

Apartment ■ Temple House
6 Temple Avenue
London
EC4Y 0DF

04/01/15

Application For A New Premises Licence
Contemporary Pub Company Ltd
6 Carmelite Street, EC4Y 0BX

Dear Sirs,

I write with reference to the above New Premises Licence Application.

I wish to **OBJECT** to this wholly unsuitable application in the strongest possible terms. I am an extremely concerned resident of Temple House, with my bedroom window located a mere 25 yards from the applicant's front door. The application is to be set in the context of being located adjacent to two large residential blocks, Temple House and Victoria House, combined totalling some 60 separate apartment blocks.

Set in the context of the City of London Licensing Act 2003, I consider each of my objections under the relevant Licensing Objectives;

The Prevention of Crime and Disorder

Given the hidden location of the property from passing traffic/police surveillance and quiet surrounding streets, I would suggest that this area is wholly unsuitable for the policy of Designing Out Crime, especially that caused by late night alcohol consumption. There has been an increase year on year of crime and anti-social behaviour, fuelled largely by alcohol in the area and further potential problems do not need to be permitted.

The property is not suitable for a pub/wine bar due to its poor, hidden location (evidenced by the fact that it has never let) and significant surrounding competition and to make the proposal financially viable, I imagine the operator will be looking to run a significant number of "Promoted Events" taking the form of cheap drink offers and later opening hours, events/DJ nights etc encouraging irresponsible drinking and exacerbating anti-social behaviour. Clearly, holding Promoted Events in this location is completely inappropriate.

Public Safety

Most of my comments in this regard are covered below in respect of the increasing crime and anti-social behaviour in the area. This is a serious cumulative issue and further late night licensing is not needed.

The Prevention of Public Nuisance

The applicant proposes a ground floor and lower ground floor pub and wine bar with a "total capacity of 130 all seated or up to 330 for standing functions" (confirmed from the applicants website). Despite food being for sale, clearly there is nothing preventing alcohol sales being the predominate driver of the operation. Indeed, the operation is described as a "Contemporary pub". The lower ground floor is marked as a 'wine cellar' on the applicants plan with no reference to any associated restaurant use and interestingly the kitchen area is very small. Clearly what we are being asked to comment on is a large scale pub and wine bar, potentially selling a bit of food on the side, despite all the fancy descriptions and marketing spin.

The applicant is seeking funding for the operation through "crowd funding" and will have little regard to the residents and local community, this being one of a series of chain pubs/wine bars that are planned to open. This has already been evidenced through the planning application process whereby initially the applicant sought to have large windows that opened thereby clearly ignoring the impact on the neighbouring residents. Indeed, upon inspection of the applicants website, there is a clear business plan to sell the Company within 4 years and 'max out' the return to investors as quickly as possible.

The scale and nature of the application is wholly inappropriate for the area. The location is a stones throw from two large residential blocks, Temple House and Victoria House. Combined, there are 60 apartments across the two blocks. The bedrooms of a significant number of apartments are located no more than 25 yards from the applicant's front door.

Whitefriars is designated as a residential area in the City of London Local Plan and residents have a right to quiet enjoyment of their property. Residents already experience isolated instances of disturbance from the wine bar opposite Temple House, Tempio, and the surrounding pubs, Jamie's and The Harrow. There have been numerous occasions when residents have contacted the Environmental Health and/or The City of London Police departments, often out of hours, to report such noise disturbances and this is an ongoing issue. During my 8 years of living at Temple House, there has been a clear increase in anti social behaviour and late night issues, nearly all alcohol related. This has included numerous fights involving anywhere between 2-6 people, on occasion threatening to kill each other and security people coming out of the neighbouring office buildings and calling the police. There is a constant issue of people urinating in doorways, vomit and instances of blood, all caused by the affects of alcohol. Unfortunately, there has also been a noticeable drop in the street cleaning service and therefore the effects of alcohol are even more obvious. These instances are all outside what a resident should reasonably accept and I believe licensing should reflect the effects of gradual accumulation of licensed establishments. Given the scale and nature of the proposal, licensing should not be looking to encourage people to come into the area at unsociable hours. Residents will rightly ask, why do we need yet another licensed premises in the area, (potentially stretching already heavily burdened emergency services further) especially one that obviously has so little regard to residential amenity.

Further potential disturbance does not need to be encouraged.

The City of London is home to relatively few but strongly established pockets of residential communities. It is important to note the unique locational characteristics of the area. The application area is naturally quiet in the evenings with very little footfall after 7pm and

virtually none at the weekend with all of the Licensed Premises closed. Noise is however particularly exaggerated on the Tallis St frontage by the narrow, high sided buildings trapping sound and funnelling it upwards. Any isolated noise late at night is made by the surrounding pubs and wine bars, all of which are shut by 11pm at the very latest.

With regard to the current application, it is impossible to design or condition out any noise by customers leaving the premises late at night/in the early hours of the morning. This is particularly true of any large scale establishment serving alcohol, irrespective of whether there is food offered. As we all know, simply asking a drunken person to "leave quietly please" or putting up a polite notice, has little or no impact and is an insufficient solution. This is irrespective of the "type" of customer that the operator is looking to attract- people of all ages and background cause noise when intoxicated.

The proposed hours are not in keeping either with the surrounding residential area nor the other competing licensed establishments. Most competing licensed establishments are closed or nearly empty by around 22.00 and are shut at weekends. it is not understood why the applicant would need a licence until midnight (00.00) and to trade at the weekends especially in such a quiet, sensitive residential area? Indeed, many of the premises on the heavily commercial Fleet St have shorter hours than those proposed by the applicant. It can only be speculated that they are targeting the "drunk market" in great volume who are circulating the area looking for "one last drink". As The City of London will recognise, the risk of disturbance to local residents is greater when licensable activities continue late at night and into the early hours of the morning. The risk of drunken customers leaving the premises in the early hours of the morning is clearly not acceptable and the only true helpful condition that can be applied is limiting the licensing hours.

At the moment, a number of disturbances are caused by those keeping anti social hours and using the smaller streets around the subject area as a way through to the embankment and crossing the river. If the proposed licensing hours are granted, this will be a real "find" for those wishing to continue their anti social behaviour.

All of the competing licensed premises have self contained areas for customers to smoke and potentially drink outside. The applicant hasn't given this any thought in the application. Potentially intoxicated customers could stand directly under resident's windows given the location of the Barclays Cycle Hire docking station and narrow pavement outside the entrance, talking loudly, smoking and drinking until midnight (00.00). This is clearly not an acceptable position.

The impact of traffic going to and from the licensed premises would also be considerable, given the proposed licensing hours. The increase in number of taxis arriving in a residential street would be particularly intrusive at night when ambient noise levels are much lower.

An important point to consider is that by 2016 there will be a new road layout when the major introduces bike lanes in the area. Tallis St will become a main through route for traffic to the embankment. Deliveries in a small road will impact on traffic flow. Deliveries at night will impact on residents.

Finally, a similar point can be made regarding existing deliveries and refuse collection. I would expect that given the large volume of waste (beer bottles, food waste etc) generated,

that refuse will need to be carefully managed and more importantly, delivery times are controlled so as not to disturb residents.

Respectfully I would ask that licensing is restricted to Monday-Friday only and between the hours of 12- 10 pm. Given the residential adjacencies and surrounding licensed premises, there is no need to extend licensing beyond these times.

The City of London should be looking to encourage residential and commercial uses to co-exist with the understanding that residents amenity is protected in the evening and early hours of the morning. As you will be aware, The City of London Corporation Statement of Licensing Policy recognises in the regard to the current residential community that "it is vital that their residential amenity is protected". This is also emphasised in the Unitary Development Plan, where one of the aims is to "Protect and improve the existing stock and encourage additions to it in suitable locations". With respect to these statements, I would propose that rather than encourage more residential development, applications such as the above are more likely to drive residents away from The City as this sort of licensing is wholly incongruous within an established residential area. Such licences would surely be more suitable to already established late night entertainment areas such as Liverpool St.

Speaking both personally and on behalf of many residents, some of whom have young children, some of whom aware elderly, I would like to reiterate the huge reduction in quality of life that granting such an application would have on the residents of both Temple House and Victoria House. Many of the residents have high pressurised jobs working long hours and would see their relaxation time permanently altered and affected by a completely unsuitable proposal that could not adequately, in my opinion, be controlled by condition.

As mentioned, The City is a unique environment whereby business, commercial and residential users all co-exist together. To maintain this and indeed promote further pockets of residential development in suitable locations, residents must be able to enjoy their premises without fear of completely unjustifiable disturbance and late night alcohol related problems. Such a proposal would no doubt drive out many residents and discourage further City living, especially when such a use could be contained in an alternative already established commercial City location.

General

The applicant is seeking to sell alcohol both on and off the premises up until midnight, including on Saturday (00.00). Again, the question must be asked why the applicant feels there is a need to be allowing customers to potentially take away alcohol into the streets at 00.00? Exactly what sort of clientele does this encourage and in light of the comments above, does this highlight an applicant that has though through their proposal with due regard to the neighbouring residents?

Regrettably, in the event that the applicant is successful, I have given further thought to relevant conditions that need to be applied to any premises licence;

The Prevention of Crime and Disorder

MC02- There shall be no promoted events on the premises. A promoted event is an event involving music and dancing where the musical entertainment is provided at any time between 22.00 and 08.00 by a disc jockey or disc jockeys one or some of whom are not employees of the premises licence holder and the event is promoted to the general public.

Suggested additional conditions;

There shall be no "one off/individual" extension of licensing hours for private hire (e.g. Private party) or at certain times of the year (e.g. Christmas or new year).

Public Safety

MC11- All glasses in use at the premises shall be either toughened glass or polycarbonate material

MC12- No drinks of any sort are to be supplied to customers in glass bottles

The Prevention of Public Nuisance

MC14- Loudspeakers shall not be located in the entrance lobby or outside the premises

MC15- A written dispersal policy shall be in place and implemented at the premises to move customers from the premises and the immediate vicinity in such a way as to cause minimum disturbance or nuisance to neighbours.

MC16- Prominent signage shall be displayed at all exits from the premises requesting that customers leave quietly.

MC17- Customers permitted to temporarily leave and then re-enter the premises e.g. to smoke, shall not be permitted to take drinks or glass containers with them.

MC19- The licence holders shall make available a contact telephone number to nearby residents and the City of London Licensing Team to be used in the event of a complaint arising. A senior member of staff will deal with any complaints immediately.

Suggested additional conditions;

Proposed opening hours;

Sale and supply of alcohol (for consumption on the premises only)

Monday to Friday: 12.00- 22.00

Provision of regulated entertainment, including recorded music and films

Monday to Friday: 12.00- 22.00

Provision of late night refreshment

Not permitted

Proposed trading hours (i.e. Overall opening hours)

The premises would be open during the following hours:

Monday to Friday: 12.00- 22.00

No amplified music or noise shall be audible outside the premises. The only music provided will be recorded background music.

During opening hours, smokers will be encouraged and directed, both by clear signage and trained members of staff, towards a designated, clearly marked area by way of a barrier partition to be located to the Carmelite St frontage ONLY. Customers are to be clearly discouraged from smoking along the Tallis St frontage by signs and staff regularly checking.

There is to be absolutely no outside seating or tables in connection with the licence.

No customers shall be allowed to take drinks outside the premises at any time. Staff will be trained to ensure that they are aware of this condition and a sign will clearly state that no drinks are allowed outside at any time.

All Entrance Doors (including service doors and disabled access) are to be kept closed at all times, subject to customers entering and exiting the premises.

No deliveries will take place between 22.00 and 10.00 on any day of the week to avoid disturbing residents.

There will be an allocated designated area for rubbish within the building at street level on the Carmelite St frontage, not on the pavement.

General

MC27- Alcohol shall be sold to customers by waiter/waitress service only.

MC28- There shall be no sales of alcohol for consumption off the premises.

MC29- There shall be no self service of spirits on the premises.

MC32- No entertainment, performance, service, or exhibition involving nudity or sexual stimulation shall be permitted.

Yours faithfully,

James Honeyman