

## APPENDIX C

### OTHER PERSON A

Representation regarding license application 873987

PEACE & RIOT 12 CROXTED ROAD SE21 8SP

[REDACTED]

[REDACTED]

[REDACTED]

I am against this application because the provision of the sale and consumption of alcohol at this address is likely to cause a PUBLIC NUISANCE.

The premises concerned are adjacent to private residential flats (immediately above it) and a residential house to the East immediately adjacent to the outdoor area (this is my property) where drinks are likely to be consumed after the last serving at 23.00 hours.

This is likely to cause a **NOISE NUISANCE** during unsociable hours i.e. after 23.00 hours. A concession would be to reduce the serving hours to 22.00 hours.

[REDACTED]

8<sup>th</sup> January 2021

**From:** [REDACTED]  
**Sent:** Monday, February 22, 2021 10:30 AM  
**To:** Heron, Andrew  
**Cc:** [REDACTED]  
**Subject:** Re: Peace and Riot - 12 Croxton Road

Dear Mr Heron

Regarding this statement from Peace & Riot, I cannot consider withdrawing my objections until the meaning of part of their statement under the heading Metropolitan Police is clarified.

I do not know whether it means that the external area can only be used for 5 smokers during the specified times or whether it means that outside the specified times it can only be used for 5 smokers. The first alternative does not make much sense and the second alternative is odd because surely it does not mean that 5 smokers can sit out there all night.

The provision should state that no one should use the outside area outside these times.

I would also like clarification of what the Members only club in the basement would entail as this has not been mentioned before.

[REDACTED] I would welcome a direct dialogue with the Applicant. Please pass on my contact details.

Regards

[REDACTED]  
[REDACTED]  
[REDACTED]

**OTHER PERSON A  
RESPONSE**

**From:** Niall McCann [REDACTED]  
**Sent:** Tuesday, February 23, 2021 11:19 AM  
**To:** [REDACTED]  
**Cc:** Heron, Andrew  
**Subject:** RE: Peace and Riot - 12 Croxton Road

Dear [REDACTED]

Thank you for your email to Mr Andrew Heron. By way of introduction, I am the solicitor for the applicant.

The statement under the heading 'Metropolitan Police' were conditions suggested by the Metropolitan Police and agreed by the Applicant. As the Applicant has no intention of allowing smokers in the garden after those times it is happy to restrict the condition further so that it reads:

**"The external area will be out of use by patrons between 22:00 and 09:00 Sunday to Thursday and 22.30 and 09.00 Friday and Saturday, with all outdoor furniture rendered unusable 15 minutes after these times each day."**

I am copying in Mr Andrew Heron to ascertain whether this can be amended without agreement from the Metropolitan Police.

The reference to members is that, in the future, the Applicant might want to offer a membership scheme whereby, for a monthly fee, you are offered a discount and the chance to partake in private classes in the basement of yoga and the like. Currently, this is simply an idea and, in any case, will be very much secondary to the use of the premises as a family friendly café and restaurant.

I hope that the above eases your concerns and I should be grateful for your feedback. If you prefer, my client could give you a call to discuss?

Kind regards,

Niall McCann

**OTHER PERSON B**

**From:** [REDACTED]  
**Sent:** Monday, January 4, 2021 2:53 PM  
**To:** Regen, Licensing <[Licensing.Regen@southwark.gov.uk](mailto:Licensing.Regen@southwark.gov.uk)>  
**Subject:** licence number: 873987

Dear Sir/Madam

[REDACTED]

The above application is for no. 12 Croxted Road which is situated on the corner of Ildersly Grove.

The proposed OUTDOOR rear garden of the proposed restaurant adjoins my neighbour's rear garden.

A licence to sell alcohol until 11pm will mean outside noise until gone midnight before customers have all departed.

This noise is going to travel across my neighbour's garden into mine and beyond.

Ildersly Grove is populated mostly by older residents, as well as some families with young children, for both of whom, the peaceful nature of the road is a treasured asset. It is also a significant factor in their property value which will be adversely impacted by the noise level.

The proposed licence will constitute a public nuisance and so I object accordingly.

I also believe it is unacceptable that no notification has been delivered to the residents, thereby trying to avoid objections. It is only by walking past the premises that I became aware of the alcohol licence application. I have already objected to the rear garden application for the same reasons; alcohol will only exacerbate the noise levels.

I would appreciate an acknowledgement of my objection and transparent visibility of its consideration, as well as an explanation as to why we have not had the courtesy of written notification as impacted residents.

Kind regards

[REDACTED]

**OTHER PERSON C**

**From:** [REDACTED]  
**Sent:** Monday, January 4, 2021 6:34 PM  
**To:** Regen, Licensing <[Licensing.Regen@southwark.gov.uk](mailto:Licensing.Regen@southwark.gov.uk)>  
**Subject:** REPRESENTATION REGARDING LICENSE APPLICATION  
873987PEACE & RIOT 12 CROXTED ROAD SE21 8SP

[REDACTED]  
[REDACTED]  
[REDACTED]

I am against this application because the provision of the sale and consumption of alcohol at this address is likely to cause a PUBLIC NUISANCE.

The premises concerned are adjacent to private residential flats (immediately above it) and a residential house to the East immediately adjacent to the outdoor area. If the application for the removal of condition 7 (Usage of external areas) Reference no. 20/AP/3372 is agreed by the council (which the residents of Ildersly Grove have objected to) then the situation will be intolerable as drinks will be consumed in the garden area and are likely to be consumed after the last serving at 23.00 hours. This is likely to cause a **NOISE NUISANCE** during unsociable hours i.e. after 23.00 hours. Regardless of the usage of the garden area if an alcohol licence is granted to the proposed restaurant then the serving hours must be reduced to 10pm at the very latest.

**From:** [REDACTED]  
**Sent:** Saturday, February 20, 2021 1:59 PM  
**To:** Heron, Andrew  
**Subject:** Re: Peace and Riot - 12 Croxton Road

Response to the statement from Peace and Riot.

I'm sorry this does not begin to meet the objections I raised in several responses. The whole development will create problems of noise, parking etc changing the whole nature of the quiet residential road we live in. Residents are totally opposed to it as you will be aware from previous applications to do with this proposed development. The statement from Peace and Riot proposes several things that make the whole proposal even more objectionable to residents. Examples are allowing up to 48 people in the garden which is adjacent to 2B Ildersly Grove - this suggests that proposals for using the garden may well include events such as parties and weddings very different from the tone of earlier statements about the garden; Where has the idea of a members club come from? This has never been mentioned before?; Why are 5 smokers allowed to be in the garden between 22:00 and 09:00 Sunday to Thursday and 22.30 and 09.00 Friday and Saturday why ? what will they be doing during these hours?

This statement from Peace and Riot rings more alarm bells and does not meet objections

[REDACTED]  
[REDACTED]  
[REDACTED]

**OTHER PERSON D**

**From:** [REDACTED]  
**Sent:** Monday, February 1, 2021 6:07 PM  
**To:** Regen, Licensing <[Licensing.Regen@southwark.gov.uk](mailto:Licensing.Regen@southwark.gov.uk)>  
**Subject:** Application No 873987 - Peace + Riot, 12 Croxted Road London SE218SP

Please see attached the representation by The Dulwich Society together with an Extract of the Minutes of the Meeting of the Society's Executive Committee held by Zoom on January 18th 2021 authorising me to make this representation.

[REDACTED]  
[REDACTED]  
[REDACTED]

[REDACTED]

**Licensing Application No :873987      Peace + Riot, 12 Croxted Road , London  
SE21 8SP**

1. Having considered the above Application for a premises licence , the Dulwich Society objects to the Application.
2. The Applicant , Play Plus Time Limited, does not make clear in the Application whether they propose to operate Peace + Riot as a restaurant open to the general public, or as a private members' club.

The Change of Use Application for the premises submitted to Southwark Planning Department by Messrs Daniel Watney on behalf of The Dulwich Estate on 7<sup>th</sup> April 2020 describes the prospective use of the property by the tenant Peace + Riot , as :

*“A niche restaurant catering for adults and simultaneously offering bespoke high -quality childcare ( with a child friendly menu offer) during the course of a meal or snack. The concept is designed to provide an adult restaurant experience with high quality and reliable childcare on site. ”.*

In contrast, extracts from publicity material on the internet describe Peace + Riot as:

*“a new concept in family space “ ...where parents can “ Eat, drink, work and chat – all with childcare – Our Peacekeepers work just as home helps would , except you’re not at home ”;*

*“ a members bar during the evening ”.*

*“Peace + Riot’s first site opens in Spring 2021 in Dulwich, South East London with further sites opening across the country. To become a Founder Member, sign up to the mailing list at [www.peaceandriot.co](http://www.peaceandriot.co) and get first dibs on reduced membership rates ( full yearly memberships start at £250 per household).”*

3. Furthermore , the information provided in the Application as to the steps the Applicant proposes to take to promote the licensing objectives i.e., *“Nothing beyond existing health and safety/ fire safety etc requirements”* , are wholly inadequate in addressing the 4 objectives.
4. The Society believes that this Application should be withdrawn and a new Application be submitted, clearly setting out the nature of the business and the steps to be taken to promote the licensing objectives. The Society reserves the right to submit a further representation on any new Application.
5. Any licence granted should contain conditions to ensure that :

Maximum number on the premises at any one time ( not including staff) shall be [ ]

The terminal hour for sale of alcohol shall be at least 30 minutes before closing time;

No licenseable activity in the garden area after 22.00 (21.00 Sundays).

Children under 16 should be accompanied by an adult.

All staff members (described in promotional material as "Peacekeepers") who undertake childminding duties must have undergone an Enhanced DBS check.

The Dulwich Society  
February 1<sup>st</sup> 2021

Extract of Minutes the Dulwich Society Executive Committee held by Zoom on  
January 18<sup>th</sup> 2021

The Committee considered details of application No : 873987 by Play Plus Time Limited for a premises licence at 12 Croxton Road London SE21 8SP . They considered that the Application was silent as to whether the Applicant proposed to operate "Peace+ Riot" as a restaurant open to the public or as a private members club as the Applicant's internet publicity material suggested. Furthermore they felt that the Application failed to address how the Applicant proposed to promote any of the four licensing objectives.

It was unanimously resolved that [REDACTED] submit a representation opposing this Application on behalf of the Society.

[REDACTED] ( Secretary)