APPENDIX 1: Lambeth Statement of Licensing Policy 2019-2024
Public consultation outcomes

A. Public consultation: online survey

1. Demographic analysis of consultees who responded to the online survey

1.1. Of the 108 responses to the online consultation:

- 90 respondees are residents of Lambeth who are not connected to a licensed premises through employment or ownership.
- 3 respondees are Lambeth residents who are connected to a licensed premises through employment or ownership,
- 5 respondees are Lambeth non-residents who work in the borough,
- 2 respondees are Lambeth non-residents who socialise in the borough,
- 8 respondees who categorised themselves as ‘other’ – these included individuals responding on behalf of themselves and also on behalf of any organisations or they represent including: Public Health England London, Alcohol, Drugs and Tobacco Team; Norwood Action Group; 2 Ward Councillors; The Friends of Kennington Park.

The majority of respondents (96 out of 108) to the online survey stated that they are Lambeth residents.

1.2. Regarding gender identity: 52 stated that they were a ‘woman (including trans woman)’; 44 stated that they were a ‘man (including trans man)’; 10 others stated that they preferred ‘not to say’ and 2 did not answer this question.

1.3. The 103 consultees who responded to the online survey and who answered this question stated their age as follows:

<table>
<thead>
<tr>
<th>Age group</th>
<th>Number</th>
</tr>
</thead>
<tbody>
<tr>
<td>18-24</td>
<td>1</td>
</tr>
<tr>
<td>25-34</td>
<td>11</td>
</tr>
<tr>
<td>35-44</td>
<td>27</td>
</tr>
<tr>
<td>45-54</td>
<td>27</td>
</tr>
<tr>
<td>55-64</td>
<td>22</td>
</tr>
<tr>
<td>65-74</td>
<td>15</td>
</tr>
<tr>
<td>75-84</td>
<td>0</td>
</tr>
<tr>
<td>85+</td>
<td>0</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>103</strong></td>
</tr>
</tbody>
</table>

1.4. Regarding health and disability status: 83 stated that their day to day activities were not limited due to a health problem or disability which has lasted or is expected to last at least 12 months. 6 respondents stated that they preferred ‘not to say’. 12 consultees stated that their day to day activities were limited ‘a little’ (12) or ‘a lot’ (2).
1.5. Where stated by the consultees, 13 responded that they had caring responsibilities and 92 responded that they had no caring responsibilities.

1.6. Of the 85 consultees who stated their ethnicity for the purposes of the online survey, the breakdown is set out in Table 2, below.

Table 2: Stated ethnicity of respondents to online survey:

<table>
<thead>
<tr>
<th>Ethnicity</th>
<th>Number</th>
</tr>
</thead>
<tbody>
<tr>
<td>White: British</td>
<td>62</td>
</tr>
<tr>
<td>White: Irish</td>
<td>2</td>
</tr>
<tr>
<td>Other White background</td>
<td>7</td>
</tr>
<tr>
<td>Black or Black British: Caribbean</td>
<td>3</td>
</tr>
<tr>
<td>Black or Black British: African Somali</td>
<td>1</td>
</tr>
<tr>
<td>Black or Black British: Other Black background</td>
<td>1</td>
</tr>
<tr>
<td>Mixed: White and Asian</td>
<td>2</td>
</tr>
<tr>
<td>Other mixed background</td>
<td>2</td>
</tr>
<tr>
<td>Asian or Asian British: Indian</td>
<td>2</td>
</tr>
<tr>
<td>Asian or Asian British: Bangladeshi</td>
<td>1</td>
</tr>
<tr>
<td>Latin American</td>
<td>1</td>
</tr>
<tr>
<td>Prefer not to say</td>
<td>21</td>
</tr>
<tr>
<td>White Chinese</td>
<td>1</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>106</strong></td>
</tr>
</tbody>
</table>

1.7. The majority of consultees who responded to the question on their religious beliefs stated that they were Atheist (30). The other consultees who responded to this question stated that they were Christian (24); Agnostic (11); ‘Other’ (3); Hindu (2); Muslim (2); Buddhist (1); Jehovah’s Witness (1) or Jewish (1). 24 stated that they preferred ‘not to say’.

1.8. Table 3: Stated sexual orientation of respondents to online survey:

<table>
<thead>
<tr>
<th>Sexual orientation</th>
<th>Number</th>
</tr>
</thead>
<tbody>
<tr>
<td>Heterosexual (straight)</td>
<td>54</td>
</tr>
<tr>
<td>Gay or lesbian (homosexual)</td>
<td>16</td>
</tr>
<tr>
<td>Bisexual</td>
<td>3</td>
</tr>
<tr>
<td>Asexual</td>
<td>0</td>
</tr>
<tr>
<td>Other</td>
<td>1</td>
</tr>
<tr>
<td>Prefer not to say</td>
<td>30</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>104</strong></td>
</tr>
</tbody>
</table>

1.9. The key aspects that are of note regarding the demographic analysis of consultees who responded to the online survey are that:

a) The responses primarily came from Lambeth residents who are not employees or owners of licensed premises.
b) The ethnicity of the respondents who answered the ethnicity question is not reflective of the wider ethnic diversity within Lambeth.

2. **Online survey: Responses to multiple choice questions**

2.1. **Overview**

The online survey consisted of 19 questions (in addition to the demographic questions as referred to above) which included a combination of multiple-choice questions with the option, in some cases, of providing free text responses. A further question in the online survey invited respondents to state whether anything they felt anything was missing from the draft document ('Is there anything that is missing from the new Licensing Policy that you would like to see included?'). Results in relation to the multi-choice questions are set out below.

The responses are largely balanced: there are not many areas where a view is overwhelmingly in agreement or disagreement. The written and free-text submissions (details of which are set out in 3. of Section A of this Appendix) allow for better understanding of these responses.

A question was also included on whether there was anything not included in the draft policy that should be included. Responses to this have been included in the analysis of free text responses in 3. of Section A of this Appendix.

2.2. **Online survey results**

Table 4: Multiple choice questions, responses and analysis

| 1. | To what extent do you agree or disagree that The Licensing Policy will address these licensing objectives?[^1] \n|---|---|---|---|---|---|---|---|
| | Strongly agree | Agree | Neither agree nor disagree | Disagree | Strongly disagree | Don't know |
| | 11 | 37 | 15 | 17 | 23 | 5 |

The slight majority of the responses agreed or strongly agreed with this multi-choice question.

2. | To what extent do you agree or disagree that The Licensing Policy will contribute to Lambeth’s aspirations

| | Strongly agree | Agree | Neither agree nor disagree | Disagree | Strongly disagree | Don't know |
| | 7 | 25 | 18 | 25 | 26 | 7 |

A slight majority of responses disagreed or strongly disagreed with this multi-choice question.

3. | To what extent do you agree or disagree that the Licensing Policy is accessible and easy to read?

| | Strongly agree | Agree | Neither agree nor disagree | Disagree | Strongly disagree | Don't know |
| | 10 | 40 | 28 | 15 | 13 | 2 |

A majority of responses agreed or strongly agreed with this multi-choice question.

[^1]: *the prevention of crime and disorder; public safety; the prevention of public nuisance; and the protection of children from harm*
4. To what extent do you agree or disagree that the new Licensing Policy is clear around how the determination and regulation of licensing is carried out in Lambeth?

<table>
<thead>
<tr>
<th>Strongly agree</th>
<th>Agree</th>
<th>Neither agree nor disagree</th>
<th>Disagree</th>
<th>Strongly disagree</th>
<th>Don't know</th>
</tr>
</thead>
<tbody>
<tr>
<td>12</td>
<td>36</td>
<td>18</td>
<td>34</td>
<td>5</td>
<td>3</td>
</tr>
</tbody>
</table>

The slight majority of the responses agreed or strongly agreed with this multi-choice question.

5. To what extent do you agree or disagree that Lambeth has a good balance between the regulation of licensed business and the needs of residents?

<table>
<thead>
<tr>
<th>Strongly agree</th>
<th>Agree</th>
<th>Neither agree nor disagree</th>
<th>Disagree</th>
<th>Strongly disagree</th>
<th>Don't know</th>
</tr>
</thead>
<tbody>
<tr>
<td>3</td>
<td>28</td>
<td>21</td>
<td>20</td>
<td>31</td>
<td>2</td>
</tr>
</tbody>
</table>

A slight majority of responses disagreed or strongly disagreed with this multi-choice question.

6. To what extent do you agree or disagree that The Clapham High Street saturation zone has helped to reduce crime, nuisance and anti-social behaviour?

<table>
<thead>
<tr>
<th>Strongly agree</th>
<th>Agree</th>
<th>Neither agree nor disagree</th>
<th>Disagree</th>
<th>Strongly disagree</th>
<th>Don't know</th>
</tr>
</thead>
<tbody>
<tr>
<td>6</td>
<td>17</td>
<td>20</td>
<td>12</td>
<td>16</td>
<td>28</td>
</tr>
</tbody>
</table>

A slight majority of responses disagreed or strongly disagreed with this multi-choice question.

7. To what extent do you agree or disagree that Lambeth has a diverse, cultural entertainment offer to its residents and visitors

<table>
<thead>
<tr>
<th>Strongly agree</th>
<th>Agree</th>
<th>Neither agree nor disagree</th>
<th>Disagree</th>
<th>Strongly disagree</th>
<th>Don't know</th>
</tr>
</thead>
<tbody>
<tr>
<td>19</td>
<td>42</td>
<td>20</td>
<td>16</td>
<td>8</td>
<td>1</td>
</tr>
</tbody>
</table>

A majority of responses agreed or strongly agreed with this multi-choice question.

8. To what extent do you agree or disagree that the Licensing Policy is clear on the connections with the Mayor's Vision for London as a 24-hour City?

<table>
<thead>
<tr>
<th>Strongly agree</th>
<th>Agree</th>
<th>Neither agree nor disagree</th>
<th>Disagree</th>
<th>Strongly disagree</th>
<th>Don't know</th>
</tr>
</thead>
<tbody>
<tr>
<td>3</td>
<td>36</td>
<td>31</td>
<td>15</td>
<td>10</td>
<td>7</td>
</tr>
</tbody>
</table>

A slight majority of responses agreed or strongly agreed with this multi-choice question.

9. To what extent do you agree or disagree that the new Licensing Policy is clear on the process for applications?

<table>
<thead>
<tr>
<th>Strongly agree</th>
<th>Agree</th>
<th>Neither agree nor disagree</th>
<th>Disagree</th>
<th>Strongly disagree</th>
<th>Don't know</th>
</tr>
</thead>
<tbody>
<tr>
<td>12</td>
<td>43</td>
<td>20</td>
<td>18</td>
<td>6</td>
<td>8</td>
</tr>
</tbody>
</table>

A majority of responses agreed or strongly agreed with this multi-choice question.
10. To what extent do you agree or disagree that the Licensing Policy is clear on the expectations of the Council regarding Temporary Events, particularly those in public spaces?

<table>
<thead>
<tr>
<th>Strongly agree</th>
<th>Agree</th>
<th>Neither agree nor disagree</th>
<th>Disagree</th>
<th>Strongly disagree</th>
<th>Don't know</th>
</tr>
</thead>
<tbody>
<tr>
<td>9</td>
<td>40</td>
<td>14</td>
<td>25</td>
<td>9</td>
<td>9</td>
</tr>
</tbody>
</table>

A majority of responses agreed or strongly agreed with this multi-choice question.

11. To what extent do you agree or disagree that the Council’s preferred hours are a good fit for Lambeth?

<table>
<thead>
<tr>
<th>Strongly agree</th>
<th>Agree</th>
<th>Neither agree nor disagree</th>
<th>Disagree</th>
<th>Strongly disagree</th>
<th>Don't know</th>
</tr>
</thead>
<tbody>
<tr>
<td>6</td>
<td>23</td>
<td>14</td>
<td>26</td>
<td>30</td>
<td>7</td>
</tr>
</tbody>
</table>

A slight majority of responses disagreed or strongly disagreed with this multiple-choice question. This is a notable majority for disagreeing with this proposition, however, it is difficult to know whether the view is too restrictive or too liberal. Given the written and free-text commentary the current preferred hours do seem to be at the right level.

The following responses came with free text spaces for further comment. Further elucidation is included in the free text section in section 3 of this Appendix.

12. Do you feel that the measures that new applicants are required to demonstrate and to put in place which are set out in the new Licensing Policy are clear and reasonable?

<table>
<thead>
<tr>
<th>Yes</th>
<th>No</th>
<th>Don’t know</th>
</tr>
</thead>
<tbody>
<tr>
<td>36</td>
<td>36</td>
<td>29</td>
</tr>
</tbody>
</table>

The views on this expressed by respondents were evenly divided.

13. Is the draft Licensing Fees Policy reasonable and clearly stated?

<table>
<thead>
<tr>
<th>Yes</th>
<th>No</th>
<th>Don’t know</th>
</tr>
</thead>
<tbody>
<tr>
<td>39</td>
<td>15</td>
<td>49</td>
</tr>
</tbody>
</table>

Whilst the majority had no view, the majority of those expressing a view felt this was reasonable and clear.

14. Does the draft Outside Spaces Policy in the new Licensing Policy address potential issues around public nuisance in a reasonable and effective way?

<table>
<thead>
<tr>
<th>Yes</th>
<th>No</th>
<th>Don’t know</th>
</tr>
</thead>
<tbody>
<tr>
<td>20</td>
<td>25</td>
<td>16</td>
</tr>
</tbody>
</table>

The majority of respondents felt this policy did not adequately address the issue.

15. Should applicants be expected to identify and consider the impact on an area (including council and police resourcing) likely to be caused by their application?

<table>
<thead>
<tr>
<th>Yes</th>
<th>No</th>
<th>Don’t know</th>
</tr>
</thead>
<tbody>
<tr>
<td>67</td>
<td>17</td>
<td>20</td>
</tr>
</tbody>
</table>

The overwhelming majority of respondents supported this policy.

16. Does the draft Health Policy in the new Licensing Policy cover health concerns around Licensing in a reasonable way?
The overwhelming majority of respondents supported this policy.

17. **Does the draft policy on alcohol delivery services address all the areas that it should?**

<table>
<thead>
<tr>
<th></th>
<th>Yes</th>
<th>No</th>
<th>Don’t know</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>52</td>
<td>23</td>
<td>28</td>
</tr>
</tbody>
</table>

The majority of respondents did not have a view on this, although more respondents felt it addresses all the areas that it should.

18. **Is the draft policy on dispersal and entry in the new Licensing Policy clear and sufficient?**

<table>
<thead>
<tr>
<th></th>
<th>Yes</th>
<th>No</th>
<th>Don’t know</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>35</td>
<td>26</td>
<td>39</td>
</tr>
</tbody>
</table>

The majority of respondents did not have a view on this, although more respondents felt it did address all the areas it should than those who didn’t.

3. **Online survey: Free text responses**

3.1. In total, 251 elements of free text response were received for the consultation through the electronic survey from the 108 respondents who participated. These free text responses and comments ranged widely from general views in relation to the draft Statement of Licensing Policy (SLP) or specific aspects of the document, to detailed concerns relating to specific locations, venues or circumstances. The free text responses have been reviewed and where these relate to matters that are within the scope of the SLP, these have been assessed and incorporated as appropriate. Operational suggestions related in the main to Licensing practice and wider enforcement issues and approach, and although not taken forward for the purposes of this exercise, will be looked at separately.

3.2. The summary table of responses can be found below. The responses are categorised under twelve themes for ease of reference.

<table>
<thead>
<tr>
<th>Theme</th>
<th>REF</th>
<th>Comments</th>
<th>Response</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public space</td>
<td>OL1</td>
<td>[The Policy should] Promote the use of Public Space Protection Orders (PSPOs).</td>
<td>PSPOs relate to the Anti-social Behaviour, Crime and Policing Act 2014 and not the Licensing Act 2003 and are therefore outside the remit and scope of the Statement of Licensing Policy (SLP).</td>
</tr>
<tr>
<td>Hours</td>
<td>OL2</td>
<td>The policy is too vague on the use of public spaces.</td>
<td>The SLP does not cover the use of public spaces except where they are subject to a temporary event notice (TEN). It is not possible to cover public spaces in general within the document as this is not governed by the Licensing Act 2003 and therefore is outside the scope of the SLP.</td>
</tr>
<tr>
<td>Hours</td>
<td>OL3</td>
<td>Hours should be more restrictive.</td>
<td>The SLP aims to get the right balance between the needs of residents and the needs of businesses.</td>
</tr>
<tr>
<td>Theme</td>
<td>REF</td>
<td>Comments</td>
<td>Response</td>
</tr>
<tr>
<td>--------------------------------------------</td>
<td>------</td>
<td>--------------------------------------------------------------------------</td>
<td>----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>Theme REF Comments Response</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>OL4</td>
<td>2 am is too early for night clubs to close.</td>
<td>Where applicants feel that this is the case, they may state this in their application with the rationale and evidence for requesting hours which fall outside those recommended in the SLP.</td>
</tr>
<tr>
<td>Mayor of London's vision of London as a 24-hour city</td>
<td>OL5</td>
<td>The SLP does not align with this vision.</td>
<td>How the SLP aligns with the vision is now clarified in the SLP.</td>
</tr>
<tr>
<td></td>
<td>OL6</td>
<td>The vision is not conducive to the residents of Lambeth.</td>
<td>This is a wider comment about the Mayor of London’s vision. The SLP aims to get the right balance between the needs of residents and the needs of businesses.</td>
</tr>
<tr>
<td>Applications</td>
<td>OL7</td>
<td>Support for evidence to support applications.</td>
<td>A specific policy within the SLP relates to the process for applications.</td>
</tr>
<tr>
<td></td>
<td>OL8</td>
<td>Queries relating to whether the level of fees is appropriate.</td>
<td>The fees payable in respect of applications for new premises licences and club premises certificates; applications for full variations to premises licences and club premises certificates; and annual fees in respect of premises licences and club premises certificates vary depending on the national non-domestic rateable value (NNDR) “band” of the premises and are prescribed in regulations (the Licensing Act 2003 (Fees) Regulations 2005) i.e. the charging methodology is not determined by the Council but is set out in the relevant legislation.</td>
</tr>
<tr>
<td>Off licences</td>
<td>OL9</td>
<td>Restrictions on the promotion of high strength alcohol drinks, discouraging shop front displays of those alcohol products that are on promotional price offers and placing these at the back of the shop.</td>
<td>These would be matters for individual conditions. Appendix 1 of the SLP recommends that the following should be considered for premises selling alcohol for consumption off the premises: ‘Will there be a restriction on the sales/supplies of beers, ales, lagers or ciders or anything similar of 6% ABV [alcohol by volume] or above, excluding the sale of specialist branded alcoholic beverages’.</td>
</tr>
<tr>
<td></td>
<td>OL10</td>
<td>Supporting local NTE by encouraging use of on rather than off-licences.</td>
<td>This is outside the scope of the SLP.</td>
</tr>
<tr>
<td>Disabled access</td>
<td>OL11</td>
<td>More coverage of requirements to meet disabled access.</td>
<td>This has now been included in the policy on outside spaces.</td>
</tr>
<tr>
<td>Residential areas</td>
<td>OL12</td>
<td>More consideration [should be] given to residents.</td>
<td>The SLP aims to get the right balance between the needs of residents and the</td>
</tr>
<tr>
<td>Theme</td>
<td>REF</td>
<td>Comments</td>
<td>Response</td>
</tr>
<tr>
<td>-----------------------------------------------------------</td>
<td>-----</td>
<td>-----------------------------------------------------------------------------------------------</td>
<td>-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td><strong>Cumulative Impact Policy (CIP) Areas</strong></td>
<td>OL13</td>
<td>6 comments on the need for a CIP in Brixton.</td>
<td>Currently there has been no policy decision to create a new Cumulative Impact Policy (CIP) area and therefore this matter is not included in the SLP beyond the inclusion of wording on the existing CIP area in Clapham High Street. Any evidence arising from the evening and night-time economy report for Brixton in relation to a CIP for the area will be considered and, if relevant, incorporated in any SLP update.</td>
</tr>
<tr>
<td><strong>Anti-Social Behaviour</strong></td>
<td>OL14</td>
<td>One comment that the CIP section is not clear enough in terms of the true impact of CIPs.</td>
<td>The SLP provides the appropriate clarity on this – further clarity would be provided by any CIP undertaken where applicable.</td>
</tr>
<tr>
<td><strong>Sexual Entertainment Venues (SEVs)</strong></td>
<td>OL15</td>
<td>Needs more clarity on what licensees can do to minimise anti-social behaviour by patrons leaving their premises.</td>
<td>A prompt is provided in the SLP under Appendix 1. There is an expectation that dispersal of patrons is managed in an effective way and in order to promote the licensing objectives.</td>
</tr>
<tr>
<td><strong>Public Health</strong></td>
<td>OL16</td>
<td>Concerns raised about ASB and Street drinking.</td>
<td>This is an operational matter for specific localities – where specific locations have been cited this information has been passed on accordingly.</td>
</tr>
<tr>
<td><strong>Planning</strong></td>
<td>OL17</td>
<td>Noise concerns raised.</td>
<td>Issues raised regarding noise relating to specific premises are dealt with on an operational basis.</td>
</tr>
<tr>
<td><strong>Sexual Entertainment Venues (SEVs)</strong></td>
<td>OL18</td>
<td>Concerns of principle relating to SEVs</td>
<td>Sex establishments including SEVs are governed by separate legislation and must be licensed under the Local Government (Miscellaneous Provisions) Act 1982, as amended by the Policing and Crime Act 2009. A separate SEV Policy applies. Wording on SEVs has now been removed from the updated draft SLP document.</td>
</tr>
<tr>
<td><strong>Public Health</strong></td>
<td>OL19</td>
<td>Concern that this is not a licensing objective and should not be included as a consideration.</td>
<td>Under the legislation, public health is not a licensing objective in England and Wales (unlike in Scotland), although Public Health are a responsible authority under the Licensing Act 2003.</td>
</tr>
<tr>
<td><strong>Planning</strong></td>
<td>OL20</td>
<td>Should be greater recognition that Planning and Licensing work together more closely.</td>
<td>The SLP includes a commitment to work as closely as is possible and as appropriate within the confines of the different legislative regimes (see Section 2.7 of the SLP which states that: ‘It is understood that the Planning regime in Lambeth has an impact on the Licensing regime. It is also noted that each of these</td>
</tr>
</tbody>
</table>
3.3. There were a range of other comments from consultees that were either: a) too locally-specific or operationally-focused to respond to; or b) that were outside the scope of the SLP.

B. Public consultation: Substantive responses

1. Standalone substantive responses to the consultation were received from the 12 parties below:
   - The Brixton Society
   - Clapham BID ('This is Clapham')
   - Cllr Fred Cowell, Chair of Licensing Committee and Licensing Sub-Committee
   - Lambeth Council Licensing team
   - Lambeth Police
   - London Night Time Czar Amy Lamé
   - Multi Agency Reducing Harm from Alcohol Group
   - Norwood Forum
   - Safer Neighbourhood Panel Chairs
   - Sleepless in Brixton
   - SMW Cottages Residents’ and Tenants’ Association
   - Violence Against Women and Girls Team (Lambeth Council)

   These are summarised in Table 6 overleaf, with narrative on each point, and, where relevant, an indication is given as to whether/how comments are proposed as being incorporated into the updated draft Statement of Licensing Policy.

   1.1. Common themes include a desire for more synergies in practice between Planning and Licensing - this is currently constrained by the two separate legislative regimes - as also highlighted in the responses to the online survey; requests for specific guidance on processes (e.g. applications) – the majority of this information is online, however the application process is set out as a Policy in the SLP; and comments and suggestions regarding operational practices, which, although outside the scope of this policy refresh process, provide useful feedback and will be evaluated and taken on board where feasible, outside of this process.

   1.2. The 'Agent of Change' principle is not currently applicable but will be reviewed during any interim review of the Statement of Licensing Policy.

   1.3. Although the setting of the local Statement of Licensing Policy allows for some flexibility in content and approach, some areas and processes are determined by legislation and not by the Council, such as the parties who can object to a Temporary Event Notice, and the updated SLP will seek to make this clear in the final version of the document.
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<tbody>
<tr>
<td>The Brixton Society</td>
<td>Policies</td>
<td>B1</td>
<td>Policy 5 – outdoor spaces – welcomed and noted that this is an area of increasing concern for residents. In particular the pavements being blocked was noted.</td>
<td>No</td>
<td>Updated SLP seeks to address this issue and the response appears to support this stance.</td>
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<td>B2</td>
<td>Policy 6 – Temporary Events – request that applicants demonstrate that they have consulted local residents' groups to understand impact better, particularly in reference to large and outdoor events.</td>
<td>Yes</td>
<td>Wording now included as follows in SLP on TENs: ‘It is recommended that applicants for TENs that relate to large events, particularly large outdoor events, consult local residents’ groups before submitting their TENs application.’</td>
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<td></td>
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<td>B3</td>
<td>Policy 7 – Cumulative Impact – disappointed that Brixton is not being considered for a CIP</td>
<td>No</td>
<td>This is a matter for separate consideration and will not be covered in the new SLP. This may be incorporated into future version(s) subject to applicable processes being followed as set out in the legislation and Guidance.</td>
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<td>B4</td>
<td>Policy 8 – Hours of sale and location – strongly welcomed the 11 am starting hour preference and affirmed support for no proposed changes to closing times.</td>
<td>No</td>
<td>No action required as the response appears to support this area of the Policy.</td>
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<td>B5</td>
<td>Policy 13 – resource implications – welcomed and noted that litter resulting from the NTE is a major concern for them. Further to this, it is noted that Policy 13 could be extended to ensure that new applicants should be able to demonstrate</td>
<td>Yes</td>
<td>New wording now included: ‘Applicants are expected to demonstrate in their application that they have identified and taken into account any implications as above and to set out how they will mitigate against these’.</td>
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<td>an understanding of the impact of their venue on public resources.</td>
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<td>B6</td>
<td>Policy 15 – delivery services – welcomed and particular support for the ban on delivery to public spaces.</td>
<td>No</td>
<td>No action required as the response appears to support this area of the SLP.</td>
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<td>B7</td>
<td>Policy 16 – dispersal and entry – welcomed and noted that action should be taken by the Council where issues arise.</td>
<td>No</td>
<td>No action required as the response appears to support this area of the SLP.</td>
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<td></td>
<td>Section2. Scope of the Policy &amp; Appendix 12</td>
<td>B8</td>
<td>Noted that the Mayor’s 24-Hour Vision for London does need to be aligned with local needs.</td>
<td>No</td>
<td>No action undertaken as the response appears to support the wording in this area of the draft SLP.</td>
</tr>
<tr>
<td>Clapham BID ('This is Clapham')</td>
<td>General</td>
<td>CB1</td>
<td>Note the document is easy to read and clear.</td>
<td>No</td>
<td>No action required re SLP.</td>
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<td></td>
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<td>CB2</td>
<td>Note the support for a well-run vibrant Night Time Economy.</td>
<td>No</td>
<td>No action required re SLP.</td>
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<td>CB3</td>
<td>Note support for the alignment with the Mayor’s Vision for London as a 24-Hour City and understand the need to balance this with the needs of local residents.</td>
<td>No</td>
<td>No action undertaken as the response appears to support the wording in this area of the draft SLP.</td>
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<td>CB4</td>
<td>Support the commitment to partnership working and the acknowledgement of the BIDs’ role.</td>
<td>No</td>
<td>No action undertaken as the response appears to support the wording in this area of the draft SLP.</td>
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<td>CB5</td>
<td>No acknowledgement of the principle of Agent of Change.</td>
<td>No</td>
<td>The Agent of Change principle is referred to in the draft London Plan (i.e. this is currently at consultative stage). Should it be adopted, it would apply to Planning which is a separate legislative regime from that of Licensing.</td>
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<td>Any potential references in future versions of the SLP would be dependent on the outcome of the London Plan consultation.</td>
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<td>Policy 5: Outside spaces</td>
<td>CB6</td>
<td>Notes that the statement ‘ensure minimal disruption to residents’ could adversely affect even the best run premises.</td>
<td>No</td>
<td>Ensuring minimal disruption to residents promotes the Licensing objective relating to Public Nuisance. Given outside spaces have less shielding for noise and other factors which may impact negatively on residents, providing guidance to Licensees and prospective Licensees that their licensable activities should ensure minimal disruption to residents is, in the view of the Council as the Licensing Authority, an appropriate approach to take in this SLP.</td>
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<td></td>
<td>Policy 7: Cumulative Impact</td>
<td>CB7</td>
<td>Welcomes the legislative requirement to review Cumulative Impact Policy (CIP) in Clapham and requests this is done promptly as the CIP has been in place for nine years.</td>
<td>No</td>
<td>The SLP notes the requirements relating to CIPs as required by the s182 Guidance issued by the Home Secretary. Any decision in relation to conducting a review will be undertaken with reference to the requirements outlined in the Licensing Act 2003 and accompanying Guidance.</td>
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<td>CB8</td>
<td>Notes that Clapham High Street largely has well-managed premises and the work of This is Clapham has helped to address some of the reasons that the CIP was implemented.</td>
<td>No</td>
<td>No action required re SLP. This assertion will be considered in any review of the current CIP in place in Clapham.</td>
</tr>
<tr>
<td></td>
<td>Policy 8 – Hours of sale and location</td>
<td>CB9</td>
<td>Noted that the location designations do not align well with London Plan designations and that they can impact on local businesses unfairly. Particularly in relation to variation between Major Town</td>
<td>No</td>
<td>There is little variation between Major Town Centres and District Centres in terms of closing times in the SLP, and it should be noted that each application is considered on its own merits as the closing times within the SLP are a stated</td>
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<tr>
<td>Cllr Fred Cowell Chair of Lambeth Licensing Committee/Lambeth Licensing Sub-Committee</td>
<td>General</td>
<td>FC1</td>
<td>Noted support for the clarifications on hours of operations and the relationship between immigration offences and licensed premises.</td>
<td>No</td>
<td>No action undertaken as the updated SLP seeks to address these issues and the response appears to support this stance.</td>
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<td>FC2</td>
<td>Supports the changes to opening hours for off-licences.</td>
<td>No</td>
<td>No action undertaken as the updated SLP seeks to address these issues and the response appears to support this stance.</td>
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</table>
| | | FC3 | Notes that there is a lack of ambition for matters such as the introduction of a code of minimum pricing for off licences. | No | A ban on selling alcohol below a “permitted price” has been in place since 28 May 2014. This was introduced through the Licensing Act 2003 (Mandatory Conditions) Order 2014. The permitted price is defined as the level of alcohol duty plus VAT. This means that a can of average strength lager cannot be sold for less than 41p and a standard bottle of vodka cannot be sold for less than £9.06 (as at August 2018).
In July 2018, the Government said that minimum unit pricing “remains under review” and that Public Health England would be commissioned to carry out a review into the impact of MUP in Scotland.
There has been some discussion of whether licensing authorities can set a minimum unit price. Home Office |
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<td>guidance on the Licensing Act states that licensing authorities should not impose fixed prices through blanket licence conditions ¹ however the new wording of the SLP includes a section with general reference to minimum unit pricing. Wording is amended in this section of the SLP however the introduction of a code of minimum pricing for off licences has not been introduced.</td>
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<td>FC4</td>
<td>Notes the need to support the late-night economy in major town centres.</td>
<td>No</td>
<td>The new SLP does not change the existing terminal hours for the late-night economy in major town centres, and the policies outline best practice that is not likely to pose additional barriers to well run, well-regulated businesses.</td>
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<tr>
<td>FC5</td>
<td>Notes the need to provide mechanisms to alert community members of applications to facilitate more community involvement in the licensing process.</td>
<td>No</td>
<td>Information and the facility to sign up for alerts are available through public access on the Lambeth Council website. Information on this is included in Policy 1: Process for applications in the SLP.</td>
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<tr>
<td>Policy 8 – Hours of sale and location</td>
<td>Notes the need for more clarity to be provided to applicants on indicative criteria where applicants are seeking hours longer than the preferred hours.</td>
<td>No</td>
<td>The preferred hours in the SLP set out the expectations of the Licensing Authority. Under the legislation each application is considered on a case by case basis and the emphasis within the SLP is that the onus is on the applicant. As each case may have different factors (e.g. location, nature and type of premises etc) it would be difficult to provide indicative criteria without creating an expectation that if an applicant meets the criteria they will have their application accepted.</td>
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¹ ‘Alcohol: Minimum Pricing’ – John Woodhouse (House of Commons Library BRIEFING PAPER Number 5021, 29 August 2018)
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|             |         | FC7 | Notes that there is a need to consider venues that are seeking applications that do not conform one type of venue – e.g. where there are more fluid or multiple aspects of the venue. | No | The ‘Venues’ section of the SLP seeks to address this via the following wording:  
'The Authority expects that applicants will articulate clearly the type of venue they will be operating. The Authority wants applicants for licences to be clear, open and frank about the nature of the venue they wish to operate. In the night time economy the terminal hour is often a significant factor in determining the nature of the venue. This provides clarity for responsible authorities and other persons who can then assess what the impact may be.' |
|             |         | FC8 | Notes that the differentiation between terminal hours for late night establishments (such as night clubs) should be more aligned with terminal hours with restaurants. | No | Within the SLP there is a distinction between food-led establishments and mainly alcohol-led establishments (e.g. night clubs). There are no guidelines listed within the SLP for start or closing times for nightclubs/ non-diversified alcohol-led venues for local centres/ shopping parades and residential areas as we would not welcome any application for this type of premises within these types of areas. Preferred closing times for both restaurants/ cafes and nightclubs/ non-diversified alcohol-led venues are listed as 01:00 for Fridays and Saturdays and midnight for the remainder of the week are listed for District centres (i.e. both are the same). For major town centres and strategic cultural areas, the difference between the preferred hours between the two types of premises is as follows:  
**Restaurants/ cafes:** Friday- Saturday close at 01:00; Sunday-Thursday close at 00:00 (no preferred opening times stated)  
**Nightclubs/ non-diversified alcohol-led venues:** |
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<td>Lambeth Council Licensing Team</td>
<td>Specific comments</td>
<td>LL1</td>
<td>2.5 – ‘working in alignment with the Planning regime as closely as is possible’. Licensing and Planning are unable to put a representation in against a licensing application currently where no planning permission is in place.</td>
<td>No</td>
<td>The wording of the SLP encourages working as closely as possible within the confines of the legislative framework.</td>
</tr>
<tr>
<td>LL2</td>
<td>2.8 – ‘commercial premises need to have provision in place for the collection of waste’. Is this something that Licensing will be questioning during the application process.</td>
<td>No</td>
<td>This section of the new SLP is noting that it is a requirement for premises to demonstrate in their application that they have provision in place for the collection of waste. This refers to the licensing objective relating to public nuisance by applicants being required to demonstrate from the outset that this is done in a way to promote this objective.</td>
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<tr>
<td>LL3</td>
<td>3.4 – ‘existing 1491’ this number is constantly changing from week to week, therefore would it be beneficial to do an approximate i.e. Lambeth currently have approx. 1500.</td>
<td>Yes</td>
<td>This was a generalised statement which provided a snapshot of the number of licensed premises at the time of writing to provide context. The wording has been updated to ‘approximately 1500’.</td>
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<td>LL4</td>
<td>3.6 – ‘there may be a charge for this service’. Is this indicating that Licensing may charge a fee or that other Responsible Authorities might?</td>
<td>No</td>
<td>This wording makes provision for the potential for future charging (e.g. for pre-application advice).</td>
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<td>LL5</td>
<td>3.15 – ‘Membership of the Business Crime Reduction Partnership’ – Clarification if Licensing is permitted to ask for membership to be a condition of the licence as there is a fee.</td>
<td>No</td>
<td>If it is an appropriate condition that is agreed to it would be applicable. Other licensing conditions may also incur cost, e.g. provision of door staff, CCTV etc.</td>
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<td>LL6</td>
<td>3.21 – ‘all new applications and variations should be accompanied by a Fire Safety Risk Assessment’. Is this a document Licensing Officers should be requesting at point of application or should this be sent separately only to the London Fire Brigade by the applicant.</td>
<td>No</td>
<td>All applicants are expected to submit a completed Fire Safety Risk Assessment with their application, as evidence that a Fire Safety Risk Assessment has been carried out and Licensing should check that this has been done. The LFB are a Responsible Authority so would receive all application documentation.</td>
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<td>LL7</td>
<td>5.5 – List of responsible authorities should include Port of London Authority (for vessels only). Contact details are as follows: London River House, Royal Pier Road, Gravesend, Kent, DA12 2BG Tel: 01474562200.</td>
<td>Yes</td>
<td>Now included in updated draft.</td>
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<td></td>
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<td>LL8</td>
<td>6.5 – “where late payment or non-payment [of annual fees] is due to ‘administrative error’ the licence will not be suspended”. This gives the impression that if it is the licence holder’s admin error then the licence will not be suspended, could we clarify to say this is in relation to a Licensing Authority’s admin error.</td>
<td>Yes</td>
<td>Wording has been updated as follows: ‘If the fee is disputed prior to the date it is due for payment the licence will not be suspended pending clarification and resolution. Once the actual fee has been clarified this will be payable and continued non-payment will result in suspension. Where an administrative error in relation to the recorded receipt of the annual fee has been made by the local authority and the Licence holder has provided proof of payment the licence will not be suspended.</td>
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<td>LL9</td>
<td>10 – ‘with 10 days being the statutory minimum’ should read: ‘with 10 days</td>
<td>Yes</td>
<td>Now included in updated draft.</td>
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<td>being the statutory minimum for a standard TEN.’</td>
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<td>LL10</td>
<td>Section</td>
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<td>Within Policy 6 could we provide further information on the two different TENs process and the difference between them? For example it may be worth mentioning a Late TEN doesn’t allow for mediation or a hearing, therefore if an objection is received a counter notice is issued (mentioned in 10.3).</td>
<td>Yes</td>
<td>This Policy in the document has now been rewritten to provide full clarity. Guidance on timelines for the TENs process is included and advises early submission.</td>
</tr>
<tr>
<td>LL11</td>
<td>Section 10.6 – This paragraph directly relates to risk assessments to be provided with a TEN as additional information. Could we also mention that Community Safety (Environmental function) and Police Licensing may request other documents to support their TEN such as a Noise Management Plan?</td>
<td>Yes</td>
<td>Wording now includes this.</td>
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<td>LL12</td>
<td>Section 14.2 – If a premises is located near a Town Centre but also within close proximity to residential properties, could this become an issue? Would it be good to have a sentence to confirm that each case is classified on its merits by the licensing officers?</td>
<td>Yes</td>
<td>Wording in the draft Policy now as follows: ‘To take into account these and other developing areas the Authority will apply the principle of each application being considered on its own merits – both in terms of the venue and its operations, and in terms of the context in which it operates and its proximity to residential buildings.’</td>
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<tr>
<td>LL13</td>
<td>Section 17.3 &amp; 17.4 – Would these paragraphs flow better if they were the other way</td>
<td>Yes</td>
<td>Amended.</td>
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<td>round? So you are introducing who the DPS is first and then clarify that they must authorise the SOA.</td>
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<td>LL14</td>
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<td>17.6 – This paragraph mentions a ‘basic skills course’. What basic skills is this for? Who is expected to complete the course i.e. staff who clean dishes? Are staff expected to carry out a refresher course?</td>
<td>Yes</td>
<td>Wording has been amended to provide clarification.</td>
</tr>
<tr>
<td>Appendix 5: Types of premises and recommended hours by type of location</td>
<td>LL15</td>
<td></td>
<td>Off-licences –should this be licensable activities from 11am? As up until this time the nature of their business they will most likely be operating as a newsagents.</td>
<td>Yes</td>
<td>Appendix 5 has been rewritten for clarity.</td>
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<td>Take-aways – states a licence is only required between 23:00 – 05:00, this is correct if the premises is only applying for LNR, however they may also apply for SOA which then makes this incorrect. Would it be useful to mention the timings for these premises to avoid them falling outside of a category?</td>
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<td>LL16</td>
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<td>Brixton Town Centre &amp; Streatham Town Centre Maps – improved resolution required.</td>
<td>Yes</td>
<td>Improved quality maps of these areas will be included in the final version of the new SLP prior to publication in January 2019.</td>
</tr>
<tr>
<td>Lambeth Police</td>
<td>Specific comment</td>
<td>LP1</td>
<td>‘Measures to prevent crime and disorder’: request to include the following wording: ‘The Authority would expect premises to cooperate with reasonable requests from Police following incidents, such as</td>
<td>Yes</td>
<td>This wording is now included.</td>
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<td>requests for CCTV footage or statements from staff members, and have provisions in place to provide those without undue delay.'</td>
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<td>Appendix 1: suggested inclusion: 'Are staff aware of how to respond to and record incidents of crime on their premises? Are incidents logged and reviewed to identify recurring issues?' Appendix 2 suggested addition: ‘Are staff trained to recognise and assist vulnerable patrons, such as those who are leaving alone or under the influence of alcohol or drugs?’</td>
<td>Yes</td>
<td>This wording is now included. New wording incorporated as follows: ‘Are staff trained to recognise and assist vulnerable patrons, such as those who are leaving alone and/or appear to be under the influence of alcohol or drugs?’</td>
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<td>10.6: MPS have withdrawn 'Form 696' which was previously used to risk assess events. New suggested text as follows: ‘Where an event that is promoted by the licence holder or an outside promoter is to take place, Premises operators are advised to undertake a risk assessment. Where this identifies a potential crime and disorder and/or a public safety risk linked to those providing the entertainment or to those attending the event, advice may be sought from Lambeth Police’s Licensing team via email at <a href="mailto:Licensing-LX@met.police.uk">Licensing-LX@met.police.uk</a>’.</td>
<td>Yes</td>
<td>This wording has been incorporated.</td>
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<td>London Night Time Czar Amy Lamé</td>
<td>Agent of change principle</td>
<td>LNC1</td>
<td>Recommendation for the inclusion of the Agent of Change principle.</td>
<td>No</td>
<td>The Agent of Change principle is referred to in the draft London Plan (i.e. this is currently at consultative stage). Should it be adopted, it would apply to Planning which is a separate legislative regime from that of Licensing. Any potential references in future versions of the SLP would be dependant on the outcome of the London Plan consultation.</td>
</tr>
<tr>
<td>Policy 5: Outside spaces</td>
<td></td>
<td>LNC2</td>
<td>Encourages greater partnership working between planning and licensing to ensure outside spaces are fit for purpose in terms of licensable activities.</td>
<td>No</td>
<td>The policy aims to encourage applicants to ensure that outside spaces are fit for the purposes being proposed for them in terms of any licensable activities.</td>
</tr>
<tr>
<td>Policy 6: Temporary Events</td>
<td></td>
<td>LNC3</td>
<td>Form 696 is no longer in use and this paragraph should be deleted.</td>
<td>Yes</td>
<td>This has been amended and replacement wording incorporated into the updated SLP.</td>
</tr>
<tr>
<td>Policy 7: Cumulative Impact</td>
<td></td>
<td>LNC4</td>
<td>Concerns that the statement relating to cumulative impact could be considered a borough-wide CIP.</td>
<td>No</td>
<td>This is a principle that is included in other London boroughs’ SLPs and is allowed for under the Licensing Act 2003.</td>
</tr>
<tr>
<td>Policy 13: Resource impact</td>
<td></td>
<td>LNC5</td>
<td>Clarification that membership of a BID will be a consideration.</td>
<td>No</td>
<td>This is implied, but it is not possible to indicate any further consideration as under the Licensing Act 2003 each application must be considered on its own merits.</td>
</tr>
<tr>
<td>Multi Agency Reducing Harm from Alcohol Group</td>
<td>Purpose of Statement of Licensing Policy</td>
<td>MA1</td>
<td>Notes the need to address the following: Price: e.g. use of a voluntary minimum unit price</td>
<td>Yes</td>
<td>A ban on selling alcohol below a “permitted price” has been in place since 28 May 2014. This was introduced through the Licensing Act 2003 (Mandatory Conditions) Order 2014. The permitted price is defined as the level of alcohol duty plus VAT. This means that a can of average strength lager cannot be sold for less than 41p and a standard bottle of vodka cannot be sold for less than £9.06 (as at August 2018).</td>
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<td>Guidance issued under S182 of the Licensing Act 2003 (April 2018) states that: ‘Licensing authorities should not attach standardised blanket conditions promoting fixed prices for alcoholic drinks to premises licences or club licences or club premises certificates in an area.’</td>
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<td>In July 2018, the Government said that minimum unit pricing “remains under review” and that Public Health England would be commissioned to carry out a review into the impact of MUP in Scotland. The new wording of the SLP includes a section with general reference to minimum unit pricing.</td>
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<td></td>
<td>The new wording of the SLP includes a section with general reference to minimum unit pricing.</td>
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<tr>
<td>MA2</td>
<td></td>
<td></td>
<td>Promotions: the clear expectation that licenced businesses have considered how ‘drinks promotions’ e.g. 2-for-1/ bottomless brunches are managed e.g. limited availability, availability of free drinking water and how customers are encouraged to drink responsibly and ensure that staff are not serving inebriated customers.</td>
<td>Yes</td>
<td>Wording in the SLP now includes the following: ‘Premises are expected not to offer or publicise irresponsible promotions which encourage irresponsible drinking. Where any relevant representations which demonstrate a clear causal link between sales promotions or price discounting and levels of crime and disorder on or near the premises, it will be appropriate for the Licensing Authority to consider the imposition of a new condition prohibiting irresponsible sales promotions or the discounting of prices of alcoholic beverages at those premises. Each case will be considered on its own merits.’ Regarding serving inebriated customers the wording is as follows: ‘The Authority expects existing authorisation holders and new applicants to be able to demonstrate the measures they use, or propose to adopt, to prevent and actively discourage the sale/supply of alcohol to children and to</td>
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<td>individuals who are already intoxicated and thus potentially pose a risk to themselves or others.'</td>
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<td>'The sale of alcohol to persons who are intoxicated is also an offence under the Licensing Act 2003.'</td>
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<td>'Any delivery driver or third-party courier will be required to have appropriate age verification training, and in particular they will be required to have undergone training in refusal of supply where age verification is not provided, or the recipient is clearly intoxicated.'</td>
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<td>Availability of free drinking water: 'It is likely that this Good Operator Guide would include the following which applicants may want to take into account: • The provision of drinking water for patrons of licensed premises’</td>
<td></td>
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<tr>
<td>MA3</td>
<td>Early morning alcohol restriction orders.</td>
<td>No</td>
<td>Although there is provision within the legislation and Guidance, the preferred hours within the SLP addresses the role an EMRO would take.</td>
<td></td>
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<tr>
<td>MA4</td>
<td>Include: 'Alcohol related harm: The misuse of alcohol (and drugs) presents a wide range of social and health issues. It can have serious consequences for individuals, their family members and whole communities including anti-social behaviour and crime, domestic abuse, violence, child neglect and abuse, family breakdown, unemployment, homelessness as well as physical and mental health problems.'</td>
<td>No</td>
<td>Wording in the draft SLP includes the following within the ‘Public Health’ section: ‘[…] the Authority is aware that there is a significant negative impact on the health of our residents caused by alcohol, reflected in hospital admissions and deaths from alcohol related illnesses, and alcohol induced violence. […] Many Lambeth residents suffer negative health and wellbeing effects from alcohol misuse and use and it is important to take into account these impacts as part of the wider balance for both residents and businesses in Lambeth.’</td>
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|              |         |     | * Health and cost to health and other public services  
|              |         |     | * Violence (including domestic and sexual)  
|              |         |     | * Anti-social behaviour  
|              |         |     | * Noise nuisance  
|              |         |     | * Environmental impact  
|              |         |     | * Adverse Childhood Experiences as a result of parental alcohol misuse’ | In addition, clarification is provided in the ‘Measures to prevent crime and disorder’ section.  
<p>| | | |
|              |         |     |<br />
| MA5          | Notes the need to identify where SEV licensing is covered. | Yes | This has been removed from the draft SLP. |
| MA6          | There is a lack of policies specific to performance of plays and exhibitions of films. | No | The policies are specific to an issue or general to all licenses. |
| MA7          | Notes that where planning hours and licensing hours do not align the earlier hours should apply – and note that if there is not a legal reason for this each application should be judged on its own merits. | No | Planning and Licensing are separate legislative regimes and each case is assessed on an individual basis in line with the approach required in the legislation. |
| MA8          | Suggest expanding the alcohol-related harm section. | No | The context for the document on this has been kept relatively brief intentionally as it does not necessarily add to the aims of the document as promoting the licensing objectives through well managed, well-regulated business. |</p>
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<tr>
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<td>Aspirations and intent</td>
<td>MA9</td>
<td>Note that Cumulative Impact should be included here as the basis of licensing approach, as demonstrated by the Liverpool City Council SLP.</td>
<td>No</td>
<td>This approach does not align with a number of key aims and requirements, including: encouraging well-managed, well-regulated business, encouraging the aspirations in Future Lambeth, and considering each application on its own merits in line with the legislation.</td>
<td></td>
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</table>
| Measures to promote the Licensing Objectives | MA10 | **Measures to prevent crime and disorder**  
Support noting of VAWG. | No | No action required re SLP. |
| | MA11 | Para 3.11, include resulting Ambulance call outs and A&E attendances. | Yes | Wording now included. |
| | MA12 | Para 3.15, consideration for the establishment of Community Alcohol Partnerships | No | This could be a matter for operational implementation but is outside the scope of the SLP. |
| | MA13 | **Measures to ensure public safety**  
Recommend a more pro-active approach and the promotion of the ‘Safer Clubbing Guide’ | Yes | A proactive approach would come through the enforcement of licensing policy and practice. The ‘Safer Clubbing Guide’ is a useful document, but would need to be updated as it is 15 years old. A more recent version is the Safer Nightlife document published in 2008. Reference to this has been included in the ‘Measures to ensure public safety’ section. |
| | MA14 | **Measures to prevent public nuisance**  
‘Detailed dispersal policy’: We would like to see this as mandatory, and if this is not possible legally, that applicants are “strongly encouraged” or wording that supports a more proactive approach being taken. | Yes | Wording amended in this section as follows:  
‘Applicants for licences to run after midnight and for variations to extend existing hours are expected to prepare a detailed dispersal policy and submit this with their application.’  
Additional focus is provided through a specific Policy on dispersal. |
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<td>MA15</td>
<td></td>
<td>MA15</td>
<td>Reference to taxi marshals/access to a taxi service should be included in here as well.</td>
<td>Yes</td>
<td>Now included.</td>
</tr>
<tr>
<td>MA16</td>
<td></td>
<td>MA16</td>
<td>Measures to protect children from harm Safeguarding policy Lambeth’s licensing policy should be more explicit in ensuring that the London Safeguarding Children’s Board advice and guidance for licensed premises operators and their staff are adhered to.</td>
<td>Yes</td>
<td>This has been added.</td>
</tr>
<tr>
<td>MA17</td>
<td></td>
<td>MA17</td>
<td>Child Sexual Exploitation (CSE) Licensed operators should adhere to best practice such as ‘Operation-Makesafe’, a partnership that the Metropolitan Police run with London boroughs to raise CSE awareness.</td>
<td>Yes</td>
<td>This has been added.</td>
</tr>
<tr>
<td>MA18</td>
<td></td>
<td>MA18</td>
<td>We would wish to see the Licensing Service to pro-actively work with Children and Young People’s service to develop a voluntary code of practice with accreditation through a a quality mark for children and young people friendly businesses using the “Lambeth Made” branding and campaign to promote good practice. This quality standard would be displayed by local businesses and would include criteria on safeguarding (including Child Sexual Exploitation)</td>
<td>No</td>
<td>This could be a matter for operational implementation but is outside the scope of the SLP.</td>
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<td>training/awareness for managers and staff.</td>
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<td>MA19</td>
<td>17.2 should include explicit reference to safeguarding training</td>
<td>Yes</td>
<td>This has been amended.</td>
</tr>
<tr>
<td></td>
<td>Policy 5: Outside spaces</td>
<td>MA20</td>
<td>Could reference to the Disability Discrimination Act be included and the expectation of licensees be more explicit here?</td>
<td>Yes</td>
<td>Wording now states: 'Licensees must take into account the needs of patrons with disabilities and comply with the requirements of the Equalities Act 2010.'</td>
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<td></td>
<td></td>
<td>MA21</td>
<td>Para. 9.4 could also make reference to residents with mobility difficulties.</td>
<td>Yes</td>
<td>Wording now included.</td>
</tr>
<tr>
<td></td>
<td>Policy 14: Health</td>
<td>MA22</td>
<td>20.1: harm to children due to parent/carer misuse of alcohol. The policy should signal explicitly that screening of applications for any adverse potential impact on health will be done and objections raised.</td>
<td>No</td>
<td>Wording of the SLP includes: 'Since 2012 the Lambeth Director of Public Health has been a responsible authority and is able to make representations on applications and initiate reviews. The Lambeth Director of Public Health has access to data and evidence that is useful and informative for the, development of policy, the consideration of applications and the conduct of reviews. This includes: evidence on the impact of alcohol on the physical and mental health of residents, particularly children;'</td>
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<tr>
<td></td>
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<td>MA23</td>
<td>20.6: We strongly support the development of a “Good Operator Guide” by the Association of London Directors of Public Health and agree that once developed applicants are encouraged to read this and include appropriate good practice in any subsequent licencing application.</td>
<td>Yes</td>
<td>Wording now included.</td>
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<td>MA24</td>
<td>There should be active consideration of the clustering of late-night refreshment outlets as this can lead to harm. For late night refreshments, in addition to clustering, consideration of a condition to provide healthy eating choices should be included.</td>
<td>No</td>
<td>Each application needs to considered on its own merits. However, general application of Cumulative Impact can be grounds for a representation by a Responsible Authority.</td>
</tr>
<tr>
<td></td>
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<td>MA25</td>
<td>We would wish to see the Policy make clear that restricted trading by fast food outlets is advised outside schools (e.g. ice cream, burger vans) as part of the Council’s approach to promoting healthy weight and our commitment to the Local Authority declaration on healthier food and sugar reduction.</td>
<td>No</td>
<td>The regulation of food provision as a licensable activity under the Licensing Act 2003 relates only to hot food and/or hot drink between 11pm and 5am and so this aspiration falls outside of the SLP.</td>
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<td></td>
<td></td>
<td>MA26</td>
<td>Smoking causes significant harm to health and this includes second-hand smoke. Consideration should be made of the siting of any smoking areas to protect patrons or residents living adjacent to the premises such as in al fresco dining.</td>
<td>No</td>
<td>This has been outlined in Policy 5: Outdoor Spaces.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>MA27</td>
<td>We would strongly urge that the Policy attempts to try and tackle the availability of excessively cheap alcohol in the borough and encourage voluntary minimum unit pricing. We are aware that Newcastle City Council has included this in its new Licensing Policy. We understand that their Policy promotes a</td>
<td>See MA1</td>
<td>Already raised by Multi Agency Reducing Harm from Alcohol Group – see response at MA1.</td>
</tr>
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<td>minimum price per unit of 50p for all licensed premises.</td>
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<td>Policy 15:</td>
<td>MA28</td>
<td></td>
<td>We would wish to see the Police make clear that this type of drinking environment is discouraged.</td>
<td>No</td>
<td>Other factors have been addressed in the Policies. However, it may be difficult to group venues in this way currently, and may be a blunt tool to use.</td>
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<td>Delivery</td>
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<td>Services</td>
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<td>Policy 17:</td>
<td>MA29</td>
<td></td>
<td>Note a desire to see the policy include a requirement that alcohol is not handed over if the recipient is visibly intoxicated.</td>
<td>Yes</td>
<td>This has been added.</td>
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<td>Sexual</td>
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<td>Entertainment Venues</td>
<td>MA30</td>
<td></td>
<td>Recommends putting in more guidance around good practice management of SEVs.</td>
<td>No</td>
<td>This section has now been removed from the draft as this is dealt with under separate legislation/ a separate policy.</td>
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<td>Venues</td>
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<td>MA31</td>
<td></td>
<td></td>
<td>Notes that a wider range of issues may be of concern to the wider public.</td>
<td>No</td>
<td>The range of issues noted in the SLP relate directly to the matters that are pertinent to the SLP.</td>
</tr>
<tr>
<td>MA32</td>
<td></td>
<td></td>
<td>The policy needs to be more detailed given the Council’s commitments to addressing violence against women and girls (VAWG).</td>
<td>See VA1-VA7</td>
<td>There is a specific policy on VAWG within the updated SLP, however it should be noted that there is a standalone Safer Lambeth VAWG Strategy, which sets out the full vision, priorities and actions re VAWG for the borough. See section of this table relating to the VAWG submission.</td>
</tr>
<tr>
<td>Appendices</td>
<td>MA33</td>
<td></td>
<td>Recommend standard forms of wording for the questions guiding the development of the operating schedule.</td>
<td>No</td>
<td>This is a checklist for use by applicants to determine what needs to be put in their operating schedule, therefore the form of the wording in the appendices currently is the most appropriate.</td>
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<td>MA34</td>
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<td></td>
<td>Recommend ‘premises labelling’, this is where the off-licence adds a label which includes the premises name and possibly address.</td>
<td>No</td>
<td>This would not be possible as a blanket measure and is an operational suggestion and therefore is outside the remit of the SLP</td>
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<td>MA35</td>
<td>Include WAVE and Ask Angela training in Appendix 2</td>
<td>No</td>
<td>Already included in the document: there is reference to ‘Ask Angela’ and more general training.</td>
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<td>MA36</td>
<td>Recommend restrictions on access to children, or sales of alcohol during after school hours.</td>
<td>No</td>
<td>The sale of alcohol to children is against the law at any time. Any self-restriction by businesses on sales of alcohol to adults during after school hours would be carried out on a voluntary basis unless this was deemed a necessary condition on the licence as determined on a case by case basis.</td>
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<td>MA37</td>
<td>Include reference to other health lifestyles initiatives, such as the Healthy Catering Commitment.</td>
<td>No</td>
<td>This is beyond the scope of the SLP.</td>
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<td>MA38</td>
<td>Concerned that the opening and closing times do not have robust policy rationale.</td>
<td>No</td>
<td>The hours have been set based upon operational guidance and key stakeholder engagement.</td>
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<td>MA39</td>
<td>Restaurants and cafes should also have an 11am opening time.</td>
<td>No</td>
<td>The Licensing Act only requires the licensing of hot food/hot drink between the hours of 11pm and 5am. Where a licence is sought by a restaurant or café for the sale and supply of alcohol this will be assessed on a case by case basis (in line with the Act).</td>
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<td></td>
<td></td>
<td>MA40</td>
<td>11 pm is too late for festivals and outdoor events.</td>
<td>No</td>
<td>11pm is a reasonable time for these events to have licence until.</td>
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<tr>
<td></td>
<td></td>
<td>MA41</td>
<td>Potential impacts of Night clubs should include sexual violence and potential drug misuse.</td>
<td>Yes</td>
<td>This has been added.</td>
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<td></td>
<td></td>
<td>MA42</td>
<td>Public Houses and Bars – there should be reference to safeguarding children and young people.</td>
<td>Yes</td>
<td>Included.</td>
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<td>MA43</td>
<td></td>
<td>Off-licences – reference to proximity to night clubs (in terms of pre-loading) and also proxy-sales should be included.</td>
<td>No</td>
<td>This is too specific to add into the SLP but can be addressed in conditions where appropriate and where any representations are made by Public Health.</td>
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</tr>
<tr>
<td>MA44</td>
<td></td>
<td>With reference to take-aways, there is evidence that these can attract anti-social behaviour or even violence. Suggest that this is reviewed with the Police.</td>
<td>Yes</td>
<td>Anti-social behaviour has been added to Appendix 6, violence already noted.</td>
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</tr>
<tr>
<td>MA45</td>
<td></td>
<td>Festivals and Outdoor events – reference to child protection / safety issues</td>
<td>Yes</td>
<td>This has been added.</td>
<td></td>
</tr>
<tr>
<td>MA46</td>
<td></td>
<td>CIPs – reference to timing and process of review of CIPs.</td>
<td>No</td>
<td>Process is set out in Guidance issued under Section 182 of the Licensing Act 2003.</td>
<td></td>
</tr>
<tr>
<td><strong>Norwood Forum</strong></td>
<td><strong>General</strong></td>
<td>NW1</td>
<td>Disappointed that consultation wasn’t conducted more widely through open meetings prior to the publication of the draft SLP which went out to public consultation.</td>
<td>No</td>
<td>The approach was to update the existing SLP with reference to legislative updates; benchmarking; best practice; interviews with the responsible authorities and professional bodies and to then put this resulting draft out to public consultation. This allowed for testing as to whether the draft document is clear and easy to use, and to determine whether there are any anomalies or omissions. The online survey allowed for closed comments and also for respondents to provide additional information where they wished to do so.</td>
</tr>
<tr>
<td>NW2</td>
<td></td>
<td>Notes some errors in paragraph numbering.</td>
<td>Yes</td>
<td>Noted. Numbering is being checked throughout the process however the document is being added to and amended on a rolling basis – during the drafting some errors in numbering may occur until the final draft is produced. The document which is published in January 2019 will be the</td>
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<td>definitive version and all numbering and formatting will be verified prior to final publication.</td>
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<td></td>
<td>NW3</td>
<td></td>
<td>No explicit link with how the SLP fits with the events policy.</td>
<td>No</td>
<td>The SLP notes the expectation of applicants holding events to align with the Council’s Events policy.</td>
</tr>
<tr>
<td></td>
<td>NW4</td>
<td></td>
<td>Support the statement that where the Mayor’s Vision and local priorities don’t align local priorities will be given priority.</td>
<td>No</td>
<td>No action required as the response appears to support this area of the SLP.</td>
</tr>
<tr>
<td></td>
<td>NW5</td>
<td></td>
<td>Would like to see ‘light touch’ procedure applied for community activities.</td>
<td>No</td>
<td>The legislation dictates that all applications must be considered on their own merits.</td>
</tr>
<tr>
<td></td>
<td>NW6</td>
<td></td>
<td>The ‘Creative Enterprise Zone’ mooted in the Lambeth Plan has not been specifically addressed in terms of locations.</td>
<td>No</td>
<td>These are currently proposed and not yet in place. The SLP locations are based on the extant planning designations.</td>
</tr>
<tr>
<td></td>
<td>NW7</td>
<td></td>
<td>Noted that ‘Good Operator Guide’ is mooted and should be developed soon.</td>
<td>Yes</td>
<td>See ‘MA2’ above.</td>
</tr>
<tr>
<td></td>
<td>NW8</td>
<td></td>
<td>It is noted that an aim is to ‘encouraging greater community involvement in licensing decisions’, but that no description of how this will be done is in the SLP.</td>
<td>Yes</td>
<td>We have included wording on public access in the document as follows: ‘[…] our Public Access service can be used to be advised of licence applications received for specified areas or submitted for a particular premises. The service can also be used to search existing licences to view activities, times and conditions. This service is available at the following link: <a href="http://planning.lambeth.gov.uk/online-applications/search.do?action=simple&amp;searchType=licencingApplication%E2%80%99">http://planning.lambeth.gov.uk/online-applications/search.do?action=simple&amp;searchType=licencingApplication’</a> We will be exploring this area as an operational issue outside of the production of the SLP.</td>
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<td><strong>Scope of the Policy</strong></td>
<td>NW9</td>
<td>It is noted that live music is not in the list of licensable activities.</td>
<td>No</td>
<td>Live music is no longer covered by the SLP and is therefore not included in the document.</td>
<td></td>
</tr>
<tr>
<td></td>
<td>NW10</td>
<td>Recommends that planning hours should apply for licensing hours unless good reason otherwise, and that planning permission should be evidenced in licence applications.</td>
<td>No</td>
<td>This is not possible as a) as each application must be considered on its own merits under the Licensing Act 2003 and b) planning permission can be sought subsequent to a licence being obtained.</td>
<td></td>
</tr>
<tr>
<td><strong>The Lambeth Context</strong></td>
<td>NW11</td>
<td>Greater onus to be placed on enforcing the law re serving those who are intoxicated.</td>
<td>No</td>
<td>Wording in the SLP includes the following: 'The Authority expects existing authorisation holders and new applicants to be able to demonstrate the measures they use, or propose to adopt, to prevent and actively discourage the sale/supply of alcohol to children and to individuals who are already intoxicated and thus potentially pose a risk to themselves or others.' 'The sale of alcohol to persons who are intoxicated is also an offence under the Licensing Act 2003.' 'Any delivery driver or third-party courier will be required to have appropriate age verification training, and in particular they will be required to have undergone training in refusal of supply where age verification is not provided, or the recipient is clearly intoxicated.' Enforcement is an operational matter and outside the remit of the SLP.</td>
<td></td>
</tr>
<tr>
<td></td>
<td>NW12</td>
<td>Lambeth should also inform residents of applications.</td>
<td>No</td>
<td>This is an operational matter. Information on applications is available from the Council website at <a href="http://www.lambeth.gov.uk">www.lambeth.gov.uk</a> In addition, our Public Access service can be used to be advised of licence applications received for specified areas or submitted for a particular premises. The service can also</td>
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<td>be used to search existing licences to view activities, times and conditions.</td>
<td>No</td>
<td>This is an operational matter and is outside the remit of the SLP.</td>
</tr>
<tr>
<td></td>
<td>Policy 1 – Process for Applications</td>
<td>NW13</td>
<td>There should be explicit plans to formalise partnerships.</td>
<td>No</td>
<td>A Licensing inspection is carried out by a suitably qualified Licensing practitioner on behalf of the Licensing Authority. Inspections can be carried out as part of a routine inspection programme, or as part of reactive work. Visits may be carried out on ad hoc basis and are in general advisory, for example where these are generated from requests made by potential applicants at the pre-application stage. Visits may also be carried out by other officers e.g. in relation to Trading Standards issues; Noise etc.</td>
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<tr>
<td></td>
<td>Policy 4 – enforcement approach</td>
<td>NW14</td>
<td>Contradiction between inspections and visits.</td>
<td>No</td>
<td>Tables and chairs are licensed under a separate Act (the London Local Authorities Act 1990) and so this is not covered in the SLP.</td>
</tr>
<tr>
<td>NW15</td>
<td>This should include a copy of tables and chairs policy</td>
<td>No</td>
<td>The Licensing Act sets out who is able to comment on TENs and we are required to adhere to the legislation.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>NW16</td>
<td>Other responsible authorities and residents should be able to comment on TENs</td>
<td>No</td>
<td>It is not possible to be more definitive and certainty cannot be provided as each individual application has to be considered on its own merits under the legislation. The use of different wording could be viewed as prejudicial to the outcome.</td>
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<tr>
<td>NW17</td>
<td>Uncertainty created by the use of the word ‘may’</td>
<td>No</td>
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<td></td>
<td><strong>Policy 8 – Hours of sale and location</strong></td>
<td>NW18</td>
<td>Should refer to ‘any future planning documents’ also.</td>
<td>Yes</td>
<td>Updated wording now states: ‘To take into account these and other developing areas the Authority will apply the principle of each application being considered on its own merits – both in terms of the venue and its operations, and in terms of the context in which it operates and its proximity to residential buildings - along with reference to any future planning documents.’</td>
</tr>
<tr>
<td></td>
<td><strong>Miscellaneous</strong></td>
<td>NW19</td>
<td>Query of what the different approach of the BIDs is.</td>
<td>No</td>
<td>The different approach is in terms of the change for ensuring funding provided to ameliorate the impacts of the businesses. We believe that this will be enforceable as any aspects of the licensing process are.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>NW20</td>
<td>Question the enforceability of delivery services policy.</td>
<td>No</td>
<td>Operational matter. We believe that this will be as enforceable as any aspects of the licensing process are.</td>
</tr>
<tr>
<td></td>
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<td>NW21</td>
<td>Some delegated powers are questioned as against natural justice – e.g. Revocation of Club Licenses and determination of ‘frivolous…’ representations.</td>
<td>No</td>
<td>General comment. The Licensing Authority has a duty to assess each case on its own merits and will take a view, based on the evidence provided, as to whether a case is legitimate. This is the case for every Licensing Authority.</td>
</tr>
<tr>
<td></td>
<td><strong>Appendices</strong></td>
<td>NW22</td>
<td>Queries around existing designations.</td>
<td>Yes</td>
<td>‘Opening times’ and ‘closing times’ – wording has been changed to ‘start times’ and ‘end times’ to provide clarity. Designations remain the same as those in the current SLP apart from the addition of preferred start times and the inclusion of ‘Festivals and outdoor events’. Further narrative has been added around Takeaways to provide clarification.</td>
</tr>
<tr>
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<td>NW23</td>
<td>General SN1</td>
<td>Noted support for the following policies: Policy 13: Resource Impact Policy 5: Outside spaces Policy 15: Delivery Services Policy 16: Dispersal and Entry Policy 8: Hours of sale and location – specifically the preferred 11 am opening hour.</td>
<td>No</td>
<td>No action required as the response appears to support this area of the SLP.</td>
<td></td>
</tr>
<tr>
<td>Safer Neighbourhoods Panel Chairs</td>
<td>Policy 7: Cumulative Impact SN2</td>
<td>Notes disappointment that SLP does not propose new CIP areas.</td>
<td>No</td>
<td>CIPs can be included in an SLP but are not restricted to inclusion in an SLP. Currently there has been no policy decision to create a new CIP area and therefore this matter is not included in the SLP beyond the inclusion of the existing CIP area in Clapham High Street.</td>
<td></td>
</tr>
<tr>
<td>Scope of the Policy SN3</td>
<td>Notes the inclusion of the interrelation between the SLP and the Mayor’s Vision and notes the impact of 24-hour NTE on local residents and communities.</td>
<td>No</td>
<td>Additional to the sections on the Mayor’s Vision many of the policies in the SLP are aimed at addressing any negative impacts on residents and communities of licensed activity.</td>
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<td>Policy 6: Temporary Events</td>
<td>SN4</td>
<td>Notes that it may be useful to advise applicants to show that they have consulted local residents’ groups to understand and minimise any impacts from temporary events on the local residents and communities.</td>
<td>Yes</td>
<td>This has been added.</td>
</tr>
<tr>
<td></td>
<td>Policy 8 – Hours of sale and location</td>
<td>SN5</td>
<td>Notes that terminal hours should not become any later than those proposed.</td>
<td>No</td>
<td>For the purposes of the proposed SLP the terminal hours are a stated preference, however, each application must be considered on its own merits under the legislation.</td>
</tr>
<tr>
<td>Sleepless in Brixton</td>
<td>Key points</td>
<td>SB1</td>
<td>Propose introduction of CIP in Brixton Town Centre.</td>
<td>No</td>
<td>Currently there has been no policy decision to create a new CIP area and therefore this matter is not included in the SLP beyond the existing CIP area in Clapham High Street.</td>
</tr>
<tr>
<td></td>
<td>SB2</td>
<td>Propose that Appendix 7 includes a definition of Brixton Town Centre as a mixed residential area.</td>
<td>No</td>
<td>The definitions in Appendix 7 of the draft SLP are drawn from existing planning definitions and correspond accordingly.</td>
<td></td>
</tr>
<tr>
<td></td>
<td>SB3</td>
<td>Note that the SLP needs greater realism about the capacity to enforce it.</td>
<td>No</td>
<td>This is an operational matter and not a matter for the SLP.</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Policy 1: Process for Application</td>
<td>SB4</td>
<td>Applicants should be advised to engage with local residents.</td>
<td>Yes</td>
<td>This is referred to throughout the SLP.</td>
</tr>
<tr>
<td></td>
<td>SB5</td>
<td>The Council should make available automated notification of applications.</td>
<td>No</td>
<td>Our Public Access service can be used to be advised of licence applications received for specified areas or submitted for a particular premises. The service can also be used to search existing licences to view activities, times and conditions. This service is available at the following link: <a href="http://planning.lambeth.gov.uk/online-applications/search.do?action=simple&amp;searchType=LicensingApplication">http://planning.lambeth.gov.uk/online-applications/search.do?action=simple&amp;searchType=LicensingApplication</a></td>
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<td></td>
<td>This wording has been included in the SLP.</td>
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<tr>
<td>Policy 3: Partnership working</td>
<td>SB6</td>
<td>Propose expanded partnership working to include TfL, BTP, the Brixton Society and other residential groups.</td>
<td>No</td>
<td>Policy 3 includes a commitment to partnership working, how this is enacted is an operational matter.</td>
<td></td>
</tr>
<tr>
<td>Policy 4: Enforcement approach</td>
<td>SB7</td>
<td>Note that Lambeth is under resourced for enforcement.</td>
<td>No</td>
<td>This is an operational matter.</td>
<td></td>
</tr>
<tr>
<td>Policy 5: Outdoor Spaces</td>
<td>SB8</td>
<td>The policy is considered to be too vague to address the issues.</td>
<td>No</td>
<td>In line with the Licensing Act 2003 the SLP cannot be excessively prescriptive in a blanket manner. In addition, how the policy is enforced is an operational matter.</td>
<td></td>
</tr>
<tr>
<td>Policy 6: TENs</td>
<td>SB9</td>
<td>Propose better informing and engaging of residents in TENs process.</td>
<td>Yes</td>
<td>This has been added.</td>
<td></td>
</tr>
<tr>
<td>Policy 10: Reviews</td>
<td>SB10</td>
<td>Propose a better process for informing residents</td>
<td>No</td>
<td>This is an operational matter and not for the SLP.</td>
<td></td>
</tr>
<tr>
<td>Policy 11: Authority and DPS</td>
<td>SB11</td>
<td>Propose a forum between residents and DPS, with non-attendance a breach of licence.</td>
<td>No</td>
<td>This may be included as a licence condition if appropriate on a case by case basis.</td>
<td></td>
</tr>
<tr>
<td>Policy 12: Late Night Levy (LNL)</td>
<td>SB12</td>
<td>Propose that this is enacted in Brixton.</td>
<td>No</td>
<td>A LNL has to applied across a borough. Brixton currently has a BID which provides some of the same functions through businesses.</td>
<td></td>
</tr>
<tr>
<td>Policy 16: Dispersal and entry</td>
<td>SB13</td>
<td>Propose more specificity than 'reasonable measures'.</td>
<td>No</td>
<td>It is difficult to outline specific measures specifically that would work in all circumstances, and across all premises and areas. The expectation is that licensees will consider their specific location and circumstances and identify suitable approaches.</td>
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<tr>
<td>Appendix 12</td>
<td>SB14</td>
<td></td>
<td>Recommend a stronger focus on principle 4 (the well-being of residents) and principle 8 (minimising the impact on residents)</td>
<td>No</td>
<td>The SLP aims to maintain an appropriate balance between residents and businesses and this is reflected in the wording.</td>
</tr>
<tr>
<td>SMW Cottages Residents and Tenants Association</td>
<td>General</td>
<td>SW1</td>
<td>Notes concerns with access to information on how to address issues with licensed venues – specifically requesting a guide from the Council to support residents to undertake this and to be able to access the Licensing Team.</td>
<td>No</td>
<td>There is currently information available on the Lambeth website at the following links to assist with this: <a href="https://www.lambeth.gov.uk/business-services-rates-and-licensing">https://www.lambeth.gov.uk/business-services-rates-and-licensing</a>  <a href="https://www.lambeth.gov.uk/pests-noise-and-pollution/noise-and-antisocial-behaviour">https://www.lambeth.gov.uk/pests-noise-and-pollution/noise-and-antisocial-behaviour</a>  We will aim to make this more accessible (operational issue).</td>
</tr>
<tr>
<td></td>
<td>SW2</td>
<td></td>
<td>Note that the Licensing Team should trigger a review when a sufficient number of complaints are received.</td>
<td>No</td>
<td>Lambeth Licensing Team have operational processes to support them in triggering reviews and the process for reviews is covered in Appendix 9 of the document. Wording on reviews on website to be looked at and amended as appropriate to ensure clarity.</td>
</tr>
<tr>
<td>Violence Against Women and Girls Team (Lambeth Council)</td>
<td>General</td>
<td>VA1</td>
<td>See right</td>
<td>Yes</td>
<td>Specific stated policy now included in draft SLP on VAWG.</td>
</tr>
<tr>
<td></td>
<td>Specific</td>
<td>VA2</td>
<td>3.11. states that: 'The prevention of crime and disorder is a licensing objective due to the link between alcohol and a range of problems, including: - violence, including sexual assault; - domestic violence and abuse’</td>
<td>Yes</td>
<td>Public Health data refers to links between alcohol and violence including domestic violence. In addition, alcohol can increase the vulnerability of an individual. The original sentence on domestic violence has been removed from the document.</td>
</tr>
<tr>
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<td>REF</td>
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<td>We would like to challenge the text around links between alcohol and domestic and sexual violence. Studies have shown that perpetrators of domestic violence will commit violent acts when sober showing that there is no causal link between alcohol and domestic abuse. The majority of sexual violence happens within the context of domestic abuse. However, alcohol can be an aggravating factor for perpetrators. Please ensure this detail is captured within the policy.</td>
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<td></td>
<td>General</td>
<td>VA3</td>
<td>There is a gap in Lambeth in regards to training staff within the night time economy to respond safely to incidents of VAWG in their premises including the “Ask Angela” process. We suggest this is reviewed and that guidance is linked to within the policy.</td>
<td>Yes</td>
<td>Wording amended – training requirement is included under ‘Measures to prevent crime and disorder’.</td>
</tr>
<tr>
<td></td>
<td>VA4</td>
<td></td>
<td>In order to keep staff safe and ensure appropriate action is taken we suggest adding a positive duty on staff to call emergency services where needed in response to VAWG incidents.</td>
<td>No</td>
<td>This would be specified at an operational level within any specific guidance/ training/ reference material.</td>
</tr>
<tr>
<td></td>
<td>VA5</td>
<td></td>
<td>In order to keep staff and customers safe we suggest adding a positive duty on premises to remove/ban perpetrators from venues where needed (e.g. where someone has committed a violent offence).</td>
<td>No</td>
<td>This will be explored at an operational level and legal guidance sought.</td>
</tr>
<tr>
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<td>Sexual Entertainment Venues (SEV)</td>
<td>VA6</td>
<td></td>
<td>There is no mention of VAWG within this section. We suggest this should link to Lambeth’s Sex Establishment Policy and Conditions. We also suggest that the Sex Establishment Policy and Conditions are updated in consultation with VAWG services in Lambeth and the Lambeth VAWG Team. Further, we suggest adding a positive duty to train staff in Sexual Entertainment Venues on VAWG and for them to refer to appropriate services if employees are sexually or physically assaulted.</td>
<td>No</td>
<td>Sex establishments are governed by separate legislation. There is a separate SEV Policy and so this has been removed from the SLP document. The SEV Policy will be updated in future and the comments provided will be taken into account.</td>
</tr>
<tr>
<td>Appendix 1. Measures to promote the prevention of crime and disorder</td>
<td>VA7</td>
<td></td>
<td>This section asks ‘Are female door supervisors deployed’ with no explanation as to why. An explanation here is needed and corresponding safety advice if appropriate.</td>
<td>Yes</td>
<td>This wording was incorporated at the request of the MPS in relation to female door supervisors being available to carry out searches of female patrons. This wording has been removed from the SLP and the subject will be covered in any relevant training at operational level.</td>
</tr>
<tr>
<td>Appendix 4. Measures to promote the protection of children from harm</td>
<td>VA8</td>
<td></td>
<td>There is no reference here to Child Sexual Exploitation or training for venue staff on how to identify sexual exploitation of minors. Appropriate immediate safeguarding actions for staff to undertake when they have identified a child at risk should also be added or linked to.</td>
<td>Yes</td>
<td>Specific wording now included re Child Sexual Exploitation. Training and specific guidance would be provided at an operational level.</td>
</tr>
</tbody>
</table>