

<b>LONDON BOROUGH OF CAMDEN</b>	<b>WARDS:</b> All
<b>REPORT TITLE:</b> Review of the Statement of Licensing Policy 2025-2030	
<b>REPORT OF:</b> Director of Recreation	
<b>FOR SUBMISSION TO:</b> Licensing Committee Cabinet Council	<b>DATE:</b> 30 April 2025 16 July 2025 21 July 2025
<p><b>SUMMARY OF REPORT</b></p> <p>This report sets out details of the consultation responses to Camden’s draft Statement of Licensing Policy 2025-2030 (the Policy) at <b>Appendix 1</b> and asks Licensing Committee Members to consider and note the draft Policy and recommend it to Full Council for adoption.</p> <p><b>Local Government Act 1972 – Access to Information</b></p> <p>The following documents have been used in the preparation of this report:</p> <p>1) <a href="#">Licensing Act 2003</a>  2) Home Office <a href="#">Revised guidance issued under section 182 of Licensing Act 2003 - GOV.UK</a></p> <p><b>Contact Officer:</b>  William Sasu, Public Protection Manager  5 Pancras Square  London, N1C 4AG  Tel: 020 7974 4733  Email: <a href="mailto:william.sasu@camden.gov.uk">william.sasu@camden.gov.uk</a></p>	
<p><b>RECOMMENDATIONS</b></p> <p><b>That the Licensing Committee:</b></p> <ul style="list-style-type: none"> <li>i. Consider and note the consultation responses to the draft Statement of Licensing Policy 2025-2030; and</li> <li>ii. Recommend the draft Statement of Licensing Policy to Council for adoption.</li> </ul> <p><b>That Cabinet:</b></p> <ul style="list-style-type: none"> <li>i. Note and comment on the draft Statement of Licensing Policy 2025-2030 and the Licensing Committee’s recommendation to Council.</li> </ul>	

**That Council:**

- i. Approve and adopt the Statement of Licensing Policy 2025-2030 for publication.

Signed:



Oliver Jones

Date: 16 April 2025

## **1. Purpose of Report**

- 1.1 This report provides the Licensing Committee with the results of the public consultation undertaken on the draft Statement of Licensing Policy 2025-2030 (the draft Policy). The report also details amendments made to the draft Policy in response to the feedback received during the consultation.
- 1.2 Members are asked to consider and comment on the consultation responses and to make any further amendments to the draft Policy if considered necessary having regard to the consultation responses.
- 1.3 Members are asked to refer the draft Policy to Cabinet for consideration and Council for adoption.

## **2. Background**

- 2.1 Camden has the second highest number of licensed venues in London and these venues are a major contributor to the local economy, primarily through the Evening and Night Time Economy (ENTE). Camden's hospitality sector, including licensed venues, employs 24,000 people, accounting for about 8% of total employment in the borough. Licensed venues are not just central to Camden's economy but also play a critical role in shaping its cultural and social identity.
- 2.2 Approximately 12% of Camden's population resides within an Evening and Night Time Economy (ENTE) area, and around 50% live within a 15-minute walk. This highlights the potential for Camden's ENTE to affect the lives and well-being of its residents.
- 2.3 The Council is required to publish a Statement of Licensing Policy, setting out its approach to how it will regulate licensable activities. This helps maintain consistency, builds public confidence and assists in meeting the Council's key strategic objectives.
- 2.4 The Statement of Licensing Policy outlines how the Council will carry out its licensing functions under the Licensing Act 2003 with a view to promoting the licensing objectives:
  - The prevention of crime and disorder
  - The prevention of public nuisance
  - Public safety
  - The protection of children from harm.
- 2.5 The Policy seeks to balance the right of an individual to make a licence application for licensable activities with the right of individuals or communities to object to an application or to seek a review of an existing licence. An effective and balanced policy will help businesses to develop successfully whilst safeguarding the amenities of Camden residents and local communities.
- 2.6 The Council must determine and publish its Policy every five years, however during each five-year period, it must keep its policy under review and make revisions, as it

considers appropriate. The Council must consult on its policy and any changes made to it before approving, adopting and publishing it.

2.7 The draft Policy 2025-2030 includes several updates, additions and revisions.

2.8 The addition of:

- Pre-application Advice Service (Chapter Four, pages 28-29)
- Women's Safety (Chapter Four, pages 30-32)
- Alcohol Related Harm - drink spiking (Chapter Four, pages 32-34)
- Licensing Principles & Best Practice Guide (Chapter Seven, pages 53-54)

2.9 The revision of:

- Framework Hours (Chapter Five, pages 47-49)
- Enforcement and Monitoring of Camden's ENTE (Chapter 14, pages 78-80)
- Licence Conditions (Appendix 5, pages 93-111)

2.10 The Licensing Committee resolved on 19 November 2024 that there was not sufficient evidence of cumulative impact in the Camden Town and Seven Dials areas to require a Cumulative Impact Assessment Statement. As a consequence, these cumulative impact policy areas have been removed from the draft Policy prior to consultation.

2.11 The Licensing Committee, at the meeting held on the 19 November 2024, approved a 12-week statutory public consultation on the draft Statement of Licensing Policy 2025 -2030.

2.12 The consultation was necessary because licensing affects everyone who operate licensed premises, residents, other businesses and public authorities such as the Police. Through the consultation process the Council sought to ensure that a wide range of people could comment on the draft Policy, including licence holders, residents, businesses and statutory responsible authorities to ensure it was robust and, responsive to local needs.

2.13 The consultation was also an opportunity to ensure the draft Statement of Licensing Policy aligned with internal aspirations via policies and strategies across the Council and those of key external partners.

### **3. Consultation Process**

3.1 The consultation ran for thirteen weeks, from 17<sup>th</sup> December 2024 to 14<sup>th</sup> March 2025. This extended the statutory 12-week period by one week in recognition of the festive period.

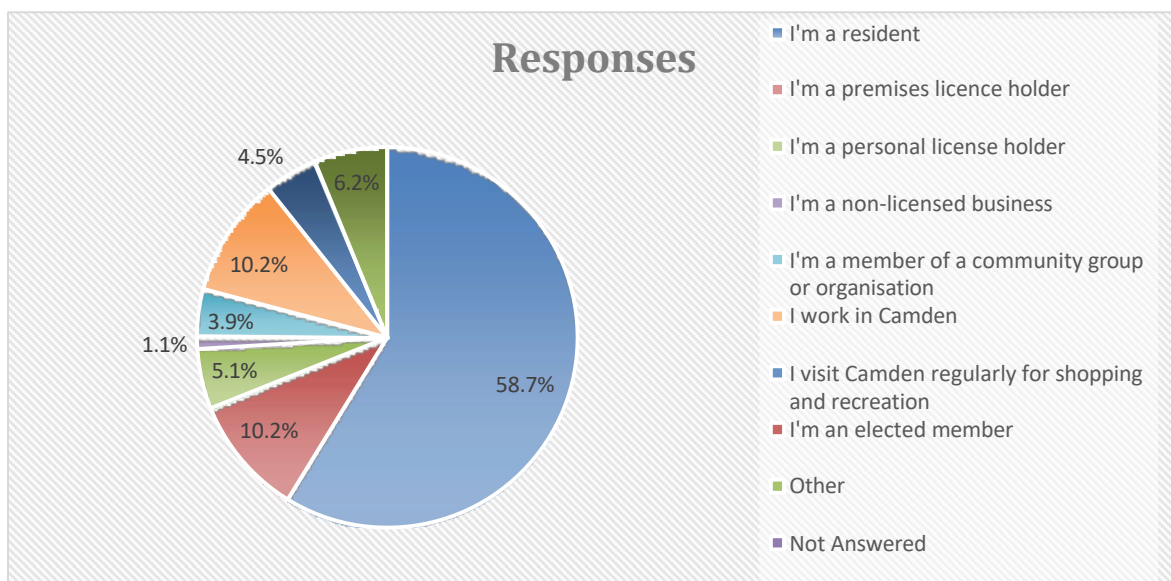
3.2 The consultation, together with details of the proposed draft Policy revisions and changes, were shared on the consultation pages of the Council's website.

3.3 The consultation was publicised in the following ways:

- A press release was issued to launch the consultation.
- E-newsletters – Camden e-newsletter, business e-newsletter and the Community Partnership newsletter.
- A link to the consultation was on the Council's website throughout the consultation period.
- An email or letter was sent to all statutory consultees.
- An email or letter was sent to all 1,950 licence holders.
- Meetings with Camden's Inner London Licensing Association (CILLA).
- Social media posts on X, Facebook and Next-door (from 13 December to 12 March), including a Facebook advert.
- Posters in Libraries across the borough, community noticeboards. licensed premises. A copy of the poster is attached in **Appendix 2**.
- All officers within Public Protection added the consultation link to their email during the consultation period.

#### 4. Summary of consultation responses

4.1 The consultation received a total of 188 responses, 177 through the online survey and 11 email responses. Responses were received from 106 residents, 5 community groups and 77 from representatives of trade groups and licensed premises and their employees or visitors.



4.2 All consultation responses received have been considered in the preparation of this report and the final draft Statement of Licensing Policy. The responses on the draft Policy were broadly positive and highlighted the number of key themes. A detailed summary of consultation responses can be found at **Appendix 2**.

#### 5. Key Themes from Consultation Feedback

5.1 The feedback received from the consultation highlighted several key themes and areas of concern. These have been grouped mainly under the four statutory licensing

objectives set out in the Licensing Act 2003, and the theme balancing economic and community interests:

- the prevention of crime and disorder
- the prevention of public nuisance
- public safety
- the protection of children from harm and
- balancing economic and community interests.

## 5.2 **Prevention of Crime and Disorder**

### **Women's Safety**

- 5.2.1 51% of respondents expressed support for the adoption of the Women's Night Safety Charter, considering it an important step toward improving safety. Some respondents acknowledge that raising awareness and setting safety expectations for licensed premises is beneficial and believe more concrete action is needed beyond policy commitments, such as mandatory training for venue staff and enforcement of safety standards.

### **Drink Spiking**

- 5.2.2 51% of respondents agreed that the measures outlined in the draft policy adequately address drink spiking. Comments related to this question suggest that training for bar staff and security personnel should be compulsory.

## 5.3 **Public Nuisance**

### **Monitoring and enforcement**

- 5.3.1 45% of respondents agreed that Camden's approach to monitoring and enforcement as outlined in the draft policy is adequate. A number of respondents highlighted the importance of enforcement, noting that licensing conditions must be strictly monitored to ensure compliance. Some respondents stated that venues should be held accountable for implementing safety measures, and there should be clear penalties for non-compliance.

### **Model Conditions**

- 5.3.2 42% of respondents believe the model conditions provide useful guidance for applicants and help standardize expectations. A few note that clearer conditions make the application process easier.

- 5.3.3 Some respondents also mentioned that certain conditions need to be better explained to avoid confusion, and that the policy should provide clearer examples of how conditions should be implemented.

## 5.4 **Public Safety**

### **Accessibility**

- 5.4.1 45% of respondents agreed that the draft policy promotes accessibility. Many commented and agreed with the policy's intent and appreciate that accessibility is being addressed. There were some suggestions around the importance of consulting disabled individuals and advocacy groups in shaping accessibility policies and requiring venues to provide ramps, accessible seating, clear signage,

and disabled toilets.

## 5.5 **Protection of Children from Harm**

- 5.5.1 42% of respondents agreed with the model conditions which highlights the need for robust age verification policies and stricter penalties for underage sales. Some respondents suggested additional training for staff on safeguarding and age verification.

## 5.6 **Balancing Economic and Community Interests**

### **Pre-Application Advice Service**

- 5.6.1 46% of respondents agreed that structured dialogue and early engagement with local communities and responsible authorities as part of the pre-application process can help address potential issues before applications are submitted and improve the licensing process.

### **Inclusivity**

- 5.6.2 48% of respondents agreed that the draft policy promotes inclusivity and suggested that more public awareness campaigns and education initiatives should be undertaken to promote greater inclusivity.

### **Policy Alignment with Business and Community Interest**

- 5.6.3 53% of respondents agreed that the draft policy balances the interests of residents, businesses and visitors. The draft policy provides a positive boost for businesses and customers and underlines the importance of a vibrant night-time economy as a driver for employment, cultural exchange and overall economic growth.

- 5.6.4 However, 37% of respondents, expressed concerns about possible increase in noise, late-night disturbances, and anti-social behaviour that will affect their quality of life.

### **Framework Hours**

- 5.6.5 A balanced approach was recommended to support the night-time economy while protecting residential areas. 59% of respondents, expressed that extending the framework hours by 30 minutes would undermine balancing business interests and community needs. Further the extension would lead to increased noise, late-night disturbances, and anti-social behaviour.

- 5.6.6 By contrast, 31% of respondents support the proposed extension, stating that it balances the interests of businesses and the night-time economy, helps businesses to recover financially post-pandemic and enhance Camden's reputation as a nightlife destination.

## 6. **Further changes proposed to the draft Statement of Licensing Policy**

- 6.1 In view of the consultation responses, and those from the Police, community groups and residents, further changes are proposed to the draft Statement of Licensing Policy. It is proposed that these additional measures when viewed with the policy, address the concerns raised and will mitigate any issues concerning licensed

premises were they to arise. These additional changes are summarised below and are outlined in detail at **Appendix 3**.

#### **Model Conditions (Appendix 5, Pages 93-111)**

- 6.2 The model conditions have been revised following feedback from stakeholders including the Police and community groups. The revised conditions using an issue specific approach enhances, clarifies and simplifies the process for applicants when selecting conditions to be included in their operating schedule. Additionally, this provides greater transparency for licensing panels and responsible authorities, enabling them to address specific operational concerns more effectively.

#### **Risk Assessment (Chapter 4, Pages 27-28)**

- 6.3 A revised section on the requirement for a risk assessment has been reintroduced to the draft Policy following consultation with the Police and other stakeholders. This is considered necessary to support the introduction of the extension of the framework hours and the revised Model Conditions.

#### **Framework Hours (Chapter 5, Page 47)**

- 6.4 The consultation responses highlight residents' concerns regarding any extension of framework hours, and the lack of a requirement for applicants to implement additional measures to address operational issues during extended hours of operation. To address this, the wording in paragraph 5.8 has been revised to ensure that applicants assess potential risks and proactively include appropriate conditions to mitigate them. This reinforces their responsibility to uphold the licensing objectives, with a strong focus on preventing crime and disorder, and public nuisance.

#### **Dispersal Policies (Appendix 3, Pages 85-88)**

- 6.5 The consultation responses highlighted concerns about ineffective or outdated dispersal policies. To address this the draft Policy has been updated to introduce a requirement to review dispersal policies whenever recurring issues related to the dispersal of customers arise. This ensures that dispersal policies remain effective, responsive, and aligned with best practices to minimise disruption and maintain public order.

#### **Women's Safety (Chapter 4, Pages 30-32)**

- 6.6 Having regard to consultation responses paragraph 4.32 of the draft Policy has been amended to set a clear expectation for applicants to complete WAVE training and implement the 'Ask for Angela' scheme or a similar initiative. Additionally, a new, specific condition reflecting this requirement has been incorporated into the revised Model Conditions.

#### **Psychoactive Substances (Chapter 4, Page 35)**

- 6.7 In collaboration with Public Health, and to encourage venues to take a proactive approach in preventing drug use on their premises, paragraph 4.44 of the draft Policy has been revised. The amendment sets a clear expectation for applicants to assess the risks associated with psychoactive substances at their venue and implement appropriate measures to mitigate these risks effectively.



## 7. Next Steps

Activity	Date
Licensing Committee to consider and recommend the draft Policy is adopted by Council.	30 April 2025
Cabinet to consider the draft policy.	16 July 2025
Council to adopt the draft policy.	21 July 2025
Statement of Licensing Policy 2025 – 2030 published.	25 July 2025

## 8. Finance Comments of the Executive Director of Corporate Services

8.1. There are no material financial implications concerning this report. The Director of Finance has been consulted in the preparation of this report and has no further comments to add.

## 9. Legal Comments of the Borough Solicitor

9.1. The Borough Solicitor has been consulted, and legal comments have been incorporated in this report.

9.2. Before determining its Policy, the licensing authority must consult the persons listed in section 5(3) of the 2003 Act. These are:

- a) the chief officer of police for the area
- b) the fire and rescue authority for the area
- c) each local authority's Director of Public Health in England or Local Health Board in Wales for an area any part of which is in the licensing authority's area
- d) persons/bodies representative of local premises licence holders
- e) persons/bodies representative of local club premises certificate holders
- f) persons/bodies representative of local personal licence holders and
- g) persons/bodies representative of businesses and residents in its area

9.3. The views of all these persons or bodies should be given appropriate weight when the Policy is determined.

9.4. The Policy is a non-statutory licensing policy. It provides a set of presumptions and guidelines for the determination of individual cases, but each case will still be decided on its merits.

9.5. However, it is considered helpful to have a Policy to promote certainty amongst local residents and businesses and consistency of decision making.

9.6. Before it approves and adopts its Policy, the views of all those who have responded to the consultations should be given appropriate weight when the Policy is determined.

9.7. When formulating Policy local authorities must have regard to the **Equality Act 2010**.

The Act provides protection from discrimination in respect of certain protected characteristics, namely: age, disability, gender reassignment, pregnancy and maternity, race, religion or beliefs and sex and sexual orientation. It places the Council under a legal duty to have due regard to the advancement of equality in the exercise of its powers including licensing powers.

### **The section 149 Public Sector Equality Duty**

- (1) A public authority must, in the exercise of its functions, have due regard to the need to:
  - (a) Eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act
  - (b) Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it
  - (c) Foster good relations between persons who share a relevant protected characteristic and persons who do not share it.
- (2) A person who is not a public authority but who exercises public functions must, in the exercise of those functions, have due regard to the matters mentioned in subsection (1).
- (3) Having due regard to the need to advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it involves having due regard, in particular, to the need to:
  - (a) Remove or minimise disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic
  - (b) Take steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it
  - (c) Encourage persons who share a relevant protected characteristic to participate in public life or in any other activity in which participation by such persons is disproportionately low.
- (4) The steps involved in meeting the needs of disabled persons that are different from the needs of persons who are not disabled include, in particular, steps to take account of disabled persons' disabilities.
- (5) Having due regard to the need to foster good relations between persons who share a relevant protected characteristic and persons who do not share it involves having due regard, in particular, to the need to:
  - (a) Tackle prejudice, and
  - (b) Promote understanding.
- (6) Compliance with the duties in this section may involve treating some persons more favourably than others; but that is not to be taken as permitting conduct that would otherwise be prohibited by or under this Act.

- 9.8. In determining any Policy, the Council must comply with the public sector equality duty in s.149 of the 2010 Act. This is a duty to have regard to the need to achieve the statutory goals of s.149, rather than to achieve a particular result. The s149 duty sits alongside and does not override statutory requirements in relation to determining this Policy.
- 9.9. When Members have before them material on issues relevant to s149, such material must be specifically assessed in the context of s149. However, because s149 creates a requirement to “have regard” the fact a matter raised is relevant to s149 will not automatically translate into a reason for refusing an application that would be sustainable in any subsequent appeal, given the legal requirement to determine applications in compliance with legislation.

## **10. Environmental Implications**

- 10.1. There are no environmental implications arising from the proposals within the report.

## **11. Equalities Impact Assessment**

- 11.1. An Equalities Impact Assessment (EIA) has been produced on 15 April 2025 following the proposed changes made to the Policy. The assessment undertaken is available for review in **Appendix 5**.
- 11.2. The EIA has not identified that the Policy will adversely affect the holders of existing premises licences, those applying to hold licences, Responsible Authorities under the Licensing Act 2003, Council officers, and existing and potential residents of the borough.
- 11.3. The Policy will have a positive impact by aligning with the priorities of the Council including, but not limited to, promoting fairness and equality and promoting better health. The EIA identified no negative impacts on those with protected characteristics relating to age, disability, health, sex and socio-economic status.

## **12. Appendices**

- Appendix 1 – Proposed Draft Statement of Licensing Policy
- Appendix 2 – Summary of Consultation Responses
- Appendix 3 – Schedule of Proposed Changes
- Appendix 4 – Consultation Responses
- Appendix 5 – Equalities Impact Assessment

**REPORT ENDS**