

**EDYN LTD**

**APPLICATION FOR A PREMISES  
LICENCE**

**DALSTON LOCKE  
130 KINGSLAND HIGH STREET  
LONDON E8 2LQ**

**APPLICANT'S SUBMISSIONS**

## Case Summary

1. This is an application for a Premises Licence at 130 Kingsland High Street, London E8 2LQ (“the Premises”).
2. The applicant is Edyn Ltd and we have included as part of our bundle more information about who Edyn are, as well as the company’s ethos and approach.
3. The Premises will be a 124 room hotel with the layout as per the plans submitted with the application. To assist with understanding those plans the use of each floor is set out below:

**Basement** - the basement level is mixed use and includes hotel bedrooms, a gym facility, back of house areas including the kitchen, a micro-brewery and a courtyard restaurant.

**Ground floor** - the ground floor is primarily made up of the hotel entrance area and hotel bedrooms. At the front of the hotel there is also the hotel bar and a lounge space.

**First/Second/Third/Fourth/Fifth floors** - are comprised entirely of hotel bedrooms with associated back of house areas.

4. Hotels are 24 hour premises where residents and their guests come and go without curfew and this is noted within the application in the context of the opening hours, and the hours for Licensable Activities, for hotel residents and their guests.
5. Hotels also welcome members of the public to use their facilities and in this case those will be the food and beverage facilities located at ground and basement level. Members of the public will not have access to other parts of the hotel.
6. We asked that members of the public be able to use the premises between the hours of 7am and midnight Sunday to Wednesday and from

7am to 1am the following morning Thursday to Saturday. We believe that these hours are commensurate with the running of a hotel's food and beverage offering and we propose to put in place a raft of control measures to ensure the promotion of the four Licensing Objectives and I will come onto those in due course. In subsequent discussions with the Police Licensing Team the hours requested have been amended slightly and this is set out in our Case Update.

7. The Premises falls within your Dalston Special Policy Area, which is a Cumulative Impact Area within the meaning of the Licensing Act 2003.
8. The Applicant has always known and understood this and with that in mind the Applicant has prepared a specific document addressing your Cumulative Impact Policy.
9. Relevant representations have been received from:
  - a. Hackney's Licensing Team (as a Responsible Authority);
  - b. The Police Licensing Team;
  - c. Environmental Protection; and
  - d. Interested Parties.
10. The Applicant has prepared a specific document addressing the concerns raised in the representations.
11. The Applicant has engaged with the Responsible Authorities and has provided a number of clarifications and concessions including a reduction in terminal hour (see Case Update). The Police Licensing Team and the Environmental Protection Team have withdrawn their representations.
12. It has not been possible, however, to deal with all of the concerns raised and this application falls to be determined by you, the Licensing Sub-Committee.
13. The options available to the Licensing Sub-Committee in respect of this application are:

- a. to grant the licence;
- b. to grant the licence but exclude a certain licensable activity;
- c. to grant the licence but refuse to specify the individual identified as the DPS;
- d. to refuse the application.

14. It is the Applicant's submission that when all of the available evidence is taken into account that it is appropriate and proportionate to grant this application and we invite you to reach that conclusion too.

## Statement on Cumulative Impact

1. This document is prepared to assist the Sub-Committee in determining the application by Edyn Ltd for Dalston Locke, 130 Kingsland High Street, London E8 2LQ.
2. The application site falls within Hackney Council's Dalston Special Policy Area. This means that where relevant representations are made, the onus is on the Applicant to prove that the application, if granted, **will not negatively add to the cumulative impact** being experienced in the surrounding area. **[emphasis added]**
3. The Applicant can do this in a variety of ways, however your policy notes that the quality and track record of the management and the good character of the applicant may not be sufficient to overcome that hurdle. This does not mean that the quality and track record of the management and the good character of the Applicant are irrelevant, far from it.
4. This document is going to focus on the following issues that we consider key to proving that this application is unlikely to negatively affect the cumulative impact experienced in the surrounding area. It will also refer to the relevant paragraphs of your Statement of Licensing Policy (2018 - 2023 and the Guidance Issued under Section 182 of the Licensing Act 2003 ("the Section 182 Guidance")):
  - a. The type and style of the premises and the likely effect on cumulative impact;
  - b. The measures put in place by the applicant to positively promote the licensing objectives;
  - c. The track record of the applicant;
  - d. The ameliorating effect of well-run licensed premises
  - e. The iron curtain effect of keeping out good operators;
  - f. Whether the cumulative impacts that led to the policy are still evident post COVID-19; and
  - g. Other measures for controlling cumulative impact.

### Type and style of premises

5. The Premises is a hotel in that it's primary function, therefore, is to provide room and board to paying guests. Hotels often also encompass a food and beverage offer, usually a restaurant and a bar. Primarily, these are for the use of hotel guests but in most instances they are also accessible by members of the public. Many of London's highly regarded bars and restaurants are attached to hotels for example:

- The Angler / South Place Hotel (restaurant)
- Galvin at Windows / Hilton Park Lane (restaurant)
- Alain Ducasse / The Dorchester (restaurant)
- The American Bar / The Savoy (bar)
- Cocktail Lounge / The Zetter Townhouse (bar)
- The Punch Room / London EDITION (bar)

6. Hotels tend to be located in either extremely well-known areas, or those areas that are viewed as up and coming. Why are they located in these areas? Because that is where guests want to stay.

7. Hotels are not significant drivers of crime and disorder or public nuisance in the way that pubs, bars and nightclubs are. This is because hotels are in the business of selling sleep and if a hotel's food and beverage offer is managed in such a way that causes disturbance then it will be the hotel's guests, first and foremost, that are disturbed. That is not good business and a hotel that disturbs its own guests is likely to fail very quickly.

8. The same is true of the Applicant's premises and here is where the Applicant's track record becomes important. The Applicant runs a number of these types of premises around London and the United Kingdom. It's track record is impeccable and it has not had so much as a crossed word from a Responsible Authority at any of its sites. There is no reason to believe that would be any different were you minded to grant the Applicant a Premises Licence for Dalston Locke.

### **Measures introduced by the applicant**

9. It is well established that an application can be more than the sum of its parts and that a collection of measures, taken together, can overcome the presumption to refuse applications in a Cumulative Impact Area.

10. The measures taken by the Applicant to promote the Licensing Objectives fall into a number of categories:

- a. Those expressed as suggested conditions for the Premises Licence
- b. Those things that the Applicant does above and beyond the requirements of the Premises Licence; and
- c. The day-to-day running of the Premises.

11. The Applicant has suggested a comprehensive schedule of conditions that, should you be minded to grant this Premises Licence, we commend to you to impose as conditions. They include:

- a. CCTV;
- b. An incident log;
- c. A noise limiter;
- d. Notice provisions;
- e. Challenge 25;
- f. Safety measures;
- g. Waste and delivery management;
- h. A dispersal policy; and
- i. Contact details for local residents and businesses etc.

12. There are then the things that the Applicant does, or will do, that do not need to be, or cannot be, expressed as conditions on the Premises Licence. They include:

- a. Hiring policies;
- b. Staff training;
- c. Food safety;
- d. Health & Safety;
- e. Cleaning;
- f. Green working;
- g. Corporate Social Responsibility
- h. Policies and procedures;
- i. Counter Terrorism;
- j. Supporting local groups; and

k. Ethically sourced producers etc.

13. Then there is the way in which the management run the business. Looking at the Applicant's other sites the businesses contribute to the areas in which they are located rather than cause them problems.

#### **Track record of the applicant**

14. The track record of an Applicant is, in my submission, hugely relevant to the question of whether a Premises Licence should be granted to an Applicant in a Cumulative Impact Area. Your policy is right however, to say that the Applicant needs to do more than just turn up and rely on its pedigree to convince you to grant it a Premises Licence.

15. Details of the Applicant's track record are contained throughout this note and the other papers and I don't propose to repeat them here. I hope that the Sub-Committee will agree that this Applicant and this application is about more than just a squeaky clean record at other Premises.

#### **The ameliorating effect of well-run licensed premises**

16. When looking at applications in Cumulative Impact Areas the positive benefit that well-run, well managed premises can have is so often overlooked.

17. A well-run, well-managed licensed premises can have an ameliorating effect on issues of cumulative impact for a number of reasons.

18. First, the premises are visible and present, particularly in the context of hotels, 24 hours a day. They are well lit, covered by excellent CCTV coverage and have customers and guests coming and going. This discourages wrongdoers from congregating near the premises and bad or illegal behaviour is pushed away and discouraged.

19. Second, well-run premises will report problems and incidents to the Responsible Authorities allowing them to build up a more accurate picture of what, or whom, is causing the problems. Cumulative impact occurs where problems cannot be pinned on any one particular premises but well-run premises remove themselves from that equation narrowing the list of premises the authorities need to deal with.



20. Third, nice premises, such as a high end hotel, have a positive effect on the areas they inhabit. They attract good customers rather than wrongdoers. They also have a positive effect on other premises around them as other premises improve their image and procedures in order to “keep up with the Joneses.”

### **The iron curtain effect of keeping out good operators**

21. This is a concept that was explored in the Brewdog (Magistrates’ Court) case.

22. If you keep good operators out by incorrectly applying a Cumulative Impact Area Policy then you have the inverse effect to what is intended by the policy. You keep standards down rather than improving them.

23. As mentioned above, good operators have a positive effect on other premises because they force them to “up their game” to keep up.

### **Whether the cumulative impacts that led to the policy are still evident post COVID-19**

24. This is a new argument in light of the present circumstances the country finds itself in.

25. Cumulative impact is not a static concept. It is constantly evolving. Just because there is Cumulative impact on January 1 does not mean the same impacts are still there come December 31. Cumulative Impact Areas must be kept under constant review throughout the life of a Statement of Licensing Policy. It is also expected that Cumulative Impact Areas will be reviewed more regularly than Statements of Licensing Policy (3 years vs. 5 years).

26. The United Kingdom has recently been through/is going through a pandemic in the form of COVID-19. This led to significant restrictions being imposed on licensed premises in March 2020. Most licensed premises were closed, though it is accepted that some found ways to make the best of a bad situation and operate. Many licensed premises will not re-open. Can you, as a Licensing Sub-Committee, be satisfied that

cumulative impact still exists to such an extent that required you to bring in the policy in the first place?

### **Other measures for controlling cumulative impact**

27. The Section 182 Guidance contains useful information for Licensing Authorities on cumulative impact and Cumulative Impact Assessments.

28. The Section 182 Guidance also makes it clear that there are a host of other measures, beyond the scope of the Licensing Act 2003 for dealing with cumulative impact. These include:

- a. Planning control;
- b. Positive measures e.g. Best Bar None, Pubwatch, or BIDs;
- c. Community Protection Notices;
- d. CCTV;
- e. Public toilets;
- f. Street cleaning and litter patrols;
- g. DPPOs;
- h. Properly targeted enforcement;
- i. Late Night Levy; and
- j. Early Morning Restriction Orders.

29. Hackney Council already undertakes many of these initiatives. This is not an applicant that would refuse to support, or to take part in, sensible initiatives aimed at making the area a better place.

30. In relation to planning, despite it being a completely separate regime to licensing, it is worth noting that your Planning Committee granted planning permission for this premises. It is inconceivable to think that they did so absent the knowledge that a Premises Licence application would follow.

### **Conclusion**

31. Any decision on whether or not to grant a premises licence in a Cumulative Impact Area must be decided on the individual merits of the case in front of you. Our submission is that, taken in the round and in light of everything the Applicant has put before you, you have good reasons to

depart from your Cumulative Impact Area Policy and to grant this Applicant a Premises Licence.

## **Applicant's response to Representations**

### **Licensing Authority**

1. The Licensing Authority have made a relevant representation based solely on the Prevention of Public Nuisance Licensing Objective.
2. It follows that the Licensing Authority do not have concerns about the application on the grounds of:
  - a. The Prevention of Crime and Disorder;
  - b. Public Safety; or
  - c. The Protection of Children from Harm.
3. This is a useful starting point and the Authority's representation is welcomed.
4. The representation highlights LP10 from your Statement of Licensing Policy. The Applicant has always known and understood this and with that in mind the Applicant has prepared a specific document addressing your Cumulative Impact Policy.
5. The Applicant has also engaged in dialogue with the officer representing the Licensing Authority with a view to mediating his concerns, however this has not been possible.

### **Police Licensing Team**

6. The Police Licensing Team made a relevant representation based on the Prevention of Crime and Disorder and the Prevention of Public Nuisance Licensing Objectives. **This has since been withdrawn however our specific responses to the Police concerns are included for ease of reference.**
7. It follows that the Police Licensing Team do not have concerns about the application on the grounds of:

- a. Public Safety; or
  - b. The Protection of children from harm.
8. This is a useful starting point and the Police Licensing Team's representation is welcomed.
9. The Police did not seek outright refusal of the application, but rather that the hours for Licensable Activities (Sale of Alcohol) are reduced to fall in line with the hours identified in Hackney Council's Statement of Licensing Policy, specifically LP3. These were agreed.
10. There are a couple of aspects of the Police Licensing Team's representation that are easily dealt with and I will deal with them in turn:
  - a. Outside space - there is no outside space that forms part of the customer area at the hotel. I suspect this misconception arises for two reasons. Firstly, the description of a "courtyard" restaurant within the application and secondly, a condition referring to outside tables and chairs. The courtyard restaurant falls within the envelope of the building and is covered by a glass roof. If one looks at the plans for the ground floor they will see the roof denoted there. The condition regarding outside tables and chairs was a drafting error.
  - b. Customer hire - there are no function rooms within the hotel.
  - c. Designated smoking area - the Applicant proposes that the designated smoking area is located as shown on the smoking area plan. However, the Applicant is happy to work with the Responsible Authorities and Interested Parties to ensure that the designated smoking area is placed sensitive to the needs of others.
  - d. Tables and chairs - please refer to paragraph 10 (a) above.
  - e. Non-standard hours - the Applicant and the Police have agreed a 2am cut-off time on New Year's Eve/Day with non-residents being off the premises by 2:30am.

11. Having looked at the concerns expressed the Applicant is happy to reduce the scope of the application (for non-residents) to fall in line with Hackney's policy.
  
12. The Applicant has proposed an extensive suite of conditions to promote the four Licensing Objectives. Conditions dealing with concerns around the Prevention of Crime and Disorder and the Prevention of Public Nuisance include:
  - a. A comprehensive CCTV system and staff who are able to use it
  
  - b. A comprehensive incident log and reporting structure
  
  - c. A noise limiter set at a level where music cannot cause a nuisance to nearby neighbours and premises
  
  - d. Ensuring that doors are kept closed other than for access/egress to prevent noise escape
  
  - e. Timing deliveries and collections sensitively with local residents in mind
  
  - f. Implementing a dispersal policy to ensure that customers leaving the premises do so in a safe and orderly fashion
  
  - g. Displaying notices to remind customers as to their behaviour
  
13. The Applicant is in the business of selling sleep. If the food and beverage operation was managed in such a way as to undermine the Licensing Objectives then it is the Applicant's own guests who would be the first people to be disturbed.

### **Environmental Health**

14. The Environmental Health Service have made a relevant representation based solely on the Prevention of Public Nuisance Licensing Objective.

15. It follows that the Environmental Health Service do not have concerns about the application on the grounds of:

- a. The Prevention of Crime and Disorder;
- b. Public Safety; or
- c. The Protection of Children from Harm.

16. This is a useful starting point and the representation is welcomed.

17. The Environmental Health Officer does not seek outright refusal of the application, but rather the imposition of, or agreement to, six (6) additional conditions dealing with waste management. **These, slightly amended, have been agreed.**

### **Interested Parties**

18. The Application attracted representations from seven (7) Interested Parties. We understand them to be six (6) individuals/couples and one (1) residents association.

19. All of the Interested Party representations raise issues of cumulative impact. The Applicant has always known and understood this and with that in mind the Applicant has prepared a specific document addressing your Cumulative Impact Policy.

20. There is a recurring misconception in the Interested Party objections that the hotel will be a large "club" premises. We have presumed this to mean a "nightclub" rather than a "private members club" but in any case, there is no element of this application that relates to either.

21. There are three areas of the hotel that are accessible to members of the public (as well as to hotel residents and their guests) and they are:

- a. The hotel bar (ground floor);
- b. The hotel lounge space (ground floor); and
- c. The courtyard restaurant (basement).

22. Members of the public will not have access to other areas of the hotel. This is controlled by keycard access.
23. Another theme flowing through the Interested Party representations concerns planning.
24. Licensing and Planning are two separate and distinct regimes however, the Applicant acknowledges and understands that there is often crossover and overlap between the two.
25. Licensing proceedings should not be a re-run of planning proceedings and vice-versa.
26. The application has not attracted a representation from the council's planning department and the Applicant has taken specialist advice in respect of the planning facets of this application.

**Interested Party 1 (email 24 June 2020 timed 19:23)**

27. Interested Part 1 raises issues of:
- a. Cumulative Impact
  - b. Anti-social Behaviour (ASB)
28. In relation to Cumulative Impact please refer to the Applicant's document addressing this point.
29. In relation to the suggestion that anti-social behaviour will arise and emanate from the premises we refute this suggestion entirely.
30. The Applicant already operates a number of other hotels around the country based on a similar model (hotel with restaurant and bar). It is fair to say that the Applicant has not experienced one single complaint up and down the country about its premises. They are considered to be well-run.
31. A further point is that these are not the type and style of premises that lend themselves to that type of behaviour. The vast majority of customers



will be guests of the hotel who are paying to be there and to whom the Applicant owes a duty to provide a good night's sleep. It simply wouldn't be in the Applicant's interests to operate the premises in such a way as to allow a nuisance to be caused because they would be the first people affected by it.

### **Interested Party 2 (Rio Cross Residents Association)**

32. Interested Party 2 raises issues of:

- a. Cumulative Impact; and
- b. ASB; and
- c. Predatory behaviour by guests.

33. In relation to Cumulative Impact please refer to the Applicant's document addressing this point.

34. In relation to ASB, please refer to the Applicant's comments above.

35. In relation to the suggestion that guests of the premises will behave in a predatory fashion towards local women and children we abhor and utterly refute the suggestion. The hotel will have a safeguarding policy and staff will be trained in that policy. In the extremely unlikely event that safeguarding issues arise then they will be dealt with in accordance with that policy. The Applicant has never had a problem at any of its other hotels.

### **Interested Party 3 (email 22 June 2020 timed 20:54)**

36. Interested Party 3 raises issues of:

- a. Cumulative Impact
- b. Litter
- c. Noise
- d. Vermin

37. In relation to Cumulative Impact please refer to the Applicant's document addressing this point.

38. In relation to litter we have submitted a draft waste management strategy which sets out how the Applicant will deal with waste. It is not in the Applicant's interests to allow the exterior of the hotel to become untidy as this will affect guest satisfaction and to that end the Applicant will ensure that the outside of the premises remains litter free.

39. Customers will not be able to take drinks or glasses with them so the concerns about that type of litter are unfounded.

40. In relation to the suggestion that getting a good night's sleep is of high importance we could not agree more. We are in the business of selling it and the first people that will be disturbed are our own customers. This will not be allowed to happen and noise levels will be strictly controlled to avoid this. In terms of customers leaving the premises and causing issues the premises will have a dispersal policy and will implement this to ensure that customers behave properly and are mindful of local residents.

41. In relation to vermin the Applicant will have in place all of the necessary pest control measures to ensure that outbreaks are avoided. As the Applicant will be running a food business it is especially important to ensure that pests are kept out of the premises and the Applicant will do this.

**Interested Party 4 (email 23 June 2020 timed 21:41)**

42. Interested Party 4 raises issues of Cumulative Impact.

43. In relation to Cumulative Impact please refer to the Applicant's document addressing this point.

**Interested Party 5 (email 24 June 2020 timed 07:42)**

44. Interested Party 5 raises issues of Cumulative Impact.

45. In relation to Cumulative Impact please refer to the Applicant's document addressing this point.

**Interested Party 6 (email 24 June 2020 timed 15:36)**

46. Interested Party 6 raises issues of Cumulative Impact.

47. In relation to Cumulative Impact please refer to the Applicant's document addressing this point.

**Interested Party 7 (email 22 June 2020 timed 18:37)**

48. Interested Party 7 raises issues of:

- a. Cumulative Impact;
- b. Damage to residents quality of life;
- c. Damage to residents health;
- d. Litter; and
- e. Detriment to children.

49. In relation to Cumulative Impact please refer to the Applicant's document addressing this point.

50. In relation to the other points raised, so far as they haven't been dealt with above, let us assure those that have made representations that the Applicant is not some fly-by-night operation. It provides quality hotels around the country and has a commitment to becoming part of the fabric of the area. Issues that concern the Interested Parties are likely to concern the Applicant too and the Applicant will play its part in addressing those issues.

# Dalston Locke

130 Kingsland High Street

London E8

July 2020

## **Dalston Locke**

### **Executive Summary**

I am a former Metropolitan Police Borough Commander retiring at the rank of Chief Superintendent. I then spent 10 years working for a London local authority as an Assistant Director for Safer Communities (my resume is at Appendix 1).

My assessment is completely independent of the owners and the managers of the venue and I have had no prior contact with them. My primary duty as an expert is to the Licensing Sub-Committee and/or Court.

There have been a number of adverse representations in respect of the application, but none have been supported with data and evidence to back up the assertions. Even though the representation document asks for such evidence/data.

The area has a significant number of retail outlets providing food produce. They are either small independent supermarkets or large national stores. In addition, there is a renowned London street market selling food produce.

The specific location is not a crime hotspot and no crimes have been recorded at the location in the last 2 years. The Metropolitan Police representation does not have supporting data and in my view it is unreliable. Nor does it have the

required necessity and proportionality justification when seeking the removal of the non-standard hours for New Year's Eve.

Having viewed a similar establishment in another similar business/residential area and the crime data for that area there is absolutely no indication that any of the local resident concerns will come to fruition.

The venue is a hotel. It is not a vertical drinking establishment akin to a public house. It is not a nightclub or any other type of venue where the primary purpose is the sale of alcohol. The primary purpose of the venue residential accommodation. It would be completely counter productive to provide residential accommodation and then create an environment that disturbed residents.

I have no doubt that this particular venue is an exception to the policy and that it will not negatively impact on any of the 4 licensing objectives or add negatively to the cumulative impact in this area.

## **Introduction**

1. I have been asked by Luke Elford of Woods Whur to review an application by Edyn Ltd for a Premises Licence at 130 Kingsland High Street, London E8 2LQ for a venue called Dalston Locke. The venue is, or will be, a hotel.
  
2. My assessment is completely independent of my instructing solicitor and owners and the managers of the venue whom I have never met. I have no personal involvement with any business or resident in the area.
  
3. I am able to evaluate the operational environment based upon my considerable experience and qualifications. I am able to view the environment through a number of perspectives and make objective interpretations.
  
4. I have attached my personal summary at appendix (1). In brief I have been:
  - A licensing observation officer,
  - A divisional licensing Inspector on a busy and challenging London Borough,
  - The operations manager for the central London Clubs and Vice unit
  - A Detective Chief Inspector managing divisional crime investigations
  - A senior investigating Officer
  - A Borough Commander responsible for developing and delivering local policing plans that include the night-time economy challenges.

- As an Assistant Director, for 10 years, on a semi inner London Borough I was responsible for the Safer Communities portfolio that included the development and delivery of the Partnership Community Safety Strategy. I was directly responsible for the Licensing function and the night-time economy, problem solving local crime and ASB hotspots, and the development and management of Licensing policies.
5. I acknowledge that as an expert witness my primary duty is to the Court and Licensing Sub-Committee. All facts identified in this report are true to the best of my knowledge and experience. They were either witnessed or experienced by me personally or relayed to me in good faith and appear to be credible and reliable.
  6. The opinions I have expressed within in this report are honestly held and correct to the best of my judgement and belief. My fee for preparing this report is not conditional on the opinions I have stated within or the eventual outcome of the case.
  7. Prior to my assessment I was provided with;
    - The licence application.
    - Plans for the venue.
    - The police representation.
    - Environmental Health representation.
    - Community Safety representation.



- Local resident representations (7).
- Draft suggested conditions.
- A dispersal policy.
- Smoking plan.
- A waste policy.
- Security policy.
- A Locke Living Brochure.

8. I note that the venue sits within the Dalston Special Policy Area.

9. I was also aware that the venue was still in the building phase, so it was impossible to assess the operating environment in action. However, I visited the location on Wednesday the 8<sup>th</sup> July to assess the environment and the location of the venue.

10. Accepting that I could not assess the venue at 130 Kingsland High Street in its completed state I first visited a similar venue, the apartment/hotel in Leman Street, Whitechapel, Tower Hamlets. It is called Leman Locke.

11. Because there were lockdown restrictions, I confined my visit to the immediate environment, the style of the venue, and the local crime figures.

## **Visit**

12. The venue in Lemman Street is situated in a location that is very similar in many respects to Dalston. It is located in a busy multi-purpose area where there are numerous businesses, entertainment outlets, community dwellings, a vibrant street market, rail transport hubs, and road traffic.
13. The building itself was exceptionally smart, stylish, and very well appointed. It is predominantly glass fronted and it did not have any garish signs or other illuminations on the frontage. There is one modern 'Leman Locke' sign at the entrance to the building. The ultra-modern tower design blended well with the immediate surroundings.
14. The street around the building were clean and there was no detritus from the venue on the footway. The ground floor frontage was very clean, and the clear glass provided good surveillance into the building.
15. On the ground floor there was a well-appointed coffee shop.
16. I also reviewed the last 2 years' worth of crime figures for the streets around the venue on the Police UK website. There were absolutely no crimes or anti-social behaviour incidents linked to the venue or in the streets outside the venue.

17. I then travelled to Dalston and arrived at 2pm. I confined my visit to the area between Dalston Junction railway station in the south and as far north as Arcola Street.
18. Kingsland High Street runs north to south and is a main arterial route for road traffic into and out of London. The area is also well served by the London Overground service with Dalston Kingsland and Dalston Junction Stations.
19. The area between Dalston Junction and Arcola Street is highly commercialised with an assortment of retail outlets, national brand supermarkets and small independent supermarkets, a cinema, 2 significant rail hubs, a shopping centre, and a vibrant street market in Ridley road.
20. There appear to be relatively few public houses (vertical drinking establishments) in the length of Kingsland High Street that I visited. The ones that I encountered were, two near the Dalston Junction rail hub and one at the junction with Arcola Street.
21. There are a small number of public houses some distance away from Kingsland High Street and the junction with Sandringham Road. There are none in Sandringham Road or John Campbell Road.

22. However, there were a significant number of restaurants on either side of the road that were licensed premises and bars offering a wide range of cuisines.
23. The pavements on either side of the road were unobstructed and of a standard size.
24. The roads leading off, and around, Kingsland High Street are residential areas.
25. The venue, 130 Kingsland High Street, is at the junction with Sandringham Road and sits in the north east corner of the junction.
26. Opposite Sandringham Road, on the west side of Kingsland High Street, is John Campbell Road. Where this road meets the junction with Kingsland High Street it has been paved over to create a small pedestrian area. There is no traffic access to or from John Campbell Road and it is in effect a cul-de-sac.
27. The venue at 130 Kingsland High Street is under construction. It is an apartment/hotel development, appeared modern in its design and I gained the impression that it will clearly add to the residential aspect of the neighbourhood. Its primary function is residential providing long and short stay accommodation for paying guests.

28. In addition to providing residential accommodation hotels traditionally provide food and beverage facilities such as a restaurant, a bar, or both.
29. Assessing the area, I am of the view that this venue will provide a significantly different and better amenity to people that visit, work, and live in the area.
30. Its primary function is a residential one with living accommodation across all floors of the property. Whilst the intention is to provide food and a range of liquid refreshment for paying guests, members of the public will be able to avail themselves of the restaurant and bar.
31. The venue is a dwelling, not a bespoke restaurant, wine bar, night club, or vertical drinking establishment similar to a public house. As such the venue will not attract the type of clientele that are associated with the mainstream night-time economy.
32. There are guest rooms above and around the intended bar and dining facility and it would be completely counterproductive to have an area in the venue that would disrupt and cause annoyance to paying guests.

33. Clearly, I cannot comment on the specific operation at this location because the venue is still under construction and it is not operating. However, having viewed a similar establishment run by the same company there is no reason to doubt that this venue will be run and managed in the same way.
34. The operating schedule has been well thought out with considerations for the locality and the local residential community.
35. Accepting that the application is for a premises licence within a cumulative impact area this venue is definitely not similar to the other licensed outlets in the area i.e. those that exist merely to supply alcohol and food. This is a residential facility for people to reside in, and the food and liquid refreshment aspect is ancillary to the main purpose of the operation.
36. Although the application is for a licensed venue in a neighbourhood that is classified as a cumulative impact area this business is designed to have a positive impact on the area, not a negative one.
37. The nature and style of the business, the appearance of the venue, the care taken to develop the operating schedule, and the track record of the management company are clear indicators that this venue will actually have a positive impact on the area.

38. The business is residential by nature and the sale of food, liquid refreshment, and the playing of music and films is ancillary to the main purpose. The provision of food and drink is to enhance the environment for the paying guest. Therefore, to engage in any activity or allow behaviour in or near the venue that would disrupt the environment for those choosing to reside or stay in the venue would be completely counterproductive.
39. I have no doubt that this particular venue will not negatively impact on any of the 4 licensing objectives or add negatively to the cumulative impact in this area.

### **Representations**

- I have been provided with representations from the;
- Licensing Authority,
- Environmental Health,
- The Metropolitan Police and,
- Interested parties x 7.

### **Licensing Authority**

40. The representation only identifies one particular licensing objective, that of Public Nuisance. The main thrust of the representation is the fact that the application for a licence sits within the Special Policy Area of Dalston and Shoreditch and the Core Hours Policy.

41. There is no evidence that the author of the document has conducted any due diligence in respect of the applicant and the representation appears to be a blanket objection based upon the existence of the Special Policy Area. I am not of the view that is sufficient basis of objection and putting my council hat on for a moment, I would have been very disappointed if one of my officers had submitted such an objection.
42. The only supporting evidence is the Statement of Licensing Policy. There are also some suggested actions and measures that have been put forward for discussion with the applicant.
43. The previous license for the address was a licence for 'Off Sales'. My previous experience, whilst not suggesting that the previous license holder was anything but scrupulous, enables me to make the following observation. When balancing the community outcomes that result from the existence of an 'Off sale' outlet against that of a well-appointed hotel. The potential impact from anti-social behaviour at the location is likely to be significantly less from a hotel than the 'off sale' outlet.
44. The types of problems associated with 'Off Sale' outlets are, under-age drinking, street drinking, pre-loading and a raft of other acts of anti-social



behaviour. The interested party representations tend to indicate that ASB was an issue in this particular area. This type of behaviour is not linked to well-run quality hotels that do not provide an 'off sale' facility.

45. In the absence of any other due diligence or assessment of the applicant I visited the groups venue in Leman Street E1. Whilst the area is currently suffering the effects of the Covid19 business restrictions and I could not assess the venue as it operates normally in the locally community, I could assess the nature and appearance of the venue.
46. As highlighted in the Statement of Licensing Policy, the quality and track record of the group and their good character is not sufficient. However, it does provide an indicator that provides some insight into how the venue in Kingsland High street will be managed.
47. The Leman Street venue was exceptionally well appointed. There were no garish lights advertising the building or facilities. No music emanated from the building. The ground floor was glass walled providing good surveillance/or view into the venue where there was a well-appointed coffee shop. The pavements outside of the building, on all sides, were clean and clearly well maintained.

48. In respect of the application for Kingsland High Street the applicant has demonstrated a clear understanding and knowledge of the licensing objectives. The proposed conditions seek to compliment and improve the quality of the environment that residents have experienced in the past. Specifically;

- Licensable activities shall be ancillary to the use of the premises as a hotel,
- There is no 'Off sale' facility so the issues associated with 'Off Sale' outlets are removed.
- Residents and other customers will not be permitted to take their drinks outside the venue.
- There are no street tables and chairs.
- A noise limiter will be fitted to ensure that residents do not experience a noise nuisance. It will be securely contained, and no interference with the sound levels will be permitted. In addition, any additional sound generating equipment will be routed through the sound limiter device.
- All windows and external doors shall be closed at any time when regulated entertainment takes place.
- No noise generated by plant or equipment shall emanate from the building no vibration transmitted through the structure so as to give rise to a nuisance.
- No fumes, steam, or odours shall be emitted from the licensed premises so as to cause a nuisance.
- There will be dispersal policy for the hotel.
- There will be measures in place to ensure that litter and waste are prevented or removed from the area immediately outside the premises. The area will be swept and or washed, and litter and sweepings collected

and stored in accordance with the approved refuse storage arrangements by close of business.

- Any smokers outside the venue will be supervised by staff to ensure that the activity is orderly and does not obstruct the pavement.
- That any movement or collection of waste etc will not occur between 23.00 and 07.00 the following day.

49. In addition to the responsible nature of the operating schedule I note that the applicant has adopted the Core Hours as set out in the Statement of Licensing Policy LP3. If the license is granted it will enable the operator to demonstrate the effectiveness of the operating schedule and the responsibility of management operating a hotel in this location.

50. With the core hours in place and the existence of an operating schedule that clearly demonstrates the ability and desire to manage public nuisance I have no doubt that the venue will not have a negative impact on any of the 4 Licensing Objectives or contribute negatively to the cumulative impact in the area. And recognising that there is no longer an 'Off Sale' outlet at this location there is every possibility that there will be an improvement in the perceived ASB issues complained of.

### **Environmental Health.**

51. As with the Licensing Authority the only Licensing Objective issue raised in the representation is one of Public Nuisance.

52. The content of the representation amounts to 6 areas that the service would require to be addressed prior to any licence being granted. These have already been addressed and they are areas that don't really need to be enshrined as licence conditions as there are other regimes in place to deal with them.

53. The operator has a procedure that sets out handling and preparing waste disposal. It is in document form and will be displayed in the building when it opens. All staff will be trained as appropriate.

- The most appropriate waste management contract is in place and only the correct receptacles will be used.
- No waste will be collected between 23.00 and 07.00 and the contracted times will be adhered to.
- Customers will not be permitted to take drinks outside the hotel and there will be no bottles and glasses left outside the venue. There will be measures in place (see operating schedule) to ensure that litter and waste are prevented or removed from the area immediately outside the premises. The area will be swept and or washed, and litter and sweepings collected and stored in accordance with the approved refuse storage arrangements by close of business.
- Smokers will be provided with a safe receptacle to place their cigarette ends. Smokers will be supervised by a member of staff and any litter or waste will be removed.
- There is a trade waste agreement that clearly identifies the issues raised and will be clearly displayed when the venue opens.

54. It is clear that the operator has addressed all of the concerns raised in the representation by the Community Safety and Enforcement Service and most do not require licence conditions as they are duplicated by other regimes. Therefore, if the license were to be granted the operator would not negatively impact upon the licensing objective highlighted in this representation.

### **Metropolitan Police**

55. The officer making the representation specifically objects to the granting of the licence and has identified 2 Licensing objectives.

56. The document setting out how to make the representation provides the author (the person objecting or making the representation) with the opportunity to provide evidence in support of their claim.

57. Given the availability of crime/asb data for the area, along the requirement of those in authority, to set out the necessity and proportionality of their decisions. I would have expected the representation to be supported with some specific data rather than the officers 'view'. I would have also expected some rationale that supports the necessity and proportionality of the decision to object.

58. As a consequence, I have been unable to assess the comment that references the 'alleged rapid increase in licensed premises and the timeframe over which this has taken place'.
59. There is also the claim that there has been a substantial rise in the amount of alcohol related crime, ASB, and disorder. Again, there is no data to support the contention that this is the case.
60. I have reviewed both the Metropolitan Police crime data and the Police UK data for the Safer Neighbourhood Ward for Dalston.
61. The Metropolitan Police data does not allow for street-based assessments as it only presents the data by the ward as a whole. I have therefore based my review on the Police UK data that provides street-based statistics extrapolated from data supplied by the Metropolitan Police.
62. The ASB data for Dalston throughout 2018, 2019 and for January and February of 2020 does not show any significant increase in the levels of ASB. Additionally, there are no reports of ASB at the location of Kingsland Road and Sandringham Road. The hotspots for ASB remain relatively constant and the main drivers appear to be the transport hub and the shopping centre.

63. There was a significant rise in ASB through March, April, and May which may be what the officer is referring to!
64. However, it would be quite wrong to point to licensed premises as being the trigger for such behaviour as they were closed throughout this period due to the Covid19 restrictions. So, there must be another reason for the ASB increase not the presence of licensed premises.
65. Over the same period the incidents of Public Order remained relatively constant and low. There were no incidents around Sandringham Road and the key area for public order appeared to be the transport hub.
66. The officer doesn't define alcohol related crime and there is no such category on either data base. So, setting aside ASB and Public Order I looked at the incidents of Violence as recorded over the same period. There has been no significant or substantial rise in such incidents and the level of incidents recorded remains relatively stable. The recorded violent crime levels for February in 2018, 2019, and 2020 were 29, 27, and 34 respectively.
67. The officer cites an ever-increasing rise in the number of applications for licenses which I cannot comment upon because there is no data to consider.

However, I note that there was an 'off sales' license at this location so technically there would be no increase at this location.

68. The Police propose that the hours of operation align with the Core Hours policy in the Statement of Licensing policy. It would be prudent for the applicant to initially apply for the licence in line with the core hours thus enabling the venue to demonstrate the commitment to the Licensing Objectives and showcase their management expertise and effectiveness running a responsible and conscientious venue.
69. The police make reference to an outside area and questions how it will be managed. There is no outside area. There is a restaurant for hotel guests and other paying customers. It is within the confines of the building and is covered by a glass roof.
70. In respect of condition 16 the smoking area, there will be 2 that will separate customers from staff. The staff smoking area is in Sandringham Road and the guest area is in Kingsland High Street. The operators have stipulated that both of the areas will be monitored and supervised by a member of staff to ensure that there is no obstruction of the highway and no public nuisance.



71. Condition 19 has been removed as there is no proposed outside area for the venue.
72. In proposing the removal of the non-standard hours for New Year's Eve the police use the rationale that police have seen large scale disorder in Dalston during the event. No data has been submitted to support the claim. The Metropolitan Police Neighbourhood data and the Police UK data does not provide any data that is specific to New Year's Eve. It is only published by calendar month.
73. I have analysed the yearly data for ASB, Public Order, and Violence from 2017 to 2020 analysing the months of both December and January given that New Year's Eve falls into this period and I benchmarked it against the summer months of June and July.
74. I found that there is no significant increase in these particular months compared to the rest of the year. The data doesn't correlate with the claim nor does it indicate that there has been large scale disorder in Dalston.
75. In fact, the data for the summer months over the same period indicates that the summer months are more problematic than the new year period.

76. I have set out the crime figures for the period over the new Year and the summer months in the following grid. The figures highlight the crimes recorded on the Police UK website, as provided by the Metropolitan Police.

77. I selected the crime types ASB, Public Order, and Violence as the crimes that are potentially linked to alcohol and may be referred to as alcohol related crime.

78. The prevalence of these types of crime appear to be more of an issue during June and July rather than New Year's Eve as suggested in the representation.

Months of the year.	Year	Recorded Public Order	Recorded ASB	Recorded Violence	Totals for the 3 categories	
Dec/Jan	2017/18	10/15	30/34	33/31	74/80	
	2018/19	14/8	36/49	30/28	80/85	
	2019/20	14/16	43/48	29/28	86/92	
						240/257
June/July	Year	Public Order	ASB	Violence	Totals	
	2017	23/14	75/53	62/56	160/123	
	2018	19/10	43/37	65/32	127/79	
	2019	15/22	41/61	29/50	85/133	

		372/335	707
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79. The data for December and January highlights a very small increase of 24 offences when comparing 2017/18 against 2019/20. The more prevalent months for this type of activity June and July indicates a reduction from 283 offences in 2017 to 218 offences in 2019.
80. However, it does indicate that the summer months are more problematic than the Christmas period. New Year's Eve events are supported by a pan London policing response and the event is not unique. It has been managed continually and consistently by the MPS, and I see no evidence in the crime data that supports the claim of large-scale disorder.
81. Neither can I see the necessity, or the proportionality rationale set out in the request to remove the non-standard hours.
82. The reference to Covid19 has the appearance of being a makeweight in the representation. At the moment the venue is still under construction and is some way off opening. The current Covid19 restrictions may well have varied between now and the opening of the venue. If the licence is granted then, before the venue opens, the operators will conduct a Covid risk assessment in line with the current Government guidance/regulations in place at the time.

83. I have previously highlighted the responsibility of the operator, reviewed a similar venue as a benchmark, and reviewed the operating schedule.

84. I have absolutely no doubt that this venue will not adversely impact upon any of the 4 Licensing Objectives, and that the style of the venue will add to the ambience of the locality.

### **Interested Parties**

85. I have been provided with 7 representations from local residents. The main themes in each of the representations have a common thread. Therefore, instead of dealing with each issue raised in each representation I have collated the main themes into the following grid to comment on each topic.

<b>Residents Representations</b>	
<b>Issue</b>	<b>Comment</b>
Introduction of a large club to the location	There seems to be a misconception that the venue is a night club, which is not the case. The licence will align with the core hours policy and allows residents to purchase a drink while staying at the hotel, and for local residents to use the restaurant and bar. It is not a night club and will not operate as such.

<p>Large club operating 24/7</p>	<p>The venue is a hotel providing food and drink to residents as the other hotels across London do.</p>
<p>Major source of noise</p>	<p>When citing the problem of noise, the representations refer to residents experiencing the perceived problem. Perhaps the point that is missed is that the hotel is a residential property and that people will be living there. It would be completely counterproductive to have a residential property (a hotel) where there is loud noise keeping the paying guests awake at night. Looking at the plans there appear to be rooms on every floor of the building, so a major noise source is not something that the proprietors would want to contend with, and paying guests would not put up with it.</p> <p>In addition, there will be a noise limiter fitted to ensure that any noise levels from music in the bar and restaurant will not cause a nuisance. The limiter cannot be tampered with and only calibrated with the express permission of council officers.</p> <p>There is also a condition to ensure that plant noise in the building will not cause a nuisance to residents.</p>
<p>Cumulative impact of ASB</p>	<p>All of the community representations are concerned with the cumulative impact of ASB when the hotel opens. Whilst it is impossible to identify problems</p>

	<p>with a venue that has not operated at the location, I sought to review the performance of another venue operating as an identical business model in a very similar residential and commercial setting. I first visited the Lemman Locke in Whitechapel, Tower Hamlets. The venue was exceptional well presented, the streets around the building were exceptionally clean, and there was a coffee shop on the ground floor. I then reviewed the crime data presented on the Police UK website. The data is street based and identifies crime hotspots at particular locations. I reviewed the data from May 2020 back to January 2018 and there have been no crimes reported outside the venue or in the streets close to the venue.</p>
<p>The crossroads at Kingsland High Street and Sandringham Road is already a crime hotspot</p>	<p>A number of representations cite the actual junction of Kingsland High Street and Sandringham Road as a crime hotspot. I have reviewed the crime data on the web supplied by the Metropolitan Police in respect of neighbourhood data for Dalston. And the data provided on the on the Police UK website.</p> <p>The Metropolitan Police data tends to be ward specific and it does not allow for street-based crime analysis. However, the Police UK website uses</p>

	<p>Metropolitan Police data and identifies particular hotspots in Neighbourhoods and allows for street-based assessments.</p> <p>I reviewed the full year data for 2018 and 2019.</p> <p>There were clearly a number of crime hotspots in the Dalston neighbourhood but not at the junction with Kingsland High Street and Sandringham Road. In fact, the 2-year data did not highlight any crimes or ASB at this location.</p>
<p>Public urination, vomiting, defecation, graffiti, drug use and dealing, noise, litter, and disturbances.</p>	<p>These behaviours are not the behaviours that are associated with hotels. The Police UK website publishes Metropolitan Police crime data at street level. It does highlight crime hotspots around the Dalston ward, but no crime has been recorded at this location. I have conducted a similar piece of analysis at another venue owned by the company that is in a similar location. The data shows that from January 2018 through to 2020 there were no issues of ASB at all around the venue.</p>
<p>Change of use.</p>	<p>The alleged change of use is not something that I will comment upon as it does not relate to the alcohol licence.</p>
<p>Shopping facilities.</p>	<p>The site was originally occupied by a Tesco store with, presumably, a licence permitting 'Off Sales'.</p>

	<p>Despite the closure of the Tesco store there are still ample shopping facilities in the immediate area.</p> <p>There are a number of small independent supermarkets/stores. There is a Marks and Spencer food hall, a Sainsbury's, an Iceland store, and an iconic street market in Ridley Road that sells food produce. It is open from Monday through to Saturday.</p>
<p>People being forced on to narrow pavements.</p>	<p>The pavements around the location appear to be consistent along the length of Kingsland High Street.</p> <p>In addition, the footfall into and out of a hotel is likely to be considerably less than the footfall into and out of a Tesco store.</p>
<p>Cycle lane.</p>	<p>The cycle lane issues are not in my view, linked to the application and I do not propose to make any comment on the issue.</p>
<p>Crowds that gathered in Tesco car park will move across the road.</p>	<p>The comment tends to suggest that people used to gather around the Tesco store. However, the crime statistics do not highlight a crime problem at that location. If people did gather at that location, for whatever reason, the development of the hotel is a good example of how to design out problem areas.</p>
<p>Predatory clients.</p>	<p>When making such serious allegations or comments the individual should support such an allegation with</p>



	<p>evidence and examples of such behaviour. I have searched the 'web' and can find no such reference to the company or the individual buildings owned by them. In my opinion this is an unfounded, unsupported and potentially defamatory comment.</p>
<p>It is a highly residential area.</p>	<p>While the High Street appears to be a mixture of retail properties with residential dwellings above the outlets, the surrounding streets are largely residential. The apart/hotel is itself a residential building with the facility to accommodate long term guests on every floor</p>
<p>Application made during the Covid-19 lockdown period.</p>	<p>Council policies and procedures are clear and transparent. The timing of the application will not have affected the process applied by the licensing authority.</p>
<p>The concentration of licensed premises will increase in the area.</p>	<p>I am led to believe that there was a Tesco store on the site. I make the presumption that the store had an alcohol licence for off sales.</p>
<p>Infestation and unpleasant smells.</p>	<p>The venue has a waste management policy. If the licence is granted there will be a condition on the licence to ensure that there will be no fumes, steam, or odours that emanate from the licensed premises.</p> <p>The building is residential with a food outlet. It is not in the company's interest to find themselves with</p>

	any form of infestation and all of the industry precautions will be taken.
The venue will add to the drug dealing in the location.	In my experience this type of venue does not add to the drug dealing issues. It is a smart apart/hotel with security. There is a security policy that includes patrolling and there will be a comprehensive CCTV system. When problem solving crime and ASB hotspots such developments have the impact of reducing the type of crime experienced by residents.

## Conclusion

The venue is a hotel, it is a new stylish residential building that will accommodate paying guests. It is not a vertical drinking establishment identical to that of a public house, nor is it a night club or any other type of venue primarily built for the night-time economy and entertainment.

It is not an alcohol led venue. The draw to this building is accommodation, where paying customers will, hopefully, be able to purchase food and beverage in a place where they are residing, without the need to go out and add to the local night-time economy. I know of no other hotel that does not have such a facility.

There have been a number of adverse representations in respect of the application, but none have been supported with data and evidence to back up the assertions. Even though the representation document asks for such evidence/data.

The area has a significant number of retail outlets providing food produce. They are either small independent supermarkets or large national stores. In addition, there is a renowned London street market selling food produce.

The specific location is not a crime hotspot and no crimes have been recorded at the location in the last 2 years. The Metropolitan Police representation does not have supporting data and in my view it is unreliable. Nor does it have the required necessity and proportionality justification when seeking the removal of the non-standard hours for New Year's Eve.

Having viewed a similar establishment in another similar business/residential area and the crime data for that area there is absolutely no indication that any of the local resident concerns will come to fruition.

I have no doubt that this particular venue will not negatively impact on any of the 4 licensing objectives or add negatively to the cumulative impact in this area.

## Appendix 1

### **Personal summary**

I retired from the Metropolitan Police in January 2007 having served 34 years of exemplary service. Throughout my service I have been regularly involved in the enforcement, management, and development of licensing initiatives and policies. I retired as a Borough Commander.

As a constable I worked as an undercover officer detecting offences in late night licensed premises in central and west London. As an Inspector I was the licensing Inspector for a very busy inner London policing division.

Whilst working as a Chief Inspector I was the operations manager in the central London Clubs and Vice unit from 1990-1996. As part of this role I had responsibility for late night licensing in Westminster and I supported other London boroughs as appropriate. During this period, I managed both covert and overt police operations on behalf of the police and the local authority to ensure compliance with the legislation and to prosecute breaches where necessary. The overt licensing visits were structured in a way that ensured that all premises operating with late night licences received at least 4 visits a year from a joint licensing team of police officers and local authority officers. It was during this period that I was involved in the development of the initial licensed door supervisors scheme, commissioned by Westminster City Council, which was implemented and managed by myself within the Clubs and Vice unit. During the same period I researched, with a local authority counterpart, the potential for the introduction of 'Lap Dancing' clubs in Westminster. The work resulted in the introduction of 'lap dancing' establishments in the borough. The initiative and the supervision of the licence was then monitored covertly and overtly by officers under my direction.

As a Borough Commander on 2 London boroughs, between 2001 and the beginning of 2007 (January), I worked with both local authorities to develop the respective licensing and enforcement policies. The work with the Local Authority formed a significant part of Community Safety and local policing plans. With the introduction of the new Licensing Act 2003 I oversaw the transfer of responsibilities to the local

authority and was instrumental in setting up a joint licensing team for a busy inner London borough.

In 2007 having retired from the police I was employed by an inner London Local Authority as an Assistant Director for Safer Communities. I held this post for 10 years.

As the Assistant Director I had responsibility for crime reduction strategies and the enforcement functions for the authority. These included the Licensing, Trading Standards, and the Environmental Health Teams (including noise). My work involved comprehensive partnership working with all agencies involved in the crime reduction partnership, problem solving local hotspots and environmental audits with the associated action plans.

During the 10 years that I spent with the authority I worked closely with the local policing teams to ensure that licensed premises were effectively supervised and managed in line with local initiatives and the borough licensing and enforcement policies.

As the principal officer for licensing in the local authority I worked closely with local community groups, ward councillors, and members of the licensing committee to develop knowledge and understanding of local enforcement policies and crime and disorder initiatives linked to drugs and alcohol. The work included the supervision of licensed premises, the management of the licensing objectives and working with legal services to take appropriate and proportionate action where necessary.

I was responsible for delivering a structured approach to licensing management, supervision, and enforcement, the council's community safety plan, the enforcement policy, and licensing policy. My role also included the consultation, development, and delivery of the boroughs' controlled drinking zone, cumulative impact zone, Sexual Entertainment Venues, late night levy, early morning restriction orders, Best Bar None, and alcohol treatment programmes. I was the Authorising Officer for all covert surveillance, under the Regulation of Investigatory Powers Act.

On my retirement from Local Government I set up my own compliance consultancy and offer independent advice, compliance audits, and risk assessments for licensed premises. I have given evidence at licensing hearings/reviews, and appeals on behalf

of the Metropolitan Police, Local Authorities and individual premises in each of my respective roles.

I have a Masters Degree in Business Administration, I am a member of the Institute of Licensing, and I have personal alcohol licence. I have also been trained in Strategic Emergency and Crisis Management (Cabinet Office EPC), Emergency Control Management (Cabinet Office EPC), Gold Support London Emergency Planning (LLAG), and I was a qualified Authorising Officer for Covert surveillance in both the police and Local Authority.

## Luke Elford

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**From:** Kerrie.L.Ryan@met.police.uk on behalf of HackneyLicensingUnit-GN@met.police.uk  
**Sent:** 12 August 2020 09:28  
**To:** licensing@hackney.gov.uk; ashton.liburd@hackney.gov.uk;  
shan.uthayasangar@hackney.gov.uk  
**Cc:** sanaria.hussain@hackney.gov.uk; Luke Elford  
**Subject:** Application for a Premises Licence at Dalston Locke, 130 Kingsland High Street, London, E8 2LQ

Dear Colleagues,

Police would like to withdraw our representations in relation to the application for a Premises Licence at Dalston Locke, 130 Kingsland High Street, London, E8 2LQ.

Police and the applicant have agreed the following;

- the hours for licensable activity in relation to non residents will match LP3 e.g. 23:00 Mon to Thurs, 00:00 Friday and Saturday and 22:30 on Sunday and closed 30 minutes later.(Condition 4 of proposed conditions submitted by the applicant will need to be amended).
- Condition 19 of proposed conditions from the applicant will need to be removed as there is no outside space.
- The non-standard hours for NYE to be amended to licensable activities ceasing at 0200hrs and the premises being closed to non-residents 30 minutes later.

Kind regards



PC Kerrie Ryan  
**Central East Licensing Unit**  
Metropolitan Police Service (MPS)  
T: 020 7275 3022 Int: 753022 Email  
[kerrie.ryan@met.police.uk](mailto:kerrie.ryan@met.police.uk)  
A: Licensing Office, Second Floor, Stoke Newington  
Police station, 33 Stoke Newington High Street, London,  
N16 8DS



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## Luke Elford

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**From:** Jacey Frewin <jacey.frewin@hackney.gov.uk>  
**Sent:** 10 August 2020 12:21  
**To:** Luke Elford; Licensing (Shared Mailbox)  
**Subject:** Re: Edyn Ltd - 130 Kingsland High Street - Application for a Premises Licence

Yes, that's fine.

Licensing, please see the attached condition which the applicant has agreed  
I would now like to withdraw my representation.

Kind regards

## Jacey

Jacey Frewin  
Community Safety & Principal Enforcement Officer  
Shacklewell & Stoke Newington  
London Borough of Hackney  
Hackney Service Centre  
1 Hillman Street  
London E8 1DY  
[email:jacey.frewin@hackney.gov.uk](mailto:jacey.frewin@hackney.gov.uk)  
Tel:0208 356 4567

On Mon, 10 Aug 2020 at 12:04, Luke Elford <[Luke@woodswhur.co.uk](mailto:Luke@woodswhur.co.uk)> wrote:

Hi Jacey,

3. is the condition that you put in your objection, but I am happy with your alternative proposal.

So these 5 conditions to be added to the operating schedule and you to withdraw... agreed?

1. The Licensee shall ensure that all staff are fully trained and made aware of the legal requirement of businesses to comply with their responsibility as regards the disposal of waste produced from the business premises. The procedure for handling and preparing for disposal of the waste shall be in writing and displayed in a prominent place where it can be referred to at all times by staff.

2. The Licensee shall ensure that any contract for general and recyclable waste disposal shall be appropriate in size to the amount of waste produced by the

business. The Licensee shall maintain an adequate supply of waste receptacles provided by his registered waste carrier (refuse sacks or commercial waste bins) in order to ensure all refuse emanating from the business is always presented for collection by his waste carrier and shall not use any plain black or unidentifiable refuse sacks or any other unidentifiable or unmarked waste receptacles.

3. The Licensee's premises are situated in an area within which refuse may only be left on the public highway at certain times (time bands). If the Licensee's waste carrier cannot or does not comply by collecting the refuse within an hour after the close of any time band imposed by the waste authority, the Licensee must remove the refuse from the public highway and/or keep it within the premises until such time as his/her waste carrier arrives to collect the refuse.

4. The Licensee shall instruct members of staff to make regular checks of the area immediately outside the premises and remove any litter, bottles and glasses emanating from the premises. A final check should be made at close of business.

5. The Licensee shall provide a safe receptacle for cigarette ends to be placed outside for the use of customers, such receptacle being carefully placed so as not to cause an obstruction or trip.

Kind regards,

Luke

**From:** Jacey Frewin [mailto:[jacey.frewin@hackney.gov.uk](mailto:jacey.frewin@hackney.gov.uk)]

**Sent:** 10 August 2020 11:52

**To:** Luke Elford <[Luke@woodswhur.co.uk](mailto:Luke@woodswhur.co.uk)>

**Subject:** Re: Edyn Ltd - 130 Kingsland High Street - Application for a Premises Licence

Hi Luke,

I am happy to adhere to all that, except condition 3, which I wish to be worded

The Licensee's premises are situated in an area within which refuse may only be left on the public highway at certain times (time bands). If the Licensee's waste carrier cannot or does not comply by collecting the refuse within an hour after the

close of any time band imposed by the waste authority, the Licensee must remove the refuse from the public highway and/or keep it within the premises until such time as his/her waste carrier arrives to collect the refuse.

with regard to condition 6, we can delete that altogether, but as Kingsland High Street is time banded, I would like to stick to the original

wording.

What do you think?

Kind Regards

## Jacey

Jacey Frewin

Community Safety & Principal Enforcement Officer

Shacklewell & Stoke Newington

London Borough of Hackney

Hackney Service Centre

1 Hillman Street

London E8 1DY

[email:jacey.frewin@hackney.gov.uk](mailto:jacey.frewin@hackney.gov.uk)

Tel:0208 356 4567

On Mon, 10 Aug 2020 at 11:27, Luke Elford <[Luke@woodswhur.co.uk](mailto:Luke@woodswhur.co.uk)> wrote:

Dear Jacey,

I have spoken to my client and we are happy to agree the following if you will withdraw your objection:

1. The Licensee shall ensure that all staff are fully trained and made aware of the legal requirement of businesses to comply with their responsibility as regards the disposal of waste produced from the business premises. The procedure for handling and preparing for disposal of the waste shall be in writing and displayed in a prominent place where it can be referred to at all times by staff.

2. The Licensee shall ensure that any contract for general and recyclable waste disposal shall be appropriate in size to the amount of waste produced by the business. The Licensee shall maintain an adequate supply of waste receptacles provided by his registered waste carrier (refuse sacks or commercial waste bins) in order to ensure all refuse emanating from the business is always presented for collection by his waste carrier and shall not use any plain black or unidentifiable refuse sacks or any other unidentifiable or unmarked waste receptacles.
3. In order to minimise the amount of time any waste remains on the public highway in readiness for collection, the Licensee will ensure the timeframe within which it may expect its waste carrier to collect is adhered to.
4. The Licensee shall instruct members of staff to make regular checks of the area immediately outside the premises and remove any litter, bottles and glasses emanating from the premises. A final check should be made at close of business.
5. The Licensee shall provide a safe receptacle for cigarette ends to be placed outside for the use of customers, such receptacle being carefully placed so as not to cause an obstruction or trip.
6. The current trade waste agreement/duty of care waste transfer document shall be conspicuously displayed and maintained **at the premises in a position where it can be shown to those who wish to see it** ~~in the window of the premises where it can be conveniently seen and read by persons standing in Dalston.~~ This should remain unobstructed at all times and should clearly identify:-
  - the name of the registered waste carrier
  - the date of commencement of trade waste contract
  - the date of expiry of trade waste contract
  - the days and times of collection

the type of waste including the European Waste Code

My client does not want to have to display the trade waste agreement in a window as that would not be in keeping with its brand. It is happy to display the trade waste agreement, just not there.

Please let me know if that is acceptable.

Kind regards,

Luke

Luke Elford

Woods Whur 2014 Limited

Tel: +44 (0)113 234 3055 / Mob: +44 (0)7702 802594 / Twitter: @Luke\_WoodsWhur

[luke@woodswhur.co.uk](mailto:luke@woodswhur.co.uk)

Woods Whur 2014 Limited, St James's House, 28 Park Place, Leeds LS1 2SP

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[www.nhs.uk/coronavirus](http://www.nhs.uk/coronavirus)

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[www.nhs.uk/coronavirus](http://www.nhs.uk/coronavirus)

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## **Introduction into Edyn**

- Formed in 1997.
- Industry pioneer in extended stay living.
- Now operating in London, Manchester and Edinburgh.
- Ambitious growth plans including a portfolio of 9 properties under the Locke brand, comprising over 1500 rooms.
- On target to create 1000 new jobs over the next 5 years.
- Committed to better meeting the needs of the modern traveller.
- People driven culture.

## **Ethos**

- To engage with a new type of traveller with an expectation of personal awakening.
- Celebrating the character and social fabric of each locality.
- Creating destinations through mindful design.
- The belief that travel should be a journey of discovery.
- To only work with the most interesting and vibrant of partners to provide the right type of guest experience.

**Edyn Ltd**

**Key Personnel**

**Chief Executive Officer**

Stephen McCall

**Chief Development Officer**

Eric Jafari

**Chief Financial Officer**

Daniel Carre-Bishop

**Operations Director**

Chantal Robinson

**Development Manager**

Chris Penabad

**Development Associate**

Laura Threapleton

**Director of Openings**

Matthew Brierley

**General Manager (Dalston Locke)**

Catherine Guest

## Luke Elford

---

**From:** [REDACTED]  
**Sent:** 13 August 2020 09:58  
**To:** Luke Elford  
**Subject:** Kingsland Locke alcohol license application

To Hackney Licensing Team,

I am writing in support of an alcohol license Kingsland Locke, the new hotel development in Dalston. As a Hackney resident it is great to see new business coming to the area. Having worked at The Hoxton in Shoreditch for many years, I can see what a vibrant hub can be created by a hotel that welcomes the local community and supports it by working with locals to curate a cultural events programme. The hotel is going to also offer employment in the local area, which is now of even greater importance as so many businesses have been affected by the COVID 19 pandemic.

We want Dalston to remain a vibrant and interesting area for locals and also for friends and families of locals to visit. There is currently only one hotel in Dalston and Premier Inn as a brand do not have a community focus which is something that Locke can offer. The bar and restaurant will be the hub of the hotel and knowing the Locke brand, alcohol will be served responsibly with the desired outcome being a welcoming environment to all, but also a peaceful place for guests and long term residents to work, sleep and live.

Regards,

[REDACTED]

[REDACTED]



## Luke Elford

---

**From:** [REDACTED]  
**Sent:** 14 August 2020 19:08  
**To:** Luke Elford  
**Subject:** Loch application

To Hackney Licensing Team,

I have recently learned that a hotel is planned in the old Tesco's site on Kingsland Road. I understand it is hard to get licenses in this area and I am writing in support of this new development. Dalston is lacking in hotels and having read up on the Locke brand I understand they have a community focus and will be a great addition to the area. Most importantly I support any business coming into the area at a time of serious unemployment. The hotel will provide jobs and career opportunities for locals.

I don't believe the hotel poses a threat to other local businesses or the neighbourhood and believe that their community focussed approach is well fitting to the area.

Yours sincerely

[REDACTED]

**Luke Elford**

---

**From:** [REDACTED]  
**Sent:** 13 August 2020 15:03  
**To:** Luke Elford  
**Subject:** Locke application

To Hackney Licensing Team,

I am writing to support the license application for Kingsland Lock on Kingsland High Street. As a mother with a young baby I think it will be great to have a multi-functional space in Dalston, a safe and hospitable environment with plenty of space and open to all. It is often difficult to find somewhere in the area that has enough space to meet friends with children, where you can enjoy a coffee, a glass of wine and some food. Most of the existing spaces in Dalston are either too small or have one purpose – drinking or eating – but not somewhere where you can hang out and relax with no pressure to consume anything.

Regards,

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]  
[REDACTED]

[REDACTED]

[REDACTED]  
[REDACTED]  
[REDACTED]

[REDACTED]

## Luke Elford

---

**From:** [REDACTED]  
**Sent:** 13 August 2020 19:36  
**To:** Luke Elford  
**Subject:** Kingsland Locke Licence

Dear Hackney Licensing Team,

I am writing you this time in support of an alcohol license Kingsland Locke, the new hotel development in Dalston.

As a recently became Hackney resident it is wonderful to see a new business opening in the area, especially during this time affected by coronavirus. I have seen over the years working in East London that a newly opened hotel can create a fresh, interesting setting to any neighbourhood. Knowing the Locke brand and its mission on creating safe and stylish environments for guests with a strong focus on local communities, working alongside with them to support and preserve Dalston's identity, I am sure that alcohol will be served responsibly and respectfully. The hotel's restaurant and bar is going to be a great addition to Dalston's lively High Street by welcoming locals and creating a pleasant place for both resident and guests.

Kind Regards,

[REDACTED]

[REDACTED]

[REDACTED]

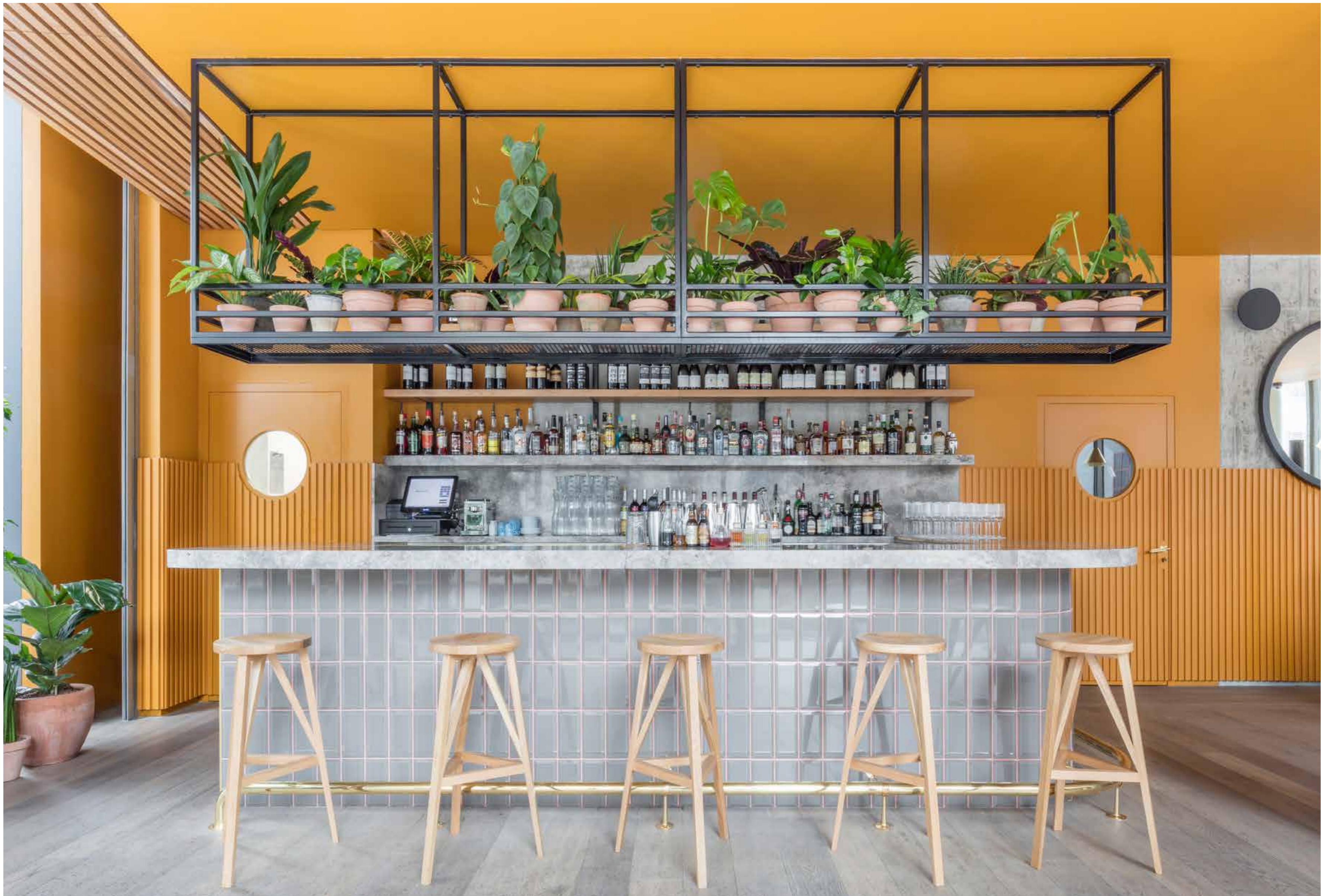
[REDACTED]



A little bit about  
*Locke*



We create aparthotels and hotels rooted in the local architecture and social fabric of the area. We believe that we can improve modern day travel by delivering design-led private spaces linked to socially immersive public spaces, activating the communities that surround them.



# LEMAN LOCKE



## LEMAN LOCKE

Leman Locke is a design-led aparthotel for those who want to challenge the status quo, and experience the unique and authentic.

Designed for travellers for whom a bed and shower in a shoebox isn't enough, Leman Locke immerses you in its neighbourhood's culture through socially immersive public spaces that connect you to a community of like-minded locals and travellers.





# LEMAN LOCKE

**The Telegraph**

“From décor to staff every inch of this 22-floor aparthotel oozes the perfect mix of personality, trendiness and convenient luxury”

**The Guardian**

“The last dish to land on my table is a ray of sunshine....a bunch of simple things done exceedingly well, which describes the whole of my lunch at Treves & Hyde in the City”

**designmilk**

“If only more design hotels were like Leman Locke, a future facing hospitality concept that blends the best aspects of lifestyle hotels with serviced apartments”

**ELLE DECORATION**

“This forward-thinking hospitality concept is bridging the gap between home and hotel stay by blending the best elements of lifestyle hotels with serviced apartments”

**Red**

“Clean and modern, comfortable but minimal. Having everything perfectly in its place made me crave a life of essential-ism, throwing out all the stuff that accumulates in the modern house”

**VIVA LIFESTYLE & TRAVEL**

“Decor goals: this London hotel is the definition of Chic. Whitechapel London has officially won the gold medal for boutique hotels”



## ROOMS & SUITES

Although our suites are a tad smaller than your typical serviced apartment, they have been designed to feel a lot larger. We agree that space for the sake of space alone is worthless. For this reason, we have assembled your space to include the necessities:

Super fast free WiFi

Smart TV (w/ Apple TV & HDMI)

Locke Dream Bed

Fully equipped kitchen (including utensils & dishes & dishwasher)

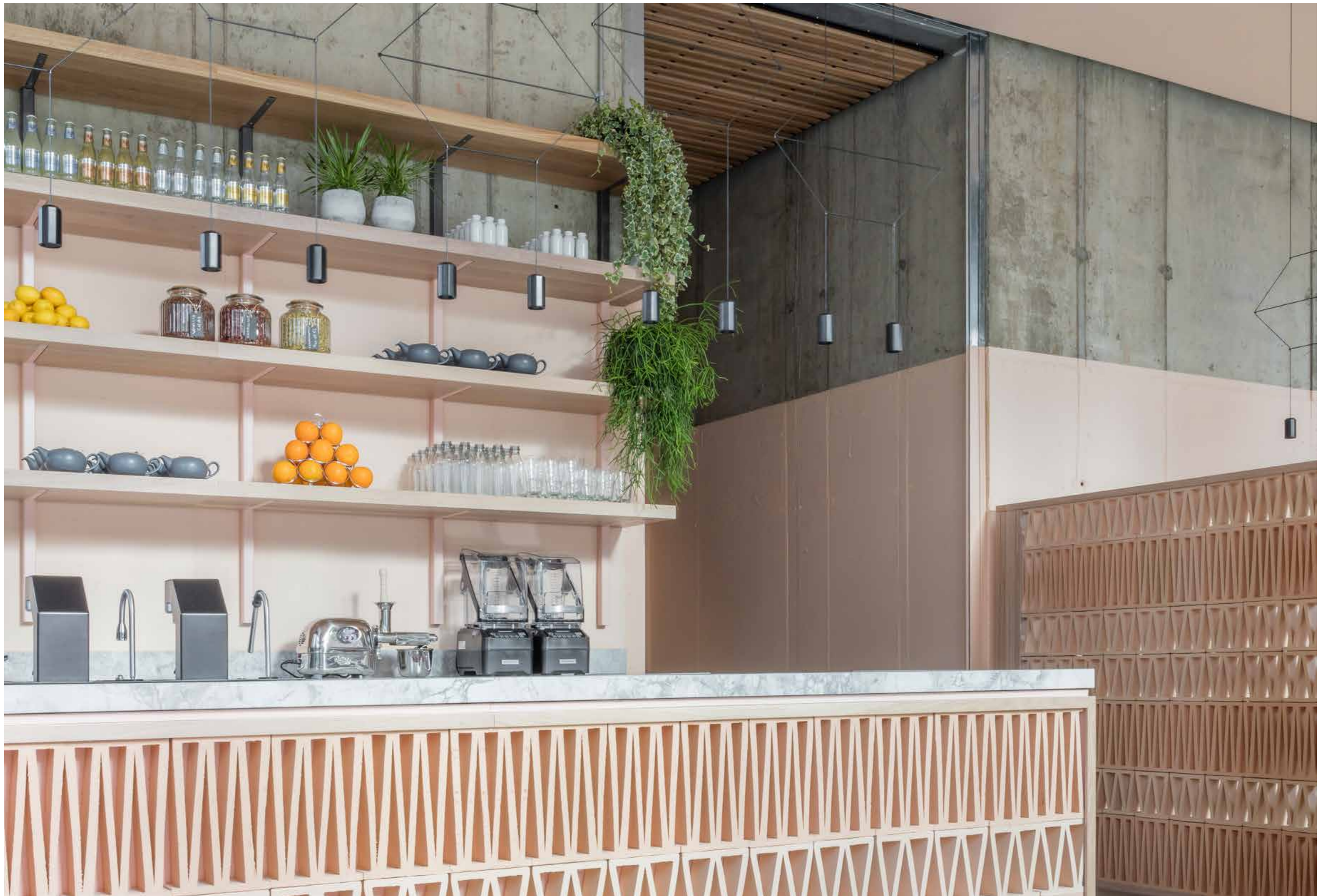
Big windows (lots of natural light - even for London)

Washer / Dryer and iron / ironing board

Loads of storage space

Interconnecting Rooms (for those who like to share the space but not the bed)





## EAST LONDON

At the heart of Zone 1, Aldgate has excellent transport links and is on the doorstep of some of the East London's most vibrant and exciting neighbourhoods. Step out of Leman Locke and the city of London is at your doorstep, with the hustle and bustle of Brick Lane, Spitalfield Markets and a wide range of markets, restaurants, bars and indie shops a stone's throw away; making it an ideal place to meet, live and call home.

Our residence is served well by public transport and is located just 2 minutes from Aldgate East underground station with the Hammersmith & City, District and Circle lines, and Aldgate underground station is also within another few minutes' walk, serving the Circle and Metropolitan lines, giving you easy access to all of London.



# Eden Locke



## ROOMS & SUITES

Eden Locke offers a calm refuge in the heart of Edinburgh's New Town. Every apartment has been meticulously designed to include everything you want - regardless of your length of stay. Although our suites are a tad smaller than your typical serviced apartment, they have been designed to feel a lot larger. We agree that space for the sake of space alone is worthless. For this reason, we have assembled your space to include the necessities:

Super Fast WiFi

Smart TV

The Locke Dream Bed

Fully equipped kitchen including utensils & dishes

Loads of storage space

Big Windows





# Eden Locke

**The Guardian**

Top 10 design hotels in the world

**Traveler**

“Inside the doors of Eden Locke’s austere Georgian exterior is a hip, pastel space that wont rest until you in Instagram it”

**ASIATATLER**

“Situating in neighbourhoods brimming with activity and independent boutiques these locations offer beautiful interiors as well as plenty of unique experiences”

**The Telegraph**

Editor’s pick of affordable hotels in Europe

**Wallpaper\***

Top 38 best urban hotels of 2018

**The Telegraph**

“So hip it hurts...fun, design savvy suites you can comfortably cook in”

**The Guardian**

Only hotel to make the top 10 things to do in Edinburgh

**We Heart**

“Here at Eden Locke, the forward-thinking aparthotel brand takes strides into a fascinating sector for the travel industry – if Locke Hotels continue to look this good, theirs is a story we look forward to watching unfold”





# Whitworth Locke Manchester

74 Princess Street, Manchester, M1 6JD

Opened November 2018

160-unit Locke

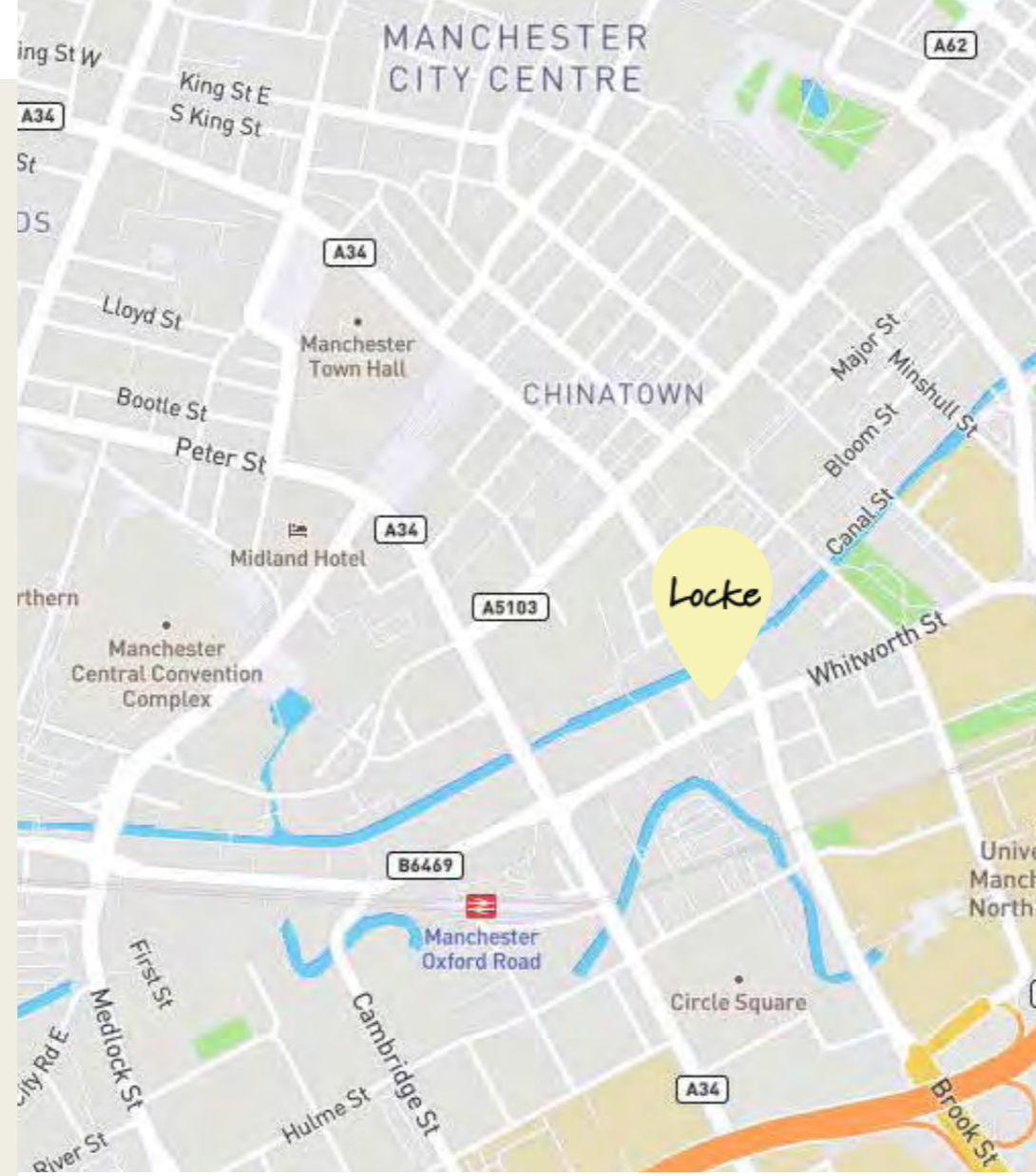
Conservatory Cocktail Bar / Foundation Coffee Shop & Co-working / Cotton Factory / Multi-Functional Event Space / Locker Room

Accolades:

“This achingly cool aparthotel has all you need for a stay in the city and more” - The Telegraph

Booking.com - 9.5

TripAdvisor - #11 of 113 Specialty Lodging in Manchester



# Whitworth Locke

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## The Telegraph

“This achingly cool aparthotel has all you need for a stay in the city and more”

---

## Manchester Evening News

“This boutique hotel might just be the most beautiful building in Manchester”

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## Wonderland.

“Whitworth Locke balances classic and contemporary design in a beautifully understated way”



“A fascinating and uniquely modern take on the designer aspirational second home. Whitworth Locke is the perfect city-centre refuge for guests and locals alike”

---

## The Telegraph

No. 1 of the hottest European hotels of 2019



“Locke – the brand of design-led aparthotels that immerses guests in its surrounding neighbourhood culture, connecting travellers with like-minded locals in staggering settings”







# The Moorgate London

67-71 Moorgate & 34 London Wall, London

Opened December 2018

27 Luxury Design-Led Apartments

Accolades:

"This is a wonderfully, almost unbelievably central location" -  
Business Traveller  
Booking.com - 9.5



# Locke at Broken Wharf, London

2 Broken Wharf, London, EC4V 3DT

Opened March 2020

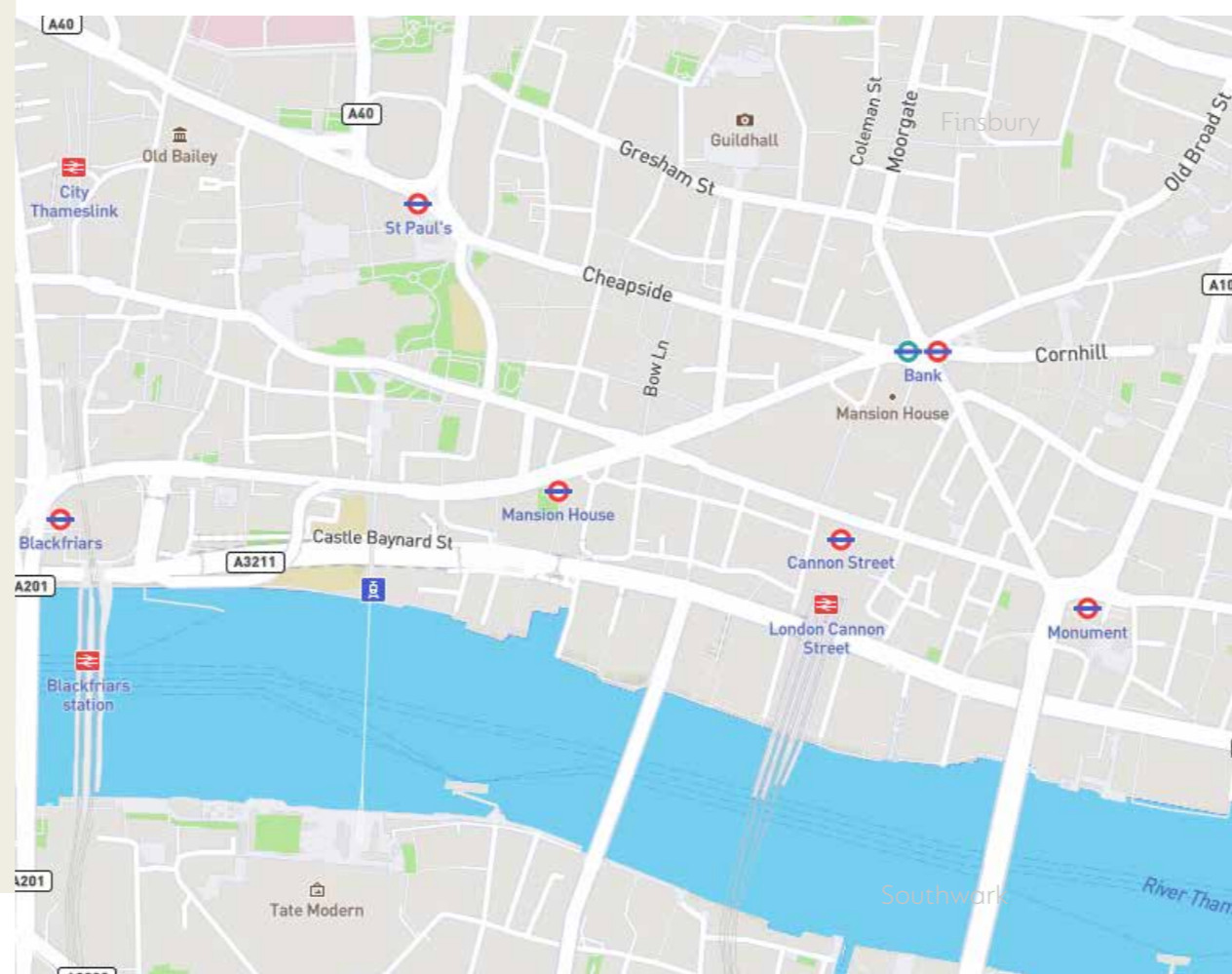
113-unit Locke  
113 x Studios

Third Wave Coffee Shop & Deli  
Chef-led Dining  
Destination Cocktail Bar  
Co-working & Flexible Meeting Space  
The Locker Room - gym / crossfit / yoga

Accolades:

“The Locke brand is yet more proof that the classic model of the hotel is on its last legs.

In its place is an intriguing, ever-evolving hybrid that feels as if you're staying at the home of your stylish, well-connected BFF” - Wallpaper



# Bermonds Locke, London

153-157 Tower Bridge Road, London, SE1 3LW

143-unit Locke  
92 x Studios  
51 x One Beds

Chef-led Dining  
Destination Cocktail Bar  
Co-working & Flexible Meeting Space  
The Locker Room - gym / crossfit / yoga

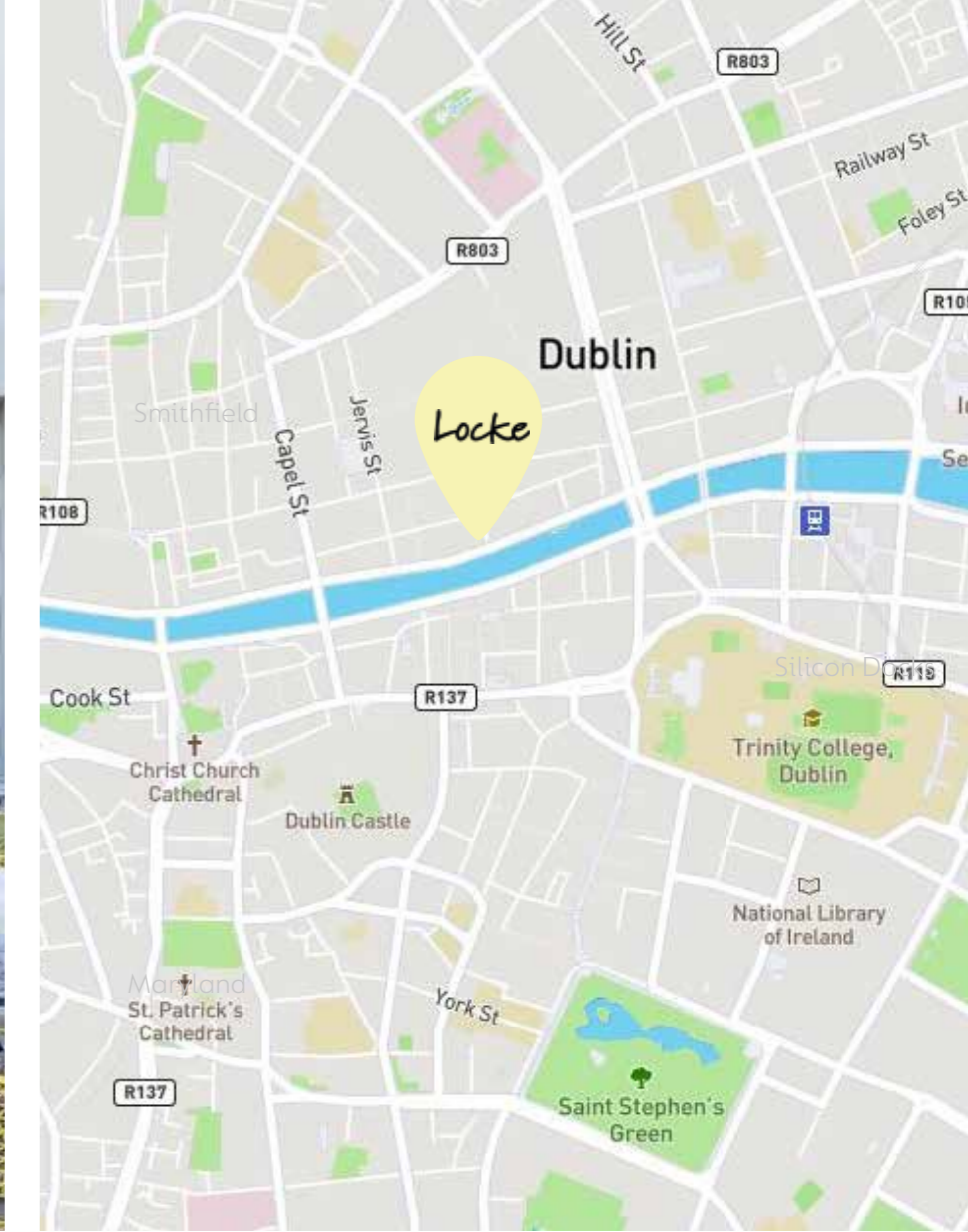


# Zanzibar Locke, Dublin

34 Ormond Quay, Dublin

160-unit Locke  
158 x Studios  
2 x One Beds

Chef-led Dining  
Destination Cocktail Bar  
Co-working & Flexible Meeting Space  
Locke Gym (Yoga)



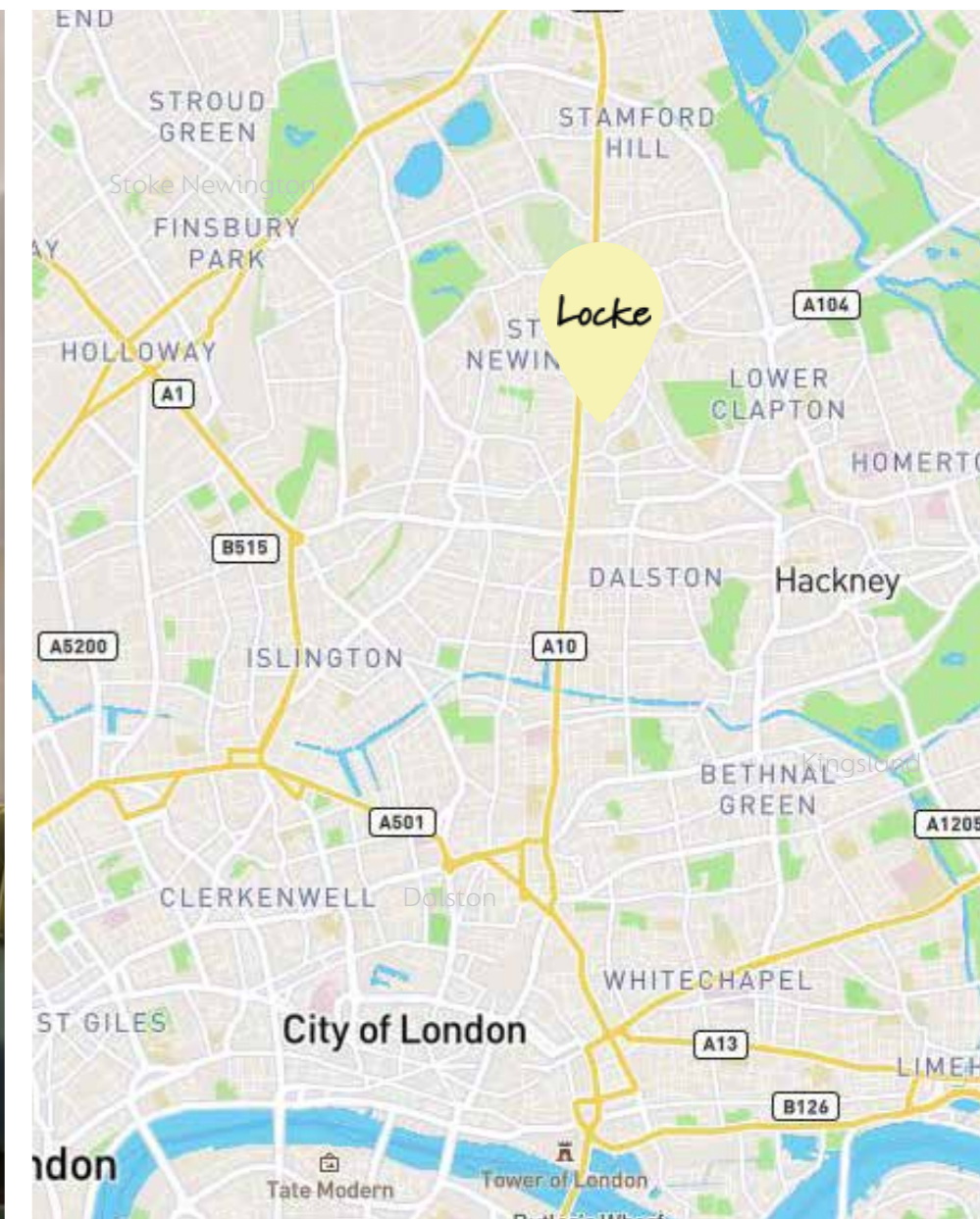


# Kingsland Locke, London

130 Kingsland High Street, London

124-key Locke Aparthotel

Chef-led Dining  
Destination Cocktail Bar  
Co-working & Flexible Meeting Space  
Locke Gym (yoga)



# Turing Locke & Hyatt Centric, Cambridge

Madingley Rise, Cambridge

330-unit Locke & Hyatt Centric

60 x Studios

105 x One Beds

15 x Two Beds

150 x Hyatt Centric Studios

Third Wave Coffee Shop & Roastery

Chef-led Dining

Destination Cocktail Bar

Co-working & Flexible Meeting Space

Street Food Market



**Edyn Ltd**  
**Dalston Locke**  
**Dispersal Policy**

**This document provides an overview of how dispersal will be handled at Dalston Locke. This document will be updated as necessary and finalised prior to the hotel opening.**

- Dalston Locke (DL) staff and partner colleagues will be trained in this policy.
- DL staff and partner colleagues will encourage customers to leave the premises in a quiet and orderly fashion. Notices will be displayed to reinforce this message.
- Taxis will be discouraged from waiting and only licensed and pre-ordered taxis will be permitted.
- Guests will not be permitted, as part of the house rules, to take deliveries to the premises.
- The property is designed for long-term stays, in excess of those experienced by an average hotel. Guests will be encouraged to treat the premises and other premises users and surrounds with the respect they would treat their own area.
- Regular staff briefings will be held to reinforce messaging around dispersal.
- DL staff and partner colleagues will be trained so as to be knowledgeable regarding the local area and local transport links.
- Customers will be prevented from removing drinks and glasses from the premises upon exit.

- Customers will be directed to the nearest mode of transportation for their onward journeys.
- Customers will be encouraged not to congregate outside the premises whilst waiting for transport. Where necessary customers will be asked to remain inside the building until their ride has arrived.
- The premises will use a variety of measures to ensure the steady dispersal of customers. The premises will not operate a hard stop at the end of the evening.
- Music volume will be reduced gradually towards the end of the evening and music will never be played at a level that would be capable of disturbing guests.
- The sale of alcohol may cease before the end of the evening with a suitable drinking up time employed to allow customers to finish their drinks and use the facilities before leaving.

**Our vision is to seamlessly integrate ourselves as part of the local community and to ensure that our guests come back to us time and again.**

**Edyn Ltd**  
**Dalston Locke**  
**Security Overview**

**This document provides an overview of the security provisions at Dalston Locke. This document will be updated as necessary and finalised prior to the hotel opening.**

- Dalston Locke (DL) will have a 24hour a day, 7 day per week security presence.
- This will be managed by in-house hosts.
- Various policies e.g. smoking as well as other information e.g. local transport links are explained to guests on check-in.
- Guest and staff access around the hotel is controlled by keycard.
- DL will hold daily operational meetings and security walkabouts. The timing of the operational meeting will be varied so that some take place during the day and others at night to take stock of the changes in the area across the trading day.
- DL will work closely with the Responsible Authorities and will play an active part in local safety and intelligence sharing operations.
- Anti-terror training is provided to staff in accordance with an emergency plan for critical incidents.
- After a certain hour (tbc) the main doors to the hotel will be closed and accessible only via guest keycard. The guest lobby will be manned 24/7.

- Installation of the latest CCTV equipment covering all areas, internal and external, of the hotel.
- Additional SIA licensed door supervisors will be engaged on a risk assessed basis taking into account the premises' need and any other community events.
- Any external events taking place at the hotel will have externally contracted security assigned to the event. Events will be risk assessed prior to confirmation of acceptance of the event.
- DL will have a documented training system in place for all staff at the hotel. Training records will be kept and can be made available for inspection.
- DL will employ a clear incident reporting procedure.

**Our vision is to be a platform for both the local community and those travelling in to immerse themselves with the indigenous surrounds forming positive and long-term relationships.**

## Edyn Ltd

### Dalston Locke

#### Waste Management Policy

This document provides an overview of the waste provisions at Dalston Locke. This document will be updated as necessary and finalised prior to the hotel opening.

- The ambition is to deliver a sustainable servicing regime that ensures no disruption to the local highways.
- Servicing areas to be continuously monitored and effectively managed
- Deliveries to be spread to avoid peak times, reduce localized traffic and lessen environmental impact.
- There are 2 key servicing areas:

##### **Rear servicing area**

This will be used for refuse vehicles, recycling and general waste collections as well as larger deliveries. These will be undertaken by private contractors.

##### **Front of House Entrance**

This will be used for ad-hoc deliveries including fresh produce etc.

- Servicing will be undertaken between 09:00 and 19:00 daily.
- Dalston Locke will work with suppliers to specify vehicle size and type, electric where possible, and to reduce idling.

- A good lift connects the delivery area with the storage areas within the hotel
- So far as possible, stock will be purchased via a limited selection of suppliers to reduce the frequency of deliveries.
- DL staff will patrol the exterior of the hotel and undertake litter clearance as necessary.
- The chosen waste collection supplier will be a company who can provide full recycling facilities to ensure that waste is disposed of in the most environmentally friendly way.
- DL will ensure the provision of cigarette receptacles outside the premises for customers who smoke. Staff will smoke in a separate designated area to the rear of the premises.
- DL will discuss its waste management operation with other local operators to ensure the avoidance of cross-over and bottlenecks.



H Planning Issue 24.03.17 AA F  
I Revised to Planning Officer's comment 20.11.17 AA F  
P Revised to planning/height comment 20.11.17 AA F  
Q Planning Issue 20.12.17 AA F



- ▲ Guest designated smoking area
- ▲ Staff designated smoking area

**DALSTON LOCKE**  
**130 KINGSLAND HIGH STREET**  
**LONDON E8 2LQ**

**CASE UPDATE**

**HOURS**

As applied for save that Licensable Activities shall not be provided to non-residents after 23:00 Monday - Thursday, 00:00 Friday/Saturday and 22:30 on Sunday (with non-residents off the premises 30 minutes thereafter (please see amended condition 4 below)

**NON-STANDARD TIMINGS**

To non-residents until 02:00 on the morning of New Year's Day (with non-residents off the premises 30 minutes thereafter)

**CONDITIONS**

As suggested in application save that

Condition 4 to be amended to read:

*There shall be no admittance or re-admittance to the premises to members of the public between the hours of 23:30 and 07:00 the day following Monday to Thursday, between the hours of 00:30 and 07:00 the day following Friday and Saturday, and between the hours of 23:00 and 07:00 the day following on Sunday. Hotel residents and their guests may be admitted to the premises at any time.*

Condition 19 to be deleted:

~~*All outside tables and chairs shall be rendered unusable by 23:00 each day.*~~

The following additional conditions to be added:

*The Licensee shall ensure that all staff are fully trained and made aware of the legal requirement of businesses to comply with their responsibility as regards the disposal of waste produced from the business premises. The procedure for handling and preparing for disposal of the waste shall be in writing and displayed*

*in a prominent place where it can be referred to at all times by staff.*

*The Licensee shall ensure that any contract for general and recyclable waste disposal shall be appropriate in size to the amount of waste produced by the business. The Licensee shall maintain an adequate supply of waste receptacles provided by his registered waste carrier (refuse sacks or commercial waste bins) in order to ensure all refuse emanating from the business is always presented for collection by his waste carrier and shall not use any plain black or unidentifiable refuse sacks or any other unidentifiable or unmarked waste receptacles.*

*The Licensee's premises are situated in an area within which refuse may only be left on the public highway at certain times (time bands). If the Licensee's waste carrier cannot or does not comply by collecting the refuse within an hour after the close of any time band imposed by the waste authority, the Licensee must remove the refuse from the public highway and/or keep it within the premises until such time as his/her waste carrier arrives to collect the refuse.*

*The Licensee shall instruct members of staff to make regular checks of the area immediately outside the premises and remove any litter, bottles and glasses emanating from the premises. A final check should be made at close of business.*

*The Licensee shall provide a safe receptacle for cigarette ends to be placed outside for the use of customers, such receptacle being carefully placed so as not to cause an obstruction or trip.*