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15 November 2024

Dear Mr Akinola

Deputation: Licensing Committee 19 November 2024

We would be grateful for the consideration of our deputation at the Licensing Committee meeting on 19 November 2024.

Draft Statement of Licensing Policy

Shaftesbury Capital plc welcome the draft Statement of Licensing Policy recently published in the Licensing Committee report. In particular, we support the proposals to:

1. Extend Framework Hours by 30 minutes.
2. Remove the Special Policy Areas ("SPAs").
3. Provide greater emphasis on the promotion of equality, inclusivity, safeguarding and women's safety in licensed venues.

We have previously shared an independent night time and evening economy study undertaken by Arcola Research and Dr Philip Hadfield in respect of the Seven Dials SPA. Their findings are consistent with the conclusions of Six til Six and MAKE Associates, in particular that "*there is insufficient compelling evidence to justify the publication of a CIA to promote any of the licensing objectives in any part of the borough of Camden*" (para 4.2.3 of the Six til Six and MAKE Associates report). These independent reports, together with our own on-the-ground experience, provide a strong evidential basis to justify the removal of the SPAs.

Shaftesbury Capital plc

Our property portfolio makes up the most vibrant areas of London's West End. With a diverse mix of restaurants, cafés, bars, shops, residential and offices, our destinations include the high footfall, thriving neighbourhoods of Seven Dials, Covent Garden, Carnaby Street, West Soho, and Chinatown – we are



heavily invested across Camden and Westminster. We focus on the sustainable re-purposing of existing buildings and aim to minimise the environmental impact of our operations across the business.

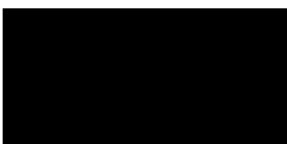
We take a proactive approach to estate management and a responsible curation of licensed tenants. Our suite of measures help to ensure that our tenants have a positive impact in the West End and do not contribute to adverse cumulative impact. In Seven Dials, measures include:

- a) Extensive stewardship of the Seven Dials and wider Covent Garden estate and public realm, including 24/7 monitoring of state of the art CCTV cameras, security patrols, litter picking and safeguarding;
- b) A thoughtful curation of our ownership, introducing many new high quality, well managed operators and a careful vetting process of incoming tenants who share our values around a responsible approach to stewardship;
- c) Stringent leasehold covenants and obligations with detailed management controls, enforced through standard leases and estate regulations;
- d) Encouraging consolidated servicing and the use of electric vehicles with delivery guidelines;
- e) Partnership working with the Council on a variety of measures managing public realm, most recently including the successful implementation of street art fresco schemes and traffic management in Seven Dials;
- f) Annual checks on all our tenants' licences and s.178 notification of interests in respect of our licensed tenants;

These comprehensive controls, together with the robust provisions contained in draft Statement of Licensing Policy and Licensing Act 2003, will continue to safeguard the promotion of the Licensing Objectives and encourage a harmonious relationship between Camden's licensed operators and local residents. Furthermore, in an increasingly challenging climate for local high streets and the hospitality sector, the new policy will help to promote and preserve Camden's reputation as a major contributor to the UK's culture, arts, world renowned music scene, retail, dining and entertainment sectors.

Thank you for your consideration of this deputation in support of your proposals.

Yours sincerely



Andrew Hicks
Estates Director
Shaftesbury Capital