

STATEMENT OF LICENSING POLICY

Issued under Section 5(1) of the Licensing Act 2003

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Foreword

As the Cabinet Member with responsibility for licensing, I am pleased to introduce this updated Statement of Licensing Policy for the Royal Borough of Greenwich. Licensing is a vital part of how we shape and manage our borough, ensuring it remains a safe, vibrant, and welcoming place for residents, businesses and visitors alike.

Greenwich is a borough of culture, creativity and opportunity. From historic town centres to fast-growing districts like Woolwich, Thamesmead and Eltham, our hospitality and entertainment sectors play an essential role in our local economy and the life of our communities. Licensing provides the framework that allows these sectors to prosper, ensuring businesses can trade responsibly while protecting residents and the wider public from harm.

This policy sets out how we will continue to support inclusive growth while upholding the highest standards of public safety, community protection, and business accountability. It aligns closely with the ambitions of the *Our Greenwich Plan* and *Inclusive Economy Strategy 2024–2034*, helping to foster thriving town centres, support good local jobs, and create culturally rich destinations, particularly where alcohol is ancillary to a broader offer such as food, performance, or community activity.

We are also taking further steps to ensure our licensing framework contributes directly to our borough-wide ambition to reduce male violence. As part of this policy, we are setting clearer expectations for licensed venues to adopt proactive safeguarding measures, respond effectively to incidents, and create safe and respectful spaces, especially during the evening and night-time hours.

We recognise the continued need for robust licensing controls in areas where there is clear evidence that the cumulative number of licensed premises is putting pressure on public services or undermining the licensing objectives. Our Cumulative Impact Zones (CIZs) remain a necessary and proportionate tool, ensuring that any new proposals in these areas meet enhanced standards and demonstrably benefit the local area.

At the same time, we are mindful of the challenges facing the hospitality and cultural sectors, from rising costs and staffing shortages to shifting public expectations. The Royal Borough remains firmly committed to backing responsible businesses, reducing unnecessary regulatory burdens, and ensuring licensing policy works as an enabler of sustainable growth. That is why we will soon be embarking on the development of a long-term *Evening and Night-Time Strategy* for the borough. Once complete, that strategy will inform a further review of this licensing policy to ensure it reflects our future vision for the Royal Boroughs evening and night-time environment.

The policy revisions we have made in this latest version of our policy are therefore an important step forward. but also a bridge to a wider programme of strategic reform. We remain committed to working with local communities, businesses, responsible authorities, and partners to ensure Greenwich remains a borough that supports innovation and enterprise while protecting what matters most, people, places, and public safety.

Cllr Rachel Taggart-Ryan
Cabinet Member for Community Safety and Enforcement
Royal Borough of Greenwich

Background information about Royal Greenwich

Royal Greenwich lies along the south bank of the River Thames between Deptford and Thamesmead and has an area of 5,044 hectares. The borough is bounded by the London boroughs of Bexley to the east, Bromley to the south, Lewisham to the west and across the River Thames to the north lie Tower Hamlets, Newham, and Barking and Dagenham. The population of Royal Greenwich in the 2021 census was 289,100, this has increased by 13 per cent since 2011.

Woolwich is the borough's largest shopping and office employment centre, and Eltham is the second-largest. Maritime Greenwich, which includes Greenwich Town Centre and Greenwich Park, is a World Heritage Site and a major visitor destination, beautifully complemented by the stunning riverside, offering picturesque views and unique recreational opportunities. There are a variety of entertainment, leisure and cultural venues around Royal Greenwich including The O2, Greenwich Odeon at Greenwich Peninsula, and Charlton Athletic Football Club.

Royal Greenwich is a destination that is known around the world and tourism plays a vital role in the borough's local economy. The borough plays host to a wide range of cultural events, some of London-wide significance – like the Greenwich and Docklands International Festival, the London Marathon, and the International Tall Ships Races. It has an unrivalled collection of museums, galleries, architecture and open spaces, that attracts around 20 million visitors every year. The borough's tourism industry supports 17,000 jobs and generates £1.5 billion for the local economy.

The borough is a dynamic and vibrant area undergoing rapid transformation as a result of some of the largest regeneration schemes in the capital. It has seen over £1.3bn investment made in the last 10 years, with a further £1.8bn planned over the next decade. Key projects include building 1,750 new homes for local residents on our waiting lists, improving and upgrading our existing housing stock, creating new homes and jobs in Thamesmead and Charlton, and the regeneration of Woolwich and Plumstead town centres.

Our vision for Royal Greenwich is to have a flourishing economy that creates investment opportunities for businesses and communities to grow in an inclusive and sustainable way. We're championing the shift to a green, low carbon and digital economy and using our locational strengths to attract and support high growth and innovative businesses that will create good, skilled jobs for local residents.

Royal Greenwich has good transport infrastructure including the DLR and the Elizabeth line, with Docklands, the City and West End all within easy reach. The Council plans to make further improvements to local transport connections by lobbying for an extension of the Docklands Light Railway (DLR) to Thamesmead.

The Royal Borough of Greenwich is also delivering major improvements to the way in which local services are delivered. The Royal Borough of Greenwich is launching eight new pioneering Emotional Wellbeing Hubs in schools to support young people. The borough is also home to multiple modern leisure and community facilities and further improvements are planned, including a state-of-the-art new leisure centre in Woolwich town centre.

I Licensing Policy in Royal Greenwich

- I.1 The licensing policy was previously reviewed in 2020 and published in January 2021. This current version was subject to public consultation during 2025 and published in January 2026, fulfilling the statutory five-year review requirement.
- I.2 Under the Licensing Act 2003, the Royal Borough of Greenwich has a duty to publish the licensing policy. RBG will adopt the policy when it considers licensing applications from businesses that:
- sell or supply alcohol;
 - provide entertainment;
 - sell hot food or drink between 11:00pm and 5:00am.
- I.3 This revised Statement of Licensing Policy sets out the way in which The Royal Borough will consider applications for such licences.
- I.4 Licensing is an essential tool to protect the public and support responsible businesses operation and growth within the Royal Borough. The Council does recognise the importance of unnecessary regulatory burden, and this policy is provided to support applicants, residents and responsible authorities understand the local context and application of the Royal Borough's approach to licensing under this Act. The policy is intended to strike a balance between encouraging innovation and protecting residents, workers and visitors. Every effort has been made to ensure the latest version of this policy is practical, proportionate and accessible to a range of users.

Review & Consultation of Licensing Policy

- I.5 On review of the policy statement, the Royal Borough will consult with:
- The Chief Officer of Police for the area;
 - The Fire & Rescue Authority;
 - The Public Health Body;
 - Greenwich Safeguarding Children Partnership;
 - Local Community Safety Partnership;
 - Trading Standards;
 - Environmental Health;
 - Planning;
 - Home Office Immigration Enforcement;
 - Bodies representing local holders of premises licences;
 - Bodies representing local holders of club premises certificates;
 - Bodies representing local holders of personal licences;
 - Bodies representing businesses and residents in the Borough;
 - Bodies representing local faith groups;
 - Neighbouring Local Authorities.
- I.6 The Royal Borough will also seek to consult with local residents, licensees within the proposed saturation policy areas, Councillors, Members of Parliament (MPs), the Greater

London Authority, and other bodies, on matters relating to its Statement of Licensing Policy, as it considers appropriate.

- 1.7 All responses received during the consultation will be carefully considered as part of the policy review. These views are valuable in helping us evaluate the current policy's effectiveness and identify areas for potential refinement. While it may not be possible to implement every suggestion (for instance, those based on personal preference or moral stance outside the scope of the Licensing Act 2003), all feedback will be read, and actionable points relevant to the licensing objectives and legal framework will be given full consideration for inclusion in the revised policy.

2 Introduction

- 2.1 This Statement of Licensing Policy, as prepared under Section 5 of the Licensing Act 2003 ('the Act') and the amended Guidance issued under Section 182 of the Act, sets out how the Royal Borough, as the Licensing Authority, seeks to promote the licensing objectives. Revisions to the policy and its publication were approved by The Royal Borough on December 2025. This revised Policy is operative from 7th January 2026 until 6th January 2031.
- 2.2 The Policy relates to all those activities identified as requiring a licence under the provisions of the Act, namely:
- Retail sale of alcohol;
 - Supply of alcohol to club members;
 - Provision of 'regulated entertainment' – to the public, to club members, or with a view to profit, such as:
 - A performance of a play (above 500 people, or between 23:00 hours and 08:00 hours);
 - An exhibition of a film (above 500 people, or between 23:00 hours and 08:00 hours);
 - An indoor sporting event (above 1000 people, or between 23:00 hours and 08:00 hours);
 - Boxing or wrestling entertainment;
 - A contest, exhibition or display which combines boxing or wrestling with one or more martial arts ("combined fighting sports");
 - A performance of live music (above 500 people, or between 23:00 hours and 08:00 hours);
 - Any playing of recorded music (above 500 people, or between 23:00 hours and 08:00 hours);
 - A performance of dance¹ (above 500 people, or between 23:00 hours and 08:00 hours);
 - Entertainment of a similar description to a performance of live music, any playing of recorded music or a performance of dance (above 500 people, or between 23:00 hours and 08:00 hours); or

¹Inclusive of "relevant entertainment" as defined under Sch. 8 of the Local Government (Miscellaneous Provisions) Act 1982.

- The supply of hot food or drink from any premises between 23:00 hours and 05:00 hours.
- 2.3 These licensable activities are covered through application to the Royal Borough of Greenwich for a licence to undertake them. These include applications for new premises licences; club premises certificates; variations to these types of permission; temporary events; and reviews of licences and /or certificates.
- 2.4 The Royal Borough's intention is that local people, their families and visitors are provided with opportunities for enjoyable, pleasurable and safe experiences. It is paramount that these experiences are safe, without fear of violence, intimidation or disorder whilst on, arriving at or leaving licensed premises. The Policy highlights that local residents should not be unreasonably disturbed, whether in the street or at home, by activities or customers within, or linked to, licensed premises.
- 2.5 The Policy aims to provide a necessary balance between providing a platform upon which responsible business operators may contribute towards a thriving business and late-night economy, especially in those areas undergoing substantial regeneration, whilst at the same time ensuring that the quality of life of those who live and work in Royal Greenwich is protected and enhanced through the licensing system. These objectives are achievable if all parties concerned work together.
- 2.6 The Royal Borough of Greenwich Statement of Licensing Policy is paramount in the administration and enforcement of the Licensing Act 2003, in a time of Central Government austerity measures and diminishing Police resources. The Royal Borough note that the current statutory licensing fees do not cover the cost of the administration of the licensing regime in aiming to promote the licensing objectives. The Royal Borough supports the concept of locally-set fee levels so that the local authority no longer subsidises the licensed trade in this regard.
- 2.7 The Royal Borough of Greenwich Statement of Licensing Policy aims:
- To inform licence applicants of the parameters under which the Licensing Authority will make licence decisions and ensure applicants are clear about the ways licensed premises are expected to operate within an area.
 - To reinforce to elected Members of the Licensing Committee, Sub-Committees, and officers with delegated authority, the boundaries and power of the Licensing Authority when making licence decisions.
 - To support Police and the Licensing Authority in their efforts to manage and act against those premises that are causing problems, as well as supporting businesses to be responsible premises.
 - To encourage businesses to adopt practices that reflect the needs of the local community.
- 2.8 This Policy will remain valid for a period of up to five years from the date of issue, but may be subject to review at any time following appropriate consultation.
- 2.9 The Royal Borough undertakes regular data-driven reviews of the Cumulative Impact Zones (CIZs) to ensure their continued relevance. This process allows for zones to be

added, modified, or removed as necessary based on the evidence. Following the latest data refresh and review for this policy in 2025, the zones were determined to remain fit for purpose. A detailed analysis of the zones and the underlying data is provided in **Appendix I**.

3 Submission & Consultation on Licensing Applications

- 3.1 It is the responsibility of the applicant to ensure that they have permission to use the land or premises for which they are applying for a licence. Applicants who propose to hold licenced events on land operated by the Royal Borough should first seek permission / approval from the Royal Borough's Events team. Visit www.royalgreenwich.gov.uk/info/200226/parks_and_open_spaces or email events@royalgreenwich.gov.uk .
- 3.2 The Royal Borough's licensing team are available to offer pre-application advice both in written form, and in person where appropriate. Visit www.royalgreenwich.gov.uk/licensing .
- 3.3 An application for a premises licence may be made in writing or electronically, using the relevant licensing application form available on GOV.UK or the Royal Borough's own electronic facility (where available).
- 3.4 In the case of written applications, the applicant is required to send a copy of their application to the appropriate Responsible Authorities as defined within the Act. In the case of applications that are submitted entirely in an electronic form, the Royal Borough shall copy the application to the Responsible Authorities instead.
- 3.5 The date of submission will be deemed to be the day when a complete and valid application has been submitted to the Royal Borough, together with the correct application fee. The appropriate last date for representations will be calculated accordingly. However, this date may be extended if the applicant does not comply with any statutory requirements to advertise their application.
- 3.6 In addition to the statutory consultation requirements of the applicant, the Royal Borough may also carry out its own consultation by publishing online key information regarding applications and notifying interested parties that operate in the local area, such as residents' associations and groups.
- 3.7 It is open to any Responsible Authority or any "other person" as defined under the Act, which includes Councillors, to lodge representations during the set consultation period. There is no facility for the Royal Borough to accept late representations received outside of the consultation period.
- 3.8 A representation should relate to the likely effect of the grant or variation of the licence application on grounds relating to the promotion of at least one of the licensing objectives. A representation that fails to do so is not "relevant" for the purposes of the 2003 Act and will be rejected.

- 3.9 It is the Royal Borough's policy to determine on its merits whether any representations by other persons are frivolous or vexatious.
- 3.10 All representations must be received in writing at the Licensing Section's Office. This can be either by post, email or via our online register at <https://regulations.royalgreenwich.gov.uk>. Representations received by post must be signed. Representations received by any means must be dated, provide the grounds of the representation in full, and include the name and address of the person or body making the representation.
- 3.11 All representations are sent to the applicant in full, to enable them to respond. The name of those making representation, and whether they are in support or opposed to the application, is published within committee papers that are available through the Royal Borough's website as a matter of public record.
- 3.12 Representations cannot be accepted if they have been made anonymously, and all representations submitted to the Royal Borough shall only be accepted where they contain the full name and address of the person making it. However, in exceptional cases those making representation can request that the Royal Borough redact certain personal details from the applicant and/or in public documents, and explain why their details need to be withheld. All requests will carefully be considered, but anonymity cannot be guaranteed. If we are unable to agree to the request, the person making the representation will have the opportunity to withdraw their representation. Those making representation should note that because redacted representations may unduly affect the applicant's ability to respond to any issues raised therein, such representations may be treated with less weight than those where the identity of the persons submitting them is known.
- 3.13 Petitions will be considered as a relevant representation provided that all the signatories include their name, address, and signature. Every page of a petition must be clearly headed detailing on what grounds the representation is made. Details of the "lead petitioner" should be provided when the petition is submitted. Digital / online petitions will be permitted; however, a link to the petition will not, in and of itself, be accepted as a representation. Instead, the lead petitioner must ensure that a copy of the petition (whether in a printed or electronic file format such as a .pdf) is submitted to the Royal Borough prior to the end of consultation. Digital / online petitions may substitute a valid email address in place of a signature.
- 3.14 Ward Councillors and MPs may make relevant representation in their own right, and subsequently attend and speak at a hearing of the Licensing Committee or Licensing Sub-Committee. Ward Councillors and MPs may also attend and speak at a hearing, if requested to do so, on behalf of any other person who has made relevant representation, provided written authorisation is given.
- 3.15 The Royal Borough, in its role as a Licensing Authority, will determine when it considers it appropriate to act in its capacity as a Responsible Authority. This may be in cases where early intervention is required, for example making a representation to the grant of a new application in a CIZ as it may add to cumulative impact of the licenced premises

in that area. The Royal Borough as a Licensing Authority, in its role as a Responsible Authority, is not required to make representations on behalf of other persons, but may do so in appropriate circumstances.

- 3.16 In cases where the Royal Borough, as a Licensing Authority, is also acting as a Responsible Authority in relation to the same process, a separation of responsibilities and process will be implemented within the authority to ensure procedural fairness and to eliminate any conflicts of interest. Separation will be achieved by allocating distinct functions to different officers within the authority. The officer advising the Licensing Committee shall be separate from the officer acting as the Responsible Authority and there shall be no discussion between those officers regarding the merits of the case.
- 3.17 Issues relating to the licensing objectives can take place in relation to licenced premises despite the best efforts of the licensee, as they may occur outside the licensee's sphere of influence and legal control. However, the duty to promote the licensing objectives requires the Royal Borough to take account of representations that raise such activity in relation to a particular area when making decisions on applications.

4 Determination of Licence Applications

- 4.1 Applications that do not receive relevant representations shall be granted automatically. Applications that do receive relevant representations shall be considered by the Royal Borough under the terms of this policy on their own merits and with due regard to the Guidance issued under Section 182 of the Licensing Act 2003, the Licensing Act 2003 itself, and any supporting regulations.
- 4.2 This policy does not override the right of any person to make relevant representations on an application or seek a review of a licence or certificate where provision has been made for them to do so in the Act. A representation will usually only be relevant where it relates to one or more of the licensing objectives, specifically:
- the prevention of crime and disorder;
 - public safety;
 - the prevention of public nuisance; or
 - the protection of children from harm.
- 4.3 The Royal Borough expects that all staff involved in the sale of alcohol will receive training. Higher standards are expected of Designated Premises Supervisors (DPS) because they have a higher level of knowledge as holders of a personal licence qualification. Therefore, the competency and conduct of personal licence holders and the DPS will be considered much more robustly as having a material role on a venue's impact when considering new applications, reviews or applications for variation.

5 The Licensing Process

- 5.1 Powers of the Royal Borough under the Act may be carried out by the Licensing Committee, by a Sub-Committee, or by one or more officers acting under delegated authority.

- 5.2 It is considered that many of the functions will be administrative in nature and, in the interests of speed, efficiency, and cost effectiveness, these will be carried out by officers. Such delegated decisions will be listed for information at a Licensing Committee meeting upon request.
- 5.3 The Licensing Sub-Committee/s will deal with applications where there are relevant representations or objections (that have not been withdrawn), as well as any applications for the review of a licence prompted by representations from any of the relevant bodies.
- 5.4 When determining applications, the Royal Borough will have regard to any Guidance issued by the Home Office. In particular, account will be taken of the need to encourage and promote live music, dancing and theatre for the wider cultural benefit of the community as a whole. If representations are made concerning the potential for limited disturbance in a particular neighbourhood, the Royal Borough's consideration will balance the representations against the potential wider benefits to the community.
- 5.5 When attaching conditions to licences, the Royal Borough will also be aware of the need to avoid measures that might deter live music, dancing or theatre by imposing indirect costs of a substantial nature. The Royal Borough will monitor the impact of licensing on regulated entertainment, particularly live music and dancing. If there is evidence that licensing requirements deter such activities in Royal Greenwich, it will consider how to mitigate the adverse effects and if necessary will review the Licensing Policy.
- 5.6 The Royal Borough encourages the licensing of public spaces for cultural and community events. By licensing the public space, event organisers do not need to obtain a licence themselves for individual events. The views of other persons and responsible authorities will be considered in ensuring the premises licence fully meets the requirements of the licensing objectives.
- 5.7 The Director of Housing & Safer Communities has delegated authority, in consultation with the Chief Executive and Leader, to determine whether licensing matters should be considered by the Licensing Committee. Except where it is decided that a matter should be determined by the full Licensing Committee, the Royal Borough accepts the Secretary of State's recommendations that delegation by the Licensing Committee will be approached in the following way:

Matter to be dealt with:	Sub-Committee	Officers
Application for personal licence.	If a Police objection made.	If no objection made.
Application for personal licence with unspent convictions.	All cases.	
Application for premises licence/club premises certificate.	If a relevant representation made.	If no relevant representation made.
Application for provisional statement.	If a relevant representation made.	If no relevant representation made.

Matter to be dealt with:	Sub-Committee	Officers
Revocation or suspension of personal licence by local authority where it becomes aware of convictions or immigration penalties.	All cases.	
Application to vary premises licence/club premises certificate.	If a relevant representation made.	If no relevant representation made.
Application to vary designated premises supervisor.	If a Police objection.	All other cases.
Request to be removed as designated premises supervisor.		All cases.
Application for transfer of premises licence.	If a Police objection.	All other cases.
Applications for interim authorities.	If a Police objection.	All other cases.
Application to review premises licence/club premises certificate.	All cases.	
Withdrawal of club premises certificate under Section 90.	All cases.	
Decision on whether a complaint is irrelevant, frivolous, vexatious, etc.		All cases.
Decision to object when local authority is a consultee and not the relevant authority considering the application.	All cases.	
Determination of Police or environmental health objection to a standard temporary event notice.	Where no agreement is reached and objection stands.	Where agreement is reached and objection is withdrawn.
Determination of Police or environmental health objection to a late temporary event notice.		All cases.
Determination of application to vary premises licence at community premises to include alternative licence condition.	If a Police objection.	All other cases.
Decision whether to consult other responsible authorities on minor variation application.		All cases.
Determination of minor variation application.		All cases.

Matter to be dealt with:	Sub-Committee	Officers
Classification of Films.		All cases.
Re-classification of Films.		All cases.

- 5.8 In exceptional circumstances, whereby it is not possible or practical to hold a Licensing Sub-Committee hearing in person, to avoid having to defer hearings to a later date, the Royal Borough may opt to hold such hearings via remote means, for example via video conferencing. Such meetings will also be simultaneously broadcast via the Royal Borough's website or other social media platforms.

6 Licence Conditions

- 6.1 The Royal Borough maintains that licensing is about the control of licensed premises, qualifying clubs and temporary events within the terms of the Act. Any conditions attached to licences will be focused on matters that are within the control of individual licensees and must be appropriate for the promotion of the licensing objectives.
- 6.2 These conditions will relate to the premises and other places being used for licensable activities, and the impact of those activities in the near vicinity of the premises. In this regard, the Royal Borough will primarily focus on the impact, or reasonably anticipated impact, of any activities taking place at the licensed premises on those living, working or engaged in normal activity in the area concerned.
- 6.3 Where the Royal Borough's discretion is engaged as a result of relevant representations, tailored and proportionate conditions may be imposed on a licence to address the individual licensing objectives.
- 6.4 In applying conditions, the Licensing Authority will have regard to the scale, style, and risk profile of the premises. Conditions will be applied only where appropriate and proportionate to the individual case, in accordance with the licensing objectives. The model conditions in the Appendices are illustrative and will not be applied as standard.
- 6.5 In assessing the methods to be used by licence applicants to meet the licensing objectives and in consideration of representations made, regard will be taken of relevant industry standards, appropriate guidance, and local policies. These will inform the conditions which will be applied to the licence.
- 6.6 In order to avoid duplication with other statutory regimes as far as possible, the Royal Borough will not attach conditions on a licence unless they are considered appropriate for the promotion of the licensing objectives. A list of non-exhaustive conditions for consideration appear in Appendices A to G. Whilst these are not standard conditions, they demonstrate good practice and may be used in preference to poorly worded conditions offered in the operating schedules of submitted applications.
- 6.7 To provide clarity for applicants and the public, it is important to emphasise that licensing conditions will only be imposed where they are appropriate, necessary, and proportionate to promote the licensing objectives. The Council will not seek to duplicate existing statutory obligations placed on other regulatory agencies. The

Metropolitan Police Service, as a Responsible Authority under the Licensing Act 2003, plays a key role in advising on risks and shaping conditions, particularly in relation to the prevention of crime and disorder. Similarly, the Council's Environmental Health team provides advice on matters concerning public safety and the prevention of public nuisance. However, any Responsible Authority may make representations and propose conditions relating to any of the licensing objectives, provided there is a clear and evidenced need for such conditions, and that they are demonstrably appropriate, necessary, and proportionate in the context of the application.

7 The Licensing Objectives

7.1 The Royal Borough recognises the great variety of premises for which licences may be sought. These will include theatres, cinemas, restaurants, pubs, nightclubs, cafes, takeaways, shops, community halls and schools. The Royal Borough has a duty under the Act to carry out its functions with a view to promoting the licensing objectives. The licensing objectives are:

- the prevention of crime and disorder;
- public safety;
- the prevention of public nuisance; and
- the protection of children from harm.

Each objective has equal importance.

7.2 It is recognised that the licensing function is only one means of securing delivery of the above objectives and should not be seen as a means for solving all problems within the community. The Royal Borough will therefore continue to work in partnership with its neighbouring authorities, the Police, local businesses and local people towards the promotion of the objectives.

7.3 Applicants are required by the Act to submit an operating schedule as part of the application process. The Royal Borough will expect applicants to address the licensing objectives in their operating schedule having regard to the type of premises, the licensable activities proposed, the location of the premises, and the potential impact of the premises operation on the local community.

7.4 Applicants will be encouraged to make themselves aware of any relevant planning and transportation policies, tourism and cultural strategies, or local crime prevention strategies, and to have taken these into account, where appropriate, when formulating their operating schedule.

7.5 Where the Royal Borough receives information that illegal activities may be taking place in any premises, it will pass on this information to the Police or other enforcement agencies.

A. The Prevention of Crime and Disorder

7.6 The Royal Borough recognises that well-run premises can make a valuable, positive contribution to the local community through the local economy, tourism and cultural

development. However, because of the link between alcohol consumption and crime and disorder, especially those offering late night entertainment / refreshment for large numbers of people, premises that are not properly managed and controlled can become a serious source of anti-social behaviour, such as violence, sexual assault, domestic abuse, public disorder, noise, and street drinking.

- 7.7 In addition to the requirement to promote the licensing objectives, the Royal Borough recognises its duty under Section 17 of the Crime and Disorder Act 1998 and, as such, will work with its own Community Safety & Integrated Enforcement Team, the Police and responsible authorities to deter and prevent crime and disorder within the Royal Borough.
- 7.8 The Royal Borough will expect applicants to address in their operating schedule how the operation of the premises will satisfactorily address crime and disorder issues ranging from the design of the premises through to the daily operation of the business, whilst promoting the prevention of crime and disorder objective. For pubs, bars and premises with facilities for music and dancing (e.g. nightclubs), a specific assessment may be needed of how the risks of violence and crime in the premises and the vicinity will be managed.
- 7.9 In decisions relating to applications in respect of general-purpose grocery stores, the Royal Borough may impose a limit on the shelf-space available for the display of alcohol.
- 7.10 The Royal Borough will require the licence holder to indicate what steps will be put in place to control the excessive consumption of alcohol and drunkenness on the relevant premises, to reduce the risk of anti-social behaviour occurring elsewhere after customers have left the premises.
- 7.11 The Police and the Royal Borough's Community Safety & Integrated Enforcement Team are the main source of advice on crime and disorder. Applicants are recommended to seek advice on crime prevention from Greenwich Police before making a formal application. The Licensing Police can be contacted at SEMailbox.licensing@greenwich@met.police.uk.
- 7.12 The steps offered in operating schedules to promote the licensing objectives may include, for example, measures relating to management systems, training, drugs policies, search procedures, entry policies, physical security, door supervisors, bottle bans, drinks containers, smoking area capacity limits, CCTV, restricting drinking areas, premises capacity limits, dispersal policies, age verification systems such as Challenge 25, procedures to prevent violence against women and vulnerable persons (VAWG) such as the 'Ask Angela', anti-spiking and Welfare and Vulnerability Engagement (WAVE) schemes, crime prevention notices, counter terrorism procedures and signage.
- 7.13 The Royal Borough expects applicants and licensees to have given due consideration to any specific security advice provided to it by Counter Terrorism Security Advisors (CTSA's) or other parties acting on behalf of the Police or other Government Agencies or responsible authority. Licensed premises must carry out suitable and sufficient terrorism threat risk assessments and keep them under regular review.

- 7.14 Advice and support is available to applicants and licensees via the National Counter Terrorism Security Office website at nactso.gov.uk. The NCTSO Venues and Public Spaces (VaPS) Guidance and the suite of Action Counters Terrorism (ACT) products (ACT strategic, ACT Operational, Act Awareness, ACT E-learning and ACT phone application) are available via the Protect UK website [ProtectUK | Home](http://ProtectUK.org) website and are designed to help reduce vulnerability, improve preparedness, and resilience, and Security Culture. The Venues and Public Spaces guidance can be found at [Venues and Public Spaces \(VaPS\) guidance | ProtectUK](http://ProtectUK.org).
- 7.15 The Royal Borough supports local Pubwatch schemes and similar initiatives such as “Business Watch”. Such schemes are demonstrations of good practice by the licensed trade. Licence holders are encouraged to participate in local groups to help promote the licensing objectives. Where appropriate, the Royal Borough will offer advice and assistance to such initiatives and where invited to participate will endeavour to do so.
- 7.16 Applicants and licence holders are expected to be aware of the potential for drug misuse on their premises and, where this is a risk, to take appropriate advice from the Police and/or Public Health Drugs and Alcohol Commissioner, in order to introduce measures that can mitigate this risk. Free online resources are also available from the *Safer Nightlife* website – www.safernightlife.info – which includes advice, guidance and training literature, along with sample logbooks and information on developing a strong drugs policy.
- 7.17 In the case of licence applications for the sale of alcohol, the Royal Borough may limit the alcoholic strength of beers, lagers and ciders for sale to under 6.5% ABV, excluding the sale of agreed premium alcoholic beverages.
- 7.18 The prevention of crime includes the prevention of immigration crime, including illegal working in licensed premises. The Royal Borough will work with Home Office Immigration Enforcement, as well as the Police, in respect of these matters. Where appropriate, the Royal Borough will consider imposing conditions directed at ensuring the prevention of illegal working in licensed premises, such as licence holders being required to undertake right to work checks on all staff and the retention on the premises of a copy of any document checked as part of a right to work check to be produced on inspection.
- 7.19 The Royal Borough recommend premises put in place measures to create a safe and secure environment for everyone, including adoption of schemes supporting safeguarding of women, vulnerable customers and the protection of young adults in licensed venues, thus reducing violence, intimidation and harassment of any nature for staff and customers. Resources on this subject can be found through the Safer Sounds Partnership, which works in partnership with the Metropolitan Police, local authorities, the Mayor’s Office for Policing and Crime (MOPAC) and the Greater London Authority (GLA) to promote consistency of operations, sharing of best practice, bespoke training, and facilitating information sharing, whilst supporting venues, promoters and artists to create safer events for all. The Partnership has created an Event Operations Plan, in partnership with the Police and venues, to:

- Assist licence holders in effective management of events in their premises;
- Enable licence holders to identify risk and mitigate that risk in relation to events in their premises;
- Help licence holders in promoting the licensing objectives;
- Enable licence holders to use best practice to run a safer event(s).

7.20 The Royal Borough expects applicants to include safeguarding measures in their operating policies to help prevent and reduce violent crime linked to the nighttime economy, to prevent and reduce sexual offences, reduce preventable injury linked to alcohol and drug use and reduce opportunities for criminal activity and anti-social behaviour in licensed premises, by

- Promoting 'Ask Angela'.
- Signing up to the Women's Safety Charter: https://www.royalgreenwich.gov.uk/info/200202/community_safety/2023/sign_up_for_the_womens_safety_charter.
- Signing up to a 'Good night out'.
- Signing up to be a "Safe Haven".
- Displaying posters which discourage harassment and hate crime and encourage reporting to staff/managers.
- Taking every report seriously with appropriate action.
- Taking steps to support people who report sexual harassment and assault.
- Training and supporting staff to implement venue policies. Ensure vulnerable customers leave the venue safely, such as Welfare and Vulnerability Engagement (WAVE) Training.
- Use ID scanners at venues
- Conduct risk assessment for each externally promoted event. Consideration to be given to linking in with Safer Sounds through the 'Safer Business Network'. <https://www.saferounds.org.uk>
- Adopt a Standard Operating Procedure (SOP) for every medical emergency that requires an ambulance to be called to the venue.

7.21 The Royal Borough of Greenwich will consider placing conditions on licences to safeguard patrons against spiking, if deemed appropriate and proportionate for a specific venue where there is evidence to justify such action.

7.22 The objective of the prevention of crime and disorder under the Licensing Act 2003 includes taking measures to prevent incidents of spiking which would usually be prosecuted under section 23 and 24 of the Offences Against the Person Act 1861, and section 61 of the Sexual Offences Act 2003. The following examples are within the range of behaviours that would be considered spiking. This list is not exhaustive:

- Putting alcohol into someone's drink without their knowledge or permission.
- Putting prescription or illegal drugs into someone's alcoholic or non-alcoholic drink without their knowledge or permission.
- Injecting another person with prescription or illegal drugs without their knowledge or permission.
- Putting prescription or illegal drugs into another person's food without their knowledge or permission.

- Putting prescription or illegal drugs into another person's cigarette or vape without their knowledge or permission.

7.23 Those premises that may require SIA (Security Industry Authority) door supervisors should give consideration to employing them through an operator that is part of the SIA's Approved Contractor Scheme (ACS). The objectives of the ACS is to raise industry performance standards and ensure its members are the best providers of private security services in the UK.

7.24 Premises licences will undergo review, where the premises in question is suspected or proven to be the source of crime and disorder. Conditions which should be considered to ensure prevention of crime and disorder have been listed in **Appendix A**.

B. Public Safety (including Counter Terrorism)

7.25 The Royal Borough expects all holders of premises licences and club premises certificates to implement measures ensuring the safety of all persons using their premises. Physical safety measures may include, but are not necessarily limited to, the prevention of accidents and injuries and other immediate types of harm, such as loss of consciousness or alcohol poisoning.

7.26 The safety of persons using the premises relates not only to safety in respect of the physical state of the premises, which includes the curtilage and means of access and egress, but also safety in respect of activities taking place within them, such as the use of pyrotechnics or other special effects.

7.27 Public safety may also extend to matters outside the confines of the premises to include public safety in the vicinity of the premises. This may include other areas, such as pavements, persons queuing to gain access, or, in the case of a convenience store at a petrol station, activities such as persons drinking on the garage forecourt.

7.28 The Royal Borough expects applicants in their operating schedules for premises licences and club premises certificates to consider measures ensuring the safety of the public, not only when they are present within the premises, but also their safety within the environs of the premises on arrival and departure. To promote the public safety licensing objective, these measures will be converted into enforceable conditions.

7.29 The Royal Borough recognises that the measures for individual premises will depend on a range of factors, including the nature and style of the venue, the types of activities being conducted, the location of the premises, the anticipated clientele, and the competency of management. Measures to be considered may include (this list is not exhaustive):

- Ensuring fire safety within the premises;
- Maintaining and making available a record of inspection; prior to the opening of the premises to the public and during its operation; of fire doors, escapes, and appliances and of the total number of people on the premises;

- Checks on fire prevention, detection and fire-fighting equipment at specified intervals;
- Standards to be maintained e.g. temporary electrical installations to comply with British Standards;
- Implementing appropriate maximum capacity limits, appropriate to the activities taking place and reliable ways of counting the number of people at the premises;
- Ensuring that floors are kept free from any contamination, such as water, to prevent them becoming slippery from spillages or condensation;
- Preventing members of the public climbing onto ledges, balconies and speakers;
- Keeping sound levels below levels where damage to the hearing of staff and customers is likely to occur;
- Provision of “chill out” rooms to prevent customers becoming distressed;
- Provision of facilities for people who are taken ill or injured to contact friends or to be kept safe while awaiting medical assistance;
- Provision of appropriate access for emergency services, such as ambulance vehicles;
- Effective communication with local authorities and emergency services, for example communications networks with the Metropolitan Police and signing up for local incident alerts;
- Having a robust medical plan with sufficient number of adequately trained first aiders at the premises and appropriate number of first aid kits;
- Ensuring the safety of people when leaving the premises, for example through the provision of information on late-night transportation;
- Provision of sufficient external lighting to enable the public to exit the premises safely;
- Considering the safety of staff when leaving the premises late at night, potentially including measures such as ensuring adequate external lighting around staff exits, reviewing safe exit routes, or providing information on or facilitating safe transport options, recognising the importance of staff welfare and safety;
- Arranging regular and timely waste disposal and recycling, particularly that of glass bottles;
- Using CCTV inside the premises and within the immediate vicinity of it;
- Having policies and procedures that improve the premises’ preparedness for and resilience to a terrorist attack. These policies and procedures must be developed in line with NaCTSO VaPS Guidance and appropriate guidance within the suite of ACT products;
- Responses to terrorist incidents at the premises should be developed and practised. The purpose of this is to assess the overall preparedness to such an incident and the effectiveness of current policies and procedures. As well-rehearsed plans can reduce the overall impact of attacks;
- Counter Terrorism policies and procedures must be tested and reviewed at least every 12 months or more frequently if there are any substantial changes or due to any other need arising.

7.30 The Royal Borough recognises that conditions relating to public safety need to be relevant and proportionate to the circumstances of any individual premises or club premises. The conditions should not duplicate any other legal requirements. The attachment of conditions to the premises licences or club premises certificates will not

in any way relieve the employers of their statutory duties to comply with the requirements of other legislation, such as the Health & Safety at Work Etc. Act 1974, associated regulations, and especially the requirements under the Management of Health & Safety at Work Regulations 1999 and the Regulatory Reform (Fire Safety) Order 2005, to undertake risk assessments.

- 7.31 The Royal Borough may impose a 'safe capacity' limit on relevant premises, where necessary, for the promotion of public safety or the prevention of disorder. This is because in overcrowded venues the risks of crowds becoming frustrated and hostile can increase and therefore compromise public safety. This would only occur in cases where no safe capacity had been imposed through other legislation and where a Responsible Authority may consider it necessary to set a new capacity limit. In these circumstances, where relevant representations are made by Responsible Authorities, conditions, which would apply at any material time when the licensable activities are taking place, may be attached to premises licences and club premises certificates.
- 7.32 Terror attacks, although not common, have historically occurred within the Royal Borough of Greenwich. All premises are expected to have regard to the National Counter Terrorism Security Office (NaCTSO) VaPS Guidance and suite of Action Counters Terrorism (ACT) products that are available via the Protect UK website [ProtectUK | Home](#). The prevention of terrorism is an essential element of the public safety and crime and disorder licensing objectives.
- 7.33 The Royal Borough expects applicants and licensees to have given due consideration to any specific protective security advice provided by Counter Terrorism Security Advisors or other parties acting on behalf of the police, government agencies, or other responsible authorities. Licensed premises must carry out suitable and sufficient terrorism threat risk assessments and keep them under regular review.
- 7.34 The Royal Borough is committed to ensuring that residents and visitors can access licensed venues and enjoy services and facilities safely and without fear of intimidation, harassment, or threatening behaviour driven by hatred, prejudice, or intolerance. Upholding this commitment requires more than just physical security. Applicants and licensees should be vigilant against the potential for their premises to be inadvertently used by individuals or groups whose presence or activities could undermine this safety by promoting hatred, discrimination, or disorder linked to extremism (including, but not limited to, those associated with the far-right). As publicly accessible venues and potential event spaces, premises should have measures in place to ensure their facilities are not exploited by individuals seeking to facilitate the spread of extremist narratives which can reasonably be linked to terrorism. This helps to limit access to platforms that could be used to radicalise others. Premises are expected to have in place appropriate operational policies, staff training, and procedures to identify and address such risks. This includes maintaining a zero-tolerance approach to racism and other forms of discrimination on the premises, and knowing to report any significant concerns about potential extremist activity to the police or other relevant responsible authorities.
- 7.35 As part of their vigilance and safeguarding responsibilities, licensees and staff should know how and to whom to report any significant concerns related to potential

extremist activity, radicalisation risks, or other counter-terrorism matters. Concerns can be reported to:

- Royal Greenwich Prevent Team: Prevent@royalgreenwich.gov.uk;
- Royal Greenwich Community Safety Team: CommunitySafety@royalgreenwich.gov.uk;
- Action Counters Terrorism hotline, online at <https://act.campaign.gov.uk/> or by phone to 0800 789 321;
- In an emergency, always call 999.

- 7.36 The Royal Borough will give due consideration to appropriate counter-terrorism measures and advice when considering licence applications. Examples of these may include high profile events or large premises or events where there are factors that may potentially increase the risk of attacks, particularly when in receipt of relevant advice from Police counter terrorism staff.
- 7.37 The Royal Borough will consider conditions around health care provision in this regard. Any additional licensing conditions will be appropriate and proportionate to the venue. The Royal Borough will pay particular attention to terrorist threats when making specific licence conditions in relation to security or health care provision at appropriate premises and events applying for a licence.
- 7.38 The Royal Borough, as well as conditions outlined above, depending on the particular nature of the application, may go further when addressing concerns around possible terrorist or other such risks and applicants should seek professional advice if in doubt.
- 7.39 For guidance on conditions that the Royal Borough will expect an applicant to demonstrate in their operating schedule, specifically that suitable and sufficient steps have been taken to ensure licensing objective of public safety (**Appendix B**) provides further conditions that should be considered.

C. The Prevention of Public Nuisance

- 7.40 The Royal Borough will require any applicant to demonstrate within their operating schedule how they intend to prevent public nuisance arising and, equally, to prevent nuisance to ensure that the prevention of public nuisance licensing objective in particular, and the licensing objectives in general, are met. Public nuisance includes noise caused by customers arriving at and/or leaving a premises, noise created whilst they are within a premises, general anti-social behaviour, and issues such as smoke, odour, litter, light, fly-posting, and obstruction of the highway. These examples are not exhaustive and applicants should demonstrate within their application how all potential public nuisance issues relevant to their premises will be mitigated. Conditions which should be considered, to ensure the prevention of public nuisance, are listed in **Appendix C**.
- 7.41 Noise nuisance can arise from a range of sources such as entertainment noise escaping from premises, loud voices from customers standing outside, the disposal of waste in refuse or recycling bins, car doors slamming, taxi horns sounding as patrons are picked up, and the general noise of people arriving and leaving. This is particularly intrusive at night when background noise levels are lower and residents are trying to sleep, and so

it is important that applicants can demonstrate how they will effectively manage the exit and dispersal of their customers. Consideration should be given to the following:

- Installing acoustic lobbies to all entrances/exits;
- Installing speakers on acoustic mounts;
- The use of appropriate noise limiters on amplification equipment used at the premises, to ensure that noise or vibration does not emanate from the premises so as to cause a nuisance to nearby residential properties;
- Keeping all doors (except for access/egress) and windows at the premises closed whilst entertainment is taking place;
- Prominently displaying clear and legible notices at all exits requesting the public to respect the needs of local residents and to leave the premises and the area quietly;
- That the placing of refuse and recycling into receptacles outside the premises should only take place between 08:00 hours and 23:00 hours to minimise the disturbance to nearby residential properties;
- Limiting the number of customers smoking or vaping outside the premises at any one time.

7.42 The Council recognises that noise complaints may be under-reported, and therefore considers both formal and informal sources of intelligence when assessing applications or responding to complaints. Environmental Health, Community Safety and Licensing teams will work collaboratively to share data, identify patterns of concern, and ensure a coordinated approach to prevention and enforcement.

7.42 Procedures must be put in place to manage the behaviour of customers insofar as preventing it from becoming a public nuisance. These measures may include management of patrons when they arrive and leave the premises; the placing of signage reminding patrons to arrive and leave quietly, and to have respect for local residents; arranging a dedicated taxi service to assist the quick dispersal of customers away from the premises; and when drinking outside is permitted (such as in a beer garden or on a forecourt), the implementation of workable procedures to reduce/remove the potential of disturbance to neighbours. Again, these examples are not exhaustive.

7.43 Licence applicants for premises that are contained within residential blocks need to ensure that their application addresses how the licence, if granted, would not negatively impact on the residents within the block.

7.44 Premises that provide food and/or drink for consumption off the premises could create public nuisance in the form of customers causing litter (i.e. food wrappings and drink containers) in the vicinity of the premises and the wider area. Applicants for licences allowing the provision of late night refreshment, together with the sale of alcohol for consumption off the premises, are recommended to consider the problems that litter causes through their operation and what steps they will take to prevent such nuisance. The steps they could take (and include in the operating schedule section of their application form) include, but are not limited to:

- The provision of waste receptacles directly outside the premises;
- Notices on display asking customers to dispose of their litter and refuse responsibly; and,

- The licence holder arranging for the clearing of litter in the immediate vicinity of their premises at regular intervals during licenced hours or, at a minimum, at the close of business each day.
- 7.45 The trading hours during which licensable activities are permitted at premises by the conditions of a premises licence or a club premises certificate, are set for the prevention of public nuisance. Where premises are in a predominately residential area, the potential for public nuisance is greater. Restrictions may be necessary on the times when certain licensable activities take place, even though the premises may be open to the public at such times. For example, the playing of recorded music after 23:00 hours might be prohibited, even though other licensable activities are permitted to continue. Applicants should consider factoring a suitable “drinking up” time for alcohol and “winding down” time for regulated entertainment into their operating hours. Where an external area is permitted to have licenced activity, for example a beer garden or open forecourt, it may be appropriate to cease that activity earlier than the terminal hour for the rest of the premises.
- 7.46 In certain premises where existing legislation does not provide adequately for the prevention of public nuisance, consideration should be given to conditions that ensure the flashing of particularly bright lights on, or outside, licenced premises do not cause a nuisance to nearby properties (light pollution). Such conditions may include restrictions on the number, luminosity, and/or alignment of lights.
- 7.47 The Royal Borough expects applicants to outline in the operating schedule of their licence application measures so as to avoid disturbance to noise-sensitive premises from vehicles arriving, departing and parking for an event, as follows:
- Guidance to patrons on routes to take as they depart, to cause least disturbance to noise-sensitive premises;
 - Guidance to patrons via websites to travel by public transport;
 - Guidance to staff on their responsibilities to minimise noise from patrons as they arrive at and depart from the premises;
 - Arrangements for the calling of taxis, minicabs, cars or limousines from within the premises, and for the collection of patrons by arrangement;
 - Arrangements with dedicated taxi, minicab, car or limousine companies to collect patrons in an agreed manner so as to minimise disturbance;
 - Arrangements for staff and patron parking.
- 7.48 Licence holders are expected to adhere to the prevention of public nuisance through their licensable activities and demonstrate ways in which public nuisances, which result from the premises or its users, will be mitigated against. Conditions which should be considered, to ensure the prevention of public nuisance, have been listed in **Appendix C**.

D. The Protection of Children from Harm

- 7.49 The Royal Borough will not impose any condition which specifically requires access for children to be provided at any premises. Access by children to all types of premises will not be limited in any way, unless it is considered necessary to do so for the prevention

of harm or would compromise another licensing objective. Although the Royal Borough is sympathetic to applications which create additional appropriate child and family friendly venues, the Royal Borough will consider limiting access to children if there is a risk of moral, psychological and/or physical harm posed by their presence. Licence applicants are expected to determine and enforce appropriate times for children to be present on the premises and promote their safety with suitable measures, reflected within operating schedules. Where no restriction or limitation is imposed by the Licensing Authority, the issue of access and suitable measures will remain a matter for the discretion of the individual licensee or club. Each licence application will be judged on an individual basis.

- 7.50 The Royal Borough expects every premises licence holder and/or club premises certificate holder to ensure that a mandatory age verification policy is adopted in respect of premises in relation to the sale or supply of alcohol. The Royal Borough recognises the widespread problem with compliance of the law regarding the sale of alcohol to those under the age of 18. The Royal Borough shares the Government's concern over the consumption of alcohol by children. Trading Standards, Public Health and the Police strongly support the use of 'Challenge 25' in all licenced premises as an aid to preventing underage sales of alcohol. Trading Standards and the Police are also available to give advice around preventing underage sales.
- 7.51 It is intended that a complete ban of children from premises shall be rare. The Royal Borough would expect greater concern be taken by applicants and licence holders, within operating schedules and business policies, for the hours where those under the age of 16 are permitted access to a premises. Where a licenced premises engages in events where the customers will primarily be 16, 17 or 18 years in age, the Royal Borough would encourage licensees to inform the Responsible Authorities in advance so that appropriate, specific and relevant advice can be provided.
- 7.52 In the case of premises that are used for film exhibitions, conditions will be imposed restricting access only to those who meet the required age limit in line with any certificate granted by the British Board of Film Classification or, in specific cases, a certificate given to the film by the Royal Borough. Details of the process for the classification and re-classification of films may be found on the Royal Borough of Greenwich website at: https://www.royalgreenwich.gov.uk/info/200299/alcohol_and_entertainmentlicences/793/film_classification.
- 7.53 Where a large number of children are likely to be present on any licenced premises, for example a children's show, pantomime or any other child-friendly venture, then additional conditions may be imposed, including requiring the presence of an appropriate number of adult staff; adequate and up-to-date professional training around key safeguarding matters for licenced premises; and a record of those holding a relevant and contemporary DBS certificate (or equivalent criminal record check recognised in the UK) to ensure public safety and protection from harm. Anyone intending to provide staff for the supervision of activities of children under 16 shall be required to carry out criminal record checks on all such staff. A register of these checks and any training undertaken shall be kept on the premises and available for inspection by authorised officers of the Royal Borough or Police officers.

- 7.54 A young person of compulsory school-age must have a Child Performance Licence and be accompanied by a parent, chaperone or matron approved by the Royal Borough to perform in licenced premises. Information regarding performance licences and chaperone licences can be found on the Royal Borough of Greenwich website at: https://www.royalgreenwich.gov.uk/info/200296/child_employment_licences/788/apply_for_a_child_performance_licence .
- 7.55 The Royal Borough recognises the national concern with the association of specific premises, hotels and late-night refreshment venues in particular as the source of, and contributing to, the sexual and criminal exploitation of children. As such, it is expected that premises provide relevant training on Child Sexual Exploitation (CSE), Child Criminal Exploitation (CCE), reducing the risk of radicalisation (PREVENT) and other contemporary safeguarding concerns. Premises are expected to offer suitable conditions, training, and support for staff to be vigilant and equipped to observe, record, and pass on any safeguarding concerns to the relevant authorities. This includes concerns related to child sexual exploitation, child criminal exploitation, and concerns regarding potential extremist activity or individuals/groups whose presence or conduct on the premises might indicate a risk of radicalisation or the promotion of extremist ideologies. The Royal Greenwich licensing team and the Police are also available to offer advice around safeguarding issues.
- 7.56 The Royal Borough strongly advises that all licenced premises which permit any person under the age of 18 on to their premises at any time undertake appropriate and regular training around key safeguarding issues relative to their premises type. It is advised that safeguarding, and Prevent training is provided to all staff on a regular basis and is recorded as part of a training record. Royal Greenwich Licensing team, the Child Safeguarding team, the Royal Greenwich Lead Prevent Officers, and the Police are available to offer advice around safeguarding and Prevent training.
- 7.57 The Royal Borough expects all staff within licenced premises to look out for any evidence of the premises being used as a base for child sexual exploitation or child criminal exploitation, and to report any such suspicions to the Police by calling '101', or Royal Greenwich Multi-Agency Safeguarding Hub (MASH) Referral Team on 020 8921 3172, or by email to mash-referrals@royalgreenwich.gov.uk as a matter of urgency and noting details within the premises incident log. If any child or other person appears to be in immediate danger, it is expected that staff report to the Police on 999 and complete a witness statement of the event. More information around reporting child protection concerns can be found on the Royal Greenwich website at: https://www.royalgreenwich.gov.uk/info/200237/family_support_and_safeguarding_children/956/report_your_concerns_about_a_child.
- 7.58 The Children and Social Work Act 2017 places duties on the Police, clinical commissioning groups and the local authority to make arrangements to work together and with other partners locally to safeguard and promote the welfare of children in their area. Partners from key areas for Safeguarding Children in Greenwich are invited to attend the Licensing Partnership Meeting to -share and analyse information from partner

agencies in order to identify trends and emerging issues, and agree co-ordinated actions by partner agencies to tackle these issues and trends.

- 7.59 The Royal Borough expects all staff within licensed premises to take appropriate steps to reduce the risks of radicalisation, be that via due diligence for third party venue hire/ use or any guest speakers. Further information can be found in the Royal Borough of Greenwich Premises Hire and Due Diligence Guidance. Any concerns should be reported to the Police via the Action Counters Terrorism Hotline on 0800 789 321 and the Royal Borough of Greenwich Prevent team on Prevent@royalgreenwich.gov.uk. If there are immediate concerns for safety it is expected that staff report to the Police on 999.
- 7.60 Relevant information relating to licenced premises of concern, and pertinent data regarding those young people who are at risk when accessing those premises, is be shared and reviewed as permitted within the stipulations of the General Data Protection Regulation (GDPR) and Data Protection Act 2018; the Caldicott Principles; Working Together to Safeguard Children (DfE 2018); and Information Sharing: Advice for practitioners providing safeguarding services (DfE 2018). Risk assessments, plans and interventions are aligned across the partnership and are agile in response to rapid changing situations. All work is underpinned by robust and timely information sharing and outcome-focussed plans to reduce risk.
- 7.61 The Royal Borough will expect applicants to demonstrate in their operating schedule that suitable and sufficient steps are to be taken to ensure the licensing objective of the protection of children from harm. In addition to mandatory conditions, **Appendix D** provides further conditions which should be considered.

8 Monitoring the Impact of Alcohol Sales

- 8.1 The Royal Borough is committed to supporting a safe, vibrant and responsible licensed sector that contributes positively to the local economy and community life. We recognise that the majority of licensees operate lawfully and provide well-managed venues where alcohol is consumed safely and responsibly. Our role is to support such businesses while taking a firm and proportionate approach to tackling harm where it arises.
- 8.2 To this end, The Royal Borough works in close partnership with the Metropolitan Police Service, Public Health, and other agencies to monitor the impact of alcohol sales on crime, disorder and anti-social behaviour across the borough. This includes analysing data on alcohol-related incidents, identifying emerging hotspots, and taking proactive steps to mitigate risk, particularly in areas where concerns are raised by residents or stakeholders.
- 8.3 We will continue to:
- Collect and review evidence on the relationship between alcohol consumption and public safety issues, including violence, anti-social behaviour, public nuisance, and alcohol-related health harms;

- Collaborate with Public Health to understand and respond to the broader impact of alcohol-related harm on individuals, families and local health services, including emergency care, long-term illness, and mental health;
- Support joint operations and targeted enforcement activity on high-risk days, such as major events, match days, or seasonal celebrations;
- Use licensing reviews and other enforcement powers where premises are found to be contributing to alcohol-related harms or operating irresponsibly;
- Promote voluntary schemes and best practice among operators, such as staff training, Challenge 25, and engagement in local Pubwatch or Business Improvement District partnerships.

8.4 We will continue to:

- Collect and review evidence on the relationship between alcohol consumption and public safety issues, including violence, anti-social behaviour, public nuisance, and alcohol-related health harms;
- Collaborate with Public Health to understand and respond to the broader impact of alcohol-related harm on individuals, families and local health services, including emergency care, long-term illness, and mental health;
- Support joint operations and targeted enforcement activity on high-risk days, such as major events, match days, or seasonal celebrations;
- Use licensing reviews and other enforcement powers where premises are found to be contributing to alcohol-related harms or operating irresponsibly;
- Promote voluntary schemes and best practice among operators, such as staff training, Challenge 25, and engagement in local Pubwatch or Business Improvement District partnerships.

8.5 While public health is not a specific licensing objective under the Licensing Act 2003, The Royal Borough recognises the significant and growing evidence base around alcohol-related harm and its impact on wider public health and wellbeing. These insights help inform our broader policy approach and our partnership work to reduce harm and promote safer communities.

8.6 Where evidence shows that the cumulative impact of alcohol sales in a particular area is undermining the licensing objectives or contributing to wider harm, the Royal Borough will consider using its powers to review relevant policies or take appropriate licensing action.

8.7 Through a balanced approach of partnership, prevention, and proportionate enforcement, we aim to ensure that alcohol can be enjoyed safely and responsibly across the Royal Borough, without causing harm to individuals or the wider community.

8.8 The Royal Borough will work with external partners and its own services to raise awareness of the harms associated with excessive alcohol consumption and underage drinking among young people. This includes participation in regional campaigns, targeted education and compliance initiatives, and promoting resources that support responsible consumption and age restricted sales of alcohol.

9 Public Health.

- 9.1 Health bodies were made Responsible Authorities under the Licensing Act 2003 in April 2012. Although public health is not a licensing objective, health-related data can be used to plot CIZs and to identify the potential impact of premises on crime and disorder, public safety, public nuisance, and/or the protection of children.
- 9.2 Alcohol is a key risk factor for poor health in Royal Greenwich, particularly in areas of deprivation. Over a fifth of Greenwich residents live in areas ranked the most deprived in England. Evidence demonstrates alcohol has a disproportionate effect on the health and wellbeing of the poorest residents, with those in the most deprived areas of the borough being more than four times as likely to die from alcohol related conditions. This evidence is consistent with international research on alcohol impacts on varying socioeconomic groups, which is known as the Alcohol Harms Paradox¹.
- 9.3 Over consumption of alcohol can lead to dependence and alcohol is a causal factor in more than 60 medical conditions, including: mouth, throat, stomach, liver and breast cancers, high blood pressure, cirrhosis of the liver, and depression. Alcohol is also associated with many socio-economic issues, including emotional and relationship problems, poor mental health, domestic abuse, violent and sexual offences, antisocial behaviour, and loss of productivity (increase in sick days)².
- 9.4 The most recent evidence for the Royal Borough of Greenwich suggests that in 2023-24, 3,200 adults are dependent drinkers³ and national evidence suggests there is approximately 14 alcohol dependent adults for every 1,000 adults in England⁴.
- 9.5 The NHS Health Survey data shows that drinking is highest among people in late-middle age, with those aged 55-64 most likely to regularly exceed their weekly unit intake; the majority of these are men⁵.
- 9.6 Evidence from the Royal Borough of Greenwich Public Health Roadshow in 2019 demonstrated Eltham has the highest ratio of at-risk drinkers. 500 residents were tested in five borough locations and those in Eltham self-reported the highest rates of alcohol consumption, with 10% identifying as dependent, 9% drinking at high risk, 44% drinking at increasing risk and just 37% drinking within public health guidelines.
- 9.7 This data in this section does not provide insight to the 'hidden harm' of alcohol consumption amongst different cultural or ethnic communities. However, research with community groups and representatives in Greenwich have identified that many are resistant to engage in health surveys, alcohol audits or treatment and support for reasons of shame or dishonour, only presenting with chronic or acute conditions in hospital, long after early interventions could have prevented such illness.
- 9.8 Alcohol has a significant impact and cost on society. In 2021/22 the cost of alcohol harm in Greenwich was £155.9 million, approximately £539 per head (higher than the England average of £485 per head). The cost breakdown to NHS & Healthcare in 2021/22 was £23 million in Greenwich, with alcohol related hospital admissions making up 38% of this at £8.7 million. Analysis of Hospital Episode Statistics show that between 2021 to

2024, 1.7% of all hospital admissions were due to alcohol specific conditions and 6.7% were due to alcohol related conditions⁶⁻⁷.

- 9.9 Between 2020 and 2024 there were 3,826 alcohol related ambulance call outs in Greenwich, with 1,680 requiring conveyances to hospital⁸. In 2021/22, the estimated cost of ambulance related call outs in Greenwich was £4.1 million, and this does not take account of additional costs associated with alcohol related A&E visits (£6.6 million in 2021/22)⁶.
- 9.10 The greatest burden on health services is caused by large numbers of people drinking riskily but not dependently, rather than the relatively small number of people with alcohol dependence.
- 9.11 Alcohol is associated with various types of crime and disorder. National data indicates that overuse of alcohol is implicated in a significant proportion of violent crimes. In 2022/23 in England and Wales, 38% of all violent crimes occurred where the victim believed the offender(s) to be under the influence of alcohol⁹. In depth research carried out in 2016/17 indicates that in England and Wales, 12.4% of theft offences, 20.6% of criminal damage, and 21.5% of hate crimes were alcohol related¹⁰. Additionally, in the year ending March 2024, alcohol-related violent incidents constituted 54% of all violent incidents occurring at the weekend and 61% of those taking place during the evening and night¹¹. Alcohol-related ambulance callouts are also most common during these times, reflecting the increased incidence of alcohol-related harm during evenings and weekends.
- 9.12 There are an estimated 20,280 annual alcohol related crimes occurring in Greenwich with over half for theft (11,533) and the remainder for violence (4,254) and criminal damage (3,338) and the estimated cost of Alcohol related crime and disorder in 2021/22 was £79.9 million in Greenwich (£51.7 million due to the consequences of crime, £25.5 million on the response to crime and £4.6 million on the anticipation of crime)⁶.
- 9.13 Chronic disease caused by alcohol is strongly associated with deprivation, with the highest rates of alcohol-related hospital admissions in Plumstead, Glyndon, Thamesmead Moorings and Kidbrooke with Hornfair (see Fig.2). There is no evidence that more deprived groups drink more alcohol, therefore this pattern is likely to relate to other contributory factors (such as poorer general health among more deprived groups).
- 9.14 Alcohol plays a major role in the 'Feel Well' priorities in the Royal Greenwich Health and Wellbeing Strategy 2023-2028¹². This has been achieved through new funding for drug and alcohol treatment through local partner arrangements to ensure more people will access effective, evidence-based alcohol treatment, reducing harms to individuals' families and communities.
- 9.15 Alcohol plays a major role in the 'Feel Well' priorities in the Royal Greenwich Health and Wellbeing Strategy 2023-2028¹². This has been achieved through new funding for drug and alcohol treatment through local partner arrangements to ensure more people will access effective, evidence-based alcohol treatment, reducing harms to individuals' families and communities.

9.16 The following maps show that chronic disease caused by alcohol (measured by hospital admissions) is higher in areas of deprivation, while the rate of alcohol-flagged offences is highest in areas with the most licenced premises. Areas with the highest concentration of licensed premises are also associated with increased levels of antisocial behaviour, as well as violent and sexual offences, according to national evidence.

9.17 The reference list for this section only is as follows:

Reference list

1. [Institute of Alcohol Studies. Alcohol and health inequalities](#)
2. [UK Health Security Agency. Health Matters: Harmful drinking and alcohol dependence.](#)
3. [NDTMS. Local Outcomes Profiles.](#)
4. [Public Health England. Alcohol dependence prevalence in England: Summary.](#)
5. [NHS England Digital. Adult drinking.](#)
6. [Institute of Alcohol Studies. Cost of alcohol harm in Greenwich.](#)
7. NHS England. Hospital Episode Statistics.
8. London Ambulance Service. Ambulance Episodes.
9. [Office for National Statistics. Nature of crimes: Violence tables.](#)
10. [Police. Alcohol intervention checklist and toolkit.](#)
11. [Office for National Statistics. The nature of violent crime: Appendix tables.](#)
12. [Royal Borough of Greenwich. Health and Wellbeing Strategy 2023 to 2028.](#)

Substance Harm Reduction

9.18 The Council recognises the increasing risks associated with substance harm, including the presence of adulterated drugs and synthetic opioids such as Nitazenes, particularly within late-night venues and large-scale events. While the Licensing Act 2003 does not regulate drug misuse directly, these risks may impact the promotion of the licensing objectives, most notably public safety.

9.19 Applicants and licence holders operating higher-risk premises, such as nightclubs, festivals, or large music events, are therefore encouraged to consider appropriate harm reduction measures as part of their operating model. This may include training for staff on recognising and responding to overdose incidents, participation in borough-led training or awareness initiatives, and the voluntary inclusion of appropriate first aid resources, such as Naloxone, where proportionate to the assessed risk.

9.20 The Council does not, at this time, impose a blanket requirement for such measures across all premises. However, where there is evidence of a heightened risk, such as a history of drug use or drug-related medical incidents, the Council, in partnership with relevant Responsible Authorities, may consider appropriate action. This could include the imposition of specific conditions through the application or review process, or, in serious cases, steps to suspend or revoke the licence in order to safeguard the public and uphold the licensing objectives.

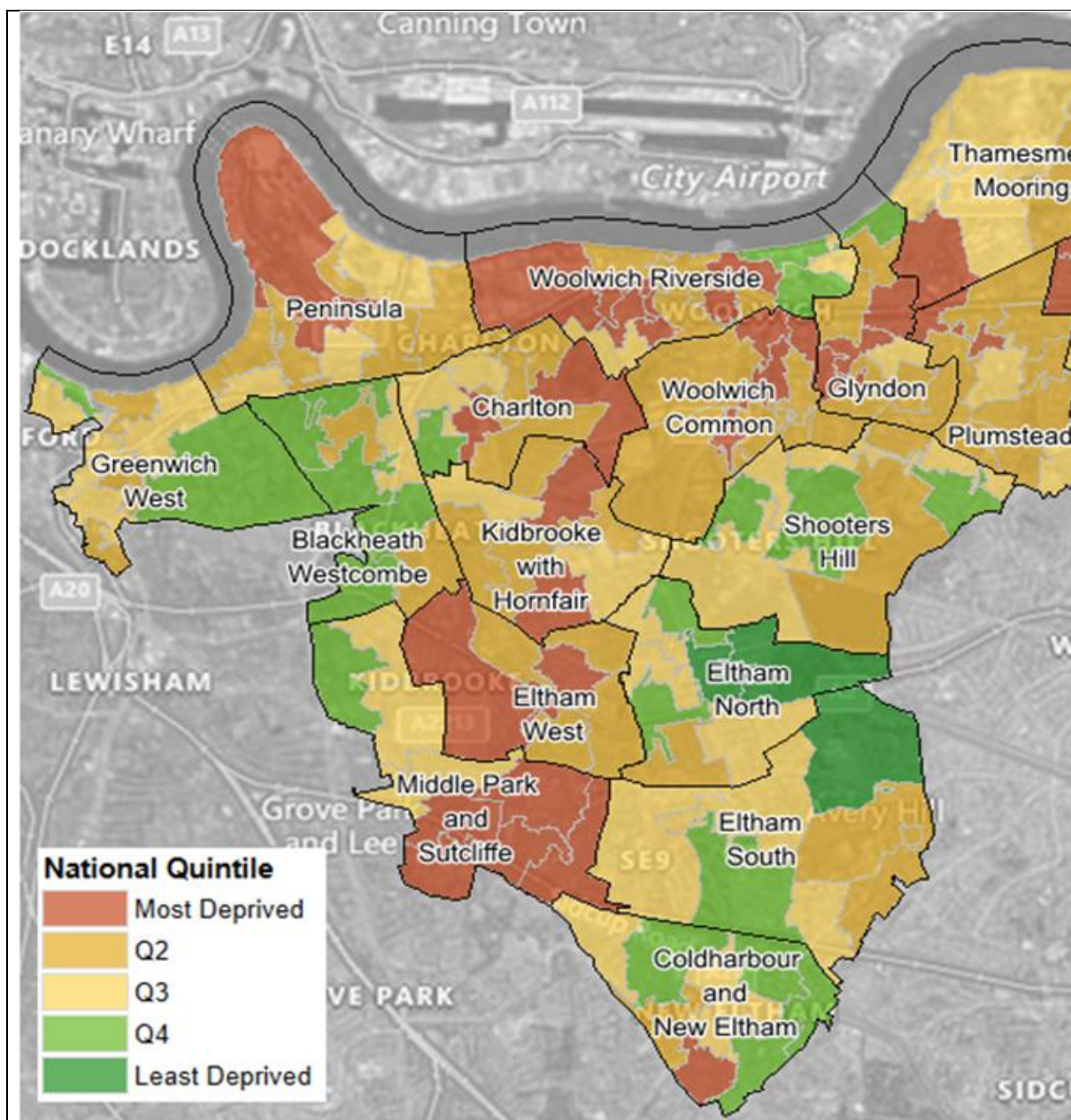
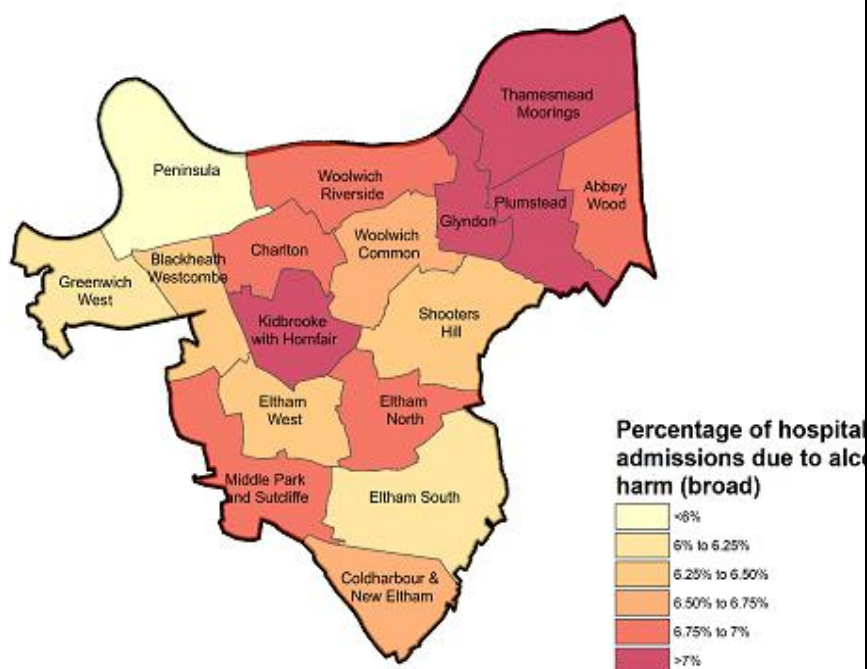


Fig I: Indices of deprivation in Greenwich – 2019.

The proportion of hospital admissions due to alcohol harm (broad)



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Fig 2: Alcohol related hospital admissions – 2021/22 – 2023/24.

Registered Licensed Premises in Greenwich February 2025

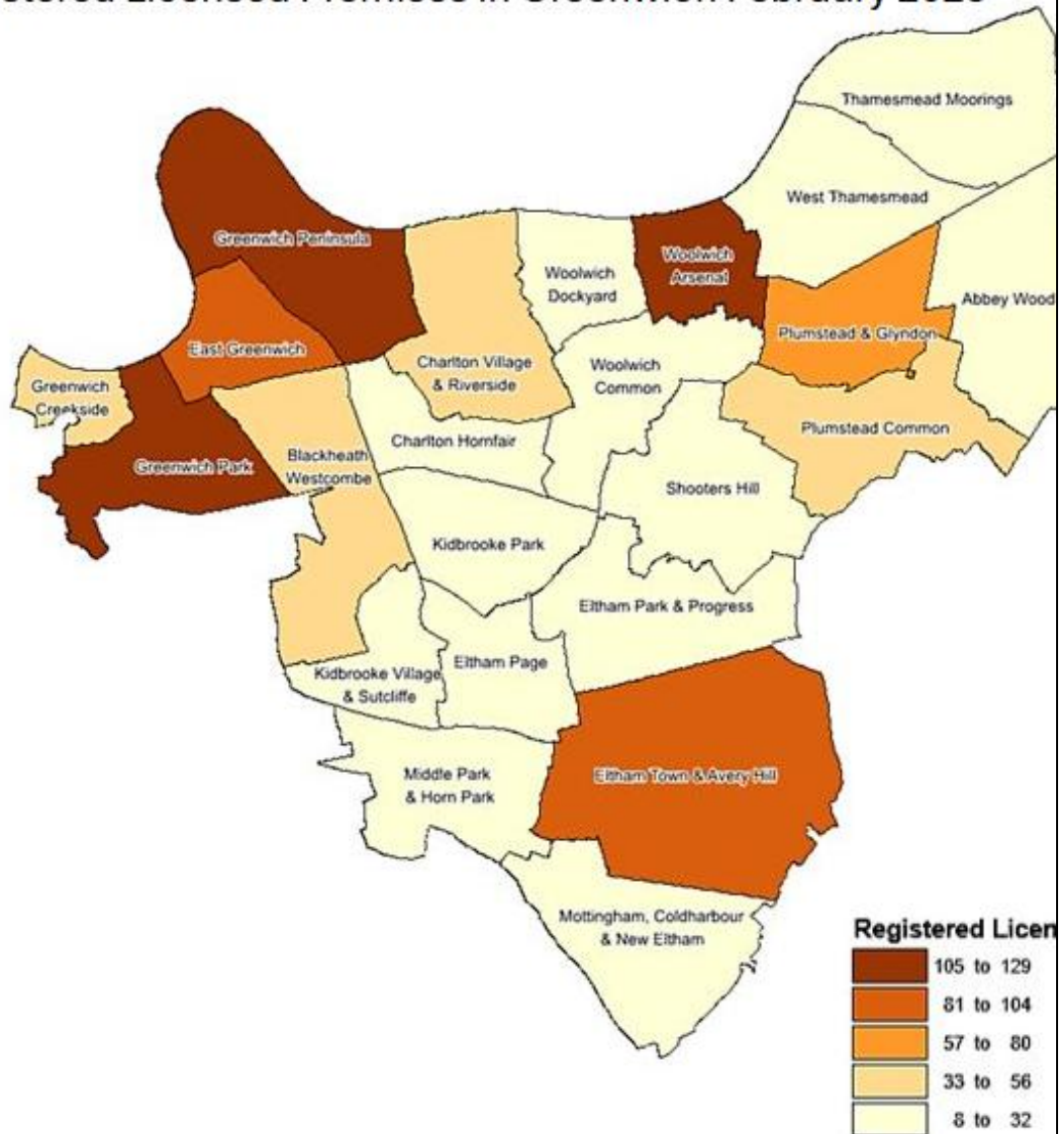
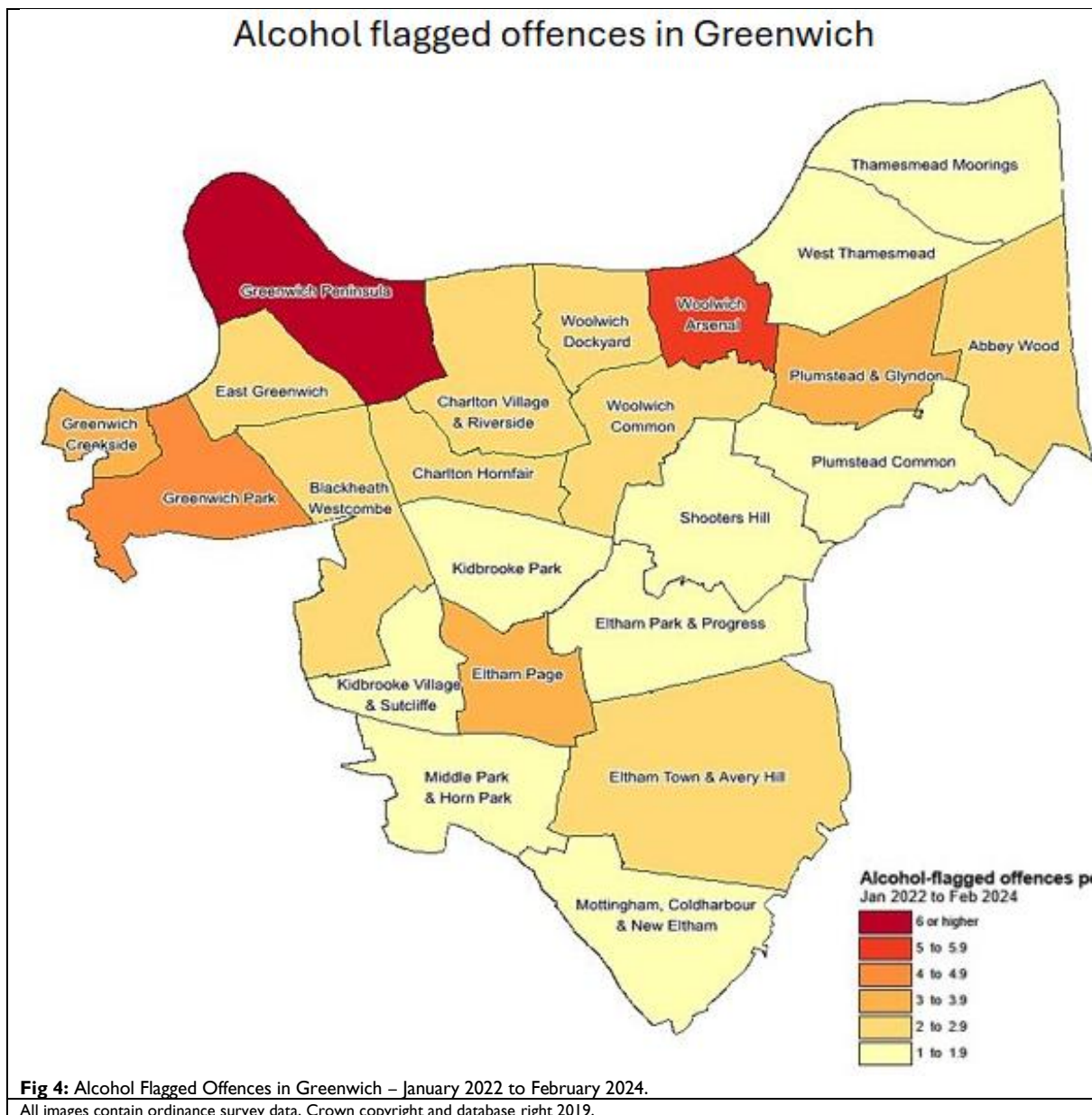


Fig 3: Registered Licensed Premises (Alcohol) – February 2025.



10 Large Outdoor Events

- 10.1 Organisers of individual events requiring a Premises Licence need to be aware of the time limits imposed by the Licensing Act 2003. The Royal Borough encourages applicants to submit such applications a minimum of six calendar months before the proposed event start date to allow sufficient time for the consultation and the decision-making process. In relation to large outdoor events, such as major festivals and carnivals, applicants should establish a co-ordinating committee to ensure the strategic approach to the development of operating schedules. The purpose of this Committee is to ensure that the licence conditions do not conflict with each other, are enforceable and ensure compliance.
- 10.2 Organisers of individual large events with an anticipated audience of more than 1,000 people are expected to attend Entertainment Licensing Safety Advisory Group (ELSAG) Meetings. In these meetings the organisers will have to set out their proposals on the

management of the event with a view to promoting all licensing objectives. Depending on the nature of the event, invited members of the ELSAG may include the Police, Protect/Counter Terrorism, Environmental Health, Fire Brigade, Trading Standards, Building Control, the Highways Authority and the Ambulance Service. ELSAG members will advise the event organiser(s) of the criteria that they have to meet to ensure compliance with the licensing objectives.

- 10.3 The Royal Borough expects the organisers of outdoor events, subject to the premises licence, to address in their operating schedules the measures that they will take to ensure that the licensing objectives are met. The Royal Borough expects all applications for large outdoor events to be accompanied by the following documents: an event management plan, traffic management plan, noise management plan, a stewarding plan, a safeguarding and welfare of vulnerable persons plan, safe structures certification, wind management plan, risk assessments and counter terrorism procedures and training (or any other document specific to the event). The Royal Borough recommends that organisers seek advice from the Licensing Team before submitting their application.
- 10.4 A large temporary event, which cannot be authorised under a Temporary Event Notice due to the numbers of persons attending, will generally be licenced under a time-limited premises licence lasting for the duration of the event. Where regulated entertainment is included, the Royal Borough will set noise limits in line with the Noise Council's "Code of Practice on Environmental Noise Control at Concerts", and guidelines containing recommended noise control procedures.
- 10.5 The applicant is strongly advised to submit a draft Event Management Plan (EMP) prior to submitting a full application. The EMP should set out how the applicant intends to promote all licensing objectives. The consideration should also be given to the inclusion of the specific large temporary event conditions set out in **Appendices E, F, G and H**.

11 Licensing Premises within Policing Footprint of The Valley Stadium

- 11.1 Charlton Athletic Football Club's stadium is a major sporting venue in the Royal Borough of Greenwich. On home match days, the area surrounding the stadium experiences significantly increased footfall and pressure on local infrastructure and public services. This presents elevated risks of crime and disorder, anti-social behaviour, public nuisance, and threats to public safety, particularly in and around licensed premises.
- 11.2 To support the promotion of the licensing objectives, the Licensing Authority will apply additional scrutiny to all applications for new premises licences, or variations to existing licences, for premises located within the defined area footprint of Charlton Athletic Football Club's stadium.

Considerations on Application

- 11.3 Applications within this area must demonstrate a clear and proactive approach to managing the operational challenges associated with match day trading. When determining such applications, the Licensing Authority will consider how the

proposed operation and management of the premises addresses the potential risks associated with match days. These considerations will include, but are not limited to:

- Whether the applicant has identified and understood the specific challenges of trading on match days within the designated area;
- The adequacy of measures proposed in the operating schedule to promote the licensing objectives, particularly during peak times before and after football fixtures;
- The robustness of proposed crowd and queue management plans, including the use of SIA-licensed door supervisors or stewards;
- Controls around the sale and consumption of alcohol, including container types, the management of off-sales, and measures to discourage pre-loading or excessive consumption;
- Measures to prevent public nuisance, such as noise, litter, or loitering, particularly in the vicinity of residential areas;
- The applicant's engagement with the Police, community safety partners, or local match day operations in shaping their proposed controls;
- The applicant's commitment to participate in local partnership initiatives such as Pubwatch, stadium safety briefings, or match day planning meetings;
- The applicant's compliance history, and their ability to operate responsibly in high-risk or sensitive areas.

- 11.4 Where premises are located within area footprint of The Valley Stadium, the Council recognises that match days, particularly those involving high attendance or elevated risk, can present specific challenges to the promotion of the licensing objectives. In such cases, any conditions imposed on a premises licence will be time-limited, proportionate, and clearly linked to the identified risk. The Council will not apply blanket restrictions to all premises in the area but will assess each case on its individual merits. As part of this process, the Council will engage with the Metropolitan Police Football Unit and other relevant partners to determine whether additional controls are required for specific fixtures, taking into account the nature of the event, expected attendance, historical data, and any intelligence relating to crowd management, alcohol-related disorder or public safety concerns.
- 11.5 Where the Licensing Authority's discretion is engaged, applications that do not demonstrate a comprehensive and proportionate approach to these issues are unlikely to be viewed favourably.

Match Day-Specific Conditions

- 11.6 In addition to the above, the Licensing Authority may, where relevant representations are made by the Police or other Responsible Authorities, impose targeted conditions on licences within the stadium policing footprint to address match day risks. These may include, but are not limited to:
- **SIA Door Supervision**
A requirement for SIA-licensed door staff to be on duty before, during and after designated football matches. Timings and numbers should reflect Police advice based on match risk classification.

- **Restrictions on Alcohol Off-Sales**

Temporary restriction or suspension of off-sales of alcohol during defined hours around match days, where deemed necessary to prevent street drinking, disorder or anti-social behaviour.

- **Suspension of Specific Licensable Activities**

A requirement to cease specific licensable activities (e.g. alcohol sales, recorded music) during critical periods where these are assessed to increase risk of nuisance or disorder.

- **Temporary Premises Closure**

A condition requiring the closure of the premises before, during or after a fixture, where necessary to mitigate serious risk to public safety or to prevent serious disorder.

- **Other Proportionate and Time-Limited Measures**

Any further match day-specific conditions necessary to promote the licensing objectives, informed by Police intelligence, operational history, or community impact.

- 11.7 Where such conditions are proposed, the Licensing Authority will work closely with the Metropolitan Police Football Unit, local Safer Neighbourhood Teams, and the applicant to ensure they are lawful, proportionate, and enforceable.

Partnership and Early Engagement

- 11.8 Applicants and licence holders are strongly encouraged to engage early with the Police and Licensing Authority when applying for a licence or reviewing operations within the stadium policing footprint. This will support the development of proportionate controls and allow time for appropriate planning in the context of match day activity.

12 Garages and Primary Use

- 12.1 Section 176 of the Licensing Act 2003 states that a premises licence will not have effect at premises used primarily as a garage or forming part of premises used primarily as a garage. For the purpose of this policy, a "garage" is defined as premises selling petrol or derv or selling or maintaining motor vehicles and accessories. In determining whether premises are "primarily used as a garage," the Licensing Authority will consider the "intensity of customer use", factors such as the number and nature of transactions, and potential footfall data. Where transactional data is relevant, the Licensing Authority will adhere to the principles established in the *Green v Justices for Inner London Area* (1993) case, requiring the exclusion of duty and VAT from all sales figures to ensure an accurate comparison.
- 12.2 While Section 176 of the Licensing Act 2003 restricts the sale of alcohol at premises primarily used as a garage, the Licensing Authority acknowledges that applications for premises licences will be accepted and duly processed. In line with the principles established in the case of *R (on the application of) Murco Petroleum Limited v Bristol City Council* (2010), the question of whether the premises are primarily used as a garage

will be specifically considered by the Licensing Authority if a relevant representation is made on the subject. Such representations must still engage with one or more of the four licensing objectives: the prevention of crime and disorder, public safety, the prevention of public nuisance, and the protection of children from harm. Furthermore, should it be necessary to adjourn a hearing related to such a representation, for example to allow data to be collated, any adjournment will be to a specific date, in accordance with the guidance provided by the Murco case, ensuring timely decision-making.

- 12.3 Where an application for a premises licence is granted for premises that also operate as a garage, or following a review of an existing licence concerning Section 176, the Licensing Authority may impose a condition requiring the licence holder to provide data (transactional or footfall) to demonstrate the primary use of the premises. In such cases, the Licensing Authority will seek to agree the methodology for data collection and the thresholds for determining when the primary use has become that of a garage with the licence holder. However, while all reasonable attempts will be made to reach a mutual agreement, the Licensing Authority ultimately reserves the right to determine the specific data requirements and relevant thresholds it deems necessary.
- 12.4 Where specific intelligence suggests a potential shift towards primary garage use at premises where a licence has already been granted (and a condition regarding primary use was not initially imposed), the Licensing Authority may request information from the licence holder to ascertain the primary use of the premises. If, following the review of this information, it is determined that the premises are now primarily used as a garage, the expectation of the Licensing Authority would be for alcohol sales to be voluntarily suspended until data demonstrates a reversal of this trend. Any further or formal action under the Act would only be considered if a voluntary suspension of alcohol sales was not observed in such circumstances.
- 12.5 The Licensing Authority will strive for consistency in its approach to imposing conditions related to primary use across different types of licensed premises. This section of the policy will be subject to periodic review to ensure it remains compliant with the latest legislation, statutory guidance, and relevant case law. The current version has been reviewed with due regard to the Section 182 Guidance issued by the Secretary of State in February 2025.

I3 Cumulative Impact Policy

- 13.1 The ‘cumulative impact’ on the licensing objectives of a concentration or clustering of multiple licenced premises may rise to a relevant representation when an application for the grant or variation of a premises licence is being considered, but not in relation to an application for review which must relate to individual premises.
- 13.2 The Royal Borough may receive representations from either a Responsible Authority or an “other person” (both defined by the Act), that the cumulative impact of new licences is leading to an area becoming saturated with premises, making it a focal point for large groups of people to gather and thereby creating exceptional problems of disorder and nuisance, or otherwise compromising the licensing objectives, over and above the impact from the individual premises themselves. In such cases, the issue of

saturation may be taken into account when considering the individual merits of any application.

13.3 The Royal Borough has received evidence that the cumulative impact of licenced premises is continuing to undermine the licensing objectives in the following areas:

- Greenwich Town Centre;
- Trafalgar Road and environs;
- Plumstead High Street;
- Woolwich Town Centre;
- Herbert Road (off Plumstead Common Road);
- Eltham Town Centre;
- The O2 and environs.

13.4 These areas will be referred to throughout the remainder of this statement of policy as the Cumulative Impact Zones (CIZs).

13.5 After considering this evidence, the Royal Borough has adopted a cumulative impact policy in respect of these zones.

13.6 The latest evidence for the adoption of the cumulative impact policy together with maps of the cumulative impact zones is attached at **Appendix I** of this policy.

13.7 Within a CIZs, where relevant representations are received, the Royal Borough will generally refuse applications for new premises licences, club premises certificates, or material variations to existing licences, unless the applicant can demonstrate that the proposal will not add to the cumulative impact identified in the area. Applicants are expected to provide clear evidence of how their proposed operation will avoid contributing to cumulative impact. This may include proportionate mitigation measures and, where appropriate, submission of independent assessments or expert evidence. Each application will be considered on its individual merits; however, any intensification of use must be supported by robust and credible steps to prevent further pressure on local services or residential amenity.

13.8 The impact can be expected to be different for premises with different styles and characteristics and in different cumulative impact zones. The Royal Borough recognises that within areas of regeneration, there is a need for an attractive night-time economy that is fully inclusive and encourages families back into the town centre in the evening and most importantly that it is safe. The impact, for instance, of a late night vertical drinking establishment or an off-licence would not be considered beneficial to the licensing objectives, whereas a restaurant with ample seating that closes at 11:00pm could be considered to have a positive impact on the licensing objectives. An applicant within a CIZ will need to demonstrate in their application that, if granted, a licence will have a positive influence on the licensing objectives.

13.9 The Royal Borough recognises that within different CIZs different types of licenced premises mutually benefit from each other's existence, attracting large groups of people. This in turn may increase the possibility of crime and disorder and public nuisance, thus impacting on the promotion of the licensing objectives. For this reason, special

consideration will be given to all classes of licenced premises within the cumulative impact zones.

- 13.10 The adoption of a cumulative impact policy for these areas does not relieve responsible authorities or other persons of the need to make a relevant representation. Before the Royal Borough may lawfully consider giving effect to this cumulative impact policy, a relevant representation must have been made. If no representations are received, it remains the case that any application must be granted in terms that are consistent with the operating schedule and any mandatory conditions required by the Act.
- 13.11 Responsible Authorities and other persons may, however, make written representations, maintaining that it is necessary to refuse an application within the cumulative impact zone for the promotion of the licensing objectives, and in doing so may refer to the evidence considered by the Royal Borough in the adoption of the “cumulative impact policy”.
- 13.12 The Royal Borough will not use any cumulative impact policy:
- As grounds for revoking an existing licence or certificate.
 - Where a complaint relating to a crime or disorder or nuisance situation in a cumulative impact zone is only linked to particular premises.
 - To refuse applications to vary an existing licence or certificate, except where the modifications are directly relevant to the “cumulative impact policy”.
- 13.13 The cumulative impact policy does not include provision for terminal hours in respect of premises within these areas, nor does it impose quotas on the number of licenced premises permitted or the capacity of those premises.
- 13.14 The Royal Borough undertakes regular reviews of the Cumulative Impact Zones (CIZs). These reviews are informed by updated data and assess the ongoing need and effectiveness of each CIZ. This evaluation may lead to decisions to remove, reduce, or expand the CIZ boundaries. Reviews are conducted at least once within the five-year period for which this policy is in effect, and a further review takes place upon its renewal, seeking to ensure the supporting data is no older than three years.
- 13.15 The Royal Borough recognises that there are other mechanisms both within and outside the licensing regime available for addressing the cumulative effect of licenced premises, which may include:
- Planning controls.
 - Positive measures to provide a safe and clean town centre environment in partnership with local businesses, transport operators and other departments of the Royal Borough.
 - The provision of CCTV surveillance in town centres, ample taxi ranks, provision of public conveniences open late at night, street cleaning and litter patrols.
 - The Public Space Protection Order in Woolwich Town Centre, which was renewed and enhanced, on 31st October 2023, and is borough wide, is in force for 3 years. It is used to combat anti-social behaviour in the area by restricting the consumption of alcohol in a public space. Anyone who does not surrender an open container of alcohol when asked by a duly authorised person may be

required to leave the area covered by the Order for 48 hours, and may face a fine. Premises licenced for alcohol sales within the PSPO are not subject to the restrictions when the licence is being used within the ambit of its approved layout plan (or for 30 minutes after). The Royal Borough officers and Licensing Committee will be entirely neutral when considering applications for alcohol licences located with the PSPO.

- Police enforcement of the general law in regard to disorder and anti-social behaviour, including the issue of fixed penalty notices.
- The prosecution of any personal licence holder or member of staff at such premises who is selling alcohol to people who are drunk.
- Police powers to close down instantly for up to 24 hours any licenced premises or temporary event on the grounds of disorder, the likelihood of disorder, or noise emanating from the premises causing a nuisance.
- The powers of Police, other responsible authorities, residents and local business to seek a review of the licence or certificate.

14 Licensing Hours

- 14.1 The Royal Borough recognises that simultaneous closing times in certain areas can lead to peaks of disorder and disturbance on the streets when large numbers of people tend to leave licenced premises at the same time. The licensing objectives will always be a paramount consideration when considering the individual merits of each case.
- 14.2 Shops, stores and supermarkets should generally be permitted to sell alcohol for consumption off the premises during the normal hours they intend to open for shopping purposes. However, in the case of individual shops which are known to be a focus of disorder, or in an area which is the focus of disorder and disturbance, then, subject to representations, a limitation on licenced hours may be appropriate. The same may be true for premises that are within proximity to groups of people particularly vulnerable to alcohol and its impacts, including schools, drugs and alcohol treatment services, gambling establishments, learning difficulties and mental health provisions.
- 14.3 The Royal Borough will deal with the issue of licensing hours on the individual merits of each application. However, when issuing a licence, stricter conditions will be expected regarding noise control in the case of premises that are situated in areas that have a greater density of residential accommodation. This will particularly apply in circumstances where, having regard to the location, size, and nature of the licenced premises, it is likely that disturbance will be caused to residents in the vicinity of the premises by concentrations of people leaving during normal night-time sleeping periods from 23:00 hours to the following 07:00 hours.
- 14.4 The Royal Borough expects applicants to provide a noise management plan as part of the operating schedule where there is to be an outside drinking area or when licenced activities involve amplified music. The suitability of the premises in terms of the building's capacity to limit sound will be considered when decisions are made in respect of applications that include amplified music.

- 14.5 In respect of premises supplying take-away food as a primary activity, there will be a presumption that the Royal Borough will not licence premises to permit the supply of alcohol for consumption off the premises between 23:00 hours and 05:00 hours the following day.
- 14.6 Where premises seek licensing provisions for the supply of alcohol during the nighttime economy, the Royal Borough expects applications to demonstrate how measures will be in place to manage patrons as they leave the premises and mitigate potential nuisance. This includes applying for late night refreshment (on and off the premises) for hours consistent with alcohol sales and any subsequent 'drinking up time' (typically 30 minutes), to facilitate the sale of non-alcoholic hot drinks (e.g., tea/coffee) to departing customers. Furthermore, applicants are expected to detail how adequate waste facilities will be provided for customers to help prevent littering and associated nuisance in the vicinity.

15 Partnership Working with Responsible Authorities

- 15.1 In the Royal Borough of Greenwich there is a collaborative working relationship between planning and licensing. Licensing applications are circulated and discussed prior to the determination, regarding hours of operation and attaching appropriate, proportionate conditions. However, the two regimes remain properly separated thus avoiding duplication and inefficiency. The planning and licensing regimes involve consideration of different, albeit related, matters. Licensing Committees are not bound by decisions made by a Planning Committee, and vice versa. The existence or otherwise of planning permission or building control cannot be considered a determining factor in considering a licensing application or a prerequisite to the granting of a licence.
- 15.2 There are circumstances when, as a condition of planning permission, a terminal hour has been set for the use of premises for commercial purposes. Where these hours are different to the licensing hours, the applicant must observe the earlier closing time. Premises operating in breach of their planning permission would be liable to prosecution under planning law. Proper integrations should be assured by Licensing Committees, where appropriate, providing regular reports to planning committee.
- 15.3 There exist several focus groups / meetings attended by the Licensing team which also promote partnership working.
- 15.4 Greenwich Licensing Partnership Meeting (GLPM). The responsibilities of the GLPM include:
- Agreeing a list of priority premises;
 - Deciding on a partnership response to promote the licensing objectives in relation to the priority premises;
 - Considering and agreeing actions on applications currently being consulted on;
 - Considering and agreeing actions on all applications to be decided at forthcoming Licensing Committee hearings;
 - Considering licensing training needs for partners;
 - Considering and agreeing on appropriate communications in relation to current high-risk venues.

- 15.5 Entertainment Licensing Safety Advisory Group (ELSAG) meetings are organised as part of best practice for large open-air events. ELSAGs are recommended by the Health & Safety Executive (in the Purple Large Events Guide).
- 15.6 Peninsula Security meetings are organised by the O2 and Knight Dragon to proactively address the night-time economy in the environs of the O2.
- 15.7 Trading Standards Officers and Community Safety Officers with responsibility for Prevent and Protect liaise with Responsible Authorities to share intelligence relating to the protection of children from harm. This intelligence is used as a guide to advisory and enforcement actions.
- 15.8 Trading Standards carry out regular covert test purchase procedures to ensure compliance with the mandatory licensing conditions in relation to underage sales, counterfeit and "smuggled goods".
- 15.9 If such sales are made, the evidence provided by Trading Standards, contributes to requesting the review of a licence or additional conditions on the existing licence.
- 15.10 Trading Standards will work to support greater awareness and availability of Proof of Age Standards Schemes (PASS) as an acceptable form of ID for young adults.
- 15.11 Royal Borough's Community Safety & Integrated Enforcement Team role is to reduce the incidence of anti-social behaviour, environmental crime and other community safety concerns to make the Royal Borough a safer, cleaner and healthier place for residents, businesses and visitors. The Licensing team works closely with the Community Safety & Integrated Enforcement Team in the instances these issues occur in licenced premises. This includes sharing intelligence, mapping out the Cumulative Impact Zones (CIZ), supporting enforcement action through the PSPOs and similar schemes, joint days of action, and project work, such as the Reducing the Strength Scheme, which now includes over one hundred off-licenced premises across the Borough. The premises have voluntarily removed super-strength beers, lagers and ciders of 6.5% ABV and higher and have limited the sale of single cans.

16 Licence Reviews

- 16.1 A Premises licence, once granted, lasts for the lifetime of the business and is not subject to annual or automatic renewal. The proceedings set out in the 2003 Act for reviewing premises licences and club premises certificates represent a key protection for the community where problems associated with the licensing objectives occur after the grant or variation of a premises licence or club premises certificate.
- 16.2 The Royal Borough recognises that the promotion of the licensing objectives relies heavily on a partnership between premises licence and club premises certificate holders, authorised persons, other persons and Responsible Authorities in pursuit of common aims. The Royal Borough will endeavour to give premises licence and club premises certificate holders early warning of their concerns about problems identified at the premises and the need for improvement. The Royal Borough, where time allows, are

prepared to facilitate mediation between the licensee and those who may be intending to review the licence.

- 16.3 Reviews can be sought at any stage following the grant of a premises licence or club premises certificate by a Responsible Authority or any other person who can demonstrate they are affected by licensable activities taking place at premises. This includes local Ward Councillors or bodies such as residents or business groups. An application for review may be requested as a result of matters arising at the premises in connection with any of the four licensing objectives.
- 16.4 Reviews may arise where there is a change of circumstances or use of a premises, such as a new residential development in what was previously a predominantly commercial area or a change in the premises operation giving rise to complaints that impact on the promotion of the licensing objectives. In these circumstances, complaints should initially be directed to the Licensing Authority and the Police for investigation and to provide evidence for any possible review proceedings.
- 16.5 While serious issues of crime, disorder, and safety will be investigated and enforced through the responsible authorities, such as the Police, it remains the right of residents and traders to request a review of a premises licence at any time by completing the review application form. This may be an appropriate course of action to take where there are ongoing or multiple issues that when taken in isolation may seem trivial, but collectively or over an extended period of time cause genuine nuisance and issues for members of the public living or working nearby.
- 16.6 Where reviews are submitted, the licensing sub-committee has a wide range of decision options open to it, although it should be noted that immediate revocation of a licence in the first instance may not necessarily be considered a proportional outcome. Such a review may instead seek to introduce measures of mitigation to the problems identified, for example, a reduction in permitted hours or the introduction of conditions similar to those within our model conditions (see Appendices A through H).
- 16.7 On receipt of a valid application for review, RBG will advertise the application for review on the RBG website. RBG will hold a formal review hearing to consider the issues raised in the request to review the licence, and any representations that are received in response to the consultation. Where proposed conditions have been agreed between all parties the Licensing Review Sub-Committee will consider these proposals. The Licensing Review Sub-Committee will then issue its decision, for which all involved parties have right of appeal through the magistrate's court.
- 16.8 Where a licence is retained, but problems reoccur or are not resolved, subsequent reviews may be applied for which, in turn, may attract stronger sanctions.
- 16.9 Those requesting a review are invited, and strongly encouraged, to attend the Licensing Review Sub-Committee hearing along with those who made representation, though this is not a legal requirement and hearings can proceed in their absence.

- 16.10 The Royal Borough of Greenwich accepts applications for review electronically without the requirement for a hard copy. However, these applications are outside the formal electronic application process and may not be submitted via GOV.UK or the Royal Borough's electronic facility.
- 16.11 In addition, the Royal Borough of Greenwich must review a licence if the premises to which it relates was made the subject of a Closure Order by the Police based on nuisance or disorder and the appropriate magistrates' court has sent the Royal Borough of Greenwich the relevant notice of its determination, or if the Police have made an application for summary review on the basis that premises are associated with serious crime and/or disorder.
- 16.12 A review of a premises licence or club premises certificate must relate specifically to the individual premises and the licensable activities authorised under that licence or certificate. For clarity, such a review cannot be based on activities authorised by a Temporary Event Notice (TEN). TENs operate under a separate legal framework within the Licensing Act 2003, which includes its own provisions for addressing any concerns arising from events held under a TEN. Consequently, it is not permissible to seek a review of a premises licence based on activities conducted under a TEN, nor is it legally possible to condition a premises licence to prevent the use of TENs at the premises.
- 16.13 The Royal Borough may reject an application made by other persons if it determines that the grounds for the review are considered not relevant, or is considered to be vexatious, frivolous or repetitious, as defined within the section 182 Guidance. The Royal Borough may not reject an application for review on these grounds from a Responsible Authority.
- 16.14 Premises subject to review must display a statutory notice so it is visible to passers-by, stating the grounds for review and advising those who wish to make a representation to write to the Licensing Section of the Royal Borough. The Royal Borough will also place similar notices on the exterior of the Town Hall opposite where the Licensing Authority is based and on the Royal Borough of Greenwich website.
- 16.15 The Royal Borough of Greenwich accepts written representations to reviews electronically without the requirement for a hard copy. Representations may be amplified at the subsequent hearing or may stand in their own right. Additional representations which do not amount to an amplification of the original representation may not be made at the hearing.

17 Summary Reviews

- 17.1 Summary reviews can be undertaken when the Police consider that the premises concerned are associated with serious crime or serious disorder, or both. The summary review process allows interim conditions to be quickly attached to a licence and initiates a fast-track licence review. The power applies only where a premises licence authorises the sale of alcohol.

- 17.2 The Police have the power to summarily review a premises licence with immediate effect where a Senior Police Officer considers the premises are associated with serious crime or serious disorder or both. The Royal Borough will consider any immediate interim steps that may include modifying the licence conditions, suspending the licence, or removing the designated premises supervisor (DPS). The Royal Borough shall carry out a full review of the licence within 28 days. The Royal Borough may take steps without consulting with the licence holder. If interim steps are taken, the Royal Borough shall immediately notify the licence holder and the Police. The licence holder is entitled to make representations at this stage and a hearing will be held to allow this.
- 17.3 The full licence review shall be held within 28 days of the original Police Summary Review application. The review may result in modification of the licence conditions, removal of the DPS, suspension of the licence for up to three months, or revocation of the licence. Representations will be accepted from any other person or Responsible Authority either on behalf of or against the licence holder.

18 Temporary Event Notices

- 18.1 Temporary Event Notices, or TENs, may be submitted where a premises user seeks to provide licensable activities at events that are not authorised by an existing premises licence, or in venues or locations where no licence is held, subject to the following limitations:
- The event shall have a capacity of no more than 499, inclusive of attendees, staff and performers, etc;
 - The event shall last no longer than 168 hours (7 days);
 - No more than 15 events will be held at any one premises within a calendar year;
 - The maximum number of aggregate days that TENs may cover within a calendar year is 21;
 - Consecutive TENs must be submitted with at least a 24-hour gap between them, where they are submitted by, or on behalf, of the same premises user;
 - A Personal licence holder may submit up to 50 TENs per calendar year (of which up to 10 may be “late” as described below);
 - Non-personal licence holders may submit up to five TENs per calendar year (of which up to two may be “late” as described below).
- 18.2 If any of the limits above are exceeded, the Royal Borough will issue the premises user with a Counter Notice, nullifying the TEN and prohibiting licensable activities from taking place.
- 18.3 There are two types of TEN: a standard TEN and a late TEN. These are subject to different processes: a standard notice is given no later than ten working days before the event to which it relates; and a late notice is given not before nine and not later than five working days before the event. “Working days” exclude the day the notice is received and the day or first day of the event; Saturdays & Sundays; and any intervening bank holiday. TENs given less than five days before the event to which it relates will be returned as void and the activities to which it relates will not be authorised. There is no exception to this, nor can discretion be exercised.

- 18.4 Premises users must submit their TEN to the Royal Borough's Licensing Department, with copies supplied to the Royal Borough's Environmental Health departments, and to the Greenwich Licensing Unit in the Metropolitan Police. The only exception is where TENs are submitted and paid for through electronic means (e.g. online), in which case the Royal Borough will forward the application onto all relevant parties on the premises user's behalf.
- 18.5 Where the TEN is in order, the relevant fee paid, and the event falls within the prescribed limits, the Royal Borough will record the notice in its register and send an acknowledgement to the premises user within two working days. However, the event will not be authorised until the consultation period has expired.
- 18.6 The Police and Environmental Health have a period of three working days from when they are given the notice in which they may object to it on grounds related to the promotion of one or more of the four licensing objectives.
- 18.7 For standard TENs, where an objection is given, there is provision under the legislation for the Police or Environmental Health to agree with the premises user to modify the TEN in terms of activities sought and times permitted, or where there is a pre-existing premises licence, for conditions from that licence to apply to the activities authorised by the TEN. If all parties agree, the objection(s) may be treated as withdrawn and the licensable activities shall be authorised. If agreement cannot be reached, the notice will be deferred to the Authority's Licensing Sub-Committee to determine whether to uphold the objection(s), or whether to allow the event to proceed, with or without conditions, as the Sub-Committee deem appropriate.
- 18.8 In the case of late TENs, if objections are received from either the Police or Environmental Health, the event will not be permitted, and a Counter Notice will be issued, instantly nullifying the TEN. Because of the short timescales, there is no scope for modification of the TEN and no right of appeal, nor recourse for a hearing before our Licensing Committee.
- 18.9 It should be noted that a Temporary Event Notice does not absolve the premises user of any responsibilities under any other legislation, such as planning law – i.e. a TEN does not override restrictions, such as those regarding the terminal hour of operation of the premises, on its planning permission.
- 18.10 When a TEN is submitted, the Royal Borough expects that the following information will be provided:
- Evidence of permission to use outside space for an event, specifically where the outside space is Council or public land.
 - A clear description of the area in which they propose to carry out the licensable activities.
 - A risk assessment including how many people will be attending the event.
 - Information with regards to age-related events, with an emphasis on 18th & 21st Birthdays.

- 18.11 It should be noted that any events whereby SIA security are used, with the potential for interaction with persons under 18 years, those SIA staff are required to be 'enhanced trained'.
- 18.12 Where a Temporary Event Notice is submitted at locations where a premises licence may also have effect, the Royal Borough strongly encourages applicants to uphold the standards established by the existing premises licence. It is expected that, where applicable, relevant conditions on the premises licence (other than those directly relating to the licensable hours which the TEN is intended to extend) will be observed for the duration of the TEN. To clearly indicate their commitment to maintaining these standards, within the TEN event description, applicants may wish to include wording such as 'We will operate this event in accordance with the conditions of premises licence reference [number] save for the extended hours'.
- 18.13 Applicants considering events exceeding the 499-person capacity limit should apply for a Premises Licence, as Temporary Event Notices (TENs) are intended under the Licensing Act for small-scale events only. The Royal Borough views the practice of submitting multiple TENs across the same or adjacent premises for what is effectively a single, large event as contrary to the intent of the legislation and the promotion of the licensing objectives. While the Authority will assess each application fairly and holistically to distinguish genuinely separate events that may occasionally utilise adjacent TENs, any attempt to deliberately bypass the 499-person threshold will be met with robust opposition from the Licensing Authority and other responsible authorities, and the relevant TENs are likely to be rejected or refused.
- 18.14 Applicants for a TEN should be aware of the requirements of the Terrorism (Protection of Premises) Act 2025 (the 2025 Act), which places duties on those responsible for certain premises and events to take proportionate steps to increase preparedness for, and protection from, terrorist attacks. A TEN permits an event for a maximum of 499 persons (including staff and attendees). As this capacity is below the threshold for a 'Qualifying Event' under the 2025 Act (800 or more persons), events held solely under the authority of a TEN are unlikely to trigger the event-specific duties of the 2025 Act. However, applicants should be mindful that the premises where a temporary event is held may itself be a 'Qualifying Premises' under the 2025 Act if its usual expected capacity is 200 or more persons for relevant uses. In such cases, the person responsible for the premises will have ongoing duties under the 2025 Act, and the TEN holder may need to cooperate with them regarding security arrangements for the duration of the event. Even where an event authorised by a TEN does not trigger specific duties under the 2025 Act, implementing appropriate safety and security precautions remains best practice to protect the public and staff. Applicants are encouraged to refer to official Government guidance on the 2025 Act, as it becomes available. This guidance, once published, will provide information on protective security measures that can inform proportionate safety and security planning for any event.

19 Smoking and Tobacco Vaping and the use of External Areas

- 19.1 Where an application includes provision of a smoking shelter, the Royal Borough

expects the shelter to be situated as far as possible from residential premises and children's play areas. Consideration should be given to the prevailing wind direction when locating the smoking shelter, to minimise the nuisance caused by smoke drift to residential properties.

- 19.2 Any external smoking shelters must conform with the "50% Rule" of the Health Act 2006 ("the smoke-free legislation"). Put simply, this means that any smoking area with a roof cannot be surrounded by walls that encompass more than half of the available space. For the purpose of calculating the available space, any area that can be closed (e.g. door, windows, sliders or shutters, etc) must be treated as if it were closed. The smoke free regulations can be found here <https://www.legislation.gov.uk/ukxi/2006/3368/contents>. Licensees should consult the Environmental Commercial Team for clarification if needed.
- 19.3 In relation to smoking outside licenced premises, the Royal Borough expects:
- The provision and maintenance of suitable receptacles for customers to dispose of cigarette litter in areas used, or likely to be used, for smoking;
 - Licensees because of the potential for noise nuisance, should take all reasonable steps to discourage smoking and vaping on the public highway close to residential premises, particularly after 22:00 hours. This could include measures such as a ban on customers taking drinks outside on to the public highway, restricting the number of people smoking and vaping outside, the use of a cordoned-off section of the highway as a smoking and vaping area, the use of door supervisors, or imposing a time after which re-admissions to the premises will not be permitted.
 - Garden areas (e.g. a pub beer garden) to be cleared at a reasonable time where not doing so could cause nuisance to neighbouring residents.
 - Where alcohol consumption takes place at exterior tables and chairs, a licence variation will be required if the supply of alcohol takes place outside the premises or if the licence prohibits drinks being taken outside.
 - Smoking is not permitted near to the major access and egress points to the premises, especially those that may be used by children.
- 19.4 Smoking shisha is an increasingly popular activity across all ethnic groups, though particularly among young people. While there are not many shisha bars operating in Royal Greenwich currently, there has been an increase in enquiries about operating shisha bars, often as an addition to serving alcohol. Shisha, regardless of whether it contains tobacco, produces second-hand smoke or fumes and is therefore covered by smoke-free legislation when used in public spaces. Adherence to this legislation, including requirements for adequate ventilation where shisha use is permitted (such as the 50% open rule for designated outdoor tobacco/coal shisha areas), is fundamental for public comfort and crucial for protecting the health and safety of staff, supporting licensees in meeting their duties under workplace safety legislation.
- 19.5 Beyond tobacco, licensees should be mindful of emerging health data concerning non-tobacco shisha and vaping alternatives. While specific regulations in this area may evolve (and licensees must comply with any future requirements regarding vaping products), considering the potential health risks, extending indoor restrictions to these

activities is advisable as a proactive measure to ensure a safe environment for both customers and staff.

- 19.6 All shisha product supplied must be legal, have duty paid, comply with labelling requirements, and, if containing nicotine, be notified to the MHRA. Like tobacco products, any nicotine-containing shisha or vaping products are age-restricted and may not be sold to young people under 18 years of age.
- 19.7 Licensees who wish to consider operating premises that include shisha alongside the supply of alcohol must ensure they can do so in full compliance of all the requirements of Planning, Environmental Health, and Trading Standards, in addition to their licensing obligations and general duties around safety at work. Contacts:
- Planning: https://www.royalgreenwich.gov.uk/info/200160/contact_us/2006/contact_planning
 - Trading Standards: https://www.royalgreenwich.gov.uk/info/200211/trading_standards/815/trading_standards_business_advice
 - Environmental Health: https://www.royalgreenwich.gov.uk/info/200160/contact_us/2000/contact_environmental_health.
- 19.8 The Royal Borough Trading Standards and Public Health departments work closely together in reducing the prevalence of smoking in the Borough. Smoking is much more prevalent in deprived communities. The cost of buying illegal tobacco can be as little as half the cost of legitimate products. Where cheap illicit tobacco is available, this makes it more affordable and attractive to young people, increasing the uptake of smoking. It also undermines wider tobacco control efforts and does not support smokers wishing to stop. The main concerns about illegal tobacco are:
- Availability of illegal tobacco and the sale of singles makes it more likely that children will start smoking and damage their health.
 - Illegal tobacco has strong links to low-level and large-scale organised crime.
 - It brings crime into our communities.
 - It undermines 'stop smoking' services and makes it harder for smokers to quit.
- 19.9 Illegal cigarettes may be fake or counterfeit, foreign labelled or smuggled. They will therefore not have paid UK duty, may not comply with the labelling and health warning requirements, and will not meet the Reduced Propensity Cigarettes Regulations 2011, which were introduced to reduce the number of domestic fires and deaths caused by discarded and unextinguished cigarettes. The Guidance issued under Section 182 of the Licensing Act 2003 states that the sale and storage of smuggled tobacco (and alcohol) is a serious criminal activity, and that authorities will use the licence review procedure to deter such activities. Where reviews arise, and the Licensing Authority determines that the crime prevention objective is being undermined through the premises being used to further crimes, it is expected that revocation – even in the first instance – shall be seriously considered.
- 19.10 The Royal Borough therefore expects licensees to report to Trading Standards any suspicions of sales, or offers for sale, of illegal / illicit tobacco on their premises: 020 8921 8223 or tradingstandards@royalgreenwich.gov.uk.

20 Alterations to Licensed Premises Plans & Licences

- 20.1 The plans submitted as part of an application for a premises licence or club premises certificate under the Licensing Act 2003 form a legally enforceable part of that authorisation. These plans must accurately reflect the layout, use of areas, and other relevant features of the premises in accordance with the statutory requirements. No alterations to these plans may be made without the proper authorisation of the Licensing Authority.
- 20.2 Licensees or club secretaries must always consult with the Royal Borough's Licensing Service prior to making any changes to the layout or use of a licensed premises that may affect the submitted plans. Failure to do so may result in enforcement action or render licensable activities unauthorised.
- 20.3 Alterations to a licensed premises may require one of the following applications, depending on the nature and extent of the proposed changes:
- **Minor Variation:** A minor variation application may be appropriate where the proposed change is small and is not expected to adversely affect the promotion of the licensing objectives. Examples may include minor adjustments to internal layout (such as moving a non-licensed counter), small changes to licensable hours, or the addition of conditions agreed with the Licensing Authority. These applications are subject to an expedited consultation process.
 - **Full Variation:** If the proposed change could impact the licensing objectives, such as a significant alteration to the layout, change in capacity, new access or egress points, reconfiguration of licensed areas, or the addition of regulated entertainment, then a full variation application must be submitted. This follows the full statutory consultation and hearing process as set out in the Licensing Act 2003.
 - **New Premises Licence or Club Premises Certificate:** In cases where the changes are so extensive that they effectively amount to a substantially new operation or use of the premises, the Licensing Authority may require the applicant to submit a new application rather than a variation.

Minor Variations to Plans

- 20.4 The Royal Borough will only accept an application as a minor variation where it is satisfied that the proposed changes will not have an adverse impact on the promotion of the licensing objectives. The decision to accept or reject an application as a minor variation lies with the Licensing Authority and will be made on a case-by-case basis. In considering such applications, the Authority will have regard to the scale and nature of the changes, any relevant representations, and the operating context of the premises.
- 20.5 Where there is any potential for the proposed changes to compromise the licensing objectives, the applicant will be advised that a full variation or, where appropriate, a new premises licence or club premises certificate application is required.

21 Enforcement

- 21.1 The Royal Borough has established enforcement protocols with the Metropolitan Police, Home Office Immigration and other regulatory services within the Council. These protocols provide for focused enforcement of problem high-risk premises breaching the licensing objectives, but with a lighter touch being applied to low-risk premises where there is no evidence of breach.
- 21.2 The Royal Borough fully recognises the role businesses play in supporting our social life and the local economy. The Royal Borough will work with the Police to ensure that effective action is taken to deal with unlicensed activity, breaches of licence conditions, or crime and disorder associated with licenced premises. It should be noted that investigations will be undertaken through a range of means including overt and covert operations. It should be noted that the Royal Borough's Trading Standards Officers or the Police will carry out test purchases of alcohol using young volunteers. Follow up visits to licenced premises will include inspection for the presence of duty-evaded or counterfeit products.
- 21.3 An ongoing risk-based enforcement programme is in place to ensure we respond to complaints of non-compliance with licence conditions and we concentrate on areas where licenced premises are perceived to be contributing to anti-social behaviour. A sample of premises may also be inspected from time to time to ensure that the premises are operating in accordance with relevant licensing requirements.
- 21.4 The Royal Borough's Trading Standards team carry out regular covert test purchase procedures to ensure compliance with the mandatory code in relation to underage sales, counterfeit and duty evaded goods. If such sales are made, the evidence provided by Trading Standards contributes to requesting the review of a licence or additional conditions on the existing licence.
- 21.5 In general, action will only be taken in accordance with agreed enforcement principles outlined in the Regulators' Compliance Code and in line with the Royal Borough's Enforcement Policy. To this end, the key principles of consistency, transparency, accountability, proportionality and targeted action will be maintained.

22 Tackling Male Violence Against Women and Girls (MVAWG)

- 22.1 The Royal Borough of Greenwich is committed to making the borough a place where all women and girls feel safe and respected. Licensed premises play a crucial role in achieving this goal, especially during the evening and night-time hours. This section sets out the Royal Borough's expectations for licensed venues to take proactive, practical and preventative steps to reduce the risk of male violence against women and girls (MVAWG), including sexual harassment, intimidation and assault.
- 22.2 This section supports and reinforces the wider Royal Borough of Greenwich Women's Safety Charter, which all licensed venues are encouraged to sign up to and display prominently on their premises. The Charter promotes a zero-tolerance approach to

harassment and sets out core principles which licensed venues should adopt to help foster a culture of safety, dignity and respect.

22.3 The Royal Borough expects that all operators of licensed premises:

- Promote a culture that does not tolerate harmful language, behaviour or attitudes towards women and girls;
- Take all reports of harassment or intimidation seriously and respond swiftly and appropriately;
- Provide an environment that is equal, inclusive and safe, especially during evening and night-time operation;
- Empower staff to identify and challenge inappropriate behaviour and support those who disclose experiences of harassment or violence.

22.4 Applicants are strongly encouraged to include the following within their operating schedules, where relevant:

- Adoption of the Royal Borough's Women's Safety Charter and public commitment to its principles;
- Staff training on gender-based harassment, safeguarding and how to respond to disclosures (including use of schemes such as Ask Angela, WAVE and Good Night Out);
- Ensuring appropriate physical safety measures, such as adequate lighting, safe transport options, and safeguarding arrangements at closing time;
- Use of clear signage inside venues to promote zero tolerance for harassment and how to report concerns to staff;
- Commitment to taking every report seriously and responding in line with clear venue procedures;
- Routine assessments of customer safety, especially for venues open late at night or where alcohol is the primary offer;
- Participation in local safety schemes and Pubwatch groups and use of intelligence sharing platforms to identify repeat offenders.

22.5 Where relevant representations are made, or where risks are identified through enforcement or partner intelligence, the Royal Borough may consider imposing proportionate licence conditions that address women's safety and reduce the risk of gender-based harm. These may include mandatory safeguarding training, improved reporting mechanisms, or environmental design interventions to improve visibility and exit routes.

22.6 For venues or activities within licensed premises where there is evidence of an increased risk of male violence against women and girls (MVAWG), the Royal Borough expects both applicants and existing licence holders to demonstrate how such risks will be proactively addressed. This includes providing details of staff training programmes focused on recognising and responding to abusive or predatory behaviour, for example, participation in WAVE (Welfare and Vulnerability Engagement), Ask for Angela, or similar initiatives. Licence holders should also explain how training will be recorded, regularly reviewed, and kept up to date.

- 22.7 In addition, premises are expected to maintain appropriate incident and refusals logs that document actions taken in response to individuals, particularly men, exhibiting abusive, predatory, or violent behaviour towards women, including those who have been identified, detained, or removed from the premises. Broader welfare measures should also be in place, proportionate to the nature of the venue and its risk profile, with clear consideration given to how women's safety and wellbeing are supported in practice.
- 22.8 In assessing an applicant's suitability or premises conduct, the Royal Borough may consider any evidence of tolerance or failure to prevent sexual harassment, intimidation, or other forms of violence against women. Failure to take proactive and proportionate action may call into question the suitability of the licence holder or operator under the crime and disorder, public safety and protection of children from harm licensing objectives.
- 22.9 The Royal Borough will continue to work with the Metropolitan Police, Safer Business Network, Women's Safety Officers, local community groups and venue operators to:
- Improve data collection and reporting of gender-based harm in the night-time economy;
 - Deliver joint campaigns to raise awareness and challenge behaviour;
 - Offer tailored training to venues and security staff;
 - Monitor and evaluate the impact of licensing and non-licensing interventions.
- 22.10 The Royal Borough welcomes and encourages ongoing dialogue with women and girls, frontline workers and communities to ensure this approach remains effective, inclusive and evidence-led.

Anti-Spiking Measures

- 22.11 The Royal Borough recognises that spiking is a serious and underreported form of harm that disproportionately affects women and vulnerable people. Incidents of spiking may involve the surreptitious addition of drugs or alcohol to a person's drink or body without their knowledge or consent. Spiking poses a significant threat to public safety and undermines confidence in the night-time economy.
- 22.12 To help prevent and reduce the risk of spiking, the Royal Borough expects licensed premises, particularly those operating late at night or serving alcohol as a primary activity, to consider the following measures:
- Staff training on identifying and responding to suspected spiking incidents, including safeguarding procedures and emergency response;
 - Clearly displaying anti-spiking awareness posters and zero-tolerance messages inside the premises;
 - Making anti-spiking resources available, such as drink covers, bottle stoppers, or test kits;
 - Ensuring any incidents of suspected spiking are promptly recorded, reported to Police, and supported with CCTV evidence where available;
 - Ensuring the presence of trained welfare staff and/or first aiders in higher-risk venues;

- Encouraging customers to report suspicious behaviour and working with partners to share intelligence on repeat offenders or emerging threats.

22.13 The Royal Borough may attach relevant licence conditions in response to concerns about spiking or where necessary to promote the licensing objectives. These may include the adoption of specific operational policies, use of preventative tools, enhanced staff training, or CCTV requirements. The Licensing Authority expects all licensed venues to take spiking seriously and to foster a culture of vigilance and safety that reassures the public and supports victims.

23 Integrating Strategies

23.1 Licensing law is a key aspect of a holistic approach to the management of the night-time economy in town centres to ensure that everyone in Greenwich is safer and feels safer. However, licensing law is not the primary mechanism for the general control of nuisance and anti-social behaviour by individuals once they are away from licenced premises and beyond their direct control. Managing the night-time economy requires a multifaceted approach which Licensing law and the integrating strategies promoted by Royal Greenwich aim to support.

23.2 By consulting widely prior to this policy statement being published, the Royal Borough aims to secure proper integration with local crime prevention, planning, transport, tourism, equality schemes, Public Health's Addictions strategy, cultural consideration and other strategies introduced for the management of town centres and the late night-time economy. Many of these strategies are not directly related to the promotion of the licensing objectives, but, indirectly, impact upon them. Co-ordination and integration of such policies, strategies and initiatives are therefore important.

23.3 The Royal Borough "Our Greenwich" Corporate Plan 2022- 2026, includes the objectives of a Everyone in Greenwich is safer and feels safer; that Town centres, high streets and shopping parades are vibrant, prosperous, well-maintained places that meet the needs of local people and Neighbourhoods are vibrant, safe and attractive with community services that meet the needs of local residents.

23.4 The Safer Greenwich objective outcomes are:

- Children and young people are at less risk of violence and exploitation.
- Women and girls are safer and feel safer.
- Victims of crime are better supported.
- People using public spaces are safer from anti-social behaviour and crime.
- Royal Greenwich is a welcoming place that is able to provide sanctuary to those fleeing conflict or crisis.

The Town Centre objectives outcomes are that:

- These spaces are more attractive, safer places for people to spend time in.
- Shops and services better meet the needs of people who then spend more money locally.

- We do not lose out town centres, high streets and shopping parades to residential development.
- Town centres, high streets and shopping parades are more accessible making it easier for people to travel to and from them.
- Town centres, high streets and shopping parades help drive local economic growth by providing opportunities for businesses.

The Safer Neighbourhoods objectives are that:

- Neighbourhoods are safer and cleaner places.
- Neighbourhoods are culturally vibrant spaces.
- Neighbourhoods are more accessible for all residents.
- Neighbourhoods promote health and wellbeing by providing spaces for exercise and socialising.
- Residents have a voice in how we develop and improve our neighbourhoods.

- 23.5 Services within Community Safety and Environmental Health are at the heart of the Royal Borough Integrated Enforcement (IE) approach, increasing collaboration, co-ordination and communication across internal and external partners to deliver better community safety outcomes for residents' businesses and visitors to borough.
- 23.6 Safer Communities enables the Royal Borough to meet its statutory responsibilities in working with partner agencies, bodies and groups to reduce crime and disorder within the Borough boundaries. It co-ordinates the Safer Greenwich Partnership and leads on the production and implementation of the Royal Borough Community Safety Plan. It is also involved in a number of operational crime reduction panels and initiatives particularly focused on key thematic areas such as domestic abuse, violence against women and girls, modern slavery and hate crime.
- 23.7 The Government's Drug Strategy: From Harm to Hope (December 2023) identifies a number of priorities to reduce problems associated with under-age drinking, reducing public drunkenness and the health risks associated with irresponsible drinking, and prevent alcohol-related violence.
- 23.8 There is consistent evidence that the price, availability and marketing of alcohol are related to harm from alcohol.
- 23.9 The Safer Spaces service area brings together our new and enhanced Community Safety Enforcement and CCTV teams to deliver a more cohesive approach to delivering safer, and cleaner, public spaces across the Royal Borough of Greenwich. Safer Spaces is responsible for improving community safety outcomes primarily throughout the Royal Borough's main town centres, secondary shopping areas, and parks. In support of the Royal Borough's approach to Integrated Enforcement, the service also works collaboratively with other enforcement colleagues and agencies, and in other parts of the borough as required.
- 23.10 There is clear correlation in Royal Greenwich between wards with a higher density of licenced premises and the rate of alcohol-related crime, and ambulance call-outs (particularly for young people).

- 23.11 Although there is limited evidence of the causal relationship between licenced premises and alcohol-related harm, longitudinal studies and natural experiments suggest that increases in the number of outlets (particularly leading to ‘bunching’ of several premises) lead to increased binge drinking and alcohol-related violence. This evidence, combined with the consistent correlations between outlet density and harm from alcohol, leads most to conclude that reducing availability of alcohol is an effective measure to reduce alcohol harm. The NICE guidance ‘Alcohol-Use Disorders: Preventing Harmful Drinking’ recommends that local authorities identify areas that have high densities of licenced premises and high rate of harm from alcohol, and limit new premises in these areas as highlighted by the cumulative impact zones referenced within this policy.
- 23.12 There is evidence that density of licenced premises is associated with increased risk of domestic abuse in the local area. In areas likely to be experiencing high rates of domestic abuse, such as those with greater levels of economic deprivation, consideration should be given to the potential exacerbation of risk factors that additional licenced premises may entail.
- 23.13 Where any protocols to be agreed with the Police identify a particular need to disperse people from town centres swiftly and safely to avoid concentrations which could lead to disorder and disturbance that may have a negative cumulative effect, the Royal Borough will aim to inform those responsible for providing local transportation so that arrangements can be made to reduce the potential for problems to occur.
- 23.14 The Royal Borough will aim to adopt the best practice described in the Greater London Authority publications: The Mayor’s Violence Against Women and Girls Strategy (2022-25), Approaches to Managing the Night-Time Economy (July 2019) and LGA guidance notes on Drink spiking prevention (Sept 2022). The case studies bring together examples of initiatives and actions driven by councils and their partners which sought to address the issues they have faced locally. Although the issues may differ, the mechanisms for addressing them are likely to be similar and may help Royal Greenwich to strengthen and improve the management of the night-time economy.
- 23.15 The Royal Borough is committed to tackling Violence Against Women and Girls (VAWG) through a range of initiatives, including its dedicated VAWG Strategy. This licensing policy operates within the context of this broader strategic approach, recognising the potential role of licensed premises in either contributing to or mitigating risks associated with VAWG. Licensees are encouraged to be aware of the Royal Borough’s VAWG Strategy and the issues it addresses. Information about the Strategy is available on the Royal Borough’s website via its domestic abuse and VAWG pages, and licensees should note that the Strategy may be subject to review and update.
- 23.16 There are a number of wider issues that may need to be given due consideration when dealing with applications. The Royal Borough’s Licensing Sub-Committee may upon request, or when considered appropriate, receive reports on the:
- Needs of the local tourist economy.
 - Cultural strategy for the area.

- Employment situation in the area and the need for new investment and employment where appropriate.
 - Planning considerations which might affect licenced premises.
 - Crime and disorder issues within the Borough.
 - Sustainability of a greener Greenwich.
- 23.17 The Royal Borough, where appropriate, will attach conditions to premises licences and club premises certificates, so far as possible, to reflect local crime prevention strategies. For example, the provision of CCTV cameras in certain premises. Where appropriate, it should reflect the input of the Safer Greenwich Partnership.
- 23.18 The Royal Borough's Licensing Sub-Committee may also from time to time provide appropriate reports to other Committees and organisations for their consideration.
- 23.19 The Royal Borough is aware that London has been selected for a landmark pilot scheme granting the Mayor new strategic 'call-in' licensing powers, aimed at supporting the city's vital hospitality, leisure, and tourism sectors and the broader night-time economy, while ensuring community safety and wellbeing are maintained. This initiative seeks to explore how these new powers can be used effectively and may lead to future changes or interventions in licensing decisions; the Royal Borough will monitor developments regarding this pilot as the relevant legal framework is defined and its potential implications for local licensing policy become clearer.

24 Night Time Economy Zones in Greenwich & Woolwich

- 24.1 The Royal Borough of Greenwich is committed to supporting the development of vibrant, safe, and well-managed night-time economies (NTE) in its key town centres of Greenwich and Woolwich. This aligns with strategic initiatives such as the Greenwich Town Centre Night-Time Economy Strategy and the Woolwich Enterprise Zone, which aim to enhance local businesses, support cultural activities, and create welcoming environments after dark.
- 24.2 The Royal Borough recognises that Greenwich and Woolwich town centres are designated as Cumulative Impact Zones (CIZs). This designation reflects existing pressures on the licensing objectives, particularly concerning crime, disorder, and public nuisance with Data indicates that while CIZs comprise only a small geographical area of the borough, they are key drivers of alcohol-related offences across the borough, accounting for approximately 30% of the total. This evidence highlights existing pressures on the licensing objectives within these zones, particularly concerning crime and disorder. Consequently, the Licensing Act 2003 framework establishes a rebuttable presumption that applications for new premises licences, or variations to existing licences that could add to the cumulative impact (such as later hours or increased capacity), will be refused within these CIZs.
- 24.3 In practice within Royal Greenwich, the CIZ policy has served primarily as a driver for higher operational standards, as applicants generally recognise the need for robust measures to operate successfully in these areas. The Royal Borough expects this focus on high standards to continue. Therefore, while The Royal Borough remains open to

proposals that genuinely enhance the NTE, the onus remains firmly upon applicants to proactively and comprehensively demonstrate, through their operating schedule, precisely how their specific proposals will not add to the existing cumulative impact, particularly concerning the identified risks.

24.4 To support the NTE ambitions within the CIZ framework, and to address the specific risks identified, the Licensing Authority expects applications to demonstrate high standards of operation and management. Applicants seeking to rebut the presumption of refusal will need to submit comprehensive operating schedules detailing proactive measures designed to uphold the licensing objectives.

- **Guidance and Support:** Potential applicants are encouraged to seek pre-application advice from the Licensing Authority to better understand these expectations. Furthermore, The Royal Borough maintains a list of model conditions (see Appendices) which applicants can draw upon when formulating their operating schedules. Certain model conditions are particularly relevant to mitigating impacts typically associated with NTE premises within CIZ areas and applicants should give these careful consideration. However, these remain illustrative examples, and applicants must tailor their proposed conditions to their specific premises and activities.
- **Expected Measures:** While each application will be judged on its own specific merits, the Licensing Authority would typically expect detailed proposals addressing areas such as (but not limited to):
 - **Operating Hours:** Applicants must provide a clear justification for the proposed hours. Within the CIZ, the granting of hours, particularly later hours, may be subject to specific approaches to manage potential impact:
 - **Phasing:** Permission for the full hours requested may be granted incrementally. For example, the Licensing Authority might initially grant an earlier terminal hour, with the potential for the premises to apply via full variation for later hours after a sustained period (e.g., 12 months) of demonstrating compliant and responsible operation at the earlier time.
 - **Linkage to Enhanced Management:** Requested hours, especially during peak times (e.g., after midnight), may need to be explicitly linked to demonstrable high standards of management specifically implemented during those periods.
 - **Public Safety & Crime Prevention:**
 - High-specification CCTV systems meeting police recommendations (coverage, image quality, data retention).
 - Robust dispersal policies to minimise noise and disturbance as patrons leave.
 - Detailed policies on preventing drug misuse, managing intoxication, and ensuring customer safety.

- **Use of Door Supervisors:** For premises operating after 11:00 PM on weekends for the sale of alcohol for consumption on the premises (or activities posing similar risks), the Royal Borough expects the provision of an appropriate number of SIA-registered door supervisors. This is due to the heightened risk of crime and disorder identified during the late-night weekend period (see CIZ data at **Appendix I**). Applicants not proposing SIA staff during these late-night weekend hours must provide compelling, evidence-based justification and detail robust alternative risk mitigation measures.
- **Counter Terrorism Preparedness:** Site-specific risk assessment, staff training (threat awareness, response), and clear incident procedures (including liaison with emergency services). Please see sections on Counter Terrorism.
- **Preventing Public Nuisance:**
 - Effective noise management plans (insulation, lobbies, limiters, monitoring, management of external areas such as smoking areas and queues).
 - Comprehensive waste management strategies, particularly concerning late-night refuse.
- **Protection of Children and Vulnerable Persons from Harm**
 - Effective age verification policies (e.g. Challenge 25) and recording of refused sales due to age.
 - Staff training on age verification, identifying and assisting vulnerable persons, and conflict management.
 - Policies preventing unsupervised access by children or access to unsuitable areas/times.
 - Implementation of customer welfare initiatives (e.g., Ask for Angela, VAWG/vulnerability training, anti-spiking measures).
 - Clear procedures for managing intoxicated or drug-affected persons, prioritising welfare.
 - Maintenance of comprehensive Incident and Refusals registers.
 - Procedures for assisting vulnerable individuals found on the premises, including liaison with support services.
- **Partnership Working:** Mandatory participation and active engagement in local schemes such as Pubwatch, Business Improvement Districts (BIDs), or other recognised local NTE partnerships.

24.5 Within this framework of high operational standards, the Royal Borough encourages a diverse range of NTE activities, from cultural events to dining and entertainment, that broaden the town centres' appeal. Furthermore, applicants are encouraged to outline commitments to environmental sustainability (e.g., waste reduction, energy efficiency) as part of demonstrating responsible operation.

- 24.6 The Royal Borough values community engagement and feedback on the development of the NTE. All applications will continue to be determined on their individual merits. Relevant representations from residents, businesses, Responsible Authorities, and other interested parties will always be carefully considered by the Licensing Sub-Committee alongside the applicant's proposals and the Royal Borough's policies, including this Statement.

25 Equalities

- 25.1 It is fully recognised that the Equality Act 2010 places a legal obligation on the Royal Borough to have due regard to:
- Eliminate unlawful discrimination, harassment and victimisation, and other conduct prohibited by the Equalities Act 2010.
 - Advance equality of opportunity between people who share protected characteristics and those who do not.
 - Foster good relations between different people who share protected characteristics and those who do not.
- 25.2 The Royal Borough is committed to its duty under the Greenwich Equality Policy (version 2024-2028). The duty ensures all forms of equality and applies in respect of all protected characteristics, which are age, disability, race, gender, religion or belief, sexual orientation, gender reassignment, pregnancy and maternity, and marriage and civil partnership (employment only).
- 25.3 The Royal Borough of Greenwich will ensure the Equality Policy is carried out by:
- Ensuring that equality is fully integrated into mainstream service planning, commissioning, management and delivery.
 - Completing equality impact assessments on all relevant, key decisions.
 - Monitoring services and council employment by equality criteria.
 - Publishing specific and measurable equality objectives.
 - Publishing information showing how we have complied with our legal responsibilities.
 - Providing training and information for our staff to ensure they are aware of the policy and able to apply it when carrying out their duties.
 - Consulting with stakeholders where appropriate.

26 Premises Licence & Club Premises Certificate Annual Fees

- 26.1 Premises Licences and Club Premises Certificates are subject to an annual fee. The amount of the fee is based on the rateable value of the premises and may periodically change if a change to the rateable value results in the premises falling within a new fee band. The annual fee becomes due on the anniversary of the original grant of the licence or certificate, each year, until the licence or certificate lapses, is revoked or surrendered. Legal liability for the annual fee rests with the holder of the licence or certificate at the time the annual fee becomes due.
- 26.2 The Royal Borough, under the Licensing Act 2003, must suspend a premises licence or club premises certificate if the annual fee is not paid when it is due. However, there is a grace period of 21 days if the payment was not made before, or at the time of, the

due date because of an administrative error, or because the holder disputed liability for the fee before, or at the time of, the due date. If the dispute or error is not resolved during the 21-day period, the licence will be suspended.

- 26.3 The Royal Borough, when suspending a licence or certificate, will notify the holder in writing and specify the date on which the suspension takes effect. The date of suspension shall be at least two working days after the day the Royal Borough gives the notice.
- 26.4 Where an annual fee becomes due shortly before a premises licence is transferred, and remains unpaid, the suspension notice shall be served on the current licence holder (the applicant for the transfer, if the transfer has been granted interim effect, or the new holder once the transfer is formally approved) in accordance with section 15.4 of the statutory guidance (updated February 2025). For informational purposes, a copy of the suspension notice may also be sent to the previous licence holder, clearly indicating their responsibility for the outstanding debt.
- 26.5 A suspended premises licence or club premises certificate does not authorise licensable activities and will only be reinstated upon payment of all outstanding annual fees. Suspended licences and certificates may still be subject to hearings, and in the case of premises licences, an application to transfer. Where a transfer application is granted, the holder of the licence at the time the licence was suspended remains legally responsible for any outstanding annual fees and the licensing authority may pursue them for payment. However, in practice, new premises licence holders will likely need to pay to resume licensable activities without delay, as the licence remains inactive until the debt is settled, in accordance with section 15.7 of the statutory guidance.
- 26.6 A suspension ceases to have effect on the day on which the Royal Borough receives cleared payment of the outstanding fee from the licence or certificate holder.

27 Early Morning Restriction Orders (EMROs)

- 27.1 The Royal Borough does not currently operate an EMRO.
- 27.2 The power conferred on licensing authorities to make, vary or revoke an EMRO (or propose to take any of these steps) is set out in Sections 172A to 172E of the Licensing Act 2003. This power came into force on 31st October 2012 and the Government provided guidance as part of the s.182 Guidance to licensing authorities.
- 27.3 This power enables a Licensing Authority to prohibit the sale of alcohol for specified time periods between the hours of midnight and 06:00 hours in the whole or part of its area, if it is satisfied that this would be appropriate for the promotion of the licensing objectives.
- 27.4 EMROs are designed to address recurring problems such as high levels of alcohol-related crime in specific areas at specific times and serious public nuisance, and other instances of alcohol-related anti-social behaviour, which is not directly attributable to specific premises.

27.5 An EMRO:

- Applies to the supply of alcohol authorised by premises licences, club premises certificates and temporary event notices.
- Applies for any period beginning at or after midnight and ending at or before 06:00 hours.
- Does not have to apply on every day of the week and can apply for different time periods on different days of the week.
- Applies for a limited or unlimited period (for example, an EMRO could be introduced for a few weeks to apply to a specific event).
- Applies to the whole or any part of the Licensing Authority's area.
- Will not apply to any premises on New Year's Eve (defined as midnight to 06:00 hours on 1st January every year).
- Will not apply to the supply of alcohol to residents by accommodation providers between midnight and 06:00 hours, provided the alcohol is sold through mini-bars/room service.
- Will not apply to a relaxation of licensing hours by virtue of an order made under Section 172 of the Licensing Act 2003.

27.6 Before the Royal Borough determines to recommend that the Full Council make a proposed EMRO, it should be satisfied that it has sufficient evidence to demonstrate that making the EMRO would be appropriate for the promotion of the licensing objectives. The requirement to take an evidence-based decision to promote the licensing objectives should enable the Royal Borough to draw on experience from other licensing decisions they make under the Licensing Act 2003. The Licensing Authority should consider evidence from partners, including responsible authorities and local community safety partnerships, alongside its own evidence, to determine whether an EMRO would be appropriate for the promotion of the licensing objectives.

27.7 An EMRO is a powerful tool which will prevent licenced premises in the area to which the EMRO relates from supplying alcohol during the time at which the EMRO applies. The Licensing Authority should consider whether other measures may address the problems that they have identified as the basis for introducing an EMRO. These measures might include:

- Introducing a cumulative impact policy.
- Reviewing licences of specific problem premises.
- Encouraging the creation of business-led best practice schemes in the area.
- Use of the new closure power in the Anti-Social Behaviour, Crime and Policing Act 2012. This new closure power can be used to protect victims and communities by quickly closing premises that are causing nuisance or disorder.

27.8 It is the intention of the Royal Borough to support businesses, whilst ensuring the promotion of the licensing objectives. However, where this has deemed to fail then an EMRO could be considered as a possible solution.

28 Late-Night Levy

- 28.1 The Royal Borough of Greenwich does not currently operate a Late-Night Levy.
- 28.2 The Late-Night Levy is a power conferred on licensing authorities by Chapter 2, Part 2 of the Police Reform and Social Responsibility Act 2011. It enables licensing authorities to raise contributions from late-opening alcohol suppliers and late-night refreshment premises to support policing the night-time economy. This is a local power that licensing authorities may choose to exercise. The levy allows local authorities to target specific geographical areas where the night-time economy places demand on policing. Additionally, the Licensing Authority will determine the period during which the levy applies each night, between midnight and 6:00 am, and decide on any exemptions and reductions from a list set out in regulations.
- 28.3 The aim of such a policy is to empower local authorities to charge businesses that supply alcohol late into the night and premises which provide late night refreshment for the extra enforcement costs that the night-time economy generates for Police and licensing authorities.
- 28.4 If a Licensing Authority chooses to introduce the levy in their area, all licenced premises in the geographical area identified by the local authority, which are authorised to supply alcohol and late night refreshment in the levy period will be affected. Premises that do not wish to operate in the levy period will be able to make a minor variation to their licence before the levy is introduced.
- 28.5 So as not to unfairly penalise premises which are not part of the wider night-time economy, licensing authorities have the discretion to offer an exemption from the levy to the following categories of premises and schemes:
- Premises with overnight accommodation.
 - Theatres and cinemas.
 - Bingo halls.
 - Community Amateur Sports Clubs (CASCs).
 - Community premises.
 - Country village pubs.
 - Business Improvement Districts (BIDs).

APPENDICES – MODEL CONDITIONS RE: LICENSING OBJECTIVES

APPENDIX A – PREVENTION OF CRIME AND DISORDER

1. The Licence holder shall install and maintain a comprehensive CCTV system as approved by the Metropolitan Police. All public areas of the licenced premises, including all public entry and exit points and the street environment shall be covered enabling facial identification of every person entering in any light condition. The CCTV system shall continually record whilst the premises is open for licensable activities and during all times when a member of the public is on the premises. All recordings shall be stored for a minimum period of 31 days with date and time stamping. Recordings shall be made available immediately upon the request of Police Officer, Police Community Safety Officer or authorised Local Authority Officer.
2. A staff member from the premises who is conversant with the operation of the CCTV system shall be on the premises at all times when the premises are open to the public and must be able to retrieve recorded footage and show to a Police Officer, Police Community Safety Officer or authorised Local Authority Officer upon request.
3. A personal licence holder shall be on duty and present on the premises at all times when the premises are open to the public for the sale or supply of alcohol.
4. No drinks, whether alcoholic or otherwise, shall be served in glass containers at any time.
5. Reusable polycarbonate/plastic drinks containers shall be used by all persons after (XX.00) hours; all alcoholic and 'soft' drinks shall be decanted by premises staff into such drink containers at the point of sale.
6. All alcoholic drinks sold for consumption off the premises shall be clearly labelled or marked with the name of the premises or the last four digits of the Premises Licence.
7. There shall be no sales of alcohol for consumption off the premises.
8. An Incident Register shall be kept at the premises and made available promptly on request to any Police Officer, Police Community Safety Officer or authorised Local Authority Officer. The Register shall record the following:
 - all crimes reported to the venue
 - removal of all individuals from the premises
 - any complaints received
 - any incidents of disorder
 - all seizures of drugs or offensive weapons
 - any faults in the CCTV system or searching equipment or scanning equipment
 - any refusal of the sale of alcohol
 - any visit by a relevant authority or emergency service
 - any incidents of spiking.

9. All exits doors shall be maintained to be easily operable without the use of a key, card, code or similar means and shall be regularly checked to ensure that they function satisfactorily and a record of the check shall be kept.
10. All sales of alcohol for consumption off the premises shall be in sealed containers only and shall not be consumed on the premises.
11. No customers carrying open or sealed bottles shall be allowed to enter the premises at any time that the premises are open to the public.
12. All outside tables and chairs shall cease to be available for use by patrons from (XX.00) hours each day.
13. All tables and chairs shall be removed from the outside area by (XX.00) hours each day.
14. Notices shall be prominently displayed at all exits requesting patrons to respect the needs of local residents and businesses and to leave the area quietly.
15. Patrons permitted to temporarily leave and then re-enter the premises, e.g. to smoke, shall be limited to (XX) persons at any one time.
16. Notices shall be prominently displayed at any area used for smoking requesting patrons to respect the needs of local residents and use the area quietly.
17. A direct contact telephone number for the manager at the premises shall be publicly available at all times the premises is open and shall also be displayed on the premises website (if applicable). This telephone number is to be made available to residents and businesses in the vicinity.
18. Alcohol shall be covered up by an opaque curtain or blind so that it is not visible to members of the public during non-licensable hours.
19. No beer, lager or cider with an ABV of or above **6.5%** shall be sold at the premises, except for 'premium' product lines pre-agreed in writing with the Police and a ROYAL BOROUGH Licensing Officer in advance of such product being stocked. Copies of the written permission issued for the agreed 'premium' lines shall be kept at the premises and made available on request to the Police and other Officers of responsible authorities.
20. No single cans or bottles of beer, lager or cider shall be sold or supplied at the premises.
21. No more than 20% of the sales area of the premises shall be used at any one time for the sale, exposure for sale, or display of alcohol.
22. There shall be no self-service of spirits on the premises.
23. Prominent signage indicating the permitted hours for the sale of alcohol shall be displayed so as to be visible to customers before entering the premises, where alcohol is on public display, and at the point of sale.

24. The number of persons permitted in the premises at any one time (including staff) shall not exceed (X) persons.
25. The supply of alcohol at the premises shall only be to a person seated taking a table meal and for consumption as ancillary to their meal.
26. The supply of alcohol shall be by waiter or waitress service only.
27. Alcohol may be supplied and consumed by customers prior to their meal in the designated bar area, by up to a maximum at any one time of (XX) persons dining at the premises.
28. Substantial food and non-intoxicating beverages, including drinking water, shall be available in all parts of the premises where alcohol is sold or supplied for consumption on the premises.
29. No entertainment, performance, service, or exhibition involving nudity or sexual stimulation which would come within the definition of a sex establishment in Schedule 3 to the Local Government (Miscellaneous Provisions) Act 1982 as amended by the Greater London Council (General Powers) Act 1986 (whether or not locally adopted), shall be provided.
30. There shall be no striptease or nudity, and all persons shall be decently dressed at all times.
31. A written Code of Conduct for staff participating in the provision of striptease or nudity shall be in place, and shall be kept on the premises for inspection by Police or authorised Council officers at all times the premises are open to the public. Management shall ensure all staff are aware of the Code of Conduct and shall take all reasonable steps to ensure it is adhered to.
32. In relation to the specified Function Room there shall be no admission after (midnight) other than to
 - residents of the hotel and their bona fide guests (up to a maximum of four); or
 - persons attending the pre-booked function
33. All functions in the specified Function Room shall be pre-booked or ticketed events
34. Clear and prominent notices shall be displayed on the premises warning customers of the need to guard their property and to be aware of the operation of pickpockets, bag snatchers, etc. The notices shall advise customers to report concerns to the designated premises supervisor or the person in charge of the licensed premises.
35. Patrons permitted to temporarily leave and then re-enter the premises shall not be permitted to take any drinks or containers with them.

36. The use of the garden/outside area shall cease after *(insert time)* hours on *(insert days of the week)*.
37. Prior to any "designated sporting event" (as defined in the Sporting Events Control of Alcohol etc. Act 1985) the premises licence holder shall ensure that;
- Alcohol sales in respect of cans of beer or cider are limited to no more than 4 cans per person during the preceding four hours before the commencement of the relevant designated sporting event;
 - No sales of alcohol in bottles or glass containers shall be made in the period four hours of before the commencement of the designated sporting event;
 - Alcohol sales shall cease for a period of one hour immediately before the commencement of the relevant designated sporting event;
 - On any day when there is a relevant designated sporting event taking place, the premises shall not advertise or promote the availability of beer or cider within the locality to attract persons to the premises;
 - All members of staff working at the premises shall be informed of this condition prior to taking up employment;
 - On the day of the relevant designated sporting event, upon the direction of a Police Officer, using the grounds of the prevention of crime and disorder or public safety, the premises shall immediately cease to sell alcohol until further directed by the Police or until the relevant designated sporting event has finished.
38. As soon as possible, and in any event within 1 month from the grant of the Premises Licence, the Premises Licence holder shall join the local Pubwatch or other local crime reduction scheme approved by the Police.
39. Queuing outside the premises shall be restricted to a specified designated location. The queueing area shall be enclosed within appropriate barriers to ensure that the footway is kept clear and unobstructed. The Premises Licence holder shall ensure that the queue is orderly and supervised by SIA-registered door staff to ensure that there is no public nuisance or obstruction to the public highway.
40. The premises shall only operate as a restaurant in which:
- customers are shown to their table;
 - provides food in the form of substantial table meals that are prepared on the premises and are served and consumed at the table using non-disposable crockery;
 - does not provide any take away service of food or drink for immediate consumption; and
 - alcohol shall not be sold or supplied to, or consumed on, the premises otherwise than by persons who are bona fide taking substantial table meals and provided always that the consumption of alcohol by such persons shall be ancillary to taking such meals.
41. All external fire exit doors shall be fitted with sensor alarms and visible indicators to alert staff when the doors have been opened.

42. Reusable polycarbonate drink-ware or non-glass reusable or biodegradable containers shall be used by all persons after (XX.00) hours; all alcoholic and non-alcoholic drinks shall be decanted by premises staff into such drinks containers at the point of sale.
43. The Premises Licence holder shall have a written protocol in place manage intoxicated patrons and/or persons under the influence of illegal drugs. The protocol must also include procedures relating to the supply of illegal drugs and the 'spiking' of drinks.
44. Where rooms at the premises are let to individuals or groups for private hire, a hire agreement shall be in place that includes the conditions on the Premises Licence and clearly states the responsibilities of the hirer to ensure compliance with the conditions.
45. Where the premises are let to individuals or groups for private hire, a named person shall be responsible for ensuring that conditions on the Premises Licence are complied with. The named person shall provide his/her details to the Premises Licence holder in writing in advance of the event and their details shall be retained for a period of at least thirty-one days after the date of the event.
46. A written Security Policy shall be made available for inspection at all times on the premises. The Policy shall identify requirements such as:
 - a) The minimum number of supervisors
 - b) The displaying of name badges
 - c) The carrying of proof of SIA registration
 - d) The hours of operation and location of door staff
 - e) Whether at least one female supervisor should be available
 - f) Time arrived at and left the premises
47. A minimum of (X) SIA licensed door supervisors, at least one of whom shall be a female, shall be on duty at the premises at all times whilst it is open to members of the public.
48. A minimum of (X) SIA licensed door supervisors, at least one of whom shall be a female, shall be on duty from or during certain defined hours on a risk-assessed basis. A copy of the risk assessment shall be made available to Police or authorised officers of the local authority (as defined by Section 13 of the Licensing Act 2003) on demand.
49. At least (2) SIA licensed door supervisors shall be on duty at the entrance of the premises at all times whilst it is open to members of the public.
50. A written Search Policy to prevent customers or staff bringing illegal drugs, weapons or other illegal items onto the premises at any time shall be in place and operate at the premises and shall be available for inspection by any Police Officer, Police Community Support Officer or authorised Local Authority Officer on request.
51. All persons entering or re-entering the premises shall be searched by an SIA trained member of staff in accordance with the premises written search policy. This may be by means of passing through a metal detecting search arch or wand or being physically searched in accordance with a procedure agreed with the Metropolitan Police, including a 'pat down search' and a full bag search, and monitored by the premises CCTV system.

52. All staff engaged outside the entrance to the premises, or supervising or controlling queues, shall wear high visibility yellow jackets or vests with their identification badges clearly visible.
53. “Clickers” or other devices shall be used by door staff to monitor the number of persons present on the premises at any one time.
54. A written Drugs Policy that details how the Premises Licence holder will prevent customers or staff bringing illegal drugs into the premises and procedures for dealing with any drugs found either on customers or within the premises shall be implemented at the premises.
55. There shall be a lockable 'Drugs Box' at the premises, access to which shall be restricted to (Police, Police and DPS) only. All controlled drugs (or items suspected to be or to contain controlled drugs) found at the premises shall be placed in this box as soon as practicable. Whenever this box is emptied, all contents must be removed by the Metropolitan Police for disposal.
56. Prominent signage stating that the premises operates a drugs policy and that an amnesty box is available shall be displayed prominently at all entrances.
57. There shall be no admittance or re-admittance of customers to the premises after (XX.00) hours.
58. An attendant shall be on duty in the cloakrooms during the whole time that it is in use.
59. The premises shall prominently display signage at all entrances informing customers that:
 - All persons entering these premises shall be searched. Agreement to search is a condition of entry. If persons do not consent, entry shall be refused. Police may be called if drugs or weapons are found.
 - CCTV is in operation throughout this premises and is made available to the Police
 - Any person found carrying weapons or illegal drugs shall be permanently excluded and the Police will be informed
 - Management reserve the right to refuse entry
60. A currently qualified first aider shall be employed on the premises at all times that the premises are open to the public. The venue shall provide sufficient first aid facilities commensurate with the type of event and capacity of the premises.
61. The premises shall install and maintain a computer-based identification entry system. The details of all persons, including staff are to be passed through the system prior to being permitted entry to the premises. The provision and maintenance of such equipment shall be to the reasonable satisfaction of Metropolitan Police Service. The details of persons recorded by the system shall be made available to Police upon reasonable request for the purpose of preventing and detecting crime. The data retained shall be managed in accordance with the General Data Protection Regulations and the Data Protection Act 2018 or any re-enactment thereof

62. The Premises Licence holder shall employ SIA registered security personnel for all events. External promoters shall not be permitted to use their own security personnel.
63. The Premises Licence holder shall employ SIA registered security personnel provided by an operator that is part of the SIA's Approved Contractor Scheme.
64. A register of security personnel employed on the premises shall be maintained in a legible format and made available to Police upon reasonable request. The register should be completed by the DPS/duty manager/ nominated staff member at the commencement of work by each member of security staff and details recorded should include;
- Full name;
 - SIA badge number; and
 - time duties commenced and ceased.
- The security operative shall sign their name against these details.
65. At the commencement of work security personnel should ensure that they are recorded on the CCTV system and that a clear head and shoulders image showing their face clear of any hat, non-glass reusable or biodegradable containers or other obstruction is recorded.
66. 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. The Dispersal Policy shall be available to be inspected by any Police Officer, Police Community Support Officer or authorised Local Authority Officer upon request.
67. The licence holder shall maintain a Register of all employees, including relatives, working at the premises. The register shall be made available upon demand to a Police officer, an immigration officer, or an authorised officer of the Licensing Authority.
68. The Register of Employees shall record the following information for each employee:
- a. Full name of employee;
 - b. A copy of the Passport photograph page or National Identity Card photograph;
 - c. Date employment commenced;
 - d. Date employment ended;
 - e. Eligibility to work in the UK by inspection of passport and originals of the right to work in the UK documents;
 - f. Evidence of the right to work in the UK;
 - g. Signature of the Premises Licence Holder to confirm the documents inspected and date of inspection;
 - h. Signature of employee to confirm documents inspected by the licence holder and date of inspection
 - i. The employee's residential address.
69. The premises licence holder will monitor its primary use through a methodology and collection of monthly data (such as transactional or footfall data) agreed with the Licensing Authority. Where this data shows that primary use of the premises is that of

a garage, the sale of alcohol shall be immediately suspended until such time that the data suggests primary use is no longer that of a garage. At least six months of data will be retained and made available for inspection by the Licensing Authority on request.

70. All staff must receive training on the prevention and identification of spiking, as well as the actions required in such cases. A log of the training shall be maintained and made available immediately on request to the police and any authorised officer under the Licensing Act 2003, as defined under Section 13 of the Licensing Act 2003.
71. Notices shall be prominently displayed on the premises that spiking will not be tolerated.
72. All staff shall receive customer welfare and vulnerability training from an appropriately qualified trainer. The details of such training (e.g., 'WAVE', 'Ask for Angela', Anti-Spiking Initiative or similar) must be documented and immediately presented upon request to the police and authorised officers under the Licensing Act 2003. Furthermore, the premises licence holder, or their representative, shall sign up to the Royal Borough of Greenwich Women's Charter, or an equivalent initiative, and prominently display the certification at the premises.
73. Policies and procedures shall be implemented to enhance the premises' preparedness for and resilience against a terrorist attack. These policies and procedures must align with NaCTSO Venues and Public Spaces (VaPS) guidance and appropriate resources within the suite of ACT products. These procedures shall be made immediately available upon request to the police and authorised officers from the local authority, as defined under Section 13 of the Licensing Act 2003.
74. Planned rehearsals of terrorist attack response plans shall be conducted annually to evaluate the overall preparedness and effectiveness of the policies. A log of these rehearsals shall be maintained and made immediately available upon request to the police and authorised officers from the local authority, as defined under Section 13 of the Licensing Act 2003.
75. Counter Terrorism Policies and Procedures must be tested and reviewed every 12 months. A log of these policy reviews shall be maintained and made immediately available upon request to the police and authorised officers from the local authority, as defined under Section 13 of the Licensing Act 2003.
76. The Premises Licence Holder shall actively engage with freely available counter terrorism advice and guidance provided by Counter Terrorism Protect Officers, Counter Terrorism Security Advisors and Royal Greenwich Senior Community Safety Specialist Prevent and Protective Security Officers.
77. All customer-facing staff, including those involved in the sale or supply of alcohol, must complete the Action Counters Terrorism (ACT) Awareness eLearning prior to the commencement of the Festival Event. This training is available at <https://www.gov.uk/government/news/act-awareness-elearning> or <https://www.protectuk.police.uk/group/84>.

APPENDICES – MODEL CONDITIONS RE: LICENSING OBJECTIVES

APPENDIX B – PUBLIC SAFETY

When applicants for premises licences or club premises certificates are preparing their operating schedules and the Royal Greenwich and other Responsible Authorities are considering such applications, the following options should be considered as measures to promote public safety. These options should also be considered following the receipt of relevant representations from a Responsible Authority or any other persons.

Escape routes

To achieve the public safety objective, it may be necessary to include conditions relating to the maintenance of all escape routes and exits, including external exits. This can be ensured by keeping all exits unobstructed and in good order of repair. The exits shall comply with the Building Regulations in force at the time of construction. All floor surfaces shall be even and constructed of non-slippery materials. The surfaces shall be free of slip and trip hazards or floor contamination. If any floor contamination is identified, it must be clearly marked while it is being removed. In restaurants and other premises, where chairs and tables are provided, this will also include ensuring that the gangways are kept unobstructed.

Consideration shall be given to the following matters listed below:

- All emergency exit doors shall be easily opened without the use of a key, card, code or similar means;
- Doors at such exits shall be regularly checked and maintained to ensure that they function satisfactorily. A written record of these checks shall be kept at the premises at all times and made available for inspection by any authorised officers;
- Any removable security fastenings should be removed whenever the premises are open to the public or occupied by staff;
- Where necessary the edges of the treads of steps and stairways should be conspicuous from the rest of the stair treads;
- Where an inward opening door or shutter is permitted on an escape route and is required to be kept open, a sign shall be provided on this door or the shutter. The sign shall state the following: **“Secure door/shutter must be kept open when the premises are occupied”** in lettering of 5mm minimum height (Circular sign, colour blue with white text).

Safety Checks

Consideration shall be given to the conditions to ensure that:

- The safety checks are carried out before admitting the public; and
- Details of such checks are recorded, accessible and can be made available to relevant Council’s officer on request.

Evidence of Maintenance

Consideration shall be given to the conditions to ensure that:

- The safety of equipment and installations at the premises must not pose any risk to any persons at the premises. This can be proven by the presence of certification for any permanent or temporary electrical supply, emergency lighting, or emergency warning system.

Flame Retardant Materials

Consideration shall be given to the conditions to ensure that:

- The hangings, curtains and temporary decorations are flame-retardant and are maintained in this condition;
- All seating and furnishings, including the upholstered seating and bean bags, pass the appropriate testing criteria.

Capacity limits

Consideration shall be given to conditions to ensure that the following arrangements listed below are made:

- That any capacity limit imposed under the premises licence or club premises certificate is not exceeded; and
- That any capacity limit detailed in the premises' Fire Risk Assessment is not exceeded; and
- That the licence holder, a club official, any manager or a designated premise supervisor is aware of the number of people present at the premises at any given time and can provide this information to any authorised person on request.

Emergency action notices

Consideration shall be given to conditions ensuring that notices and signage detailing the actions to be taken in the event of emergencies, including how the emergency services should be summoned, are prominently displayed inside the premises and protected from damage and deterioration.

Access for emergency vehicles

Access for emergency vehicles must be always kept clear and free from obstructions.

First Aid

Consideration shall be given to conditions to ensure:

- Adequate and appropriate supply of first aid equipment and materials;
- A sufficient number of suitably trained and competent first aiders, as identified in the premises' First Aid needs risk assessment. The duties of all first aiders shall be clearly defined.

Consideration may be given to conditions to ensure that:

- In the absence of adequate daylight, the lighting in any area accessible to the public, members or guests shall be fully operational at all times;

- Emergency lighting installation has not been altered;
- Emergency lighting and signage are in good working order before the admission of the public, members or guests; and
- In the event of the failure of standard lighting, where the emergency lighting battery has a capacity of one hour, arrangements are in place to ensure that the public, members or guests can leave the premises within 20 minutes unless within that time standard lighting has been restored and the battery is being re-charged. If the emergency lighting battery has a capacity of three hours, the appropriate period by the end of which the public should have left the premises is one hour.

Temporary electrical installation

Consideration should be given to the safety of the public at all licensed premises by ensuring that:

- Temporary electrical wiring and distribution systems are installed and regularly inspected by a competent person;
- These systems comply with the appropriate legal requirements;
- All temporary electrical wiring and distribution systems are inspected and certified by a competent person prior to use.

Indoor sports entertainment

Subject to the type of sports provided and the appropriate risk assessments supplied by the premises license holder, consideration shall be given to conditions to ensure that:

- A suitably qualified medical practitioner is present throughout a sports entertainment event, involving boxing, wrestling, judo, karate or other contact sports entertainment;
- Where a ring is used, it is constructed of and supported by suitable materials. A competent person must inspect the ring at prescribed intervals. Any material used for the construction of the skirt around the ring is flame-retardant;
- During any wrestling or other type of similar entertainment the nearest seating that members of the public must be further than 2.5 meters away from the edge of the ring; and
- Where water sports entertainment is provided, staff adequately trained in rescue and life safety procedures shall be stationed at and remain within the vicinity of the water at all material times (see also Managing Health and Safety in Swimming Pools issued jointly by the Health and Safety Executive and Sport England).

Special effects

The use of special effects in venues of various types may present significant risks. Any special effects or mechanical installations should be arranged and stored to minimise any risk to the safety of the audience, the performers and staff. Special effects to be considered include:

- Dry ice machines and cryogenic fog;
- Smoke machines and fog generators;

- Pyrotechnics, including fireworks;
- Real flames;
- Firearms;
- Motor vehicles;
- Strobe lighting;
- Lasers;
- Explosives and highly flammable substances.

In certain circumstances, it may be necessary to require that certain special effects are only used with the prior notification to, and the approval of the appropriate authority.

Theatres, cinemas, concert halls and similar places-

In the context of public safety, there are matters that need to be considered in theatres and cinemas. The conditions must be appropriate, relevant and established through risk assessment and evaluation process. The establishments should avoid using standardised conditions and should consider the below listed points:

- There must be a sufficient number of attendants employed. Consideration should be given to other safety measures, such as the design of the premises and the profile of the audience (e.g. performances attracting primarily children). Attendants should be evenly distributed throughout all parts of the premises to which the public have access, so they can observe the entire premise.
- Standing and sitting in gangways, in front of any exits, on staircases and landings should not be permitted, except for accessing the seat(s) only;
- Standing to view the performance except in areas designated in the premises licence or club premises certificate;
- All drinks can only be consumed out of containers made of paper or non-glass reusable or biodegradable materials;
- No flammable films to be allowed at the premises without the prior approval of the Fire Brigade.

Public Safety Model Conditions

1. The number of persons permitted in the premises at any time (including staff) shall not exceed (x) persons.
2. The occupancy shall be restricted to (insert number) persons in the premises. (Limits may also be appropriate for different rooms or floors of premises). The total occupancy figure includes staff, performers and public. The premises licence holder shall ensure that there are appropriate management controls to ensure that the occupancy figure is not exceeded at any time. Appropriate controls shall be put in place to ensure that the occupancy numbers of the premises/specified areas are not exceeded at any time.
3. Adequate procedures must be implemented to ensure that overcrowding, such as that which may cause injury through crushing, does not occur in any part of the premises at any given time.

4. The licence holder shall determine the occupant capacity of the premises based on the recorded Risk Assessment(s).
5. The Risk Assessments must take into account all relevant factors including the type and nature of the event, space, audience density, means of access and egress, toilet provision, load bearing capacity of floors, ventilation. etc. Risk Assessments must be reviewed regularly, and especially if any circumstances change.
6. Where necessary separate occupancy levels must be set for the different parts of the premises, and when necessary for different premises' layouts and different types of events.
7. Measures must be put in place to ensure that the capacity is not exceeded at any time. These measures should be documented.
8. All documentation relating to the proposed capacity limit of the numbers of persons at the premises, must be kept at the premises and must be available for sighting to any authorised officer of the Royal Borough or the Police.
9. The premises' licence holder shall regularly review, update and amend all Risk Assessments, particularly following any changes to the layout or operation of the venue. Such reviews should be fully documented and form an integral part of the risk assessment.
10. Manual (and/or automatic) electronic number control systems shall be installed, used and maintained at the premises always when the premises are open to the public.
11. Any special effects or mechanical installations shall be arranged and stored to minimise any risk to the safety of those using the premises. Where there is no previous consent The following special effects listed below are subject to 10 days prior notice being provided to the Licensing Authority for approval:
 - Dry ice and cryogenic fog;
 - Smoke machines and fog generators;
 - Pyrotechnics, including fireworks;
 - Firearms.
12. The approved arrangements at the premises, including means of escape provisions, emergency warning equipment, the electrical installation and mechanical equipment, shall at all material times be maintained in good condition and full working order.
13. The routes of escape from the premises need to be maintained unobstructed and free from slip and trip hazards. They must be immediately available and clearly identified in accordance with the premises layout plans provided.
14. All emergency exit doors shall be accessible and unobstructed at all material times without the use of a key, code, card or similar means.

15. All emergency doors shall be maintained effectively, be self-closing and not held open other than by an approved device.
16. The edges of steps and stairways shall be maintained in good order and be conspicuous.
17. Curtains and hangings shall not obstruct emergency safety signs or emergency equipment.
18. All fabrics, curtains, drapes and similar features, including materials used in finishing and furnishing shall either be non-combustible or be durably or inherently flame retardant fabric. Any fabrics used in escape routes (other than foyers), entertainment areas or function rooms, shall be made out of non-combustible fabrics.
19. The certificates of any permanent or temporary features listed below shall be submitted to the Licensing Authority upon a written request:
 - Emergency lighting battery or system;
 - Electrical installation;
 - Emergency warning system;
20. The licence shall have no effect until the capacity of the premises has been assessed and agreed upon by relevant Responsible Authorities.
21. The licence will come into effect after a Fire Risk Assessment has been undertaken and implemented.
22. The number of persons accommodated at the premises (excluding staff) shall not exceed (insert number). The numbers and types of sanitary conveniences should be agreed between the Licensing Team, Responsible Authority and the licence holder.
22. An appropriately qualified medical practitioner shall be present throughout sports entertainment events, such as boxing, wrestling, judo, karate or other sports entertainment of a similar nature.
23. Any ring constructed for boxing, wrestling or a similar contact sport shall be constructed, maintained and inspected by a competent person.
24. At any boxing, wrestling or sports entertainment of a similar nature, members of the public shall not occupy any seat within 2.5 metres of the edge of the ring.
25. At water sports entertainment, an appropriate number of staff adequately trained in rescue and lifesaving procedures shall be stationed and remain near the water body at all material times.
26. Policies and procedures shall be implemented to enhance the premises' preparedness for and resilience against a terrorist attack. These policies and procedures must align with NaCTSO Venues and Public Spaces (VaPS) guidance and appropriate resources within the suite of ACT products. These procedures shall be made immediately available

upon request to the police and authorised officers from the local authority, as defined under Section 13 of the Licensing Act 2003.

27. Planned rehearsals of terrorism attack response plans shall be conducted annually to evaluate the overall preparedness and effectiveness of the policies. A log of these rehearsals shall be maintained and made immediately available upon request to the police and authorised officers from the local authority, as defined under Section 13 of the Licensing Act 2003.
28. Counter Terrorism Policies and Procedures must be tested and reviewed every 12 months. A log of these policy reviews shall be maintained and made immediately available upon request to the police and authorised officers from the local authority, as defined under Section 13 of the Licensing Act 2003.
29. The Premises Licence Holder shall actively engage with freely available counter terrorism advice and guidance provided by Counter Terrorism Protect Officers and Counter Terrorism Security Advisors.
30. All customer-facing staff, including those involved in the sale or supply of alcohol, must complete the Action Counters Terrorism (ACT) Awareness eLearning prior to the commencement of operation. This training is available at <https://www.gov.uk/government/news/act-awareness-elearning> or <https://www.protectuk.police.uk/group/84>.

APPENDICES – MODEL CONDITIONS RE: LICENSING OBJECTIVES

APPENDIX C – PREVENTION OF PUBLIC NUISANCE

The following conditions should be considered to adhere to the Prevention of Public Nuisance licensing objective. This list is not exhaustive, and measures should be taken individually and dependent on the needs and requirements of each premises, location, staff and clientele. The following conditions may be added as conditions on the licence by the Royal Borough of Greenwich if deemed necessary for the promotion of the licensing objective:

1. Notices shall be prominently displayed at all exits, requesting the public to respect the needs of residents and to leave the premises and the area quietly.
2. External doors and windows to the premises shall be kept closed whilst regulated entertainment is taking place, except for access & egress.
3. A noise limiting device shall be installed for all music systems within the premises. The noise limiting device shall be calibrated by an independent qualified acoustic consultant to ensure inaudibility in all nearby noise-sensitive premises (if access to such premises is possible) or, alternatively, at the façade of nearby noise-sensitive premises, and a certificate of compliance shall be submitted to the Royal Borough of Greenwich Environmental Health Pollution team. The device shall be controlled by the premises licence holder and maintained in a locked, tamper-proof box.
4. Music shall not be permitted to be played outside the premises and any music played from within should be inaudible at the facade of the nearest noise-sensitive premises.
5. All speakers should be suitably isolated from the premises' structure by means of isolation/acoustic mounts. Speakers should face away from all entrances and exits.
6. A scheme of sound insulation between the proposed licenced premises and existing residential shall be submitted to, and approved by, the Royal Borough of Greenwich Environmental Health Pollution team. The approved scheme shall be installed prior to any licensable activities taking place and retained for the duration of the licence.
7. An acoustic lobby shall be provided inside all entrances and it should be of such a size as to ensure that the lobby door and entrance door need not be opened at the same time to permit access and egress.
8. The premises licence holder shall arrange for regular checks to be made outside the premises to ensure that noise from inside, or from its patrons, is not adversely affecting neighbouring residential properties. A log of these checks shall be maintained by the premises licence holder or a duly appointed person and produced to the Police and/or an officer of the local authority on demand.
9. Amplified music and voices shall be inaudible one metre from the façade of all noise-sensitive premises.

10. There shall be no admittance or re-admittance to the premises after XX:XX hours.

External Areas

11. All outside tables & chairs shall be removed, or rendered unusable for customer use, by XX:XX hours each day.
12. Patrons permitted to temporarily leave & re-enter the premises shall be limited to (XX) persons at any one time.
13. Patrons permitted to temporarily leave and then re-enter the premises shall not be permitted to take drinks or drinks containers outside with them.
14. Patrons shall not be permitted to take drinks or drinks containers outside after XX:XX hours.
15. Patrons shall not be permitted to take drinks or drinks containers outside of the premises at any time.

APPENDICES – MODEL CONDITIONS RE: LICENSING OBJECTIVES

APPENDIX D – PROTECTION OF CHILDREN FROM HARM

The following conditions should be considered in order to adhere to the Protection of Children from Harm licensing objective. (This list is not exhaustive and measures should be taken individually and dependent on the needs and requirements of each premise, location, staff and clientele). The following conditions may be added as conditions on the licence by the Royal Borough of Greenwich if deemed necessary to for the promotion of the licensing objective:

1. The Challenge 25/Think 25 or contemporary equivalent proof of age scheme shall be operated at the premises. All customers who appear under the age of 25 will be challenged to prove that they are over 18 when attempting to purchase alcohol. Acceptable forms of ID include a photo driving licence, passport, or home office approved identity card bearing the holographic 'PASS' mark. If the person seeking alcohol is unable to produce an acceptable form of identification, no sale or supply of alcohol shall be made to or for that person.
2. All staff shall be trained in the law about the sale of alcohol. Such training will include challenging every individual who appears to be under 25 years of age and to refuse service where individuals cannot produce acceptable means of identification, acceptable forms of ID and using the refusal register. Such training (including any refresher training) will be logged and provided not less than every twelve/six/three months. The training log shall be made available for inspection by Police and "authorised persons" immediately upon request.
3. A refusals log shall be kept at the premises, and made immediately available on request to the Police or an "authorised person". The refusals log is to be inspected on a monthly basis by the DPS and noted in the log; and a record made in the log of any actions that appear to be needed to protect young people from harm. The log must record all refused sales of alcohol and include the following:
 - a. the identity of the member of staff who refused the sale;
 - b. the date and time of the refusal;
 - c. the alcohol requested and reason for refusal; and
 - d. description of the person refused alcohol.
4. The following posters, or contemporary equivalent shall be displayed conspicuously on the premises in customer facing areas:
 - a. 'Think 25' to advise potential purchasers that suitable proof of age will be required for all purchasers who appear to be under 25.
 - b. 'It's A Crime' intended to warn adults not to buy alcohol for those under 18 years-of-age.
 - c. Any updated and relevant posters which highlight child protection and safeguarding measures as given by Police and "authorised persons".
5. All staff shall be trained in Child Protection Awareness. Such training will include awareness around Neglect, Emotional & Physical Abuse, Child Criminal Exploitation and

Child Sexual Exploitation as well as using the Safeguarding Log. Such training (including any refresher training) will be logged and provided not less than every (twelve/six/three) months. The training log shall be made available for inspection by Police and “authorised persons” immediately upon request.

6. A Safeguarding Log, or Safeguarding Section within the incident book, shall be kept at the premises, and made immediately available on request to the Police or an "authorised person". The safeguarding log will be inspected on a monthly/quarterly/annual basis by the DPS and noted in the log; and a record made in the log of any actions that are required to protect young people from harm. The log must record all concerns raised with regards to safeguarding and include the following:
 - a. the identity of the member of staff who raised the concern;
 - b. description of the concern raised including details relating to the young person; and
 - c. the action, and justification for such action, undertaken by the member of staff when the concern was raised. Where no action is undertaken, a justification for this shall be required.
7. The following posters, or those of a similar nature, shall be displayed conspicuously on the premises in customer facing areas:
 - a. ‘Neglect Matters’ or similar poster to raise awareness of neglect with staff and customers; ‘Operation Makesafe’, or similar poster intended to advise of the action to be taken if someone should spot signs of CSE; and
 - b. Any updated and relevant posters which highlight child protection and safeguarding measures as given by Police and “authorised persons”.
8. All staff that may come into regular contact with children and young people shall be subject to a DBS (or equivalent) check.
9. There shall be a Safeguarding Lead for the site and all staff shall report concerns around safeguarding to the designated person in addition to recording in the safeguarding log.
10. There shall be no unaccompanied children permitted on the premises at times they are open to the public after (20:00) hours other than for private hire events arranged under a signed private hire agreement.
11. Unaccompanied minors entering the premises after (20:00) hours shall be treated as a safeguarding matter, provided with assistance as necessary and a full written record of the incident, including dates and times of the minor’s arrival, stay and departure shall be maintained within the incident book for the premises with copies of CCTV retained. Records of incidents and corresponding CCTV shall be made available for inspection by Police and “authorised persons” immediately upon request.

APPENDICES – MODEL CONDITIONS RE: LICENSING OBJECTIVES

APPENDIX E – OUTDOOR EVENTS (CRIME AND DISORDER)

Security, Surveillance & Incident Response:

1. Professional security personnel trained in crowd management, conflict resolution, and emergency response protocols to maintain a secure environment shall be employed and present throughout the duration of the event. There shall be a minimum of xxx SIA licensed security officers employed for the duration of the event, and at least xxx additional stewards.
2. Body worn video cameras shall be worn by SIA staff holding key positions including Search, Response, Eviction, Perimeter, as well as the Supervisory team. When SIA Security staff are deployed the event organiser shall ensure that records are kept by the Designated Premises Supervisor (DPS), at the event site, of the following details of any door-supervisor employed at the premises: Name and date of birth, full 16-digit SIA badge number and dates and times employed. These records must be made available, in useable form, to the Metropolitan Police, Greenwich Council officers or authorised officers of the Security Industry Authority upon request.
3. CCTV cameras shall be deployed strategically across the event grounds to monitor crowd behaviour, deter criminal behaviour, and provide evidence in the event of any criminal activity or disorderly conduct.
4. The CCTV unit shall be deployed from xxx hours on both days of the event, until midnight. All recordings made by the CCTV system shall be retained and stored in a suitable and secure manner for a minimum of 31 days and shall be made available on request to the Metropolitan Police, the Licensing Authority or other Responsible Authorities. A minimum of one member of staff on duty will be able to operate the CCTV system.
5. SIA Security staff wearing Body Worn Video Cameras (BWVC) shall begin recording should there be any incidents of Crime and Disorder, or if they deem it appropriate when an incident occurs. In the event that body worn cameras are switched on, these will only be turned off once the incident has been defused and brought under control. All recordings shall be stored securely for a minimum period of 31 days with date and time stamping. Viewing of recordings shall be made available immediately upon demand by the Metropolitan Police or an authorised officer of the Licensing Authority.
6. The event will operate a “zero-tolerance policy” towards any forms of antisocial behaviour, illegal drug use, violence, or vandalism. Security staff shall be authorised to remove any individuals found engaging in such activities, from the premises. In the event of any criminal behaviour occurring, all perpetrators shall be detained until the police arrive.

7. An incident log shall be kept at the premises and made available on request to an authorised Local Authority or Police Officer, which 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. (e) All seizure of drugs or offensive weapons; (f) Any refusal of the sale of alcohol; (g) Any visit by a relevant authority or emergency service.
8. Clearly marked and signage for emergency contact points shall be stationed across the site for attendees to report issues.
9. The Premises License Holder shall operate an admission search policy for all staff, artists, promoters and entourage. The search will operate a 3-stage process: Passive Drug Detection Dogs (minimum of 2 K9), Wand Metal Detector, Visual & Physical Search (hands on). All bags will be searched and all those entering will pass through the metal detector and/or wands search area.
10. Security personnel will remain on-site overnight to protect equipment, vendor stalls, and site security during the two-day event.
11. A secure and robust accreditation system must be in place for VIP's, guest list, artists, staff/ crew. Backstage areas, access onto stages, back of house and non-public areas must be controlled at all times by security who must maintain the accreditation system.

Search Policy & Drug Control

12. Random bag checks and metal detectors will be used at all entry points to prevent prohibited items from entering the site.
13. Strategically placed amnesty bins will allow attendees to safely dispose of prohibited items without facing consequences prior to entry to the event.
14. A weapons sweep must be conducted of the event site following completion of the event build up but prior to the event opening to the public. Regular weapon sweeps shall be carried out of the event site and shall be recorded in the Security and Incident log.
15. All attendees to the event will be subject to search. The search will operate a 3-stage process: Passive Drug Detection Dogs (minimum of 2 K9), Wand Metal Detector, Visual & Physical Search (hands on). All bags will be searched on entry. Searches will be carried out by SIA Registered staff of the same sex.
16. A clear visible notice shall be placed at the entrances to the premises advising those attending, that it is a condition of entry that all customers agree to being searched and the Metropolitan Police will be informed of anyone who is found in possession of a controlled substance or weapons. Anyone found with illegal drugs or controlled substances will be refused entry, and the Metropolitan Police will be informed immediately.

17. Anyone found with an offensive weapon will be ejected/refused entry to the event, detained by SIA security staff, the Metropolitan Police informed immediately, and the attendee detained until police arrival. The Premises Licence Holder shall be responsible for the implementation and operation of a weapons policy in conjunction with search and seizure. Any amendments to the policy must be agreed in writing with South East Police Licensing Team 14 days prior to any event.
18. The Premises Licence Holder will operate an anti-drugs policy in conjunction with a search and seizure policy in compliance with agreed memorandum of understanding with the Metropolitan Police. This will also include storage and disposal procedures. Signage will be displayed throughout the premises. Any amendments to the policy must be agreed in writing with South East London Police Licensing Team.
19. Passive Drug Detection Dogs shall carry out a sweep of the event site following completion of the event build up but prior to the event opening to the public. The catering, merchandise stalls and any customer lockers will be included within the drug detection sweep.

Ticketing & Attendance

20. On any advertising material it must state 'subject to licence'. No advertising material is to go out before XX/XX/XX.
21. There will no admission of attendees after XX:XX hours.
22. Every X days the venue will provide Police Licensing with an update of how many tickets have been sold from the date of issue of the Premises Licence.

Dispersal Policy

23. The Premises Licence Holder shall display clear and visible signage to direct all event attendees towards the nearest transport for the duration of the event.
24. There shall be a written dispersal policy, which will include a deployment plan for SIA at nearby transportation hubs, as agreed with the relevant responsible authorities, implemented at the premises and a copy shall be lodged with the local Police Licensing Team. Any amendments to the policy must be agreed in writing with the local London Police Licensing Team.

Welfare & Vulnerable Persons

25. The venue shall have a designated welfare area as required and approved by the Licensing Authority.
26. The venue will employ welfare officers during the event. These will be in addition to the agreed number of SIA and stewards.

27. All staff must receive training on the prevention and identification of spiking, as well as the actions required in such cases. A log of the training shall be maintained and made available immediately to the police and any authorised officer under the Licensing Act 2003.
28. Notices shall be prominently displayed on the premises that spiking will not be tolerated.
29. All staff shall receive customer welfare and vulnerability training from an appropriately qualified trainer. The details of such training (e.g., 'WAVE', anti-spiking, 'Ask for Angela', and/or similar) must be documented and immediately presented upon request to the police and authorised officers under the Licensing Act 2003.

Counter Terrorism

30. Policies and procedures shall be implemented to enhance the premises' preparedness for and resilience against a terrorist attack. These policies and procedures must align with NaCTSO Venues and Public Spaces (VaPS) guidance and appropriate resources within the suite of ACT products. These procedures shall be made immediately available upon request to the police and authorised officers from the local authority, as defined under Section 13 of the Licensing Act 2003.
31. Planned rehearsals of terrorism attack response plans shall be conducted to evaluate the overall preparedness and effectiveness of the policies. A log of these rehearsals shall be maintained and made immediately available upon request to the police and authorised officers from the local authority, as defined under Section 13 of the Licensing Act 2003.
32. The Premises Licence Holder shall actively engage with freely available counter terrorism advice and guidance provided by Counter Terrorism Protect Officers, Counter Terrorism Security Advisors and Royal Greenwich Senior Community Safety Specialist Prevent and Protective Security Officers.
33. All customer-facing staff, including those involved in the sale or supply of alcohol, must complete the Action Counters Terrorism (ACT) Awareness eLearning prior to the commencement of the Festival Event. This training is available at <https://www.gov.uk/government/news/act-awareness-elearning> or <https://www.protectuk.police.uk/group/84>.

APPENDICES – MODEL CONDITIONS RE: LICENSING OBJECTIVES

APPENDIX F – OUTDOOR EVENTS (PUBLIC SAFETY)

General Safety Management

1. An Event Manager, suitably qualified to an appropriate level in Health and Safety management and holding either the National Examination Board of Occupational Safety and Health (NEBOSH) or an equivalent qualification, approved by the Royal Borough of Greenwich (RBG) Entertainment and Licensing Safety Advisory Group (ELSAG), shall be appointed to run the event. This Event Manager must attend all the SAG meetings prior to the event. It would be desirable for this manager to be a member of the Institute of Occupational Safety and Health (IOSH).
2. The final draft of the Event Safety Management Plan (ESMP), Risk Assessments (RA) and Contractor Risk Assessments must be submitted to the Royal Borough of Greenwich (RBG) Entertainment and Licensing Safety Advisory Group (ELSAG) for approval at least 28 days prior to the intended commencement of the event, or other such timescale as agreed with the SAG chair. Once approved, the Premises Licence holder and the appointed Event Manager must implement the Event Safety Management Plan and associated Risk Assessments for the duration of the event.
3. A comprehensive site plan delineating the layout and positioning of all event structures, stalls, facilities, entrances, and exits shall be provided as part of the ESMP. This plan will undergo review and approval by the RBG ELSAG to ensure alignment with the safety standards, crowd flow management and emergency evacuation procedures.
4. The Premises Licence holder (the Licensee) shall abide by any further conditions set out by the RBG EL SAG.
5. Membership of the RBG Entertainment and Licensing SAG will include as a minimum, the Licensee, the event holder, the Licensing Authority, Environmental Health (Pollution), Environmental Health (Health & Safety), Communications Department, Highways Department, the Metropolitan Police, the London Ambulance Service and the London Fire & Emergency Planning Authority.
6. A Crowd Management Plan (CMP) shall be submitted to the RBG Entertainment and Licensing SAG at least 28 days prior to the event. The CMP will detail how the Licensee intends to manage the crowd to ensure that the capacity of the event site and of the tented structures is not exceeded. The CMP must clearly show the proposed locations of all structures, stalls, facilities, stewarding positions, entrances and exits.
7. The premises shall be maintained in accordance with the plan annexed to the Premises Licence and licensable activities shall only take place in those areas designated on the annexed plan.

8. Unless otherwise agreed, no later than 28 days prior to the event the Premises Licence holder must present the EMP to the RBG Entertainment and Licensing SAG for their comments and advice. The Event Management Plan (EMP) shall include, as a minimum:
 - a) Emergency and evacuation procedures;
 - b) Crowd management and stewarding arrangements;
 - c) A detailed plan showing site layout and emergency egress points;
 - d) A detailed sustainability management plan, including waste, energy and water minimisation and disposal.
9. Emergency/pandemic situations, such as Coronavirus COVID-19.
10. The Premises Licence Holder must ensure that the event is run in accordance with the EMP.
11. The Premises Licence Holder shall ensure that Risk Assessments are regularly produced for the events, and these shall be made available to the Environmental Health (Health and Safety) no less than 28 days before the event.
12. The Premises Licence Holder must nominate one person for the event to act as safety co-ordinator. This person must be authorised by the Premises Licence Holder to act on their behalf to ensure that the reasonable requests made by RBG Entertainment and Licensing SAG are carried out.
13. The Premises Licence Holder must notify the RBG Entertainment and Licensing SAG of the nominated safety co-ordinator details.
14. A communication system must be provided to ensure the effective operation of the site under both normal and emergency evacuation conditions. The Premises Licence Holder must provide an adequate incident control centre and a rendezvous point for the Police and other emergency services.

Structures

15. The plan containing sightings of all structures, stalls, facilities, entrances and exits shall be submitted with the application and approved by the RBG Entertainment and Licensing SAG.
16. Stages, roof structures and any other temporary or special structures shall be of adequate strength and stability, both in service and in construction. They shall be assembled in accordance with plans, calculations and specifications drawn up by a competent designer. Details of the construction of these structures together with any necessary calculations must be submitted for approval under the Section 30 of the London Building Act 1939 to the RBG Building Control Department. Failure to provide this information may result in Premises Licence Holder being unable to erect and/or use the structure for the event.
17. Full structural design details and calculations of all and any structures proposed to be erected within the licensed area, must be submitted to the RBG Building Control Department. A certificate issued by a competent person or engineer verifying that the

completed structure has been erected in accordance with the structural drawings. Design specification must be available for inspection prior to that structure being put in use during the licensed event.

18. Any moving flown equipment must contain a device or method whereby a failure in the lifting system would not allow the load to fall. All hung scenery and equipment must be provided with a minimum of two securely fixed independent suspensions, so that in the event of failure of one suspension the load would be safely sustained.
19. Where appropriate, capacities will be set for any temporary structures in accordance with the Technical Standards for Places of Entertainment and agreed in writing with relevant Responsible Authorities.
20. Details, such as locations of emergency exits and signage, fire warning and fire fighting equipment, within all marquees, tented structures and temporary structures should be provided.

Fire Safety & Emergency

21. All fabric, including furnishings, curtains, drapes and other items of scenery used on stage, as well as materials used for the construction of tents and marquees, or plastic and weather sheeting, shall be flame retardant and meet the relevant British Standards. Certificates of Compliance must be available upon request by the RBG Entertainment and Licensing SAG.
22. The Premises Licence Holder must maintain a regular safety patrol at all times when the public are present in the licensed area to check for and guard against possible emergency hazards. The area underneath the stage must be kept clear. Flammable materials must not be stored under the stage or in the proximity of it.
23. Emergency exits and entrances to the event area must be kept clear at all times and must be provided with clearly visible emergency signage.
24. The amount of diesel fuel stored for the generators shall not exceed the amount required for the event. The diesel fuel should be stored in an enclosed space away from the public. Authorised personnel only may access it.
25. Petrol fuelled generators are not permitted on the event site.
26. All generators and cooking facilities shall be stored in a guarded area away from the public. Authorised personnel only may access it. Appropriate means of fire extinguishing must be provided.
27. A schedule detailing types and locations of emergency equipment must be submitted to the RBG Entertainment and Licensing SAG.

Crowd Management

28. The licensee must ensure that the Egress Management Plan is presented to and agreed by the RBG Entertainment and Licensing SAG no later than 28 days prior to the commencement of the event. Please note: The Egress Management Plan may require the closure of ***** area or other surrounding roads with the approval of the relevant authorities.
29. The licensee will provide adequate means of control to ensure that only permitted numbers of persons gain access to the event site and that the capacity of the site is not exceeded.
30. The licensee will provide suitable rigid barriers or fences around the stage and any other locations where the crowd density needs to be controlled to ensure the safety throughout the event site. The barriers will be subject to loading and designed to withstand right-angle and parallel loads in line with probable crowd pressure
31. The licensee, as agreed by the RBG Entertainment and Licensing SAG, shall engage sufficient numbers of competent stewards. During the event, all parties shall communicate using two way radios. A minimum of one radio per two stewards shall be provided. All stewards would have been briefed on their duties and actions in the event of an emergency. All stewards must wear jackets or tabards that readily identify them as such; and shall be at least 18 years old.
32. Any queue formed outside the premises shall be stewarded at all times to minimise any disturbance to the neighbourhood.

Special Effects

33. Any special effects or mechanical installations shall be arranged and stored to minimise any risk to the safety of those using the premises. Where consent has previously not been given, the following special effects will only be used on 10 days prior notice being given to the Licensing Authority and Environmental Health (Health and Safety):
 - dry ice and cryogenic fog;
 - smoke machines and fog generators;
 - pyrotechnics, including fireworks;
 - firearms;
 - lasers;
 - explosives and highly flammable substances;
 - real flame;
 - strobe lighting.
34. A written notice shall be given to the Licensing Authority and the Environmental Health (Animal Health) no later than 28 days prior to the event of any performances that include animals.

Welfare

35. Sanitary conveniences and the points of drinking water, information, first aid and fire must be signposted using legally compliant signage. The licensee shall provide a sufficient

number of signs visible from all parts of the event site lettering on the signage shall be at least 225 mm high. A sufficient number of signage that is visible from all parts of the event site should be provided.

36. The licensee must provide adequate numbers of sanitary accommodation for the duration of the event, including build up and break down. The sanitary conveniences must be maintained to the standards contained within the Health and Safety Executive's (HSE) Event Safety Guide (Guide to Health, Safety and Welfare at Pop Concerts and Similar Events-HSG 195). Suitable arrangements must also be made for the collection and disposal of used hand towels, sanitary towels and other refuse from the sanitary accommodation points.
37. There shall be a welfare point for the reporting and management of lost children. The welfare point will be staffed by trained (and appropriately checked by the Disclosure and Barring Service (DBS)) staff who will be in constant radio contact with the event manager/head steward and the event safety co-ordinator.
38. The suitable medical and first aid facilities and staff shall be provided in line with the HSE "Events Safety Guide" (HSG195).

Electricity and Fuel

39. The electrical supply will comply with:
 - BS7909 2011 – Code of Practice for Temporary Distribution System for AC Electrical Supplies for Entertainment Lighting Technical Services and Related Purposes;
 - BS7430 2011 – Code of Practice for Earthing;
 - BS 7671 2008 – Requirements for Electrical Installations;
 - Socket outlets for use with hand held temporary or portable electrical equipment on the stage or performance areas(s) shall be of the type protected by a Residual Current Device (RCD) having a 30mA tripping current;
 - All portable electrical equipment shall be PAT tested and marked accordingly;
 - High-energy efficiency lighting must be used, with an energy rating of A or above, unless otherwise agreed by the RBG Entertainment and Licensing SAG.
40. Electrical generators, where used during the event, must be:
 - a. Suitably located clear of buildings, marquees and structures and away from any flammable materials;
 - b. Enclosed and accessed by authorised personnel only;
 - c. Able to provide power;
 - d. Provided with back up electrical generators that comply with relevant standards to power essential communications, lighting and safety systems in the event of primary generator failure, unless otherwise agreed by the RBG Entertainment and Licensing SAG;
41. The Premises Licence Holder must ensure that a sufficient number of competent persons is employed to assess the electrical requirements at the site and the compatibility of the electricity supply with the equipment to be used throughout the

event. Appropriate safety devices (such as 30mA Residual Current Devices at source) must be used for electrical apparatus, particularly for any electrical equipment exposed to adverse conditions or electrical equipment to be used in association with any hand held devices (e.g. microphones). The electrical installation certificate of inspection, carried out by a competent person should be made available for inspection.

42. Electrical cables in the public arena must be protected by proprietary cable ramps or suspended at least 2.4m above ground level (5.8m where passing over a possible vehicle route). In the areas that public do not access, cables may be covered with rubber matting.
43. All spare fuel, including LPG, must be stored safely in accordance with relevant Health and Safety legislation. Suitable safety signage and fire fighting equipment shall be provided in the close proximity of this storage.
44. Suitable barriers shall be provided around all stage, generators, mechanical plant, non-public areas and exposed edges.
45. Petrol fuelled generators will not be permitted at the event site.
46. All generators and cooking facilities shall be suitably guarded and located in the areas accessible to the authorised personnel only. Appropriate fire extinguishers shall also be provided.

Lighting

47. All parts of the licensed area must be adequately lit (day or artificial light). All safety signage shall be suitably illuminable. Details of the locations and level of illumination must be submitted to the RBG Entertainment and Licensing SAG at least 28 calendar or working days prior to the event commencing.
48. All additional and temporary lighting must be positioned safely and suitably guarded.

Counter Terrorism

49. Policies and procedures shall be implemented to enhance the premises' preparedness for and resilience against a terrorist attack. These policies and procedures must align with NaCTSO Crowded Places guidance and appropriate resources within the suite of ACT products. These procedures shall be made immediately available upon request to the police and authorised officers from the local authority, as defined under Section 13 of the Licensing Act 2003.
50. Planned rehearsals of terrorism attack response plans shall be conducted annually to evaluate the overall preparedness and effectiveness of the policies. A log of these rehearsals shall be maintained and made immediately available upon request to the police and authorised officers from the local authority, as defined under Section 13 of the Licensing Act 2003.

51. Counter Terrorism Policies and Procedures must be tested and reviewed every 12 months. A log of these policy reviews shall be maintained and made immediately available upon request to the police and authorised officers from the local authority, as defined under Section 13 of the Licensing Act 2003.
52. The Premises Licence Holder shall actively engage with freely available counter terrorism advice and guidance provided by Counter Terrorism Protect Officers, Counter Terrorism Security Advisors and Royal Greenwich Senior Community Safety Specialist Prevent and Protective Security Officers.
53. All customer-facing staff, including those involved in the sale or supply of alcohol, must complete the Action Counters Terrorism (ACT) Awareness eLearning prior to the commencement of the Festival Event. This training is available at <https://www.gov.uk/government/news/act-awareness-elearning> or <https://www.protectuk.police.uk/group/84>.

General

54. The Premises Licence Holder will comply with the reasonable requirements of all relevant Responsible Authorities.
55. Only emergency vehicles may access the site during the event.
56. Authorised enforcement officers of the Licensing Authority and from the Responsible Authorities, such as Environmental Health, Metropolitan Police and London Fire Brigade, must be provided with the security passes for full and free access to the event site at all times.
57. Alcohol will only be served for consumption on the premises in open plastic or paper receptacles or a environmentally sustainable alternative.
58. The applicant shall ensure that any intoxicated event attendees would not be allowed to enter the event site, will not be served any alcohol and may be asked to leave.
59. A personal licence holder working under the DPS shall supervise each alcohol-selling outlet. All staff must be suitably trained.

APPENDICES – MODEL CONDITIONS RE: LICENSING OBJECTIVES

APPENDIX G – OUTDOOR EVENTS (PREVENTION OF PUBLIC NUISANCE)

A large temporary event which cannot be authorised under a Temporary Event Notice due to the numbers of persons attending will generally be licenced under a time-limited Premises Licence lasting for the duration of the event. Where regulated entertainment is included, the Royal Borough will set noise limits in line with The Noise Council's "Code of Practice on Environmental Noise Control at Concerts"; other guidelines; and recommended noise control procedures. With regard to the prevention of Public Nuisance, the applicant is strongly advised to submit a draft Event Management Plan (EMP) prior to submitting a full application. The EMP should set out how the applicant intends to promote the prevention of public nuisance licensing objective and consideration should be given to the inclusion of the conditions set out below.

1. The premises shall not be used for licensable activities under the terms of this premises licence until an appropriate Noise Management Plan (NMP) has been approved by the Royal Borough of Greenwich Environmental Health Community Protection Team. Thereafter, Regulated Entertainment Events falling within the ambit of the NMP must be conducted in accordance with the terms of that Plan. Nothing in this condition shall prevent Environmental Health and the premises licence holder from agreeing amendments to the NMP, from time to time, in order to promote the licensing objectives and/or due to the operational needs of the premises.
2. Music noise levels during soundchecks and the event shall not exceed 65dB(A) Laeq15min at one metre from the façade of any noise-sensitive premises. The 65dB(A) limit applies to all frequencies. A competent person with access to a suitable Type 1 or Type 2 sound level meter shall be available to check noise levels at the façade of the nearest noise-sensitive property.
3. Fourteen (14) days prior to the event, the applicant should write to all surrounding residents giving full event details. The letter must include a contact telephone number for the event management on the day. This telephone line must be manned for the duration of the event. A written record of all noise complaints shall be kept and submitted to the Royal Borough of Greenwich Environmental Health Pollution team no later than seven (7) days after the event.
4. The event organisers shall provide unrestricted access to the Royal Borough of Greenwich Environmental Health Community Protection Team, and the Licensing Team, and any other authorised agent of the council, and provide contact details for the site management team in the event the council receives complaints regarding public nuisance. Contact details of the site management team should be provided fourteen (14) days prior to the event.
5. At the conclusion of the event, the event organiser shall provide to the Council's Community Protection Team:
 - a) A copy of the complaints log; and,
 - b) A copy of the DB readings captured at designated separate points during the event.

6. All activities associated with the build and breakdown which are audible outside the site boundary shall only take place between the following hours:

Monday to Friday - 8:00am to 6:00pm;
Saturday - 8:00am to 1:00pm;
and at no time on Sundays or bank Holidays.

The Royal Borough would look to an emphasis by event organisers to promote sustainability grounds, e.g. a move away from “plastic” drinks containers and the avoidance of glass in favour of non-glass reusable or biodegradable drinkware.

In line with other applications of this nature, we adhere to the recommendations contained in the “Code of Practice on Environmental Noise Control at Concerts”. The following table lays out the Music Noise Levels (MNL) recommended by the code:

As this venue *[insert name if using for bespoke reference]* falls into the category of “Urban Stadia or Arenas” / “Other Urban or Rural Venue” / “All Venues” *[delete that which does not apply]*, then we would recommend the MNL be restricted in line with these recommendations. Any events that exceed the maximum number of twelve (12) per annum shall not be audible at the nearest noise-sensitive premises.

Concert days per calendar year, per venue	Venue Category	Guideline
1 to 3	Urban Stadia or Arenas	The MNL should not exceed 75dB(A) over a 15-minute period.
1 to 3	Other Urban and Rural Venues	The MNL should not exceed 65dB(A) over a 15-minute period.
4 to 12	All Venues	The MNL should not exceed the background noise level by more than 15dB(A) over a 15-minute period.

APPENDICES – MODEL CONDITIONS RE: LICENSING OBJECTIVES

APPENDIX H – OUTDOOR EVENTS (PROTECTION OF CHILDREN FROM HARM)

With regard to the Protection of Children from Harm during outdoor events, the applicant is strongly advised to submit a draft Event Management Plan (EMP) prior to submitting a full application. The EMP should set out how the applicant intends to promote the Protection of Children from Harm licensing objective and consideration should be given to the inclusion of the conditions set out below.

1. The Challenge 25/Think 25 or contemporary equivalent proof of age scheme shall be operated at the premises. All customers who appear under the age of 25 will be challenged to prove that they are over 18 when attempting to purchase alcohol. Acceptable forms of ID include a photo driving licence, passport, or home office approved identity card bearing the holographic 'PASS' mark. If the person seeking alcohol is unable to produce an acceptable form of identification, no sale or supply of alcohol shall be made to or for that person.
2. All bar-staff shall be trained in the law about the sale of alcohol. Such training will include challenging every individual who appears to be under 25 years of age and to refuse service where individuals cannot produce acceptable means of identification, acceptable forms of ID and using the refusal register. Training shall be conducted prior to the event. A training log shall be made available for inspection by Police and "authorised persons" (as defined in the Licensing Act 2003) immediately upon request.
3. The following posters, or their contemporary equivalent shall be displayed conspicuously on the premises in customer facing areas: (a) 'Think 25' to advise potential purchasers that suitable proof of age will be required for all purchasers who appear to be under 25. (b) Any updated and relevant posters which highlight child protection and safeguarding measures as given by Police and "authorised persons".
4. A refusals log shall be kept at the premises and made immediately available on request to the Police or an "authorised person". The log must record all refused sales of alcohol and include the following: (a) the identity of the member of staff who refused the sale; (b) the date and time of the refusal; (c) the alcohol requested and reason for refusal; and (d) description of the person refused alcohol.
5. The Premises Licence Holder shall write, maintain and operate within a Vulnerable Persons Policy which must include Welfare (WAVE or equivalent), anti-spiking and Ask for Angela or equivalent training for all members of staff.
6. The venue will employ welfare officers during the event. These will be in addition to the agreed number of SIA and stewards.
7. The premises shall provide a designated tent or area for lost children and vulnerable individuals. Signage must be prominently displayed to direct people to this location.

8. All welfare points shall be staffed by trained (and appropriately checked by the Disclosure and Barring Service (DBS)) staff who shall maintain constant radio contact with the event manager/head steward and/or the event safety co-ordinator.

Analysis of Alcohol Related Indicators Within Cumulative Impact Zones in the Royal Borough of Greenwich (March 2025)

Produced by:
Data, Intelligence, and Information Hub
Community Safety and Environmental Health
Royal Borough of Greenwich

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Analysis of indicators with existing CIZs

1. Methodology

Indicator Definitions

Data on licensed premises was extracted from Tascomi, a platform used by Royal Borough of Greenwich to manage premise licences, and environmental health functions. Licensed premises that supplied alcohol were identified using a binary field indicating "Yes" or "No" for alcohol supply.

Alcohol-related offences were obtained from the Metropolitan Police Service (MPS) via the CONNECT data platform. These offences were defined as incidents where the victim had consumed alcohol and/or the suspect was under the influence of alcohol at the time of the offence. The data used for alcohol-related offences was within the latest financial year period (April 2024 to March 2025), with a committed time and date between 01/04/2024 00:00 and 31/03/2025 23:59.

Alcohol-related ambulance callout data was extracted from the SafeStats platform, using data provided by the London Ambulance Service (LAS). The LAS defines an alcohol-related callout as any incident where alcohol is a contributing factor to the patient's condition or the reason for the emergency call. This includes situations such as injuries sustained while under the influence and alcohol poisoning.

Between the 2011 and 2021 Censuses, some Lower Super Output Area (LSOA) boundaries within the Royal Borough of Greenwich were modified—some were merged, split, or slightly adjusted to reflect shifts in population distribution. As such, care was taken when comparing datasets across different years to account for these boundary adjustments.

Spatial Analysis

Both licensed premises data and alcohol-related offence data contained spatial references, which enabled geographic mapping using QGIS (Quantum Geographic Information System) software. QGIS is an open-source geographic information system used for spatial analysis and mapping.

Spatial references were based on EPSG:7405 – OSGB36 / British National Grid. EPSG codes are standardised identifiers used to define coordinate systems, map projections, and geodetic datums in GPS and GIS applications. A slight variation observed in the calculated km² values for each Cumulative Impact Zone (CIZ) may be attributed to

differences in projection methods or grid accuracy, although such discrepancies are minimal and unlikely to affect the overall interpretation of spatial patterns.

In QGIS, points such as offence locations or licensed premises are mapped to a CIZ using a spatial join, which checks the geographic relationship between the point layer and the CIZ polygon layer. Each point is assessed to determine whether it intersects or falls within a CIZ boundary. When a match is found, the name or ID of the corresponding CIZ is added as a new attribute to the point. This allows each point to be associated with the specific CIZ area it lies in, enabling further analysis such as counts, densities, or comparisons between zones. Care must be taken to ensure both layers use the same projection, and that boundary precision is accounted for to avoid missing points located near the edges of zones.

Hexagonal grid cells were generated using spatial analysis tools. Each individual hex grid covered an area of 10 hectares, equivalent to 0.1 km² or 100,000 square metres (m²). These hex grids are used as an alternative to administrative boundaries and are not directly applicable to statistical areas such as LSOAs. This approach ensures uniform spatial units, supporting consistent analysis across areas that may otherwise vary in size and shape.

Background maps, including road layers, were exported from the Ordnance Survey. These layers provided additional context for visualising the spatial distribution of licensed premises, alcohol-related offences, and ambulance callouts in relation to road networks. Thematic maps were produced using the Natural Breaks (Jenks) classification method. This algorithm identifies natural groupings in the data by minimising variance within each class and maximising variance between classes, resulting in more meaningful categories for visual interpretation of spatial patterns.

Alcohol-related ambulance callouts were calculated as a rate per population at the highest granularity available—LSOA level. Rates were calculated by dividing the number of alcohol-related callouts by the LSOA mid-2022 population estimates, available from the Office for National Statistics (ONS) here. The resulting measure is defined as 'Alcohol-related Ambulance Callouts per LSOA – Rate per 1,000 Population (2022-2024)'.

Exclusion of noise data

Previously, noise data which covered the period 1st March 2021 to 28th February 2022 was provided by the Royal Borough of Greenwich Council's Community Protection Team. This dataset contained complaints made by the public to the council about noise created by on-license premises. A total of 54 complaints were recorded, of which 30 were in CIZs². This equated to an average of less than one complaint per month. Due to the low volume,

² Royal Borough of Greenwich. (2021) Statement of licensing policy: Issued under Section 5(1) of the Licensing Act 2003. Version 6.1 [Last updated 23 May 2022], p. 116.

there is justification in exclusion of noise complaints. Considering the noise data pre-COVID, there were a total of 76 complaints, 52 within CIZs defined at the time³. That equates to an average of one report per week about an on-licence premise.

The intention of this methodology is to ensure the analysis is as robust and accurate as possible, considering the complexities of the data to provide meaningful and reliable results.

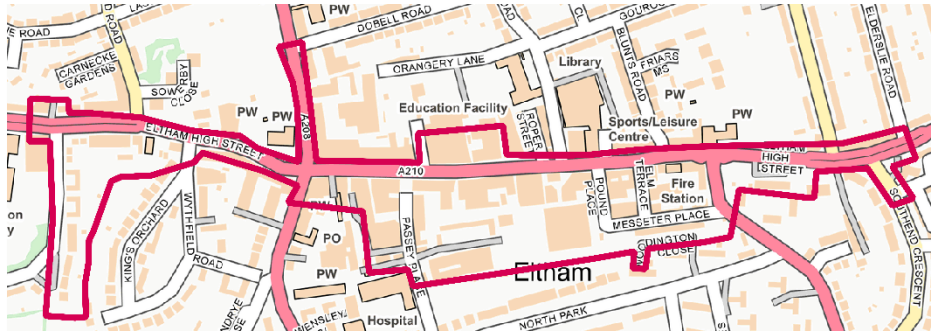
2. Current CIZs

There are 7 CIZs across the borough.

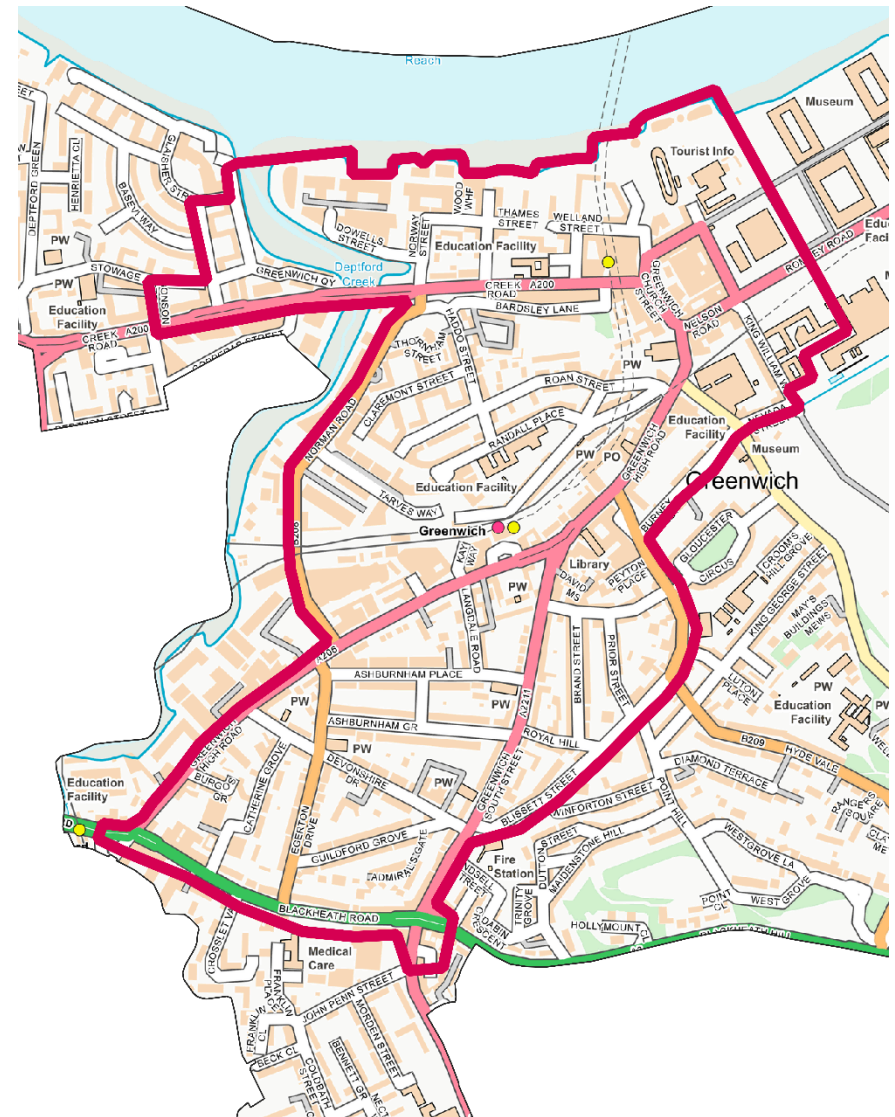
- Eltham High Street
- Greenwich Town Centre
- Herbert Road/Plumstead Common Road
- Peninsula
- Plumstead High Street
- Trafalgar Road
- Woolwich Town Centre

³ Royal Borough of Greenwich. (2021) Statement of licensing policy: Issued under Section 5(1) of the Licensing Act 2003. Version 6.1 [Last updated 23 May 2022], p. 81.

Eltham High Street



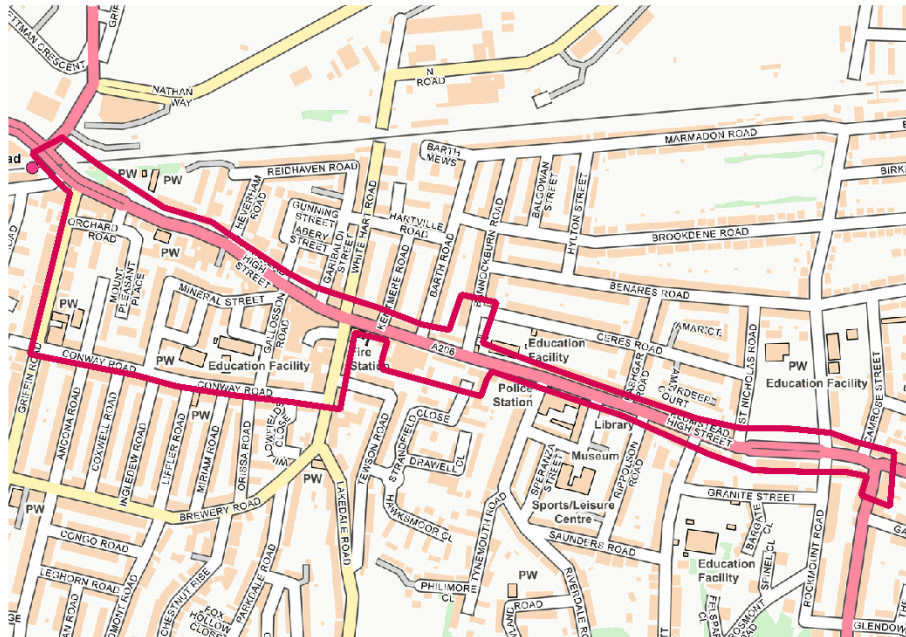
Greenwich Town Centre



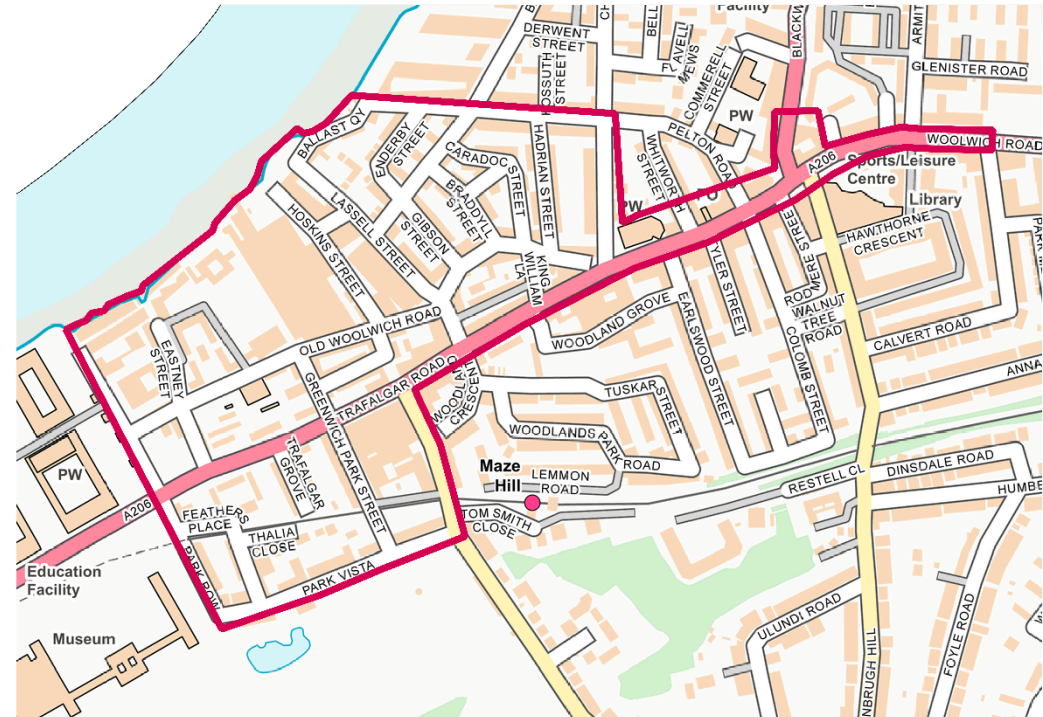
The map displays a residential area with a central road network. A red line traces a path from the top left, through the center, and towards the bottom right. Key roads include Cambridge Road, St Margaret's Grove, St John's Terrace, Wernbrook Street, Plumstead Common Road, Barnfield Gardens, Wrottesley Road, Vambery Road, Isla Road, Genesta Road, Upton Road, and Ennis Road. Several 'PW' (Public Works) locations are marked, and an 'Education Facility' is indicated at the top and bottom. The map also shows various other streets like Edge Hill, Westvale Road, Herbert Road, Barnfield Road, Kirk Lane, Admaston Road, and Silver Road.

The map illustrates the proposed Greenwich Peninsula Light Rail route, highlighted in red and yellow. The route begins at the Ferry Terminal (PT) and runs through the North Greenwich Education Facility, North Greenwich Art Gallery, and North Greenwich Bus Station. The map also shows the River Thames, Bugst Reach, and various streets including Greenwich Way, Greenwich Road, and Greenwich Lane.

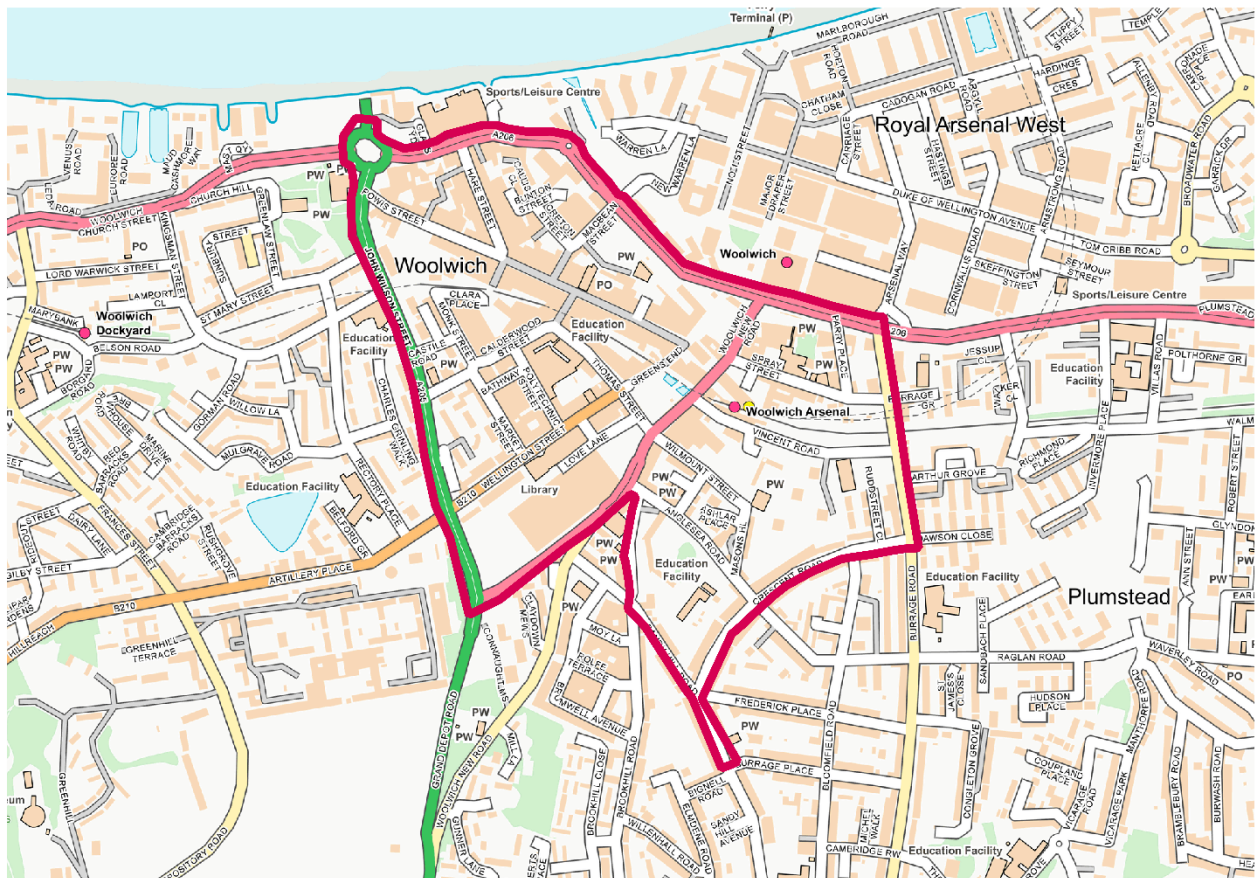
Plumstead High Street



Trafalgar Road



Woolwich Town Centre



3. Analysis of licenced premises related data and current CIZs

Fig 1. Licenced Premises *where alcohol is supplied* (updated January 2025)

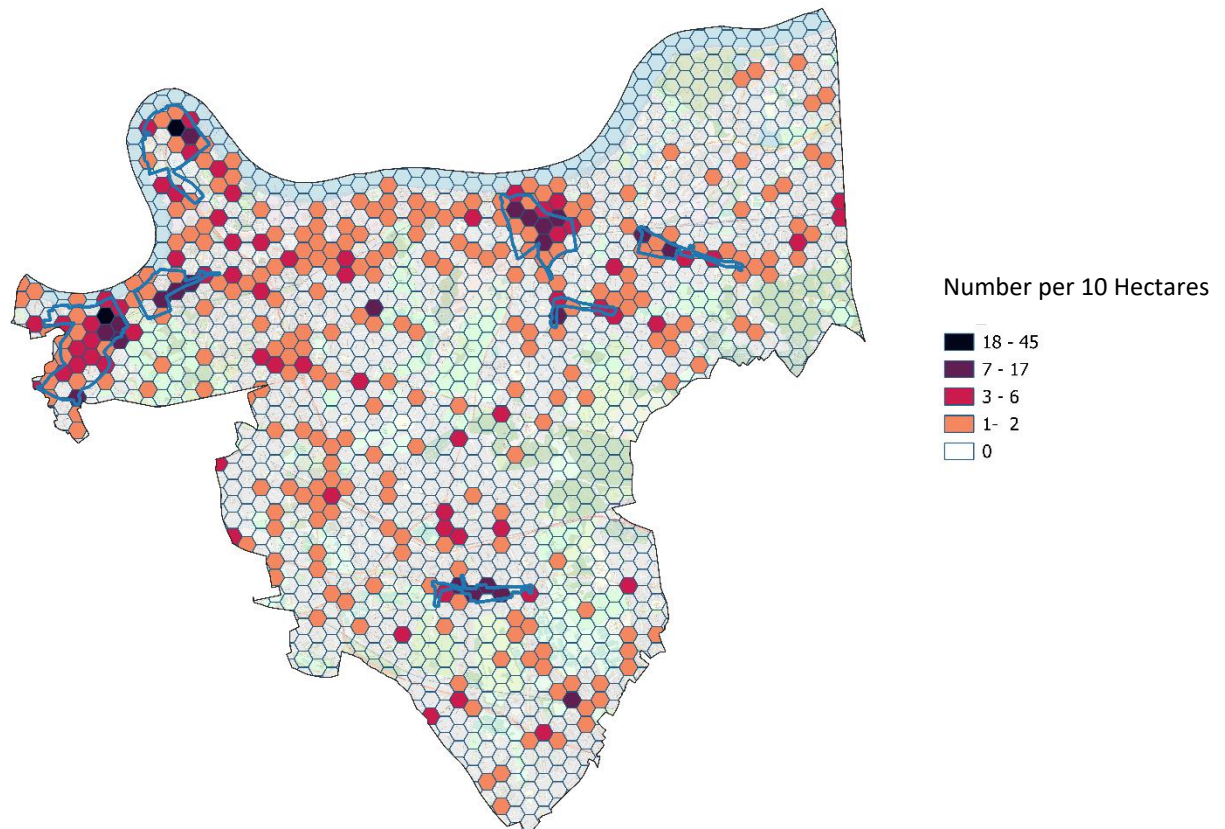
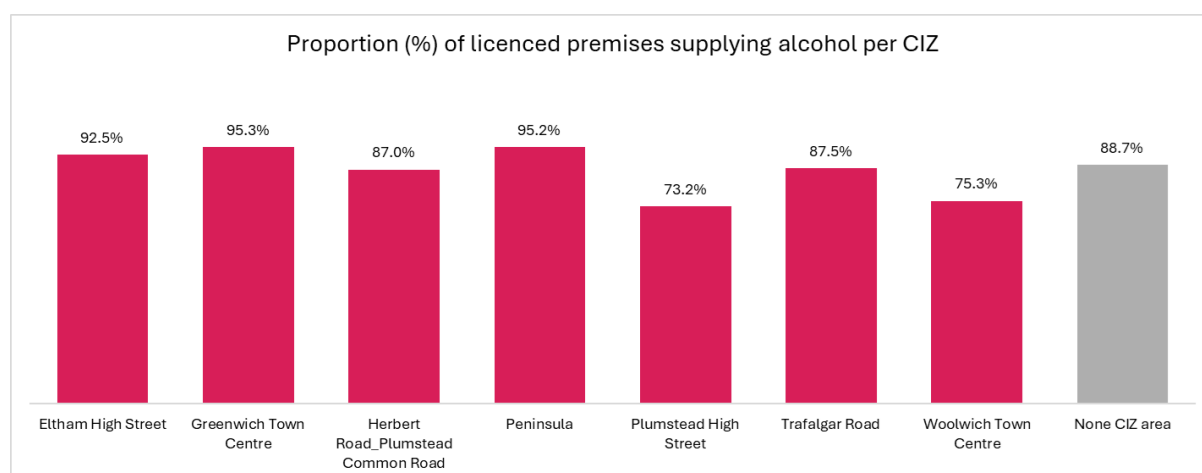


Table 1. Licensed Premise comparisons between previous and current CIZ analysis.

CIZ	area_km2	Licenced Premises (Mar19)			Licenced Premises (Jan25)			Licenced Premises supplying alcohol (Jan25)		
		Number	Premises %	Per km ²	Number	Premises %	Per km ²	Number	Premises %	Per km ²
Eltham High Street	0.14	44	5.0%	312	40	4.1%	284	37	4.3%	262
Greenwich Town Centre	0.75	106	12.1%	142	129	13.1%	173	123	14.2%	165
Herbert Road_Plumstead Common Road	0.08	26	3.0%	329	23	2.3%	291	20	2.3%	253
Peninsula	0.52	87	9.9%	167	83	8.5%	160	79	9.1%	152
Plumstead High Street	0.16	41	4.7%	263	41	4.2%	263	30	3.5%	192
Trafalgar Road	0.24	35	4.0%	146	32	3.3%	133	28	3.2%	117
Woolwich Town Centre	0.49	82	9.4%	169	85	8.7%	175	64	7.4%	132
None CIZ area	48.09	456	52.0%	9	548	55.9%	11	486	56.1%	10

Fig 2. Proportion (%) of licensed premises supplying alcohol per CIZ.



Between March 2019 and January 2025, the total number of licensed premises in Greenwich rose from 877 to 981 — a net increase of 104 premises or roughly 12%. The ‘None’ category, which includes areas outside designated CIZs, accounts for the largest share of this growth, increasing from 456 to 548 licensed premises — a 20% rise. This category also experienced a slight increase in density per square kilometre, although it remains low at 11 premises/km² due to the large area (48km²) it encompasses.

Greenwich Town Centre recorded an increase, from 106 to 129 licensed premises — a 22% rise. Its density also increased from 142 to 173 premises/km², reaffirming its position as a primary nightlife and hospitality hub in the borough. Woolwich Town Centre saw a slight increase of 3 premises, bringing its total to 85 and increasing density from 169 to 175 premises/km². Eltham High Street, Peninsula, and Trafalgar Road all experienced small decreases in the number of premises. For instance, Eltham dropped from 44 to 40, though it remains a high-density area with 284 premises/km². Herbert Road/Plumstead Common Road and Plumstead High Street maintained relatively stable figures. While Herbert Road fell slightly in both absolute numbers and density, Plumstead High Street saw no change in its premises count and retained a steady density of 263/km².

Fig 3. Alcohol-related Offences committed in 2024-25

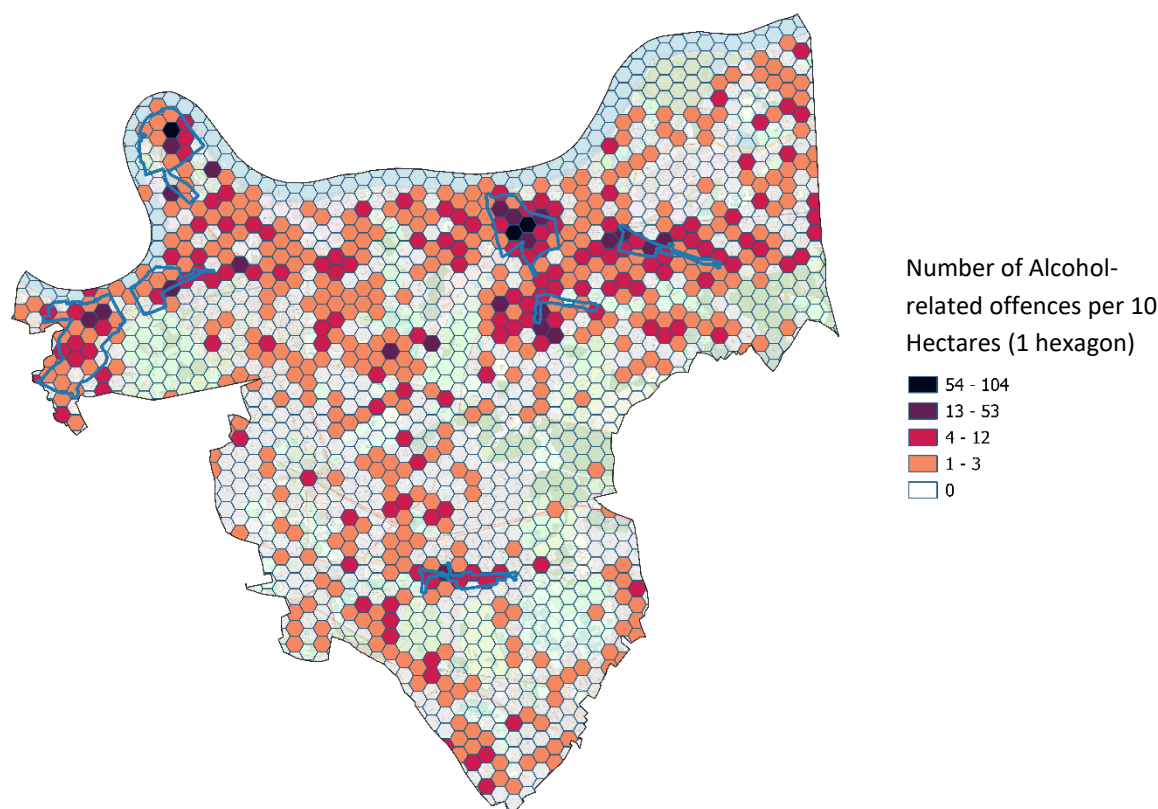
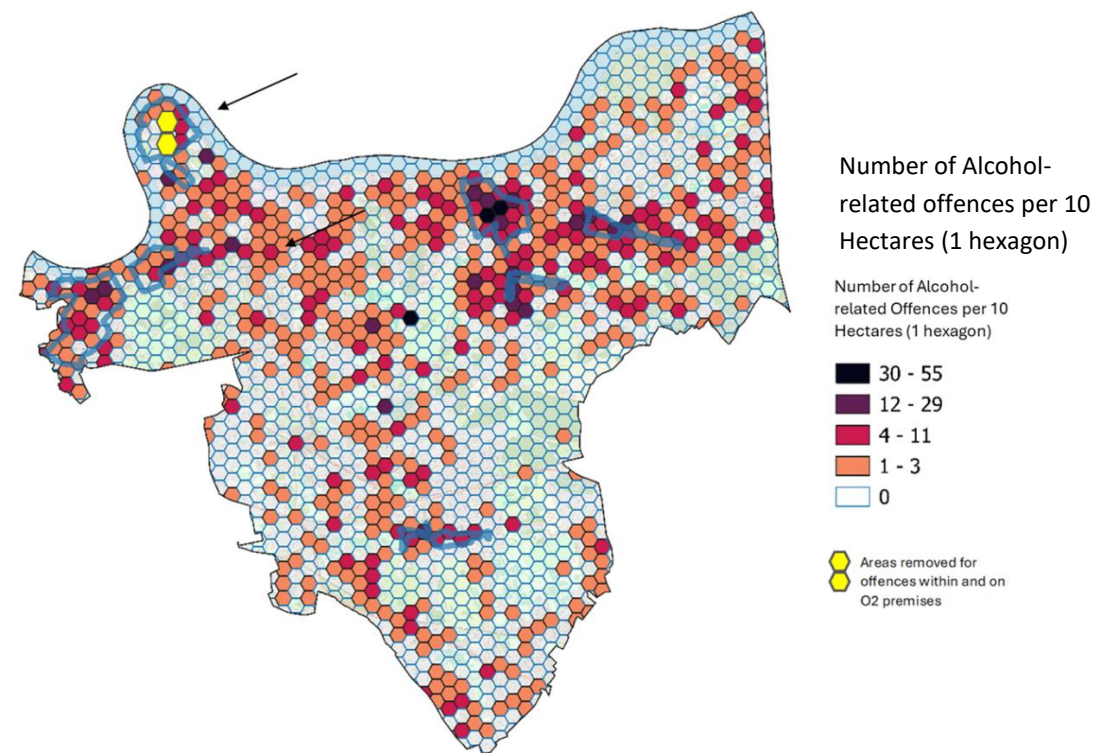


Fig 4. Alcohol-related Offences committed in 2024-25 *excluding offences committed in the O2 Arena.*



The O2 Arena is a significant generator of alcohol-related crime, given the high density of licensed premises in the surrounding area. To gain a clearer understanding of how such offences are distributed more widely across the borough, a revised map (Fig. 4) was produced, excluding incidents directly linked to the O2.

This approach is useful as it removes the disproportionate impact of the O2, helping to reveal underlying patterns elsewhere. Even with the O2 excluded, the map still shows that the borough's CIZs remain areas with higher concentrations of alcohol-related crime. This highlights the continued relevance of the CIZs in identifying and addressing locations where alcohol-related harm is more prevalent.

Table 2. Alcohol-related Offences in 2024-25 by CIZ

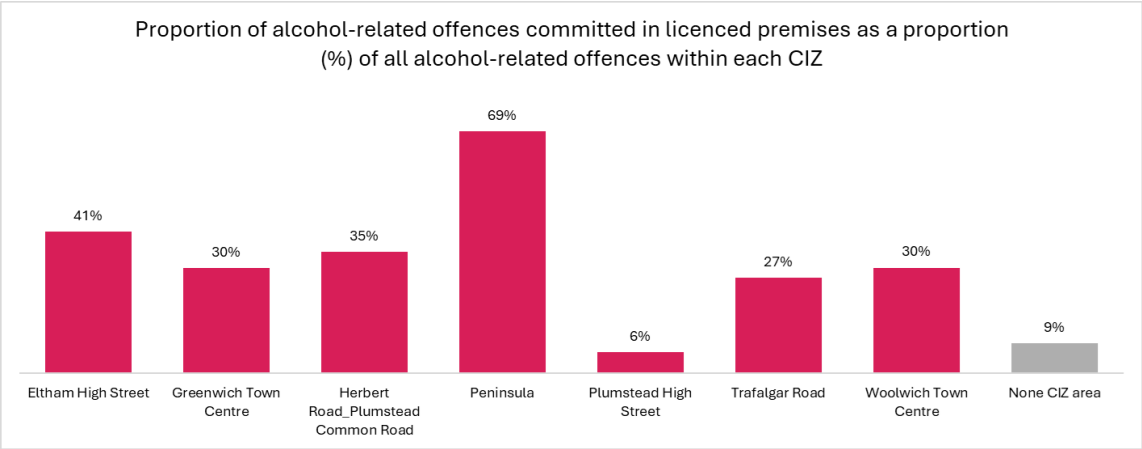
CIZ	area_km2	Alcohol-related Offences 2024/25		
		Number	Offences %	Per km ²
Eltham High Street	0.14	37	1.7%	262
Greenwich Town Centre	0.75	120	5.4%	161
Herbert Road_Plumstead Common Road	0.08	23	1.0%	291
Peninsula	0.52	168	7.6%	323
Plumstead High Street	0.16	66	3.0%	423
Trafalgar Road	0.24	22	1.0%	92
Woolwich Town Centre	0.49	225	10.1%	463
None	48.09	1557	70.2%	32

Table 3. Alcohol-related offences in licenced premises in 2018/19 compared to 2024-25 by CIZ

CIZ	area_km2	Alcohol-related Offences in Licenced Premises 2018/19			Alcohol-related Offences in Licenced Premises 2024/25		
		Number	Offences %	Per km ²	Number	Offences %	Per km ²
Eltham High Street	0.14	12	2.4%	85	15	3.9%	106
Greenwich Town Centre	0.75	41	8.3%	55	36	9.3%	48
Herbert Road_Plumstead Common Road	0.08	15	3.0%	190	8	2.1%	101
Peninsula*	0.52	26	5.3%	50	116	30.1%	223
Plumstead High Street	0.16	12	2.4%	77	4	1.0%	26
Trafalgar Road	0.24	7	1.4%	29	6	1.6%	25
Woolwich Town Centre	0.49	41	8.3%	84	68	17.6%	140
None	48.09	338	68.7%	7	133	34.5%	3

*Peninsula CIZ was established in 2022.

Fig 5. Proportion of alcohol-related offences committed in licenced premises as a proportion (%) of all alcohol-related offences within each CIZ



The data shows some important changes in alcohol-related offences across different areas between 2018/19 and 2024/25. The most significant increase is in the Peninsula area, where offences have risen sharply from 26 to 116. This area now accounts for 30% of all recorded offences, compared to just 5% in 2018/19. The number of offences per square kilometre has more than quadrupled. Woolwich Town Centre has also seen a noticeable rise, with offences increasing from 41 to 68, and the rate per km² going from 84 to 140. Eltham High Street has had a smaller rise in offences.

Offences in Plumstead High Street have dropped from 12 to 4, and Herbert Road/Plumstead Common Road from 15 to 8. Notably, areas outside of designated Cumulative Impact Zones have seen a large fall in offences—from 338 to 133. This suggests more alcohol-related incidents are now happening within the zones themselves, and the inclusion of the Peninsula as a new CIZ.

Fig 5. shows the proportion of alcohol-related offences that occurred within licensed premises compared to all alcohol-related offences in each CIZ area. The Peninsula stands out, with 69% of alcohol-related offences taking place in licensed premises, indicating a strong link between these venues and alcohol-related incidents in that area. Eltham High Street and Herbert Road/Plumstead Common Road also have relatively high proportions, at 41% and 35% respectively, suggesting similar patterns. In contrast, Plumstead High Street has a notably low proportion, with only 6% of offences occurring in licensed venues, which may indicate that most incidents happen in other public spaces.

Fig 6. Proportion (%) of alcohol-related offences in CIZs compared to non-CIZs

Alcohol-related offences in CIZs v Non-CIZs (n=2218)

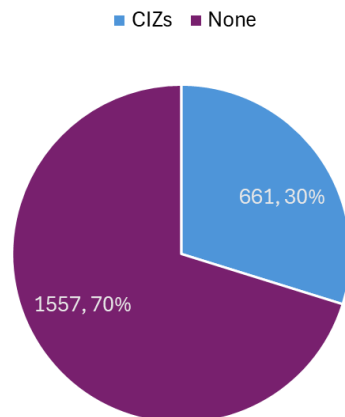
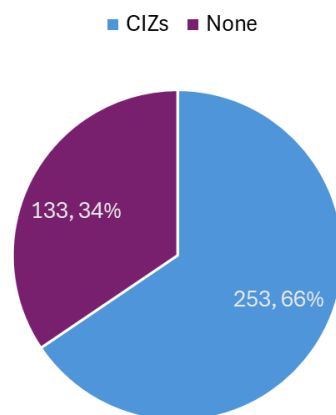


Fig 7. Proportion (%) of alcohol-related offences *within licenced premises* in CIZs compared to non-CIZ areas

Alcohol-related offences within Licenced Premises in CIZs v
Licenced Premises in Non-CIZs (n=386)



Although CIZs represent just 2.4 km², they account for 30% of all alcohol-related offences, with a density of approximately 278 offences per km². In contrast, non-CIZs cover 48 km² but only account for 70% of offences, with a much lower density of 32.4 offences per km². For every 100 offences observed in CIZs, there are approximately 237 offences in non-CIZs. This stark difference in offence density highlights that CIZs, despite their smaller size, experience a disproportionate number of alcohol-related incidents, emphasizing the need for targeted licensing controls and additional safety measures in these high-risk areas.

Table 4. Temporal Pattern of Alcohol-related Offences in 2018/19 and 2024/25

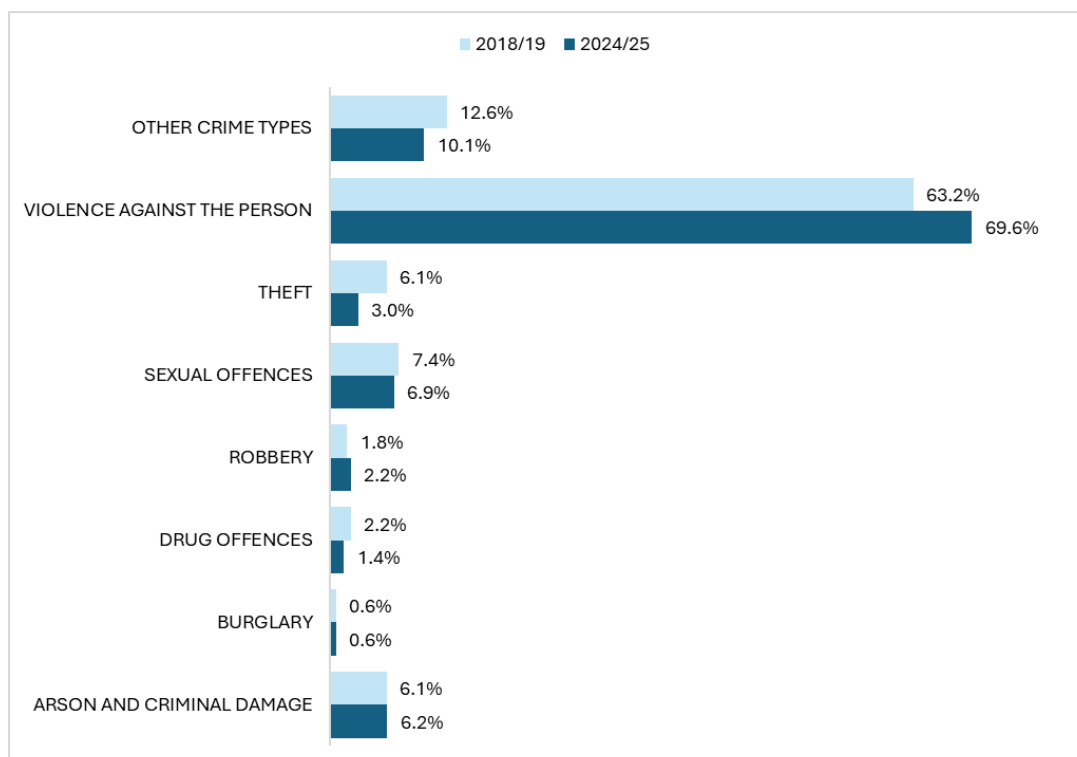
Alcohol-related Offences by hour and day of week 2018/19									
Time	Mon	Tue	Wed	Thu	Fri	Sat	Sun	Total	%
00:00-00:59	11	5	10	19	7	24	24	100	10.7%
01:00-01:59	7	10	9	8	9	22	25	90	9.6%
02:00-02:59	1	2	6	5	7	15	15	51	5.4%
03:00-03:59	0	2	7	2	4	19	12	46	4.9%
04:00-04:59	4	0	1	3	4	7	12	31	3.3%
05:00-05:59	0	2	2	3	3	9	4	23	2.5%
06:00-06:59	0	1	0	0	1	3	4	9	1.0%
07:00-07:59	2	1	0	2	1	3	5	14	1.5%
08:00-08:59	0	0	2	1	1	3	3	10	1.1%
09:00-09:59	3	2	2	2	0	4	2	15	1.6%
10:00-10:59	3	0	1	0	1	1	3	9	1.0%
11:00-11:59	0	1	1	1	0	0	3	6	0.6%
12:00-12:59	3	1	1	5	1	3	5	19	2.0%
13:00-13:59	1	1	4	0	4	3	0	13	1.4%
14:00-14:59	0	4	1	1	1	1	2	10	1.1%
15:00-15:59	5	3	4	3	4	7	3	29	3.1%
16:00-16:59	7	4	5	6	5	5	6	38	4.1%
17:00-17:59	6	8	2	4	4	7	4	35	3.7%
18:00-18:59	3	2	3	3	5	7	5	28	3.0%
19:00-19:59	6	7	6	7	8	14	6	54	5.8%
20:00-20:59	5	9	9	11	12	16	11	73	7.8%
21:00-21:59	3	13	8	8	9	11	13	65	6.9%
22:00-22:59	9	6	9	7	23	18	7	79	8.4%
23:00-23:59	7	13	13	7	15	23	12	90	9.6%
Total	86	97	106	108	129	225	186		
%	9.2%	10.4%	11.3%	11.5%	13.8%	24.0%	19.9%		

Alcohol-related Offences by hour and day of week 2024/25									
Time	Mon	Tue	Wed	Thu	Fri	Sat	Sun	Total	%
00:00-00:59	21	18	16	21	27	57	59	219	9.9%
01:00-01:59	9	26	16	17	12	28	33	141	6.4%
02:00-02:59	15	11	1	12	11	29	42	121	5.5%
03:00-03:59	9	7	4	4	6	12	19	61	2.8%
04:00-04:59	10	7	9	9	16	30	11	92	4.1%
05:00-05:59	3	0	1	8	1	16	15	44	2.0%
06:00-06:59	3	7	6	4	5	9	21	55	2.5%
07:00-07:59	6	3	4	7	0	10	7	37	1.7%
08:00-08:59	0	0	8	1	6	6	7	28	1.3%
09:00-09:59	0	7	14	3	6	13	5	48	2.2%
10:00-10:59	4	4	4	4	2	11	7	36	1.6%
11:00-11:59	10	9	9	2	0	5	8	43	1.9%
12:00-12:59	7	14	6	4	12	4	8	55	2.5%
13:00-13:59	10	1	2	7	1	10	5	36	1.6%
14:00-14:59	8	5	8	4	3	10	5	43	1.9%
15:00-15:59	9	9	7	9	8	9	8	59	2.7%
16:00-16:59	9	3	3	3	8	10	16	52	2.3%
17:00-17:59	10	9	8	15	15	14	8	79	3.6%
18:00-18:59	10	18	10	9	11	20	20	98	4.4%
19:00-19:59	17	16	20	16	13	30	16	128	5.8%
20:00-20:59	18	30	22	15	30	27	18	160	7.2%
21:00-21:59	20	17	23	22	31	29	18	160	7.2%
22:00-22:59	19	12	24	22	35	49	31	192	8.7%
23:00-23:59	17	25	24	25	41	62	37	231	10.4%
Total	244	258	249	243	300	500	424		
%	11.0%	11.6%	11.2%	11.0%	13.5%	22.5%	19.1%		

The comparison between alcohol-related offences in 2018/19 and 2024/25 shows a clear upward trend in both the total number of incidents and a similar distribution across the week. The total number of offences has more than doubled, rising from 1,000 in 2018/19 to 2,190 in 2024/25. Despite this increase, the proportion of offences during the 00:00-01:00 hour has slightly decreased, from 10.7% in 2018/19 to 9.9% in 2024/25. This overall increase could potentially reflect an improvement in data quality, as it might indicate better tracking or reporting of offences across different times of the day, leading to a more balanced and accurate understanding of when these incidents occur. The most notable concentration of offences is at weekends, particularly between 23:00-01:00. Alcohol-related offences accounted for 44% of offences on weekends in 2018/19, and 42% on 2024/25.

Some late-night hours, such as 03:00-04:00, saw a decrease in the percentage of offences, from 4.9% in 2018/19 to 2.8% in 2024/25, despite an increase in the total number of offences. This suggests that while alcohol-related offences remain concentrated in the late-night hours, there is a proportional shift towards earlier in the evening and weekends.

Fig 8. Crime groups of alcohol-related offences (%)



Note: Other crime types include Miscellaneous Crimes Against Society, Fraud or Forgery, Other Accepted Crime, and Other Notifiable Offences.

The comparison between 2018/19 and 2024/25 reveals several key trends in alcohol-related offences. Violence against the Person has seen a notable increase, rising almost 7-percentage points from 63% in 2018/19 to 70% in 2024/25, suggesting a growing link between alcohol-related incidents and violent offences. In contrast, arson and criminal damage remained largely stable. Robbery and sexual offences remained stable around 2% and 7%, respectively, over the two time periods.

Fig 9. Alcohol-related Offences committed in 2024-25, with a classification of Violence Against the Person.

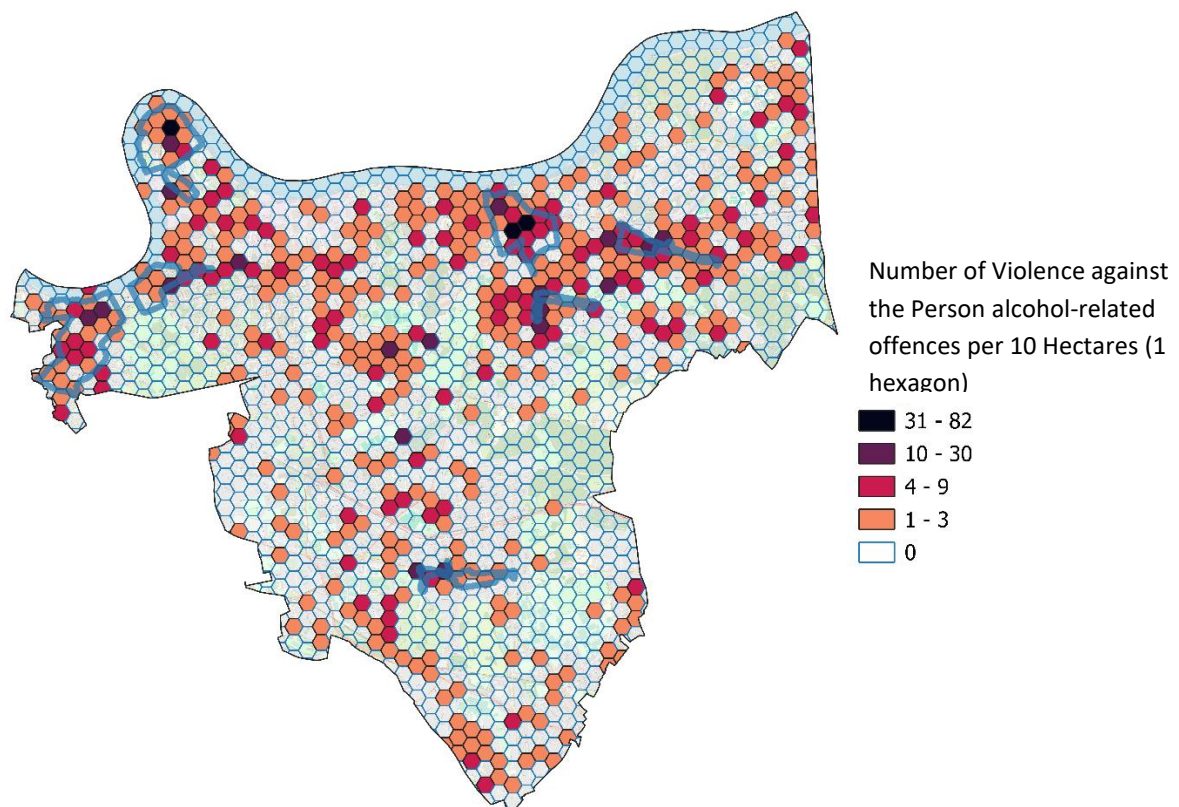


Fig 10. Crime groups of alcohol-related offences (%) per CIZ

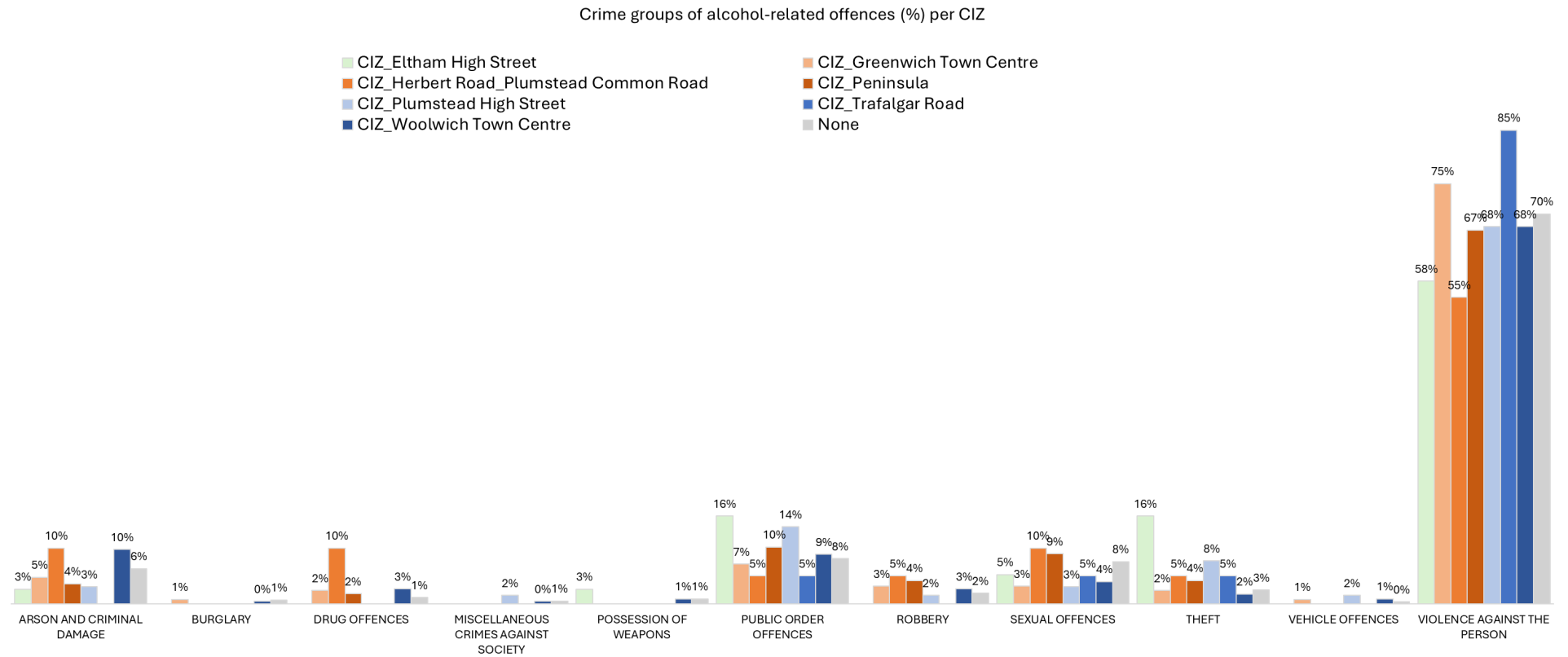


Fig 11. Violence against the Person offences as a proportion of all alcohol-related offences (%) per CIZ

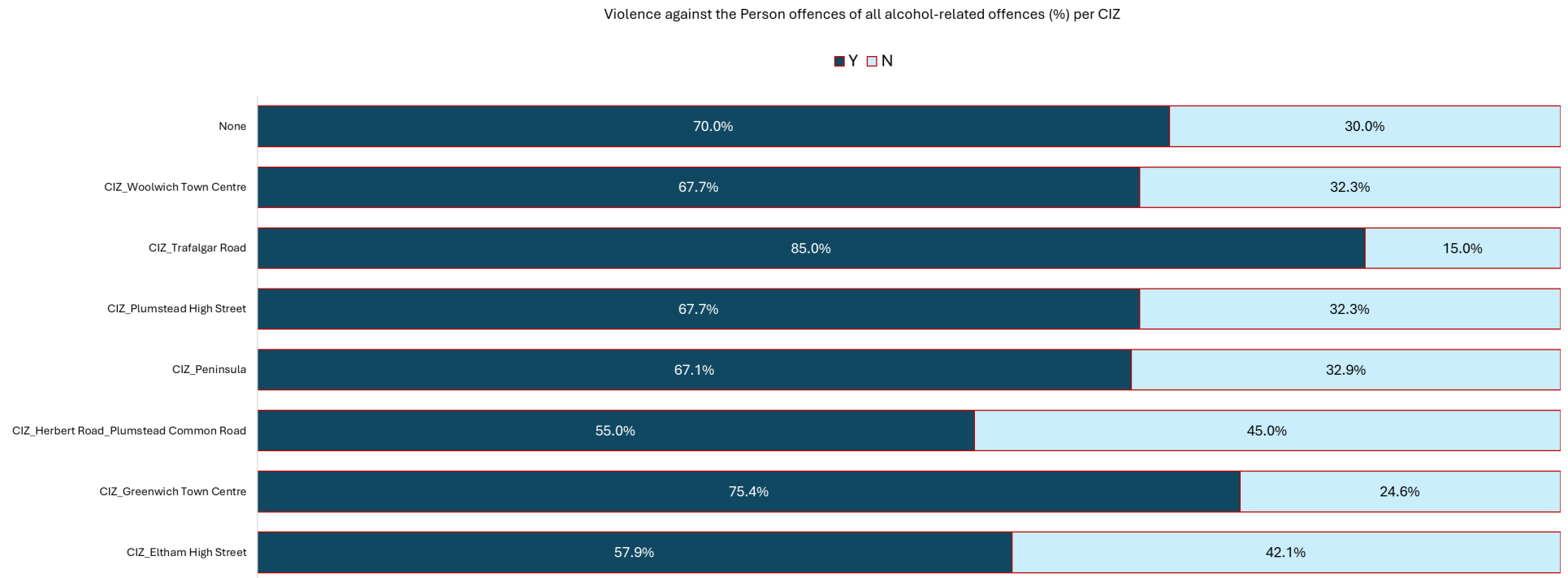
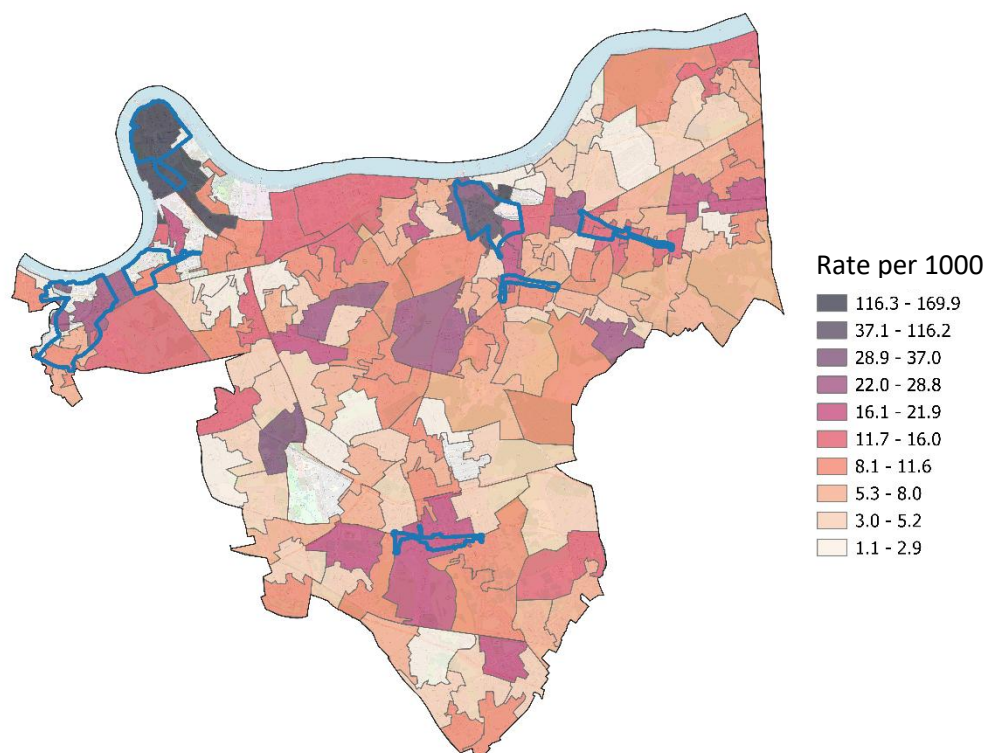


Fig 12. Alcohol-related Ambulance Callouts per LSOA – Rate per 1000 population (2022-2024)



Broadly, higher rates of ambulance callouts are associated with LSOAs which cover CIZs. There are 13 LSOAs in the highest 4 groups (with a rate of 22 per 1000 or higher), with 9 (69%) covered in or directly next to existing CIZs.

5. Conclusion

Following the analysis undertaken, it is concluded that the existing Cumulative Impact Zones (CIZs) remain appropriate and effective in promoting the licensing objectives set out in the Licensing Act 2003⁴. The findings do not indicate that any other areas within the borough currently exhibit conditions that would justify a similar level of consideration for CIZ designation. Accordingly, there is no justification currently to amend the existing CIZ designations or their existing boundaries.

⁴ Licensing Act 2003. (2003) Licensing objectives. Available at: <https://www.legislation.gov.uk/ukpga/2003/17/section/4> (Accessed: 2 May 2025).