As a responsible authority under section 13(4) of the Licensing Act 2003 as amended under the Police and Social Responsibility Act 2011, the Licensing Authority have considered your application in full. The Licensing Authority has concerns in relation to this application and how the premises would promote the following Licensing Objectives:

- Public Nuisance
- Prevention of Crime & Disorder
- Public Safety
- Protection of Children from Harm

The premises are seeking to permit the following licensable activities and operational hours:

**Sale of Alcohol (On and Off Sales)**
Monday - Sunday 11:00 – 22:00

**Hours premises are open to the public**
Monday – Sunday 07:00 – 22:30

**Cumulative Impact Area (Saturation Zone)**

The premises is located within the cumulative impact area zone as identified within the Council’s Statement of Licensing Policy (‘The Policy’) on pages 26 and 58.

In accordance with the council’s statement of Licensing Policy, the premises falls within the area designated as an area of special interest in Clapham which means that applicants for premises falling within that zone must proof conclusively in their operational schedule why their application for a premises licence should be granted and it is therefore important that applicants show that they have properly considered the impact on the locality of their application.

The policy creates a rebuttable presumption that any new applications for premises licenses or club premises certificates, along with any major variations that could impact negatively on the licensing objectives will be refused, unless the applicant can demonstrate that there will be no negative impact on any of the licensing objectives.

**Classification of Area within the policy**

According to the current Licensing Policy, Appendix 1 page 46, the premises is located in a district town centre. The hours sought are within those recommended in the policy for the premises if operated as a café where sale of alcohol is ancillary to food. However, should the premises be operated as a drinking establishment, the start time recommended by the Policy is 11:00 hours on any day.

The premises have outside areas laid out for tables and chairs. Outdoor areas serving licensed premises are expected to comply with appropriate conditions to the individual premises to ensure minimal disruption to residents in proximity to the premises. There is a need for all outside spaces that are used for smoking, eating and drinking by patrons of licensed premises to be well managed to reduce the potential for nuisance to be caused to nearby residents.

Where smoking, eating and drinking takes place outside, the Authority expects applicants to provide comprehensive details in their operating schedule on:

- the location of outside areas to be available for use;
- how the outside areas will be managed to prevent noise;
- the arrangements for clearing, tables and chairs; and
• preventing nuisance from smoke fumes to residents living in close proximity to smoking areas.

District Centres are places where the night time economy does have a role, alongside other daytime shopping and other places of employment. Whilst not as big as town centres, they are generally well served by public transport and connected in numerous directions.

The key areas of concern is that whilst there might be very little residential property in the immediate area, a short walk will lead into highly residential streets and the potential for public nuisance in the form of noise, litter from late night eateries and the targeting of individuals by criminals is high.

Classification of Premises within the policy

The premises is proposed to be operated as a café with outside tables and chairs.

Operational Schedule

The application if granted as sought will enable the premises to be operated as a drink led establishment and there is insufficient information in the applicant’s operating schedule to demonstrate that application if granted will have will not impact negatively on the Cumulative Impact Zone. The patrons who have been drinking at the premises, may head towards licensed premises on Clapham High Street.

Premises operated as drink led may lead to;

• disturbance from departing patrons
• drunkenness
• violence associated with alcohol consumption.
• anti social behaviour
• noise nuisance and
• Drug misuse

Summary

As the applicant had not offered any information in the operating schedule to prove conclusively why their application should be granted. I am of the view that the application if granted will impact negatively on the cumulative impact zone and I will recommend the application be refused.

However, should the applicant be able to demonstrate to the Committee why the application should be treated as an exception to the Cumulative Impact Policy and Members are satisfied with measures that will promote the Licensing Objectives, the Licensing Authority would recommend a terminal hour of 19:00 for the sale of alcohol and the conditions below be considered should the Committee be minded to grant the application.

Tom Dunn
Licensing Officer
7th July 2020

Sale of Alcohol
Monday - Sunday 11:00 – 19:00

Conditions

1. Sale of alcohol for consumption on the premises shall be ancillary to food served at the premises.
2. There shall be no vertical drinking at the premises.
3. The premises shall install and maintain a comprehensive CCTV system. All entry and exit points must be covered enabling frontal identification of every person entering in a light condition. The CCTV system shall continually record whilst the premises are open. All recordings shall be stored for a minimum period of 31 days with date and time stamping. Viewing of recordings shall be made available immediately upon the request of Police or authorised officer of Lambeth Council.

4. A staff member from the premises who is conversant with the operation of the CCTV system shall be in the premises at all times when the premises is open. This staff member must be able to provide a Police or authorised council officer copies of recent CCTV images or data with the absolute minimum of delay when requested and within a maximum of 24 hours of the initial request.

5. Subject to Data Protection guidance and legislation, the management of the premises will ensure that key staff are fully trained in the operation of the CCTV, and will be able to download selected footage onto a disk/USB Stick for the Police or authorised officers of the Local Authority without difficulty, delay or charge.

6. CCTV Signage shall be prominently displayed throughout the premises.

7. In the event of any breakdown of the CCTV system, any correspondence and receipts relating to its repair or the replacement of parts must be kept on file for a minimum of 12 months.

8. All staff member should be checked to ensure they have the right to work in the UK. These checks should be made available upon requests to all responsible authorities.

9. An incident log shall be kept at the premises, and made available on request to an authorised officer of the Council or the Police, which will record the following:
   
   (b) all crimes reported to the venue
   (c) all ejections of patrons
   (d) any complaints received concerning crime and disorder
   (e) any incidents of disorder
   (f) any faults in the CCTV system
   (g) any refusal of the sale of alcohol
   (h) any visit by a relevant authority or emergency service.

10. Patrons shall be requested not to loiter outside the premises and to leave the premises quietly. Notices to this effect must be prominently displayed at the entrances of the premises.

11. Staff must ensure that all empty glasses and bottles are promptly cleared away from the public areas.

12. A record shall be kept detailing all refused sales of alcohol. The record should include the date and time of the refused sale and the name of the member of staff who refused the sale. The record shall be available for inspection at the premises by the police or an authorised officer of Lambeth Council at all times whilst the premises is open.

13. The premises will operate an age verification policy set at a minimum of 25 years, whereby any person attempting to buy alcohol who appears to be under 25 will be asked for photographic ID to prove their age. Logs will be kept on site to record any rejections.

14. The only form of ID that will be accepted are passports, driving licences with a photograph or Citizen card or validated proof of age cards bearing the “PASS” mark hologram. The list of approved ID may be amended or revised subject to prior written agreement with Metropolitan Police Service.
15. Signage advertising the “Challenge 25” policy will be displayed in prominent locations in the premises and shall include the point of sale and the area where the alcohol is displayed, as a minimum.

16. All staff members engaged, or to be engaged, in selling alcohol on the premises shall receive full training pertinent to the Licensing Act, specifically in regard age restricted sales, and the refusal of sales to persons believed to be under the influence of alcohol or drugs. Induction training must be completed and refresher training thereafter at intervals of no more than 12 months. All restricted sales training undertaken by staff members shall be fully documented and signed by the employee and the DPS. All training records shall remain on site and be made available upon request to the Responsible Authorities.

17. Patrons temporarily leaving the premises to smoke shall not be more than five at any time, excluding customers seated at the tables outside the premises.

18. No deliveries to the premises shall take place between (22.00) and (08.00) on the following day.

19. The premises shall undertake routine litter picks to the outside area.

20. Children under the age of 18 must be accompanied by an adult after 19.00 hours.

21. No beers, ales, lagers or ciders of 6% ABV or above to be sold.

22. All sales of alcohol for consumption off the premises must be in sealed containers only and shall not be consumed on the premises. (Sealed containers meaning manufacturers sealing of the vessel)

23. Off sales of alcohol shall be limited to delivery of alcohol ordered as part of a meal to be delivered to a customer and ancillary to that meal.

24. Any online delivery orders shall be to a registered residential or business address. There shall be no deliveries to public/communal areas or open spaces.

25. Vehicles used for online delivery should not be left idle outside the premises to ensure residents in the locality are not disturbed.

26. For all orders taken over the phone or via the internet, customers should be informed of Challenge 25 and the requirement to have ID ready for inspection should the need arise before receipt of alcoholic beverages.

27. The Premises Licence Holder shall ensure all persons associated with the handling, transportation and delivery of alcohol shall employ due care and attention at all times to ensure:

   a) The delivery vehicle engine is not left running needlessly on or off the premises;
   b) There shall be no obstruction of the public highway whilst deliveries are taking place;
   c) No persons drivers/couriers shall engage in loud talking/shouting/door slamming or emit loud music from their vehicle whilst on or off the premises;
   d) All glass bottles/vessels, goods and waste to be handled carefully whilst being transported into and out of the premises and to the clients’ address to prevent/minimise noise disturbance to residents within the vicinity.
As Lambeth Licensing & Night Time Economy Team
Civic Centre, 3rd Floor,
6 Brixton Hill,
SW2 1EG

7th July 2020

Contact: PC Mike Constable

Miss Bina Patel
Licensing Manager
Lambeth Borough Council

RE: New Grant, Black Lab Coffee House, 18 Clapham Common South Side, SW4 7AB

Dear Miss Bina Patel.

I write on behalf of the Commissioner of police for the Metropolis to make a representation on the grounds of the following Licensing Objectives:

- The prevention of crime & disorder.
- Public Safety.
- The prevention of public nuisance.
- Protect children from harm.

The applicant has requested the following:

Supply of Alcohol
Monday - Sunday 11:00 - 22:00
On and off the premises.

Location

This application is located within Clapham (this is defined as a district centre), and is referenced in London Borough of Lambeth’s Statement of Licensing Policy 2019 – 2024 appendix 7 refers.

This premises is located within a Cumulative Impact Zone (CIZ) as referenced in the policy, section 13 refers.

Statement of Licensing Policy

I would like to notify the committee the expectation for applicants as per the policy:
1.9 Each new licence application or an application for a variation of an existing licence will be considered on its own merits. This means that decisions will take into account the specific details in each case, including the proposed venue and the way it will operate, or proposed changes to an existing venue and/or its operation, as well as the context in which it operates.

5.2 Therefore, how applicants communicate the promotion of the licensing objectives in their operating schedule and application is essential for the full consideration of the application by the Authority.

5.3 Providing a full and detailed operating schedule as part of the application will make it clearer as to how the applicant will promote the licensing objectives. Applicants are expected to:
- demonstrate knowledge of the local area when describing the steps they propose to take in order to promote the licensing objectives;
- undertake enquiries about the area in which the premises are situated to inform the content of the application;
- obtain sufficient information to enable them to demonstrate, when setting out the steps they propose to take to promote the licensing objectives, that they understand:
  a) the layout of the local area and physical environment including crime and disorder hotspots, proximity to residential premises and proximity to areas where children may congregate;
  b) any risks posed to the local area by the applicants’ proposed licensable activities;
  c) any local initiatives (for example, local crime reduction initiatives or voluntary schemes including local taxi-marshalling schemes, street pastors and other schemes) they propose to put in place which might help to mitigate any potential risks.

5.5 Demonstrated knowledge about the locality will assist applicants when determining the steps that are appropriate for the promotion of the licensing objectives. For example, premises within close proximity to residential premises should consider how this will impact upon their smoking, noise management and dispersal policies, to ensure the promotion of the public nuisance objective. Applicants must consider all factors which may be relevant to the promotion of the licensing objectives, and where there are no known concerns, to acknowledge this in their application.

5.7 It is also expected that applicants will canvass the views of their neighbours and local residents as this can clear up any ambiguities and develop a relationship based on mutual cooperation before an application is made. This may be facilitated by making direct contact with neighbours and any local group that represents residents or businesses. This will also assist the applicant by giving an understanding at the outset of what the community believe is acceptable in their area.

6.1 Two general principles have been identified which are noted throughout the Statement of Licensing Policy and are outlined here clearly as general principles that will be taken into consideration for all licensing applications.

All licensing applications are expected to show:
- a) That applicants have a clear understanding of the locality in which they are operating or intending to operate and that this has been taken into account in the application, any voluntary conditions proposed and for these to be set out clearly within the operating schedule.
The applicant has acknowledged that it is within the CIZ, it is on the boundary.

Some conditions have been proposed by them as well, I have submitted some more for consideration and have not had a response back at time of writing.

The applicant states that due to the price point of their alcoholic drinks this will not have a negative impact on the area. It is believed this is not sufficient.

Conditions suitable to their business operation ‘food-led’ are required to prevent any vertical drinking. This problem will be further exacerbated

A reduction in hours, 7pm has been suggested with regards to off sales. This is to ensure that there is no opportunity for those to potentially pre-load before going to premises within the Clapham area.

We have seen recently the effects of alcohol consumption on Saturday 27th June on Clapham Common. This highlights the need for this, especially in this current climate.

**Cumulative Impact Zone**

I would like to remind the committee with regards to this:

The Queen on the application of Westminster City Council v Middlesex Crown Court [2002] EWHC 1104 (Admin) (“Chorion”)

High Court approval of cumulative impact policies came in the Chorion litigation the language of the Crown Court judge (as summarised by the High Court) is instructive:

“The first question was whether, notwithstanding the applicant was a fit and proper person and the premises would be well managed, a ... licence could be refused on the sole ground that the area was already saturated with licensed premises... and that the cumulative effect of the existing premises was impacting adversely on the area to an unacceptable degree. The answer to this [is] ‘yes’.”

Taking this into account

**Night Time Economy**

Clapham High Street is within this cumulative impact zone and (at time of writing) there are a total of 45 licensed premises in the High Street alone.

Clapham has a renowned night time economy as a result it suffers from high intoxication levels. This has led to alcohol related crime taking place. Ranging from sexual assaults, violence against the person, thefts, robberies, etc

This is of concern for Police, intoxication levels have been mentioned at weekly briefings delivered by Police to Licensed Premises fortnightly on Friday at 8pm. (This has recently stopped due to Covid 19 electronic communications are sent instead).

The Metropolitan Police have Operation Equinox running, which is a Police led operation in which officers conduct high visibility patrols across London. Police officers are
engaging with night-time economy users and premises management in a drive to reduce the number of people being put at risk harm. This is to reduce the violence with injuries directly related to alcohol. An increase in hours for this premises will strain Police resources, and most likely Ambulance Services as well.

We are all aware of the increase in violence within London, and the Metropolitan Police Service have recently announced the Violence Suppression Unit to combat this.

These figures are taken from Institute of Alcohol Studies are worth consideration:

- In 2013/14, just over half of all violent crime victims believed their attacker to be under the influence of alcohol (= approx. 704,000 incidents). 6
- 76% of police have received an injury through dealing with drunken members of the public, with 65% injured on multiple occasions. 10
- 22% of police report having been injured five or more times by drunken people whilst on duty; 41% report having being sexually harassed or assaulted by drunken people whilst on duty. 10
- The Government estimates that alcohol-related crime and social disorder costs England £11bn per year (at 2010/11 prices). 11
- The specific cost of binge drinking on police arrests has been estimated at £0.94 billion; binge drinking has increased the average number of alcohol-related arrests by 45% (= 786 additional arrests per day nationally). 12
- The number of officers on duty must be increased by around 30% at weekends as a direct result of binge drinking, carrying an estimated cost of £31 million. 12
- Police and the justice system spend £1.7bn every year responding to alcohol-related crime. 13
- Alcohol licensing has cost local authorities approx. £183 million in the 10 years since the Act was introduced (= £1.5 million of taxpayers’ money per month). 14

The full report can be read here:


**Conclusion**

- Clapham High Street is saturated. The cumulative impact of licensed premises in the area is having a negative effect. One which the residents should not have to put up with, nor should emergency services & stakeholders.
• Application submitted does not address fully how they will not have a negative impact to Clapham High Street.

• Accepted this applicant is not a NTE venue but could lead to potential pre loading and street drinking in the area.

• Consideration has been taken with regards to the impact Covid 19 has impacted businesses. A suitable and proportionate alternative has been proposed.

It is recommended that this new grant should only be granted with the suggested conditions (attached separately) by responsible authorities and the hours suggested.

This is deemed appropriate to the premises and in the spirit of the Licensing Act 2003.

Yours sincerely,

Mike Constable | PC 1596AS - Licensing & Night Time Economy Team |
Address Civic Centre, 3rd Floor, 6 Brixton Hill, SW2 1EG

11. House of Commons Health Committee, Government’s Alcohol Strategy (HC 132, 2012-13), Written evidence from the Department of Health (GAS 01).
Prevention of Crime and Disorder

1. The premises shall install and maintain a comprehensive CCTV system. All entry and exit points must be covered enabling frontal identification of every person entering in a light condition. The CCTV system shall continually record whilst the premises are open. All recordings shall be stored for a minimum period of 31 days with date and time stamping. Viewing of recordings shall be made available immediately upon the request of Police or authorised officer of Lambeth Council.

2. A staff member from the premises who is conversant with the operation of the CCTV system shall be in the premises at all times when the premises is open. This staff member must be able to provide a Police or authorised council officer copies of recent CCTV images or data with the absolute minimum of delay when requested and within a maximum of 24 hours of the initial request.

3. Subject to Data Protection guidance and legislation, the management of the premises will ensure that key staff are fully trained in the operation of the CCTV, and will be able to download selected footage onto a disk/USB Stick for the Police or authorised officers of the Local Authority without difficulty, delay or charge.

4. CCTV Signage shall be prominently displayed throughout the premises.

5. All staff members engaged, or to be engaged, in selling alcohol on the premises shall receive full training pertinent to the Licensing Act, specifically in regard to age-restricted sales, and the refusal of sales to persons believed to be under the influence of alcohol or drugs. This shall take place every 6 months.

6. All such training is to be fully documented and signed by not only the employee but the person delivering the training. Training records shall be kept at the premises and made available upon request to either Police Officers or an authorised officer of Lambeth Council.

7. All staff member should be checked to ensure they have the right to work in the UK. These checks should be made available upon requests to all responsible authorities.

8. An incident log shall be kept at the premises and retained for a period of 12 months and made available on request to an authorised officer of Lambeth Council or the Police. It must be completed within 24 hours of the incident and will record the following:
   (a) all crimes reported to the venue
   (b) all ejections of patrons
   (c) any complaints received
   (d) any incidents of disorder
   (f) any faults in the CCTV system
   (g) any refusal of the sale of alcohol and the name of the member of staff who refused the sal
Public Safety

9. No person shall be allowed to leave the premises whilst in the possession of any drinking vessel or open glass bottle, whether empty or containing any beverage.

Protect children from harm

10. All children under the age of 18 shall be accompanied by a responsible adult at all times whilst on the premises after 19:00

11. A Challenge 25 proof of age scheme shall be operated at the premises where the only acceptable forms of identification are recognised photographic identification cards, such as a driving licence, passport or proof of age card with the PASS Hologram.

12. Signage advertising the aforementioned proof of age scheme shall be prominently displayed throughout the premises with a particular emphasis on the alcohol display area and service area.

Prevention of Public Nuisance.

13. Notices shall be prominently displayed at all exits requesting patrons to respect the needs of local residents and businesses and leave the area quietly.

14. The supply of alcohol on the premises shall only be to persons seated taking a table meal there and for consumption by such persons as ancillary to their meal.

15. The supply of alcohol off the premises shall only be to persons included with a meal.

16. All sales of alcohol for consumption off the premises must be in sealed containers only.

17. Notices shall be prominently displayed at any area used for smoking requesting patrons to use the area quietly.

18. There shall be no vertical drinking at the premises.

19. The supply of alcohol on the premises shall only be to persons seated taking a table meal there and for consumption by such persons as ancillary to their meal.

20. There shall be no sale of alcohol 'shots'.

21. No beers, ales, lagers or ciders of 6% ABV or above to be sold.
Miss Bina Patel  
Licensing Manager  
Lambeth Borough Council

RE: New Grant, Black Lab Coffee House, 18 Clapham Common South Side, SW4 7AB

Dear Miss Bina Patel,

I write on behalf of the London Borough of Lambeth Public Protection team to make a representation, on the grounds of the following Licensing Objectives

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- Public Safety.
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On and off the premises.

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- undertake enquiries about the area in which the premises are situated to inform the content of the application;
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Public Protection officers are engaging with night-time economy users and premises management in a drive to reduce the number of people being put at risk harm. This is to reduce the violence with injuries directly related to alcohol. An increase in hours for this premises will strain Police resources, and most likely Ambulance Services as well.

Conclusion

- Clapham High Street is saturated. The cumulative impact of licensed premises in the area is having a negative effect. One which the residents should not have to put up with, nor should emergency services & stakeholders.

- Application submitted does not address how they will not have a negative impact to Clapham High Street.

- Later hours will encourage street drinking, and pre loading in the area

- Consideration has been taken with regards to the impact Covid 19 has impacted businesses. A suitable and proportionate alternative has been proposed

It is recommended that this new grant should not be granted as it will have a detrimental effect to the area.
Arif Kokkoz  
Public Protection Officer  
Public Protection & Regulatory Services  
Environment Directorate  
Resident Services  

London Borough of Lambeth  
Civic Centre  
6 Brixton Hill  
SW2 1EG