

Licensing Act 2003 Responsible Authority representation

This representation is made by a responsible Authority for the London Borough of Havering concerning an application for a premises licence for the premises as detailed below.

Premises Name and address: Raztina, 57 High Street, Hornchurch, RM11 1TP

Your Name: Oisin Daly

Organisation name/name of body you represent: Licensing Authority of the London Borough of Havering

Your Address: C/O, Town Hall, Main Road, Romford, Essex, RM1 3BD

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Summary of Objection: Objection to an application for a premises licence as if granted likely to undermine all four licensing objectives.

Policy Considerations:

Havering's Licensing Policy identifies areas where the concentration of licensed premises is already causing problems that undermine the licensing objectives. The policy states that:

6.3 For areas where a cumulative impact policy is adopted, it creates a rebuttable presumption that applications for new premises licences, club premises certificates, or variation applications that will add to the existing cumulative impact, will normally be refused, unless the applicant can demonstrate why the operation of the premises involved will not add to the cumulative impact and not impact adversely on the promotion of the licensing objectives. The exception to this policy may be for applications for restaurants where alcohol is sold ancillary to a table meal.

The assessment highlights that late-night alcohol supply in these areas contributes to crime, disorder, nuisance, and pressure on public services.

9.3 It identified the main hotspot as the High Street which locates a number of bars and pubs. A large proportion of the offences were reported in, and in close proximity to, licensed pubs and clubs.

9.4 On the basis of the above evidence 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 around the High Street is having a cumulative impact and undermining the licensing objectives. It is likely that granting further licences would be inconsistent with the authority's duty to

promote the licensing objectives and a cumulative impact policy has been adopted in this area.

The application before the Authority falls squarely within this framework.

12. Licensing Hours

12.1 When dealing with new and variation applications the Licensing Authority may give more favourable consideration to applications with the following closing times:

Public Houses and Bars

23:00 hours Sunday to Thursday

Midnight Friday and Saturday

Nightclubs

01:00 hours Sunday to Thursday

02:00 hours Friday and Saturday

Restaurants and Cafes

23:00 hours Sunday to Thursday Midnight- Friday and Saturday

Off licences 23:00 Monday to Sundays

Hot food and drink supplied by takeaways, fast food premises

Midnight- Sunday to Thursdays 01:00 Friday and Saturday

Hotel residents only 24 hours sale of alcohol for on sales only

12.2 Consideration will also be given to the type of area that the premises is located in with regulated activities normally being permitted until 23.30 in residential areas and 00.30 in mixed use areas.

12.3 The above hours are a guide and each application will be considered on it's own merits.

12.4 The above hours are intended to guide applicants on the Licensing Authority's expectations when preparing their operating schedules.

12.5 For applications within the above hours there is no presumption that the application will automatically be granted in all cases where a relevant representation has been made. If no representations are received, the application will be granted by the licensing authority under delegated powers.

12.6 Applicants who wish to provide licensable activities outside the hours specified above should ensure where relevant the operating schedule specifies detailed measures to militate against crime, disorder and public nuisance etc. taking into account:

- The location of the premises and the character of the area in which they are situated
- The proposed hours during which licensable activities will take place
- The adequacy of the applicant's proposals to prevent crime and disorder and prevent public nuisance

- Whether customers have access to public transport when arriving at or leaving the premises
- The proximity of the premises to other licensed premises in the vicinity and the hours of operation of those other premises policies and proposals for the orderly dispersal of customers.

17. Noise

17.1 The Licensing Authority is committed to protecting the amenity of residents and businesses in the vicinity of licenced premises, particularly when late hours have been sought. Where relevant representations are received, the Licensing Authority will request appropriate restrictions or controls on the licence to support the prevention of undue noise disturbance from licensed premises.

17.2 The Licensing Authority will seek to balance the protection of residents from undue disturbance against noise and the activity that is the natural by-product of people going about their business, entertainment or leisure.

17.3 The Licensing Authority expects that premises intended for the provision of noise-generating licensable activities are acoustically controlled and engineered to a degree where the noise from the premises when compared to the ambient noise level will not cause undue disturbance. The Licensing Authority recognises specific difficulties associated with premises structurally linked to would be licensed premises and the limit of sound insulation performance that can be achieved. In some circumstances licensed premises adjoining residential properties may not be appropriate.

Representation

I am submitting this representation on behalf of the Licensing Authority in relation to the application for Late Night Refreshment at the above premises until 03:00 seven days a week.

The premises sits within one of Havering's Special Cumulative Impact Policy (SCIP) areas, as set out in the London Borough of Havering Statement of Licensing Policy 2021–2026.

Under the policy, there is a presumption to refuse applications that would add to cumulative impact unless the applicant can demonstrate exceptional circumstances. In this case, the applicant has not provided sufficient evidence to rebut that presumption.

The applicant states there is no residential properties in the vicinity, however, we know that is not the case. There are several flats above shops all the way along the high street and less than a minutes walk from the venue.

To mitigate issues, the applicant has only offered additional signage for customers.

The applicant has stated they have extensive experience in the industry but with no supporting evidence. The applicant is a franchisee, whilst they may have support of the parent company, they cannot rely on the history of other premises under that umbrella as evidence of their experience in managing premises in a NTE environment.

If granted, this premises would exist as the latest opening fast-food premises within the town centre. This would create a focal point for those leaving licensed premises to congregate and reduce dispersal.

Town Centre Alcohol Licensed Premises:

Name	Type	Terminal Hour for Alcohol (Fri/Sat)
Firkin	Pub	00:00
Frankies	Bar	01:00
JJ Moons	Pub	01:00
Luna	Nightclub	03:00
Rising Sun	Pub	01:00
Shelleys	Bar	02:00
Suttons Arms	Pub	01:00
Mandarin Palace/V Bar	Bar	01:00
Vertigo	Bar	01:30

The applicant seeks to exempt themselves from guideline policy hours but offers to exceptional circumstances or mitigation to reduce the risk of the licensing objectives being undermined. An extension of hours from policy in a SCIP area is specifically identified in the policy as the type of application that is likely to add to cumulative impact.

Later hours inevitably increase:

- the number of people present in the night-time economy during peak risk periods
- a retention of intoxicated individuals in a small geographical area
- the pressure on police and emergency services
- the likelihood of noise and disturbance during dispersal

This is precisely what the SCIP is designed to manage. Extended hours would add to existing pressures.

To depart from the SCIP, the applicant must demonstrate exceptional circumstances and show that the licence if granted will not add to cumulative impact.

In this case:

- The applicant has not provided a detailed dispersal plan addressing late-night nuisance
- No evidence has been offered to show the premises will be neutral or beneficial to the area
- The measures proposed (CCTV, health and safety and managing waste) are standard and expected of all premises, not exceptional
- Children would be permitted on the premises until 03:00hrs
- No assessment has been provided to show how the extended hours would avoid contributing to peak-time disorder

As a result, the applicant has not rebutted the presumption of refusal set out in the policy.

Granting the application would undermine the following objectives:

Prevention of Crime and Disorder:

The CIA identifies late-night alcohol supply as a key driver of crime and disorder in SCIP areas, a late night refreshment premises open later than the majority of pubs and bars would exacerbate this.

Prevention of Public Nuisance:

Extending hours would prolong noise and disturbance associated with dispersal and could increase congregation within the town centre.

Public Safety:

Increased footfall and intoxication levels place additional strain on emergency services. The later the premises remains open, the increased likelihood of ASB and/or violent incidents occurring.

Protection of Children from Harm:

Children would be permitted to be on the premises until 03:00hrs in an unsuitable environment with potentially intoxicated adults and no doorstaff presence.

Conclusion

The premises is located within a Special Cumulative Impact Policy area. The application seeks extended hours during the highest-risk period. The applicant has not demonstrated exceptional circumstances or provided evidence to show the licence if granted would not add to cumulative impact.

Complaint and Inspection History (if applicable)

N/A

Other documents attached

N/A

Signed



Dated: 23rd June 2026