, Food Safety & Occupational Health & Safety Unit Manager	C/O Community Safety & Enforcement Division, 160 Tooley Street, PO Box 64529, London, SE1P 5LX	CIPS should include petrol stations. Often identified as high risk for underage sales.  Why are the categories of premises captured by the policy not consistent across each of the current policy areas?	Support for saturation policies is noted.  Categories of premises captured is not consistent across current policy areas as each is subject to separate council decision taking into account local circumstance. Petrol stations did not feature in information available at time of decisions.
Section 7 – Prevention of Crime and Disorder - Cumulative Impact Policies	Ann Flynn, Development Manager Safeguarding Children Board	Southwark Safeguarding Children Board PO Box 64529 4th Floor Hub 1 160 Tooley Street London SE1P 5LX	I support the proposal on saturation policy	Noted.
Section 7 – Prevention of Crime and Disorder – Cumulative impact policies	Professor John Moxham Director for Clinical Strategy for King Health Partners Member, Southwark Health & Wellbeing	Kings Health Partners	In 1905 the Director of Public Health for Southwark reported that alcohol was a major problem for the Borough, leading to antisocial behaviour, violence, inability to work, poverty, destroyed families, blighted lives for children, and multiple diseases. A similar report could now be written 110 years later. You will know that alcohol causes problems at the very start of people’s lives. Alcohol is associated with all sorts of violence including rape and domestic abuse, as well as damage to	Noted

	Board		<p>the unborn child. Alcohol excess has a terrible effect on the early years of the lives of children. When I attend the Health and Wellbeing Board I repeatedly hear from police leaders that alcohol is causing violence throughout the Borough. In my work as a consultant at King's for the last 30 years or so the dreadful effects of excessive alcohol on health have always been obvious to me and my colleagues, as you are aware, they are increasing. Indeed, the rise in liver disease is truly dramatic.</p> <p>The greatest determinants of alcohol consumption are price and availability. I fully understand that it is difficult for the Borough to address the issue of price although I see no reason why it should not try, perhaps working in collaboration with other local Borough, who are all plagued by the same problems. Availability of alcohol <u>is</u> within the control of the Borough and it should do all in its power to promote sensible consumption. It is not clear to me why it is not necessary for small corner shops to sell cheap and strong alcohol virtually 24 hours a day. Similarly it is not clear to me why pubs are able to serve alcohol at breakfast time.</p> <p>I am therefore writing to urge you to continue the Cumulative Impact Zones and also for more effective encouragement of 'best practice' and assurance of licensing conditions. I greatly welcome the inclusion of guidance on opening and closing times but this needs strengthening.</p> <p>I look forward to the Director of Public Health being able to write a report on alcohol that demonstrates significant progress. To drive this it is time the Borough documented hard outcomes of alcohol harm and monitored progress against them.</p> <p>Finally, I would remind the Borough that the health care facilities available to its population are amongst the best in England (although I appreciate that they are far from perfect). It is absolutely clear and fully recognised in the 5 Year Forward View that the main problem that threatens the health and social care system and the continuation of an effective NHS is the poor health of the people. Strengthening alcohol control could make an important contribution to the future lives of all residents of Southwark and the sustainability of health and social care.</p>	
Section 7 – Prevention of Crime and	Dr Yvonneke Roe. Local GP and Chair of the Resilient Communities	Southwark NHS, Clinical Commissioning	As a local GP and the clinical lead for the prevention board at NHS Southwark CCG, I am especially concerned about the impact of harmful and hazardous drinking including binge drinking on the health of Southwark's population. My GP	Comments made and support for CIPs is noted.

Disorder - Cumulative Impact Policies	& Prevention Programme Board	Group (CCG) & Member of the Health and Wellbeing Board	colleagues and I are seeing more patients who are affected by alcohol misuse and the impact on families and on other services such as Accident & Emergency, especially at weekends.  <b>Cumulative Impact Policies</b> - I welcome the continuation of CIPs. I would like to see fewer alcohol licensed premises in already saturated areas as I believe the clustering of premises in saturated areas will contribute towards problem drinking and alcohol related anti social and violent behaviour. I am also concerned about the visibility of alcohol in some saturated high street areas (e.g. vivid window displays, 'special offer' displays from pubs and bars and shops). In my opinion, the saturation and the high visibility of alcohol will only reinforce unhealthy drinking (i.e. binge, harmful and hazardous levels of alcohol consumption) as a norm.	
Section 7 – Prevention of Crime and Disorder - Cumulative Impact Policies	Gavin Blackburn, Senior Enforcement Officer on behalf of Planning Policy & Enforcement	Chief Executive's Department, 160 Tooley Street, PO Box 64529, London, SE1P 5LX	Is any consideration being given to expanding saturation areas to cover Old/New Kent Road and possibly Elephant, as the residential density of these areas will increase significantly in the coming years and they already have sizable licensed venues within them.	Both the Old Kent Road corridor and the Elephant & Castle are currently under monitor. The situation will be reviewed under the Partnership Analysis of Alcohol Related Harm for 2014.
Section 7 – The Prevention of Crime & Disorder – Cumulative Impact Policies	Councillor Adele Morris Cathedrals Ward Liberal Democrat Councillor Deputy Leader, Southwark Liberal Democrat Group Opposition Spokesperson for Regeneration. On behalf of Southwark Liberal	c/o Members' Room 160 Tooley Street London SE1 2QH	We welcome the continuation of CIPs although they do not appear to be consistently supported by the responsible authorities when it comes to responding to new applications. We are particularly concerned that Public Health England do not appear to be using their newly acquired powers to object, and wonder whether the licensing department is taking proactive steps to engage with them. Without the regular input of the responsible authorities, the onus is on local councillors and residents to object. Other boroughs appear to be able to stop new premises applications with these policies, whereas in Southwark they seem to have had minimal impact.	Public health are the most recently appointed of the listed responsible authorities under the Licensing Act 2003. Their role is new and potentially affected by the

	democrat Group			fact that public health is not a licensing objective. The licensing service are in regular contact with public health colleagues and discussion on how the role might be developed. Consideration is also being given to the licensing authority's own responsible authority role and how it might best support the council's CIPs.
Section 7 – The Prevention of Crime & Disorder – Cumulative Impact Policies	James Barber Liberal Democrat Councillor for East Dulwich	c/o Members' Room 160 Tooley Street London SE1 2QH	Page 38/39 Saturation policies. With so very many licences in East Dulwich ward especially Grove Vale and Lordship Lane - how can we initiate a saturation policy covering this area?	Full review of cumulative impact is being proposed
Section 7 – The Prevention of Crime & Disorder – Cumulative Impact Policies	Jon Abbott, Head of Regeneration (North)	Chief Executive's Department, 160 Tooley Street, PO Box 64529, London, SE1P 5LX	From a regeneration perspective we would support dropping the cumulative impact policy (for Borough & Bankside). We don't view this an appropriate or necessary measure in what is an opportunity area in both the London and Southwark plans. This is a locality which is the focus in both the Southwark and London plan for growth in new homes , business and economic activity. The area also has many tourist attractions some of which are of international status. Generally policy should therefore seek to provide a supportive framework for responsible licensing of venues which	Comments are noted and will be reported to the licensing committee

			will be necessary to support growth within the opportunity area creating employment opportunities. The application of the Lambeth hours of operation policy would provide sufficient flexibility to address concerns about impacts on residential amenity . Consideration could be given to ensuring that design standards for new mixed use buildings including residential on upper floors have appropriate measures to mitigate noise and disturbance.	
Section 7 – The Prevention of Crime & Disorder – Cumulative Impact Policies	Neil Kirby, Head of Regeneration (South)		From a regeneration perspective we would support dropping the cumulative impact policy for Peckham and Camberwell. We don't view this an appropriate or necessary measure in what is an opportunity area in both the London and Southwark plans. These are localities which are the focus in both the Southwark and London plan for growth in new homes , business and economic activity. Generally policy should therefore seek to provide a supportive framework for responsible licensing of venues which will be necessary to support growth within the opportunity area creating employment opportunities. The application of the Lambeth hours of operation policy would provide sufficient flexibility to address concerns about impacts on residential amenity . Consideration could be given to ensuring that design standards for new mixed use buildings including residential on upper floors have appropriate measures to mitigate noise and disturbance.	Comments are noted and will be reported to the licensing committee
Section 7 – Prevention of Crime and Disorder - The proposal to incorporate suggested appropriate operating hours based on premises	Dr Yvonneke Roe. Local GP and Chair of the Resilient Communities & Prevention Programme Board	Southwark NHS, Clinical Commissioning Group & Member of the Health and Wellbeing Board	<p><b>Closing times</b> – I welcome guidance on closing times as I believe that longer drinking hours especially late into the night will contribute towards binge drinking and inebriation and related health, accident, injury, violence and anti-social behaviour. I am very much concerned about the proposed closing times which in my opinion are too late. I strongly recommend the following earlier closing times:</p> <p><b>Pubs and bars</b> 11pm Sunday to Thursday. Midnight Friday and Saturday  <b>Nightclubs</b> 1am – Sunday to Thursday. 2am Friday and Saturday  <b>Restaurants and cafes</b> 11pm – Sunday to Thursday. Midnight Friday and Saturday  <b>Off licenses</b> 11pm – Monday to Sundays.  <b>Hot food and drink supplied by takeaways, fast food</b> - Midnight – Sunday to</p>	Recommendations are noted and will be put to the sub-committee for consideration.

category / area classification			<p>Thursday. 1am - Friday and Saturday</p> <p>I understand that the guidance is only that and each application will be considered on its own merit. I therefore especially urge that the guidance is for early closing so that late closing is considered an exception and will then require especial demonstration by the applicant that good practice will be adhered to.</p>	
Section 7 – Prevention of Crime and Disorder – The proposal to incorporate suggested appropriate operating hours based on premises category / area classification	Gladys Hammond, Health Checks Outreach Nurse	Lambeth & Southwark Public Health, 160 Tooley Street, PO Box 64529, London, SE1P 5LX	<p>I am an outreach nurse for the NHS Health Checks Programme. I carry out health checks on Southwark residents. An important part of the health check is to do an ‘alcohol assessment’ (I use the FAST tool which is a nationally recognised tool for assessing harmful levels of alcohol consumption). I am concerned about the numbers of people that I am seeing who are drinking unhealthy amounts of alcohol. During April-December 2014, 4535 people completed a FAST screening assessment and 660 (11%) were shown to be drinking in excess of normal limits.</p> <p>I would very much like to see tighter controls on the number of small shops selling alcohol and the numbers of drinking establishments. There are town centres and high streets in Southwark where it seems to me there are too many opportunities to drink too much – in particular I am referring to parts of Walworth Road, Peckham, Camberwell and the Borough High Street / Tooley Street / Tower Bridge Road area.</p> <p>Your document proposes closing hours. These hours are too late. I do not support the proposed hours and would like to see sensible closing times for selling alcohol e.g. 11pm on weekdays and midnight at weekends for bars and restaurants. I understand that there will be ‘special occasions’ and like everyone else I like to celebrate but would like to think that this is an ‘exception’ and not every day. I also do not support early morning times for selling alcohol – it is certainly unhealthy if you need to have a drink at breakfast time!</p>	The support for the inclusion of appropriate operating hours within the policy is noted, as is the comments made that the hours proposed are too late.
Section 7 – Prevention of Crime and Disorder – The proposal to incorporate	Mark Prickett, Environmental Protection Team	C/O Community Safety & Enforcement Division, 160 Tooley Street, PO Box 64529,	<p>EPT are not opposed to having opening hour guidance as part of the Licensing Policy, however do not agree with basing it on the area classification zones used in the planning department.</p> <p>EPT suggest the areas should be zoned in terms of amount of licensable activity in any area, street activity, level and nature of disturbance complaints. etc, similar to</p>	The comments on classification in respect of suggested appropriate opening hours are

<p>suggested appropriate operating hours based on premises category / area classification</p>		<p>London, SE1P 5LX</p>	<p>the existing criteria for distinguishing CIPs. Relevant opening hour guidance can then be adopted for active and/or problem areas.</p> <p>Example of breakdown of areas;</p> <ul style="list-style-type: none"> <li>• <i>CITY CENTRE: Bankside, Borough &amp; Borough High Street, London Bridge.</i></li> <li>• <i>MAJOR TOWN CENTRES: E&amp;C + Walworth, Peckham, Camberwell.</i></li> <li>• <i>DISTRICT TOWN CENTRES: Old Kent Road (Bricklayers Arms to Tesco), The Blue, Herne Hill, Lordship Lane, Surrey Quays, Canada Water</i></li> <li>• <i>LOCAL CENTRES: Dulwich, Nunhead</i></li> <li>• <i>RESIDENTIAL: All other.</i></li> </ul> <p>Much like applications made within saturation zones, EPT approve of the idea that if a licence application wants to operate beyond the guidance times, then the 'presumption to refuse' stance will held until adequately demonstrated by the applicant that operations will not be in contradiction of any of the 4 licensing objectives.</p>	<p>noted and will be reported to the sub-committee.</p>
<p>Section 7 – Prevention of Crime and Disorder – The proposal to incorporate suggested appropriate operating hours based on premises category / area classification</p>	<p>Gavin Blackburn, Senior Enforcement Officer on behalf of Planning Policy &amp; Enforcement</p>	<p>Chief Executive's Department, 160 Tooley Street, PO Box 64529, London, SE1P 5LX</p>	<p>The move away from a presumption of extended hours is welcome. The table in the introduction but not in the draft statement is a useful <u>guide</u> (although should not be definitive). A return to 2300 being the norm and hours beyond that being an exception would be welcome. How practical it will be to rein back hours on licences I don't know. The population of the borough is projected to increase, and more homes will be built within it, which means proximity to licensed premises will inevitably increase. It should not therefore be presumed that licensable activity that may have been acceptable in the past will continue to be in the future.</p>	<p>The support for inclusion of appropriate operating hours is noted, as is the proposal that these times should reflect of style opening hours. The comments will be reported to the licensing sub-committee for consideration.</p>
<p>Section 7 – Prevention of Crime and Disorder – The</p>	<p>Director of Public Health</p>	<p>Chief Executive's Department, 160 Tooley</p>	<p><b>Summary of response</b> Public Health's recommendations for amendments to the draft Statement of Licensing Policy are outlined below. The related evidence and supporting argument</p>	<p>The support for the inclusion of appropriate operating hours</p>

<p>proposal to incorporate suggested appropriate operating hours based on premises category / area classification</p>		<p>Street, PO Box 64529, London, SE1P 5LX</p>	<p>are given in more detail as appendices. In summary, Public Health recommends that:</p> <p>3. There is good evidence that the availability of alcohol and late closing times can lead to problematic alcohol consumption with associated health, anti social and crime concerns. Having clear guidance on closing times in the Statement of Licensing Policy is strongly supported. It is recommended that the applications applying these closing times should receive more favourable consideration (Appendix 2).</p> <p>4. Public health does not support the proposed closing times (based on Lambeth) and recommends that the closing times should instead be:</p> <ul style="list-style-type: none"> <li>• Public Houses and Bars 11pm - Sunday to Thursday; Midnight - Friday and Saturday</li> <li>• Nightclubs 1am - Sunday to Thursday; 2am – Friday and Saturday</li> <li>• Restaurants and Cafes 11pm - Sunday to Thursday; Midnight - Friday and Saturday</li> <li>• Off Licences 11pm – Monday to Sundays</li> </ul> <p>This recommendation for earlier closing times is based on the lessons and experience of other boroughs and the impact of their later closing times in areas with vibrant late night economies.</p>	<p>within the policy is noted, as are the recommendations for those timings. These will be reported to the licensing sub-committee for consideration.</p>
<p>Section 7 – Prevention of Crime and Disorder – The proposal to incorporate suggested appropriate operating hours</p>	<p>Ann Flynn, Development Manager Safeguarding Children Board</p>	<p>Southwark Safeguarding Children Board PO Box 64529 4th Floor Hub 1 160 Tooley Street London SE1P 5LX</p>	<p>I support the proposal on closing time guidance.</p>	<p>The support for the proposal on closing time guidance is noted.</p>

based on premises category / area classification				
Section 7 – Prevention of Crime and Disorder – The proposal to incorporate suggested appropriate operating hours based on premises category / area classification	John Brunton for the Herne Hill Society	The Herne Hill Society, PO Box 27845, London, SE24 8AX	<p>Whilst these provide a useful guide to applicants, the final document must make it clear that these closing times are only an indication of what might be acceptable in each category of location. It is important to stress that account must always be taken of the nature and characteristics of the area surrounding the premises under consideration as well as of the premises themselves. We note that paragraph 183 of the draft Statement of Licensing Policy also makes this point. However, in the interests of clarity and to ensure that applicants and others are fully aware of this caveat, we recommend that the statement be appended to the table of closing times, should it be decided to include this table either in the policy or any accompanying guidance.</p> <p>With regard to the suggested closing times as they relate to Herne Hill, local businesses and residents have suffered serious problems arising from activities associated with ‘Night clubs / high volume vertical; drinking’. Thankfully, because of action taken by Southwark, supported by residents and this Society, these problems have largely gone away. Neither we, nor residents nor local traders wish to see them return. Herne Hill shares many of the characteristics of ‘local centres and small shopping parades’ to the extent that we believe it should be treated as such with regard to closing times for establishments in the ‘night-clubs’ and ‘public house’ categories. Herne Hill should therefore be designated as an area where night clubs are considered inappropriate; and public houses etc should be required to close at midnight on all days.</p>	The support for the inclusion of appropriate operating hours within the policy is noted as are the comments regarding how applications might be individually considered and the commentary on Herne Hill. These comments will be provided to the licensing committee for consideration.
Section 7 – Prevention of Crime and Disorder – The proposal to incorporate suggested appropriate	Jon Abbott, Head of Regeneration (North)	Chief Executive’s Department, 160 Tooley Street, PO Box 64529, London, SE1P 5LX	This looks a reasonable approach to me which would balance the need to provide licensed venues to support growth and the economy with the need to protect residential amenity. As the intro to review of policy makes clear this is intended as guidance and there is scope to apply it flexibly in response to the individual circumstances of the site. As a consequence in the fringe areas of major town centres for example where residential uses may be more predominant the policy would allow decision makers to place more emphasis on the need to protect residential amenity.	The support for the proposal on closing time guidance is noted.

operating hours based on premises category / area classification				
Section 7 – Prevention of Crime and Disorder – The proposal to incorporate suggested appropriate operating hours based on premises category / area classification	Neil Kirby, Head of Regeneration (South)	Chief Executive's Department, 160 Tooley Street, PO Box 64529, London, SE1P 5LX	This looks a reasonable approach to me which would balance the need to provide licensed venues to support growth and the economy with the need to protect residential amenity. As the intro to review of policy makes clear this is intended as guidance and there is scope to apply it flexibly in response to the individual circumstances of the site. As a consequence in the fringe areas of Peckham town centre where residential uses may be more predominant the policy would allow decision makers to place more emphasis on the need to protect residential amenity and potentially adopt the old pub opening hours.	The support for the proposal on closing time guidance is noted.
Section 7 – The Prevention of Crime and Disorder – Licensed Hours	Councillor Adele Morris Cathedrals Ward Liberal Democrat Councillor Deputy Leader, Southwark Liberal Democrat Group Opposition Spokesperson for Regeneration. On behalf of Southwark Liberal democrat Group	c/o Members' Room 160 Tooley Street London SE1 2QH	We welcome the proposals to introduce suggested closing times. We would also welcome more co-ordinated working between the licensing and planning policy departments, given that the proposed policies in the New Southwark Plan support an increase in restaurant and bar applications in the areas where we already have saturation policies in place. This puts the planners/planning committee in a difficult position when it comes to approving new applications that have proposals for restaurants and bars, which may subsequently have difficulty obtaining a licence.	A full review of cumulative impact policies and their relationship to other strategy is proposed
Section 7 – Prevention of Crime and	Sally Slade, Trading Standards, Food Safety & Occupational Health	C/O Community Safety & Enforcement	<b>Designated premises supervisor / personal licence holders and authorisations for the retail sale of alcohol</b> – Paragraphs 176 – 180	Only one DPS may be named on a premises licence.

Disorder - DPS / Personal licence holders	& Safety Unit Manager	Division, 160 Tooley Street, PO Box 64529, London, SE1P 5LX	A statement that there are occasions where the authority require a dps to be on the premises at all times that and that this would require 2 dps to be appointed. That the dps must be fit and proper and have no previous history of poor management or contraventions. That they should not be 'illegal workers' or employ illegal workers.	Where there is a need for proper responsible cover to be provided within a premises at all times then the requirement must be for personal licence holders to be upon the premises at all times with a proper scheme of authorisation in place.
Section 7 – Prevention of Crime and Disorder – Entertainment involving striptease and nudity	Sally Slade, Trading Standards, Food Safety & Occupational Health & Safety Unit Manager	C/O Community Safety & Enforcement Division, 160 Tooley Street, PO Box 64529, London, SE1P 5LX	Reference to child sexual exploitation here	Noted. Additional content will be incorporated.
Section 7 – Prevention of Crime and Disorder – The sale and possession of smuggled, bootlegged or counterfeit products and the handling of	Sally Slade, Trading Standards, Food Safety & Occupational Health & Safety Unit Manager	C/O Community Safety & Enforcement Division, 160 Tooley Street, PO Box 64529, London, SE1P 5LX	Paragraph 192 – Include ... CDs, DVDs and pharmaceutical products  Last bullet 'can also be difficult to distinguish from the real thing but usually cheap. Redefine smuggled etc to include duty evaded and stolen	Noted. Additional content will be incorporated.

stolen goods				
Section 7 – Prevention of Crime and Disorder – The sale and possession of smuggled, bootlegged or counterfeit products and the handling of stolen goods	Paul Gander, Trading Standards Team Leader	C/O Community Safety & Enforcement Division, 160 Tooley Street, PO Box 64529, London, SE1P 5LX	Amend <ul style="list-style-type: none"> <li>• Bootlegged (duty evaded) foreign products brought into the UK in illegal quantities and / or resold in the UK</li> </ul> To <ul style="list-style-type: none"> <li>• Bootlegged products i.e. stock on which UK duty has not been paid (typically goods illegally imported from outside the UK or goods destined for export which have been diverted to the UK).</li> </ul>	Noted. Additional content will be added.
Section 7 – Prevention of Crime and Disorder – Compliance with other law	Gavin Blackburn, Senior Enforcement Officer on behalf of Planning Policy & Enforcement	Chief Executive’s Department, 160 Tooley Street, PO Box 64529, London, SE1P 5LX	Section 7 understandably majors on the Police involvement in preventing Crime and Disorder. I think a further heading is needed making it clear that the prevention of crime is an objective applicable to all legal compliance, not just alcohol licensing and therefore includes compliance with planning, environmental and consumer protection legislation as well.	Noted. Additional content will be incorporated.
Section 7 – Prevention of Crime and Disorder – Planning Stop Notices	Mark Prickett, Environmental Protection Team	C/O Community Safety & Enforcement Division, 160 Tooley Street, PO Box 64529, London, SE1P 5LX	A section covering the relationship with the Licensing Act and planning offences – for example if a planning stop notice has been served on a premises relating to entertainment use then a responsible authority would be preventing a ‘crime’ by refusing any/all subsequent applications made at that premises for licensable activity.	The comments are noted. Additional commentary on compliance with various consent regimes will be included.
Section 7 – The Prevention of Crime & Disorder – High caffeine drinks	James Barber Liberal Democrat Councillor for East Dulwich	c/o Members’ Room 160 Tooley Street London SE1 2QH	Section 7 starting page 34 - Have officers considered adding high caffeine drinks to the repertoire of restrictions? Various pieces of research have made it clear that selling caffeine energy drinks with alcohol is a recipe for disaster. The caffeine fix counters the affects that alcohol normally has of slowing peoples alcohol drinking. One study, led by Sean Barrett of Dalhousie University in Halifax, Canada, found that students consumed an average of 8.6 alcoholic drinks per session when	Comments noted. While the concern is recognised the licensing authority has no power to exert controls over

			mixing it with energy drinks, compared to 4.7 when they consumed alcohol alone. Amelia Arria of the University of Maryland in College Park led other research and concluded people drink more alcohol when they mix it with energy drinks. Other research came to similar conclusions and we know that excessive drinking results in alcohol fuelled crime and harm. See also Drug and Alcohol Review vol29 p.331	high caffeine drinks.
<b>Section 8 – Public Safety</b>				
Section 8 – Public Safety – Women’s Safety Charter	Mark Prickett, Environmental Protection Team	C/O Community Safety & Enforcement Division, 160 Tooley Street, PO Box 64529, London, SE1P 5LX	Women’s Safety Charter – recommend a link made to sex establishments within the borough.	The section on adult entertainments will be extended to incorporate references to child sexual exploitation and women’s safety.
<b>Section 9 – Prevention of Nuisance</b>				
Section 9 – Prevention of Nuisance – Appropriate location	Gavin Blackburn, Senior Enforcement Officer on behalf of Planning Policy & Enforcement	Chief Executive’s Department, 160 Tooley Street, PO Box 64529, London, SE1P 5LX	Section 9 toward the start of that section it would be helpful to advise that nuisance is best managed by being a consideration when selecting a site for licensable activities. Site selection and appropriateness for a licensable activity is key, because the impacts of licensed activity are not contained within a building, but inevitably have wider impacts as people travel to and from the site. Locating licensable activities in town centres on main roads well served by public transport will generally offer a better prospect of mitigating the impact of the activity, but each site will be considered on its own characteristics.	Comments noted and additional content will be incorporated into the final policy document.
Section 9 – Prevention of Public Nuisance – Model conditions	Mark Prickett, Environmental Protection Team	C/O Community Safety & Enforcement Division, 160 Tooley Street, PO Box 64529,	Condition 221 amend to – Preventing noise and vibration escaping from the premises into external areas and internally into neighbouring properties, including music, noise from plant and patrons.  New measure 230 - All speakers for the broadcast of sound within the premises shall be isolated from the structure of the premises by anti-vibration mountings or	Amendment and addition notes.

		London, SE1P 5LX	mats.	
Section 9 – Prevention of Public Nuisance – Model conditions	John Brunton for the Herne Hill Society	The Herne Hill Society, PO Box 27845, London, SE24 8AX	The second and seventh bullet points of paragraph 228 appear to allow music to be played outside the premises, with no requirements other than the music should cease either before or at 22.00. However, there must be circumstances where such music could cause serious upset and disturbance to people living nearby, at any time of the day or night. For example, someone living in a neighbouring property and wishing to enjoy the peaceful use of his or her garden could have that enjoyment blighted by noise coming from the adjacent licensed premises. This paragraph must include a statement to the effect that music may only be played outside provided it does not cause annoyance or disturbance to nearby residents, irrespective of the time.	Comments are noted and will be considered in the final revision.
Section 9 – Prevention of Public Nuisance – Model conditions – Preventing nuisance from within the premises	John Brunton for the Herne Hill Society	The Herne Hill Society, PO Box 27845, London, SE24 8AX	Though, in paragraph 230, entrance / exit lobbies are mentioned, to cover cases where such installations were not previously needed, the point would be usefully strengthened were the second bullet point amended to read ‘installation of entrance / exit lobbies and their management control ....’	Comments are noted and will be considered in the final revision.
Section 9 – The Prevention of Public Nuisance – model conditions	James Barber Liberal Democrat Councillor for East Dulwich	c/o Members' Room 160 Tooley Street London SE1 2QH	Page 54 paragraph 230. The first bullet point talks about having doors and windows closed during performances of licensable regulated entertainment. Further bullet points go not to describe acoustic double doors, etc. But framing the further bullet points with this first bullet point gives the impression that it applies where entertainment takes place. Can the first bullet point either be removed or at the very least go further down the list removing this limiting context. We have a real problem on Lordship Lane of premises not keeping doors shut and surrounding neighbours often in flats since prior to the much looser licensing regime since 2006 are seriously disturbed.	Comments are noted and will be considered in the final revision.
<b>Section 10 – The Protection of Children from Harm</b>				

Section 10 – The Protection of Children from Harm – Completion of operating schedules	Ann Flynn, Development Manager Safeguarding Children Board	Southwark Safeguarding Children Board PO Box 64529 4th Floor Hub 1 160 Tooley Street London SE1P 5LX	Statement to be added that if the protection from harm box is not completed then the application should not be accepted. Each application should have a comment on protecting children	Intent noted. This applies equally to all of the four licensing objectives. An applicant is able to decide within their risk assessment that additional controls are necessary under an objective but the next policy revision will reflect that leaving any box blank within the operating schedule is likely to result in representations being raised.
Section 10 – The Protection of Children from Harm – Challenge 25 / Chld sexual exploitation	Ann Flynn, Development Manager Safeguarding Children Board	Southwark Safeguarding Children Board PO Box 64529 4th Floor Hub 1 160 Tooley Street London SE1P 5LX	There needs to be enhanced links to mechanism for applicants to use eg Challenge 25 & Operation Makesafe	Challenge 25 as the appropriate test for age verification is promoted within the section on child protection matters. Operation Makesafe will be referenced in the final policy revision.
Section 10 – The	Paul Gander, Trading	C/O Community	To clarify the figures relate to <b>underage</b> test purchases at <b>retail</b> premises	Noted for

Protection of Children from Harm – The purchase and consumption of alcohol by children and young persons	Standards Team Leader	Safety & Enforcement Division, 160 Tooley Street, PO Box 64529, London, SE1P 5LX		discussion with trading standards.
Section 10 – The Protection of Children from Harm – The purchase and consumption of alcohol by children and young persons	Sally Slade, Trading Standards, Food Safety & Occupational Health & Safety Unit Manager	C/O Community Safety & Enforcement Division, 160 Tooley Street, PO Box 64529, London, SE1P 5LX	A statement on CSE especially as Para 250 only says drinking is associated with youth offending not vulnerability	Comments noted. Relevant references to child sexual exploitation will be made within the final policy revision.
Section 10 – The Protection of Children from Harm – Southwark Proof of age	Sally Slade, Trading Standards, Food Safety & Occupational Health & Safety Unit Manager	C/O Community Safety & Enforcement Division, 160 Tooley Street, PO Box 64529, London, SE1P 5LX	Use PAL London proof of age  Include a paragraph on the numbers of passports lost during nights out in pubs and clubs and its effect on national security	Comments noted. PAL will be referenced as will concerns over use of passports for purpose of age verification.
Section 10 – The Protection of Children from Harm – Test purchasing	James Barber Liberal Democrat Councillor for East Dulwich	c/o Members' Room 160 Tooley Street London SE1 2QH	Page 58 paragraph 251. Interesting to see the test purchase undertaken. The Standard Committee have reported ZERO use of RIPA during 2014. Does this mean all the number of the table to 2013/14 were undertaken in 2013 and zero in 2014?	Questions passed to the trading standards service for direct response
Section 10 – The Protection of	Ann Flynn, Development Manager	Southwark Safeguarding	If possible issues relating to child sexual exploitation need to be surfaced & explicitly named. Also a link to if you see a child do something and refer to the	Comments noted. Relevant

Children from Harm – Child Sexual Exploitation	Safeguarding Children Board	Children Board PO Box 64529 4th Floor Hub 1 160 Tooley Street London SE1P 5LX	multi agency safeguarding hub 0207 525 1921 and out of hours 0207525 5000.  Police may be able to suggest implications if children are sexually exploited on the applicants premise. There are new orders to protect children following Rotherham etc and these may helpfully be included.	references to child sexual exploitation will be made within the final policy revision.
Section 10 – The Protection of Children from Harm – LGBT issues	Ann Flynn, Development Manager Safeguarding Children Board	Southwark Safeguarding Children Board PO Box 64529 4th Floor Hub 1 160 Tooley Street London SE1P 5LX	Develop at least one link to LGBT to enable applicants to think through issues for potentially vulnerable customers.	Noted.
<b>Section 11 – Enforcement</b>				
Section 11 – Enforcement – General	Dr Yvonneke Roe. Local GP and Chair of the Resilient Communities & Prevention Programme Board	Southwark NHS, Clinical Commissioning Group & Member of the Health and Wellbeing Board	<b>Enforcement</b> – I welcome the enforcement aspects highlighted in the draft document and the commitment from Southwark Council to take enforcement action against underage sales and sales of counterfeit or smuggled tobacco.  I strongly support intelligence led enhanced proactive test purchasing particularly in geographical areas that are most affected by illegal sales.	Comments noted. Trading standards operates under age test purchasing based on intelligence.
Section 11 – Enforcement – Business support	Gavin Blackburn, Senior Enforcement Officer on behalf of Planning Policy & Enforcement	Chief Executive’s Department, 160 Tooley Street, PO Box 64529, London, SE1P 5LX	Under Enforcement at paras 282 at 283 you refer to induction training and provision of advice intended to prevent licensing breaches occurring, perhaps that should be given greater prominence. I think there could be a role for a brief introduction to the planning system at such events. I’d be happy to attend if invited to give a short talk and be on hand to answer questions.	Induction sessions will be developed to include introduction to planning system.

<b>Section 12 – Contact Details</b>				
Section 12 – Contact details	Mark Prickett, Environmental Protection Team	C/O Community Safety & Enforcement Division, 160 Tooley Street, PO Box 64529, London, SE1P 5LX	<p><b>Updated contact details</b></p> <ul style="list-style-type: none"> <li>The Environmental Protection Team (the “responsible authority” dealing with the prevention of public nuisance’</li> <li>Noise and Nuisance Team – Providing the council’s 24 hour rapid response service. Tel: 020 7525 5777 <a href="mailto:noiseandnuisance@southwark.gov.uk">noiseandnuisance@southwark.gov.uk</a> <a href="http://www.southwark.gov.uk/info412/noise_problems">www.southwark.gov.uk/info412/noise_problems</a></li> <li>Southwark Events Team 0207 525 2000 <a href="mailto:events@southwark.gov.uk">events@southwark.gov.uk</a> <a href="http://www.southwark.gov.uk/planninganevent">www.southwark.gov.uk/planninganevent</a></li> </ul>	Noted.
<b>General</b>				
General - Inclusion of model conditions intended to reduce alcohol related harm	Dr Yvonneke Roe. Local GP and Chair of the Resilient Communities & Prevention Programme Board	Southwark NHS, Clinical Commissioning Group & Member of the Health and Wellbeing Board	Finally, I welcome the highlighting of mandatory and model conditions in the document. While I understand that health is not a licensing objective, I believe that it is entirely possible to include model conditions that can reduce alcohol related harm under the existing 4 licensing objectives. I would welcome an opportunity to work with you to do this, jointly with public health colleagues and the Resilient Communities & Prevention Programme Board.	The offer is noted with interest. As public health is not currently a licensing objective there remains restrictions on the levels of controls that can be exerted. However, a conversation is welcomed.
General – layout and arrangement of policy	Director of Public Health	Chief Executive’s Department, 160 Tooley Street, PO Box	<p><b>Summary of response</b></p> <p>Public Health’s recommendations for amendments to the draft Statement of Licensing Policy are outlined below. The related evidence and supporting argument are given in more detail as appendices. In summary, Public Health recommends</p>	The report back to the licensing sub-committee will incorporate those areas where the

		64529, London, SE1P 5LX	<p>that:</p> <p>5. The draft statement meets many ‘best practice’ criteria. However there are some areas for further consideration. They are highlighted in the table presented in Appendix 4.</p> <p>6. The consultation also asks if the draft policy is clear and easy to understand. All London policies were reviewed as part of a recent exercise. Islington’s and the City of London’s policies stand out as being particularly clear and easy to understand. It is suggested that some consideration is given to the layout, design and editing of the final document so that:</p> <ul style="list-style-type: none"> <li>• Individual key policies are highlighted</li> <li>• Followed by reasoned justification</li> <li>• For clarity the mandatory conditions and the model conditions or good practice measures (against the 4 licensing objectives) can be included as 2 separate appendices. This will help the navigation through what is currently a lengthy document.</li> </ul>	<p>review of London authority policies has recommended areas for improvement.</p> <p>Consideration will also be given to the layout, design and editing of the final policy document along the lines of the Islington / City of London policies.</p>
General – Enforcement / Late Night levy	Councillor Adele Morris Cathedrals Ward Liberal Democrat Councillor Deputy Leader, Southwark Liberal Democrat Group Opposition Spokesperson for Regeneration. On behalf of Southwark Liberal Democrat Group	c/o Members’ Room 160 Tooley Street London SE1 2QH	We are concerned that the "needs" of the businesses are always put first and that dealing with noise disturbance to local residents remains a low priority. We would like to see the Council use some of the powers granted to it by the Government - such as the late night levy - to pay for extra enforcement.	The Home Office is currently giving consideration to amending the late night levy process. The position is being monitored and will be reported to members in due course
General comment	John Brunton for the Herne Hill Society	The Herne Hill Society, PO Box 27845, SE248AX	The document is comprehensive, clearly set out and will be a useful resource for anyone wishing to make a licence application; and for local residents and organisations evaluating and drawing up responses to such applications.	Comments are noted.

Part Two - Summary of responses to online questionnaire provided for easy response							
No	Question	No responded	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree
1	The policy is clear and easy to understand	6	33.0%	33.0%	16.5%	16.5%	0%
2	The policy is balanced, fair and reasonable	6	33%	33%	16.5%	16.5%	0%
No	Question	No responded	Strongly support	Support	Neither support nor oppose	Oppose	Strongly oppose
	Please indicate the extent to which you support the approach taken by the licensing authority and partnership agencies						
3	To the first licensing objective – the prevention of crime and disorder	6	33%	67%	0%	0%	0%
4	To the second licensing objective – public safety	6	33%	49.5%	16.5%	0%	0%
5	To the third licensing objective – the prevention of nuisance	6	33%	67%	0%	0%	0%
6	To the fourth licensing objective – the protection of children from harm	6	33%	67%	0%	0%	0%
7	Please indicate the extent to which you agree that the approach taken by the council and partnership agencies to enforcement is proportionate, balanced, consistent and fair	6	33%	67%	0%	0%	0%
8	Please indicate the extent to which you support the continuation of the Borough and Bankside cumulative impact policy	6	82.5%	0%	0%	16.5%	0%
9	Please indicate the extent to which you support the continuation of the Camberwell cumulative impact policy	6	50%	16.5%	0%	33%	0%
10	Please indicate the extent to which you support the continuation of the Peckham cumulative impact policy	6	50%	0%	0%	50%	0%
11	Please indicate the extent to which you support the inclusion of suggested appropriate closing times within the policy	6	67%	33%	0%	0%	0%
12	Please indicate the extent to which you support the closing times suggested under the consultation	6	33%	33%	0%	33%	0%

**Part 3 - Safe Sociable London Partnership – Called in for Review – London Statement of Licensing Policies – Lessons Learnt and Future Development – Areas Where the Southwark Statement of Licensing Policy Could be Strengthened (December 2014)**

Question	Comment by SSLP	Response
Q4 – Does the policy give guidance on licensing hours?	There is not specific guidance on hours. Applications in more densely populated areas may have stricter controls with regard to noise control. Generally shops, stores and supermarkets will be permitted to provide alcohol within business hours.	The consultation on the revised draft Southwark policy addresses this by considering the inclusion of appropriate operating hours. This matter will be given specific consideration by the council’s licensing committee.
Q16 – Are methods mentioned to evaluate the effectiveness of the policy?	No	While this may not be specifically addressed the licensing committee receives an annual analysis from the partnership of alcohol related harm within Southwark. This analysis reports on alcohol related violence; anti-social behaviour; and the costs of alcohol harm. This analysis is supplemented by periodic analysis of nuisance complaints across the borough from the environmental protection team. This regular reporting provides the licensing committee with capacity to monitor the impact of its licensing decisions across the borough.
Q23 – Does the policy mention the criteria they will take into account when proposing an Early Morning Restriction Order (EMRO)?	No	This is the first policy revision since the full introduction of Early Morning Restriction Orders. Content will be incorporated within the policy revisions on EMROs on this occasion.
Q24 – Are there provisions specific reduce likelihood of crime and disorder at High Volume Vertical Drinkers (HVVD)?	No	Southwark has few premises which fall into this classification. However, the omission is recognised and is addressed within the policy revision.
Q24e – Does the policy recommend applicants to consider an appropriate ratio of tables and chairs?	No	This matter will be given consideration within the policy revision.

Q25 – Does the policy make provisions for a late night levy (LNL)?	No	Again this policy revision is the first since the introduction of the potential for raising a late night levy. Additional content will be incorporated within the policy revision on late night levys.