



Arch 196 Carlisle Lane London SE1 7LH (21/00008/PRMNEW)

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 Objective:

- Prevention of Public Nuisance

The application seeks to permit:

Sale by Retail of Alcohol (Off the premises)

Monday - Sunday 00:00 – 00:00

Hours of opening

Monday - Sunday 0000 – 00:00 (Not to the public)

Classification of Area within the policy

According to the current Licensing Policy, Appendix 5 page 51, the area in which the premises are located is deemed to be the South Bank Cultural Area.

However, the premises are located within close proximity to residential premises, which are located opposite the premises and within the surrounding areas, such as Cosser Street. The Licensing Authority also note the premises aren't open to the public and will be used for the distribution of groceries, which includes alcohol, the Licensing Authority believe it is reasonable to assume the premises will be delivering their alcoholic products to residential addresses.

As such, this representation has regard to the premises being operational within residential areas and those hours deemed necessary for a residential area, as per the Licenising Policy should apply.

Proximity to residential accommodation is a general consideration with regard to the prevention of public nuisance. The Authority will treat each case on its individual merits, however, stricter conditions will generally be considered on premises licences in areas that have denser levels of residential accommodation or residential accommodation in close proximity to them. This may include the Authority considering an earlier terminal hour than that proposed by the applicant. This is regardless of the designation assigned to the area in which the premises is situated under this policy, i.e. as a Major or District Town Centre. In such cases and where relevant representations are received, the Licensing Authority will have regard to the potential for, and the risk of, nuisance occurring to nearby residents, particularly when considering an application which proposes the conduct of licensable activities after the hours indicated in Appendix 5. It is important to stress that the terminal hours set out in Appendix 5 are intended as guidance only. The Licensing Authority may recommend or agree an earlier or later terminal hour where this is considered appropriate.

Classification of Premises and Area within the policy

The premises are seeking sale of alcohol for consumption off the premises, but the premises are not likely to be associated with street drinking or be targeted by underage drinkers, as the premises are to be operated as delivery service of groceries & conveniences items including Alcohol. The applicant has indicated there will be no customers allowed on the premises.

According to the current Licensing Policy, page 36, the Authority expects licence applications for delivery services that include the delivery of alcohol to take into account issues relating to reducing public nuisance related to delivery vehicles, ensuring the security of premises and delivery drivers, and protecting children by applying rigorous age checks at purchase point and at point of delivery.

These types of services are not provided for in the Licensing Act 2003 in any way differently from other licensed premises they do provide their own unique circumstances that need to be addressed. In particular the Authority has concerns with the potential for the following:

- Age verification at both purchase point and delivery point;
- The safety of delivery drivers at point of delivery;
- Safety of the premises from which orders are taken and sent out for delivery; and
- Possible public nuisance caused by delivery drivers collecting deliveries from the licensed premises.

The Authority is likely to place the following conditions on to a premises license for delivery services where it is appropriate and relevant to the individual license application:

- A standard age verification check shall be undertaken on entering the website.
- A signature at the point of delivery **must** be obtained from a person above the age of 18 with appropriate age verification identification. No delivery shall be left without a signature.
- Alcohol shall only be delivered to a residential or business address and may not be delivered to a public place.
- Every third-party courier delivery box shall be labelled with the words "Age Restricted Product".
- 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.
- A refusals log will be maintained for deliveries and available for inspection on request.
- Appropriate security will be in place at the premises as agreed with Police.
- Measures for minimising noise and disturbance caused by the dispatch of deliveries to be identified in the operating schedule.
- Website and all promotional material should be designed and set out in a way which is consistent with the responsible retail of alcohol.
- The Authority would expect operators to have systems in place to ensure alcohol is not delivered to problematic house parties or to people who appear drunk and, in such instances, alcohol should be refused, and that refusal recorded.

According to the current Licensing Policy, Appendix 1 page 46, there is no recommended hours in the policy for this kind of business in a residential area other than for an off licensed premises, which is 11:00 to 23:00 hours Monday to Sunday.

Conclusion

The premises are to be operated as locally based home delivery grocery centre, which includes the sale of alcohol. It is noted that any restriction on the application will be applicable to delivery of alcohol and will not prevent the delivery of other grocery items from the premises.

The applicant has proposed conditions in their operating schedule, but the hours sought are beyond those recommended in the Licensing Policy and are likely to impact adversely on residents in the area when deliveries are made from the premises, especially during unsocial hours and in the early hours of the morning.

However, should the Committee be minded to grant the application, I will recommend the application is granted with the hours 09:00 - 23:00 and the conditions below are attached to the licence in addition to those proposed by the applicant.

1. All sales of alcohol order shall be made via online platforms for delivery only and must be paid for by debit or credit card.
2. Each delivery containing alcohol shall be labelled with the words "Age Restricted Product".
3. Details of the order (including the type, amount of alcohol, name, and address of the customer) must be included with the order.
4. The details shall be shown on the printout receipt dispatched with the order. All delivery drivers and riders must allow any Police Constable or Local Authority Officer to inspect any alcohol or order details on request.
5. Alcohol deliveries shall only to be made to business and/or private residences and not to any public/open spaces.
6. All staff engage in the sale or supply of alcohol shall be trained in the prevention of underage sales, drunkenness and proxy sales before being allowed to sell or supply any alcohol. All such training to be updated as necessary, for instance when legislation changes. The training should be clearly documented and signed and dated by both the trainer and the member of staff receiving it. The documentation shall be available for inspection on request by an authorised officer of the Licensing Authority or a constable.
7. The operators shall have a system in place to ensure that alcohol is not delivered to problematic house parties, in such instances, alcohol shall be refused, and the refusal shall be recorded.
8. Orders containing alcohol may only be delivered between the hours 09:00 – 23:00.
9. No members of the public will be allowed on the premises, or be permitted to collect their order from the premises.
10. The premises are to be used as a delivery service at all times.
11. A signature at the point of delivery must be obtained from a person above the age of 18 with appropriate age verification identification. No delivery shall be left without a signature.
12. There shall be a dedicated area for delivery personnel to safely park their vehicle and collect the customer order.

Sarah Williams
Licensing Officer
9th February 2021

From: [REDACTED]
To: [Sarah G Williams](#)
Cc: [Ola Owojori](#)
Subject: RE: 21/00008/PRMNEW - Arch 196, Carlisle Lane, London, SE1 7LH
Date: 12 March 2021 15:42:28
Attachments: [image001.png](#)

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Hi Sarah,

Following our last conversation, I believe we're in agreement with what we're trying to achieve here, so as promised the amended wording:

2. Staff members packaging the order will make delivery staff aware that the order contains age restricted products
3. Details of the order (including the type, amount of alcohol, name, and address of the customer) must be accessible to any Police Constable or Local Authority Officer inspecting the order
4. The details shall be shown on the delivery drivers electronic app device. All delivery drivers and riders must allow any Police Constable or Local Authority Officer to inspect any alcohol or order details on request

I am discussing with the client whether the app can request a signature or confirmation of checking date of birth (11). Conditions 1, 5, 6, 8, 9, 10 & 12 are agreed. In terms of 7, remind me, did we agree that this would be superfluous as we have the "not to anyone drunk" Condition?

Thoughts, feedback & confirmation welcome!

Kind Regards,

Chris Nixon

Co-Ordinator, Licensing Agent | [email](#)



[REDACTED] | White Cross Business Park | South Road | Lancaster LA1 4XQ
tel [REDACTED] Direct Dial: [REDACTED] | [knight.training](#) | [REDACTED] | [map](#)

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From: Sarah G Williams
Sent: Wednesday, March 10, 2021 10:26 AM
To: [REDACTED]
Cc: Ola Owojori <OOwojori@lambeth.gov.uk>
Subject: 21/00008/PRMNEW - Arch 196, Carlisle Lane, London, SE1 7LH

Hi Chris,

Following our telephone call on the 25th February 2021, we discussed the appropriate hours being amended after the discussions with both Public Protection and the Police.

We can also agree on the hours from our rep extending from 09:00 – 23:00 to 08:00 – 00:00 if the conditions below can be agreed.

I believe the majority of conditions were agreed. Could you please confirm in writing your position on each condition below, following instruction form your client. Please note the additional wording added to condition 11 as discussed and emailed;

1. All sales of alcohol order shall be made via online platforms for delivery only and must be paid for by debit or credit card.
2. Each delivery containing alcohol shall be labelled with the words "Age Restricted Product".
3. Details of the order (including the type, amount of alcohol, name, and address of the customer) must be included with the order.
4. The details shall be shown on the printout receipt dispatched with the order. All delivery drivers and riders must allow any Police Constable or Local Authority Officer to inspect any alcohol or order details on request.
5. Alcohol deliveries shall only to be made to business and/or private residences and not to any public/open spaces.
6. All staff engage in the sale or supply of alcohol shall be trained in the prevention of underage sales, drunkenness and proxy sales before being allowed to sell or supply any alcohol. All such training to be updated as necessary, for instance when legislation changes. The training should be clearly documented and signed and dated by both the trainer and the member of staff receiving it. The documentation shall be available for inspection on request by an authorised officer of the Licensing Authority or a constable.
7. The operators shall have a system in place to ensure that alcohol is not delivered to problematic house parties, in such instances, alcohol shall be refused, and the refusal shall be recorded.
8. Orders containing alcohol may only be delivered between the hours 08:00 – 00:00.
9. No members of the public will be allowed on the premises, or be permitted to collect their order from the premises.
10. The premises are to be used as a delivery service at all times.
11. A signature at the point of delivery must be obtained from a person above the age of 18 with appropriate age verification identification. No delivery shall be left without a signature. In the exceptional circumstances that a signature cannot be obtain, then the date of birth of the person receiving the delivery shall be obtained.
12. There shall be a dedicated area for delivery personnel to safely park their vehicle and collect the customer order.

Unfortunately as we have yet to receive feedback from your client regarding the alleged alcohol sales on 9th, 10th and 15th February, the Licensing Authority still has concerns that this breach has taken place and there are no measures in place. It was explained that the app should prevent this happening.

Can you explain how this breach could be mitigated and whether there were measures in place to prevent it? Our view regarding the breaches are that we would need assurances and confidence in the company going forward that there are measures in place? Is there any protection on the website where customers are able to select grocery's but not alcohol after the permitted times. Can we please have these measures in writing?

Kind Regards

Mrs Sarah Williams
Licensing Officer
Public Protection & Regulatory Services
Environment Directorate
Resident Services
London Borough of Lambeth

Tel: 020 7926 6141

Email: sgwilliams@lambeth.gov.uk

Website: <http://www.lambeth.gov.uk/licensing/>

Items by post should be sent to:

London Borough of Lambeth, Community Safety, PO Box 734, Winchester SO23 5DG

Items for courier or hand delivery should be delivered to:

London Borough of Lambeth, Community Safety, Civic Centre, 6 Brixton Hill, LONDON, SW2 1EG

Sign up for email updates about Empire Windrush celebrations at:

<http://www.lambeth.gov.uk/empirewindrush>



Sale by Retail of Alcohol (Off the premises)

Monday - Sunday 00:00 – 00:00

Hours of opening

Monday - Sunday 0000 – 00:00 (Not to the public)

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However, the premises are located within close proximity to residential premises, which are located opposite the premises and within the surrounding areas, such as Cosser Street. The Licensing Authority also note the premises aren't open to the public and will be used for the distribution of groceries, which includes alcohol, the Licensing Authority believe it is reasonable to assume the premises will be delivering

Representation regarding licensing application 21/00008/PRMNEW by Getir UK Limited in respect of Arch 196, Hercules Road, SE1 7LD

In this representation, “Application” means licensing application 21/00008/PRMNEW by the “Applicant” (which means Getir UK Limited) in respect of the “Premises” (which means Arch 196, Carlisle Lane, SE1 7LD). “Statement” means the Statement of Licensing Policy 2019-2024 published by Lambeth Council (“Lambeth”). References to sections (for example S1.6) are to sections of the Statement.

Summary

The principal Lambeth licensing objective which the Application breaches is “preventing public nuisance”.

As a resident local to the proposed licensed premises, I object to the application on the grounds that:

- There is already considerable public nuisance from existing delivery services in the area. The proposed new venue would significantly aggravate this.
- The Application is invalid because the Applicant has failed to consult with residents.
- The Applicant’s voluntary licensing conditions fail to address adequately a number of key areas which will adversely affect local residents in terms of “public nuisance”.
- The proposed 24/7 operating hours are completely inappropriate in such a densely-populated residential area.

I have raised with Lambeth’s Licensing Team a few questions about believe that the Applicant’s compliance (or otherwise) with its Temporary Events Notices. At this stage, I am unsure as to whether there has been a breach.

Background to this representation

I live in Penhurst Place, Carlisle Lane, SE1 7LF, very close to the Premises. The Statement requires local residents’ views to be taken into account. For example, S1.6 states that licensing good practice should have a regulatory framework that “reflects the needs of local communities” and that the process should give “local residents the opportunity to have their say regarding licensing decisions that may impact upon them.” **The Applicant appears to have failed to consult with residents, which suggests that it does not have a serious commitment to the wellbeing of the local community.**

In addition, S5.3 states that “Applicants are expected to demonstrate knowledge of the local area... Undertake enquiries about the area...”. **It is hard to see how these expectations will have been met given the Applicant’s apparent failure to consult with residents.**

In addition to the Application, the Applicant has also applied for several Temporary Event Notices (TENs). While the applicant may not have been under a formal obligation to consult with residents about these TENs, it would have demonstrated goodwill. **The Applicant’s apparent failure to consult with residents about any of its various TENs demonstrates a lack of commitment to engaging with and informing the community in which it seeks to operate.**

The Statement states: “We believe that as long as licensed premises operate as compliant, well-regulated businesses and that their management act responsibly in promoting the licensing objectives; run safe, well managed venues and facilities; and engage and work with the local authority, its partners and the local community; they make a positive contribution toward building community cohesion and cultural development.”

I agree. This representation does not reflect any outright objection to delivery services or provision of alcohol. However, **the Applicant has already demonstrated an unwillingness to “engage and work with... the local community”, so it cannot be relied upon to “make a positive contribution toward building community cohesion and cultural development.”**

For example, there are existing Anti-social behaviour (ASB) linked with businesses like Deliveroo, Uber Eats and Just Eat (“DeliveryCos”), which attend several other arches in Carlisle Lane. It is not clear whether the Applicant will exclusively use drivers who are its direct employees. However, even if it intends to do so initially, **the Application contains no guarantee that it will not use DeliveryCos in the future, and this would clearly exacerbate the existing ASB problems.**

Consideration of the Application in relation to the Statement

S1.9 states that licensing “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.” The context in Carlisle Lane is that there are already several take-away food outlets, which attract a large number of delivery drivers. This is already resulting in ASB, including:

- Drivers urinating in the street (because they are forced to work long hours, for the reasons explained below, and have nowhere else to go).
- For the same reasons, a significant amount of litter dropped by drivers who eat and drink in the street.
- Noise, including late at night, from drivers shouting and revving their engines. Drivers congregate in the area, sometimes in large numbers, even when they are not collecting orders, because they know there is a chance of them receiving orders for the venues. The opening of yet another such venue can only increase the number of drivers who congregate to still higher levels.
- Noise from venues’ machinery operating late at night.
- Drivers parking in residents’ parking bays.

These problems arise because no-one takes responsibility for the drivers. DeliveryCos subject drivers to low pay and poor terms & conditions, and they treat drivers as self-employed in order to evade the responsibilities of an employer. The take-away venues have no financial incentive to provide indoor space and services for the drivers. The “app blackspots” proposed by some local businesses to discourage drivers from congregating in Carlisle Lane will only displace ASB to areas where it may be even more difficult to manage. Lambeth is unable to provide services such as public toilets and more litter bins owing to financial constraints. The result is very unpleasant working conditions for delivery drivers, and **considerable disturbance and loss of amenity for local residents. If the Application were approved, this could only get worse.** Indeed, the number of drivers congregating is likely to increase exponentially as take-away venues proliferate.

S2.10 states that “Commercial premises need to have provision in place for the collection of waste etc.” Existing venues’ provision is inadequate for the amount of waste they produce and they make no provision for drivers’ litter. As explained below, **the Applicant’s voluntary licensing conditions do not adequately address this.**

S2.12 confirms that “the Authority’s overriding duty is to promote the Licensing Objectives”, one of which is “the prevention of public nuisance”. As explained below, **the Applicant’s voluntary licensing conditions do not adequately address this.**

S3.6 acknowledges “We know from our residents that noise nuisance in a densely populated borough is a problem, especially when this occurs later in the evening and at night.” **The Applicant proposes to operate 24 hours a day, 7 days a week. These hours are totally unacceptable given that the Premises are in a densely populated residential area.**

S4.1 sets out Lambeth's "three overarching priorities, all of which are key to the aims of the Statement of Licensing Policy." One of these is that "We want to maintain safe, clean and cohesive communities across the borough." **With no guarantee that self-employed delivery drivers will not be used in the future, the Applicant has failed to address how it would keep the area clean and litter-free, given the existing litter problem from delivery drivers, which is out of control.** Given this failure to address one of Lambeth's overriding priorities, the Application should fail on that point alone, even before considering the many other problems with the Application set out in this representation.

S4.4 states that "The Authority does not consider that it is reasonable for local residents and compliant businesses to suffer because of a small number of irresponsible, poorly managed operators." **The Applicant's lack of consultation, its inadequate consideration of potential disturbance for local residents, and especially its belief that a 24/7 operation is even remotely acceptable in this location, all indicate that it may be such an irresponsible operator.**

S5.3 sets out the importance of "a full and detailed operating schedule" and lists a number of requirements expected of applicants. The Applicant's operating schedule consists of nothing more than one date, nine words (with one spelling mistake) and one tick. There is no evidence that the Applicant has met any of the list of expectations. **The Application should be refused owing to the Applicant's derisory operating schedule and its apparent failure to meet any of the expectations set out in S5.3.**

S5.7 states "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." **There is no evidence that the Applicant has carried out any such research and therefore the Application should be refused.**

S5.28 and S5.29 state "The Authority will interpret nuisance in its widest sense and takes it to include such issues as noise... litter, human waste (such as vomit and urine)... and anti-social behaviour. Noise nuisance is the most common problem. It is particularly intrusive at night when ambient noise levels are lower, and residents are trying to sleep". **I call on Lambeth to apply that wide interpretation and to deny the Application given the Applicant's apparent failure to know the local area and its clear failure to address potential problems.**

S5.34 states that "the Licensing Authority will have regard to the potential for, and the risk of, nuisance occurring to nearby residents, particularly when considering an application which proposes the conduct of licensable activities after the hours indicated in Appendix 5." Those hours are 11am to 11pm. **The Application should be denied given the Applicant's total disregard for Lambeth's acceptable operating hours.**

S6.1 states "All licensing applications are expected to show... 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 Application clearly fails to comply with this and should therefore be refused.**

In any case, **the Application fails on a technicality since the voluntary conditions are not included in the operating schedule.**

As mentioned above, I have raised questions about the Applicant's compliance (or otherwise) with various TENs. If the Applicant has breached its TENs, this would clearly indicate the Applicant's unsuitability to hold an alcohol licence. However, at this stage, those matters are still at the investigation stage and I do not make any allegation of breaches.

Consideration of the Applicant's voluntary licensing conditions

The Applicant states that "Drivers will await deliveries by waiting in an internal section of the premises until such time as a delivery is ordered. Staff on site will ensure that no excessive noise is created by the drivers when leaving, entering or smoking outside the Premises".

There is no mention of the maximum number of drivers that will be based at the Premises at any one time and the extent to which their 21m² waiting area will be sufficient for the drivers and their equipment e.g. crash helmets. There is no detail about the monitoring of noise by staff: how many staff will have this responsibility? Will the relevant supervisory staff be on-site at all times when the Premises are in operation? Will the supervisory staff be stationed outside at all times (if not, how else can they monitor noise outside)?

There is no mention of supervisory staff monitoring other potentially problematic driver behaviour such as littering, parking in residents' parking bays or urinating in the street. Will there be suitable dining and toilet facilities inside the Premises? If so, will that reduce the number of drivers who can be accommodated inside?

The Applicant states that "Deliveries will only be made using electric or non-motorised vehicles, when a delivery vehicle is utilised". I presume this refers to deliveries to the Applicant's customers, in which case this is welcome. However, where will they park when not in use?

The Applicant states that its incident log will record "All ejections of patrons". This appears to contradict statements elsewhere in the Application that "THERE WILL BE NO PUBLIC ACCESS TO THE PREMISES". There is no mention of the expected amount of waste that will be generated, how the Applicant will ensure that drivers congregating in the area use its bins, the volume of waste bins that will be provided, how frequently they will be emptied, nor any commitment to carry out litter picking patrols.

I understand that Lambeth is now required to hold a hearing of the Licensing Sub-Committee and I look forward to receiving good notice of the hearing.

[REDACTED]

From: [REDACTED]
To: [Licensing](#)
Subject: Re: Objection to Licensing Application 21/00008/PRMNEW by Getir Ltd
Date: 11 February 2021 23:09:30

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Representation regarding licensing application 21/00008/PRMNEW by Getir Ltd - Arch 196, Hercules Road, SE1 7LD.

I am writing to object to the licensing application by Getir Ltd regarding the above address. I am a local resident from Penhurst Place SE1 7LF - [REDACTED] - where I live with my partner and young children. I believe that this application breaches key elements of Lambeth's statement of licensing policy. If granted it would significantly aggravate existing problems suffered by local residents linked to food delivery operations in the arches on Hercules Road.

I have read Lambeth's statement of licensing policy which sets as a key goal **preventing public nuisance**. Existing delivery operations in the adjacent arches currently cause significant public nuisance. Recent examples include: excessive littering by drivers (regular litter picks by residents are not sufficient to address this); urinating in the street by delivery drivers because toilets are not provided; noise disturbance at night - even though existing operations are not meant to operate 24/7; blocking of residents parking spaces. There have also been examples of threatening behaviour by drivers to residents.

By proposing a 24/7 operation, directly opposite a residential area, with no adequate assurance about how problems such as the above would be avoided, **this application will exacerbate an already difficult situation for local residents creating further public nuisance and loss of amenity**. I am concerned about three elements in particular:

- a. The proposal to operate 24/7: this is inappropriate in a densely populated residential area. It risks causing noise disturbance throughout the night linked to congregation of drivers. This is difficult and disruptive so close to where we live. Kids need to sleep and get up for school!
- b. Public nuisance - no explanation about how problems that we have experienced from other delivery companies in the arches will be avoided. In particular this happens because companies use self-employed drivers and do not provide amenities eg toilets and waste disposal to avoid negative impact on the local community. As a result we see excessive littering by self-employed drivers, urinating in the street, blocking residents' spaces. Granting Getir's application is likely to exacerbate these issues given that no consideration has been given to avoiding these problems and impact on the local community.
- c. The fact that the applicant has not consulted local residents gives me no confidence that they would take local considerations into account, seeking to

mitigate adverse impact of their operations on us.

Overall I believe that the application offends the Council's licensing objective of preventing public nuisance and believe that it should be rejected on these grounds. I look forward to receiving an invitation to any hearing in due course.

Sophie Honey
11 February
Penhurst Place
[REDACTED]

From: [REDACTED]
To: [Licensing](#)
Subject: Objection to Licensing Application DSFX161072577796 by Getir UK Ltd; Reference 21/00008/PRMNEW
Date: 12 February 2021 12:42:30

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■ Penhurst Place
Carlisle Lane
London
SE1 7LF

Friday February 12th, 2021

Dear Lambeth Licensing Team,

Re: Licensing Reference 21/00008/PRMNEW / Licence application DSFX161072577796

I am writing to object to the licensing application by Getir UK Limited in respect of arch 196, Hercules Road, SE1 7LD.

My objection is on the basis that it will not be possible to run licensed premises on this scale; from this site; and on the conditions currently proposed without breaching all four of the licensing objectives.

- There are residential properties to both the front and rear of Arch 196. A 24/7 licence to sell and distribute alcohol from a property in such a densely populated area will be a source of considerable, continuous nuisance. Restaurants, public houses and off-licenses are not typically permitted to operate licensed activities 24/7 in residential areas and the broader economic benefits to the community of allowing such unfettered operation cannot possibly compensate for the disruption and nuisance that will be caused.
- There are no provisions for off-street parking for the tens of delivery vehicles that will converge on the property at peak times, meaning they will obstruct public highways and parking bays where residents pay for the right to park. This too will be a considerable source of nuisance. The traffic disruption caused by delivery vehicles serving similar catering establishments on Carlisle Lane is already well-documented. The failure to mitigate this in any way in the conditions attached to the application should disqualify the application immediately. This omission on the part of the applicant also demonstrates that they have not followed Lambeth's Statement of Licensing Policy requiring applicants to "demonstrate knowledge of the local area" and to "undertake enquiries about the area"; and for applications to "reflect the needs of local communities".
- Provisions for indoor waiting areas (for say 20 to 30 drivers at a time) are inadequate

and insufficient to prevent delivery drivers congregating outside people's homes. This too will be a considerable source of nuisance to local residents. There are no guarantees in the application (i.e. limits on the number of drivers attending the premises at any one time; express prohibitions on waiting outside the premises) that drivers will not spill out onto and congregate on the street.

- Provisions for toilet, changing and waste disposal facilities for the scores of drivers that will come and go every day as a result of these licensed activities are wholly inadequate (with or without future social distancing requirements). This will only exacerbate current (well-documented) problems with litter, vermin and human waste on Carlisle Lane and Hercules Road. As well as being a nuisance, this has implications for public health and child safety.
- There have been documented cases of delivery drivers operating out of the arches on Hercules Road and Carlisle Lane threatening, intimidating and harassing local residents, as well as trespassing on private property. A further (no doubt considerable) increase in the number of delivery drivers to and from the arches can only increase the threat to public safety and contribute to a worsening of crime and disorder. The applicant demonstrates no awareness of this in their application and has made no attempt to mitigate it through measures such as adequate indoor facilities for drivers and policies governing the behaviour of delivery drivers (i.e. express prohibitions on them gathering / smoking outside the premises; parking in residents' parking bays; or blocking footpaths and highways).

Without substantial amendments to the application, it must be clear that this is a wholly unsuitable location and property for such unrestricted licensed activities.

The lack of detail; the absence of conditions likely to facilitate compliance with the licensing objectives; and the failure to consult with local residents indicates that this is a frivolous application. Minimal, box-ticking conditions such as a commitment to post links on the company's website "to the 'drink aware' and 'alcohol concern webpages'" demonstrate that no serious effort has been made to comply with the licensing objectives or to understand the specific needs of local residents and the wider community.

I look forward to confirmation of receipt of this email and to hearing what steps will now be taken to consult with residents.

Yours sincerely

Paul Hoskins

