

**IN THE MATTER OF THE LICENSING ACT 2003**  
**REVIEW APPLICATION IN RELATION TO LION & LAMB 46 FANSHAW**  
**STREET LONDON**

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**RESPONSE TO REVIEW APPLICATION ON BEHALF OF Mr ANDRE KING**  
**FOR THE PREMISES LICENCE HOLDER**

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Ms Kathryn Havelock has made a review application dated 7 August 2020, and served on the Licensing Authority on 12 August 2020, against the Lion & Lamb licensed premises, at 46 Fanshaw Street; premises operated by Mr Andre King of Plug Inn Limited.

The review application has been brought during a period when the premises have not been trading, due to the coronavirus pandemic lock-down. The premises did not open when they were first entitled to, from 4 July 2020, and have remained closed for extensive refurbishment and sound attenuation works to be done.

This review application is strongly refuted as unjustified and, in large part, vexatious.

Ms Havelock is the [REDACTED], both of [REDACTED] Burt House, a block of flats on Fanshaw Street, London N1 [REDACTED]. [REDACTED] has for a long time mounted a campaign of harassment against Mr King and the Lion & Lamb for personal reasons. [REDACTED] was refused a job when he applied to Mr King and there is evidence to demonstrate that since that time, he has directed hostility and retributive actions towards the premises and Mr King, in an attempt to undermine the business.

Mr King has successfully converted the Lion & Lamb from the troubled premises that it was when he first took it on; when it attracted a “football hooligan” style of clientele, and the business was facing bankruptcy. The premises licence was transferred to Mr King’s company, and he embarked on an ambitious programme to revitalise and refurbish the premises, to attract a completely different, more affluent clientele with a different demographic and style. This immediately addressed the “trouble” elements of the previous operation, which no longer affected the new style premises.

It is notable that there is no allegation of any breach of the crime and disorder licensing objective in this review application.

When Mr King took on the premises, there was no soundproofing installed at all. It is likely that the residents encountered some noise breakout from the premises in the hands of the previous landlord, as his regulated entertainments, by all accounts, were not considerate of local neighbours. Mr King embarked upon a programme of installation of state of the art sound attenuation systems. This was in full awareness of the relative proximity of residential properties, and therefore, the need to make a socially acceptable regulated entertainment venue. Mr King and his team imported their experience from working with many other London venues over the past 20 years, and invested significant sums of personal money. It took in excess of a year, from signing for the venue in June 2015 to opening in November 2016 to complete the initial round of works.

A small number of neighbours, specifically three out of the hundreds in the area - had concerns about noise. Mr King quickly engaged with them, visiting their properties, and together concluded that there was no audible disturbance emanating from the premises.

When Mr King's team first occupied the venue, several individuals moved onsite to live in the rooms on the 1st floor of the premises. It quickly became apparent that the area was generally noisy, with noise generated by commuters and passers-by and pedestrians crossing the street (Fanshaw Street) throughout the week and to an even greater extent at the weekend. This is a vibrant area, and people are generally passing as they leave nearby pubs and restaurants, generating movement and noise at all hours of the day, including night time. There are also sometimes parties carried out in the flats of the neighbouring area. This noise has nothing to do with the Lion & Lamb, and they are not patrons of the venue. To a significant extent, this general neighbourhood noise has been pinned on the Lion & Lamb by Ms Havelock and [REDACTED], in their campaign against the premises.

Mr King has also paid particular attention to controlling patrons when they go outside the venue to smoke, to ensure that they do not generate noise in outdoor areas.

Some of the interventions that have been implemented to achieve this include a pergola with sound-proofing material and additional sound absorbing material installed around the smoking area. Mr King employs extra security on site at all times to make sure patrons keep the volume at a minimum while outside, and to manage their dispersal as they leave the venue.

Further works have been implemented since the premises were opened, as a rolling programme of improvements and upgrading. A combination of all works implemented has created a system that is so effective, combined with the physical distancing between the premises and neighbouring properties that sound inside the premises cannot be heard outside the building. This system has been assessed and tested by the Council's EHO, and has been approved as effective.

Mr King's ambition has been realised, to revive an old and delapidated pub, that had seen little attention since its rebuild in the 1940s, into a cultural and music arts venue, and create an asset for the community and neighbourhood. The value of a music venue supporting up and coming artists is well recognised by Amy Lane, the Night Czar, and the Music Venue Trust, and the Night Time Industries' Association. The premises have received significant support in this regard.

The premises licence clearly permits a full range of licensable activities, including: Films, Indoor Sporting Events, Live Music, Recorded Music, other entertainment similar to live or recorded music or dance performances, late night refreshment and supply of alcohol. It is not accepted that any activities at the premises transgress the terms of the premises licence, and the assertion by Ms Havelock in her application that 'the venue has effectively transitioned itself from local public house to a de facto nightclub by stealth' is totally unfounded.

The premises is operated entirely based upon the premises licence and its conditions. The premises conduct a number of activities from gong baths, meditation, sound healings, a record store and record fairs, art exhibitions, showcases, album launches, music industry panel talks, and more, where the team support new and upcoming artists from various backgrounds and industries; bringing them together with world-class artists and agencies. The Lion & Lamb has built a world-wide following of like minded artists and patrons, and is renowned for what it has achieved in the industry in a short space of time. The Lion & Lamb is also a gastropub with high quality Italian food and cocktails.

To maintain the licensing objectives, Mr King and his team operate a very tight regime, whereby:

- They check the decibel level constantly throughout nightly operation, both manually with a decibel counter, and a decibel level display in the DJ booth, clearly visible to both the DJ and to staff and management.
- They have employed a professional security company of military veterans who work closely with the Metropolitan Police. To date, they have had no record of any incident inside or outside the venue, and the Police have not submitted a relevant representation in relation to this Review, confirming that there is no crime & disorder issue here.
- They have created an effective policy of patron dispersal in order to control noise once patrons are outside the venue. This has never been criticised by the responsible authorities.
- Although pubs and restaurants were allowed to reopen on 4th July 2020, the Lion & Lamb remained closed for a further full month, in order to carry out refurbishment works to the venue and to further soundproof the flat roof where there had been problems of water leaking. As the previous roof was removed, the opportunity was taken to put in place an extra layer to further soundproof the roof.

These works have been carried out while the premises have been closed due to Covid-19 and have just been completed. These works can be evidenced by the licensee's soundproofing experts, and have been checked and approved by the Council's EHO. Mr. Olalekan Olaosebikan of Hackney Council has visited the premises since the complaint was raised in order to fully assess the efficacy of the current soundproofing, and has found that noise cannot be heard to any observable level outside the venue in order to cause a nuisance to our neighbours. He has agreed to withdraw his representation on this matter following this site visit.

During the lockdown, in line with many other premises, the Lion & Lamb team has had to rethink, reorganise and restructure the business model and have adapted to the new measures. They have made cuts and are now at half the previous capacity since reopening on 6th August 2020. The current situation with the control of the COVID-19 pandemic appears to be getting worse and not better, putting enormous strain on this business, as well as many others. This is a disastrous time for the premises to be facing an unfounded review application.

The Council's approach should be guided by the letters that have emanated from the Home Office, and from other regulatory bodies, such as the Institute of Licensing,



advising a pragmatic and considered approach to licensed businesses during this difficult time.

**Particular observations on the Review Application:**

Page 2 Line 2 ( bullet point) – There is only one licensing objective cited. It will not be possible to expand into further licensing objectives at the hearing. ( See Secretary of State’s S.182 Guidance at paragraph 9.37 and 11.9).

Lines 4 – 6:

Miss Clover, acting on behalf of Mr King works regularly with Amy Lame ( Night Tzar), Paul Broadhurst and the GLA team. She is on the GLA Task and Finish Group and the London Transition Board Business Reopening Strategy Group. They would not give advice to Applicants for review in relation to individual cases, and these claims should not be accepted nor given any weight. If Ms Havelock wishes to be legally represented, that is her right.

The current licence is fully fit for purpose for the licensable activities which are conducted at the premises.

Third full paragraph. The licence was transferred, not “inherited”. The premises are not a nightclub. This would be a change of planning use class. The premises comprise a public house and have not changed use.

Fourth paragraph. There have been no relevant complaints disclosed from residents other than the [REDACTED] of this Applicant, [REDACTED]. There has been no breach of condition or term of the premises licence.

Fifth paragraph. A recording studio does not fall under the remit of the Licensing Act 2003, and all references to it are irrelevant to a review procedure. The Licensing Authority has no jurisdiction over a recording studio under the auspices of a licence review. It is not appropriate for the Licensing Authority to take any steps based upon hypothesis and speculation as to what might happen in the future in circumstances where the business has been operating without difficulty. Licensing is a remedial regime, intended to direct steps to cure a specific breach of a licensing objective that has arisen. That is not the case with this review application. No licensing steps are possible based upon the Applicant’s suggestion of “unwelcome possibilities”. The facility of review in the Licensing Act 2003 is designed to address problems when they arise, based on specific evidence of what the problem is and what it would take to remedy it.

Sixth paragraph. The “Agent of Change” principle is from paragraph 182 of the National Planning Policy Framework ( NPPF), and has no relevance in licensing proceedings. Even under the terms of the NPPF, “agent of change” refers to new development and these premises would not fall within the definition.

Seventh paragraph

- (1) – All allegations about inappropriate music break-out are refuted.
- (2) – Agent of Change – as above.
- (3) – “Future proofing” is not an appropriate licensing step. Licensing, as above, is remedial, and as per paragraph 9.43 of the Secretary of State’s s. 182 Guidance, determinations should be “evidence based, justified as being appropriate for the promotion of the licensing objectives and proportionate to what is intended to be achieved”. In this context, it is inappropriate to attempt to impose licensing steps for things that have not happened yet.

Page 3 paragraph 3, bullet points 1 – 5.

The Applicant generalises as to impacts that noise *can* have, but provides no substantive evidence as to what impacts she alleges that noise is having, or upon whom, in this particular case. This is a flaw with the review application that must be remedied before it could be heard. The Licensing Committee could not take any steps in relation to the licence without seeing evidence of what impact the licensable activities are said to be having. In allegations about noise, the Committee would expect to see evidence of occasions, places and times when noise has caused an issue of a specific type, described in the evidence. They would probably expect to see acoustic evidence produced by the applicant.

The Applicant highlights that the application was made during the lockdown period / period of non-trading, which confirms that no breach of licensing objective could possibly have been identified at the time of the application. The Applicant states that a “new sense of urgency” has been created during the lockdown period, when the precise opposite must be true.

The Applicant notes that the premises have been subjected to building works and that these have been tested for acoustic attenuation. The Applicant suggests that the works done have made the sound insulation of the premises worse, which is preposterous.

The Council's own Environmental Health Officer ( EHO) has been invited to scrutinise these works, and has pronounced himself satisfied with the works, to the point where the EH representation in relation to this review has been withdrawn. This is a key point, as there has historically been investigation into complaints made about noise, and if the EHO were still in any way in doubt about the propensity of the premises to give rise to a noise nuisance, this would have to be actioned, as a statutory duty under the Environmental Health Act 1990, as well as actioned through active participation in this review.

The absence of representation from Environmental Health is very compelling in this case. The Secretary of State's s.182 Guidance makes it very plain that the expert Responsible Authority in relation to any of the licensing objectives should take the lead in make relevant representations if there is any likelihood of a breach of those objectives ( see, for example, paragraph 9.12). The confirmation from Environmental Health that the works done to the premises are adequate to preclude a breach of the licensing objective is very important evidence that undermines the Applicant's review application significantly.

Page 4 of the Application: "Please provide as much information as possible to support the application":

The Applicant indicates that she has supplied a "detailed log of specific license (*sic*) infractions and nuisance noise occurrences to the Business Regulation Team Leader" for 2019. The only "detailed log" that appears to have been served comprises a list of dates, without any clear indication of what is said to have transpired on these dates. All the dates pre-date lockdown, and the most recent round of building and acoustic works. It is expressly refuted that these premises have given rise to noise nuisance in 2019. Had they done so, Environmental Health Officers would have been under a statutory duty to take action, upon the report of such complaints. On the contrary, the complaints were investigated at the time, and found not to be substantiated, such that no action by the Responsible Authority was necessary.

The "log" is not effective evidence upon which the Committee could take action, even in relation to the period to which it is said to pertain – namely, 2019. In any event, the Committee will not be so concerned with past events, but will wish to be concerned

with what the situation is now, and for the future, particularly with further sound attenuation works done, which have been checked and approved by the EHO.

Similarly, the allegations in relation to noise from patrons is refuted. The EHO will be well aware of where patrons gather in relation to the premises, and this is not regarded as a contributory factor to any noise nuisance. This review application was not brought at any time relating to patrons being outdoors, but has been brought several months into a period of non-trading. The review is based upon the evidence as it stands before the Committee now: retrospective steps in relation to what a situation might have been in the past, or speculation as to what it might be in the future is not appropriate.

The Secretary of State's s182 Guidance is clear at paragraphs 9.43 & 9.44 that:

“9.43 The authority's determination should be evidence-based, justified as being appropriate for the promotion of the licensing objectives, and proportionate to what it is intended to achieve”,

“9.44 Determination of whether an action or step is appropriate for the promotion of the licensing objectives requires an assessment of what action or step would be suitable to achieve that end. While this does not therefore require a licensing authority to decide that no lesser step will achieve the aim, the authority should aim to consider the potential burden that the condition would impose on the premises licence holder (such as the financial burden due to restrictions on licensable activities) as well as the potential benefit in terms of the promotion of the licensing objectives. However, it is imperative that the authority ensures that the factors which form the basis of its determination are limited to consideration of the promotion of the objectives and nothing outside those parameters. As with the consideration of licence variations, the licensing authority should consider wider issues such as other conditions already in place to mitigate potential negative impact on the promotion of the licensing objectives and the track record of the business. Further advice on determining what is appropriate when imposing conditions on a licence or certificate is provided in Chapter 10. The licensing authority is expected to come to its determination based on an assessment of the evidence on both the risks and benefits either for or against making the determination.”

The Applicant indicates at page 5 that:

“ This request for review includes but is not limited to review of entire venue license (*sic*).

As indicated above, the Application can only relate to the grounds of review and the licensing objectives indicated in the review application itself - paragraphs 9.37 and 11.9 Secretary of State’s s.182 Guidance. There is no prospect of a licensing review dealing with anything outside or beyond the premises licence.

At page 5, the Applicant indicates that she wishes for an independent acoustic report to be carried out. The premises licence holder has already commissioned independent acoustic experts to assess the premises and the works, and it is this which the Council’s EHO has assessed and approved. If the Applicant wishes to commission her own independent acoustic report, she is welcome to do so. This is not something that the Committee could order, as there is no power to do so.

The suggestions from the Applicant that amplified music should be played at background levels only, and that hours of the premises should be curtailed, and that noise limiting should be installed is clearly contrary to the factual evidence, as demonstrated empirically by the premises’ noise report as approved by the Council’s EHO. None of these suggestions are reasonable or proportionate, as they would need to be to constitute a licensing step.

The further steps suggested by the Applicant on the penultimate page of the review application are not reasonable, proportionate or borne out by the evidence. The conditions on the premises licence are already effective to control any potential impact on the licensing objectives, and the Applicant has adduced no substantive evidence that there has been an impact on the licensing objectives in the past; her allegations are entirely refuted and they all pre-date the lock-down.

The Applicant suggests limitations on the capacity of the premises. This is not something that is appropriate for the Committee as licensing decision-maker, being an issue predominantly of fire safety. Furthermore, the Applicant has not cited the licensing objectives that might be pertinent to capacity issues. The Secretary of State’s s.182 Guidance makes this plain at paragraph s2.12 and 2.12.

Supplementary material that supports the assertions made above is attached as Appendix 1 and 2 to this Response.

I declare that the contents of this Statement are true to the best of my knowledge and belief.

Andre King



.....Signed  
29th of September 2020.....Date

## Lion & Lamb Review

### Appendix 1

The claimant has tried to paint a negative picture of the venue by distorting the facts wherever possible. In this appendix we would like to paint a true picture of the kind of venue we really are. We have established ourselves as a multi-faceted music and arts venue. The claimant has made a claim that we have transitioned from Public House to a nightclub (which is untrue) using the evidence from the website Resident Advisor, an event listings platform. On this site, every venue, no matter what its purpose or setup is called a 'nightclub'. You can see this includes a number of pubs, bars, hotels and spaces that are simply venues. If you search on Google "The Barbican Centre" and "Resident Advisor" together it comes up as London Nightclub. This is clear evidence that this does not justify this claim. We have taken screenshots of some of them below:

[www.residentadvisor.net](http://www.residentadvisor.net) › club ▼

#### RA: Ace Hotel - London nightclub - Resident Advisor

An escape from the typical cocktail bar, Downstairs fosters an at-home sense of familiarity for locals and hotel guests with inspired programming including live ...

##### Ace Hotel

Jack Priest at The Ace Hotel.

March/. Fri, 27 Mar 2020. 1 ...

[More results from residentadvisor.net »](#)

[www.residentadvisor.net](http://www.residentadvisor.net) › club ▼

#### RA: The Barbican Centre - London nightclub - Resident Advisor

The Barbican is Europe's largest multi-arts and conference venue presenting a diverse range of art, music, theatre, dance, film and education events. Within the ...

[www.residentadvisor.net](http://www.residentadvisor.net) › club ▼

#### RA: The Horse & Groom - London nightclub - Resident Advisor

The Horse & Groom is a small, pub-style venue on Curtain Road in the heart of Shoreditch, east London. Opened in 2007, The Horse & Groom has since ...

[www.residentadvisor.net](http://www.residentadvisor.net) › club ▼

#### RA: Lion and Lamb - London nightclub - Resident Advisor

Lion and Lamb · Address / 46 Fanshaw Street, N1 6LG, London.

Sat, 26 Sep [Dinner with Butter Side Up ...](#)

5 Apr 2021 [\[RESCHEDULED\] Toi Toi ...](#)

The List goes on and on, with every pub, bar, art centre and even a bowling alley, restaurant & bar clearly listed as a London nightclub if you search on Google with the resident advisor link. This is what the claimant is basing the accusation on, however, this would mean that all venues in London should be considered nightclubs.



Below are pictures and links to videos that provide evidence to confirm that we don't operate as a nightclub. We are a public house, gastropub, and a hub that supports a variety of artists in the music and art industry. We host everything from panel talks, poetry recitals, jazz concerts, meditation sessions, and comedy nights. We are a music venue that showcases new upcoming artists in a variety of genres, filling the entire industry spectrum. We have become a powerhouse for upcoming artists to showcase their material and project them onto the world stage, and have become a platform that supports all local artists at a time when a lot of venues have been forced to close. Venues like ours should be protected as we are the first line for developing these new and upcoming artists.

Below are a variety of events that we have had in the pub since we opened:

### **Comedy Nights:**



### **Links to videos of our comedy nights:**

<https://www.facebook.com/pratik.barman/videos/10154993533886739>

<https://www.facebook.com/pratik.barman/videos/10155651250786739>

<https://www.facebook.com/pratik.barman/videos/10155628114476739>

<https://www.facebook.com/ricardo.sputnick/videos/1364047866963377>

### **Links to videos of Panel Talks for Artists, Community and the Wider Music Industry:**

<https://www.facebook.com/107669157311141/videos/2331637513609578>

<https://www.facebook.com/107669157311141/videos/2427642224156195>

<https://www.facebook.com/107669157311141/videos/554687955320915>

<https://www.facebook.com/HomeOfSoundLDN/videos/421487058526340>



<https://www.facebook.com/107669157311141/videos/888250665010161>  
<https://www.facebook.com/HomeOfSoundLDN/videos/878378102631020/>

**Links to videos of Workshops:**

<https://www.facebook.com/mauroferno/videos/10160564969020582>

**Links to videos of Poetry and Spoken Word showcases:**

<https://www.facebook.com/moe.conteh/videos/10155366605443408>  
<https://www.facebook.com/moe.conteh/videos/10155363244443408>  
<https://www.facebook.com/moe.conteh/videos/10155363260673408>

**Gong Bath, Meditation, Sound Healing:**

Zerya specialises in sound healing and intertwines the powerful sounds of a gong with chimes and a rain stick to stimulate meditative states; calming the mind and allowing the body to deeply relax.

<https://www.facebook.com/tuneinwithzerya/photos/gm.873113409787489/605205286716390>



**Links to videos of upcoming Singers and Bands:**

<https://www.facebook.com/mauroferno/videos/10161210273550582>  
<https://www.facebook.com/mauroferno/videos/10159770259005582>  
<https://www.facebook.com/mauroferno/videos/10158814806205582>  
<https://www.facebook.com/mauroferno/videos/10158815005640582>

## Jazz and Orchestra Recitals:



### Links to videos of jazz and orchestra recitals:

<https://www.facebook.com/ricardo.sputnick/videos/2470953292939490>

<https://www.facebook.com/ricardo.sputnick/videos/2089007771134046>

<https://www.facebook.com/ricardo.sputnick/videos/1900371039997721>

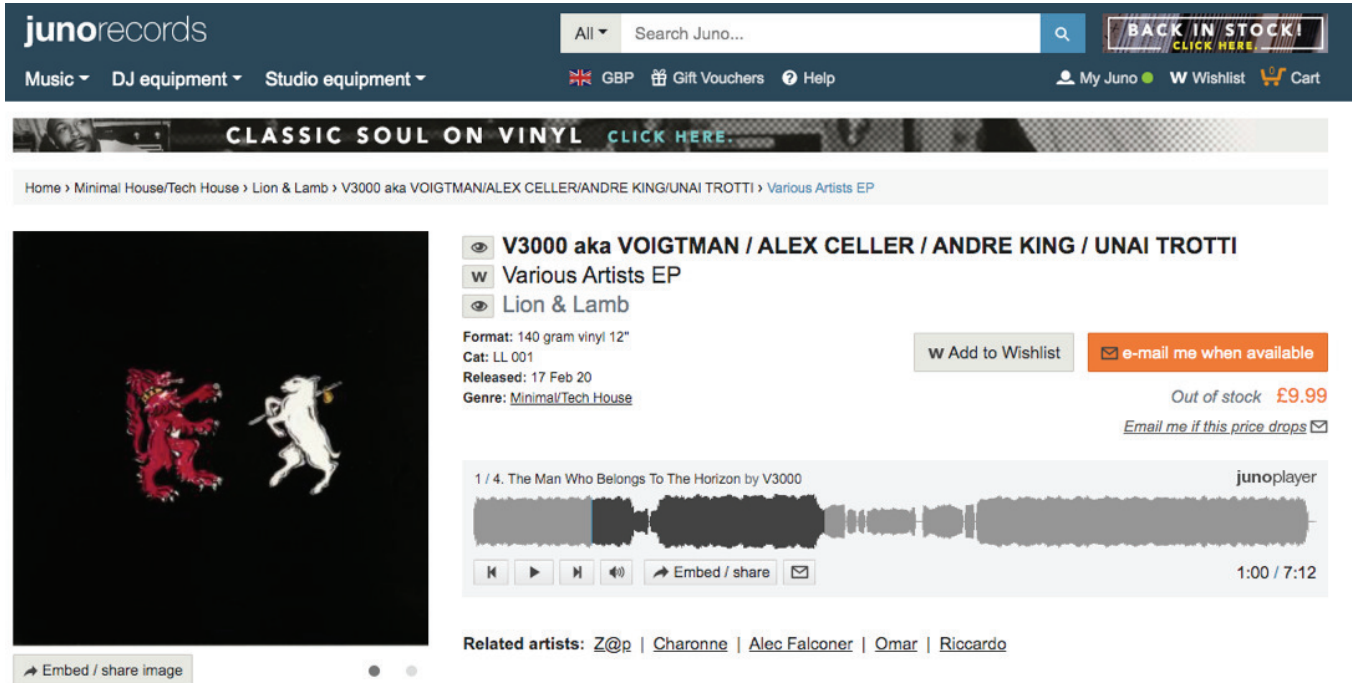
<https://www.facebook.com/mauroferno/videos/10161772523575582>

<https://www.facebook.com/ricardo.sputnick/videos/2597970070237811>

<https://www.facebook.com/mauroferno/videos/10161745132375582>

<https://www.facebook.com/ricardo.sputnick/videos/1870089569692535>

We also run a record label, and a record shop for promoting established and new, upcoming artists and their labels.



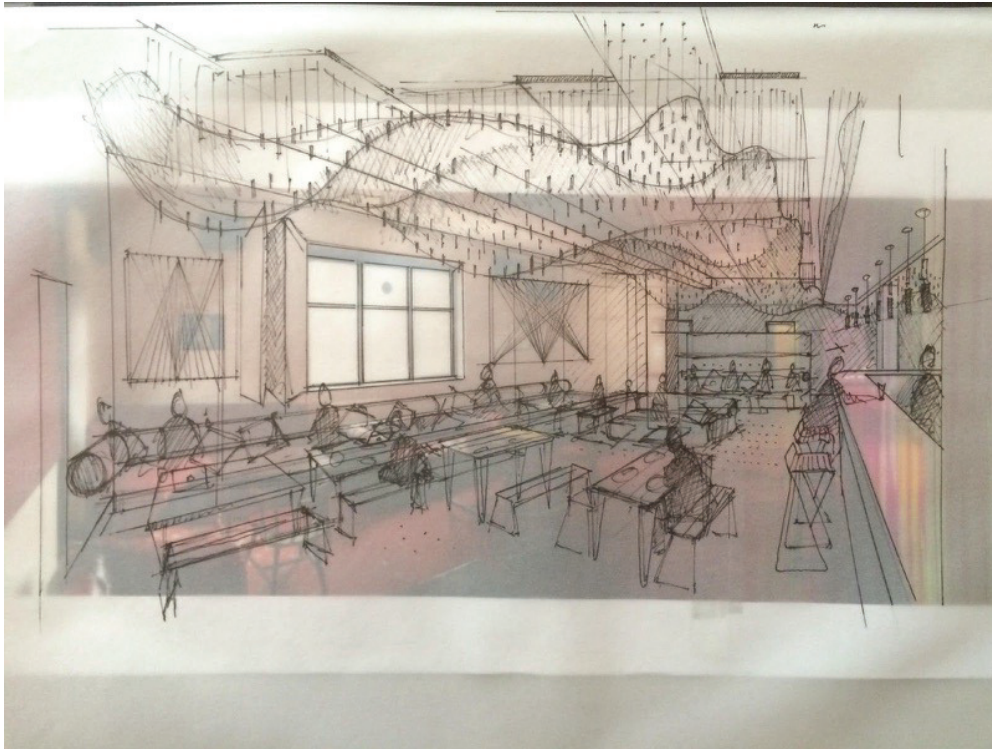
The screenshot shows the Juno Records website interface. At the top, there is a navigation bar with the Juno Records logo, a search bar, and utility links like 'GBP', 'Gift Vouchers', and 'Help'. A 'BACK IN STOCK! CLICK HERE' banner is visible on the right. Below the navigation bar is a promotional banner for 'CLASSIC SOUL ON VINYL'. The main content area features a breadcrumb trail: 'Home > Minimal House/Tech House > Lion & Lamb > V3000 aka VOIGTMAN/ALEX CELLER/ANDRE KING/UNAI TROTTI > Various Artists EP'. The product details include the title 'V3000 aka VOIGTMAN / ALEX CELLER / ANDRE KING / UNAI TROTTI', format 'Various Artists EP', and label 'Lion & Lamb'. Technical specifications such as 'Format: 140 gram vinyl 12"', 'Cat: LL 001', 'Released: 17 Feb 20', and 'Genre: Minimal/Tech House' are listed. A price tag shows 'Out of stock £9.99' with an 'Email me if this price drops' option. A music player is embedded, showing '1 / 4. The Man Who Belongs To The Horizon by V3000' with a progress bar and playback controls. Below the player, 'Related artists' are listed: Z@p, Charonne, Alec Falconer, Omar, and Riccardo. An 'Embed / share image' button is located at the bottom left of the product image area.





Below are pictures and architect's renders of our renovations to the building - inside and outside, our food menu, and a link to our website.

**Architect's render of our project, clearly showing a layout which was not designed as a nightclub:**



**Pictures from after the renovation works:**

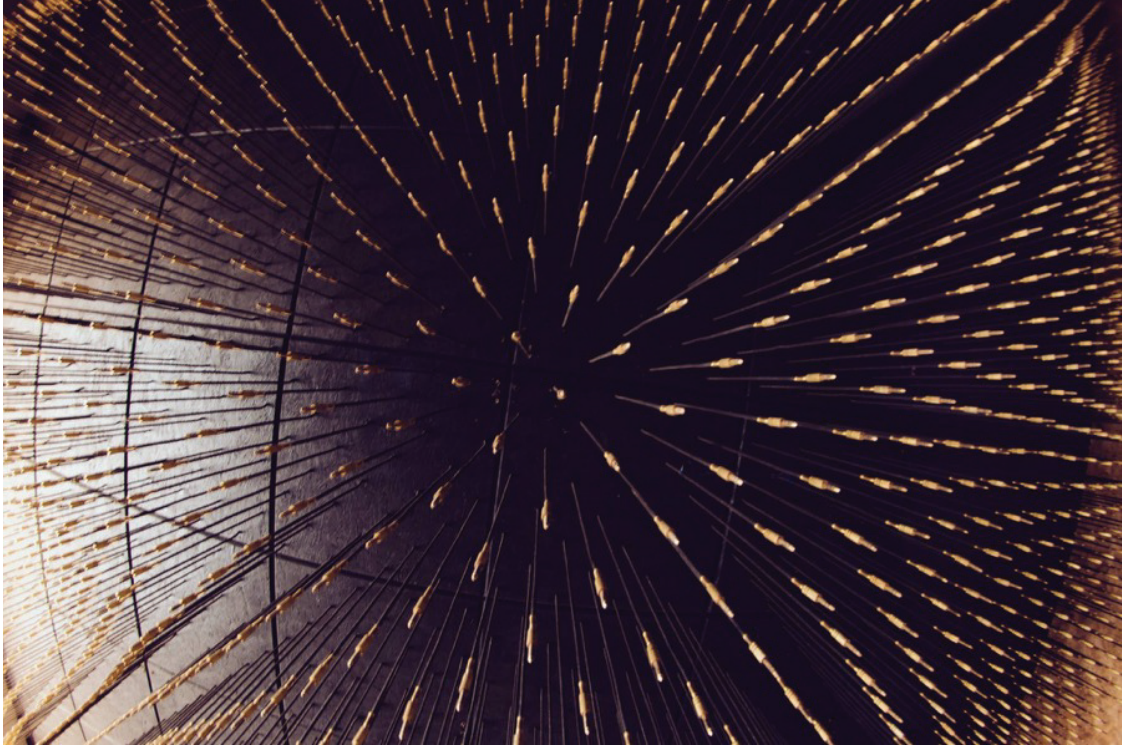








**Our Beautiful Ceiling Designed By Award Winning Architect Harry Clover:**





## Our Food Menu:



### ANTIPASTI

<b>Olives</b>	<b>£3.00</b>
<b>Olives &amp; Bread</b> (gluten)	<b>£5.00</b>
<b>Burrata</b> with grilled vegetables (dairy)	<b>£8.00</b>

### MAINS & SALADS

<b>Pan-Fried Sea Bass</b> fillets of sea bass with tender stem broccoli, grilled butternut squash & a fennel and rocket salad.	<b>£15.00</b>
<b>Chicken Skewers</b> chicken, chorizo, and button mushroom skewers with rocket salad. (gluten, dairy)	<b>£13.00</b>
<b>Grilled Butternut Squash &amp; Halloumi Salad</b> grilled butternut squash, baby gem lettuce, rocket, Halloumi with Chimichurri dressing * can be made vegan (dairy)	<b>£12.00</b>
<b>Chicken Caesar Salad</b> grilled chicken, baby gem lettuce, sourdough croutons and shaved Parmesan. (gluten, eggs, fish, dairy)	<b>£11.00</b>
<b>Pizza Fritta</b> with tomato sauce, oregano and Fior Di Latte mozzarella (v) (gluten, dairy, sulphites) OR with tomato sauce, oregano and grilled aubergine (v) (gluten, sulphites)	<b>£9.00</b>

### THE LION & LAMB DELUX SANDWICHES

<b>The Bloodthirsty</b> The Steak Sirloin grilled sirloin beef steak, sourdough bread, chimichurri mayo, caramelised onion and rocket served with skin-on fries (gluten, eggs, sulphites)	<b>£14.00</b>
<b>The Hallouminati</b> The Vegetarian Fried halloumi, Chimichurri Mayo, caramelised onion and rocket on sourdough, served with skin-on fries (gluten, eggs, sulphites)	<b>£13.00</b>
<b>Hi, I'm Vegan</b> The Vegan grilled mixed vegetables, vegan Chimichurri mayo, caramelised onion and rocket on sourdough, served with skin-on fries (gluten)	<b>£11.00</b>

### SIDES

<b>Deep Fried Halloumi</b> (dairy)	<b>£6.00</b>
<b>Skin-on Potato Fries</b>	<b>£4.00</b>
<b>Sweet Potato Fries</b>	<b>£5.00</b>
<b>Rocket &amp; Cherry Tomato Salad</b>	<b>£4.00</b>

### DOLCI

<b>Tiramisù</b> (eggs, gluten, dairy)	<b>£4.50</b>
<b>Italian Cannolo Siciliano</b> (dairy, gluten)	<b>£5.00</b>

Some of our dishes contain allergens. There is a small risk that traces of these may be found in a number of other products served here.  
Please speak to a member of staff for any queries.



Picture of our Food:



**In summary, we would like to clearly state once again that we are a multi-cultural music and arts venue that has become important to the cultural landscape of London. It is very important that the committee understands that any loss to our licensable activities or trading hours would quickly force us into bankruptcy in the future. We are currently feeling this loss of hours during the current restrictions due to Covid and are relying on grants and crowdfunding platforms in order to survive.**

**Please visit our website:  
<https://www.thelionandlamb.co.uk/>**

## Appendix 2 - Sound proofing of The Lion & Lamb

We have spent somewhere in the region of £100,000 to soundproof the venue from the original renovations 4 years ago to the last round of work that has just been completed over the last few months. One of the things we are famous for is how good our soundproofing is. Ask any of our patrons and they will all categorically say "you just can't hear anything outside" This work was done with a duty of care to our residents and at huge personal costs to the owners. We have furthermore conducted many series of tests which have included going to the flat of Kathryn Havelock and [REDACTED] at [REDACTED] Burt House in the past (after us repeatedly requesting access so we could see if their complaints were justified) and sound tests were carried out that concluded that there was no disturbance being caused by the venue. We have furthermore visited flats in Fairchild House (which is closer to the venue than Burt House) that also concluded the same thing. We have carried out many series of tests all concluding that there is no disturbance being caused by the venue to the neighbouring flats. After all the tests carried out we confidently categorically deny that we have created any disturbance to our neighbours and that there has been no breach of our licence as claimed. Furthermore the council's own EHO visited the venue recently and concluded the same thing.

Lastly there is a letter attached here from [REDACTED] a resident from [REDACTED] Fairchild House, who lives on the [REDACTED] [REDACTED] with his young children and their grandmother directly looking onto the premises (this is closer to the venue than Kathryn Havelock of [REDACTED] Burt House) and he categorically states that they have never been disturbed by the venue. It is clear that any noise complaints are in large part vexatious. It has also been brought to our attention that a petition carried out by [REDACTED] of Kathryn Havelock) is actually based on us building a new roof terrace that if in use, would affect the residents of Burt House and Fairchild House with noise from patrons. [REDACTED] has clearly manipulated the facts here to get people to sign a petition that looks like it supports this review but is in fact about the roof terrace, which has nothing to do with this review. (Please note the only resident to make a representation was concerning the roof terrace and nothing to do with licencing and the review in question). To clarify this is not a roof terrace but is in fact additional soundproofing that has just been built and is not going to be used as a roof terrace unless we apply for planning permission, which we are currently not looking to do.

I will now lay out for your information all the soundproofing that has been carried out by us to the venue in the last 4 years. We built a Lobby of 7m by 2.5m - the inside wall (15inches (40cm)) is made of a frame filled with 100mm rockwool Sound Insulation Slab, 2 soundproof plasterboards on each side, plus OSB boards on each end, with a 2 way door system separated by 4m apart. The entire venue has an independent stud frame all around, with over 15inches (40cm) of an assembly of 100mm mineral rockwool, SoundBoard, rubber, foam, plasterboard, silicon, OSB, all floating on rubber with an extra 4 inches separation from the original venue walls for dead air sound trap.

We have also created a triple window system of double glass and a (24mm Perspex sheet which blocks - Low frequencies 30db, Flat frequency spectrum 35db, High frequencies predominant 36db). The venue also has all soundproof doors and soundproofed fire exits.

This a picture of the soundproofing works during the original renovations



In addition to this, following a water leak on the flat roof which we believed had damaged some of the sound proofing, we took the opportunity to build a further soundproofed 2nd roof as an extra precaution. This was built again with a duty of care and at further personal costs to the venue at a difficult time during the end of lockdown when we were not trading.

Removal of the old roof when this review was raised:



This new roof (please refer to pictures below) has been build exclusively as an additional soundproofing measure from the top of the roof and consists of a 2 way joist system with a top and bottom soundstop 6mm acoustic rubber mat in-between to absorb and dampen sound. This joist frame system raises over 15 inches and has been packed on all sides with 100mm mineral rockwool. Then there is a 4 inch gap for dead air after which the top of the frame is sealed with soundboard rubber sheets with silicone, then soundproof acoustic plasterboard, then structural plywood and then a last layer of heavy duty acoustic felt for both sound and waterproofing.

Pictures of the new roof being built:







Completed roof, finished with acoustic felt:



█ Fairchild House  
Fanshaw Street  
London  
N1 █

To Whom It May Concern:

I am a resident of the above address and we look directly on to The Lion & Lamb from the second floor,

We are a family and have been living here for over 4 years

I would like to say that in the 4 years since the Lion & Lamb have been operating we have never been disturbed by them by loud music or noise from customers.

I hope this shows that Lion & Lamb have been nothing more than respectful to the residents around.

Yours truly,

█

██████████  
██████████ Academy Buildings  
Fanshaw Street  
London  
N1 ██████████

## To Whom It May Concern

I am a resident of the above address on Fanshaw Street and face directly towards the front entrance of The Lion & Lamb.

I have lived around the area almost for 3 years now and can state that the pub is the least noisy aspect of living here. I have never been annoyed by noisiness of the pub or its patrons. My balcony faces the same street as The Lion and Lamb, and the noise of passing cars and people is louder than any noise I've heard from the pub. Furthermore, there is constant noise from passers by and also from inconsiderate neighbours living across the road from me. I have been kept up by parties in the opposite blocks to mine, also on Fanshaw Street, but never by the Lion & Lamb.

This is an area where lots of young people live and you can always hear music most weekends coming from their flats. Also, there are lots of random people shouting in the street who are walking via Fanshaw Street to or from Shoreditch, but they have nothing to do with The Lion and Lamb.

Being a customer of Lion and Lamb, I have witnessed their staff always keeping their customers quiet outside the venue and can see that they respect the area wholeheartedly.

Yours Truly,

██████████

21 September 2020