

Licensing Sub-Committee (2)
 Rooms 18.01 to 18.03
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By email only to kscharlemagne@westminster.gov.uk

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Dear Councillors Mitchell, Wilkinson and Toki

18/15940/LISEVR

Vanity Bar & Nightclub, 4 Carlisle Street, London W1D 3BJ – Application to renew a Sexual Entertainment Venue licence

I represent the applicant company, Nags Head Ltd ("the Applicant"), which is applying to Westminster City Council to renew its Sexual Entertainment Venue ("SEV") licence at Vanity Bar & Nightclub, 4 Carlisle Street, London W1D 3BJ ("the Venue")

I thought it would be helpful to write to you, the Licensing Sub-Committee ("the Committee") scheduled to hear the application to:

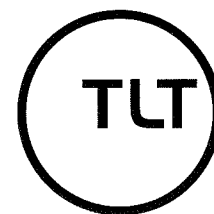
1. Explain who the Applicant is;
2. Explain how the Applicant manages its SEVs;
3. Address you in relation to you SEV policy; and
4. Offer some observations in response to the representations the application has attracted.

I will, of course, expand upon these points at the hearing before the Committee on 28 March 2019 but I sincerely hope that this letter gives you a flavour of the submissions the Applicant wishes to make to you.

The Applicant

The Applicant was formed in May 2007. There are two directors of the Applicant:

1. Mr Manpal Singh Clair; and



2. Mr Shamsheer Singh.

The company was formed to codify the interests the Singh family have in licensed premises and in particular, SEVs. The family and indeed, the Applicant, have a long history of successfully and responsibly operating SEVs dating back to 1980.

The Applicant's first venue was The Nags Head Gentleman's Venue ("the Nags Head") on Whitechapel Road in Tower Hamlets. The family and the Applicant have operated that venue since 1980. The Nags Head operates under the same legislation as the Venue, which was adopted in Tower Hamlets in 2015. Since then, the Applicant has applied for and has been granted renewal of its SEV licence for the Nags Head on four occasions between 2015 and 2018. The current SEV licence expires in May 2019 and there is no reason to believe that it will not be renewed for a fifth time.

The Applicant also operates the Venue and has done so since 2015. This is the first time that a renewal application for the Venue has been before the Committee since 2015. The SEV licence for the Venue has previously always been granted under delegated authority. It is fair to say that the Applicant is disappointed and sorry that this matter is before the Committee.

The Applicant is currently looking for suitable sites for further SEVs in London.

Aside from SEVs, the Applicant also operates a number of other licensed premises around London.

Mr Manpal Singh Clair will be attending the hearing on 28 March 2019 and will be happy to speak to his family pedigree in terms of owning and operating SEVs and licensed premises.

Management of SEV

The Applicant takes its duties in managing the Venue (and indeed its other SEV/premises) very seriously indeed.

The Applicant is mindful of the highly regulated world that it operates in, both in the context of its SEV licence and its premises licence.

With this in mind, the Applicant has built an entirely bespoke due diligence practice around its obligations under its SEV licence. The basis for this practice is a risk assessment of the Applicant's premises. This risk assessment is undertaken annually and seeks to identify the potential risks, both internal and external, of operating a SEV. The risk assessment particularly looks at the risks to the Applicant arising from the obligations placed upon it by virtue of its SEV licence and premises licence.

The risk assessment identifies a number of ways in which the Applicant can manage or mitigate risks to its business. For example, the Applicant is regularly visited, on an overt and covert basis, to assess compliance with the conditions of its SEV and premises licences. The visits are conducted by ex-police officers who are provided with the conditions of the SEV and premises licences. The visits are random and the Applicant is not aware of when the visits will take place. Where tweaks to operating procedures are identified, these are fed back to the Applicant centrally.

Another example of due diligence work identified by the risk assessment was the need to develop and maintain a "Licensing Manual" for staff at the Venue. I do not intend to submit a copy of the Licensing Manual with this letter. No discourtesy to the Committee is intended.

Indeed, when you see the size of the Licensing Manual I believe you will thank me for not submitting it!

The overall risk assessment is conducted by a suitably qualified licensing consultant in the person of Mr Andrew Bamber. Mr Bamber will be attending the hearing on 28 March 2019 and will be happy to speak to the Committee about the risk assessment he undertook for the Applicant and the relevant measures that have been put in place arising from it.

SEV Policy

Westminster City Council, quite properly, has a SEV policy (the SEV Policy) that governs how it approaches applications for the grant, renewal etc. of SEV licences. The SEV policy was brought into effect in 2012. The SEV Policy must be read in conjunction with Westminster City Council's Statement of Licensing Policy (the Licensing Policy) and both policies share almost identical aims, namely to promote:

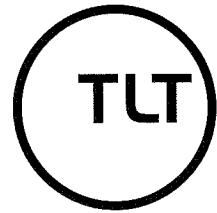
1. The prevention of crime and disorder;
2. The prevention of public nuisance;
3. Public safety;
4. The protection of children from harm; and
5. Improvement in the character and function of the city, or areas of it.

The SEV Policy sets out clearly the grounds upon which the Committee may grant or refuse an application for an SEV licence. These are based on the relevant legislation, the Local Government (Miscellaneous) Provisions Act of 1982.

The first ground, MG1 is a mandatory ground to refuse a SEV licence. It sets out a number of reasons why the Committee would be required to refuse an application. None of those reasons apply to the application before the Committee.

The second ground, SU1 is concerned with the suitability of the Applicant to hold a SEV licence. The considerations given are:

1. The nature, number and frequency of any offences committed by the Applicant or companies in which they were a Director. **There are none.**
2. The background and history of the Applicant in the operation or management of entertainment or licensed premises. **I hope that we have provided suitable details above, but should the Committee have any questions we will be most happy to answer them.**
3. The history of any association, whether formal or informal, with the management of entertainment or licensed premises. **There is negative association, formal or informal. The Applicant's management of entertainment and licensed premises is unblemished.**
4. The nature of any pending action in relation to an alleged criminal offence committed by the Applicant. **There is no such pending action.**



Policy SU2 concerns SEVs being carried on for the benefit of another person. That is not the case here. The Applicant enjoys the benefits of the SEV licence without recourse to any other person.

The next policy, Policy NO1 relates to Westminster City Council's views about how many SEVs should be located in relevant localities. Westminster decided that there should be 25 SEVs in the Westminster core CAZ north area (the area where the Venue is located) and 0 SEVs outside of that area.

Westminster City Council looked very closely at the makeup of the area when approving the core CAZ north area on a ward by ward basis. Westminster also consulted with various other persons and bodies when determining its policy. The Applicant is one of the (up to) 25 SEVs lucky enough to be granted a SEV licence in the core CAZ north. The Applicant cherishes its licence and is under no illusion about the requirements placed upon it. I hope that the Committee will feel that the Applicant takes its obligations very serious indeed and notes the procedures the Applicant has put in place to demonstrate that it promotes the Council's objectives.

Policy LO1 deal with the character of the relevant locality. It is acknowledged both within Westminster's Policy and by the Applicant that there is a fair degree of overlap between policies LO1 and NO1. We submit that Westminster City Council looked very closely at the area in which to grant SEV licences and this includes the area in which the Venue is situated. Westminster City Council determined that it was appropriate to grant SEV licences in that area and indeed, has granted one to the Applicant on no less than three previous occasions. We further submit that there has been no change to the character of the relevant locality that could or should persuade Westminster City Council to change its mind on this point.

The next policy, Policy LO2 deals with the uses of other premises in the vicinity of the Venue. Simply put, we say there has been no change to the uses of other premises in the vicinity of the Venue that could give rise to a concern under this heading.

The final policy, LO3, deals with the layout of the premises. I am happy to confirm that the layout of the Venue remains exactly as it was when the Committee was kind enough to grant an SEV licence to the Applicant in 2015.

I trust that the above explains our observations as to how the Committee should approach the SEV Policy but I would be most happy to answer any questions the Committee may have at the hearing.

Representations

The Applicant has been sent copies of all of the representations received. All of the representations (and of course, we do not know precisely who they are from because they are redacted) would seem to have been made by members of the public. It is telling, we submit, that there is not one single objection, not one single observation from Westminster City Council's Licensing Service, Police Licensing Team or Environmental Health Service; all of whom one could have expected to object if the Venue was problem premises or even on their respective radars. I ask the Committee to bear this fact in mind when noting the concerns of the other objectors.

Received: 7 Jan 2019 at 10:48

This seems to be an objection supporting an objection submitted by another person.

The person making the objection does not offer that he or she has actually witnessed any noise or disturbance from the Venue merely that he or she has been "aware of" or "copied in to" correspondence. It is, of course, a matter for the Committee to decide what weight, if any, it attaches to a particular objection but we would offer that any information that the Committee could glean from this particular objection is extremely limited indeed.

Received 7 Jan 2019 by Interested Party

The person making this objection notes that the Venue is located in a quiet area of Soho and that the only noise in the early hours of the morning emanates from the Venue. The Applicant refutes this for two reasons:

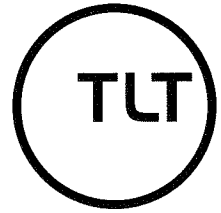
1. The Applicant has engaged the services of a suitably qualified acoustic consultant in the person of Mr Richard Vivian of Big Sky Acoustics Ltd. Mr Vivian has attended the Venue and has observed first-hand the sound system in situ. Mr Vivian has undertaken a review of that system and will be able to confirm to the Committee that noise from activity within the building is contained by the building envelope and that the sound system is controlled by a calibrated and tamperproof limiter. Mr Vivian will be attending the hearing on 28 March and will be happy to speak to the Committee about the noise prevention measures in place at the Venue.
2. Mr Bamber in the course of conducting the overt and covert visits at the Venue and at others in Soho often has call to pass by the Venue after midnight. Mr Bamber will also be able to confirm to the Committee that there is no noise escape from the Venue onto the streetscape, but he will also be able to give the Committee a flavour of the vibrancy of the area post-midnight.

The person making this objection also states that the Venue's management fails to monitor and dissuade pedicabs from gathering outside. This is simply not the case. Pedicabs are as much an issue for the Venue and the Applicant as they are for those raising objections. Pedicabs are identified as a potential risk within the Venue's risk assessment. I enclose a copy of the relevant page of the risk assessment for the Committee's information. Flowing out of the risk assessment the Venue has a number of policies including a Pedicab Policy and a Street Management Policy. These policies are strictly enforced and are monitored by the covert and overt visits the Venue is subjected to throughout the year. I enclose a copy of a report from Mr Bamber which details the visits to the Venue and the measures that are in place. It is that we will fairly develop before the Committee but I hope you will forgive me for saying that there is only so much the Venue and the Applicant can do about Pedicabs. The Venue has no enforcement powers whatsoever to require a Pedicab operator to move to another area.

Noise escape from the Venue is also raised. As noted above, the Applicant has engaged Mr Richard Vivian to deal specifically with this point. Mr Vivian has visited the Venue and the Committee will hear from him as to the measures he has taken to ensure that even if noise escape were a problem that steps have been taken to address it.

Finally, the person making this objection also raises cumulative impact. The Committee will be aware the cumulative impact relates to applications under the Licensing Act 2003 rather than the LGMPA 1982. I hope that the Applicant's response to policies NO1 and LO1 respectively deal adequately with this point.

Received: 5 Jan 2019 by Interested Party



The person making this objection seems to have adopted many of the same points and much of the wording of the previous objection.

The only comment the Applicant wishes to make in relation to this objection centres on whether this type of venue is more suited to the buzzy atmosphere of the southern parts of Dean Street, Old Compton Street and Brewer Street. It is fair to say that Westminster Council determined that the core CAZ north as a whole was suitable for SEVs up to a maximum number of 25. The question of locality was looked at very closely by the Council when taking that decision and we submit that nothing has changed in that regard.

Received: by [sic]

This objection raises questions as to the suitability of the building in relation to the use of the Venue as an SEV. The Committee considered this question when granting the Applicant a SEV licence. There have been no changes to the layout of the Venue that would offend policy LO3. It was and remains a Venue adapted for use as a SEV.

The objection goes on to query the noise limiter which is installed at the venue in relation to the condition that it appended to both the SEV licence and premises licence. There is a noise limiter installed at the venue. The noise limiter was set in conjunction with the Council's Environmental Health Consultation Team who has not raised any objection to this application. Furthermore, the Applicant has arranged an independent acoustic consultant to visit the premises and review the setup therein. Mr Vivian recommended some minor tweaks to the system and soundproofing, both of which have been implemented immediately. The Applicant takes all of the SEV Policy objectives seriously and does not wish for anyone to be disturbed. The Applicant even went to the length of offering and paying for noise assessments from within objectors' properties though none have been permitted. I sincerely hope this shows just how seriously the Applicant takes its responsibilities.

28 December 2018 at 11:42:40

This objection was only received by the Applicant on 12 March 2019 despite having been sent to the Council on 28 December 2018. In any event, the Applicant is happy to address it.

The objection contains a photo that the person making the objection says was taken at 04:33 hours on 7 December 2018. The photo is not date or time stamped confirming this but the Applicant is happy to take the person making the objection at his or her word.

The festive period is a particularly busy time for the Venue. As such, the Venue has given a series of Temporary Event Notices (TENs) every December since 2015. 2018 was no different. The Applicant submitted TENs as follows:

- 29 November 2018 – 1 December 2018;
- 4 December 2018 – 9 December 2018;
- 11 December 2018 – 16 December 2018; and
- 18 December 2018 – 23 December 2018.

We enclose for the Committee's information copies of four emails from one of the council's Senior Licensing Officers acknowledging receipt of the TENs. We also enclose an example copy of the TENs that were submitted (all were in a similar format). Finally, we enclose a copy

of my email to the Applicant enclosing the various TENs given together with some advice on operation during the notice period(s). It is, I'm afraid, just wrong to suggest that the Applicant has been operating outside of the confines of its permissions and we are pleased that we are able to rebut that specific allegation.

We have addressed the issue of Pedicabs earlier in this letter and we will not repeat ourselves, but it is worth adding that if the Pedicabs are the main source of annoyance for those making objections then they will find a willing partner in the Applicant and the Venue in terms of looking at practical solutions to resolve their concerns.

Councillor Glanz

Councillor Glanz's email (for reasons that will become apparent we refer to this as an email rather than an objection) was also received by the Applicant on 12 March 2019. We are told that it was received by the Council on 7 January 2019 and was therefore in time. It matters not whether the email was received in time or not in time and the Applicant does not wish to be clever by taking procedural points for the sake of doing so. What matters is what Councillor Glanz actually says:

*"... I do recall there were significant and detailed Conditions applied to the Licence. **If those Conditions are being ignored** then I would support residents and others affected in any review process or informal process to ensure that the Licensees operate in accordance with the terms of the Licence and in a neighbourly way." [our emphasis]*

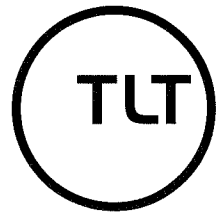
Put simply, the Applicant could not be more mindful of the conditions attached to its permission and is going above and beyond to ensure full compliance with the conditions. Given that the conditions are not being ignored, rather that they are being constantly assessed, monitored, enforced and complied with, then presumably Councillor Glanz would be the first to support the Applicant and congratulate them for so doing?

The Applicant operates strictly in accordance with the terms of the SEV licence and does so in a neighbourly way. The Applicant is always happy to discuss concerns with local people.

Conclusion

In accordance with the LGMPA 1982 and the SEV policy, there are limited grounds upon which the Committee can refuse to renew a SEV licence. I hope that by writing in advance of the hearing I have in some measure explained how the Applicant deals with the SEV Policy and promotes the SEV Policy objectives. As stated above, the Applicant is under no illusions that it is one of the lucky few permitted to operate a SEV in Westminster. With this in mind the Applicant takes measures to jealously guard the sanctity of its SEV and premises licences making sure that it goes above and beyond in terms of assessing risk and putting in place measures and procedures to mitigate risk. I ask that you grant the renewal of this SEV licence as requested.

I am sure that the Committee will have questions for both the Applicant and the objectors at the hearing and we will be happy to answer them and I thank you in advance for taking the time to read this letter and the small bundle of accompanying documents.



Yours sincerely

Luke Elford
Associate
for TLT LLP
enc.

VANITY BAR

**APPLICATION TO
RENEW A SEV
LICENCE**

**APPLICANT'S
SUPPORTING
EVIDENCE**

Westminster City Council

Licensing Sub-Committee

28 March 2019

Vanity Bar & Nightclub, 4 Carlisle Street, London W1D 3BJ

Application to a renew a SEV licence

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STATEMENT OF Andrew Bamber

I Andrew Bamber will state as follows

1. I have been asked by Mr Luke Elford of TLT solicitors of 20 Gresham Street, London, EC2V 7JE to provide a statement about my work with Vanity, a venue that operates with a Sexual Entertainment Licence at 4 Carlisle St, Soho, W1D 3BJ-19
2. I am aware that there is an application for the renewal of the Sexual Entertainment Licence and that there have been objections to the application that relate to the activity of Pedicabs and a noise emanating from the venue.

Personal summary

3. I was a police officer in the Metropolitan Police and retired 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 having managed 2 London Boroughs.
4. 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.
5. 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 over 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.
6. As Detective Superintendent I was a senior investigating officer in the Metropolitan Police anti-corruption command investigating police corruption and serious incidents that presented a risk to the reputation of the organisation.
7. 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 respon-

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

8. I have also represented HM Government overseas working in foreign missions, and I was a Public Order Commander trained in crowd management and crowd control.
9. 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.
10. When working for the Council I had responsibility for a wide ranging Safer Communities portfolio that included the Council, and the Partnership Crime Reduction Strategies. The role also included the Council's enforcement function, all licensing functions including the development of Licensing policies and enforcement policies, Environmental Health, Trading Standards, the Drug and Alcohol Team, CCTV, Corporate Health and Safety, and Emergency Planning and Civil Contingencies, and many more corporate services and corporate roles.
11. 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. Amongst the many roles I had responsibility for the Council's night time economy and the impact that it had on communities. In this role I worked closely with the local policing teams to ensure that licensed premises were effectively supervised and managed in line with local initiatives, the licensing objectives, 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 partnership enforcement policies, and crime and disorder initiatives linked to drugs and alcohol.
12. I delivered a structured approach to licensing management, supervision, and enforcement, the Council's Community Safety Plan, the Enforcement Policy, and the 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.
13. On my retirement from Local Government I set up my own compliance consultancy and I now offer independent advice, environmental audits, and compliance audits and risk assessments for licensed premises. The compliance visits are both overt and covert.
14. I have a Masters Degree in Business Administration, I am a member of the Institute of Licensing and have completed the Alcohol Personal Licence Course.
15. 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 an Authorising Officer for Covert surveillance.
16. I have been involved with Nags Head Ltd, the owners of Vanity, since May 2017. During that time I have introduced a due diligence model, reviewing, and where appropriate, redesigning the policies and operating procedures for the venue, and conducting annual risk assessments on the all of the operating procedures and licence conditions.
17. The due diligence model also includes conducting overt and covert licensing visits to the venue. These compliance visits are the same as the overt licensing visits undertaken by the police and

licensing officers. The covert visits or 'test purchases' are also the same as those conducted by police forces across the country or 'mystery shopping exercises' conducted by many organisations and businesses to test their employees compliance with their company rules and policies. The visits are arranged on a date and time without the prior knowledge of the owners or management team. At the conclusion of the visit a full report is supplied to the owner.

18. The risk assessment process identified a specific risk, posed to the venue, by the activities of street touts and pedicabs that operate in the Soho area. These individuals suggest to members of the public that they work for various venues.
19. In addition to the risk assessment the issue was also highlighted in the overt visit reports from January 2018. Both entries underline the significance that the owners place on the threat that such individuals pose, especially when the activities of such individuals are beyond the scope of their influence. Street based enforcement is the province of the police and local authority enforcement teams. Copies of the risk assessment entry and an overt visit extract is attached at exhibit AB1
20. During the last renewal process I am aware that there was an objection to the licence and that in part it related to the activities of Pedicabs in the street outside the venue. As a result the owners met with the council officers and a neighbour of the venue to fully understand the concerns and assist where possible.
21. The condition on the licence is that management will not conduct any business by way of 'touting' in the west end. Therefore as long as the owners do not engage with and specifically use pedicabs to tout for business then the management of street based activity is actually a matter for the council and the police to deal with, not the owners of premises operating in the Soho area. Notwithstanding this the owners, with a desire to work in partnership with the police and licensing team, undertook to employ a street marshal, at their own expense, in an attempt to keep Carlisle Street free of Pedicabs. Even though the owners and street marshal have no powers to deal with the issue.
22. The intention of the street marshal initiative was to try and ensure that pedicabs frequenting the Dean Street area did not park outside the venue, as they do elsewhere in Soho. The pedicabs are asked to park, and if possible, they are directed into the part of Dean Street running north of Carlisle Street.
23. From the outset of my involvement with Nags head Ltd both the covert and overt licensing visits test the touting condition by walking around the area before and after the visits to assess the street activity associated with touting. Since the objections last year these visits also started to look at the pedicab activity around the junction with Dean Street and Carlisle Street. This location appears to be a significant location to attract customers that are walking from Oxford Street into Soho or leaving the area towards Oxford Street
24. In total there has now been 16 covert visits and 14 overt visits to the venue and there has never been a reported problem with street touting, or problems with the activity of Pedicabs outside the venue itself. I have attached exhibit AB1 that highlights an overt visit report and exhibit AB2 provides extracts from the covert visits.
25. In addition to the structured visits to Vanity I often walk in the west end late at night while working on other projects. As part of my evening or night time agenda, since the objections last year, I walk past the front of Vanity as a cursory check for the owners to report on any street activity.

26. I have never witnessed numbers or groups of pedicabs parked in Carlisle Street outside the venue. I have noticed that the street marshal has had a more difficult task since the Cross Rail project moved the road works further down Dean Street effectively closing the north part of Dean Street where it was agreed that Pedicabs could be asked to park if they turned up in Carlisle Street to wait for customers. Any pedicab that turns up waiting for customers in and around Dean Street are asked to park on the east side of Carlisle Street and Dean Street well away from the venue. On the occasions that I have witnessed this there has never been more than 2-3 pedicabs and the behaviour of the pedicab operators has not been a cause for concern.
27. The other element of this years objection has been that noise emanates from the venue. This is another condition on the Sexual Entertainment Venue licence and it is assessed on each of the covert and overt visits. None of the visits has identified that the noise is loud or that it emanates from the venue. On each occasion the I have visited the venue I have stood on the door threshold and been unable to hear any noise/music coming from the venue. Even when the outer door is opened the music cannot be heard because there is a second or inner door. The risk assessment and overt visits check the compliance of the noise limiter condition.

EXHIBIT AB 1

Risk assessment entry

7	<p>The licence holder or other person concerned in the conduct or management of the premises shall not seek to obtain custom by means of personal solicitation or touting, nor enter into any agreement with a third party to do so.</p>	<p>The individuals conducting overt and covert visits to the venue walk around Soho within the vicinity of of the venue and they have never been touted by Vanity personnel. Not even by the door staff when standing outside the premises.</p> <p>The owners do not employ touts or encourage touting in any form. In the past they have reported the activity of opportunists that operate as touts in Soho as a whole.</p> <p>On each occasion that the covert visits were undertaken the operatives were touted by these independent touts in Soho. During the discussion with the touts about which venue to be taken to they have readily acknowledged that they do not work for the Vanity but are <i>'independents'</i> working Soho.</p>	8	<p>The activity of touts that give the impression that they work for the venue present a risk for the owners if officers from the LA or the police are touted during their routine visits. Or if members of the public (especially visitors to London) complain to the LA about the activity of these individuals believing that they work for the venue.</p> <p>The problem also extends to the rickshaw drivers operating around Soho.</p> <p>Any incidents should be recorded in the incident log.</p> <p>Every time a visit is made by the LA and the police the problem should be brought to their attention and the fact recorded in the incident log that should also be signed by the officer. Every time an overt or covert visit is made to the premises the activity of the touts should be recorded so that the problem can be raised with the LA.</p>			4
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Extract from an overt visit report in January 2018

7	<p>The licence holder or other person concerned in the conduct or management of the premises shall not seek to obtain custom by means of personal solicitation or touting, nor enter into any agreement with a third party to do so.</p>	<p>✓ <input type="checkbox"/></p>	<p>Prior to the visit there was a walk around the venue to see if there was any solicitation on behalf of the venue. There was none.</p> <p>Street touts that operate in the area and claim to work on behalf of establishments present a risk. They are not condoned or fraternised with by the venue.</p> <p>An additional threat raised by a complaint is the nuisance caused by Pedicabs. Although not encouraged or used by the venue they gravitate to late night establishments. Advice given to the DPS not to engage with them and to record any incidents in the incident log for the information of the LA.</p>
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Visits

I have include a number of extracts from the covert visits that were undertaken in Vanity. The dates and times of these visits were not known to the owners until after the visit had taken place. The 'Customer' is primarily concerned with conduct at the door and inside the venue so they will not necessarily report on the activity of Pedicabs prior to March last year. Where there is no comment in the report then the 'Customer' did not notice anything untoward in the street outside the venue.

• 19th December 2018:

1. The outside of the club appeared to be well maintained. I did not see any black cabs or pedicabs positioned outside waiting for fares.
2. I could not hear any noise from outside

• 15th December 2018:

1. As I left the club, I noticed that the road was clear of cabs and pedicabs and that there was a male standing on the other side of Carlisle Street who appeared to be watching out for them touting for customers.
2. I could not hear any noise

• 8th December 2018:

1. I was not approached by any person touting for the Vanity Club and I did not observe any material displayed advertising the nature or services of the club anywhere outside the venue.
2. I could not hear any music or noise from within that would cause a nuisance

• 27th July 2018:

1. I stood there for about five minutes but saw no touting for the premises.
2. I could not hear any music from outside or any other noise coming from the inside.

• 16th June 2018

1. I saw that the front doors of the club were closed. The outside of the club appeared to be well maintained. I did not see any black cabs or pedicabs positioned outside waiting for fares.
2. I again monitored the outside of the premises and I saw that there two pedicabs parked about 50 yards from the club.

• 15th March 2018

1. Nor was there any touting for business.

• 23rd February 2018

1. I did not see or hear any touting for business.
2. I could not hear any noise from outside and it was well lit.

3. The outside of the club appeared to be well maintained. I did not see any black cabs or pedicabs positioned outside waiting for fares during my visit.
4. I again monitored the outside of the premises and I did not see any black cabs or pedicabs waiting for customers outside.

• **30th January 2018**

1. There was no vehicular traffic in the road where Vanity is located at all during my observation.
2. On exiting I looked in the road again there was no vehicular traffic.

• **15th December 2017**

1. There were no touts operating in Carlisle Street or Dean Street.
2. There was no noise or music coming from the premises
3. Not approached by anybody touting any other service

13th October 2017

1. I noticed no excessive noise or music coming from the premises
2. As I walked away from the premises I was not approached by anybody touting

• **11th October 2017**

1. I could not hear any noise from outside and it was well lit.

• **5th October 2017**

1. I stood there for about ten minutes but saw no touting for the premises.
2. I went to enter the premises. I could not hear any music from outside or any other noise coming from the inside.

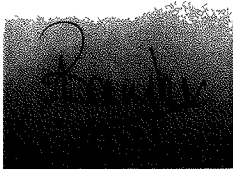
• **27th September 2017**

1. No persons touting for business.

• **11th August 2017**

1. When entering and leaving the premises there was no audible noise emanating from the venue

Signed: A. Bamber



VANITY BAR & NIGHTCLUB

Touting and Pedicab policy (revised October 2018)

This policy should be read in conjunction with the Venue's Street Management Policy.

The Management of Vanity understands and recognises the problems that exist in Soho in relation to touting and pedicabs. Both issues are dealt with in the Venue's Risk Assessment.

There is a no touting condition on the Venue's SEV licence that is rigorously managed and complied with.

The management of Vanity view the unlicensed activity of pedicab drivers exactly the same as street touting and do not encourage or condone their activity and do not wish the Venue to be associated with their activities.

There is also a recognition that street based enforcement is an issue for the police and local authority but notwithstanding that we will work in partnership with the authorities to find a workable solution if problems arise near our venue.

To this end the management will;

- Employ a Designated Member of Staff who will work in Carlisle Street outside the Venue during the early hours of the morning, specifically from 01:00 to 03:00 when the Venue is open to the public.
- The Designated Member of Staff is tasked with encouraging pedicab drivers that look for fares in the Dean Street area to respect the needs of local residents by being quiet and also ask them to move away/not congregate in Carlisle Street or near the Venue.
- The Designated Member of Staff has no specific powers to make the pedicab drivers move on, but he/she will use reasonable efforts to ensure that they do. The Venue is keen to ensure that any interaction between the staff member and the pedicab drivers doesn't inadvertently lead to disturbance where a pedicab driver refuses to comply with staff requests.
- The Designated Member of Staff will record relevant interactions with rickshaw or pedicab drivers in the Venue's incident log as necessary. As the Venue is required to share its incident log with officers of the City Council the Venue will share information with the City Council in furtherance of any specific enforcement work by the authorities around nuisance caused by pedicabs in the Soho area.
- The Venue will hold regular briefings with its SIA door supervisors and reminded them of the need to maintain a professional attitude when working on the door of the venue,

specifically not to be observed to be in conversation with pedicab operators other than to ask them politely to move away from the venue.

- It is essential and part of our extended social responsibility that both the door supervisors and the street marshal look after the interests of neighbours even though they have no official powers to intervene in street based activity.
- The management and door staff will work with WCC enforcement officers to curtail the activity of pedicab drivers in and around Carlisle Street and Dean Street.

Vanity

STREET MANAGEMENT POLICY

1. Management of Vanity Bar recognise their responsibility for the orderly arrival and dispersal of customers and the cleanliness of the area immediately outside the venue.
2. To promote public safety and prevent public nuisance the arrival and departure of customers will be managed by the dedicated door security.
3. At least 1 door supervisor will monitor the roadside area to assist in the safe and orderly arrival and dispersal of customers.
4. This policy will be supported by all security staff who will be wearing distinctive uniforms and displaying their SIA accreditation at all times to distinguish them from customers and members of the public.
5. Vanity Bar shall display signage at the exit reminding customers to leave quietly and have respect for residents.
6. Staff will monitor, and where possible, control traffic on Carlisle Street in line with this Plan.
7. Customers arriving by car are to be met at the kerbside and directed to the entrance. The customer will always be held within the entrance whilst entry is approved.
8. Once a car has dropped off a passenger, the driver is to be encouraged to leave Carlisle Street without lingering.
9. Any private hire vehicles are to be encouraged to park away from Carlisle Street and will be required to switch off their engines whilst waiting for customers.
10. Vanity Bar works in partnership with the police and the local council to prevent nuisance in Carlisle Street. This extends to the activities of Pedicab operators in Soho.
11. Vanity will employ a street marshal to manage, as far as is possible, the pedicabs in and around Dean Street. If they start to arrive outside the venue looking for customers as people leave Vanity the operators are to be asked to park in the north end of Dean Street or the east side of Carlisle Street away from the venue.
12. Patrons wishing to hail a black cab shall be directed onto Dean Street or Oxford Street to avoid causing a nuisance on Carlisle Street.
13. Any patron entering the street from Vanity Bar in order to smoke shall be redirected to a small smoking area outside the premises. Patrons are not to take drinks outside the premises under any circumstances and they are supervised by the door staff.
14. Any entertainer wishing to smoke a cigarette will do so outside and no more than 2 dancers at any one time will be allowed outside. Entertainers will not accompany customers outside to smoke a cigarette.
15. There will be no more than 7 people allowed outside at any one time. The door supervisor will manage the numbers and remind people to keep quiet while outside the entrance.
16. A dedicated telephone number for the DPS or the duty manager will be maintained for use by any person who may wish to make a complaint during the operation of the licence. It will also be provided to

the licensing authority and local residents associations. Any change to the number shall be notified to the licensing authority and to local residents associations within 7 days of the change.



7	<p>The licence holder or other person concerned in the conduct or management of the premises shall not seek to obtain custom by means of personal solicitation or touting, nor enter into any agreement with a third party to do so.</p>	<p>The individuals conducting overt and covert visits to the venue walk around Soho within the vicinity of of the venue and they have never been touted by Vanity personnel. Not even by the door staff when standing outside the premises.</p> <p>The owners do not employ touts or encourage touting in any form. In the past they have reported the activity of opportunists that operate as touts in Soho as a whole.</p> <p>On each occasion that the covert visits were undertaken the operatives were touted by these independent touts in Soho. During the discussion with the touts about which venue to be taken to they have readily acknowledged that they do not work for the Vanity but are '<i>independents</i>' working Soho.</p>	8	<p>The activity of touts that give the impression that they work for the venue present a risk for the owners if officers from the LA or the police are touted during their routine visits or members of the public (especially visitors to London) complain to the LA about the activity of these individuals believing that they work for the venue.</p> <p>The problem also extends to the rickshaw drivers operating around Soho.</p> <p>Any incidents should be recorded in the incident log.</p> <p>Every time a visit is made by the LA and the police the problem should be brought to their attention and the fact recorded in the incident log that should also be signed by the officer.</p> <p>Every time an overt or covert visit is made to the premises the activity of the touts should be recorded so that the problem can be raised with the LA.</p>			4
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12 February 2019

Mr Luke Elford
TLT LLP
20 Gresham Street
EC2V 7JE

By email to: Luke.Elford@TLTsolicitors.com

Our ref: 19020819

Dear Luke

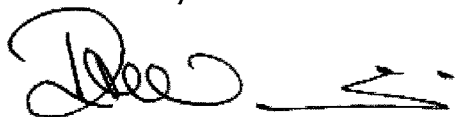
Re: Vanity Soho, 4 Carlisle Street, W1D 3BJ

I am pleased to update you following my inspection of the premises on 29th January 2019. The sound system at Vanity Soho consists of relatively low-power professional sound equipment. The equipment rack is in the office in the basement and each zone has a separate remote gain control. There are two loudspeakers in the basement, three on the ground floor and two on the first floor. There are no additional bass bins anywhere in the building. The limiter has been set for each of the three floors and cannot be over-ridden. I took the original settings (which I believe were carried out by Ian Watson from WCC) and I have reduced the level so that maximum power, as set by turning the zone remote panel to "10", does not exceed the stated limiter level. I have also ensured that all equipment in the office is now behind a tamperproof panel. Each amplifier gain control is now labelled so that an individual speaker can be turned down, but not up. A detailed limiter calibration certificate is attached.

There was a small amount of noise breakout through the ground floor front façade. This would not constitute a Public Nuisance under the Licensing Act 2003 and as far as I was able to assess it would not be a Statutory Nuisance under the Environmental Protection Act 1990. I recommended that the blacked out window to the front is over-boarded with two layers of high mass lining material (eg 15mm Soundbloc plasterboard or 22mm plywood), glued and screwed in place using generous quantities of silicon sealant to ensure an airtight fit and I understand that this work has now been completed.

Access to the residents' flats was not possible but the sound system is now set, and limited, and tamperproof. In my opinion the operating level of the sound system is unlikely to cause material interference to a resident in a nearby flat. Please do not hesitate to contact me if I can be of any further assistance.

Yours sincerely



Richard Vivian BEng(Hons) MIET MIOA MAES MIOL
Director, Big Sky Acoustics Ltd

Attachment: Limiter Calibration Certificate

This is a certificate for the calibration of music noise limiter device installed on the premises as described below.

Name of premises: Vanity Soho
 Address of premises: 4 Carlisle Street, London, W1D 3BJ
 Management details: Manpal Singh Clair
 Limiter device: Formula Sound AVC-2D
 Location of device: Equipment rack in office in basement
 Anti-tamper measures: Office is locked. Sound equipment is in rack with all positive gain controls behind tamperproof panels. Limiter checked with all amplifier gains on maximum. AVC-2D is rack mounted, limit threshold level adjustment and connectors are tamperproof.

Description of music system: Permanently installed professional sound system consisting of 7 Citronic CX-8088B loudspeakers (85Hz - 19kHz/100W rms), no separate bass loudspeakers, Cloud CX-263 zone mixer with remotes for each zone, 1 x Crown and 1 x QSC amplifier.

The above equipment has been measured at maximum operating level as shown below:

Location	L _{Aeq,5min}	L _{Zeq,5min}	Leq,5min 63Hz	Leq,5min 125Hz
Basement	89	94	82	89
Ground floor	87	95	85	93
First floor	88	93	74	81

All measurements are spatial averages in the areas indicated.

This calibration certificate is valid only for the equipment as specified above.



Date: 29th January 2019

Richard Vivian BEng(Hons) MIET MIOA MAES MIOL
 Principal Acoustic Consultant, Big Sky Acoustics Ltd
 Institute of Acoustics Membership Number: 43620

Instrumentation record: Measurements were carried out using a Cirrus type CR:171B integrating-averaging sound level meter #G056799 with real-time 1:1 & 1:3 Octave band filters and audio recording conforming to the following standards: IEC 61672-1:2002 Class 1, IEC 60651:2001 Type 1 I, IEC 60804:2000 Type 1, IEC 61252:1993 Personal Sound Exposure Meters, ANSI S1.4-1983 (R2006), ANSI S1.43-1997 (R2007), ANSI S1.25:1991. 1:1 & 1:3 Octave Band Filters to IEC 61260 & ANSI S1.11-2004.

Description

Cirrus sound level meter
 Cirrus pre-polarized microphone
 Cirrus microphone pre-amplifier
 Cirrus class 1 acoustic calibrator

type CR:171B
 type MK:224
 type MV:200E
 type CR:515

The calibration of the measuring equipment was checked prior to and immediately following the tests and no signal variation occurred. Calibration of equipment is traceable to national standards.

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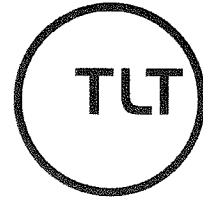


Figure 1: Equipment rack is located in basement office. Note: AVC2-D limiter at top of rack. Mixer/zoner and all gain controls behind tamperproof panels.

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Our ref 303L/LE06/099147/000025
Your ref



To whom it may concern

By email only via Westminster Licensing Team

Direct tel	+44 (0)333 006 1358	Date	25 January 2019
Direct fax	+44 (0)333 006 0011	Email	luke.elford@tltsolicitors.com

Dear Sir or Madam

Nags Head Ltd - Vanity Bar, 4 Carlisle Street - Application to renew the Sexual Entertainment Venue (SEV) Licence

First of all, please allow me to apologise for the somewhat impersonal nature of this letter.

I would have liked to have addressed this letter to you personally, but as you may be aware, in relation to objections under the Local Government (Miscellaneous Provisions) Act 1982 the council are not obliged to provide us with your contact details (unlike under the Licensing Act 2003 where they are) and have not done so. I am therefore sending this letter to you via the council.

I act for Vanity Bar in relation to Sexual Entertainment Venue Licence and Premises Licence matters.

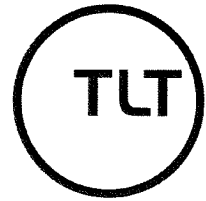
My client is in receipt of your objection to the renewal of its SEV licence. They are, and I am, very sorry to hear that you feel you are being disturbed by music noise. My client does not want anyone to be disturbed and is keen to help find the root cause of the issue and remedy it.

You may be aware that there are a number of conditions on my client's licences (both SEV and premises) in relation to noise escape from the venue.

In particular, both the SEV licence and the premises licence require my client to have installed a noise limiter which is fitted to the musical amplification system. The limiter is locked so that it cannot be interfered with. Since my client took over the premises there has always been a noise limiter installed. It was set in the presence of one of Westminster's Environmental Health officers and the noise levels have been kept under review ever since. Those assessments have been made from inside Vanity and what he have not done thus far is assess the noise from within neighbouring residential units, which is something we would like to offer.

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My client has appointed an acoustic consultant in the person of Richard Vivian of Big Sky Acoustics. Richard is an extremely experienced acoustician who works with private clients, residents and local authorities in the context of licensed premises and noise related issues. If you wish to satisfy yourself of Richard's credentials then please do take the time to visit his website at www.bigskyacoustics.co.uk

We would like to invite you to book an appointment with Mr Vivian to attend your property and take acoustic measurements to help inform any adjustments to the noise limiter.

If you would like to book an appointment then please contact me by email and I will put the necessary arrangements in place.

I look forward to hearing from you.

Yours faithfully


Luke Elford
Associate
for TLT LLP

Luke Elford

From: Gadd, Daisy: WCC <dgadd@westminster.gov.uk>
Sent: 01 February 2019 10:30
To: Luke Elford; Rowe, Steven: WCC
Cc: Licensing: WCC; Watson, Ian: WCC
Subject: RE: 18/15940/LISEVR - Vanity Bar, 4 Carlisle Street - SEV renewal [TLT-TLT.FID5631301]

Hi Luke

Hope all is well!

I can confirm that your correspondence has now been sent through to the objectors. I will let you know if I hear anything back from the objectors who do not wish to waive their right to anonymity as I have said that the Licensing Service are happy to facilitate any process of mediation.

The hearing is still set for 26 February 2019, although this is a provisional date so it may be subject to change.

Thanks

Daisy Gadd
Senior Practitioner for Licensing
Licensing Service
Public Protection and Licensing

Westminster City Council
22nd Floor
Portland House
Bressenden Place
London SW1E 5RS

0207 641 2737 (Internal 2737)
0207 641 6500 (Contact Centre)
dgadd@westminster.gov.uk
Westminster.gov.uk



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From: Luke Elford <Luke.Elford@TLTsolicitors.com>
Sent: 25 January 2019 14:39
To: Rowe, Steven: WCC <srowe@westminster.gov.uk>; Gadd, Daisy: WCC <dgadd@westminster.gov.uk>
Cc: Licensing: WCC <Licensing@westminster.gov.uk>; Watson, Ian: WCC <iwatson@westminster.gov.uk>
Subject: 18/15940/LISEVR - Vanity Bar, 4 Carlisle Street - SEV renewal [TLT-TLT.FID5631301]

Dear Steve and/or Daisy (if back from holiday)

Further to the above please find attached a letter which I would be grateful if you would pass on to the residential objectors in this case.

Ian – I am copying you in (Richard Vivian may already have been in touch with you direct?) for transparency and for if you want to be involved in any re-setting of the noise limiter, noise assessments and what have you.

Steve/Daisy – hearing seems to be set for 26 Feb, is that correct?

Kind regards

Luke Elford
Associate
for TLT LLP
D: +44 (0)333 006 1358
M: 07799 414692
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Luke Elford

From: Hamida, Bushara: WCC <bhamida@westminster.gov.uk>
Sent: 05 November 2018 16:09
To: Luke Elford
Cc: Police Tens: WCC; Ehtens: WCC; TEN's Mailboxes: WCC
Subject: 18/13475/LITENP - 4 Carlisle Street
Attachments: 18-13475-LITENP - Application Form.pdf

Dear Manpal Singh Clair

PREMISES: Vanity Bar And Nightclub, Basement To First Floor, 4 Carlisle Street
EVENT DATE: 29 November 2018 - 1 December 2018

I acknowledge receipt of your temporary event notice. Please attach this letter to a copy of the notice and retain both documents at the event and available for inspection if required. The statutory administration fee of £21 has also been received.

The Police and the Environmental Health Service can object to your temporary event notice. Such an objection must be lodged with the Licensing Authority within three working days of the date and time they receive a copy of the notice.

If the Police and/or the Environmental Health Service object and their concerns are not addressed, the matter will be referred to a hearing before the Licensing Sub-Committee. The Committee may allow the event to go ahead, or alternatively issue a counter-notice making it illegal for the event to take place. If an objection is lodged and a hearing is required we will send you a notice of hearing setting out the time, date and location of the public hearing.

However, if agreement can be reached to amend the Temporary Event Notice that will address the responsible authorities concerns, they may withdraw their objection. If they do, permission for the event to go ahead will be granted and no hearing will be required.

If you have any questions relating to this acknowledgement please do not hesitate to contact the Licensing Service on 020 7641 1884 or alternatively email tens@westminster.gov.uk.

Yours sincerely


Bushara Hamida
Senior Licensing Officer

Licensing Team
Public Protection & Licensing
Westminster City Council
22nd Floor
Portland House
Bressenden Place
Victoria
London SW1E 5RS

Telephone: 020 7641 6500
E-mail: bhamida@westminster.gov.uk
Web: www.westminster.gov.uk/licensing



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Luke Elford

From: Hamida, Bushara: WCC <bhamida@westminster.gov.uk>
Sent: 05 November 2018 16:17
To: Luke Elford
Cc: Police Tens: WCC; Ehtens: WCC; TEN's Mailboxes: WCC
Subject: 18/13477/LITENP - 4 Carlisle Street
Attachments: 18-13477-LITENP - Application Form.pdf

Dear Manpal Singh Clair

PREMISES: Vanity Bar And Nightclub, Basement To First Floor, 4 Carlisle Street
EVENT DATE: 4 December 2018 – 9 December 2018

I acknowledge receipt of your temporary event notice. Please attach this letter to a copy of the notice and retain both documents at the event and available for inspection if required. The statutory administration fee of £21 has also been received.

The Police and the Environmental Health Service can object to your temporary event notice. Such an objection must be lodged with the Licensing Authority within three working days of the date and time they receive a copy of the notice.

If the Police and/or the Environmental Health Service object and their concerns are not addressed, the matter will be referred to a hearing before the Licensing Sub-Committee. The Committee may allow the event to go ahead, or alternatively issue a counter-notice making it illegal for the event to take place. If an objection is lodged and a hearing is required we will send you a notice of hearing setting out the time, date and location of the public hearing.

However, if agreement can be reached to amend the Temporary Event Notice that will address the responsible authorities concerns, they may withdraw their objection. If they do, permission for the event to go ahead will be granted and no hearing will be required.

If you have any questions relating to this acknowledgement please do not hesitate to contact the Licensing Service on 020 7641 1884 or alternatively email tens@westminster.gov.uk.

Yours sincerely

Bushara Hamida
Senior Licensing Officer

Licensing Team
Public Protection & Licensing
Westminster City Council
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Telephone: 020 7641 6500
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Luke Elford

From: Hamida, Bushara: WCC <bhamida@westminster.gov.uk>
Sent: 05 November 2018 16:20
To: Luke Elford
Cc: Police Tens: WCC; Ehtens: WCC; TEN's Mailboxes: WCC
Subject: 18/13479/LITENP - 4 Carlisle Street
Attachments: 18-13479-LITENP - Application Form.pdf

Dear Manpal Singh Clair

PREMISES: Vanity Bar And Nightclub, Basement To First Floor, 4 Carlisle Street
EVENT DATE: 11 December 2018 - 16 December 2018

I acknowledge receipt of your temporary event notice. Please attach this letter to a copy of the notice and retain both documents at the event and available for inspection if required. The statutory administration fee of £21 has also been received.

The Police and the Environmental Health Service can object to your temporary event notice. Such an objection must be lodged with the Licensing Authority within three working days of the date and time they receive a copy of the notice.

If the Police and/or the Environmental Health Service object and their concerns are not addressed, the matter will be referred to a hearing before the Licensing Sub-Committee. The Committee may allow the event to go ahead, or alternatively issue a counter-notice making it illegal for the event to take place. If an objection is lodged and a hearing is required we will send you a notice of hearing setting out the time, date and location of the public hearing.

However, if agreement can be reached to amend the Temporary Event Notice that will address the responsible authorities concerns, they may withdraw their objection. If they do, permission for the event to go ahead will be granted and no hearing will be required.

If you have any questions relating to this acknowledgement please do not hesitate to contact the Licensing Service on 020 7641 1884 or alternatively email tens@westminster.gov.uk.

Yours sincerely

Bushara Hamida
Senior Licensing Officer

Licensing Team
Public Protection & Licensing
Westminster City Council
22nd Floor
Portland House
Bressenden Place
Victoria
London SW1E 5RS

Telephone: 020 7641 6500
E-mail: bhamida@westminster.gov.uk
Web: www.westminster.gov.uk/licensing



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www.westminster.gov.uk

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You should not disclose the contents to any other person or take copies.

Luke Elford

From: Hamida, Bushara: WCC <bhamida@westminster.gov.uk>
Sent: 05 November 2018 16:24
To: Luke Elford
Cc: Police Tens: WCC; Ehtens: WCC; TEN's Mailboxes: WCC
Subject: 18/13481/LITENP - 4 Carlisle Street
Attachments: 18-13481-LITENP - Application Form.pdf

Dear Manpal Singh Clair

PREMISES: Vanity Bar And Nightclub, Basement To First Floor, 4 Carlisle Street
EVENT DATE: 18 December 2018 - 23 December 2018

I acknowledge receipt of your temporary event notice. Please attach this letter to a copy of the notice and retain both documents at the event and available for inspection if required. The statutory administration fee of £21 has also been received.

The Police and the Environmental Health Service can object to your temporary event notice. Such an objection must be lodged with the Licensing Authority within three working days of the date and time they receive a copy of the notice.

If the Police and/or the Environmental Health Service object and their concerns are not addressed, the matter will be referred to a hearing before the Licensing Sub-Committee. The Committee may allow the event to go ahead, or alternatively issue a counter-notice making it illegal for the event to take place. If an objection is lodged and a hearing is required we will send you a notice of hearing setting out the time, date and location of the public hearing.

However, if agreement can be reached to amend the Temporary Event Notice that will address the responsible authorities concerns, they may withdraw their objection. If they do, permission for the event to go ahead will be granted and no hearing will be required.

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Yours sincerely

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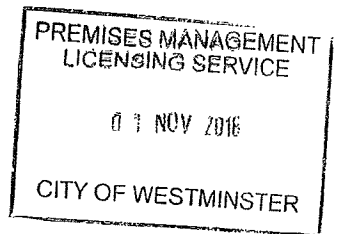
Find out how much sugar is in your food and drink and make a healthy change to improve your family's health by downloading the free Change4Life Be Food Smart app today at
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You should not disclose the contents to any other person or take copies.



Temporary Event Notice

Before completing this notice, please read the guidance notes at the end of the notice. If you are completing this notice by hand, please write legibly in block capitals. In all cases, ensure that your answers are inside the boxes and written in black ink or typed. Use additional sheets if necessary. You should keep a copy of the completed notice for your records. You must send at least one copy of this notice to the licensing authority and additional copies must be sent to the chief officer of police and the local authority exercising environmental health functions for the area in which the premises are situated. The licensing authority will give to you written acknowledgement of the receipt of the notice.

I, the proposed premises user, hereby give notice under section 100 of the Licensing Act 2003 of my proposal to carry on a temporary activity at the premises described below.

1. The personal details of premises user (Please read note 1)			
1. Your name			
Title	Mr <input checked="" type="checkbox"/> Mrs <input type="checkbox"/> Miss <input type="checkbox"/> Ms <input type="checkbox"/> Other (please state)		
Surname	CLAIR		
Forenames	MANPAL SINGH		
2. Previous names (Please enter details of any previous names or maiden names, if applicable. Please continue on a separate sheet if necessary)			
Title	Mr <input checked="" type="checkbox"/> Mrs <input type="checkbox"/> Miss <input type="checkbox"/> Ms <input type="checkbox"/> Other (please state)		
Surname	SINGH		
Forenames	MANPAL		
3. Your date of birth	Day 15	Month 02	Year 1983
4. Your place of birth	Newham, London, UK		
5. National Insurance Number	JH 62 94 75 D		
6. Your current address (We will use this address to correspond with you unless you complete the separate correspondence box below)			
FLAT 3001 3 PAN PENINSULA SQUARE			
Post town LONDON		Postcode E14 9HQ	
7. Other contact details			
Telephone numbers Daytime	Please call TLT LLP (Luke Elford – see alternative contact details) in the first instance 020 7426 0830		
Evening (optional)	07950524330		
Mobile (optional)	as above		
Fax number (optional)	none		
E-Mail address (if available)	manpal_singh_clair@hotmail.com		
8. Alternative address for correspondence (If you complete the details below, we will use this address to correspond with you)			

FAO: Luke Elford TLT LLP 20 Gresham Street	
Post town LONDON	Postcode EC2V 7JE
9. Alternative contact details (if applicable)	
Telephone numbers: Daytime	0333 006 1358
Evening (optional)	07799414692
Mobile (optional)	as above
Fax number (optional)	none
E-Mail address (if available)	luke.elford@tltsolicitors.com

2. The premises	
Please give the address of the premises where you intend to carry on the licensable activities or, if it has no address, give a detailed description (including the Ordnance Survey references) (Please read note 2)	
Vanity Bar & Nightclub 4 Carlisle Street London W1D 3BJ	
Does a premises licence or club premises certificate have effect in relation to the premises (or any part of the premises)? If so, please enter the licence or certificate number below.	
Premises licence number	15/03179/LIPDPS (original ref: 05/03985/LIPCV)
Sex establishment licence number	17/14637/LISEVR (original ref: 12.92694/LISEVN)
If you intend to use only part of the premises at this address or intend to restrict the area to which this notice applies, please give a description and details below. (Please read note 3)	
n/a	
Please describe the nature of the premises below. (Please read note 4)	
Fully licensed sexual entertainment venue (nude striptease)	
Please describe the nature of the event below. (Please read note 5)	
Extension to hours for all licensable activities permitted by the premises and sex establishment licences currently in force at the premises.	
The applicant undertakes to comply with all of the conditions of the premises and sex establishment licences currently in force at the premises save as they might conflict with the purpose of this notice which is as follows:	
To increase the hours for licensable activities until 05:00 the day following on Thursday, Friday and Saturday nights.	
Replace condition 32, Annex 3 to read "The Notice Giver will not permit more than 10 smokers immediately outside the premises at any time".	

3. The licensable activities		
Please state the licensable activities that you intend to carry on at the premises (please tick all licensable activities you intend to carry on). (Please read note 6)		
The sale by retail of alcohol		<input checked="" type="checkbox"/>
The supply of alcohol by or on behalf of a club to, or to the order of, a member of the club		<input type="checkbox"/>
The provision of regulated entertainment (Please read note 7)		<input checked="" type="checkbox"/>
The provision of late night refreshment		<input checked="" type="checkbox"/>
Are you giving a late temporary event notice? (Please read note 8)		<input type="checkbox"/>
Please state the dates on which you intend to use these premises for licensable activities. (Please read note 9)		
29/11/18 – 01/12/18 (notice 1) – 1 x TEN = 3 days		
Please state the times during the event period that you propose to carry on licensable activities (please give times in 24 hour clock). (Please read note 10)		
From 03:00 on 29/11/18 to 05:00 on 01/12/18 (notice 1)		
Please state the maximum number of people at any one time that you intend to allow to be present at the premises during the times when you intend to carry on licensable activities, including any staff, organisers or performers. (Please read note 11)		175
If the licensable activities will include the sale or supply of alcohol, please state whether these will be for consumption on or off the premises, or both (please tick as appropriate). (Please read note 12)	On the premises only	<input checked="" type="checkbox"/>
	Off the premises only	<input type="checkbox"/>
	Both	<input type="checkbox"/>

<p>Please state if the licensable activities will include the provision of relevant entertainment. If so, please state the times during the event period that you propose to provide relevant entertainment (including, but not limited to lap dancing and pole dancing). (Please see note 13)</p> <p>Fully nude striptease: From 03:00 on 29/11/18 to 05:00 on 01/12/18 (notice 1)</p>

4. Personal licence holders (Please read note 14)		
Do you currently hold a valid personal licence? (Please tick)	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
If "Yes" please provide the details of your personal licence below.		
Issuing licensing authority	The London Borough of Redbridge	

Licence number	P00539
Date of issue	24/11/2005
Any further relevant details	The notice giver is the director of the premises licence and SEV licence holder. The DPS will be present as normal.

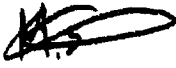
5. Previous temporary event notices you have given. (Please read note 15 and tick the boxes that apply to you)		
Have you previously given a temporary event notice in respect of any premises for events falling in the same calendar year as the event for which you are now giving this temporary event notice?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
If answering yes, please state the number of temporary event notices (including the number of late temporary event notices, if any) you have given for events in that same calendar year		
Have you already given a temporary event notice for the same premises in which the event period: a) ends 24 hours or less before; or b) begins 24 hours or less after the event period proposed in this notice?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>

6. Associates and business colleagues (Please read note 16 and tick the boxes that apply to you)		
Has any associate of yours given a temporary event notice for an event in the same calendar year as the event for which you are now giving a temporary event notice?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
If answering yes, please state the total number of temporary event notices (including the number of late temporary event notices, if any) your associate(s) have given for events in the same calendar year.		
Has any associate of yours already given a temporary event notice for the same premises in which the event period: a) ends 24 hours or less before; or b) begins 24 hours or less after the event period proposed in this notice?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Has any person with whom you are in business carrying on licensable activities given a temporary event notice for an event in the same calendar year as the event for which you are now giving a temporary event notice?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
If answering yes, please state the total number of temporary event notices (including the number of late temporary event notices, if any) your business colleague(s) have given for events in the same calendar year.		
Has any person with whom you are in business carrying on licensable activities already given a temporary event notice for the same premises in which the event period: a) ends 24 hours or less before; or b) begins 24 hours or less after the event period proposed in this notice?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>

Has any person with whom you are in business carrying on licensable activities already given a temporary event notice for the same premises in which the event period: a) ends 24 hours or less before; or b) begins 24 hours or less after the event period proposed in this notice?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
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7. Checks: (Please read note 17)	
Please tick the appropriate boxes, where applicable	
Sent at least one copy of this notice to the licensing authority for the area in which the premises are situated	<input checked="" type="checkbox"/>
Sent a copy of this notice to the chief officer of police for the area in which the premises are situated	<input checked="" type="checkbox"/>
Sent a copy of this notice to the local authority exercising environmental health functions for the area in which the premises are situated	<input checked="" type="checkbox"/>
If the premises are situated in one or more licensing authority areas, sent at least one copy of this notice to each additional licensing authority	<input type="checkbox"/>
If the premises are situated in one or more police areas, sent a copy of this notice to each additional chief officer of police	<input type="checkbox"/>
If the premises are situated in one or more local authority areas, sent a copy of this notice to each additional local authority exercising environmental health functions	<input type="checkbox"/>
Made or enclosed payment of the fee for the application	<input checked="" type="checkbox"/>
Signed the declaration in Section 9 below	<input checked="" type="checkbox"/>

8. Condition: (Please read note 18)
It is a condition of this temporary event notice that where the relevant licensable activities described in Section 3 above include the sale or supply of alcohol that all such supplies are made by or under the authority of the premises user.

9. Declarations: (Please read note 19)	
The information contained in this form is correct to the best of my knowledge and belief.	
I understand that it is an offence: (i) to knowingly or recklessly make a false statement in or in connection with this temporary event notice and that a person is liable on summary conviction for such an offence to a fine of any amount; and (ii) to permit an unauthorised licensable activity to be carried on at any place and that a person is liable on summary conviction for any such offence to a fine of any amount, or to imprisonment for a term not exceeding six months, or to both.	
Signature	
Date	23 October 2018
Name of Person signing	MR MANPAL SINGH CLAIR

For completion by the licensing authority

10. Acknowledgement: (Please read note 20)	
I acknowledge receipt of this temporary event notice.	
Signature	<i>B Hamida</i> On behalf of the licensing authority
Date	24/10/2018
Name of Officer signing	BUSKARA HAMIDA

Luke Elford

From: Luke Elford
Sent: 20 November 2018 13:05
To: 'manpal singh'
Subject: Vanity Bar - TENs for December [TLT-TLT.FID5595599]
Attachments: 18/13475/LITENP - 4 Carlisle Street; 18/13477/LITENP - 4 Carlisle Street;
18/13479/LITENP - 4 Carlisle Street; 18/13481/LITENP - 4 Carlisle Street

Hi Manu

I look forward to seeing you on Wednesday but in the meantime, please find attached the TENs for Vanity Bar for December.

What I suggest you do is:

1. Print 2 x copies of each email + attachments.
2. Display 1 x copy of the email + attachment alongside the premises licence at Vanity. You will need to change the notice on display as you move through the various notices.
3. Keep 1 x copy of all of the emails + attachments in the back office so that they can be produced to an officer if they visit.
4. Brief staff about the additional hours, the need to continue to promote the licensing objectives/comply with the SEV licence. My suggestion is that you observe the conditions of the premises licence/SEV licence as if they were in effect whilst operating under the notices.
5. If you receive queries from officers that you are unable to deal with at a local level then please ask them to contact me. My details are at the foot of this email or you can get me on the personal mobile which is 07876030113.

I trust that all makes sense. If you have any questions, please do not hesitate to contact me. Otherwise, have a super festive period at Vanity.

Kind regards

Luke Elford
Associate
for TLT LLP
D: +44 (0)333 006 1358
M: 07799 414692
[LinkedIn](#) | [Twitter](#) | [Aspiring Solicitors](#)
www.TLTsolicitors.com

