



Havering
LONDON BOROUGH

Consultation Summary Report Statement of Licensing Policy 2021-2026

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1. Introduction

Under the Licensing Act 2003, councils must produce a Statement of Licensing Policy at least every five years. Licensing in this case means alcohol, most forms of public entertainment, club premises and late-night refreshment (food served anytime after 11pm and before 5am). It also includes Temporary Events Notices (TENs) which can be applied for by licensed venues, other businesses and members of the public.

There are approximately 600 licensed premises across the borough of Havering. The Council ran this consultation because the Licensing Policy affects everyone who operates a licensed premise, residents, other businesses and public authorities such as the Police. Because of this the Council wanted to ensure that a wide range of people could comment on the Policy, so changes could be made to the final document that make it more robust, responsive to local views and clearer to understand.

There were several updates to the previous version of the policy which the consultation specifically asked for feedback on. These were:

The addition of:

- Havering's vision
- An equalities and diversity section
- A section on mental health
- A section on counter terrorism
- Some additional model conditions on staff training and product size/alcohol content
- A section on the use of remote hearings
- A section on COVID-19 risk assessments

Reviews of the cumulative impact zones

- Romford has been reviewed and the proposal was for it to remain unchanged
- Hornchurch has been reviewed and the proposal was to reduce its size
- Gooshays ward has been reviewed and the proposal was to apply the policy to off sales premises only

The London Borough of Havering must publish an updated Statement of Licensing Policy by January 2021. This consultation was on the draft version of the Council's updated Policy and the research that informed it. The consultation ran for 12 weeks, opening on 17th August and closing on 9th November 2020.

The consultation took place during extremely challenging times for Havering and indeed the whole of the UK. License holders, particularly pubs, bars, restaurants, clubs and events have been particularly affected. The social distancing measures brought in to combat the COVID-19 pandemic have meant that businesses have had to work hard to reconfigure the way they operate and indeed close their doors

completely to comply with regulations that changed to respond to the increased reproduction rate of the virus as the colder weather of autumn 2020 arrived.

The consultation received a total of 30 responses from 19 residents, 4 representatives of a licensed premise/trade group (one responded twice), 3 business owners, 2 other/not declared and 1 council officer. 29 responses were received via the online survey and 1 via email. This report summarises their responses and will inform the Council's Statement of Licensing Policy for 2021-2026.

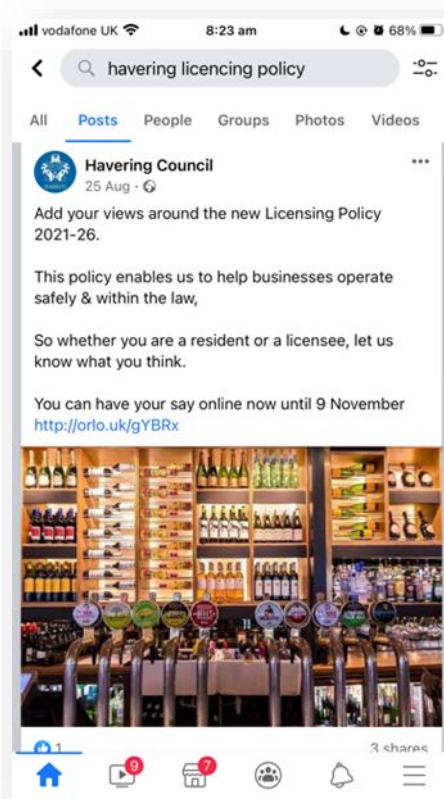
2. Consultation Activity

The consultation was open for twelve weeks, opening on 17th August and closing on 9th November 2020. This time period was chosen in recognition of the challenges facing licensed businesses and the entire borough during the COVID-19 pandemic.

The Council's proposed updates to the Statement of Licensing Policy were shared on the consultation pages of the Council's website. Responses to the proposals were invited via an online survey and through individual written reply by letter or email.

The consultation was publicised in the following ways:

- A press release was issued to launch the consultation
- The link to the consultation has been on the Local Authority website throughout the consultation period.
- An email or letter was sent to all of the consultees listed in Appendix A of the Draft Statement of Licensing Policy.
- An email or letter was sent to all license holders
- An email or letter was sent to all residents who had previously contacted the council in relation to licensed premises
- In 4 editions of the *Living in Havering* email bulletin.
- At the online meetings of Pubwatch and Safe & Sound in September and October 2020
- Social Media Posts- Across Twitter and Facebook, shared a total of 18 times.
- Posters up in all Libraries across the borough and on community noticeboards in Tesco's in: Rainham, Hornchurch, Harold Hill and Wilko in Romford



! Tweet to promote the consultation

- All officers within Public Protection added the consultation link to their email footers during the consultation period.

3. Summary of consultation responses

This section of the report summarises the 29 responses received by the online survey and the one response received by email.

3.1 Are the proposed updates consistent with the objectives of the Licensing Policy?

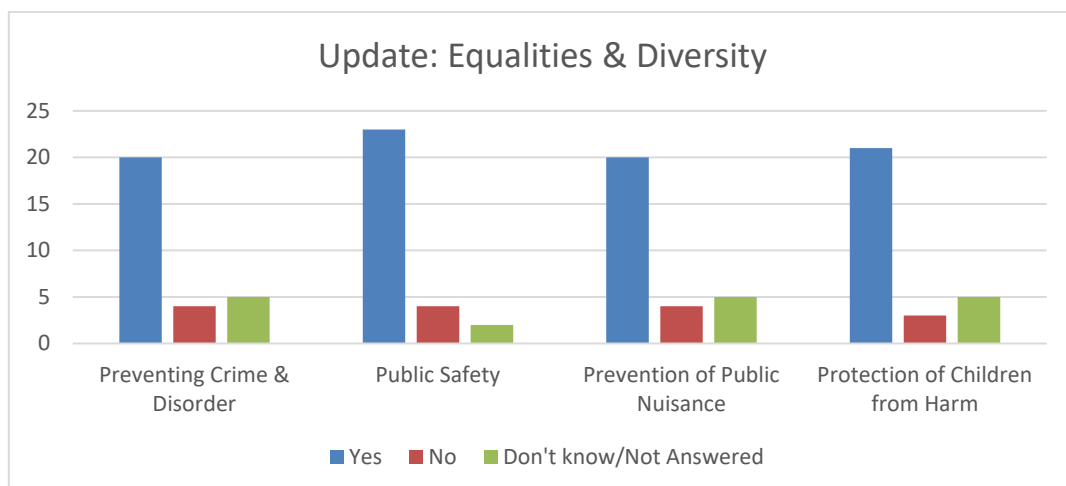
The consultation began by asking if the proposed updates to the Statement of Licensing Policy are consistent with its objectives of:

- Preventing Crime and Disorder
- Public Safety
- Prevention of Public Nuisance
- Protection of Children from Harm

Equalities & Diversity

The updated Licensing Policy proposes (in section 3.11) to include provisions that help ensure license holders “run their venues in an inclusive manner. It is recommended that licensees make themselves familiar with the requirements of the Equality Act 2010 for the access and provision of services for persons within the protected groups identified by the legislation.” Most respondents, as seen in the chart below, believed that this update was in line with Licensing Policy’s objectives.

“Ensuring that venues are inclusive and deal appropriately with breaches of equality and diversity law should ensure that there is less tolerance of negative behaviour, provide safe and welcoming environments for all, and reduce the number of situations where things escalate to levels of nuisance or crime.” Respondent



Of the thirty responses to the consultation, there were seven comments on the addition of the Equalities & Diversity provision. One business owner called for training of license holders to help fulfil the aims of the Equalities & Diversity provisions. While a resident thought there were too many policies being put in place and that the root cause of problems, in their view, was the 24-7 availability of alcohol.

One resident said that when referring to disability in the Licensing Policy, the fact that disabilities can be visible or not visible should be included in the wording. Another said they thought not enough was being done to include people with disabilities in social situations.

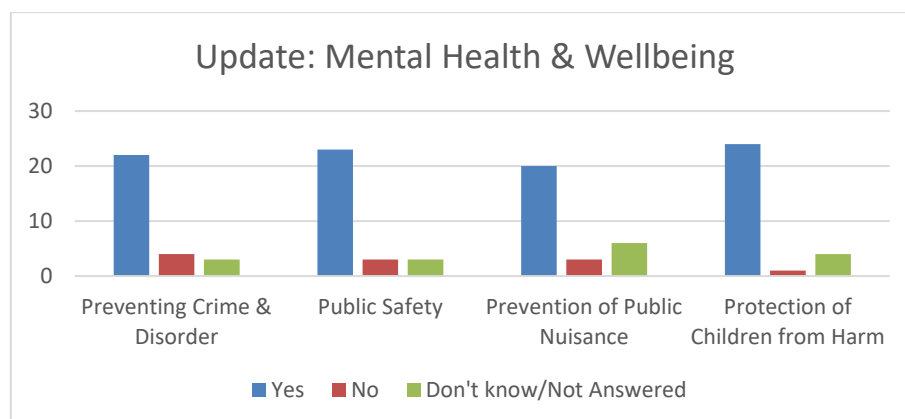
Mental Health & Wellbeing

As outlined in section 23.3 of the proposed updated Licensing Policy: “Licensed premises often have regular and repeat customers who, over time, may demonstrate behaviour that might suggest they have care and support needs. Havering’s Licensing Authority does not expect all staff members on licensed premises to have expert knowledge with regard to assessing the mental health of its customers. The Licensing Authority does expect, however, that an application for a premises licence should acknowledge this duty and provide positive proposals further to assessing the general wellbeing of its customers.”

Again, most respondents, as the chart below shows, agreed that including Mental Health & Wellbeing provisions in the updated Licensing Policy is in line with its objectives. Four respondents commented on this update. One respondent emphasised their support by saying that some vulnerable people use pubs as a place to find support, particularly if they lack family or friends. A business owner called for training to help license holders:

“I do feel that there should be assistance from Havering Council in signposting free training, or providing ‘train the trainer’ support to current and new licensees to ensure the quality of training - and for a better connection to venues from social services - so that customers who have problems that licensees aren’t able to support due to not having enhanced training can be supported by those who are qualified.”

Business owner



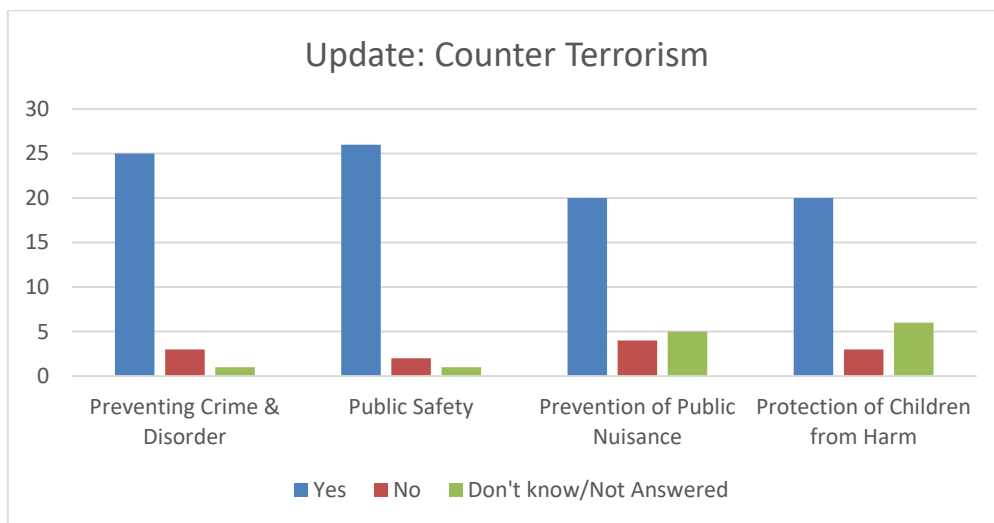
One respondent said that they thought there were too many premises willing to sell alcohol to underage young people and that the Council was too liberal with its granting of licenses.

Counter Terrorism

The proposed updated Licensing Policy includes a new section on counter terrorism. Section 26 states: “The Licensing Authority expects applicants to have protective security plans that demonstrate how they will manage the threat from a terrorist attack. This is particularly important for venues that operate as part of the night-time economy. As part of these plans the Licensing Authority expects applicants to have training in place for its staff in relation to counter terrorism.”

The chart below shows that most of the thirty responses thought that this addition is in line with the Licensing Policy’s objectives. Of the five comments, one said they thought the addition timely given the court case on the Manchester Arena bombing underway at the time. Another said they supported it because:

“Given the number of people who regularly go out in Havering, this is another worthy change to the policy. Whilst the main duty to deal with terrorism lies with the government and police services, all venues should be aware of the very real threat and have plans in place to respond with surprise attacks.” Respondent



A business owner suggested that the Safe & Sound Group (a partnership between Havering Council, the Met Police and Street Pastors) should be extended to other areas of the borough. They also suggested that because they believed that restaurants were a less likely terrorist target than other locations, not as much training was needed for that type of licensed premise.

Model conditions: Staff Competence and Training and Controls for Sales of Alcohol

Conditions attached to a licence or certificate are steps or actions the holder of the premises licence or club premises certificate will be required to take, or refrain from taking, at all times when licensable activities are taking place at the premises in question. The proposed update to this Licensing Policy includes provisions for staff training and controls for the sale of alcohol.

Among the conditions for staff competence and training is this (section PC07): “the Licensee to ensure that each member of staff authorised to sell alcohol has received adequate training on the law with regard to age restricted products and that this has been properly documented and training records kept. The training record to be kept on the licensed premises and made available for inspection by the Licensing Officer, Trading Standards or the Police.”

The Council proposes to add the following controls for the sale of alcohol:

- GC08 Beers, lagers, stout and ciders sold at the premises should not exceed (insert e.g. 5.0 or 5.5 or 6%) alcohol volume.
- GC09 Sprits should not be sold in bottles of less than 35cl/70cl.
- GC10 Beers, lagers, stout, ciders and alcohol pops shall be sold in packs of no less than four

Most respondents agreed that these additions uphold the Licensing Policy's objectives:



Four respondents commented on this update. One resident said that false ID was too readily available in the borough, whilst another said that that licensees should

take responsibility for the welfare of their customers and not serve them when the customers are showing signs of intoxication.

On the subject of controls for sales of alcohol one respondent commented in support of the quantities update:

“It makes sense to highlight the smaller quantity amounts and make them available in all premises.” Business Owner

3.2 Remote License Hearings

The COVID-19 pandemic has made the use of remote license hearing necessary. Section 5.6 of the Licensing Policy makes clear that these hearings “shall still take place in public.”

Of the five respondents who commented on this addition, most thought it was a sensible provision given the circumstances. One resident asked that hearings still be heard face to face where possible, while a representative of a license holder said that they be heard “live” so that all interested parties could contribute. Another resident questioned what evidence would be required by these remote hearings.

3.3 COVID-19 Risk Assessment

Section 30 is a proposed addition to the Licensing Policy that requires license holders to carry out a COVID-19 risk assessment, following guidance on the gov.uk website.

Of the five respondents who commented on this addition, most supported its inclusion, saying it was a sensible measure given the current circumstances. One resident questioned how nightclubs could comply with this provision. Another said that they believed that Hornchurch pubs were not following social distancing rules and observed that:

“the queuing public are not socially distanced and are not wearing face coverings. This needs to be addressed.” Resident

3.4: Cumulative Impact Policies: Romford Town Centre, Hornchurch Town and Gooshays

A Cumulative Impact Area is a designated zone (CIZ) where evidence has indicated that the number, type or density of licensed premises is impacting adversely on the licensing objectives: preventing crime and disorder, public safety, prevention of public nuisance and the protection of children from harm. The consultation asked for views on three Cumulative impact zones: Romford Town Centre, Hornchurch Town and Gooshays.

Romford Town Cumulative Impact Zone: unchanged

Of the thirty consultation responses, ten respondents commented on the proposal not to change the Romford Town CIZ.

Of the eight residents who responded, most argued for stricter controls, such as shorter licensed hours such as a 1.30am or 2.00am closing time. One wanted to the council to actively reduce the number of licensed premises by only renewing the licenses of those premises who demonstrated that they have been actively managing the behaviour of their customers. One resident also argued for the CIZ to be applied across the entire borough, because they said:

“Many of these late night premises are a curse on our society. Many are unruly, they are not needed. Any financial benefit they may give to Havering is negated by the cost of policing the Borough.”

Resident



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II Romford Town Cumulative Impact Zone

In contrast, one resident said they did not believe that refusing licenses was the right approach to managing the area.

License holders were largely supportive of the CIZ in their comments, but one wanted to see some provisions made that would help small businesses during the harsh trading conditions caused by COVID-19.

“I support the RTC CIZ in principal but consider that bona fide restaurants within policy hours should remain exempt but also that small capacity bars, tap rooms etc should also be exempt in framework hours. The policy should apply in full to off licences outside of framework hours. LNR’s should be considered pragmatically.”

Representative of Licensed Premise

Hornchurch Town Cumulative Impact Zone: proposal to reduce its size

The proposed size of the Hornchurch Town cumulative impact zone is to be reduced from the previous Licensing Policy and rather than cover all of the St Andrews ward it would be focussed on Hornchurch Town Centre. The reduced zone would cover the High Street, Station Lane, Billet Lane, North Street and part of Upminster Road.

Nine respondents commented on the proposal to reduce the size of the Hornchurch Town CIZ.

Three of the eight residents who commented objected to the proposed reduction in size of the CIZ. Their reasons included:

- A zone designed to protect residents should not be reduced
- The levels anti-social behaviour in the surrounding streets



III Hornchurch Town Cumulative Impact Zone

“As a resident of Hornchurch, Billet Lane we are consistently subjected on Thursday, Friday, Saturday and Sunday nights. Patrons intoxicated walking home shouting and fighting in the street disturbing sleep, leaving litter glasses/food waste in our front gardens, urination alongside of Emerson drive near electric box, cars speeding and playing loud music as exiting Hornchurch.”
Resident

Those residents called for more protection for residents rather than any reduction, with some asking the Council to reduce the number of licensed premises in the area or to spread the CIZ across other parts of Havering.

Other residents and license holders who commented welcomed the protection that the CIZ gave and one supported the rationale for its reduction. One resident repeated their belief that refusing licenses was not the best approach.

Gooshays Ward Cumulative Impact Zone: proposal to apply the policy to off sales premises only

As this area of Havering does not house a night-time economy environment it is important to understand why this area ranks high in the number of incidents. It also shows as a hotspot in London Ambulance assault data. A hypothesis is that this area is one of Havering's areas which has the lowest deprivation index and thus this has an impact of the level of violent crime experienced in this area

One hot spot was identified within the Gooshays ward where incidents appeared linked to licensed premises. This was the Farnham Road/ Hilldene Avenue where a number of assaults were reported within licensed retail establishments. None of the premises identified in the report relate to on sales or late night refreshment and therefore the proposed cumulative impact policy for the Gooshays area is restricted to off sale premises only.

Four respondents commented on the proposal for Gooshays CIZ. Most welcomed its targeted approach, with one respondent calling for more support for the emergency services.



IV Gooshays Ward Cumulative Impact Zone

3.5 Is the Statement of Licensing Policy generally clear?

Twenty five of the thirty consultation respondents thought that the Licensing Policy for 2021-2026 was generally clear.

Of the five respondents who gave comments, two said they thought the policy was either vague or too full of jargon. Two respondents gave specific points of clarification. These are detailed in Section 4 below. Another respondent said that policies are all well and good, but that the Council's focus should be on their enforcement.

“It is time it was enforced, no point or good making policies that are not carried out e.g. many establishments serving to under-age. Large groups of adults in town centres spilling out onto pavements after drinking sessions.” Resident

3.6 Striking the right balance between allowing licensed premises to operate/invest and ensuring the community is protected

Just over half of all respondents agreed that the Licensing Policy struck the right balance between allowing licensed premises to operate/invest and ensuring the community is protected whilst just over a third disagreed.

The comments on this question included:

Noise:

- Concerns that the Council does not do enough to protect residents from noise associated with licensed premises
- The protections against noise as a public nuisance are weaker than other London Councils, such as the City of London

Management of Anti-Social Behaviour:

- Some premises not adhering to entry exit rules, not having door staff on duty, allowing glasses and bottles to be consumed on the street.
- Under age groups rejected from premises allowed to congregate on the street.
- Regular drug dealing observed on street around railway station.
- Not able to get CCTV as many Cameras not working and out of service contract for repair.
- Good points McDonalds closes 11pm helps to prevent congregating groups after venue closure.
- Other cities venues contribute to cost of policing etc for each hour open later than

One respondent felt that the Licensing Policy did not offer the necessary protection for residents and the number of licensed premises should be reduced. Whilst another respondent called for support for licensed premises to allow them and the economy to thrive during the challenges caused by COVID-19.

3.7 Final comments

Eight respondents took the opportunity to share final comments on the proposed Statement of Licensing Policy.

Five of the respondents were residents and all expressed the concern that the policy does not go far enough to tackle problems such as noise and anti-social behaviour.

One respondent linked the spread of COVID-19 with people socialising and drinking alcohol.

“I do not think it goes far enough to protect mental health, equality, protection of children, or diversity, alcohol has certainly added to the spreading of COVID-19 19 people meeting up drinking and then creating social problems because they are under the influence of alcohol.” Resident

License holders/representatives and others who commented felt the Licensing Policy was fair and clear, with one restating their request that the new provisions be supported by training for staff.

“Overall, the policy is clear, makes sense and will improve things across the borough, but it must be implemented hand in hand with health and social care policies to ensure that the route causes of problem drinking and associated violent behaviours are addressed.” Respondent

4. Council's response to key issues raised by respondents

Individual/ Organisation	Consultation Representation	Response
Principles on Equalities & Diversity		
Resident	Not enough is done to include the disabled socially.	The Policy has been updated and a section on equality and diversity has been expanded. There is an expectation that venues will operate inclusively and make reasonable adjustments as required by the Equality Act 2010.
Representative of licensed premise	The Equalities Act must be taken into account in all aspects of public life to ensure an inclusive society.	The Policy has been updated and a section on equality and diversity has been expanded. There is an expectation that venues will operate inclusively and make reasonable adjustments as required by the Equality Act 2010.
Licensee	There has never been any judging on how people are at this off licence	Comment has been noted but this comment does not impact the contents of the policy.
Business Owner	With training in equality and diversity, license holders will be more aware of how to manage ant-social disputes that could be race or culture or disability related - ultimately allowing the licensee to be able to make a much fairer judgement on resolve - protecting dignity of its customers and safety to those who may be under attack verbally or physically due to no fault of their own.	The authority can consider more training and signposting. This is not however a matter for the licensing policy to address.
Resident	Feel that too many policies are being made. All the above are common sense the main problem now days is alcohol etc can be purchased all day and all night seven days a week and many premises do not check age.	It is a legal requirement under the Licensing Act 2003 that each Local Authority adopts a policy statement. The policy does promote recommended hours depending on each

		<p>category of licensed premises. There are also pool of model conditions which include age verification and the promotion of a challenge 25 scheme.</p> <p>There are also sections within the policy which address children and licensed premises, specifically in relation to the sale of alcohol.</p>
Resident	<p>I feel the reference to disability should have added....seen or unseen... or visible or not visible.....or something like that</p>	<p>Thank you for comment. We have updated paragraph 3.16 with the following wording:</p> <p><i>3.16 Under section 20 of the Equality Act 2010 operators of licensed business such as pubs, bars, nightclubs and restaurants are also required to make reasonable adjustments to ensure that their premises are accessible to disabled people. A failure to do so will also amount to discrimination. It should be noted that not all disabilities are visible and not immediately obvious such as learning difficulties, mental health, speech, visual or hearing impairments.</i></p>
NA	<p>Ensuring that venues are inclusive and deal appropriately with breaches of equality and diversity law should ensure that there is less tolerance of negative behaviour, provide safe and welcoming environments for all, and reduce the number of situations where things escalate to levels of nuisance or crime.</p>	<p>The Policy has been updated and a section on equality and diversity has been expanded. There is an expectation that venues will operate inclusively and make reasonable adjustments as required by the Equality Act 2010.</p>

Principles on Mental Health & Wellbeing		
Licensee	There has never been anyone that came to this store for this	Comment has been noted but this comment does not impact the contents of the policy.
Business Owner	<p>Ensuring a pleasurable experience in a venue doesn't turn into an unhealthy addiction is very important - and ensuring that vulnerable people do not succumb to addiction.</p> <p>However again I do feel that there should be assistance from Havering Council in signposting free training, or providing 'train the trainer' support to current and new licensees to ensure the quality of training - and for a better connection to venues from social services - so that customers who have problems that licensees aren't able to support due to not having enhanced training can be supported by those who are qualified.</p>	<p>The revised policy does contain a section on mental health and wellbeing.</p> <p>Whilst the comment has been noted, it is the responsibility of the operator to ensure that members of staff are adequately trained for their role.</p> <p>The provision of training can be considered but is not a matter for inclusion in the policy.</p>
Resident	<p>In most cases any well run business would promote these actions amongst their staff.</p> <p>However there are still many places that are willing to serve to under age etc just to take the money, that is because too many places have now been given alcohol licenses. The blame there lies with those that freely give out these licenses.</p>	<p>If there are specific concerns that relate to individual premises, these can be reported to the Local Authority for investigation.</p> <p>The policy framework and licence regime including a statutory consultation period where interested parties can raise any relevant concerns.</p>
NA	I think this is a really worthy addition to the policy; whilst many may be more concerned about getting people to spend money, they should recognise that they are in a key position to support people with additional care needs. Many vulnerable people may lack adequate support networks and pubs make up for that. However, this comes with its own issues as people may become dependent on alcohol, could be neglecting other aspects of their life, or may get involved with other people who could exploit them.	Comment has been noted, this comment does not require an amendment to the draft policy.

	Staff in this area should be able to spot when people are at risk and should feel empowered to raise their concerns. This policy change explicitly encourages this and provides them the means to do so.	
Counter Terrorism		
Representative of licensed premise	Particularly relevant during the Manchester Arena Inquiry.	Comment has been noted, this comment does not require an amendment to the draft policy.
Licensee	There has not been a terrorist attack in this off licence	Comment has been noted, this comment does not require an amendment to the draft policy.
NA	Given the number of people who regularly go out in Havering, this is another worthy change to the policy. Whilst the main duty to deal with terrorism lies with the government and police services, all venues should be aware of the very real threat and have plans in place to respond with surprise attacks.	Comment has been noted, this comment does not require an amendment to the draft policy.
Resident	Children should not be in these places and parental control should be encouraged by advertising etc.	Each application is considered on its own merits. The policy has provisions in place that deal with children on licensed premises and the control measures that should be in place. A blanket ban on children would be considered unlawful.
Business Owner	Venues such as pubs and clubs often run parallel with condensed areas of members of the public which is a prime target for terrorism response. Perhaps the Safe & Sound group in Romford town centre can be duplicated in other areas of the borough to support this? We have had very good	The authority can consider additional safe & sound groups throughout the borough, however, it is not a matter for the licensing policy to address.

	<p>experiences working along the Safe & Sound group for a number of years.</p> <p>Perhaps with regard to restaurants a lesser amount of training is needed as they are slightly less risk?</p>	
Model conditions around Staff Competence and Training and Controls for Sales of Alcohol		
Resident	False ID is too available to under 18/21.	The policy identified forms of ID which are accepting in the pool of model conditions. The matter of false identification would be a matter for the police.
Licensee	When serving alcohol this business will always ask for ID	This comment has been noted, this comment does not require an amendment to the draft policy.
Business Owner	It makes sense to highlight the smaller quantity amounts and make them available in all premises.	Comment has been noted, this comment does not require an amendment to the draft policy.
Remote licensing hearings, necessitated by the corona virus pandemic		
Resident	Should still be held face to face where practicable.	The procedure is designed to enable hearings to continue during the current pandemic. It is not intended to replace face to face hearings.
Resident	Coronavirus is not going away but I do have reservations about any evidence that maybe required etc?	Protocols have been agreed to ensure hearings are fair. All information is collated into a report prior to the hearing taking place.
Representative of licensed premise	<p>A good decision to include this. Virtual Hearings are safer for all parties. I see they may continue well into the future as the virus is not going away any time soon.</p> <p>Just a thought maybe "live hearings" should be considered where there are a</p>	Live hearings may not be practical where large groups are involved due to the need to maintain adequate social distancing.

	large number of parties e.g. residents or for complicated or disputed Reviews.	
NA	Provision is sensible and should ensure hearings can continue without unnecessary disruption.	Comment has been noted, this comment does not require an amendment to the draft policy.
Representative of licensed premise	There is no real sensible alternative to remote hearings while the pandemic proceeds.	Comment has been noted, this comment does not require an amendment to the draft policy.
Covid-19 and risk assessments		
Resident	Hornchurch pubs do not follow social distancing rules. There is a significant risk of infection from these premises. Queuing public are not socially distanced and are not wearing face coverings. This needs to be addressed.	This is not a matter that can be addressed by this policy. Specific concerns should be reported to the Local Authority via the Council website.
Resident	Adequate safety is prime concern but not sure how this could be applied in a nightclub!?	This is not a matter that can be addressed by this policy. Under current Government restrictions, Nightclubs are not permitted to open. All premises that do open are legally required to have A Covid secure risk assessment in place.
Representative of licensed premise	Clear and relevant advice.	Comment has been noted, this comment does not require an amendment to the draft policy.
Resident	All premises serving the public must take full responsibility for public health and safety	Comment has been noted, this comment does not require an amendment to the draft policy.
NA	Sensible amendment based on current circumstances. It may be prudent to make this vaguer to cover any future pandemic, but by being explicit there is no room for ignoring it.	The comment has been noted but this section was added specifically to address COVID 19.

Cumulative impact policy for Romford Town Centre: Retain		
Resident	Would prefer they cease trading before 4am	The policy hours do not support applications past 2am, however each application is judged on its own merits.
Resident	Need to reduce the number of licences premises not just restrict the number of new licences. This is an awful place to go and the crime figures show why. As far as I'm concerned Romford is a 'no go area' at night. I do not even like going there during the day due to the behaviour of people. I have told my children to avoid the area, as I'm concerned for their welfare.	The purpose of the policy is not to reduce the number of licensed premises. It is designed to encourage quality applications that will not add to the cumulative impact of licensed premises.
Resident	We need to support our emergency services especially given how stretched they are in these times.	Comment has been noted, this comment does not require an amendment to the draft policy.
Representative of licensed premise	Romford TC CIZ is still justified.	Comment has been noted, this comment does not require an amendment to the draft policy.
Resident	<p>Area licences premises (late opened pubs/nightclubs) promote excessive drinking (happy hours etc) that causes anti-social behaviour and regularly disturbs residents living in the flats above- being a South St resident myself, I've witnessed drunken people peeing by the banks, throwing orange road cones after 3am, having a fight or shouting at hours when most are trying to sleep, teenagers gathering at the benches by Primark at 5am and smoking illegal substances...</p> <p>There should be an obligation put on these premises owners to invest in extra staff to deal with their troubled customers, for the safety of those who live within and not to make police the only responsible for dealing with asb.</p> <p>Shorter licence hours (2am max) would be a good start.</p>	<p>Having considered the crime statistics in the area, the Licensing Authority is of the view that the number, type and density of premises selling alcohol for consumption on and off the premises and the provision of late night refreshment within the ring road is having a cumulative impact and undermining the licensing objectives. A cumulative impact policy has been adopted in this area. Specific incidents would need to be reported to the relevant Authorities. The policy hours do not support applications past</p>

		2am, however each application is judged on its own merits.
Resident	<p>To limit the amount, level and seriousness of crime in Romford town which has the highest crime level of any ward in the borough all licenced establishments selling alcohol should be restricted to 2am with no exception.</p> <p>All hot food takeaway outlets should have their opening hours restricted to 1.30am. This will encourage people to leave clubs earlier to get food and go home and will reduced crime as alcohol consumption will be time limited and there will be no places for drunk groups who have the potential to cause issues to congregate whilst intoxicated late at night.</p> <p>I have seen this implemented by other councils in country and it has led to a huge decrease in crime, and violence - essentially cleaning up the area and creating a better environment for all residents. The was also limited impact on business as most sales would happen earlier in the night. There were also reduced running costs for club operators as they needed staff for less hours.</p> <p>Another policy that has worked is that all hot food takeaway is prohibited after midnight and any food has to be consumed on the premises. This also helps with littering that blights Romford.</p>	<p>Having considered the crime statistics in the area, the Licensing Authority is of the view that the number, type and density of premises selling alcohol for consumption on and off the premises and the provision of late night refreshment within the ring road is having a cumulative impact and undermining the licensing objectives. A cumulative impact policy has been adopted in this area.</p> <p>It would be unlawful to have a blanket policy as each application is judged on its own merits. However, Havering's recommended policy hours do not support applications past 2am.</p>
Representative of licensed premise	<p>I support the RTC CIZ in principal but consider that bona fide restaurants within policy hours should remain exempt but also that small capacity bars, tap rooms etc should also be exempt in framework hours.</p> <p>The policy should apply in full to off licences outside of framework hours. LNR's should be considered pragmatically. Currently the pragmatism</p>	<p>This cumulative impact policy is not absolute. The circumstances of each application within the cumulative impact area will be considered upon its own merits.</p> <p>The proposed cumulative impact policy does create an exception for</p>

	<p>promoted by the LGA & HMG should be applied to help & support the trade during the pandemic.</p>	<p>applications for restaurants where alcohol is sold ancillary to a table meal and the terminal licensing hour is in line with the Policy.</p> <p>The Policy goes on to give some examples of exemptions that may be considered as exceptional which include small premises with a capacity of 50 persons or less that are in line with policy hours.</p> <p>We believe the policy hours provide a balance between business need and residents expectation.</p> <p>The Authority would follow any relevant guidance issued in relation to the pandemic.</p>
Resident	<p>I as a resident of Havering hold havering council responsible for the problems caused in Romford town centre by allowing the amount of licensed premises and shops selling alcohol late into the night from early morning. Sadly we no longer frequent the town centre to go to the cinema or for a nice meal due to the behaviour of so many inebriated people</p>	<p>The Licensing Authority is of the view that the number, type and density of premises selling alcohol for consumption on and off the premises and the provision of late night refreshment within the ring road is having a cumulative impact and undermining the licensing objectives. A cumulative impact policy has been adopted in this area.</p>
Resident	<p>However, these rules should apply to all late night licenced premises across the Borough. There has been trouble in Hornchurch. for example.</p> <p>Many of these late-night premises are a curse on our society. Many are unruly, they are not needed. Any financial benefit they may give to Havering is negated by</p>	<p>Comment has been noted, this comment does not require an amendment to the draft policy.</p>

	the cost of policing the Borough. A view that if some Havering premises were to close, the customers will simply go elsewhere. Fine.	
Resident	I disagree with the approach; I think refusing licences is not the best approach	The policy does not present a blanket refusal for all applications within cumulative impact zone. It creates a rebuttable presumption that applications for new premises licenses will normally be refused unless the applicant can demonstrate why the operation of the premises will not add to the cumulative impact and will not impact adversely on the licensing objectives.
NA	In my opinion, this does not go far enough. Whilst it is great that the local authority does not intend to grant any more licences, it should actively be looking to reduce the number of licences already held, ensuring that existing venues are only given renewals if they are effectively managing their customers.	The purpose of the policy is not to reduce the number of licensed premises. It is designed to encourage quality applications that will not add to the cumulative impact of licensed premises. There are mechanisms in place which can be used to address venues that are not effectively managing their customers.
Cumulative impact policy for Hornchurch Town Centre: Reduce		
Resident	Zone that protect residents should not be made smaller	Cumulative impact assessments must be evidenced based. The assessment for the Hornchurch CIZ is based on evidence provided by the local Community Safety Partnership. The evidence only identifies issues within the central town centre

		area which is why the area has been selected.
Resident	<p>I do not want the impact zone reduced. The licensed pubs and clubs in this area have a terrible impact on our neighbourhood. People urinating everywhere, vomit on the pavements, take away food wrapping and alcohol cans and bottles left all over the streets, loud music playing, So loud, it can be heard from my property in Mill Park Avenue. Anti-social behaviour in the surrounding streets- shouting, urinating in alleyways, broken glass bottles, take away food wrapping left in the street all due to the drinking of alcohol. The crime figures speak for themselves. Hornchurch has become a hub of violence. How do you think I feel when my 12-year-old son has to walk back from his friend's house along the high street in the evening with all of this behaviour going on? I'm seriously concerned for his physical and mental well-being because of the people's behaviour in the area. Licensing for pubs and clubs needs to be stricter and no more licences granted for drinking establishments. Hornchurch pubs are not keeping to the social distancing rules - always see queues of people very close together with no face coverings waiting to enter one particular pub in the high street.</p>	<p>Cumulative impact assessments must be evidenced based. The assessment for the Hornchurch CIZ is based on evidence provided by the local Community Safety Partnership. The evidence only identifies issues within the central town centre area which is why the area has been selected.</p> <p>Having considered the crime statistics in the area, the Licensing Authority is of the view that the number, type and density of premises selling alcohol for consumption on and off the premises is having a cumulative impact and undermining the licensing objectives. A cumulative impact policy is proposed to be adopted in this area. Specific incidents would need to be reported to the relevant Authorities.</p>
Resident	<p>As a resident of Hornchurch, Billet Lane we are consistently subjected on Thursday, Friday, Saturday and Sunday nights, patrons intoxicated walking home shouting and fighting in the street disturbing sleep, leaving litter glasses/food waste in our front gardens, urination alongside of Emerson drive near electric box, cars speeding and playing loud music as exiting Hornchurch as a result numerous crashes and incidents have occurred further up near Emerson station and pets lives lost. I would like to see more measures put in place to protect the residents within these areas.</p>	<p>The crime statistics have identified the Hornchurch area as an area of concern. As such, a cumulative impact policy has been adopted which goes as far as Emerson Park station and incorporates all of Billet Lane.</p> <p>The policy is designed to manage the licensed trade within the area. The measures within the policy are appropriate for this purpose.</p>

Resident	Same as for Romford (We need to support our emergency services especially given how stretched they are in these times.)	Comment has been noted but this comment does not impact the contents of the policy.
Resident	I agree these town centres should be a place where we all feel happy and safe , they should not just be the evenings for social behaviour that is intimidating to the public	Comment has been noted but this comment does not impact the contents of the policy.
Resident	I see Hornchurch has been added. Very good. Just extend the policy to all of the Borough.	Cumulative impact assessments must be evidenced based and the evidence does not support a cumulative impact zone for the whole of the borough. The assessment has identified three areas within Havering that we propose adopt a ClZ. These areas cover Romford, Hornchurch and Harold Hill.
Resident	Again I disagree with restricting licences and feel that its not the best approach	The policy does not present a blanket refusal for all applications within cumulative impact zone. It creates a rebuttable presumption that applications for new premises licenses will normally be refused unless the applicant can demonstrate why the operation of the premises will not add to the cumulative impact and will not impact adversely on the licensing objectives.
Resident	Reduce number of bars/nightclubs and closing times	The purpose of the policy is not to reduce the number of licensed premises. It is designed to encourage quality applications that will not add to the cumulative impact of licensed premises.

NA	The reduction in size of the area seems reasonable as it focuses on the main problem zones.	Comment has been noted but this comment does not impact the contents of the policy.
Representative of licensed premise	We are glad to see the CIZ just covers Hornchurch TC. Always thought including one area of Elm Park & also Upminster Bridge was unjustified. As with my comments above re Hornchurch TC. I support the limitation of the CIZ to Hornchurch Town Centre only. Upminster Bridge and part of Elm Park should never have been included.	Comment has been noted but this comment does not impact the contents of the policy.
Cumulative impact policy for Gooshays. Proposal to apply the policy to off sales premises only		
Resident	Same as for Romford/Hornchurch (We need to support our emergency services especially given how stretched they are in these times.)	Comment has been noted but this comment does not impact the contents of the policy.
Representative of licensed premise	Support this policy especially having worked in Harold Hill.	Comment has been noted but this comment does not impact the contents of the policy.
Resident	Good. Another area designated for concern.	Comment has been noted but this comment does not impact the contents of the policy.
NA	It is good that this approach is being adopted in this area and that it is recognised that this could be a result of the increased rates of resident deprivation in the location. This is hopefully being used in support of other policies around health and social care to ensure that residents are being given appropriate help to break free of negative behaviours where these are identified.	Comment has been noted but this comment does not impact the contents of the policy.
Is the Havering 2021-2026 Statement of Licensing Policy generally clear?		
Resident	The document talks in vague terms but does not offer specific details that some may find helpful on a given topic.	We believe the policy is a detailed document that sets out the Authorities approach to licensed premises and meets the requirements of the Licensing Act 2003.

<p>Council</p>	<p>Further to our recent discussions on Planning representations I note that para 11.1 in the new policy appears to duplicate the current policy's wording:</p> <p>11.1 The Licensing Authority considers that, in the interests of clarity and transparency, applicants should normally have in place the relevant planning consent for the intended use and hours of operation, or otherwise have lawful planning status, before making an application for a premises licence. However, every application will be considered on its merits on a case by case basis.</p> <p>I would suggest that para 11.1 is modified along the following lines:</p> <p>11.1 The Licensing Authority considers it desirable for applicants for a premises licence or a club premises certificate to have in place the relevant planning consent or lawful planning status for the intended use and hours of operation at the point when a premises licence application or a club premises certificate application is made. Each application, however, will be considered on its merits on a case by case basis.</p> <p>Where an application made under the Licensing Act 2003 is granted at a variance to the premises' planning consent the Licensing Authority will expect the premises licence holder or club premises certificate holder to apply to align the planning hours with the licensing hours to avoid the potential for offences being committed under planning legislation.</p>	<p>The comments have been agreed and adopted into the new policy. Paragraph 11.1 now states:</p> <p><i>11.1 The Licensing Authority considers it desirable for applicants for a premises licence or a club premises certificate to have in place the relevant planning consent or lawful planning status for the intended use and hours of operation at the point when a premises licence application or a club premises certificate application is made. Each application, however, will be considered on its merits on a case by case basis.</i></p> <p><i>11.2 Where an application made under the Licensing Act 2003 is granted at a variance to the premises' planning consent the Licensing Authority will expect the premises licence holder or club premises certificate holder to apply to align the planning hours with the licensing hours to avoid the potential for offences being committed under planning legislation.</i></p>
<p>Resident</p>	<p>The wording within section 3.17 is confused and does not make sense? It currently states:</p> <p>"It is important to note that the duty to make reasonable adjustments cannot wait until either a complaint is received or</p>	<p>The comments have been agreed and paragraph 3.17 now reads:</p> <p><i>3.17 It is important to note that the duty to</i></p>

	<p>when someone with a disability wants to visit a particular your venue.”</p> <p>It appears some words have been missed, i.e. “event at” to read correctly as “someone with a disability wants to visit a particular event at your venue” or perhaps it needs to be reworded as “someone with a disability wants to visit your particular venue”?</p> <p>Essentially it is unclear??</p>	<p><i>make reasonable adjustments cannot wait until either a complaint is received or when someone with a disability wants to visit a particular venue.</i></p>
Resident	<p>It is time it was enforced , no point or good making policies that are not carried out .e.g. many establishments serving to under-age . Large groups of adults in town centres spilling out onto pavements after drinking sessions.</p>	<p>Comment has been noted but this comment does not impact the contents of the policy. Specific concerns should be raised with the relevant authorities.</p>
Resident	<p>It should be more user friendly for the public to understand. Less jargon please</p>	<p>We believe that the policy is written in plain English but some jargon will be unavoidable due to the technical nature of the content.</p>
<p>Do you think the draft Havering 2021-2026 Statement of Licensing Policy strikes the right balance between allowing licensed premises to operate / invest and ensuring that the community and the four licensing objectives are protected?</p>		
Resident	<p>Particularly in relation to noise, Havering policy does not protect residents. The process to report & sanction a business that consistently disturbs residents is long winded, burdensome & ineffective.</p> <p>Licenses for bars opening times, the volume of music & the amount of people allowed to congregate in outdoor areas (effectively the street) are grossly generous & in my case have proven a consistent nuisance, disturbance (including the ability to sleep) & burden on my mental health.</p>	<p>We have looked at and updated the section in the policy which relates to noise in light of comments raised in the consultation.</p> <p>Each application must go through a statutory 28 day consultation period, during which, Responsible Authorities and interested parties can make valid representations.</p> <p>Specific issues should be raised through the relevant Authorities to investigate.</p>

Street Pastor	<p>Premises are currently not adhering to entry exit rules often have no door staff on duty allow glasses and bottles to be consumed on the street. (e.g. [REDACTED]) Many are better than this.</p> <p>Underage groups rejected from premises allowed to congregate on the street. Regular drug dealing observed on street around railway station. Not able to get CCTV on this as many Cameras not working and out of service contract for repair and Mercury control understaffed late nites. Police excellent but only respond 21/08/20 first nite regular presence noted. Good points [REDACTED] closes 11pm helps to prevent congregating groups after venue closure. Note in other cities venues contribute to cost of policing etc for each hour open later than midnight as it is unfair for other businesses to near impact of this extra and often unequally heavy cost.</p>	<p>Your specific concerns have been passed to an officer to look at.</p> <p>You also raise general concerns regarding Policing the Night Time Economy and the challenges this poses.</p> <p>Your concerns will be passed to the relevant department but do not require an amendment to the proposed policy.</p> <p>The Authority is not proposing the introduction of a late night levy at this time.</p>
Resident	Hornchurch area is out of control.	The crime statistics have identified the Hornchurch area as an area of concern. As such, a cumulative impact policy has been adopted in this area.
Business Owner	In the majority of cases, to keep people healthy, alcohol should be enjoyed with food or in smaller amounts. This statement supports this notion.	Comment has been noted. This comment does not impact the contents of the policy.
Resident	<p>One of the point states:</p> <p>1.6 The Act identifies five other key aims that are important for all those involved in licensing to support and promote through good practice.</p> <p>These are:</p> <p>Protecting the public and local residents from crime, anti-social behaviour and noise nuisance caused by irresponsible licenced premises.</p> <p>It's purely a >paper statement< sadly. I, as my neighbours have logged with the council numerous complaints against</p>	<p>We have looked at and updated the section in the policy which relates to noise in light of comments raised in the consultation.</p> <p>Each application must go through a statutory 28 day consultation period, during which, Responsible Authorities and interested parties can make valid representations.</p>

	such nuisances, however none of it has been take seriously enough to having to deal with.	Specific issues should be raised through the relevant Authorities to investigate.
Resident	Still too many premises being allowed to sell alcohol, the council are responsible for giving out these licenses.	Each application must go through a statutory 28 day consultation period, during which, Responsible Authorities and interested parties can make valid representations.
Resident	All the Borough of Havering should be included to cover any future openings.	Cumulative impact assessments must be evidenced based and the evidence does not support a cumulative impact zone for the whole of the borough. The assessment has identified three areas within Havering that we propose adopt a CIZ. These areas cover Romford, Hornchurch and Harold Hill.
Resident	We need a thriving economy now more than ever	Comment has been noted. The policy does aim to balance the needs of business whilst also considering the needs of residents.
Resident	I think the Havering draft Statement is weaker than some others I have read regarding Public Nuisance -Noise. For example, City of London seemed to have been clearer in what is acceptable: In particular, the City Corporation will expect the applicant to be proposing practical steps to prevent disturbance to local residents. The City Corporation will expect the applicant to supply an acoustic report in applicable circumstances confirming that there will be no noise breakout	The comment has been agreed in part. The policy does reference noise in the body of the policy, appendix 3 and the pool of model conditions. Amendments have been made to appendix 3 and an additional condition has been added to the pool of model conditions. The following wording has been added to

	<p>from the premises that is likely to cause public nuisance to persons living or working in the area around the licensed premises. Any doubts as to whether such a report is required can be discussed in the pre-application meeting.</p> <p>Any sound leakage must be addressed in practical ways such as:</p> <p>i) keeping doors and windows closed and providing adequate mechanical ventilation</p> <p>ii) reducing sound levels and installing an approved sound limiting device to prevent sound exceeding the appropriate level, both the device and the level to be approved by a suitably qualified acoustic consultant</p> <p>iii) providing double door entry to premises with a ventilated lobby, to reduce noise levels generally and during entry and exit of persons to the premises</p> <p>iv) installing soundproofing measures to contain sound and vibration</p> <p>Their final statement is the same as Havering's 17.3</p> <p>Westminster has a model condition regarding noise which I think would also benefit Havering residents if it formed part of Havering's Statement, perhaps included as part of Section 18.:</p> <p>Loudspeakers shall not be located in the entrance lobby or outside the premises building.</p>	<p>Appendix 3 in relation to public nuisance:</p> <p><i>Would double door entry to the premises reduce noise levels during entry and exit to the premises?</i></p> <p><i>Are the sound proofing measures to prevent sound and vibration adequate for the activity proposed?</i></p> <p>An extra condition has also been added as follows:</p> <p>PN03 <i>A noise limiter shall be installed and set up in conjunction with the Council's noise nuisance team.</i></p>
Final Comments		
Resident	<p>As noted above, how noisy businesses are & the generous terms allowed for bars & pubs needs urgent review.</p> <p>A lot more consideration needs to be given to local residents.</p>	<p>Each application must go through a statutory 28 day consultation period, during which, Responsible Authorities and interested parties</p>

		can make valid representations.
Resident	Need to be much stricter with licensing. Licenses need to be revoked where premises are linked to violence or crime. COVID-19 - 19 premises security needs to be monitored properly and policed.	Each application must go through a statutory 28 day consultation period, during which, Responsible Authorities and interested parties can make valid representations. There is a mechanism to review a premises licence where there are serious concerns relating to the licensing objectives. The policy does require businesses to have a COVID 19 risk assessment in place at this time.
Resident	I particularly welcome earlier closing in Romford for nightclubs & pubs. Longer hours mean more drinking and more incidents. Revellers should also be encouraged to leave the areas promptly so I agree closure of food suppliers should be at least an hour before the venues close.	Thank you for your comments. This does not require an amendment to the policy.
Representative of licensed premise	No general comment. Thank you for consulting us. Your Licensing Officers are a credit to the Council.	Comment has been noted but this comment does not impact the contents of the policy.
Business Owner	The draft statement seems fair as a policy, I would just suggest that more training for licensees should be available - especially in the case of mental health, equality & diversity & counter terrorism as the new obligations suggest is needed. To ensure that licensees are on board with the statement, there should be an easy and direct method of support from Havering council in instances of situations that venues cannot control (e.g. policing / social services).	The authority can consider more training and signposting. This is not however a matter for the licensing policy to address. The licensing policy is published on the Council website. Contained within the policy are contact details for all Responsible Authorities which include the Police and Social Services.

Resident	<p>I do not think it goes far enough to protect mental health , equality , protection of children , or diversity , alcohol has certainly added to the spreading of COVID-19 19 people meeting up drinking and then creating social problems because they are under the influence of alcohol.</p>	<p>We have identified areas of concern within the Borough where the number, type and density of premises selling alcohol and the provision of late night refreshment is having a cumulative impact and undermining the licensing objectives. Where these have been identified, a cumulative impact policy has been adopted.</p> <p>We have reviewed the policy and believe that it does address mental health, equality, protection of children and diversity. These areas have been significantly increased since the previous policy.</p>
Resident	<p>Many of these licensed premises offer nothing but trouble for the police, health service, and the Borough's street cleaning services.</p> <p>They provide local employment, local business rates, and there is a spill out effect to food establishments and taxi services which I expect also employ local people, however what is the true cost to the police and health service.</p> <p>Not all the customers cause trouble, of course not, but enough of them do to make the whole Borough alarmed every weekend.</p> <p>How many Havering Councillors are patrons of these clubs. None, one.....?</p> <p>The fact that they need bouncers on the doors tells you enough. They are a curse.</p>	<p>The policy is there to encourage responsible venues and promote the licensing objectives.</p> <p>We have identified areas of concern within the Borough where the number, type and density of premises selling alcohol and the provision of late night refreshment is having a cumulative impact and undermining the licensing objectives. Where these have been identified, a cumulative impact policy has been adopted.</p>
NA	<p>Overall, the policy is clear, makes sense and will improve things across the borough, but it must be implemented hand in hand with health and social care policies to ensure that the root causes of</p>	<p>Comment has been noted but this comment does not impact the contents of the policy.</p>

	problem drinking and associated violent behaviours are addressed.	
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5 Conclusion

Most respondents felt the proposed policy is clear and effectively promotes the four licensing objectives.

The proposed Cumulative Impact Zones (CIZs) were generally well received. There were some comments requesting stricter controls for the Romford CIZ. A few respondents commented that licences should not be granted past 2am. The proposed policy states some applications may be looked at favourably if they do not open beyond 0200 hours, however each individual application will be considered on its own merits as many factors will be considered such as the location of the premises, the operating schedule etc. if representations are made.

A few respondents also expressed concern about the reduction of the Hornchurch cumulative impact zone. Cumulative impact assessments must be evidenced based and the evidence does not support a cumulative impact zone for the whole of St Andrew's Ward. The main Town Centre of Hornchurch will remain covered.

Having considered all of the comments received it was felt that the proposed policy and CIZ's strike the right balance between supporting businesses whilst addressing residents' concerns.

Some amendments were made to the draft policy as detailed in section 4 above following comments received in relation to planning, equalities and noise.

APPENDICES:

A: List of Consultees

- Street Pastors
- Rayleigh Rochford and District Association for Voluntary Service
- Havering Chamber of Commerce
- The Federation of Small Businesses (FSB)
- Community Safety Team
- British Beer and Pub Association
- Havering Chamber of commerce
- Havering Safe and Sound Partnership
- Licencing Police
- Westminster Drug Project
- Children's Services
- Public Health
- Economic Development/Regeneration
- London Fire Brigade
- Environmental Health
- Planning
- Havering Lesbian Gay, Bisexual and Transgender Forum
- Salvation Army
- Youth Council
- London Riverside Business Improvement District (Rainham)
- Romford Town Centre Business Improvement District
- Romford Police Station- Chief of Police
- CalBrief
- Black, Asian, and Minority Ethnic (BAME) Forum
- WizeUp Havering