

11<sup>th</sup> July 2020

To: City of London Licensing Team  
Markets and Consumer Protection  
PO Box 270  
Guildhall  
London EC2P 2EJ

Sent by email to: [licensing@cityoflondon.gov.uk](mailto:licensing@cityoflondon.gov.uk)

Application to vary a Premises Licence  
Daisy Green  
2 London Wall Place  
London  
EC2Y 5AU

Dear Licensing team,

I write to OBJECT to the above application by Daisy Green Foods for off-sales between the hours of 11:00 and 20:00 Monday to Sunday on the basis of the prevention of public nuisance.

Important to remind us before laying down the arguments that the cafe-bar chain markets itself as the leading and premium all-you-can-drink prosecco bottomless brunch establishment strongly pushing pre-noon binge drinking with a veil of healthy snacking for the Instagram generation.

I am a resident of the Roman House development of 90 apartments, adjacent to the London Wall Place 2 building, and the license holder Daisy Green.

It is with regret that despite the promise of the London Wall Place development to engage in advance on licence matters with the Barbican Residents Association and myself as an informal voice of Roman House (while lacking of a formal association), they chose to not consult with residents in relation to this variation application.

Daisy Green's application for an off-premises sales licence 7 days a week was rejected when the original licence was granted in the summer of 2019 on the basis that the licensing principle concerning public nuisance would be infringed if off sales were permitted .

Less than 1 year ago, the licensing committee recognised that the premises are situated in the grounds of London Wall Place ,very close to the Barbican residential estate and particularly that they are proximate to the residential building Roman House.

The premises are therefore close to hundreds of flats and houses in the Barbican Estate and the Roman House development. Given the potential for noise, litter nuisance and anti-social behaviour, it was decided at the original hearing that the 'supply of alcohol would be restricted to on the premises'.

The Roman House design of the flats mean that there are top- to-bottom and left-to-right windows and virtually no external walls other than a metallic frame, leaving very limited noise insulation. The City is responsible to ensure that the residents of the residential block of flats it allowed to be built are able to live a normal life with no nuisance of loud noise, loud drunk people, bottles being emptied in bins, drunk people walking around in the very open public spaces of the area, until late in the night. Because of the same design, most of us live with very high temperatures internally very commonly more than 30C, on day and night. This major design flaw means that we have to live with open balconies, to get respite from the heat.

Last year the committee not only refused an off sales licence but also restricted the sale and consumption of alcohol in the external area of the premises to 21.00 (and allowing smoking until 21.30).

Since then the Corporation of London has completed its works in the area immediately between the Daisy Green premises and Roman House, installing large areas of grass and a very large amount of public seating making it more convenient now for people to gather and consume alcohol in that area. The public seating is not only in the form of 20+ benches but also the roman amphitheatre style seating around the church ruins themselves, which can have an estimated 20-30 people seated down too, about 2 metres away from the licence holder.

The seating benches installed have already been the cause of public nuisance, as they have attracted many different groups of skateboarders who use the benches to perform on. The City of London has acknowledged this as has thus replaces some aspects of the benches in order to make them less conducive to skateboard acrobatics.

Allowing off-premises sales would increase the likelihood that more people consuming alcohol and causing disturbance in areas adjoining the external area of the licensed premises where they would not be subject to the licensee's control and are likely to be closer to the residential areas .There would be nothing to prevent people who have purchased off licence from drinking in London Wall Place and/or the other nearby open spaces including: The publicly accessible Salters' Hall Gardens, the St Alphage Gardens, the London Wall Place public areas, all within 5-10 metres from the license holder.

Given that an off-sales license seven days a week was rejected for this cafe-bar only last year I recommend that it remains in place. Maintaining the current licensing arrangements is all the more important since the completion of attractive seating right next to the cafe-bar. This will only make it easier for people to gather and consume alcohol with the greater opportunity for public nuisance.

For clarity, my objection is to sales in any type of container, deemed closed or open; this is because the difference between the two is not meaningful in the modern manner of alcohol preparations, products and serving. It is increasingly the norm for license holders to sell alcoholic beverages including cocktails pre-made in bottles, or for pints of beer to be served in capped pint glasses, making them technically closed but aimed for on-the-spot consumption.

Do note that Environmental Health and the City Of London Police both objected to the license last year, mentioning:

"Noise associated with this type of activity is not part of the current character of that area and residents of Roman House and of Andrews House on Fore Street would have line of sight to the external drinkers [...] noise from people stood outside whilst drinking is likely to cause disturbance to neighbouring residents.." and "it is our belief that if granted it would undermine the Licensing Objectives of the prevention of crime & disorder and public nuisance."

Yours sincerely,

Dr Dimitri Varsamis  
[REDACTED] Roman House  
Wood Street, London,  
EC2Y 5AG