



Licensing Sub-Committee Report

Item No:	
Date:	25 April 2024
Licensing Ref No:	24/01118/LIPN - New Premises Licence
Title of Report:	Open Space At Trafalgar Square London
Report of:	Director of Public Protection and Licensing
Wards involved:	St James's
Policy context:	City of Westminster Statement of Licensing Policy
Financial summary:	None
Report Author:	James Hayes Principal Officer
Contact details	Telephone: 020 7641 6500 Email: jhayes2@westminster.gov.uk

1. Application

1-A Applicant and premises			
Application Type:	New Premises Licence, Licensing Act 2003		
Application received date:	28 February 2024		
Applicant:	Greater London Authority		
Premises:	Trafalgar Square		
Premises address:	Open Space At Trafalgar Square London WC2N 5DS	Ward:	St James's
		Cumulative Impact Area:	None
		Special Consideration Zone:	West End Buffer Zone
Premises description:	Trafalgar Square is a central London public open space.		
Premises licence history:	See Appendix 5		
Applicant submissions:	<p>The applicant has provided the following submissions:</p> <ul style="list-style-type: none"> Proposed Conditions Licensing Objectives Business and Resident Letter Mediation Letters <p>A copy of the documents can be seen at Appendix 2.</p> <p>There have been a number of other documents submitted by the applicant however, these documents are confidential and will not be made public.</p>		
Applicant amendments:	The applicant has removed the Provision of Adult Entertainment		

1-B Proposed licensable activities and hours							
Plays, films, live music, recorded music, performance of dance and anything of a similar description:				Indoors, outdoors or both			Both
Day:	Mon	Tues	Wed	Thur	Fri	Sat	Sun
Start:	09:00	09:00	09:00	09:00	09:00	09:00	09:00
End:	23:00	23:00	23:00	23:00	23:00	23:00	23:00
Seasonal variations/ Non-standard timings:			None				

Sale by retail of alcohol				On or off sales or both:			On
Day:	Mon	Tues	Wed	Thur	Fri	Sat	Sun
Start:	11:00	11:00	11:00	11:00	11:00	11:00	11:00
End:	22:00	22:00	22:00	22:00	22:00	22:00	22:00
Seasonal variations/ Non-standard timings:			None				

Hours premises are open to the public							
Day:	Mon	Tues	Wed	Thur	Fri	Sat	Sun
Start:	00:00	00:00	00:00	00:00	00:00	00:00	00:00
End:	00:00	00:00	00:00	00:00	00:00	00:00	00:00
Seasonal variations/ Non-standard timings:		None					
Adult Entertainment:		The applicant has removed the Provision of Adult Entertainment					

2. Representations

2-A Responsible Authorities	
Responsible Authority:	Environmental Health Consultation Team
Representative:	Sally Fabbricatore
Received:	27 th March 2024
<p>I refer to the application for a new Premises Licence for the above space. The space has previously been licensed under the following premises licence 17/04868/LIPDPS, this will be surrendered if this application is granted.</p> <p>The space is situated in the West End Buffer Special Consideration Zone.</p> <p>This representation is based on the Operating Schedule and the submitted plans, for the space titled with UEFA Champions Festival 2024, Trafalgar Square and dated 21/11/23.</p> <p>The applicant is seeking the following:</p> <ol style="list-style-type: none"> 1. To allow the Supply of Alcohol 'on' the premises Monday to Sunday 11:00-22:00 hours. 2. To allow the provision of Regulated Entertainment both 'indoors and outdoors' 09:00-23:00 hours. This includes Plays, Films, Live Music, Recorded Music, Performance of Dance and anything similar. <p>The main changes from the previous licence are to increase the licensed space and the number of occasions these activities can take place.</p> <p>I wish to make the following representation in relation to the above application:</p> <ol style="list-style-type: none"> 1. The Supply of Alcohol may cause an increase in Public Nuisance in the area and may impact on Public Safety. 2. The provision of Regulated Entertainment may cause an increase in Public Nuisance in the area and may impact on Public Safety. <p>The applicant has undertaken extensive discussion with Environmental Health throughout the pre-application process (23/09043/PREAPM). The applicant has proposed conditions within the Operating Schedule. Further discussions may still take place regarding the proposed use for licensable activities.</p> <p>Should you wish to discuss the matter further please do not hesitate to contact me.</p> <p>Following mediation, Environmental Health have proposed a number of conditions that have been agreed with the applicant. These can be seen at Appendix 5.</p>	

2-B Other Persons			
Name:		[REDACTED]	
Address and/or Residents Association:		[REDACTED]	
Status:	Valid	In support or objection:	OBJECTION
Received:	26 Mar 2024		

Dear Sirs

Licensing Act 2003

Representation by [REDACTED]

24/01118/LIPN / Open Space, Trafalgar Square / Great London Authority

We refer to the above application for a premises licence in respect of Open Space, Trafalgar Square.

This representation against the grant of the application is made on behalf of [REDACTED]
[REDACTED]

Our client's foremost concerns are the implication the application has on the licensing objectives, in particular the detrimental impact on crime and disorder and public nuisance likely to arise – indicative from previous events held in and around Trafalgar Square and under the ultimate control of the Greater London Authority and the threat to the unique Culture of London's West End.

Supporting Documentation

In considering the application our client has engaged independent licensing consultant [REDACTED] and we enclose with this representation his Executive Summary of the issues raised by the application.

Summary of Concerns

Whilst the applicant refers to a consultation process with local stakeholders, in reality this has been poor. Whilst our client has only now (19 March) had the opportunity to discuss the application and intentions of the GLA with its representatives; it is disappointing that this did not occur prior to the submission of the application. Our client would have welcomed from the outset a meaningful and comprehensive briefing from the applicant as to the intention of use of the application and how it will prevent crime and disorder and public nuisance historically resulting from licensed events at Trafalgar Square. Even at that meeting, many of the responses received lacked clarity and certainty

It is of particular concern that the application seeks to increase previous permissions and extend the

number of licensed events at Trafalgar Square, in addition to increasing the number of events that permit the sale of alcohol and the number of events that will require road closures.

This representation is not a blanket objection to the grant of an *appropriate* premises licence, where culture is enhanced; but this representation is made to ensure that any premises licence granted includes appropriate permissions and conditions to ensure that licensable activities provided under the licence are operated safely and in accordance with the

licensing objectives, particularly to reduce any cumulative impact arising from the sale of alcohol.

The premises are currently licensed under premises licence reference 17/04868/LIPDPS (“**the Existing Licence**”). The application itself acknowledges the increases sought as compared to the existing licence and it is these increases that cause significant concern to our client, with primary concern, given historic issues (see further below), to events involving alcohol and events involving sport and football.

Whilst proposed condition 1 states: “*The licensable activity authorised by this licence and provided at the premises shall be ancillary to the main functions of the space as a cultural/sightseeing attraction where cultural events are staged*”, this is open to interpretation and therefore insufficient. The Committee is encouraged to specify on the face of the licence that football and other sporting events in particular cannot be permitted to take place under this condition.

Historical Context and evidence

This is not the first application for a premises licence made by, or in conjunction with the Greater London Authority for this space. Previous events have taken place which have caused significant disruption and damage to both the Square itself and the buildings on its borders. The cost, both in time and money in rectifying damage from previous events has been significant. By way of example, the 2021 final of the UEFA European Football Championship resulted in six figures’ worth of damage to St Martin-in-the-Fields Church.

Concerns and Policy

Trafalgar Square is an enduring symbol - and vibrant platform - for British culture and artistic expression. It is home to both the National Gallery and National Portrait Gallery; the gateway to the West End and London's world-famous theatre district; and host to numerous events and gatherings that celebrate British culture and the arts in an inclusive and respectful manner.

Alcohol-fuelled football and some other sporting events are clearly not befitting of a platform of Trafalgar Square's status and significance. Aside from the tangible damage and vandalism we know events like this cause from recent experience, allowing more and more to go ahead risks undermining its status as an enduring symbol of British culture irreversibly.

West End Buffer Special Consideration Zone

Trafalgar Square is located in the **West End Buffer Special Consideration Zone**, to which Special Consideration Zone Policy SCZ1 applies. Policy para D43 notes (emphasis added): “*Applicants may need to consider **additional measures and mitigation** above that which would normally be put in place to **ensure that their operation will not negatively contribute to local issues**. The proposed measures to mitigate the risks to the licensing objectives may be more or less appropriate depending upon the style of operation applied for.*”

The West End Buffer Zone is approximately 0.66km² and, although occupying approximately 3.6% of the

borough’s footprint, it homes approximately 2,300 residential households and recorded rate of incidents per square kilometre nearly four times the borough average. The area itself is closely associated with dispersal, due to the large number of transport hubs, including national rail, tube stations and large numbers of night bus routes¹. Increasing the licensed area and the number of days upon which alcohol may be sold for up to 19,999 people by any reasonable consideration will inevitably result in instances of crime and disorder and public nuisance.

Key local issues in this area to be addressed by the Applicant are:

- Robberies.
- Theft.
- **Antisocial behaviour on and around public transport.**
- **Incidents relating to ambulance call outs at night to the locations of licensed premises for intoxication, injury related to intoxication and/or assault.**

Of these, ASB and ambulance call outs are an obvious concern. It would be helpful if both the Police and

the Applicant could address this policy and provide statistics as to the amount of relevant incidents when previous licences have been in force. These also replicate factors that have caused specific issues historically and need to be addressed by the applicant to prevent future disturbances to neighbouring buildings and those in the vicinity. Of particular concern are events where the licence is utilised by a third party, with limited on the day input from the applicant. Previous experience shown that the GLA have failed to ensure that third parties utilising its licence are managing and operating events robustly enough; ultimately GLA is the licence holder and the control of events is its responsibility.

Dispersal into the West End Cumulative Impact Area

The consequence of the West End Buffer SCZ location is the very close proximity to the cumulative impact area and the dispersal of up to 19,999 people into that area. The current designation of the West End CIA signposts, inter alia, (as per Policy paragraph D4) *“the cumulative effect of the concentration of late night and drink led premises and/or night cafés has led to serious problems of disorder and/or public nuisance affecting residents, visitors and other businesses.”* The result of the application will be the potential of 19,999 people dispersing into the CIA, particularly late at night.

Alcohol

A 100% increase in the number of days that alcohol can be sold (from 10 to 20) results in alcohol being sold in half of all licensable events at the premises. Consequently, this must activate consideration of Public Houses and Bars Policy PB1 and in any event, CIP1.

Policy paragraph F90 states: *“[...] premises that primarily serve alcohol, with or without the provision of any ancillary playing of music, can give rise to public nuisance for residents and other businesses, particularly where there is a concentration of such premises. This is principally due to noise from the premises and from patrons when they leave. Pubs and bars present opportunities for crime and they can also give rise to disorder.”*

The 2020 Cumulative Impact Assessment *“[...] identified that pubs and bars were significantly associated*

with a greater likelihood of reported crime, disorder and nuisance. Overall, for every additional licensed premises the number of reported crimes increased by 13%, noise complaints by 9% and disorder at all times of day by 6%. For every additional pub or bar noise complaints increased by 24%”.

The 100% increase in the permitted days to sell alcohol is therefore of significant concern to our client, particularly given the historic problems identified – in particular (but not limited to) football events. The [The Baroness Casey Review: An independent Review of events surrounding the UEFA Euro 2020 Final ‘Euro Sunday’ at Wembley](#) refers, in which a **GLA Official** was quoted²: ***“I work across a plethora of events, and never have I seen the consistent poor behaviour for that volume of time. It was criminal, it’s the best way of***

describing it - there was violence, there was disorder.”

Our client understands from the applicant that there are no football ‘screenings’ this year but any football or similar sporting event remains a concern. This needs to be recorded and conditioned. In short, it is our client’s view that either there should, as part of any licence granted, be clear and enforceable conditions that:

- a) There will be no ‘screenings’ of football events or fan zones; and *(in the event that the Committee is not minded to implement (a))*;
- b) No alcohol shall be sold at such or similar events.

Whilst the screening of football events cause *particular* concerns, all competitive sporting events –which include the sale of alcohol - are a cause for concern generally.

We note proposed condition 8 regarding customers bringing their own alcohol onto the Premises and encourage the Committee to make this an absolute restriction as follows:

“8. The Premises Licence Holder shall ensure that alcohol is not ~~allowed to be~~ brought onto the Premises by members of the public, ~~unless approved by the LOPSG”.~~

Cinemas, Cultural Venues, Live Sporting Premises and Outdoor Spaces Policy CCSOS1

Policy paragraph F19 acknowledges the impact of noise nuisance from outdoor events and confirms: *“The extent and frequency of these events in relation to the areas where the impact is felt will be considered in determining applications for premises licences for outdoor licensable activities, and the imposed conditions will reflect this.”*

Hours

Whilst predominantly within Core Hours (30 minutes beyond Core Hours on a Sunday), the previous disturbances caused indicate that the hours sought are too late for this particular location. The committee is urged to consider the impact of up to 19,999 departing from Trafalgar Square following the cessation of licensable activities at 23:00, without any form of structured dispersal plan or noise management plan.

Given the open space, even with temporary structures there is insufficient protection for neighbouring businesses and residents in terms of noise escape from both licensable activities and the dispersal of customers thereafter, particularly late at night.

Prevention of Public Nuisance

The application is the licensing of an open space. Whilst temporary structures can be installed (requiring a minor variation of plan where appropriate) the ability of any such temporary structure to successfully prevent significant noise escape and resulting nuisance is limited.

Policy paragraph F19 supports: *“Sound from outdoor events is not enclosed and carries across the city and therefore may cause widespread nuisance.”*

Street urination, litter, significant damage to property and anti-social behaviour are all are elements experienced as a result of events in Trafalgar Square, particularly resulting from events involving football and/or alcohol. This requires a significant clean-up operation at a

significant cost to third parties.

As ██████ notes in his Executive Summary³: *“Not only is there a risk of environmental degradation through increased noise, congestion, littering and potential public nuisance, there is also a risk of detrimental changes to public perceptions of the Square.”* Such changes to public perception erode at the cultural fabric of the Square, surely contrary to the cultural elements that the GLA wish to promote.

Such consequences must be considered by the Licensing Sub-Committee in its determination of the application.

Prevention of Crime and Disorder

The 2020 Cumulative Impact Assessment identified that incident rates associated with cumulative impact increased rapidly from 9pm⁴. Given the location of the premises on the edge of the West End Cumulative Impact Area and the capacity sought, the Committee is urged to consider reducing the hours for licensable activities and in particular for the sale of alcohol.

Anti-social behaviour and criminal damage have been experienced, alongside both the increased likelihood of customers as (i) the cause of crime and (ii) victims of crime, are readily foreseeable given historic issues experienced. All such elements negatively impact on the prevention of crime and disorder and are contrary to the licensing objectives. The applications proposes insufficient detail to adequately address these very real issues arising from licensable activities as applied for.

Public Safety

The intensification of licensed use at the Square and the attraction of large crowds that it will bring – not only in the Square itself, but on its periphery - will require co-ordinated management and policies to ensure the safety of both those visiting and those in the vicinity.

Additional road closures adds to the intensification of use and the scale of licensable activities utilised under the licence.

Prevention of Children from Harm

The increased provision for alcohol sales is a key concern. ██████ comments⁵: *“The sale of alcohol*

at 50% of all events in the Square is likely to be exclusionary to some family audiences and faith groups.

It places those children who do attend under increased exposure to alcohol-related harms, including

proxy sales, witnessing alcohol misuse and alcohol-related disorder by adults.”

Conclusion

Whilst our client appreciates an extension to previous authorisations can lead to an efficient and simplified process for the applicant in its onwards hiring out of Trafalgar Square for events in the open space (advertised for hire [online](#)), and its own events, this cannot be to the detriment of those in the vicinity nor the licensable objectives.

Proposed condition 1 requires licensable activities to be *“ancillary to the main functions of the space as a cultural/sightseeing attraction where cultural events are staged.”* Such activities must also be appropriate to the cultural significance of the Square.

Given the historic issues with events at Trafalgar Square and the detrimental impact on

the local community the Licensing Sub-Committee is encouraged to appropriately limit the permissions sought and to ensure that any grant includes a mechanism requiring the surrender of the Existing Licence. **For the benefit of doubt, our client has no objection to true cultural events, but is very concerned about the cultural impact of alcohol themed sporting and other events.**

We should be grateful if you would kindly acknowledge receipt of this representation and keep us informed on the progress of this application, including the date of Licensing Sub-Committee once scheduled and the deadline for submitting submissions for that hearing.

Encl – 

Premises Licence Application

Trafalgar Square, Public Open Spaces, WC2N 5DS

Executive Summary

London's West End has historically been a place of gathering and celebration. It contains the largest Evening and Night-Time Economy (ENTE) in Europe and one of the most significant globally. The area is also a magnet for protests and demonstrations, with open public spaces such as Trafalgar Square, in particular, being the focus of unofficial gatherings by crowds. These gatherings occur in addition to the series of annual events organised by event promoters on behalf of the GLA that form the impetus for this licence application. Trafalgar Square is one of London's iconic public spaces, a meeting place accessible to all of London's citizens, communities and national and international visitors. It is therefore a 'place' of some significance, not simply a 'space' within the urban fabric. The Square suitably requires high standards of maintenance and management as part of London's heritage, current appeal and

future legacy.

In response to their statutory obligations under the Licensing Act 2003, the City of Westminster has a long-standing Cumulative Impact Policy, the evidence for which was refreshed in 2023 through an internally-generated data analysis review. In Westminster's Statement of Licensing Policy 2021-26, Trafalgar Square lies within West End Zone 2 and within 3-minutes' walk of West End Zone 1; that part of Westminster with the highest density of licensed premises, also correlated in the partnership data with the most concentrated and intense negative cumulative impacts on the Licensing Objectives. In policy terms, Zone 2 is designated a 'Special Consideration Zone (SCZ) and referred to as the 'West End Buffer'. Applicants for Premises Licences within a SCZ "*should demonstrate that have taken account of the issues particular to the Zone in question*", as identified in the cumulative impact assessments, setting out how they propose to mitigate those issues within their

Operating Schedule.

This licence application seeks to increase the licensable area of events on Trafalgar Square to include the North Terrace in front of the National Gallery, the number of Major Events to increase by 50% from 10 to 15 per annum, and the number of events where alcohol can be served from 10 to 20 per annum (an increase of 100%); representing half of the total number of 40 annual events involving licensable entertainment. In their list of proposed Conditions, the Applicant is requesting a further 10 days per annum involving rehearsals for licensable events, bringing the annual total number days to 50 for event-related activity. The 15 Major Events will require road closures on some or all of the three surrounding roads.

Most advertised events in the GLA's 2024 schedule for Trafalgar Square, including St. Patrick's Day and Vaisakhi have had advertised closing times of 18:00, and none later than 19:00 (<https://www.london.gov.uk/events>). However, mirroring the current Premises Licence, the application seeks permission to serve alcohol up to 22:00 and provide regulated entertainment up to 23:00, with a closing time of up to midnight on any day of the week. The potential to stretch future events into the night-time hours therefore seems apparent.

Given the location there is clearly an interaction between events in the Square and the West End's core ENTE. Indeed, with up to 20 events per annum serving alcohol to up to 19,999 people on each occasion, the Square would itself form a new integral part of that ENTE, just outside of the West End Zone 1 CIA boundary. There are, therefore, certain to be a range of impacts that occur even though individual events may be thoroughly prepared and well-managed. These relate to the movement and dispersal of crowds into surrounding residential streets, thoroughfares, licensed premises, and transport services that are already under pressure from the sheer weight of human traffic. This is not simply my professional opinion. The Westminster Licensing Policy 2021-26 notes that:

"Cumulative impact in Zone 2 is likely significantly shaped not just by the premises that sit within it, but also dispersal from the acutely affected Zone 1 and hosting key transport hubs Charing Cross, Embankment...The area around Charing Cross station, towards Embankment demonstrated particularly persistent patterns of serious violent crime in the evening and night, as well as high rates of ambulance call outs to the location of licences" (p.168, Appendix 14, paras: 21-22).

Not only is there a risk of environmental degradation through increased noise, congestion, littering and potential public nuisance, there is also a risk of detrimental changes to public perceptions of the Square. A doubling in the number of events at which alcohol is served suggests the increased commercialisation of the Square through the sale of an age-restricted and generally regulated product. This changes the nature of the events whilst narrowing their potential appeal. The sale of alcohol at 50% of all events in the Square is likely to be exclusionary to some family audiences and faith groups. It places those children who do attend under increased exposure to alcohol-related harms, including proxy sales, witnessing alcohol misuse and alcohol-related disorder by adults. Increasing the availability of alcohol is also out of step with general lifestyle trends amongst young adults who are increasing choosing to be alcohol-free. Many actors within the hospitality and leisure sector are seeking to respond to such trends rather than to resist them. Certainly, crowd management becomes easier once alcohol consumption is reduced, or taken out of the equation, but conversely becomes more challenging when the availability of alcohol is increased. This number of licensable events, rehearsals and road closures and the hours proposed create some doubt and uncertainty as to the viability of the Applicant's proposed Condition 1, that even with the significant intensification of licensable activity they propose, licensed uses will remain 'ancillary' and the Square will retain its traditional 'core function' as a cultural/sightseeing attraction.

In conclusion, this application appears to stem from a desire to make events in Trafalgar Square more commercially profitable, without at the same time enhancing the provision of 'public goods', such as improving the general appearance, maintenance and supervision of the Square and its accessibility to all. The proposals would significantly intensify licensed uses, attracting large crowds on a regular basis. Using Trafalgar Square in this way risks enlarging the area of the West End identified in the City of Westminster's 2020 and 2023 Cumulative Impact Assessment exercises as experiencing the most intensive negative cumulative impacts. This is strong

evidence, and is foundational to Westminster's wider licensing policy framework. As a result, I do not see how this application supports the Licensing Objectives in Westminster.

██████████

██████████ is an independent licensing consultant. He has previously worked on four rounds of evidence gathering for cumulative impact assessment exercises in the West End, commissioned by the City of Westminster between 2003 and 2017 as part of their Statement of

Licensing Policy reviews and for the Greater London Authority in 2021 on a project to develop the London Night-Time Observatory shared data repository, as part of the Mayor of London's on-going Evening and Night-Time Economy strategy development.

Further submissions relating to this representation were received on 16 April 2024. These can be found at **Appendix 3**

Name:	[REDACTED]		
Address and/or Residents Association:	[REDACTED]		
Status:	Valid	In support or objection:	OBJECTION
Received:	22 Mar 2024		

Dear [REDACTED]

I am emailing following the [REDACTED], regarding the Champions League licensing applications.

The Champions League applications will impact [REDACTED] and we are concerned that suitable business engagement has not been done. While the letter was received, the requested business briefing session has not been arranged. Please do forward date for the Business Briefing so this can be shared with businesses.

We would like to request additional time for the engagement and for corresponding responses. Please could you confirm the response time can extended beyond 26th March with a new date will need to allowing for the Easter Break.

Name:	[REDACTED]		
Address and/or Residents Association:	[REDACTED]		
Status:	Valid	In support or objection:	OBJECTION
Received:	26 Mar 2024		

We write to object to the above applications made by the Greater London Authority for a new premises licence for Open Space at Trafalgar Square, London WC2N 2OS and the UEFA 2024 Champions League Fan Meeting Point, Victoria Embankment Gardens, Villiers Street, London WC2N 6ND.

We are [REDACTED]

Historically we have experienced regular road closures that severely impact our operation, the nature of our [REDACTED], so when arrival and departure experiences and service are impacted, it always presents a complication. Larger events close the entire road and is blocked for 2 days, being the most disruptive.

It goes without saying that [REDACTED], we pride ourselves [REDACTED]
[REDACTED]

We not only operate [REDACTED]
[REDACTED] which I believe is doing overall, a very good job in driving tourism to this area and supporting surrounding local businesses, and therefore these proposed activities are entirely counteractive [REDACTED].

We were therefore both surprised and aghast to hear about the GLA's application for both a football fan zone on Victoria Embankment and an intensification of their current activities on Trafalgar Square. [REDACTED] are sandwiched between the two.

Not only will the road closures severely effect our [REDACTED] but the noise, disturbance, disruption and nuisance from either or both events will have a substantial impact upon the quality [REDACTED].

It is not likely but inevitable that alcohol fuelled disturbance and anti-social behaviour will arise should either or both licences be granted with up to 50,000 intoxicated revellers wandering the streets and carrying out the sort of anti-social behaviour that drunken people do. We implore you to refuse both applications as without a doubt, they both either singularly or cumulatively undermine the promotion of all four licensing objectives, a rare thing where all four objectives are imperilled in such a disproportionate and grotesque manner as will negatively impact on our neighbouring area and business, namely for the following reasons:

- Crime & Disorder-e.g. crime, theft, vandalism and violence.
- Public Nuisance -e.g. noise, music, people leaving the area, shouting, traffic, rubbish, deliveries, all during anti-social hours.
- Public safety -e.g. overcrowding, risk of crowd trouble and narrowing of safe passageways for pedestrians.
- Protection of children.

For the main reasons set out above, we object to both applications.

Please acknowledge receipt of this representation and that I ask that we are kept updated as to the progress of this application, including the date set for the Licensing Sub-Committee.

Name:	[REDACTED]		
Address and/or Residents Association:	[REDACTED]		
Status:	Valid	In support or objection:	OBJECTION
Received:	20 Mar 2024		

If this application is approved it will give the Greater London Authority the right to do almost anything it likes seven days a week fifty two weeks a year without Westminster City Council having any say in the matter. Westminster City Council will have abnegated its responsibility for one of the most important areas of not only Westminster and London but the entire United Kingdom. Control of Trafalgar Square will pass into the hands of the anonymous bureaucracy that is the Greater London Authority leaving this national space open to the abuse and misuse by any partisan or activist group able to influence or control the GLA - and there is certainly

enough evidence that such group exist. I strongly object to the granting of this application and if it is granted it will be a cowardly avoidance of its responsibilities by Westminster City Council and as [REDACTED] I would find this shameful on the part of my representatives.

Name:	[REDACTED]		
Address and/or Residents Association:	[REDACTED]		
Status:	Valid	In support or objection:	OBJECTION
Received:	25 Mar 2024		

Dear Sirs

Representation by [REDACTED]

Application Ref: 24/01118/LIPN
Applicant: Great London Authority
Address: Open Space at Trafalgar Square, London WC2N 5DS

We write to object to the application made by the Greater London Authority for a new premises licence for Open Space at Trafalgar Square, London WC2N 5DS. We operate [REDACTED] which is in [REDACTED], just off Trafalgar Square. When events have occurred in the past in Trafalgar Square, congestion and noise is increased around [REDACTED] and in [REDACTED].

As a result of these experiences we are concerned that the application as applied for will negatively impact on the licensing objectives for the following reasons:

1. It will increase Public Nuisance - noise – music, people leaving – shouting, cars; rubbish; deliveries; set/down - anti-social hours
2. It could create further overcrowding, narrowing of safe passageway for pedestrians etc

For the reasons set out above, we object to the application.

Please acknowledge receipt of this representation and keep me updated as to the progress of this application, including the date set for the Licensing Sub-Committee.

Name:	[REDACTED]		
Address and/or Residents Association:	[REDACTED]		
Status:	Valid	In support or objection:	OBJECTION
Received:	25 Mar 2024		

As a key [REDACTED] and a [REDACTED] on Trafalgar Square we object to this licence application on the grounds that:

1. [REDACTED] following a large event on the square and we are not convinced that allowing additional events with larger capacities and with more opportunities for drinking will be in the best interests of [REDACTED] or other key landmark buildings on the square.
2. The noise from the events held on the square is extremely disruptive to [REDACTED]. [REDACTED] We have on occasion

had to cancel [REDACTED] when it has been known that large events are happening as they are so disruptive.

3. We object also on the grounds that the infrastructure and security required to manage such high volumes of people does not seem to be adequate. We experience antisocial behaviour around our site [REDACTED] and the general strain on our public facilities is onerous.

4. We feel that encouraging more events where alcohol is allowed and with significantly increased capacity, is irresponsible.

5. The impact of road closures required to service the large scale events is detrimental to our [REDACTED] and affects deliveries and services.

6. The impact on our [REDACTED] and [REDACTED] is negatively impacted due to high volumes of people in the immediate vicinity. With alcohol involved, this can often feel intimidating for people.

Overall we do not feel that adequate consideration has been given to the evidence that exists from our own experience in relation to the impact of large crowds when there is significant alcohol involved. We have strong concerns as a result and object to this application.

3. Policy & Guidance

The following policies within the City Of Westminster Statement of Licensing Policy apply:

Policy HRS1 applies

- A. Applications within the core hours set out below in this policy will generally be granted for the relevant premises uses, subject to not being contrary to other policies in the Statement of Licensing Policy.
- B. Applications for hours outside the core hours set out in Clause C will be considered on their merits, subject to other relevant policies, and with particular regard to the following:
1. The demonstration of compliance in the requirements of policies CD1, PS1, PN1 and CH1 associated with the likelihood of the effect of the grant of a licence for later or earlier hours on crime and disorder, public safety, public nuisance and the protection of children from harm.
 2. If the application is located within a Special Consideration Zone they have demonstrated that they have taken account of the issues identified in that area and provided adequate mitigation.
 3. Whether there is residential accommodation in the proximity of the premises that would likely be adversely affected by premises being open or carrying out operations at the hours proposed.
 4. The proposed hours of the licensable activities and when customers will be permitted to remain on the premises.
 5. The proposed hours when any music, including incidental music, will be played.
 6. The hours when customers will be allowed to take food or drink outside the premises or be within open areas which form part of the premises.
 7. The existing hours of licensable activities and the past operation of the premises (if any) and hours of licensable premises in the vicinity.
 8. Whether customers and staff have adequate access to public transport when arriving at and leaving the premises, especially at night.
 9. The capacity of the premises.
 10. The type of use, recognising that some venues are more likely to impact the licensing objectives than others; for example, pubs and bars are higher risk than theatres, cinemas and other cultural

and sporting venues due to the nature of the operation.

11. The Licensing Authority will take into account the active measures proposed for a 'winding down' period including arrangements for people to be collected from the premises to travel home safely.

12. Conditions on hours may be attached that require that the supply of alcohol for consumption on the premises ceases a suitable period of time before customers are required to leave the premises.

13. The council, acting as the Licensing Authority, may reduce hours if, after review, it is necessary to impose conditions specifying shorter hours in order to promote the licensing objectives.

14. Specific days for non-standard hours should be identified and justified as part of the application to allow responsible authorities and interested parties to evaluate the impact that these licensable activities may have, and to plan accordingly. The consideration of applications for later hours for Bank Holiday Mondays will take into account that later hours are generally granted for preceding Sundays and that the next day is a working day. Non-specific days are expected to be covered by Temporary Event Notices or variation applications.

C. For the purpose of Clauses A and B above, the Core Hours for applications for each premises use type as defined within this policy are:

1. **Casinos:** Up to 24 hours a day whilst casino gaming is permitted by a premises licence under the Gambling Act 2005.

2. **Cinemas, Cultural Venues and Live Sporting Premises:**

Monday to Sunday: 9am to 12am

3. **Hotels:** Monday to Thursday: 9am to 11.30pm. Friday and Saturday: 9am to 12am. Sunday: 9am to 10.30pm. Sundays immediately prior to a bank holiday: 9am to 12am. For the sale of alcohol to guests for consumption in hotel/guest rooms only: Anytime up to 24 hours.

4. **Off licences:** Monday to Saturday: 8am to 11pm. Sunday: 9am to 10.30pm.

5. **Outdoor Spaces:** Monday to Thursday: 9am to 11.30pm. Friday and Saturday: 9am to 12am. Sunday: 9am to 10.30pm. Sundays immediately prior to a bank holiday: 9am to 12am.

6. **Pubs and bars, Fast Food and Music and Dance venues:**

Monday to Thursday: 10am to 11.30pm. Friday and Saturday: 10am to 12am. Sunday: 9am to 10.30pm. Sundays immediately prior to a bank holiday: 12pm to 12am.

7. **Qualifying Clubs:** Monday to Thursday: 9am to 12am.. Friday and Saturday: 9am to 12am. Sunday: 9am to 10.30pm. Sundays immediately prior to a bank holiday: 9am to 12am.

8. **Restaurants:** Monday to Thursday: 9am to 11.30pm. Friday and Saturday: 9am to 12am. Sunday: 9am to 10.30pm. Sundays immediately prior to a bank holiday: 9am to 12am.

9. **Sexual Entertainment Venues and Sex Cinemas:** Monday to Thursday: 9am to 11.30pm. Friday and Saturday: 9am to 12am. Sunday: 9am to 10.30pm. Sundays immediately prior to a bank holiday: 9am to 12am.

D. Core hours are when customers are permitted to be on the premises and therefore the maximum opening hours permitted will be to the same start and terminal hours for each of the days where licensable activity is permitted.

	<p>E. For the purposes of this policy, 'premises uses' are defined within the relevant premises use policies within this statement.</p>
<p>Policy SCZ1 applies</p>	<p>A. In addition to meeting the other policies within this statement, applications within a designated Special Consideration Zone should demonstrate that they have taken account of the issues particular to the Zone, in question as identified within the 2020 Cumulative Impact Assessment and should set out any proposed mitigation measures in relation to those issues within their operating schedule.</p> <p>B. For the purpose of Clause A, the designated Special Consideration Zone for this application is:</p> <ul style="list-style-type: none"> • West End Buffer
<p>Policy CCSOS1 (A) applies</p>	<p>A. Applications outside the West End Cumulative Zones will generally be granted subject to:</p> <ol style="list-style-type: none"> 1. The application meeting the requirements of policies CD1, PS1, PN1 and CH1. 2. The hours for licensable activities are within the council's Core Hours Policy HRS1. 3. The operation of any delivery services for alcohol and/or late-night refreshment meeting the council's Ancillary Delivery of Alcohol and/or Late-Night Refreshment Policy DEL1. 4. The applicant has clearly demonstrated that the sale by retail of alcohol and late-night refreshment will be ancillary to the venue's primary function as a cinemas, cultural and live sporting venues and outdoor space. 5. The applicant has taken account of the Special Consideration Zone Policy SCZ1 if the premises are located within a designated area. 6. The application and operation of the venue meeting the definition for a cinema, cultural venue, live sporting premises or outdoor space as per Clause C <p>C. For the purposes of this policy the primary function of a cinema, cultural venue and live sporting premises is defined as:</p> <ol style="list-style-type: none"> 1. Cinema For the exhibition of feature or shorts films to an audience. 2. Cultural Venues <ol style="list-style-type: none"> a. Theatres: for the performance of plays, dramatic or other entertainment performances to an audience. b. Performance Venues: for a live performance in front of an audience which may include concert halls, comedy clubs or similar performances venues. c. Cultural Uses: for the exhibition of art (e.g. galleries), a museum, or historical building/site that is open for visitors to visit on payment. 3. Live sporting premises: the premises or the use to which the licence is intended for <ol style="list-style-type: none"> a. Live sporting events in the form of boxing and wrestling which takes place either inside or outside in the presence of an audience. b. Live sporting events that are licensable as they are being held within a building where the sport and audience are accommodated wholly or partly inside that building. c. Live sporting events that will take place outside a building, where the live sporting event is not a licensable activity but other licensable activities, are provided ancillary to that live sporting event. 4. Outdoor space The use of an outdoor space for licensable activities and other purposes as part of or ancillary to an event, small to large concerts, national significant musical concert or

	<p>events (e.g. Hyde Park), Mayoral or council organised events and seasonal activities (e.g. Christmas market or Winter Wonderland).</p> <p>5. For the purposes of C1 to C3 above:</p> <p>a. The sale of alcohol and late-night refreshment must be an ancillary function to the primary purpose of the venue.</p> <p>b. An audience may include either invited guests, members of that venue or associated organisation or members of the public who have purchased a ticket or not.</p>
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4. Equality Implications

The Council in its capacity as Licensing Authority has a duty to have regard to its public sector equality duty under section 149 of the Equality Act 2010. In summary, section 149 provides that a Public Authority must, in the exercise of its functions, have due regard to the need to:

- (a) eliminate discrimination harassment, victimisation and any other conduct that is prohibited by or under this Act;
- (b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it; and
- (c) foster good relations between persons who share a relevant protected characteristics and persons who do not share it.

Section 149 (7) of the Equality Act 2010 defines the relevant protected characteristics as age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation.

5. Appendices

Appendix 1	Premises plans
Appendix 2	Applicant supporting documents
Appendix 3	Representation supporting documents
Appendix 4	Premises history
Appendix 5	Proposed conditions
Appendix 6	Residential map and list of premises in the vicinity

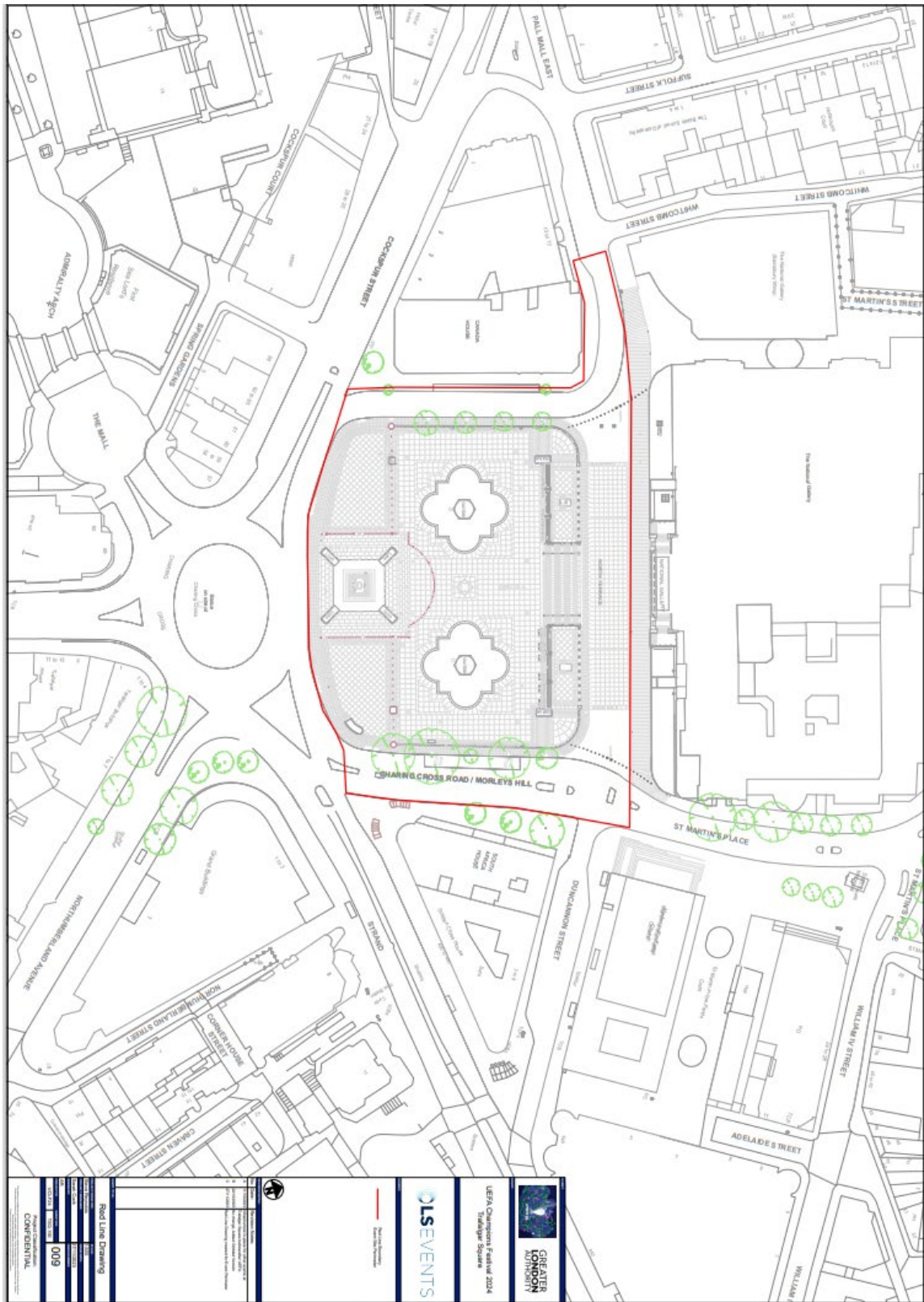
Report author:	James Hayes Principal Officer
Contact:	Telephone: 020 7641 6500 Email: jhayes2@westminster.gov.uk

If you have any queries about this report or wish to inspect one of the background papers please contact the report author.

Background Documents – Local Government (Access to Information) Act 1972

1	Licensing Act 2003	N/A
2	City of Westminster Statement of Licensing Policy	01 October 2021
3	Amended Guidance issued under section 182 of the Licensing Act 2003	December 2023
4	Cumulative Impact Assessment	04 December 2023
5	Environmental Health Representation	27 March 2024
6	Interested Party Representation (1)	26 March 2024
7	Interested Party Representation (2)	22 March 2024

8	Interested Party Representation (3)	26 March 2024
9	Interested Party Representation (4)	20 March 2024
10	Interested Party Representation (5)	25 March 2024
11	Interested Party Representation (6)	25 March 2024



Applicants Proposed Conditions

This document outlines the proposed conditions for the Trafalgar Square Application

No.	Proposed Condition
1	The licensable activity authorised by this licence and provided at the premises shall be ancillary to the main functions of the space as a cultural/sightseeing attraction where cultural events are staged.
2	<p>The number of Licensable Event days will not exceed 40 in a calendar year.</p> <p>Licensable events shall mean any event involving licensable activity organised and managed by the Licence Holder.</p> <p>Rehearsals for Licensable Events may take place in addition to the 40 days, on approval with the LOSPG.</p> <p>Rehearsals for Licensable Events may take place on a further 10 separate occasions.</p> <p>The Licence Holder will give advance notice to the members of the Trafalgar Square Neighbours Group of the 10 Rehearsal days, such notice to include the approximate times for the sound checks.</p> <p>Definitions: Rehearsals shall mean a practice run-through of a Licensable Event in advance of the advertised staging of the actual Licensable Event.</p> <p>15 Major Event Days may take place per calendar year.</p> <p>A major event means:</p> <ul style="list-style-type: none"> ● An event that requires a full road closure of any of the three surrounding roads: <ul style="list-style-type: none"> ○ Pall Mall East ○ Charing Cross Road/ Morley's Hill ○ or South Side Trafalgar Square (also known as Charing Cross) <p>and/ or any event determined to be a major event by the LOSPG Planning Group at which a member of the Environmental Health Consultation Team will be present.</p>
3	<p>Consultation with members of the Trafalgar Square Neighbours Group will be conducted quarterly per annum.</p> <p>Trafalgar Square Neighbours Group' is constituted by representatives invited from the National Gallery, National Portrait Gallery, Canada House, St-Martins-in-the- Fields, South African High Commission, Westminster City Council, the Metropolitan Police and any other premises within the vicinity, as appropriate.</p>
4	Onsite contact details for an appropriate person, at the Greater London Authority to be provided to the Trafalgar Square Neighbours Group for all licensable events.
5	Alcohol will only be made available for sale or supply on 20 days per calendar year. For each of the 20 days the Licensing Authority will require 10 working days notice and the Metropolitan Police will have the right of veto.
6	<p>When alcohol is to be provided, an alcohol management plan shall be provided to the LOSPG. The plan for approval shall include:</p> <p>(a) the exact location of the bars;</p> <p>(b) the area/s set aside for alcohol consumption;</p>

	<ul style="list-style-type: none"> (c) the type of alcohol to be sold; (d) any associated crowd management processes (e) proposed serveware by risk assessment; (f) the steps taken to uphold the Licensing Objectives (g) details of drinking water provisions (h) staff training
7	There shall be at least one personal licence holder on site during operational hours. Details of the personal licence holder (including name and contact number) shall be displayed in a prominent position on site.
8	The Premises Licence Holder shall ensure that alcohol is not allowed to be brought onto the Premises by members of the public, unless approved by the LOPSG.
9	The Premises Licence Holder shall ensure that no alcohol is allowed to be taken off the Premises by members of the public.
10	All events at which alcohol is sold shall be enclosed to prevent unauthorised access.
11	<p>When alcohol is sold at the event the following conditions shall apply to all bars, both for the public and in hospitality areas:</p> <ul style="list-style-type: none"> a) Unless otherwise agreed with LOSPG bars shall close at least 15 minutes before the event finish time. b) Bars shall not be permitted to run price promotions, happy hours or other promotions designed to encourage excessive drinking. c) Drinks shall not be served in glass vessels or containers. A risk assessment shall be conducted if cans are proposed and the suitability should be agreed with the LOSPG.
12	Food and non-intoxicating beverages, including drinking water, shall be available in all parts of the premises where alcohol is sold or supplied for consumption on the premises.
13	The use of this licence shall be agreed through the Licensing, Operational and Safety Planning Group (LOSPG) process and shall have had 'no objection' raised by the representatives on the LOSPG.
14	The Licensing, Operational and Safety Planning Group (LOPSG) shall be chaired by a representative of the Westminster City Council's City Promotions, Events and Filming team.
15	Membership of the Licensing, Operational and Safety Planning Group (LOSPG) shall normally consist of invited representatives of the designated event organiser, the Metropolitan Police Service, Officers of the Westminster City Council, the Environmental Health Consultation Team, London Ambulance Service, London Fire Brigade, Transport for London and any other appropriate and specialist advisor as required by the chairman of the LOSPG to achieve 'no objection' and to meet the objectives of the Licensing Act.
16	The Premises Licence Holder shall comply with all reasonable requirements of Westminster City Council, Westminster Police Licensing Team, Westminster City Council's Environmental Health Consultation Team, Westminster City Council's City Promotions, Events and Filming Team, the London Fire Brigade and the Metropolitan Police Service.
17	<p>Unless otherwise agreed with LOSPG, an Event Management Plan must be provided to the LOSPG for events where:</p> <ul style="list-style-type: none"> (i) an event with an enclosed public area within Trafalgar Square; (ii) determined to be a major event as detailed in this licence; (iii) for any other event where an Event Management Plan is required by the LOSPG

18	<p>Unless otherwise agreed with LOSPG, no later than 2 months prior to the event the Premises Licence holder must ensure the Event Management Plan is presented to the members of the LOSPG for their comments. If requested, the Event Management Plan shall include but not be limited to the following:-</p> <ol style="list-style-type: none"> a. Alcohol Management Plan (if appropriate) b. Access Management Plan; c. Adverse Weather Plan; d. Cancellation Procedure; e. CCTV Plan; f. Communications Plan; g. Child & Vulnerable Adults Policy; h. Crowd Management Plan (including Security and Stewarding Plan); i. Egress Management Plan; j. Emergency and Evacuation procedures; k. Event Control Statement of Intent; l. Event Medical Plan; m. Event Safety Plan including Risk Assessment; n. Fire Safety Management Plan; o. Ingress Management Plan; p. Lighting Plan; q. Noise Management Plan; r. Public Liability Insurance; s. Safeguarding Policy; Child & Vulnerable Adults Policy & Protection of Women & Girls; t. Sanitary Provisions u. Security and Crime Reduction Plan; including overnight security arrangements v. Site Plans (showing all permanent and temporary structures and all access and egress points); w. Sustainability Statement; x. Terms and Conditions of Entry; y. Trader Food Management Plan; z. Certificates from competent persons on Structures, Electrical Power Supply and Gas equipment (including LPG) aa. Transport Assessment; bb. Waste Management Plan. cc. Road Closure plan/Traffic Management Plan
19	So far as is reasonably practicable the Premises Licence Holder shall ensure that the event is run in accordance with the Event Management Plan.
20	If required by LOSPG, the Premises Licence Holder shall arrange an event debrief after each event day at a time agreed with LOSPG.
21	Flashing or particularly bright lights on or outside the premises shall not cause a nuisance to nearby properties (save insofar as they are necessary for the prevention of crime or public safety).
22	No fumes, steam or odours shall be emitted from the licensed area so as to cause a nuisance to any persons living or carrying on business in the area where the premises are situated.
23	A sufficient number of easily identifiable, readily accessible receptacles for refuse must be provided, including provisions for concessions. Arrangements must be made for regular collection. Public areas must be kept clear of refuse and other combustible waste prior to, and so far as is reasonably practicable, during the licensed event.
24	The licensee shall ensure that the highway and public spaces in the vicinity of the premises are kept free of litter from the premises to the satisfaction of the Westminster City Council. The highway in the vicinity of the premises shall be swept at regular intervals and at the close of business. All litter and sweepings collected and stored in the accordance with the approved refuse storage arrangements. Vicinity shall include the highway to each side of Trafalgar Square to a minimum distance of 50 metres.

25	<p>If requested by the LOSPG, a Noise Management Plan to promote the prevention of public nuisance shall be provided to Westminster City Council's Environmental Health Consultation Team for approval. The Noise Management Plan will be provided a minimum of 28 days prior to the event. The Noise Management Plan shall state the maximum permitted music noise level applicable at the nearest noise sensitive premises. Once approved in writing it shall be implemented by the Premises Licence Holder.</p>
26	<p>The Licensee will take all reasonable steps to ensure that amplified music will not cause a nuisance.</p>
27	<p>The following noise conditions shall apply to events with regulated entertainment:</p> <p>(a) A noise control consultant shall be appointed, who shall liaise between all parties including the Licence Holder, promoter, sound system supplier, sound engineer and the Environmental Health Consultation Team on all matters relating to noise control prior to the event.</p> <p>(b) For the purposes of monitoring music noise levels during the event and sound check, the noise control consultant shall contact the Environmental Health Consultation Team and agree noise sensitive locations which are to be used to monitor compliance with conditions (d) and (e).</p> <p>(c) If deemed necessary a noise propagation test shall be undertaken in consultation with representative(s) of the Environmental Health Consultation Team prior to each Major Event in order to set appropriate control limits at the sound mixer position. The sound system shall be configured and operated in a similar manner as intended for the event. The sound source used for the test shall be similar in character to the music likely to be produced during the event.</p> <p>(d) The stage shall only face north. The control limits set at the mixer position shall be adequate to ensure that the Music Noise Level shall not at 1 metre from the façade of any noise sensitive premises exceed 79 dB(A) over a 5-minute period throughout the duration of the event</p> <p>(e) Rehearsal and sound check times shall be limited between the hours of 08:00 and 18:00. Notification of the time(s) and duration of sound checks shall be provided to the Environmental Health Consultation Team at least 24 hours beforehand. There shall be no publicity of rehearsals. The total number of hours cumulatively for rehearsals will amount to no more than 50 hours in any calendar year. Rehearsals will be inaudible one metre from the nearest noise sensitive premises between 08:00 and 12:00 and from 14:00 to 17:00 Monday to Friday.</p> <p>(f) The promoter, system supplier and all individual sound engineers shall be informed of the sound control limits and that any instructions from the noise control consultant regarding noise levels shall be implemented.</p> <p>(g) A communications link should be provided to enable condition (f) above to be complied with and any numbers shall be made available to the Environmental Health Consultation Team prior to the event starting.</p> <p>(h) The appointed noise control consultant/or appointed person shall continuously monitor noise levels and advise the sound engineer accordingly to ensure that the noise limits are not exceeded. The Environmental Health Consultation Team shall have access to the results of the noise monitoring at all times. The Environmental Health Consultation Team shall have access and facilities to enable them to carry out their own monitoring.</p> <p>(i) The speakers must be located to the satisfaction of the Environmental Health Consultation Team.</p> <p>(j) Residential properties and the relevant amenity group(s) in the immediate vicinity of the Square will be contacted as soon as reasonable practicable prior to any Major Event/Music Event advising them of the times of the Event and any sound check or rehearsal times and giving them a telephone number to contact in the event that they have any complaints.</p> <p>(k) The report detailing the results of the monitoring shall be made available on request to the members of the LOSPG or Trafalgar Square Neighbours Group if requested.</p>

28	<p>There shall be no noise (audible above background noise) at the facade of the nearest building, from any construction or similar works in association with the set-up and breakdown of the site, outside the hours of:</p> <ul style="list-style-type: none"> ● 08:00-18:00 Monday to Friday ● 08:00- 13:00 Saturday ● No noisy work can be carried out on Sundays, bank holidays and public holidays. <p>Noisy work must not take place outside these hours unless otherwise agreed through an out of hours (OOH) approval (up to three consecutive days) or a Control of Pollution Act 1974 section 61 prior consent in special circumstances (for works longer than 3 consecutive days).</p>
29	<p>Any generators, refrigerators or other machinery running overnight will be silenced, screened or sited so they do not create noise (audible above background levels) at the facade of the nearest building</p>
30	<p>Notices shall be prominently displayed at all exits requesting patrons to respect the needs of local residents and businesses and leave the area quietly.</p>
31	<p>The Premises Licence Holder shall carry out the sanitary provision analysis using the event safety guide as the basis for determining the sanitation facilities required. The minimum number of facilities will be included in the Event Management Plan together with details of the maintenance and servicing of sanitary accommodation.</p>
32	<p>Any special effects or mechanical installations shall be arranged, operated and stored so as to minimise any risk to the safety of those using the premises. The following special effects will only be used on 10 days prior notice being given to the licensing authority where consent has not previously been given.</p> <ol style="list-style-type: none"> 1. dry ice and cryogenic fog 2. smoke machines and fog generators 3. pyrotechnics including fireworks 4. firearms 5. lasers 6. explosives and highly flammable substances. 7. real flame. 8. strobe lighting.
33	<p>No person shall give at the premises any exhibition, demonstration or performance of hypnotism, mesmerism or any similar act or process which produces or is intended to produce in any other person any form of induced sleep or trance in which susceptibility of the mind of that person to suggestion or direction is increased or intended to be increased. NOTE: (1) This rule does not apply to exhibitions given under the provisions of Section 2(1A) and 5 of the Hypnotism Act 1952.</p>
34	<p>The approved arrangements at the premises, including means of escape provisions, emergency warning equipment, the electrical installation and mechanical equipment, shall at all material times be maintained in good condition and full working order.</p>
35	<p>The means of escape provided for the premises shall be maintained unobstructed, free of trip hazards, be immediately available and clearly identified in accordance with the plans provided.</p>
36	<p>All emergency exit doors shall be available at all material times without the use of a key, code, card or similar means.</p>
37	<p>Emergency exits and entrances to the event area must be kept clear at all times and must be provided with clearly visible signage.</p>
38	<p>All parts of the licensed area intended to be used in the absence of adequate daylight and all essential safety signage shall be suitably illuminable. Details of the locations and level of illumination must be submitted to the LOSPG or their authorised representative.</p>
39	<p>The edges of the treads of steps and stairways shall be maintained so as to be conspicuous.</p>

40	Curtains and hangings shall be arranged so as not to obstruct emergency safety signs or emergency equipment.
41	All fabrics, curtains, drapes and similar features including materials used in finishing and furnishing shall be either non-combustible or be durably or inherently flame-retarded fabric. Any fabrics used in escape routes, entertainment areas, shall be non-combustible. All fabric, including curtains and drapes used on stage for tents and marquees, or plastic and weather sheeting, shall be inherently or durably flame retardant to the relevant British Standards. Certificates of compliance must be available upon request by an authorised officer of Westminster City Council, The London Fire Brigade.
42	Any moving flown equipment must contain a device or method whereby failure in the lifting system would not allow the load to fall. All hung scenery and equipment must be provided with a minimum of two securely fixed independent suspensions such that in the event of failure of one suspension the load shall be safely sustained.
43	The certificates listed below shall be submitted to the licensing authority upon written request: <ul style="list-style-type: none"> • Any permanent or temporary emergency lighting battery or system • Any permanent or temporary electrical installation • Any permanent or temporary emergency warning system
44	Electrical generators, where used, must be: <ul style="list-style-type: none"> • Suitably located clear of buildings, marquees and structures, and free from flammable materials; • Enclosed to prevent unauthorised access; • Able to provide power for the duration of the event; • Backed up electrical generators are to be provided to power essential communications, lighting and safety systems in the event of primary generator failure.
45	Details of all marquees, tented structures and temporary structures should be provided including emergency exits and signage, fire warning and fire fighting equipment.
46	Full structural design details and calculations of all and any structures to be erected within the licensed area must be submitted to the Westminster City Council Building Control. A certificate from a competent person or engineer that a completed structure has been erected in accordance with the structural drawings and design specification must be available for inspection prior to a relevant structure being used during the licensed event.
47	The Premises Licence Holder must ensure that competent persons are employed to assess the electrical requirements at the event and the compatibility of the electricity supply with the equipment to be used. Appropriate safety devices (such as 30mA Residual Current Devices at Source) must be used for electrical apparatus, particularly for any electrical equipment exposed to adverse conditions or electrical equipment to be used in association with hand held devices (e.g. microphones). The competent person must make a certificate of inspection of the electrical installation available for inspection.
48	All spare fuel, including LPG, must be kept and stored safely in accordance with relevant Health and Safety legislation and suitable safety signage and fire fighting equipment provided. No non-emergency vehicles shall be operated within the premises during an event.
49	No non-emergency vehicles shall be operated within the premises during an event.
50	When alcohol is sold at the Premises Licence Holder shall install a comprehensive CCTV system on site in accordance with the CCTV Plan agreed with LOSPG and in particular with the MPS. The CCTV system shall continually record whilst the premises is open for licensable activities and during all times when customers remain on the premises. A staff member from the premises who

	<p>is conversant with the operation of the CCTV system shall be on the premises at all times when the premises is open to the public. This staff member must be able to provide a Police or authorised Westminster City Council officer copies of recent CCTV images or data with the minimum of delay when requested. All recordings shall be stored for a minimum period of 31 days with date and time stamping, and recordings should be made available upon the request of Police or authorised officer as soon as reasonable practicable throughout the entire 31 day period.</p>
51	<p>The bars shall close immediately on the direction of the senior police officer engaged on the event. In the event of disorder or injury to any person due to the presence of plastic bottles or cans, the senior police officer present can direct the immediate cessation of alcohol served in plastic bottles or cans whilst the risk is still present.</p>
52	<p>The Premises Licence Holder shall produce a security stewarding plan which will detail the qualification, training and deployment of SIA security and stewards. The positioning of staff will be based on a risk assessment process.</p>
53	<p>Adequate stewarding within the licensed area must be provided at all times during the licensed event.</p>
54	<p>All security staff will be identifiable in uniform and will display their name badges by way of a reflective armband or lanyard.</p>
55	<p>Twenty-four hour Security Industry Authority (SIA) approved security to be provided on site from the night when equipment first arrives until removed.</p>
56	<p>Unless police approval is given otherwise, stewards shall monitor all entry and egress points throughout the day of an event. Such monitoring shall include:</p> <p>(a) (i) Persons entering the premises shall be told by stewards and security to decant all alcohol into recyclable cups supplied. Signage at all points of entry shall re-enforce this message of not bringing alcohol onto the premises unless it has been decanted. Persons refusing to decant alcohol shall not be admitted to the premises.</p> <p>(ii) Persons attempting to leave the premises with alcohol shall be advised by stewards and security that they are about to enter a designated "no drinking zone", and should not leave the premises with alcohol. Signage at all points of exit shall re-enforce this message of not taking alcohol from the premises. Those refusing to comply shall be warned that police officers might intervene to prevent them breaking the law.</p> <p>(b) The numbers of stewards at each entry and egress point shall be continuously reassessed throughout the day in consultation with the relevant senior police officer on duty for the event or relevant area of the event.</p> <p>(c) All stewards shall wear readily identifiable tabards.</p>
57	<p>An incident log shall be kept at the premises on event days whilst the premises is open, and made available on request to an authorised officer of the Westminster City Council or the Police. It must be completed within 24 hours of the incident and will record the following:</p> <ol style="list-style-type: none"> 1. all crimes reported to the venue 2. all ejections of patrons 3. any complaints received concerning crime and disorder 4. any incidents of disorder 5. all seizures of drugs or offensive weapons 6. any refusal of the sale of alcohol 7. any formal visit by a relevant authority or emergency service.
58	<p>A record shall be kept detailing all refused sales of alcohol. The record should include the date and time of the refused sale and the name of the member of staff who refused the sale. The record shall be available for inspection at the premises by the police or an authorised officer of the Westminster City Council at all times whilst the premises is open.</p>

59	A Challenge 25 proof of age scheme shall be operated at the premises where the only acceptable forms of identification are recognised photographic identification cards, such as a driving licence, passport or proof of age card with the PASS Hologram.
60	Posters will be displayed on site in the bar area and point of sale, which refer to the challenge 25 policy and to advise that suitable proof of age will be required for the purposes of the supply of alcohol.
61	Age restricted films shall not be shown in the presence of children.
62	The Safeguarding Policy will include details of the welfare provision for the support of children and vulnerable adults and protection of Women and Girls. All welfare staff will be appropriately trained and certified.
63	The Premises Licence Holder shall produce and implement a child or vulnerable persons policy which will include provision for children or vulnerable persons found or reported missing. This will be included in the safeguarding policy.
64	The Premises Licence Holder shall appoint one person as responsible for safeguarding on site to coordinate safeguarding measures.
65	A welfare area will be provided to coordinate all welfare safeguarding activities.
66	If required by LOSPG, external security teams will patrol the event perimeter and a security response team will operate in the immediate area around the site.

Licensing Objectives

Describe the steps you intend to take to promote the four licensing objectives:

a) General – all four licensing objectives (b,c,d,e)

List here steps you will take to promote all four licensing objectives together.

GENERAL OVERVIEW

Promotion of the licensing objectives laid out in the Licensing Act 2003 is central to the plans for the Events. The applicant and their appointed contractors will engage with the Licensing Operations Safety Planning Group (LOSPG) to ensure that the planning and operation of the event conforms with best practice for live outdoor events.

We believe that the framework for live events provided by the Licensing Act and statutory guidance offers a realistic and valuable tool for ensuring the safety and welfare of all involved. The track record of the applicants' operations in Trafalgar Square and elsewhere indicate that they will be well-managed and safe events.

COMPLY WITH POLICY

The Applicant has reviewed the Licensing Policies requiring mitigation of ASB and the promotion of the Licensing Objectives and have taken these into account in the proposed conditions and will provide mitigation measures in the relevant Plans within the EMOP.

UPDATE SUMMARY

The applicant has reviewed the licence conditions and updated these in consultation with Westminster City Council to be in line with their current model conditions. A pre-application meeting has taken place to conduct consultation with the licensing authority and the responsible authorities

Consultation has taken place with the Neighbours Group as well as local residents via a letter drop. A copy of this letter has been supplied as a supporting document to this application. If granted there will be a programme of consultation which will take place with local businesses, residents and neighbours each year.

The total number of licensable events applied for remains at 40 per calendar year.

The maximum capacity will remain the same at 19,999.

The licensable area of the site has increased to include the North Terrace.

The number of Major Event dates has increased from 10 to 15.

The number of events where alcohol can be served has increased to 10 to 20.

LOSPG PLANNING GROUP AND CONSULTATION

An event LOSPG will be established for events taking place under this licence where required. The applicant undertakes to abide by the recommendations of this group.

The applicant will consult with members of the Trafalgar Square Neighbours Group quarterly per annum. Residential properties and

relevant amenity groups will be contacted as soon as reasonable practicable prior to any event advising them of key operational details such as sound checks, and road closure timings.

The applicant will also hold LOSPG Sub-Group meetings for more detailed planning feedback.

Outputs from these and other meetings will continue to shape the Event Management and Operating Plan (EMOP), a document that describes how the event will operate safely and to the high standards expected by all concerned.

An LOSPG debrief meeting will be held after the final event.

CAPACITY

The maximum capacity for the events is 19,999.

THE LICENSED AREA

A site plan to illustrate the licenseable area is included in this application.

EVENT MANAGEMENT AND OPERATING PLAN

An Event Management and Operating Plan (EMOP) will be provided where required by the LOSPG providing details within individual Management Plans for the safe design and operation of Events. This Plan shall be submitted within an agreed timetable and be subject to the scrutiny of the LOSPG.

ANNUAL NOTIFICATIONS

The applicant will present a draft EMOP to the LOSPG, no later than 2 months prior to the first event date.

PROPOSED CONDITIONS

The applicant's proposed conditions are attached to this application.

B) The prevention of crime and disorder

In conjunction with the Metropolitan Police and the LOSPG for each event where required the applicant will produce:

- CCTV Plan;
- Alcohol Management Plan (if appropriate)
- Crowd Management Plan (including Security and Stewarding Plan);
- Egress Management Plan;
- Event Control Statement of Intent;
- Ingress Management Plan;
- Security and Crime Reduction Plan; including overnight security arrangements
- Lighting Plan.

The detailed Crowd Management Plan that will be drawn up by the appointed security contractor, will specify numbers of staff and roles, where SIA qualified staff are required and emergency procedures (e.g. evacuation of the site). This plan will integrate with the EMOP for the event and will be produced in conjunction with the Metropolitan Police, the designated security contractor and the applicant.

All activity within the licensed area will be appropriately managed with SIA security and stewards. A pre-agreed level of professional stewarding and SIA security personnel will have a designated responsibility to maintain a safe environment for members of the public attending the event.

All temporary structures will be lit internally, and adequate temporary public lighting will be present on the site when necessary.

The applicant will ensure that staff are trained to recognise intoxication and refuse service to customers who have consumed excessive alcohol and trained to handle potential troublemakers and diffuse difficult situations.

We will encourage vigilance among staff to supervise customers in all parts of the premises and will employ sufficient staff to keep down the number of people waiting to be served in any bar areas.

Event SIA security and stewarding will be vigilant and identify suspicious behaviour and take appropriate action to assist in the prevention of theft and robbery and the prevention of crime and disorder within the premises.

The applicant will work with the Metropolitan Police to support development and implementation of an appropriate policing plan for the event.

Challenge 25 will be in operation. Anyone who appears to be under 25 must produce ID or a proof of age card to acquire or consume alcohol on the premises.

Where required the applicant will use screening on the entry points to the event to exercise the right to refuse entry to any unauthorised or disorderly person.

C) Public Safety

All event activity within the licensed premises will be controlled with specific reference to the capacity of the venue, the nature of the cultural content and in compliance with the standards for the provision of services as outlined by HSG 195 The Event Safety Guide (commonly known as the Purple Guide).

The applicant will utilise the application and planning stage of the event management process to ensure the safety of the public, contractors and artists, and to minimise hazards and prevent accidents. This will be achieved through the consultation process with the LOSPG and through the submission of documentary proof of competency to include proof of Public Liability Insurance and the provision of an event risk assessment.

All events activity will make provision for the management of access and egress to the square considering the maximum specified capacity at any one time.

Provision will be made to allow communication of emergency procedures and issues relating to the health, safety and welfare of people within the venue. Where appropriate this will be done through signage, via public address systems and by event staff.

The contingency arrangement for emergency evacuation is in place and will be implemented should the need arise. This is detailed in the Event Management and Operating Plan (EMOP).

First Aid provision for events will be in accordance with the Event Safety Guide and will form part of the EMOP.

All event contractors will comply with all relevant health and safety legislation and follow the control measures documented in their own risk assessments and method statements and will be responsible for ensuring safe systems of work.

Structural calculations for temporary structures will be made available as required for scrutiny. As part of the Event Management Plan a Wind Management Plan or risk assessment detailing wind speeds at which certain actions must be taken will be drawn up and implemented.

The applicant will produce an Adverse Weather Plan in conjunction with the LOSPG where required.

All temporary structures will be lit internally, and adequate temporary public lighting will be present on the site when necessary.

The applicant will carry out an analysis of sanitary provision needs for the event using The Event Safety Guide as a basis for determining what provision is required. Suitable and sufficient sanitary provision shall then be provided.

No glass containers will be permitted in the general public areas.

Challenge 25 will be in operation. Anyone who appears to be under 25 must produce ID or a proof of age card to acquire or consume alcohol on the premises.

D) the prevention of public nuisance

The applicant is mindful that events of this scale has the potential to create a public nuisance if inappropriately managed. It is therefore our intention to engage with the LOSPG and local residents to ensure that the operation of the event is undertaken in such a way as to minimise this.

The location of the event is Trafalgar Square, a central London historic location with a wide variety of users and stakeholders. It is surrounded by business and resident accommodation.

A concern for local residents and stakeholders is the generation of music noise by the event. The applicant has engaged with representatives of Westminster City Council Environmental Protection team and have agreed both an appropriate site design and permissible music noise levels (MNL) at the nearest building facades surrounding the event site. Noise created by generators and other plant and equipment will also be monitored and controlled.

The applicant undertakes to comply with the MNL given by Environmental Protection and have engaged the services of specialist acoustic consultants who have developed a Sound Management Plan for the event. It is the responsibility of the specialist acoustic consultants to monitor levels at the agreed locations, to act as required to remain within the agreed levels and to provide documentary proof after the event of our compliance.

The applicant agrees to comply with such noise curfews as are reasonably required by the Westminster City Councils Environmental Protection for operations during the park during build up and break down of the event.

Consultation with the Neighbours Group and local community and friends of Trafalgar Square has already taken place to gain feedback and allow the applicant to tailor plans to the specific concerns of the local community. Consultation will continue with community and business engagement each year.

It is proposed that additional stewarding and sanitation externally to the event will be in place in result of consultation with the local community. Additional stewarding and sanitation will be implemented for the higher capacity days in accordance with the risk assessment.

The applicant has consulted with the environmental protection team and a set of proposed noise conditions are attached to this application. The control limits set at the mixer position shall be adequate to ensure that the Music Noise Level shall not at 1 metre from the façade of any noise sensitive premises exceed 79 dB(A) over a 5-minute period throughout the duration of the event

The applicant is pleased to have the opportunity to use the facilities of Trafalgar Square and are mindful of their responsibility to maintain the fabric of the area. They undertake to provide cleaning services to remove litter and waste, to apply appropriate protocols to control spillage or other contamination, and to respect the natural and built environment. This will include external areas outside of the square, in

	<p>consultation with the Local Authority and Events Team and other agencies.</p> <p>Where required the applicant, in conjunction with the Metropolitan Police and the appointed security and stewarding contractor will put in place such plans as are necessary to control the ingress and egress of the large volume of guests attending the event. Furthermore, they will develop a plan to prevent and respond to anti-social behaviour caused by visitors to the event, and undertake to commit the required resources to implement it.</p> <p>Where required comprehensive transport and traffic management plan, to include production, artists and guest traffic will be developed and enforced to ensure minimal disruption to both local residents and other traffic.</p> <p>Members of the public will be prevented from removing alcohol from the event site by stewards at the event exit points. Bins will be placed at these locations to allow the disposal and recycling of any containers.</p>
<p>E) The protection of children from harm</p>	<p>Age restrictions may apply to event days which will be agreed in advance with LOSPG and will be contained in the EMOP.</p> <p>The applicant will implement a Child and Vulnerable Persons Policy which will include provisions if a child or vulnerable person is found or reported missing. This will include liaison at the planning stages with the Police to ensure the correct questions are asked at the outset by event staff should details of the missing person need to be escalated to the Police.</p> <p>One person will be identified as being responsible for Safeguarding on site. This person will ensure that safeguarding measures are coordinated across Event Management & Operating Plan and appendices.</p> <p>A welfare area will be set up to coordinate all welfare, safeguarding and information activities.</p> <p>Additional children's toilets and changing facilities shall be added to the event site when appropriate, in addition to the minimum guidance provided in the Event Health, Safety and Welfare Guide (Purple Guide).</p> <p>The organisers are committed to the responsible and legal sale of alcohol and do not tolerate provision of alcohol to children. The contracted bar operator is required to make an undertaking to enforce the Challenge 25 policy for all sales of alcohol, requiring approved photographic ID. The security and event team will maintain vigilance for instances whereby alcohol is purchased by adults for supply to children, and this criminal activity will be considered grounds for ejection. The promoters will facilitate and support licensing inspections if appropriate.</p>

GREATER LONDON AUTHORITY

GLA REFERENCE: TSQ Premises License 1

DATE 8.3.24

RE: Trafalgar Square Premises License Application

Dear whom it may concern,

As an important stakeholder in the Trafalgar Square area, we wanted to inform you of our upcoming licence application for events at Trafalgar Square in 2024. The application will be submitted soon, and this letter forms part of an ongoing consultation that will take place with yourselves. This application will be available to view here: www.westminster.gov.uk/Licensing

In previous years, the total number of events selling alcohol and requiring road closures have exceeded the number of events included in the current GLA Premises Licence. In these occasions additional premises licences were applied for to increase the number of event types for the planned events. The GLA wishes to apply for a new licence with an updated number of event types to be in line with recent years programming of the square and therefore no longer apply for additional licence applications for their planned events. These events will include recurring events familiar to Trafalgar Square such as St Patrick's Day, Luna New Year, St Georges Day, Vaisakhi Pride, and Diwali, as well as hosting culturally/nationally significant ad-hoc/one-off celebrations.

The summary of the application is as follows.

- The licensable area has been increased to include the North Terrace, Pall Mall East, Charing Cross Road/ Morley's Hill.
- The event timings and total number of events remain the same (up to 40).
- The maximum number of events where road closures may be required on Pall Mall East Charing Cross Road/ Morley's Hill or South Side Trafalgar Square (also known as Charing Cross) has increased from 10 to 15. The closure of roads is still subject to Landlord consent.
- The maximum number of events where alcohol is served has increased from 10 to 20.
- The Music Noise Levels for the events has been standardised for events with amplified music to allow for a more harmonious environment for the local area, more details of this are available on request.
- Premises Licence Conditions have been reviewed with Westminster City Council to put these in line with the council's current model conditions.

Business and Residents Hotline

A dedicated Business and Residents hotline will be in operation over the event construction, show day and de-rig period. This number will be circulated nearer to the event.

Further Information:

We will write to you again in due course to provide further details as well as our Business and Residents hotline number. In the meantime, if you have further questions relating to the event you can contact the events Business & Residents Consultation team by email at uclf.community@ls.uk and they will be happy to help.

REFERENCE: Trafalgar Square Premises Licence Application
[REDACTED]

DATE: Thursday 11 April 2024

Dear [REDACTED],

We are contacting you from LS Events, the Event Management Company contracted on behalf of the Greater London Authority (GLA) in response to your representation against our proposed Premises Licence for Trafalgar Square.

Thank you for your engagement in the matter concerning our premises licence application. Your input is valuable to us, and we are committed to addressing the concerns you have.

We would like to address your specific concerns as follows:-

Consultation

Extensive consultation has taken place with Westminster City Council and the Met Police prior to submission to the application and the conditions we propose are vastly more comprehensive than those on the existing premises licence.

Events and Capacities

The GLA have an existing licence for events in Trafalgar Square. The total number of licensable events proposed in the licence applications remains at 40 (in line with the previous licence). The capacity of the licence remains at a maximum of 19,999 (in line with the previous licence). Each event will be risk assessed and specific event management plans are scrutinised by LOSPG (Licensing Operations Safety Planning Group) to ensure that risks are mitigated.

Security and Stewarding

We understand the concern surrounding damage to the property after the Mens Euros. The Champions Festival on Trafalgar Square will be very different to that event in that we will not be screening the match. We should also acknowledge that Mens Euros was extremely close to the end of covid 19 restrictions which did see general crowd behaviour change. We are putting all mitigations in place where possible with stewarding and infrastructure, as approved by the Metropolitan Police and LOSPG, to ensure that this protects businesses and residents.

Sound

A sound management plan will be in place, approved by the LOSPG to manage the sound and a maximum music noise level is fixed for the duration of all events. Surrounding properties and the relevant amenity groups in the immediate vicinity of the Square will be contacted as soon as reasonably practicable prior to the events advising them of the dates and times of the Event and any sound check or rehearsal times.

Complaints and information line

A resident phonenumber, consisting of two direct numbers are always provided in advance to those on the neighbours mailing list for large events on the Square. The Heritage Wardens, onsite 24/7 and a GLA Officer present on the Square. Any issues can be communicated via these contacts who can feedback complaints to the event production team. Heritage Wardens also monitor noise levels throughout the events.

Event Types

Whilst the number of events serving alcohol is proposed to increase from 10 to 20 in the new application, the actual number of events where alcohol is being sold will not significantly differ from previous years.

2021: 14
2022: 13
2023: 10
2023: 14

Previously additional licences have been applied for events requiring the sale of alcohol in addition to the 10 days outlined in the existing licence.

Whilst the number of events requiring road closures is proposed to increase from 10 to 15 in the new application, the actual number of events where roads will close will not differ significantly from previous years

2021: 11
2022: 7
2023: 6
2024: 12

Whilst the premises licence allows for a total number of Major Events requiring road closures, the event organiser must obtain landlord consent from the appropriate authority (e.g. Westminster Council or TfL). Therefore consultation must take place with these agencies for each road closure to be approved.

The number of event types applied for provides some flexibility for short notice celebratory events in addition to the programmed events. Trafalgar Square has increasingly become a venue for celebration for London and the UK both in terms of sporting achievements and cultural festivals. Increasing the number of event types gives the flexibility to host these culturally/nationally significant celebrations, such as Royal Jubilees and Victory Parades including Olympics, Men's and Women's National team success in sport.

Alcohol

Licence conditions have been included into the application whereby the Metropolitan Police may veto the sale of alcohol. Alcohol Management Plans must be approved by the Licensing Operations Safety Planning Group (LOSPG), and necessary health and safety, security, and waste management controls must be in place. Event Organisers therefore must demonstrate they can safely manage the sale of alcohol with minimum disruption and this must be approved by the LOSPG and Metropolitan Police in order for them to use one of the 20 days outlined in the licence application.

Consultation under the proposed licence

Consultation with members of the Trafalgar Square Neighbours Group will be conducted quarterly per annum.

Trafalgar Square Neighbours Group' is constituted by representatives invited from the National Gallery, National Portrait Gallery, Canada House, St-Martins-in-the-Fields, South African High Commission, Westminster City Council, the Metropolitan Police and any other premises within the vicinity, as appropriate.

This platform provides a space for the GLA and key stakeholders to discuss upcoming events and the relevant mitigations needed to ensure these can take place with minimal impact.

We hope the above information provides you with some assurance that we can safely manage the events as proposed in our premises licence application.

We would be more than happy to meet to discuss this if you would like further information, and to assure you that your representation will be fed into the planning process for future events.

Please contact us via uclf.community@ls.uk

Look forward to hearing from you,


LS Events

REFERENCE: Trafalgar Square Premises Licence Application

DATE: Thursday 11 April 2024

Dear [REDACTED]

We are contacting you from LS Events, the Event Management Company contracted on behalf of the Greater London Authority (GLA) in response to your representation against our proposed Premises Licence for Trafalgar Square.

Thank you for your engagement in the matter concerning our premises licence application. Your input is valuable to us, and we are committed to addressing the concerns you have.

We would like to address your specific concerns as follows:-

Extensive consultation has taken place with Westminster City Council and the Met Police prior to submission to the application and the conditions we propose are vastly more comprehensive than those on the existing premises licence.

The GLA have an existing licence for events in Trafalgar Square. The total number of licensable events proposed in the licence application remains at 40 (in line with the previous licence). The capacity of the licence remains at a maximum of 19,999 (in line with the previous licence).

Events operating under the licence must supply an Event Management Plan which is approved by the LOSPG (Licensing Operations Safety Planning Group) with representatives such as Westminster City Council, Metropolitan Police, London Fire Brigade and other responsible authorities. This event management plan contains plans such as Event Safety Plan and Risk Assessment, Crowd Management Plans, Ingress and Egress Management Plans, Noise Management Plans, Waste Management Plans plus many more. These plans are scrutinised by the LOSPG group against the risk assessment of the individual events.

Sound Management

A sound management plan will be in place, approved by the LOSPG to manage the sound and a maximum music noise level is fixed for the duration of all events. Surrounding properties and the relevant amenity groups in the immediate vicinity of the Square will be contacted as soon as reasonably practicable prior to the events advising them of the dates and times of the Event and any sound check or rehearsal times.

Stewarding and Security

As part of the planning with the LOSPG group, a Security and Crime Reduction Plan is created for each event which assesses the specific risks for the event and puts in place mitigations for types of Anti-Social Behaviour. Fencing, barriers, CCTV, stewards and security staff all form part of the mitigations. The LOSPG, including the Metropolitan Police Service scrutinise and approve the plans for each event.

Waste Management

The GLA engages Veolia on Trafalgar Square for cleansing and waste management, the same contractor as Westminster City Council employees to cleanse the surrounding streets, this ensures a co-ordinated and smooth clean-up during and after major events.

Consultation

Consultation with members of the Trafalgar Square Neighbours Group will be conducted quarterly per annum.

Trafalgar Square Neighbours Group' is constituted by representatives invited from the National Gallery, National Portrait Gallery, Canada House, St-Martins-in-the- Fields, South African High Commission, Westminster City Council, the Metropolitan Police Service and any other premises within the vicinity, as appropriate.

The GLA would be happy to add your organisation to this consultation group.

This platform provides a space for the GLA and key stakeholders to discuss upcoming events and the relevant mitigations needed to ensure these can take place with minimal impact.

We hope the above information provides you with some assurance that we can safely manage the events as proposed in our premises licence application.

We would be more than happy to meet to discuss this if you would like further information, and to assure you that your representation will be fed into the planning process for future events.

Please contact us via uclf.community@ls.uk

Look forward to hearing from you,



LS Events

REFERENCE: Trafalgar Square Premises Licence Application

[REDACTED]

DATE: Thursday 11 April 2024

Dear [REDACTED],

We are contacting you from LS Events, the Event Management Company contracted on behalf of the Greater London Authority (GLA) in response to your representation against our proposed Premises Licence for Trafalgar Square.

Thank you for your engagement in the matter concerning our premises licence application. Your input is valuable to us, and we are committed to addressing the concerns you have.

We would like to address your specific concerns as follows:-

The GLA are requesting a total of 40 licenseable event days per year. This has not increased from the GLA's existing licence for Trafalgar Square. We can assure you that the application is not for events seven days a week and fifty-two weeks a year.

Extensive consultation has taken place with Westminster City Council and the Met Police prior to submission to the application and the conditions we propose are vastly more comprehensive than those on the existing premises licence.

As part of the planning process for all events to be held under the licence, event management plans must be submitted to the LOSPG group (Licensing Operations Safety Planning Group), for approval. This group consists of the responsible authorities including Westminster City Council, The Metropolitan Police, London Fire Brigade, London Ambulance and other key stakeholders.

I hope the above information provides you with some assurance regarding the number of events taking place under the licence, and the involvement with Westminster City Council.

Should you require any further information please contact us via uclf.community@ls.uk

Thanks

[REDACTED]
LS Events

REFERENCE: Trafalgar Square Premises Licence Application

DATE: Tuesday 16th April 2024

Dear [REDACTED],

We are contacting you from LS Events, the Event Management Company contracted on behalf of the Greater London Authority (GLA) in response to your representation against our proposed Premises Licence for Trafalgar Square.

Thank you for your engagement in the matter concerning our premises licence application.

We would like to address your specific concerns as follows:-

The GLA has an existing licence for events in Trafalgar Square. The total number of licensable events proposed in our new licence application remains at 40 (in line with the existing licence). The capacity of the proposed licence remains at a maximum of 19,999 persons, including staff, (also in line with the existing licence).

Extensive consultation has taken place with Westminster City Council (WCC) and the Metropolitan Police Service prior to submission of our application and the conditions we propose are vastly more comprehensive than those in the existing premises licence.

Some concerns are expressed about compliance with WCC policies. We can reassure you that during the pre-application engagement with WCC and the Responsible Authorities, all relevant policies were identified and discussed. These policies are addressed in the proposed conditions and in the plans which comprise the Event Management Plan which is event specific.

As a condition of the licence, events operating under the new licence will require an Event Management Plan which must be supplied to and be approved by the Licensing Operations Safety Planning Group (LOSPG) which comprises representatives such as WCC, Metropolitan Police Service, London Fire Brigade and other responsible authorities. This Event Management Plan contains plans such as the Event Safety Plan and Risk Assessment, Crowd Management Plans, Ingress and Egress Management Plans, Stewarding and Security Provision, Noise Management Plans, Waste Management Plans plus many more. The conditions require these plans to be scrutinised by LOSPG against the risk assessment for the individual events before the events can take place.

Road Closures

We recognise that road closures have an impact which we seek to address by keeping the number of closures and the times for closures to a minimum. New conditions have been added in our application to include a requirement for a Transport Assessment, Road Closure Plan and Traffic Management Plan to be prepared and agreed through the LOSPG scrutiny process. In addition, we will provide advance notice of events where road closures will be in place which will clearly identify the specific closures and the times of the closures.

Sound Management

A Noise Management Plan will be in place, approved by the LOSPG to manage the sound and maximum music noise levels fixed for the duration of all events. Surrounding properties and the relevant amenity groups in the immediate vicinity of the Square will be contacted as soon as reasonably practicable prior to the events advising them of the dates and times of the Event and any sound check or rehearsal times.

Resident/Business Phonenumber

Details of the resident phonenumber will be published prior to events so that any issues and concerns during events can be notified and swiftly dealt with.

Stewarding and Security

As part of the planning within the LOSPG, a Security and Crime Reduction Plan is created for each event which assesses the specific risks for the event and puts in place mitigations for incidents of Anti-Social Behaviour. Fencing, barriers, CCTV, stewards and security all form part of the mitigation. Counter-terrorism measures are also planned and coordinated with specialist officers of the Metropolitan Police Service. The LOSPG, including the Metropolitan Police, scrutinise and approve the plans for each event.

Crowd Management

A specific Crowd Management Plan will be prepared for events. This will address potential issues and their mitigations both within the Licensed Area and outside the Licensed Area. Ingress and dispersal of the audience, specific to the event is one of the key issues which will be addressed.

Alcohol Management Plan

An Alcohol Management Plan will be prepared for all events where alcohol is to be sold or supplied. As with all other plans, this will be subject to the approval of LOSPG and the Metropolitan Police Service. You will also note that the proposed conditions comprehensively address the requirements and management for the supply of alcohol.

Waste Management

The GLA engages Veolia on Trafalgar Square for cleansing and waste management, the same contractor as WCC employs to cleanse the surrounding streets, this ensures a co-ordinated and smooth clean-up during and after major events.

Children and Vulnerable Persons

We agree that this is a key concern for all events and is addressed in our proposed conditions and plans. A strict Challenge 25 Policy will be in place and enforced by trained staff. Security staff will monitor for proxy sales. Welfare and safeguarding provisions will be in place to care for children, for example, lost children, and the care of other vulnerable persons.

Consultation

Consultation with members of the Trafalgar Square Neighbours Group will be conducted quarterly per annum.

Trafalgar Square Neighbours Group' is constituted by representatives invited from the National Gallery, National Portrait Gallery, Canada House, St-Martins-in-the- Fields, South African High

Commission, Westminster City Council, the Metropolitan Police Service and any other premises within the vicinity, as appropriate.

The GLA would be happy to add [REDACTED] to this consultation group.

This platform provides a space for the GLA and key stakeholders to discuss upcoming events and the relevant mitigations needed to ensure these can take place with minimal impact.

We hope the above information provides you with reassurance that all events held under our proposed licence will be properly planned, safely managed and cause as little impact on the local community as possible.

We would be more than happy to meet to discuss this if you would like further information, and to assure you that your representation will be fed into the planning process for future events.

Please contact us via uclf.community@ls.uk

Look forward to hearing from you,

[REDACTED]
[REDACTED]

LS Events

REFERENCE: Trafalgar Square Premises Licence Application

DATE: Thursday 11 April 2024

Dear [REDACTED],

We are contacting you from LS Events, the Event Management Company contracted on behalf of the Greater London Authority (GLA) in response to your representation against our proposed Premises Licence for Trafalgar Square.

Thank you for your engagement in the matter concerning our premises licence application. Your input is valuable to us, and we are committed to addressing the concerns you have.

We trust that the meeting held on the 10th April 2024 has provided adequate information around the application. However, we would be more than happy to meet again to continue engagement with you, and to assure you that your representation will be fed into the planning process for future events.

Please contact us via uclf.community@ls.uk

Look forward to hearing from you,

[REDACTED]
LS Events

REFERENCE: Trafalgar Square Premises Licence Application

DATE: Tuesday 16th April 2024

Dear [REDACTED],

We are contacting you from LS Events, the Event Management Company contracted on behalf of the Greater London Authority (GLA) in response to your representation against our proposed Premises Licence for Trafalgar Square.

Thank you for your engagement in the matter concerning our premises licence application.

We would like to address your specific concerns as follows:-

The GLA has an existing licence for events in Trafalgar Square. The total number of licensable events proposed in our new licence application remains at 40 (in line with the existing licence). The capacity of the proposed licence remains at a maximum of 19,999 persons, including staff, (also in line with the existing licence).

Extensive consultation has taken place with Westminster City Council (WCC) and the Metropolitan Police Service prior to submission of our application and the conditions we propose are vastly more comprehensive than those in the existing premises licence.

Some concerns are expressed about compliance with WCC policies. We can reassure you that during the pre-application engagement with WCC and the Responsible Authorities, all relevant policies were identified and discussed. These policies are addressed in the proposed conditions and in the plans which comprise the Event Management Plan which is event specific.

As a condition of the licence, events operating under the new licence will require an Event Management Plan which must be supplied to and be approved by the Licensing Operations Safety Planning Group (LOSPG) which comprises representatives such as WCC, Metropolitan Police Service, London Fire Brigade and other responsible authorities. This Event Management Plan contains plans such as the Event Safety Plan and Risk Assessment, Crowd Management Plans, Ingress and Egress Management Plans, Stewarding and Security Provision, Noise Management Plans, Waste Management Plans plus many more. The conditions require these plans to be scrutinised by LOSPG against the risk assessment for the individual events before the events can take place.

Hours

Your representation suggests that the maximum hours of operation we propose are too late “without any form of structured Dispersal Plan or Noise Management Plan”. We can reassure you that Dispersal Plans and Noise Management Plans will be prepared and scrutinised in the LOSPG Forum as required by the proposed conditions.

Sound Management

A Noise Management Plan will be in place, approved by the LOSPG to manage the sound and maximum music noise levels fixed for the duration of all events. Surrounding properties and the

relevant amenity groups in the immediate vicinity of the Square will be contacted as soon as reasonably practicable prior to the events advising them of the dates and times of the Event and any sound check or rehearsal times.

Resident/Business Phonenumber

Details of the resident phonenumber will be published prior to events so that any issues and concerns during events can be notified and swiftly dealt with.

Stewarding and Security

As part of the planning within the LOSPG, a Security and Crime Reduction Plan is created for each event which assesses the specific risks for the event and puts in place mitigations for incidents of Anti-Social Behaviour. Fencing, barriers, CCTV, stewards and security all form part of the mitigation. Counter-terrorism measures are also planned and coordinated with specialist officers of the Metropolitan Police Service. The LOSPG, including the Metropolitan Police, scrutinise and approve the plans for each event.

Crowd Management

A specific Crowd Management Plan will be prepared for events. This will address potential issues and their mitigations both within the Licensed Area and outside the Licensed Area. Ingress and dispersal of the audience, specific to the event is one of the key issues which will be addressed.

Alcohol Management Plan

An Alcohol Management Plan will be prepared for all events where alcohol is to be sold or supplied. As with all other plans, this will be subject to the approval of LOSPG and the Metropolitan Police Service. You will also note that the proposed conditions comprehensively address the requirements and management for the supply of alcohol.

Waste Management

The GLA engages Veolia on Trafalgar Square for cleansing and waste management, the same contractor as WCC employs to cleanse the surrounding streets, this ensures a co-ordinated and smooth clean-up during and after major events.

Children and Vulnerable Persons

We agree that this is a key concern for all events and is addressed in our proposed conditions and plans. A strict Challenge 25 Policy will be in place and enforced by trained staff. Security staff will monitor for proxy sales. Welfare and safeguarding provisions will be in place to care for children, for example, lost children, and the care of other vulnerable persons.

Consultation

Consultation with members of the Trafalgar Square Neighbours Group will be conducted quarterly per annum.

Trafalgar Square Neighbours Group' is constituted by representatives invited from the National Gallery, National Portrait Gallery, Canada House, St-Martins-in-the- Fields, South African High Commission, Westminster City Council, the Metropolitan Police Service and any other premises within the vicinity, as appropriate.

The GLA would be happy to add [REDACTED] to this consultation group.

This platform provides a space for the GLA and key stakeholders to discuss upcoming events and the relevant mitigations needed to ensure these can take place with minimal impact.

Limitation on Types of Events and Proposed Additional Conditions

We note in your representation that you propose conditions that would prevent the screening of football events or fan zones and/or the prohibition of the sale of alcohol at such events. In addition, you go further and propose that the space is not suitable for any activities involving sporting events. We do not agree that such conditions are appropriate or proportionate. None of the Responsible Authorities suggest that such conditions are necessary and we are confident that the celebration of sporting events at this location, with the sale of alcohol, can be managed with adequate planning and resources in place.

We hope the above information provides you with reassurance that all events held under our proposed licence will be properly planned, safely managed and cause as little impact on the local community as possible.

We would be more than happy to meet to discuss this if you would like further information, and to assure you that your representation will be fed into the planning process for future events.

Please contact us via ucf.community@ls.uk

Look forward to hearing from you,

[REDACTED]
[REDACTED]

LS Events

**Representation by [REDACTED]
against
Premises: Open Space, Trafalgar Square
Applicant: Great London Authority**

SUMMARY OF REPRESENTATION

**THOMAS & THOMAS PARTNERS LLP
38A MONMOUTH STREET
LONDON
WC2H 9EP**

**Reference: AT/HM/LWT.1.7
Solicitors for the Applicant**

Introduction

1. This submission is made on behalf of [REDACTED] local stakeholder, owner and operator of nearby [REDACTED] [REDACTED] objection to the application for a new premises licence made by the Greater London Authority.
2. [REDACTED] commissioned a report by Dr Philip Hadfield. That report is enclosed with this submission and the Committee is requested to give appropriate weight to the content and findings of that Report based on, inter alia, Dr Hadfield's experience in the Evening and Night-Time Economy ("ENTE") and his 2016 - 17 commission by City of Westminster in relation to its Cumulative Impact Assessment as referenced in the current Statement of Licensing Policy (2021 – 2026). As such, he is an expert in his field and appropriate weight should be put upon his evidence.

The Application

3. The application is to **increase the scope and permissions** of existing premises licence reference 17/04868/LIPDPS ("**the Existing Licence**") so as to, inter alia,;
 - 3.1 Increase the licensed area to include the North Terrace;
 - 3.2 Increase the number of Major Events by 50% from 10 to 15 per annum; &
 - 3.3 Increase the number of events at which alcohol can be sold by 100% from 10 to 20 per annum.
4. There is no condition requiring the Existing Licence to be surrendered before any new licence takes effect. This is not addressed by the applicant's proposed conditions, failing which both licences could be in force at the same time.

The Location

5. Trafalgar Square lies within the West End Buffer Special Consideration Zone and merely a couple of minutes' walk of the West End Cumulative Impact Area (CIA). The CIA has a high density of licensed premises, with concentrated and intense negative cumulative impacts on the Licensing Objectives¹
6. In addition, the 2023 Cumulative Impact Assessment found the West End Buffer Zone to have higher levels of crime and noise complaints than any of the other SCZs, and second only to West End Zone 1, the core Cumulative Impact Area².
7. In line with Policy SCZ1 Applicants for Premises Licences within a SCZ "*should demonstrate that have taken account of the issues particular to the Zone in question*", as identified in the cumulative impact assessments, setting out how they propose to mitigate those issues within their Operating Schedule. The applicant has failed to address the local issues, particularly theft and anti-social behaviour on or around public transport of which there are many in close proximity.
8. Policy paragraphs D47 – 48 note that the West End Buffer Zone "*... is closely associated with*

¹ Policy paragraphs D4 & D5, Appendix 14 and Hadfield Report Executive Summary.

² Hadfield Report paragraph 4.1

dispersal due to the large number of transport hubs; which includes a national rail station, a number of Underground stations and large numbers of night bus routes.” Dispersal from proposed events, particularly late at night would likely result in queues and crowded services at Charing Cross Station, Embankment Station, at bus / night-bus stops and taxi ranks. Pedestrians would disperse far and wide on foot through the West End CIA and beyond. Such dispersal and use of transport hubs will be exacerbated, if granted, by a **50% increase** in events catering for 19,999 and the **doubling** of events at which alcohol can be sold.

Policy Considerations

9. A number of policy considerations apply, including:
 - a) Location within West End Buffer Special Consideration Zone Policy SCZ1 and failure to address specific issues of concern for that location.
 - b) Dispersal into the West End Cumulative Impact Area.
 - c) Unrestricted sale of alcohol at 20 events per annum triggering Pubs and Bars Policy PB1 and indicative of commercialisation of the Square³
 - d) Cinemas, Cultural Venues, Live Sporting Premises and Outdoor Spaces Policy CCSOS1 - Proposed condition 1 not compatible with the events indicated “*The licensable activity authorised by this licence and provided at the premises shall be ancillary to the main functions of the space as a cultural/sightseeing attraction where cultural events are staged*”.
 - e) Licensing Objectives – specific impact on crime and disorder and public nuisance not adequately addressed, particularly in relation to dispersal.
 - f) The proposals are not a ‘live sporting event’ and must therefore be considered under Policy PB1. See also Policy paragraphs F8 and F14.

Cultural Considerations and resulting operational challenges

10. The proposals require all activities to be ancillary to the main functions of the Square as a cultural/sightseeing attraction where cultural events are staged. [REDACTED] do not believe that some of the proposed events, including football, can be considered as ‘cultural’. Indeed, the proposals and intensification of use are the antithesis of the culture which both [REDACTED] embrace and hold dear.
11. The application as proposed does **not** fall within the pre-requisites of Policy CCSO1 and PB1 therefore applies.
12. Long-term cultural erosion from the continued hosting of alcohol-fuelled football events threatens to erode the cultural and historical significance of Trafalgar Square over time, potentially leading to irreversible damage to its legacy as an iconic symbol of British culture and democracy. Such erosion extends to a negative impact on perception among tourists and locals alike, detracting from its image as a dignified and revered public space. The application also signifies an inherent conflict with true cultural activity in the West End, particularly in theatreland, and alcohol-fuelled events may disrupt or overshadow cultural activities and celebrations that are more aligned with the Square's historical significance, diminishing their impact and importance.

³ Dr Hadfield Report – paragraph 7.2.

13. Rowdy behaviour associated with alcohol consumption can also disrupt the peaceful atmosphere of Trafalgar Square, detracting from its role as a space for contemplation and reflection, whilst also posing a serious threat to the Square's historic buildings and landmarks with significant damage previously caused.
14. Many operational challenges arise aside of the impact on cultural considerations, from safety concerns arising from the presence of unruly crowds, including audience members with a disability navigating the area, to noise disturbance from loud cheers and chants, crowd management issues from overcrowding and bottlenecks and in increased terrorism threat associated with large volumes of people congregating in the area.

Specific concerns in relation to Football

15. [REDACTED] original representation details historical context and evidence of disruption and damage arising from previous events. Whilst all competitive sport raises concern, particular concerns arise from football events⁴.
16. To address these concerns, [REDACTED] invites the Sub-Committee to condition the premises licence to prevent its use for football screenings or fan zones as follows:

(a) There will be no 'screenings' of football events or the provision of fan zones or similar; or [if (a) is not adopted]

(b) No alcohol shall be sold at football, fan zones or similar events.

Contracted out provisions

17. The Operating Schedule and Proposed Conditions indicate that many of the required services will be delivered by a range of sub-contractors and not by the Applicant or LS Events directly. Resulting concerns are the manner in which those sub-contractors are aware of and adhere to the premises licences and any conditions not expressly included on the face of the licence.

Conclusion

18. The proposals, if granted, would manifestly intensify events where alcohol is sold, attracting large crowds on a regular basis.
19. If granted, the resulting licence will see movement and dispersal of crowds into the SCZ, CIA and surrounding residential streets, thoroughfares, licensed premises, and transport services that are already under pressure⁵. Likely consequences include environmental degradation through increased noise, congestion, littering and potential public nuisance, as well as an increase in crime and disorder associated with the sale of alcohol with patrons as both victims and perpetrators and a wholesale attack on the cultural sanctity of the West End.

⁴ Dr Hadfield Report – paragraph 6.10

⁵ "Cumulative impact in Zone 2 is likely significantly shaped not just by the premises that sit within it, but also dispersal from the acutely affected Zone 1 and hosting key transport hubs Charing Cross, Embankment...The area around Charing Cross station, towards Embankment demonstrated particularly persistent patterns of serious violent crime in the evening and night, as well as high rates of ambulance call outs to the location of licences" (Policy p.168, Appendix 14, paras: 21-22).

20. Whilst [REDACTED] has no objection to **true cultural events**, it is very concerned about the cultural impact of alcohol themed sporting events. Dr Hadfield's Report at paragraph 6.10 refers.
21. A *doubling* of the number of events at which alcohol is served indicates an increased commercialisation of the Square through the sale of an age-restricted and generally regulated product. This changes the nature of the events whilst narrowing their potential appeal, even more so with the increase in alcohol sales available at 50% of all events.
22. The proposals require licensable activities to be "*ancillary to the main functions of the space as a cultural/sightseeing attraction where cultural events are staged.*" The applicant is put to strict proof that the proposals comply with both the wording and spirit of this condition.

16 April 2024

www.philhadfield.co.uk

Trafalgar Square
Public Open Spaces, WC2N 5DS

Premises Licence Application

Dr Philip Hadfield

BA Hons (Keele) Mphil (Cantab) PhD (Durham)

Director: www.philhadfield.co.uk

**Consultant: Arcola Research LLP, Ingenium
Research, Institute of Alcohol Studies**

Advisory Board (formerly Senior Research Fellow)

**Centre for Criminal Justice Studies, School of Law,
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Executive Summary

London's West End has historically been a place of gathering and celebration. It contains the largest Evening and Night-Time Economy (ENTE) in Europe and one of the most significant globally. The area is also a magnet for protests and demonstrations, with open public spaces such as Trafalgar Square, in particular, being the focus of unofficial gatherings by crowds. These gatherings occur in addition to the daily tourist footfall and the series of annual events organised by event promoters on behalf of the GLA that form the impetus for this licence application. Trafalgar Square is one of London's iconic public spaces, a meeting place accessible to all of London's citizens, communities and national and international visitors. It is therefore a 'place' of some significance, not simply a 'space' within the urban fabric. The Square suitably requires high standards of maintenance and management as part of London's heritage, current appeal and future legacy.

In response to their statutory obligations under the Licensing Act 2003, the City of Westminster has a long-standing Cumulative Impact Policy, the evidence for which was refreshed in 2023 through an internally-generated data analysis review. In Westminster's Statement of Licensing Policy 2021-26, Trafalgar Square lies within West End Zone 2 and within 3-minutes' walk of West End Zone 1; that part of Westminster with the highest density of licensed premises, also correlated in the partnership data with the most concentrated and intense negative cumulative impacts on the Licensing Objectives. In policy terms, Zone 2 is designated a 'Special Consideration Zone (SCZ) and referred to as the 'West End Buffer'. Applicants for Premises Licences within a SCZ "*should demonstrate that have taken account of the issues particular to the Zone in question*", as identified in the cumulative impact assessments, setting out how they propose to mitigate those issues within their Operating Schedule.

This licence application seeks to increase the licensable area of events on Trafalgar Square to include the North Terrace in front of the National Gallery, the number of Major Events to increase by 50% from 10 to 15 per annum, and the number of events where alcohol can be served from 10 to 20 per annum (an increase of 100%); representing half of the total number of 40 annual events involving licensable

entertainment. In their list of proposed Conditions, the Applicant is requesting a further 10 days per annum involving rehearsals for licensable events, bringing the annual total number days to 50 for event-related activity. The 15 Major Events will require road closures on some or all of the three surrounding roads.

Most advertised events in the GLA's 2024 schedule for Trafalgar Square, including St. Patrick's Day and Vaisakhi have had advertised closing times of 18:00, and none later than 19:00 (<https://www.london.gov.uk/events>). However, mirroring the current Premises Licence, the application seeks permission to serve alcohol up to 22:00 and provide regulated entertainment up to 23:00, with a closing time of up to midnight on any day of the week. The potential to stretch future events into the night-time hours therefore seems apparent.

Given the location there is clearly an interaction between events in the Square and the West End's core ENTE. Indeed, with up to 20 events per annum serving alcohol to up to 19,999 people on each occasion, the Square would itself form a new integral part of that ENTE, just outside of the West End Zone 1 CIA boundary. There are, therefore, certain to be a range of impacts that occur even though individual events may be thoroughly prepared and well-managed. These relate to the movement and dispersal of crowds into surrounding residential streets, thoroughfares, licensed premises, and transport services that are already under pressure from the sheer weight of human traffic. This is not simply my professional opinion. The Westminster Licensing Policy 2021-26 notes that:

"Cumulative impact in Zone 2 is likely significantly shaped not just by the premises that sit within it, but also dispersal from the acutely affected Zone 1 and hosting key transport hubs Charing Cross, Embankment...The area around Charing Cross station, towards Embankment demonstrated particularly persistent patterns of serious violent crime in the evening and night, as well as high rates of ambulance call outs to the location of licences" (p.168, Appendix 14, paras: 21-22).

Not only is there a risk of environmental degradation through increased noise, congestion, littering and potential public nuisance, there is also a risk of detrimental changes to public perceptions of the Square. A doubling in the number of events at

which alcohol is served suggests the increased commercialisation of the Square through the sale of an age-restricted and generally regulated product. This changes the nature of the events whilst narrowing their potential appeal. The sale of alcohol at 50% of all events in the Square is likely to be exclusionary to some family audiences and faith groups. It places those children who do attend under increased exposure to alcohol-related harms, including proxy sales, witnessing alcohol misuse and alcohol-related disorder by adults. Increasing the availability of alcohol is also out of step with general lifestyle trends amongst young adults who are increasingly choosing to be alcohol-free. Many actors within the hospitality and leisure sector are seeking to respond to such trends rather than to resist them. Certainly, crowd management becomes easier once alcohol consumption is reduced, or taken out of the equation, but conversely becomes more challenging when the availability of alcohol is increased. This number of licensable events, rehearsals and road closures and the hours proposed create some doubt as to the viability of the Applicant's proposed Condition 1, that even with the significant intensification of licensable activity they propose, licensed uses will remain 'ancillary' and the Square will retain its traditional 'core function' as a cultural/sightseeing attraction.

In conclusion, this application appears to stem from a desire to make events in Trafalgar Square more commercially profitable, without at the same time enhancing the provision of 'public goods', such as improving the general appearance, maintenance and supervision of the Square and its accessibility to all. The proposals would significantly intensify licensed uses, attracting large crowds on a regular basis. Using Trafalgar Square in this way risks enlarging the area of the West End identified in the City of Westminster's 2020 and 2023 Cumulative Impact Assessment exercises as experiencing the most intensive negative cumulative impacts. This is strong evidence, and is foundational to Westminster's wider licensing policy framework. As a result, I do not see how this application supports the Licensing Objectives in Westminster.

Introduction

1. The author

- 1.1 I am currently Director of www.philhadfield.co.uk a research and training consultancy working in the alcohol licensing and crime prevention field. I have previously held posts as a Senior Research Fellow at the University of Leeds, a Research Officer at the University of Durham and a Lecturer in Criminology at the University of York.
- 1.2 My consultancy and research interests focus upon crime prevention, policing and regulatory matters, with special reference to the Evening and Night-Time economy (ENTE). I have managed and worked on research projects on these topics since 1998 and have authored and co-authored a number of the leading books, reports and articles in this field, alongside contributing to the national and international ‘conversation’ on the ENTE at conferences and networking events. In recent years, I have focused, in particular, upon improving the data collection methodology for evidence-led ENTE regulation; providing detailed insights that support complex problem solving and pragmatic decision-making. Further details of my professional activities and credentials may be found in the Appendix to this report.
- 1.3 In licensing consultancy matters, my approach is premised upon an independent assessment of operating standards, public policy and regulatory issues, which take the reduction of harm as their key goal.¹ This involves assessing each set of circumstances as they relate to the statutory Licensing Objectives and associated legislation, Home Office Guidance and best practice. I have particularly lengthy experience in matters of assessing licensed premises whose Premises Licences are under Review and in making

¹ See Robson, G. and Marlatt, A. (2006) ‘Harm Reduction and its Application to Alcohol Policy,’ *International Journal of Drug Policy*, 17(4) Special Issue: 255-376.

assessments of cumulative impact, helping councils weigh the evidence that might underpin such spatial designations (or alternative interventions). I have worked in such capacities since first implementation of the Licensing Act in 2005 and previously under the Licensing Act 1964 regime, bringing broad insight into the recent development of licensing policy and practice, particularly as it relates to the gathering of empirical evidence.

- 1.4 In 2016 - 2017 I was commissioned by the City of Westminster to conduct a 'Mayfair Cumulative Impact Assessment observational exercise'. My report is referenced in the current Westminster Statement of Licensing Policy 2021-26 at Paragraph D41. In this work, I attributed negative cumulative impacts on the Licensing Objectives to the proliferation of late-night licensed premises operating in Berkeley Street, Berkeley Square and Dover Street (but not Shepherd Market).
- 1.5 The City of Westminster subsequently, in October 2020, produced their own 'Cumulative Impact Assessment' which considered the statistical evidence of negative cumulative impacts on the Licensing Objectives in Westminster. As part of the Licensing Policy review, Westminster introduced a new category of 'Special Consideration Zone' (SCZ) within their Statement of Licensing Policy 2021-26. These Zones, include an area labelled the West End Zone 2 / The West End Buffer. As with the cumulative impact area (West End Zone 1) the SCZs have tightly-drawn boundaries, as defined on the maps within Westminster's Policy. Applicants for premises licences or licence variations within these zones are asked to consider and address the issues raised by the cumulative impact assessment for the location of their premises and to include in their Operating Schedules proposed measures to mitigate any negative impacts. The City of Westminster repeated their City-wide CIA exercise in 2023, using more recent post-pandemic statistical data sources from 2022. The findings of this 2023 exercise, as they relate to West End Zone 2 / The West End Buffer, are outlined in Section 4 of this report.

2. Trafalgar Square: Case overview and research methods

2.1 I have received instructions from Thomas and Thomas Partners LLP acting on behalf of [REDACTED] in respect of their Representation in response to a Greater London Authority (GLA) Premises Licence Application. The application seeks to expand the annual provision of licensed open air events in Trafalgar Square, increasing the size of the area for licensable activities, the number of events and rehearsals for events, and the number of events at which alcohol may be sold and consumed.

2.2 In March 2024, Thomas and Thomas provided me with various documents pertaining to the application. These comprised: the Premises Licence Application, the existing Premises Licence, a boundary map of the proposed expanded area for licensable activities, and the Applicant's Operating Schedule and list of Proposed Conditions for licensed events in the Square, prepared by the Applicant and the proposed event operators, LS Events.

2.3 I also consulted the City of Westminster Statement of Licensing Policy 2021-2026, the Westminster Cumulative Impact Assessment documents published in 2020 and 2023 and the Revised Guidance issued under s182 of the Licensing Act 2003 (as updated in December 2023).

2.4 I was also provided with the letter of Representation from [REDACTED]. However, at the time of writing, I have not been made aware of any other Representations, for example from the Responsible Authorities, or from other Interested Parties.

2.5 These documents informed my understanding of the Applicant's proposed ambitions for their annual event series in the Square and associated licensing requirements. Read in combination, these documents gave insight into both the specifics of the proposed Licensable Activities at the site and their 'fit' within the broader context of the application in Westminster, given the

proposed modes of operation.

2.6 Upon reading this documentation, I agreed to prepare this report setting out my professional assessment of how the Applicant's proposals might influence promotion of the Licensing Objectives in Westminster. I draw on over 20 years' experience of gathering and assessing research data to inform the drafting of Licensing Policies, and particularly Cumulative Impact Policies, in 'high impact' urban areas, including Westminster, Hackney, Camden and Southwark and other major Evening and Night-Time Economies (ENTEs) in UK cities including Newcastle, Cardiff, Brighton, Liverpool and Leeds. These areas provide useful comparisons as they all have large vibrant ENTEs and operate long-standing Cumulative Impact policies in support of the statutory Licensing Objectives.

2.7 In preparing this report I made an unannounced day-time visit to Trafalgar Square and its surroundings on Tuesday 2nd April 2024. Neither the Applicant, [REDACTED] nor staff at Thomas and Thomas, knew the dates and times I would visit, although it was requested that I visit ahead of this Hearing.

2.8 As a result of the above, I was able to refresh my understanding, at first-hand, of the spatial arrangements at the site, the positioning of residential properties and current public uses, the pathways to the nearest public transport options and the location's connectivity to other areas of London's West End. This enabled me to understand what issues might arise in licensing terms were events at the site to increase in number and scale. Given the importance of pedestrian dispersals and connectivity to the West End, I walked the 3-minute route to the east of the Square from St Martin's Place / Charing Cross Road and the 3-minute route to and from Haymarket to the west. These locations form the most proximate southern boundaries of West End Zone 1 (the Cumulative Impact Area), as defined in the Westminster Statement of Licensing Policy 2021-2026.

3. Trafalgar Square: Premises Licence Application

3.1 This Premises Licence application seeks to increase the licensable area of events on Trafalgar Square to include the North Terrace in front of the National Gallery, the number of Major Events to increase by 50% from 10 to 15 per annum, and the number of events where alcohol can be served from 10 to 20 per annum (an increase of 100%); representing half of the total number of 40 annual events involving licensable entertainment. In their list of proposed Conditions, the Applicant is requesting a further 10 days per annum involving rehearsals for licensable events, bringing the annual total number days to 50 for event-related activity. The 15 Major Events will require road closures on some or all of the three surrounding roads. The proposed events are to be operated by LS Events (LSE) on behalf of the Greater London Authority (GLA).

3.2 The proposal is that on event days there will be a programme of open-air licensable activities within the Square, including some mixture of live and recorded music entertainment, theatre and film showings and food and drink. Events will involve the erection of a stage and a number of bars located across the site. A variety of suppliers will be used to operate the bars, the entertainment offer, and to provide security and other essential services.

3.3 Mirroring the current Premises Licence, the application seeks permission to supply alcohol up to 22:00 hrs and provide Regulated Entertainment including plays, films, live music, recorded music, performance of dance, all to run up to 23:00 hrs, with a closing time of up to 00:00 (midnight) on any day of the week. The proposed capacity of the events (also mirroring current permission) is to host up to 19,999 people, on each occasion.



Image 1: The North Terrace which is proposed to be included as a ‘licensable area’ for events. To the left one sees the National Gallery and to the right, the church of St Martin-in-the Fields.



Image 2: The North Terrace and the steps up to it are popular vantage points for visitors as they provide elevated views, the steps of St Martin-in-the-Fields are also used in this way.



Images 3 and 4: Even on a grey, randomly chosen, afternoon in March the Square was found to be popular and performing its core function as a cultural and sight-seeing attraction for tourists and visitors. As such, it is one of the few large, non-commercialised, public spaces in the West End.



Image 4: The majority of sightseers were found to be foreign visitors.

Policy Context

4. The City of Westminster Statement of Licensing Policy 2021-26

4.1 Trafalgar Square falls within West End Zone 2 / The 'West End Buffer', a designated Special Consideration Zone (SCZ) in the City of Westminster's Statement of Licensing Policy 2021-26. Westminster's 2023 Cumulative Impact Assessment found that: "*the West End Zones defined in the previous CIA (2020) still remain the focal point of cumulative impact within the borough*" (p.51). Moreover, the 2023 assessment found the West End Buffer to have higher levels of crime and noise complaints than any of the other SCZs, and second only to West End Zone 1, the core Cumulative Impact Area. The Licensing Policy Statement notes that:

"Cumulative impact in Zone 2 is likely significantly shaped not just by the premises that sit within it, but also dispersal from the acutely affected Zone 1 and hosting key transport hubs Charing Cross, Embankment...The area around Charing Cross station, towards Embankment demonstrated particularly persistent patterns of serious violent crime in the evening and night, as well as high rates of ambulance call outs to the location of licences" (p.168, Appendix 14, paras: 21-22).

4.2 Page 55, Paras D47-48 of the Policy notes that the West End Buffer:

"...is closely associated with dispersal due to the large number of transport hubs; which includes a national rail station, a number of Underground stations and large numbers of night bus routes.

Although all incident rates are well above the borough average, the key local issues that need to be considered by applicants are:

- *Robberies.*
- *Theft.*
- *Antisocial behaviour on and around public transport.*

- *Incidents relating to ambulance call outs at night to the locations of licensed premises for intoxication, injury related to intoxication and/or assault.”*

4.3 The Cumulative Impact Assessment 2023 notes the following in relation to the precise locations of alcohol-related offences across the West End:

“... There are further smaller concentrations around Charing Cross train station and the Embankment area at the west end of the Strand and close to Trafalgar Square.”
(p.83).

4.4 In relation to all licence applications that fall within the West End Buffer SCZ, applicants are required to set out any proposed mitigation measures in relation to the list of issues (as identified in the Cumulative Impact Assessments) within their operating schedule.

4.5 The proximity of Trafalgar Square to the locations identified in the Policy and at p.83 of the CIA 2023 is very apparent, as illustrated in the following images:



Image 5: The east of Trafalgar Square is a key location for bus and night bus services and is the start point for the N29 service which travels north through St. Martin's Place, Leicester Square and Cambridge Circus within the Cumulative Impact Area. Visitors seeking rail, tube and night-tube services are directed to Charing Cross Station.



Image 6: The west of Strand contains further bus and night bus services for travel west-east / east-west. This stop is approximately 1-minutes' walk from Trafalgar Square.

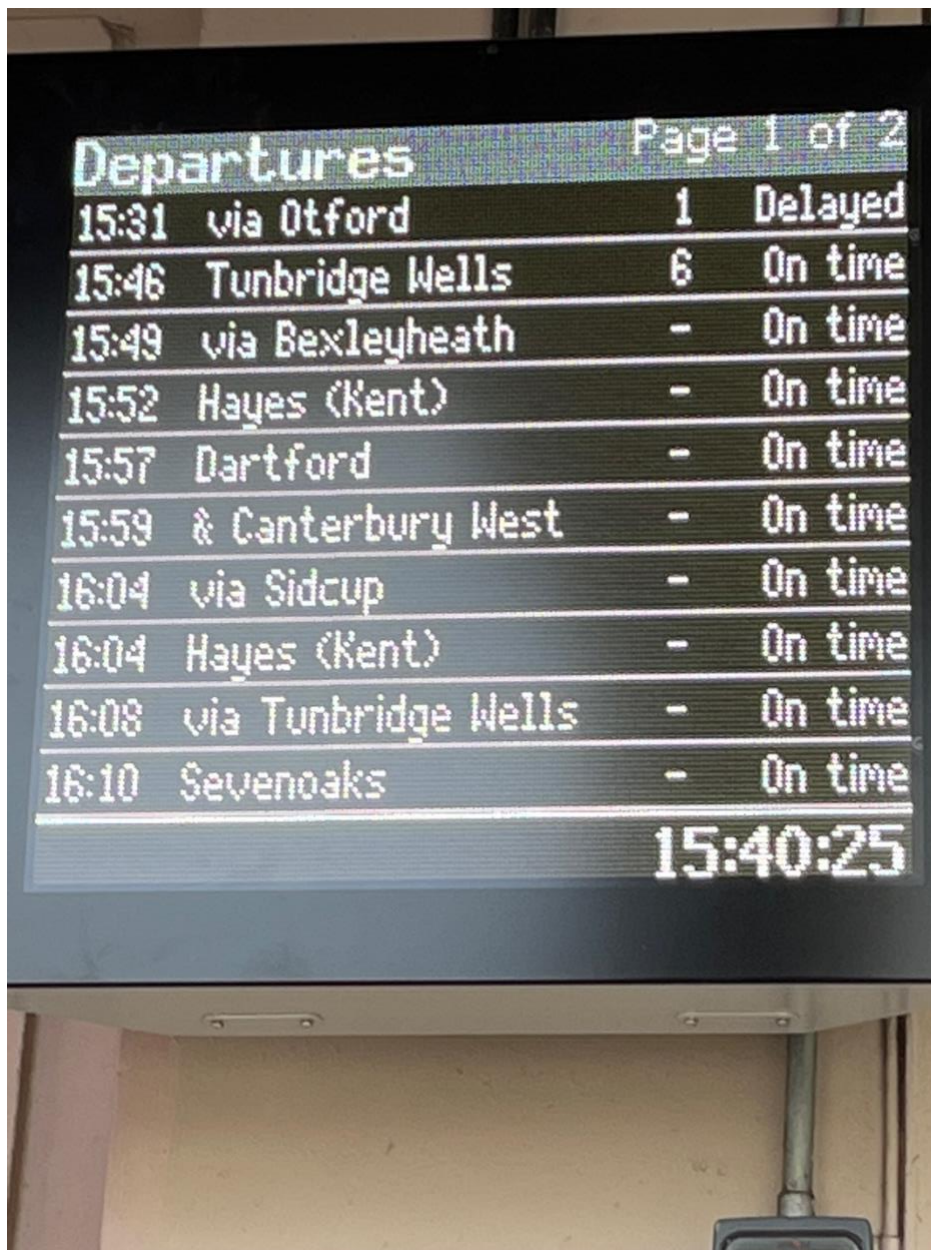


Image 7: Charing Cross Rail Station (approximately 2-minutes' walk) offers rail services to the south and south east, notably to Kent and the Medway.



Image 8: Charing Cross serves the Bakerloo and Northern London Underground Lines, with Night-tube services after midnight on the Northern Line on Friday and Saturdays only.

4.6 The City of Westminster also has a Core Hours Policy (HRS1) which applies to the use of Outdoor Spaces (in addition to indoor licensed premises). The hours are Monday to Thursday 09:00 to 23:30, Friday and Saturday, 09:00 to Midnight, Sunday: 09:00 to 22:30 and Sundays immediately prior to a Bank Holiday: 09:00 to Midnight.

4.7 The purpose of the Hours Policy is to work alongside the Spatial Policies to protect the Licensing Objectives in Westminster. Applications to conduct licensable activities beyond Core Hours must include details of how the proposed operations will seek to mitigate the impacts of later trading / closing times.

4.8 Events in the Square have a licensed end time of Midnight. These hours are therefore within Core Hours only on Fridays, Saturdays and those Sundays

immediately before a Bank Holiday; they are routinely 30-minutes beyond Core Hours Monday-Thursday and 90-minutes beyond Core Hours on Sundays. It should be considered that the Applicant is proposing to significantly increase the number of large-scale licensed events and crowds of up to 20,000 people will take longer to disperse than would be the case with individual indoor spaces within the West End which typically have much smaller capacities. At a practical level therefore, there is certain to be some overlap of dispersals, with crowds from the events joining the patrons of the large proportion of licensed premises in West End Zones 1 and 2 that operate until around 23:00-00:00.

Operational Aspects

5. The Operating Schedule and Proposed Conditions

5.1 The application includes an Operating Schedule and list of Proposed Conditions drafted by the organisers LS Events, which is to be put before membership of the Licensing, Operational and Safety Planning Group (LOPSG). The role of the LOPSG appears central to the Applicants plans for delivery of the events, however, at the time of writing, membership of the LOPSG has not been confirmed and it is unclear if the goal of 'no objections' from the Responsible Authorities has been achieved.

5.2 Should the LOPSG require it, an Event Management and Operating Plan (EMOP) will be produced, providing detailed plans for the design and operation of events. This plan shall be submitted within an agreed timetable and be subject to the scrutiny of the LOPSG, no later than 2-months prior to the first event date. It is not proposed that each event to be held in the Square will have its own EMOP. Nonetheless, the risk profile and risk assessment of events will inevitably vary. In conjunction with the Metropolitan Police and the LOPSG, for each event, *where required*, the applicant will produce some combination of the following:

- CCTV Plan;
- Alcohol Management Plan (if appropriate)

- Crowd Management Plan (including Security and Stewarding Plan);
- Egress Management Plan;
- Event Control Statement of Intent;
- Ingress Management Plan;
- Security and Crime Reduction Plan; inc. overnight security arrangements;
- Lighting Plan.

5.3 The Operating Schedule makes clear that the “*detailed Crowd Management Plan that will be drawn up by the appointed security contractor, will specify numbers of staff and roles, where SIA qualified staff are required and emergency procedures (e.g. evacuation of the site). This plan will integrate with the EMOP for the event and will be produced in conjunction with the Metropolitan Police, the designated security contractor and the applicant.*”

All activity within the licensed area will be appropriately managed with SIA security and stewards. A pre-agreed level of professional stewarding and SIA security personnel will have a designated responsibility to maintain a safe environment for members of the public attending the event”.

5.4 It is clear from the Operating Schedule and Proposed Conditions that many of the services required to host the events are to be delivered by a range of sub-contractors and not by the Applicants, or LS Events directly. The number and location of bars and a nominated Designated Premises Supervisor for the events is not specified. Although the LOSPG is unconfirmed one would expect this must, by necessity, include the London Fire Brigade, London Ambulance Service, the City of Westminster and the Metropolitan Police Service.

5.5 Much of the detail and specifics one might expect to find in a Premises Licence Operating Schedule and list of Proposed Conditions is missing in this proposal and one is pointed in the direction of, yet to be devised, Event Management and Operating

Plans (EMOP) and other measures as required by the LOSPG on a future case-by-case basis. It is therefore not possible for Interested Parties within the licensing process such as local residents and businesses to gauge and assess the detail of what is proposed and its potential impacts on particular locations in and around the Square. Information on projected ingress and egress flow rates and the dates and times of road closures, for example, are not provided.

5.6 This lack of specificity is out of step with the way in which licensing hearings are envisaged under the Licensing Act and associated Guidance. The Hearings are an opportunity for Sub-committee members and Interested Parties to hear the details of an Applicant's proposals and to consider how these will impact the location in question such that a licence may be granted or denied and, if granted, an appropriate and targeted list of Conditions may be set. This becomes all the more important in the light of Westminster's spatial policies and Trafalgar Square's location within a SCZ. The Operating Schedule and proposed Conditions make no reference to how the organisers, their sub-contractors and LOSPG partners will meet the 'special considerations' that are required to support the Licensing Objectives in this specific location and the set of current and historical circumstances attached to this location. There is indeed no mention of the City of Westminster's Licensing Policy and how procedures at the events will address the issues that Applicants (for even much smaller and less potentially impactful licensable activities) would be required to address under the West End Buffer SCZ Policy.

6. Trafalgar Square: Increasing the Number of Licensed Events:

Do the Operating Schedule and Proposed Conditions meet the four Licensing Objectives?

6.1 In support of this Premises Licence application the GLA / LS Events have provided an Operating Schedule and list of proposed Conditions. These documents (I presume at the time of writing) provide the Licensing Sub-Committee with the closest outline of the balance of likely impacts anticipated for the licensed events, as set against the range of mitigation measures proposed.

6.2 To consider the proposed expansion of events in licensing terms it is necessary to examine each of the four Licensing Objectives; to look at what issues and challenges arise and the extent to which the Applicant's Operating Schedule / proposed Conditions offer sufficiently robust measures in mitigation. Moreover, it is necessary to consider that Westminster's Statement of Licensing Policy requires that the Applicants in this matter specifically address and respond to the point that the events are to be inserted into a location that is *already* experiencing negative cumulative impacts, as identified in the West End Buffer SCZ policy.

Crime and Disorder

6.3 In relation to the Crime and Disorder objective the Applicant relies heavily on the promise of forthcoming and undisclosed measures to be drawn up in conjunction with the Metropolitan Police Service and other members of the LOSPG. These comprise, *if required*, a Crowd Management Plan, Alcohol Management Plan, Ingress Management Plan, Egress Management Plan and Security and Crime Reduction Plan, amongst others. At the time of writing, the operational details have not been offered in support of this Application and it is unclear if they currently exist in any advanced form.

6.4 On the ground, the dispersals from the proposed events at or around midnight would see queues and crowded services at Charing Cross Station, Embankment Station, at bus / night-bus stops and taxi ranks. Pedestrians would disperse far and wide on foot, returning to their overnight accommodation and homes. A large security

and police presence will be necessary to provide public protection in and around Trafalgar Square, but this will no longer be possible as crowds move further away onto the streets of the West End and the transport network. It should be noted that the crowds would be inserted into the West End Buffer, which Westminster's SCZ policy has identified as already experiencing "*Antisocial behaviour on and around public transport*" (see Section 4, above).

6.5 The 2023 Westminster CI Assessment includes hot spot mapping of crime incidents using data provided by TfL and the British Transport Police (BTP) in relation to the N15 and N29 bus routes in particular, both of which stop in Trafalgar Square, with the N15 also stopping at Charing Cross (ps.30-31). As noted above, **the N29 (south-north) service starts in Trafalgar Square, before passing through some of the most densely populated areas of Covent Garden and Soho within the Westminster Cumulative Impact Area.** Similarly, the N15 takes passengers directly through Piccadilly Circus and along Regent Street, terminating at Oxford Circus.

6.6 In relation to the above it is clear that any 'Egress Management Plan' will need to be a city-wide enterprise and that the impacts will be keenly felt by TfL and other users of the transport network, who will share their journeys with event attendees. Controlling crowds as they leave the events will be necessary, but not sufficient, to meet this Licensing Objective.

Public Safety

6.7 An increase in the availability and sales of alcohol, to encompass 50% of all events in the Square can be predicted to also increase the need for public safety, health and welfare support services, as the proportion of attendees with alcohol-induced illnesses, vulnerabilities, and requiring assistance with alcohol-related accidental injuries will also increase. This has cross-cutting implications for managing the safeguarding of children and the protection of women and girls, increasing the risk of drink spiking incidents and sexual predation, with offenders targeting victims who are, or have been, drinking.

Public Nuisance

6.8 Increasing the number and scale of events in Trafalgar Square will be disruptive to many local residents, workers and businesses as a result of the Central London location in the heart of the West End. The disruption will occur in relation to road closures, local noise from open air amplified sounds and other environmental impacts such as the degradation of streets and other public spaces from the weight of human traffic.



Image 9: Current uses of the Square already require significant investment in maintenance and security.

6.9 The Applicants commit to controlling the sound levels of noise emitted from the open-air events in the Square and acknowledge that public nuisance can arise if events are not well managed. However, there is no specific mention of the impacts on public transport, or the SCZ policy. It is reasonable to foresee that the pressures on public transport services will be significant, as crowds travel through Central London

to attend the event site and once events end, enter streets into which Central London's Evening and Night-Time Economy may also be in full flow, particularly at weekends and on Bank Holidays.

6.10 Sporting and football-related events in particular have strong cultural associations with heavy sessional (binge) drinking and particularly when crowds are outside of the controlled environment of organised events. The 'drink factor' increases the risk of negative impacts from sport-focused events spreading throughout Central London once crowds depart the site and disperse. A proportion of these dispersals may be noisy, with people exiting in groups, possibly singing and chanting. A previous football-related event in Trafalgar Square saw instances of criminal damage to the church of St Martin-in-the Fields, large-scale littering and street urination. There is, of course, a long history of various forms of public nuisance impacts from football-related events when located in central urban areas, in London, nationally, and internationally. This suggests that football-related 'screening' events or 'fan zones' for football or similar sporting events are not appropriate for Trafalgar Square and would be better placed in more peripheral areas where there are fewer potential conflicts of interest and where suitable controls can more easily be applied.

6.11 The proximity of the Cumulative Impact Area (around 3-5 minutes' walk depending on if one walks east or west from the Square) is illustrated in the following images:



Image 10: To the west, Trafalgar Square is clearly visible from the junction of Haymarket and Pall Mall East.



Image 11: To the east and looking south from St Martin's Lane (within the Westminster CIA), one sees the Edith Cavell monument in the foreground and Nelson's Column in the background.



Image 12: This scene was also captured from within the Zone 1 Cumulative Impact Area.

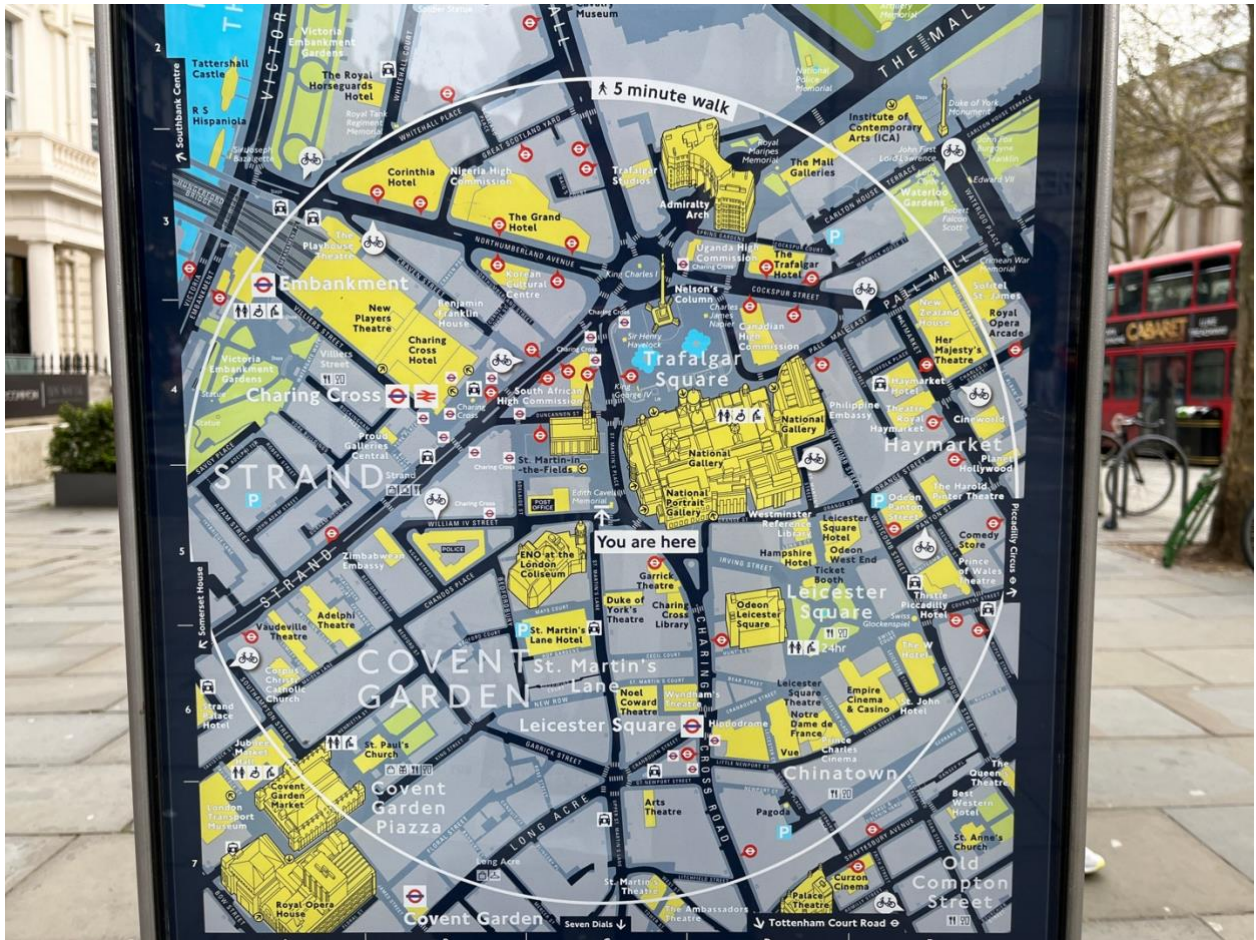


Image 13: A Visitor Information Board identifies the 5-minute' walking radius of St Martin's Place, encompassing key locations within the CIA such as Leicester Square and Chinatown.

Children and Harm

6.12 Children who attend large licensed events are likely to be placed under increased exposure to alcohol-related harms. These include the risk of proxy sales, made easier in a crowded open-air environment, witnessing alcohol misuse and alcohol-related disorder by adults. These harms are likely to occur despite the assurances made by the Applicants with regards to server training and vigilance with respect to proxy sales and under-18s being in possession of alcohol on the event site.

Overview

6.13 Given the location there is clearly an interaction between events in the Square and the West End's core ENTE. Indeed, with up to 20 events per annum serving alcohol to up to 19,999 people on each occasion, the Square would itself form a new integral part of that ENTE, just outside of the West End Zone 1 CIA boundary. There are, therefore, certain to be a range of impacts that occur even though individual events may be thoroughly prepared and well-managed. These relate to the movement and dispersal of crowds into surrounding residential streets, thoroughfares, licensed premises, and transport services that are already under pressure from the sheer weight of human traffic.

6.14 The Applicant offers a list of 66 Proposed Conditions for the Premises Licence. These appear mostly as a generic check-list of operational practices and commitments which could be applied by a responsible operator to any and all events of this potential size. As a generic list, the Proposed Conditions are silent to essential specifics of the proposal: the events being located within the West End Buffer SCZ and the requirements of Westminster's Licensing Policy in this regard, the measures to be taken to protect and secure the stations at Charing Cross and Embankment and in relation to the N15 and N29 bus routes, and measures to protect London's public transport network more broadly, given the potential overlap between egress from the events and dispersals from Westminster's evening and night-time economy.

7. Conclusions

7.1 The choice of Trafalgar Square for this significant increase in licensable activity throughout the year appears to relate to commercial factors and the prestige / attraction of an 'iconic' Central London location; it has not been justified in terms of the Licensing Objectives. The proposals for expanded licensable events are being inserted into a location which has been identified in the two most recent rounds of Westminster Cumulative Impact Assessments as an existing 'hotspot', particularly in relation to crime and anti-social behaviour on and around the public transport network.

7.2 Not only is there a risk of environmental degradation through increased noise, congestion, littering and potential public nuisance, there is also a risk of detrimental changes to public perceptions of the Square. A doubling in the number of events at which alcohol is served suggests the increased commercialisation of the Square through the sale of an age-restricted and generally regulated product. This changes the nature of the events whilst narrowing their potential appeal. The sale of alcohol at 50% of all events in the Square is likely to be exclusionary to some family audiences and faith groups, which runs contrary to the aim of maintaining the Square as primarily a space open to all communities for congregation, the enjoyment of cultural attractions, and sight-seeing.

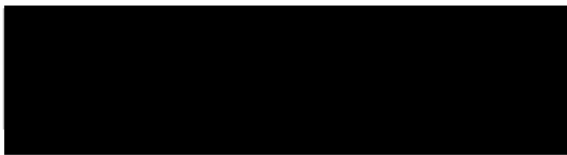
7.3 Although the Applicants can no doubt negotiate more detailed Conditions, with advice from the LOSPG, tweaking ‘best practices’ at the events will not address the broader fundamentals of the challenge. These are the location, timings, and scale of what is proposed and their negative cumulative impacts for Central London, as crowds move across the West End and disperse, including at night between the hours of 23:00 and 00:30.

7.4 If the LSC is minded to permit I would respectfully suggest that if the proportion of events at which alcohol is served is to be increased, alongside a 50% increase in the number of Major Events, and an increased size of the licensable area within the Square, then the capacity of persons to be accommodated at each event should be reduced, and the closing hours for events brought to below Core Hours. Such measures appear necessary in the context of the existing problems of “*anti-social behaviour on and around public transport*” identified for this location within the West End Buffer SCZ policy; issues which have not been convincingly addressed or mitigated by the Applicant.

7.5 Furthermore, it should be acknowledged that preservation of proposed Condition 1, which states that: “*The licensable activity authorised by this licence and provided at the premises shall be ancillary to the main functions of the space as a cultural/sightseeing attraction where cultural events are staged*” will not be compatible with all types of events. The Committee is encouraged to specify that football and other sports-related events in particular cannot be permitted to take place under this condition.

Declaration

I understand that my duty as an expert witness is to the Hearing and this report has been prepared in compliance with that duty. All matters relevant to the issues on which my expert evidence is given have been included in this report. I believe that the facts I have stated in this report are honest and true and that the opinions I have expressed are correct to the best of my judgement. The fee for this report is not conditional upon the outcome of the case in any way whatsoever.



P.M. Hadfield, 11 April 2024

Director www.philhadfield.co.uk

Visiting Senior Research Associate, Centre for Criminal Justice Studies

School of Law,

University of Leeds

Appendix: Professional biography of the author (April, 2024)

Dr. Phil Hadfield is a Social Scientist and Director of www.philhadfield.co.uk an Independent Research Consultancy based in Leeds. Phil's work addresses research / data needs, problem-solving and cost v benefit analysis for clients in urban cultural planning, place management, community safety, public health and regulatory matters, with special reference to Evening and Night-time Economies (ENTE).

Phil has a background in academia (Criminology) and Research Council / NGO-funded projects. He holds (or has held) Advisory Board / Steering Group roles at the University of Leeds, London School of Hygiene & Tropical Medicine, the Institute of Alcohol Studies and the City of Bordeaux. He is on the International Editorial Board of the journal Contemporary Drug Problems.

Phil has advised many Licensing Authorities, notably the City of Westminster, Camden, Hackney, Liverpool, and the City of London on their licensing policies, together with contributions to the City of Sydney, 'Open Sydney' research Programme and three EC-funded Pan-European Research Programmes. He recently gave expert evidence in respect of the licensing of CO-OP Live, Manchester, the UK's largest indoor live music arena outside of London.

He is the author or co-author of some of the leading (highest citation) books and research articles on the ENTE. Through his work as an Expert Witness, Phil has considerable practical experience of evidence-gathering and decision-making processes within a UK licensing framework.

Key recent projects:

The London Night-Time Data Observatory

In 2021, Phil worked in collaboration with Arcola Research LLP and the Greater London Authority (GLA) to develop a data-monitoring tool, producing outputs that can inform the future of nightlife policy across the Capital. 'Safety' is one of four 'Dashboard

Indicators' of the Observatory now used to monitor the 'health' of London's ENTE.

The first iteration of the London Night-Time Observatory has been launched here: <https://data.london.gov.uk/night-time-observatory/>

Premises History**Appendix 4**

Application	Details of Application	Date Determined	Decision
05/12537/LIPN	Application for a new premises licence	26.01.2006	Granted by Licensing Sub Committee
06/01151/LIPV	Application to vary premises licence	09.03.2006	Granted by Licensing Sub Committee
06/06136/LIPDPS	Variation of DPS	18.07.2006	Granted under delegated authority
07/00552/LIPDPS	Variation of DPS	08.02.2007	Granted under delegated authority
07/02659/LIPDPS	Variation of DPS	15.03.2007	Granted under delegated authority
07/04893/LIPDPS	Variation of DPS	05.04.2007	Granted under delegated authority
07/04896/LIPDPS	Variation of DPS	05.04.2007	Granted under delegated authority
07/06768/LIPV	Application to vary premises licence	06.12.2007	Granted by Licensing Sub Committee
08/01666/LIPDPS	Variation of DPS	21.12.2007	Granted under delegated authority
08/01664/LIPDPS	Variation of DPS	25.02.2008	Granted under delegated authority
08/04806/LIPDPS	Variation of DPS	07.07.2008	Granted under delegated authority
08/04811/LIPDPS	Variation of DPS	07.07.2008	Granted under delegated authority
08/05590/LIPDPS	Variation of DPS	07.07.2008	Granted under delegated authority

08/05610/LIPDPS	Variation of DPS	07.07.2008	Granted under delegated authority
08/06238/LIPDPS	Variation of DPS	07.07.2008	Granted under delegated authority
08/06268/LIPDPS	Variation of DPS	07.07.2008	Granted under delegated authority
08/06382/LIPDPS	Variation of DPS	07.07.2008	Granted under delegated authority
08/06390/LIPDPS	Variation of DPS	07.07.2008	Granted under delegated authority
09/01846/LIPDPS	Variation of DPS	13.05.2009	Granted under delegated authority
09/01929/LIPDPS	Variation of DPS	13.05.2009	Granted under delegated authority
09/04869/LIPDPS	Variation of DPS	30.07.2009	Granted under delegated authority
09/04874/LIPDPS	Variation of DPS	30.07.2009	Granted under delegated authority
09/06108/LIPDPS	Variation of DPS	12.10.2009	Granted under delegated authority
09/06118/LIPDPS	Variation of DPS	12.10.2009	Granted under delegated authority
10/03918/LIPDPS	Variation of DPS	06.07.2010	Granted under delegated authority
17/04868/LIPDPS	Variation of DPS	01.06.2017	Granted under delegated authority
19/10315/LIPN	Time limited premises licence until 9 January 2022. Permits licensable activities from November to January each year	03.10.2019	Granted under delegated authority

20/10863/PREAPM	Request for Pre application advice	17.12.2020	N/A
21/01035/LIPN	Euro 2020 Fan Zone. Time limited premises licence from 1 June 2021 to 12 July 2021.	22.04.2021	Granted by Licensing Sub Committee
21/05276/LIPDPS	Variation of DPS	23.06.2021	Granted under delegated authority
21/11109/LIPN	“Lets do London” New Year’s Eve event. Time limited premises licence from 30 December 2021 to 02 January 2022.	02.12.2021	Granted by Licensing Sub Committee
22/04080/LIPN	UEFA Women’s EURO 2022 football tournament 21.07.2022 to 01.08.2022	22.04.2021	Granted by Licensing Sub Committee
22/09047/LIPN	Christmas in Trafalgar Square event 11.11.2022 to 02.01.2023	01.11.2022	Granted under delegated authority
23/05794/LIPN	Christmas in Trafalgar Square event 10.11.2023 to 02.01.2024	05.10.2023	Granted under delegated authority
23/09043/PREAPM	Request for Pre application advice	29.01.2024	N/A

Temporary Event Notices	Date of Event	Activities/Hours	Decision
19/16024/LITENN	07.12.2019 – 08.12.2019	Regulated entertainment and late night refreshment– 17:00 to 06:30	Event permitted
19/16126/LITENP	07.12.2019 – 08.12.2019	Late night refreshment– 23:00 to 02:00	Event permitted

There is no appeal history

CONDITIONS CONSISTENT WITH THE OPERATING SCHEDULE AND CONDITIONS PROPOSED BY A PARTY TO THE HEARING

When determining an application for a new premises licence under the provisions of the Licensing Act 2003, the licensing authority must, unless it decides to reject the application, grant the licence subject to the conditions which are indicated as mandatory in this schedule.

At a hearing the licensing authority may, in addition, and having regard to any representations received, grant the licence subject to such conditions which are consistent with the operating schedule submitted by the applicant as part of their application, or alter or omit these conditions, or add any new condition to such extent as the licensing authority considers necessary for the promotion of the licensing objectives.

This schedule lists those conditions which are consistent with the operating schedule, or proposed as necessary for the promotion of the licensing objectives by a responsible authority or an interested party as indicated. These conditions have not been submitted by the licensing service but reflect the positions of the applicant, responsible authority or interested party and have not necessarily been agreed

Mandatory Conditions

1. No supply of alcohol may be made at a time when there is no designated premises supervisor in respect of this licence.
2. No supply of alcohol may be made at a time when the designated premises supervisor does not hold a personal licence or the personal licence is suspended.
3. Every supply of alcohol under this licence must be made or authorised by a person who holds a personal licence.
4.
 - (1) The responsible person must ensure that staff on relevant premises do not carry out, arrange or participate in any irresponsible promotions in relation to the premises.
 - (2) In this paragraph, an irresponsible promotion means any one or more of the following activities, or substantially similar activities, carried on for the purpose of encouraging the sale or supply of alcohol for consumption on the premises—
 - (a) games or other activities which require or encourage, or are designed to require or encourage, individuals to;
 - (i) drink a quantity of alcohol within a time limit (other than to drink alcohol sold or supplied on the premises before the cessation of the period in which the responsible person is authorised to sell or supply alcohol), or
 - (ii) drink as much alcohol as possible (whether within a time limit or otherwise);
 - (b) provision of unlimited or unspecified quantities of alcohol free or for a fixed or discounted fee to the public or to a group defined by a particular characteristic in a manner which carries a significant risk of undermining a licensing objective;
 - (c) provision of free or discounted alcohol or any other thing as a prize to encourage or reward the purchase and consumption of alcohol over a period of 24 hours or

less in a manner which carries a significant risk of undermining a licensing objective;

- (d) selling or supplying alcohol in association with promotional posters or flyers on, or in the vicinity of, the premises which can reasonably be considered to condone, encourage or glamorise anti-social behaviour or to refer to the effects of drunkenness in any favourable manner;
 - (e) dispensing alcohol directly by one person into the mouth of another (other than where that other person is unable to drink without assistance by reason of a disability).
5. The responsible person must ensure that free potable water is provided on request to customers where it is reasonably available.
6. (1) The premises licence holder or club premises certificate holder must ensure that an age verification policy is adopted in respect of the premises in relation to the sale or supply of alcohol.
- (2) The designated premises supervisor in relation to the premises licence must ensure that the supply of alcohol at the premises is carried on in accordance with the age verification policy.
- (3) The policy must require individuals who appear to the responsible person to be under 18 years of age (or such older age as may be specified in the policy) to produce on request, before being served alcohol, identification bearing their photograph, date of birth and either—
- (a) a holographic mark, or
 - (b) an ultraviolet feature.
7. The responsible person must ensure that—
- (a) where any of the following alcoholic drinks is sold or supplied for consumption on the premises (other than alcoholic drinks sold or supplied having been made up in advance ready for sale or supply in a securely closed container) it is available to customers in the following measures—
 - (i) beer or cider: ½ pint;
 - (ii) gin, rum, vodka or whisky: 25 ml or 35 ml; and
 - (iii) still wine in a glass: 125 ml;
 - (b) these measures are displayed in a menu, price list or other printed material which is available to customers on the premises; and
 - (c) where a customer does not in relation to a sale of alcohol specify the quantity of alcohol to be sold, the customer is made aware that these measures are available.

A responsible person in relation to a licensed premises means the holder of the premise licence in respect of the premises, the designated premises supervisor (if any) or any individual aged 18 or over who is authorised by either the licence holder or designated premises supervisor. For premises with a club premises certificate, any member or officer of the club present on the premises in a capacity that which enables him to prevent the supply of alcohol.

8(i) A relevant person shall ensure that no alcohol is sold or supplied for consumption on or off the premises for a price which is less than the permitted price.

8(ii) For the purposes of the condition set out in paragraph 8(i) above -

(a) "duty" is to be construed in accordance with the Alcoholic Liquor Duties Act 1979;

(b) "permitted price" is the price found by applying the formula -

$$P = D + (D \times V)$$

Where -

(i) P is the permitted price,

(ii) D is the amount of duty chargeable in relation to the alcohol as if the duty were charged on the date of the sale or supply of the alcohol, and

(iii) V is the rate of value added tax chargeable in relation to the alcohol as if the value added tax were charged on the date of the sale or supply of the alcohol;

(c) "relevant person" means, in relation to premises in respect of which there is in force a premises licence -

(i) the holder of the premises licence,

(ii) the designated premises supervisor (if any) in respect of such a licence, or

(iii) the personal licence holder who makes or authorises a supply of alcohol under such a licence;

(d) "relevant person" means, in relation to premises in respect of which there is in force a club premises certificate, any member or officer of the club present on the premises in a capacity which enables the member or officer to prevent the supply in question; and

(e) "value added tax" means value added tax charged in accordance with the Value Added Tax Act 1994.

8(iii). Where the permitted price given by Paragraph 8(ii)(b) above would (apart from this paragraph) not be a whole number of pennies, the price given by that sub-paragraph shall be taken to be the price actually given by that sub-paragraph rounded up to the nearest penny.

8(iv). (1) Sub-paragraph 8(iv)(2) below applies where the permitted price given by Paragraph 8(ii)(b) above on a day ("the first day") would be different from the permitted price on the next day ("the second day") as a result of a change to the rate of duty or value added tax.

(2) The permitted price which would apply on the first day applies to sales or supplies of alcohol which take place before the expiry of the period of 14 days beginning on the second day.

9. Admission of children to the premises must be restricted in accordance with the film classification recommended by the British Board of Film Classification or recommended by this licensing authority as appropriate.

10. All persons guarding premises against unauthorised access or occupation or against

outbreaks of disorder or against damage (door supervisors) must be licensed by the Security Industry Authority.

Conditions consistent with the operating schedule

11. The licensable activity authorised by this licence and provided at the premises shall be ancillary to the main functions of the space as a cultural/sightseeing attraction where cultural events are staged.
12. The number of Licensable Event days will not exceed 40 in a calendar year. Licensable events shall mean any event involving licensable activity organised and managed by the Licence Holder. Rehearsals for Licensable Events may take place in addition to the 40 days, on approval with the LOSPG.

Rehearsals for Licensable Events may take place on a further 10 separate occasions. The Licence Holder will give advance notice to the members of the Trafalgar Square Neighbours

Group of the 10 Rehearsal days, such notice to include the approximate times for the sound checks.

Definitions:

Rehearsals shall mean a practice run-through of a Licensable Event in advance of the advertised staging of the actual Licensable Event.

15 Major Event Days may take place per calendar year.

A major event means:

- An event that requires a full road closure of any of the three surrounding roads:

- Pall Mall East

- Charing Cross Road/ Morley's Hill

- or South Side Trafalgar Square (also known as Charing Cross)

and/ or any event determined to be a major event by the LOSPG Planning Group at which a

member of the Environmental Health Consultation Team will be present.

13. Consultation with members of the Trafalgar Square Neighbours Group will be conducted quarterly per annum. Trafalgar Square Neighbours Group' is constituted by representatives invited from the National Gallery, National Portrait Gallery, Canada House, St-Martins-in-the- Fields, South African High Commission, Westminster City Council, the Metropolitan Police and any other premises within the vicinity, as appropriate.
14. Onsite contact details for an appropriate person, at the Greater London Authority to be provided to the Trafalgar Square Neighbours Group for all licensable events.
15. Alcohol will only be made available for sale or supply on 20 days per calendar year. For each of the 20 days the Licensing Authority will require 10 working days notice and the Metropolitan Police will have the right of veto.
16. When alcohol is to be provided, an alcohol management plan shall be provided to the LOSPG.
The plan for approval shall include:
 - (a) the exact location of the bars;
 - (b) the area/s set aside for alcohol consumption;
 - (c) the type of alcohol to be sold;
 - (d) any associated crowd management processes
 - (e) proposed serveware by risk assessment;
 - (f) the steps taken to uphold the Licensing Objectives

- (g) details of drinking water provisions
- (h) staff training

17. There shall be at least one personal licence holder on site during operational hours. Details of the personal licence holder (including name and contact number) shall be displayed in a prominent position on site.
18. The Premises Licence Holder shall ensure that alcohol is not allowed to be brought onto the Premises by members of the public, unless approved by the LOPSG.
19. The Premises Licence Holder shall ensure that no alcohol is allowed to be taken off the Premises by members of the public.
20. All events at which alcohol is sold shall be enclosed to prevent unauthorised access.
21. When alcohol is sold at the event the following conditions shall apply to all bars, both for the public and in hospitality areas:
 - a) Unless otherwise agreed with LOSPG bars shall close at least 15 minutes before the event finish time.
 - b) Bars shall not be permitted to run price promotions, happy hours or other promotions designed to encourage excessive drinking.
 - c) Drinks shall not be served in glass vessels or containers. A risk assessment shall be conducted if cans are proposed and the suitability should be agreed with the LOSPG.
22. Food and non-intoxicating beverages, including drinking water, shall be available in all parts of the premises where alcohol is sold or supplied for consumption on the premises.
23. The use of this licence shall be agreed through the Licensing, Operational and Safety Planning Group (LOSPG) process and shall have had 'no objection' raised by the representatives on the LOSPG.
24. The Licensing, Operational and Safety Planning Group (LOPSG) shall be chaired by a representative of the Westminster City Council's City Promotions, Events and Filming team.
25. Membership of the Licensing, Operational and Safety Planning Group (LOSPG) shall normally consist of invited representatives of the designated event organiser, the Metropolitan Police Service, Officers of the Westminster City Council, the Environmental Health Consultation Team, London Ambulance Service, London Fire Brigade, Transport for London and any other appropriate and specialist advisor as required by the chairman of the LOSPG to achieve 'no objection' and to meet the objectives of the Licensing Act.
26. The Premises Licence Holder shall comply with all reasonable requirements of Westminster City Council, Westminster Police Licensing Team, Westminster City Council's Environmental Health Consultation Team, Westminster City Council's City Promotions, Events and Filming Team, the London Fire Brigade and the Metropolitan Police Service.
27. Unless otherwise agreed with LOSPG, an Event Management Plan must be provided to the LOSPG for events where:
 - (i) an event with an enclosed public area within Trafalgar Square;
 - (ii) determined to be a major event as detailed in this licence;
 - (iii) for any other event where an Event Management Plan is required by the LOSPG
28. Licence holder must ensure the Event Management Plan is presented to the members

of the LOSPG for their comments. If requested, the Event Management Plan shall include but not be limited to the following:-

- a. Alcohol Management Plan (if appropriate)
- b. Access Management Plan;
- c. Adverse Weather Plan;
- d. Cancellation Procedure;
- e. CCTV Plan;
- f. Communications Plan;
- g. Child & Vulnerable Adults Policy;
- h. Crowd Management Plan (including Security and Stewarding Plan);
- i. Egress Management Plan;
- j. Emergency and Evacuation procedures;
- k. Event Control Statement of Intent;
- l. Event Medical Plan;
- m. Event Safety Plan including Risk Assessment;
- n. Fire Safety Management Plan;
- o. Ingress Management Plan;
- p. Lighting Plan;
- q. Noise Management Plan;
- r. Public Liability Insurance;
- s. Safeguarding Policy; Child & Vulnerable Adults Policy & Protection of Women & Girls;
- t. Sanitary Provisions
- u. Security and Crime Reduction Plan; including overnight security arrangements
- v. Site Plans (showing all permanent and temporary structures and all access and egress points);
- w. Sustainability Statement;
- x. Terms and Conditions of Entry;
- y. Trader Food Management Plan;
- z. Certificates from competent persons on Structures, Electrical Power Supply and Gas equipment (including LPG)
- aa. Transport Assessment;
- bb. Waste Management Plan.
- cc. Road Closure plan/Traffic Management Plan

29. So far as is reasonably practicable the Premises Licence Holder shall ensure that the event is run in accordance with the Event Management Plan.
30. If required by LOSPG, the Premises Licence Holder shall arrange an event debrief after each event day at a time agreed with LOSPG.
31. Flashing or particularly bright lights on or outside the premises shall not cause a nuisance to nearby properties (save insofar as they are necessary for the prevention of crime or public safety).
32. No fumes, steam or odours shall be emitted from the licensed area so as to cause a nuisance to any persons living or carrying on business in the area where the premises are situated.
33. A sufficient number of easily identifiable, readily accessible receptacles for refuse must be provided, including provisions for concessions. Arrangements must be made for regular collection. Public areas must be kept clear of refuse and other combustible waste prior to, and so far as is reasonably practicable, during the licensed event.
34. The licensee shall ensure that the highway and public spaces in the vicinity of the premises are kept free of litter from the premises to the satisfaction of the Westminster City Council. The highway in the vicinity of the premises shall be swept at regular

intervals and at the close of business. All litter and sweepings collected and stored in the accordance with the approved refuse storage arrangements. Vicinity shall include the highway to each side of Trafalgar Square to a minimum distance of 50 metres.

35. If requested by the LOSPG, a Noise Management Plan to promote the prevention of public nuisance shall be provided to Westminster City Council's Environmental Health Consultation Team for approval. The Noise Management Plan will be provided a minimum of 28 days prior to the event. The Noise Management Plan shall state the maximum permitted music noise level applicable at the nearest noise sensitive premises. Once approved in writing it shall be implemented by the Premises Licence Holder.
36. The Licensee will take all reasonable steps to ensure that amplified music will not cause a nuisance.
37. The following noise conditions shall apply to events with regulated entertainment:
 - (a) A noise control consultant shall be appointed, who shall liaise between all parties including the Licence Holder, promoter, sound system supplier, sound engineer and the Environmental Health Consultation Team on all matters relating to noise control prior to the event.
 - (b) For the purposes of monitoring music noise levels during the event and sound check, the noise control consultant shall contact the Environmental Health Consultation Team and agree noise sensitive locations which are to be used to monitor compliance with conditions (d) and (e).
 - (c) If deemed necessary a noise propagation test shall be undertaken in consultation with representative(s) of the Environmental Health Consultation Team prior to each Major Event in order to set appropriate control limits at the sound mixer position. The sound system shall be configured and operated in a similar manner as intended for the event. The sound source used for the test shall be similar in character to the music likely to be produced during the event.
 - (d) The stage shall only face north. The control limits set at the mixer position shall be adequate to ensure that the Music Noise Level shall not at 1 metre from the façade of any noise sensitive premises exceed 79 dB(A) over a 5-minute period throughout the duration of the event
 - (e) Rehearsal and sound check times shall be limited between the hours of 08:00 and 18:00. Notification of the time(s) and duration of sound checks shall be provided to the Environmental Health Consultation Team at least 24 hours beforehand. There shall be no publicity of rehearsals. The total number of hours cumulatively for rehearsals will amount to no more than 50 hours in any calendar year. Rehearsals will be inaudible one metre from the nearest noise sensitive premises between 08:00 and 12:00 and from 14:00 to 17:00 Monday to Friday.
 - (f) The promoter, system supplier and all individual sound engineers shall be informed of the sound control limits and that any instructions from the noise control consultant regarding noise levels shall be implemented.
 - (g) A communications link should be provided to enable condition (f) above to be complied with and any numbers shall be made available to the Environmental Health Consultation Team prior to the event starting.
 - (h) The appointed noise control consultant/or appointed person shall continuously monitor noise levels and advise the sound engineer accordingly to ensure that the noise limits are not exceeded. The Environmental Health Consultation Team shall have access to the results of the noise monitoring at all times. The Environmental Health Consultation Team shall have access and facilities to enable them to carry out their own monitoring.
 - (i) The speakers must be located to the satisfaction of the Environmental Health Consultation Team.
 - (j) Residential properties and the relevant amenity group(s) in the immediate vicinity of the

Square will be contacted as soon as reasonable practicable prior to any Major Event/Music Event advising them of the times of the Event and any sound check or rehearsal times and giving them a telephone number to contact in the event that they have any complaints.

(k) The report detailing the results of the monitoring shall be made available on request to the members of the LOSPG or Trafalgar Square Neighbours Group if requested.

38. There shall be no noise (audible above background noise) at the facade of the nearest building, from any construction or similar works in association with the set-up and breakdown of the site, outside the hours of:
 - 08:00-18:00 Monday to Friday
 - 08:00- 13:00 Saturday
 - No noisy work can be carried out on Sundays, bank holidays and public holidays. Noisy work must not take place outside these hours unless otherwise agreed through an out of hours (OOH) approval (up to three consecutive days) or a Control of Pollution Act 1974 section 61 prior consent in special circumstances (for works longer than 3 consecutive days).
39. Any generators, refrigerators or other machinery running overnight will be silenced, screened or sited so they do not create noise (audible above background levels) at the facade of the nearest building
40. Notices shall be prominently displayed at all exits requesting patrons to respect the needs of local residents and businesses and leave the area quietly.
41. The Premises Licence Holder shall carry out the sanitary provision analysis using the event safety guide as the basis for determining the sanitation facilities required. The minimum number of facilities will be included in the Event Management Plan together with details of the maintenance and servicing of sanitary accommodation.
42. Any special effects or mechanical installations shall be arranged, operated and stored so as to minimise any risk to the safety of those using the premises. The following special effects will only be used on 10 days prior notice being given to the licensing authority where consent has not previously been given.
 1. dry ice and cryogenic fog
 2. smoke machines and fog generators
 3. pyrotechnics including fireworks
 4. firearms
 5. lasers
 6. explosives and highly flammable substances.
 7. real flame.
 8. strobe lighting.
43. No person shall give at the premises any exhibition, demonstration or performance of hypnotism, mesmerism or any similar act or process which produces or is intended to produce in any other person any form of induced sleep or trance in which susceptibility of the mind of that person to suggestion or direction is increased or intended to be increased. NOTE: (1) This rule does not apply to exhibitions given under the provisions of Section 2(1A) and 5 of the Hypnotism Act 1952.
44. The approved arrangements at the premises, including means of escape provisions, emergency warning equipment, the electrical installation and mechanical equipment, shall at all material times be maintained in good condition and full working order.
45. The means of escape provided for the premises shall be maintained unobstructed, free of trip hazards, be immediately available and clearly identified in accordance with the plans provided.

46. All emergency exit doors shall be available at all material times without the use of a key, code, card or similar means.
47. Emergency exits and entrances to the event area must be kept clear at all times and must be provided with clearly visible signage.
48. All parts of the licensed area intended to be used in the absence of adequate daylight and all essential safety signage shall be suitably illuminable. Details of the locations and level of illumination must be submitted to the LOSPG or their authorised representative.
49. The edges of the treads of steps and stairways shall be maintained so as to be conspicuous.
50. Curtains and hangings shall be arranged so as not to obstruct emergency safety signs or emergency equipment.
51. All fabrics, curtains, drapes and similar features including materials used in finishing and furnishing shall be either non-combustible or be durably or inherently flame-retarded fabric. Any fabrics used in escape routes, entertainment areas, shall be non-combustible. All fabric, including curtains and drapes used on stage for tents and marquees, or plastic and weather sheeting, shall be inherently or durably flame retardant to the relevant British Standards. Certificates of compliance must be available upon request by an authorised officer of Westminster City Council, The London Fire Brigade.
52. Any moving flown equipment must contain a device or method whereby failure in the lifting system would not allow the load to fall. All hung scenery and equipment must be provided with a minimum of two securely fixed independent suspensions such that in the event of failure of one suspension the load shall be safely sustained.
53. The certificates listed below shall be submitted to the licensing authority upon written request:
 - Any permanent or temporary emergency lighting battery or system
 - Any permanent or temporary electrical installation
 - Any permanent or temporary emergency warning system
54. Electrical generators, where used, must be:
 - Suitably located clear of buildings, marquees and structures, and free from flammable materials;
 - Enclosed to prevent unauthorised access;
 - Able to provide power for the duration of the event;
 - Backed up electrical generators are to be provided to power essential communications, lighting and safety systems in the event of primary generator failure.
55. Details of all marquees, tented structures and temporary structures should be provided including emergency exits and signage, fire warning and fire fighting equipment.
56. Full structural design details and calculations of all and any structures to be erected within the licensed area must be submitted to the Westminster City Council Building Control. A certificate from a competent person or engineer that a completed structure has been erected in accordance with the structural drawings and design specification must be available for inspection prior to a relevant structure being used during the licensed event.
57. The Premises Licence Holder must ensure that competent persons are employed to assess the electrical requirements at the event and the compatibility of the electricity

supply with the equipment to be used. Appropriate safety devices (such as 30mA Residual Current Devices at Source) must be used for electrical apparatus, particularly for any electrical equipment exposed to adverse conditions or electrical equipment to be used in association with hand held devices (e.g. microphones). The competent person must make a certificate of inspection of the electrical installation available for inspection.

58. All spare fuel, including LPG, must be kept and stored safely in accordance with relevant Health and Safety legislation and suitable safety signage and fire fighting equipment provided. No non-emergency vehicles shall be operated within the premises during an event.
59. No non-emergency vehicles shall be operated within the premises during an event.
60. When alcohol is sold at the Premises Licence Holder shall install a comprehensive CCTV system on site in accordance with the CCTV Plan agreed with LOSPG and in particular with the MPS. The CCTV system shall continually record whilst the premises is open for licensable activities and during all times when customers remain on the premises. A staff member from the premises who is conversant with the operation of the CCTV system shall be on the premises at all times when the premises is open to the public. This staff member must be able to provide a Police or authorised Westminster City Council officer copies of recent CCTV images or data with the minimum of delay when requested. All recordings shall be stored for a minimum period of 31 days with date and time stamping, and recordings should be made available upon the request of Police or authorised officer as soon as reasonable practicable throughout the entire 31 day period.
61. The bars shall close immediately on the direction of the senior police officer engaged on the event. In the event of disorder or injury to any person due to the presence of plastic bottles or cans, the senior police officer present can direct the immediate cessation of alcohol served in plastic bottles or cans whilst the risk is still present.
62. The Premises Licence Holder shall produce a security stewarding plan which will detail the qualification, training and deployment of SIA security and stewards. The positioning of staff will be based on a risk assessment process.
63. Adequate stewarding within the licensed area must be provided at all times during the licensed event.
64. All security staff will be identifiable in uniform and will display their name badges by way of a reflective armband or lanyard.
65. Twenty-four hour Security Industry Authority (SIA) approved security to be provided on site from the night when equipment first arrives until removed.
66. Unless police approval is given otherwise, stewards shall monitor all entry and egress points throughout the day of an event. Such monitoring shall include:
 - (a) (i) Persons entering the premises shall be told by stewards and security to decant all alcohol into recyclable cups supplied. Signage at all points of entry shall re-enforce this message of not bringing alcohol onto the premises unless it has been decanted. Persons refusing to decant alcohol shall not be admitted to the premises.
 - (ii) Persons attempting to leave the premises with alcohol shall be advised by stewards and security that they are about to enter a designated "no drinking zone", and should not leave the premises with alcohol. Signage at all points of exit shall re-enforce this message of not taking alcohol from the premises. Those refusing to comply shall be warned that police officers might intervene to prevent them breaking the law.
 - (b) The numbers of stewards at each entry and egress point shall be continuously reassessed throughout the day in consultation with the relevant senior police officer on

duty for the event or relevant area of the event.

(c) All stewards shall wear readily identifiable tabards.

67. An incident log shall be kept at the premises on event days whilst the premises is open, and made available on request to an authorised officer of the Westminster City Council or the Police. It must be completed within 24 hours of the incident and will record the following:
1. all crimes reported to the venue
 2. all ejections of patrons
 3. any complaints received concerning crime and disorder
 4. any incidents of disorder
 5. all seizures of drugs or offensive weapons
 6. any refusal of the sale of alcohol
 7. any formal visit by a relevant authority or emergency service.
68. A record shall be kept detailing all refused sales of alcohol. The record should include the date and time of the refused sale and the name of the member of staff who refused the sale. The record shall be available for inspection at the premises by the police or an authorised officer of the Westminster City Council at all times whilst the premises is open.
69. A Challenge 25 proof of age scheme shall be operated at the premises where the only acceptable forms of identification are recognised photographic identification cards, such as a driving licence, passport or proof of age card with the PASS Hologram.
70. Posters will be displayed on site in the bar area and point of sale, which refer to the challenge 25 policy and to advise that suitable proof of age will be required for the purposes of the supply of alcohol.
71. Age restricted films shall not be shown in the presence of children.
72. The Safeguarding Policy will include details of the welfare provision for the support of children and vulnerable adults and protection of Women and Girls. All welfare staff will be appropriately trained and certified.
73. The Premises Licence Holder shall produce and implement a child or vulnerable persons policy which will include provision for children or vulnerable persons found or reported missing. This will be included in the safeguarding policy.
74. The Premises Licence Holder shall appoint one person as responsible for safeguarding on site to coordinate safeguarding measures.
75. A welfare area will be provided to coordinate all welfare safeguarding activities.
76. If required by LOSPG, external security teams will patrol the event perimeter and a security response team will operate in the immediate area around the site.

Conditions proposed by the Environmental Health

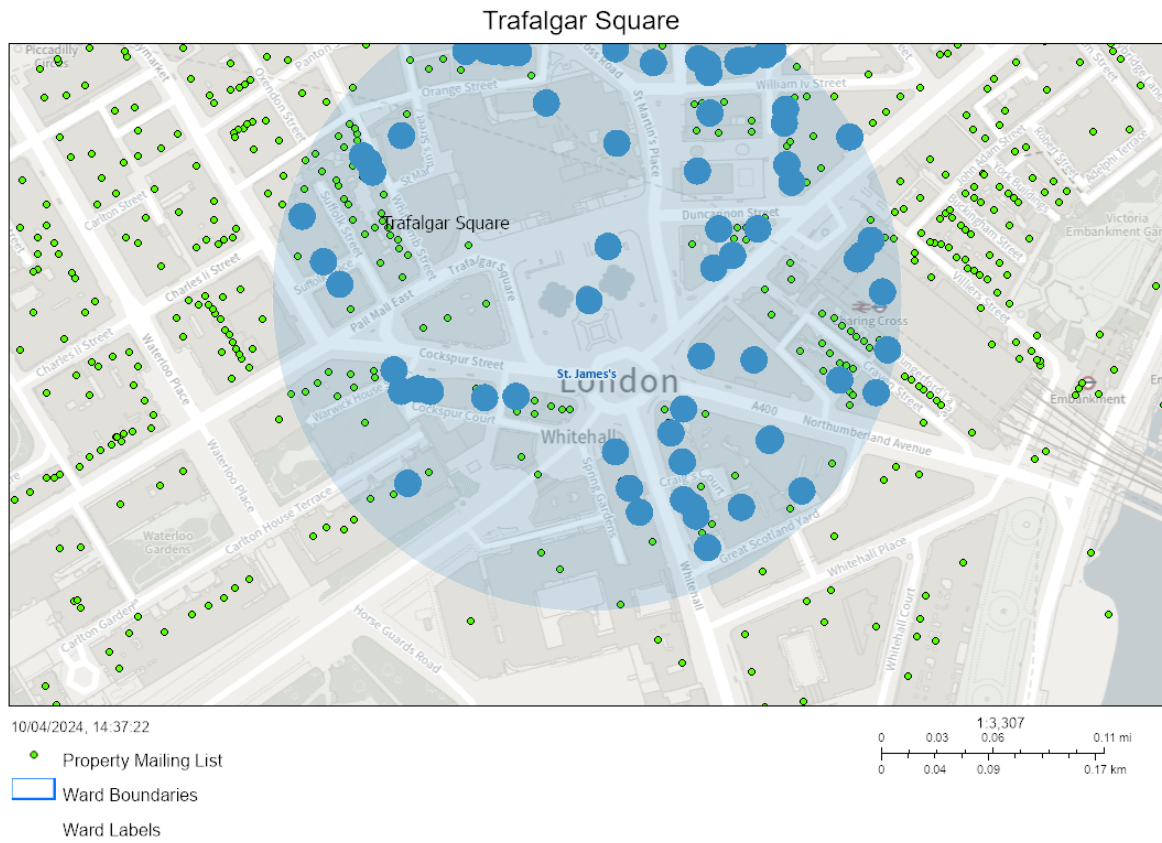
77. No licensable activities shall take place at the premises until premises licence 17/04868/LIPDPS (or such other number subsequently issued for the premises) has been surrendered [and is incapable of resurrection].
78. Add to the end of condition 12 (above):
The LOSPG (Licensing, Operational Safety Planning Group) is a multi-agency group chaired by Westminster City Council to review safety plans for events. For the purpose of this licence a reference to the LOSPG can also include:

- a. Safety Advisory Group (SAG) or;
- b. Other terms as deemed appropriate for the group that reviews safety plans for relevant events authorised under this licence.

79. The maximum capacity shall not exceed 19,999 people at any one time, each event will need to its own safe capacity to be determined and then agreed by the LOSPG.

80. To integrate into condition 18: Unless otherwise agreed with LOSPG, no later than 2 months prior to the event the Premises Licence holder must ensure the Event Management Plan is presented to the members of the LOSPG for their comments. Discussion should begin a minimum of 6 months before or at the first known date. If requested, the Event Management Plan shall include but not be limited to the following...

81. If requested by the LOSPG, a Noise Management Plan to promote the prevention of public nuisance shall be provided to Westminster City Council's Environmental Health Consultation Team for approval. The Noise Management Plan will be provided a minimum of 28 days prior to the event. The Noise Management Plan shall state the maximum permitted music noise level applicable at the nearest noise sensitive premises. Once approved in writing it shall be implemented by the Premises Licence Holder.



Resident Count: 376

Licensed premises within 250m of Open Space At				
Licence Number	Trading Name	Address	Premises Type	Time Period
22/04080/LIPN	Womens EURO 2022 Fan Zone	Open Space At Trafalgar Square London WC2N 5DS	Park / Open Space	Sunday; 11:00 - 23:30 Monday to Sunday; 11:00 - 22:30
21/05276/LIPDPS	EURO 2020 Trafalgar Square Fan Zone	Open Space At Trafalgar Square London WC2N 5DS	Park / Open Space	Monday to Sunday; 11:00 - 23:00
17/04873/LIPDPS	Cafe On The Square	Cafe On The Square Trafalgar Square London WC2N 5DS	Restaurant	Monday to Sunday; 08:00 - 20:00
24/01573/LIPDPS	The Admiralty	66 Trafalgar Square London WC2N	Public house or pub restaurant	Sunday; 07:00 - 00:00 Monday to Saturday;

		5DS		07:00 - 01:00
23/01073/LIPDPS	Waterstones	Basement And Ground Floor Grand Buildings Trafalgar Square London WC2N 5EL	Shop	Monday to Sunday; 08:00 - 23:30
22/10726/LIPDPS	Tortilla	460 Strand London WC2R 0RG	Restaurant	Sunday; 12:00 - 22:30 Monday to Thursday; 10:00 - 23:30 Friday to Saturday; 10:00 - 00:00
23/05322/LIPDPS	The Trafalgar Hotel	2 Spring Gardens London SW1A 2TS	Hotel, 4+ star or major chain	Monday to Sunday; 00:00 - 00:00
20/10540/LIPCH	Halfway II Heaven	7 Duncannon Street London WC2N 4JF	Wine bar	Sunday; 10:00 - 23:30 Monday to Thursday; 10:00 - 01:30 Friday to Saturday; 10:00 - 03:30
22/01080/LIPVM	Sambuca	3 Northumberland Avenue London WC2N 5BW	Restaurant	Monday to Sunday; 07:00 - 00:30
23/07847/LIPCH	Caffe Concerto	Ground Floor 4 - 5 Northumberland Avenue London WC2N 5BW	Cafe	Monday to Sunday; 07:00 - 23:30
22/10685/LIPDPS	Tesco Express (03482)	1 - 4 Charing Cross London SW1A 2DR	Shop	Monday to Sunday; 08:00 - 05:00
21/12718/LIPDPS	Co-Operative The Strand	Basement To Ground And Mezzanine Floor 456 - 459 Strand London WC2R 0RG	Shop (large)	Monday to Sunday; 00:00 - 00:00
18/15530/LIPDPS	The National Gallery	Concession 3 Trafalgar Square London WC2N 5DN	Museums & Art Galleries	Monday; 00:00 - XXXX Tuesday; 00:00 - XXXX Wednesday; 00:00 - XXXX Thursday; 00:00 - XXXX Friday; 00:00 - XXXX

				Saturday; 00:00 - XXXX Sunday; 00:00 - XXXX
17/04868/LIPDPS	Trafalgar Square	Concession 3 Trafalgar Square London WC2N 5DN	Park / Open Space	Monday to Sunday; 00:00 - 00:00
17/08394/LIPDPS	Drummonds	49 Charing Cross London SW1A 2DX	Banks and Building Societies	Monday to Sunday; 00:00 - 00:00
23/02983/LIPDPS	Little Sicily	7 Whitehall London SW1A 2DD	Restaurant	Sunday; 08:00 - 00:00 Monday to Saturday; 08:00 - 00:30
22/05082/LIPDPS	Courtyard Market	St Martin-In-The-Fields Church St Martin's Place London WC2N 4JJ	Markets (other than livestock)	Sunday; 12:00 - 23:00 Monday to Saturday; 09:00 - 03:00
22/03661/LIPDPS	PREZZO RESTAURANT	Basement And Ground Floor Unit D Grand Buildings Northumberland Avenue London WC2N 5HR	Not Recorded	Sunday; 12:00 - 23:30 Monday to Saturday; 12:00 - 00:00
22/10949/LIPN	Not Recorded	25 Cockspur Street London SW1Y 5BN	Restaurant	Monday to Sunday; 10:00 - 00:30
23/05016/LIPV	Gouqi	25 Cockspur Street London SW1Y 5BN	Restaurant	Monday; 10:00 - 00:30 Tuesday; 10:00 - 00:30 Wednesday; 10:00 - 00:30 Thursday; 10:00 - 00:30 Friday; 10:00 - 00:30 Saturday; 10:00 - 00:30 Sunday; 10:00 - 00:30
21/11903/LIPDPS	PizzaExpress	450 - 452 Strand London WC2R 0RG	Restaurant	Sunday; 12:00 - 00:00 Monday to Saturday; 10:00 - 00:30
22/05882/LIPCH	Walkers Of Whitehall	Basement And Ground Floor 15 Whitehall London SW1A 2DD	Pub or pub restaurant with lodge	Sunday; 10:00 - 00:00 Sunday; 10:00 - 22:30 Monday to Thursday; 10:00 - 23:30 Monday to Saturday; 10:00 - 01:00 Friday to Saturday; 10:00 -

				00:00 Sundays before Bank Holidays; 10:00 - 00:00
23/04402/LIPCH	Thai Square	Ground Floor Norway House 21 - 24 Cockspur Street London SW1Y 5BN	Restaurant	Sunday; 10:00 - 01:00 Monday to Saturday; 10:00 - 01:30
23/04401/LIPCH	Thai Square Club	Basement Norway House 21 - 24 Cockspur Street London SW1Y 5BN	Night clubs and discos	Sunday; 10:00 - 03:00 Monday to Saturday; 10:00 - 03:30
22/09486/LIPDPS	Trafalgar Theatre	Whitehall Theatre 14 Whitehall London SW1A 2DY	Theatre	Monday; 09:00 - 02:30 Tuesday; 09:00 - 02:30 Wednesday; 09:00 - 02:30 Thursday; 09:00 - 02:30 Friday; 09:00 - 02:30 Saturday; 09:00 - 02:30 Sunday; 09:00 - 02:30
23/02621/LIPN	Not Recorded	National Portrait Gallery 2 St Martin's Place London WC2H 0HE	Cafe	Monday to Sunday; 08:00 - 01:00
23/07437/LIPDPS	Searcys At The National Portrait Gallery, Fourth Floor Rest	National Portrait Gallery 2 St Martin's Place London WC2H 0HE	Restaurant	Monday to Sunday; 08:00 - 00:00
19/06716/LIPDPS	National Portrait Gallery	National Portrait Gallery 2 St Martin's Place London WC2H 0HE	Museums & Art Galleries	Monday to Sunday; 08:00 - 01:00
21/04174/LIPDPS	Not Recorded	20 Cockspur Street London SW1Y 5BL	Office	Monday to Sunday; 00:00 - 00:00
10/09129/LIPRW	Two Chairmen Public House	1 Warwick House Street London SW1Y 5AT	Public house or pub restaurant	Sunday; 09:00 - 23:00 Monday to Thursday; 09:00 - 23:30 Friday to Saturday; 09:00 - 00:30
14/09447/LIPN	Two Chairmen Public House	1 Warwick House Street London SW1Y 5AT	Public house or pub restaurant	Sunday; 09:00 - 23:00 Monday to Thursday; 09:00 - 00:00 Friday to

				Saturday; 09:00 - 00:30
20/08789/LIPDPS	Page 8	7 - 8 St Martin's Place London WC2N 4HA	Not Recorded	Sunday; 08:00 - 23:00 Monday to Thursday; 08:00 - 00:00 Monday to Sunday; 00:00 - 00:00 Friday to Saturday; 08:00 - 00:30
22/11227/LIPT	Bisushima	7 - 8 St Martin's Place London WC2N 4HA	Hotel, 4+ star or major chain	Monday; 08:00 - 01:00 Tuesday; 08:00 - 01:00 Wednesday; 08:00 - 01:00 Thursday; 08:00 - 01:00 Friday; 08:00 - 01:00 Saturday; 08:00 - 01:00 Sunday; 08:00 - 01:00
23/01806/LIPDPS	The Horse And Guardsman	Ground 16 - 18 Whitehall London SW1A 2DY	Pub or pub restaurant with lodge	Sunday; 07:00 - 23:30 Monday to Thursday; 07:00 - 00:00 Friday to Saturday; 07:00 - 00:30
24/00460/LIPVM	The Silver Cross Public House	33 Whitehall London SW1A 2BX	Public house or pub restaurant	Monday; 07:00 - 00:30 Tuesday; 07:00 - 00:30 Wednesday; 07:00 - 00:30 Thursday; 07:00 - 00:30 Friday; 07:00 - 00:30 Sunday; 07:00 - 00:00
19/05295/LIPV	50 Kalo Di Ciro Salvo	7 Northumberland Avenue London WC2N 5BY	Restaurant	Friday to Saturday; 10:00 - 00:30 Sunday to Thursday; 10:00 - 00:00
20/03388/LIPV	Not Recorded	Concession - Basement And Ground Floor 8 Northumberland Avenue London WC2N 5BY	Wine bar	Monday; 07:00 - 02:30 Tuesday; 07:00 - 02:30 Wednesday; 07:00 - 02:30 Thursday; 07:00 - 02:30 Friday; 07:00 - 02:30 Saturday; 07:00 - 02:30 Sunday; 07:00 - 02:30
18/07969/LIPN	Not Recorded	Concession - Basement And	Wine bar	Monday to Sunday; 07:00 -

		Ground Floor 8 Northumberland Avenue London WC2N 5BY		02:30
07/04070/WCCMAP	Club Quarters, Trafalgar Square	8 Northumberland Avenue London WC2N 5BW	Hotel, 4+ star or major chain	Monday to Sunday; 00:00 - 00:00
11/07189/LIPV	Basement & Ground Floors	8 Northumberland Avenue London WC2N 5BW	Hotel, 4+ star or major chain	Monday to Sunday; 07:00 - 02:30
23/01198/LIPDPS	Marugame Udon	449 Strand London WC2R 0QU	Restaurant	Sunday; 09:00 - 23:00 Monday to Thursday; 09:00 - 00:00 Friday to Saturday; 09:00 - 00:30
22/04355/LIPCH	Old Shades	Old Shades 37 Whitehall London SW1A 2BX	Pub or pub restaurant with lodge	Sunday; 10:00 - 23:30 Monday to Saturday; 10:00 - 00:30
23/04708/LIPVM	Subway	3 Adelaide Street WC2N 4HZ	Takeaway food outlet	Monday; 00:00 - 00:00 Tuesday; 00:00 - 00:00 Wednesday; 00:00 - 00:00 Thursday; 00:00 - 00:00 Friday; 00:00 - 00:00 Saturday; 00:00 - 00:00 Sunday; 00:00 - 00:00
21/01335/LIPT	Prezzo	Ground 10 St Martin's Place London WC2N 4JL	Wine bar	Sunday; 09:00 - 23:00 Monday to Saturday; 09:00 - 02:30
23/07891/LIPCH	Caffe Concerto	43 Whitehall London SW1A 2BX	Restaurant	Monday to Sunday; 12:00 - 00:00
23/02887/LIPDPS	Thistle Trafalgar Square, The Royal Trafalgar	Royal Trafalgar Thistle Hotel Whitcomb Street London WC2H 7HG	Hotel, 4+ star or major chain	Sunday; 12:00 - 00:00 Monday to Saturday; 10:00 - 00:30
21/05450/LIPN	Bardo Restaurant	9 Suffolk Place London SW1Y 4HX	Restaurant	Saturday; 10:00 - 02:30 Sunday to Tuesday; 10:00 - 01:30
21/09656/LIPDPS	Mint Leaf	9 Suffolk Place London SW1Y	Office	Monday; 10:00 - 01:30 Tuesday;

		4HX		10:00 - 01:30 Wednesday; 10:00 - 01:30 Thursday; 10:00 - 01:30 Friday; 10:00 - 01:30 Saturday; 10:00 - 01:30 Sunday; 12:00 - 01:00
17/06985/LIPVM	Cheers One	Ground Floor 19 Whitcomb Street London WC2H 7HA	Shop	Sunday; 10:00 - 22:30 Monday to Saturday; 08:00 - 23:00
20/03372/LIDPSR	Arboretum Lounge	Cavell House 2A Charing Cross Road London WC2H 0HF	Miscellaneous	Sunday; 08:00 - 23:30 Monday to Thursday; 08:00 - 00:00 Friday to Saturday; 08:00 - 00:30
20/07148/LIPN	Steak Co	Basement Part And Ground Floor 11 - 13 Irving Street London WC2H 7AU	Restaurant	Sunday; 10:00 - 00:00 Monday to Saturday; 10:00 - 00:30
23/03307/LIPDPS	The Chandos Public House	29 St Martin's Lane London WC2N 4ER	Pub or pub restaurant with lodge	Sunday; 12:00 - 23:00 Monday to Saturday; 10:00 - 23:30
21/10644/LIPN	Not Recorded	Basement And Ground Floor 21 Whitcomb Street London WC2H 7HA	Not Recorded	Tuesday to Sunday; 09:00 - 19:30
20/09016/LIPT	Wagamama	14A Irving Street London WC2H 7AF	Restaurant	Sunday; 12:00 - 00:00 Monday to Saturday; 10:00 - 00:30
23/00947/LIPDPS	The Halal Guys	Basement And Ground Floor 14 - 15 Irving Street London WC2H 7AU	Restaurant	Monday; 10:00 - 23:30 Tuesday; 10:00 - 23:30 Wednesday; 10:00 - 23:30 Thursday; 10:00 - 23:30 Friday; 10:00 - 23:30 Saturday; 10:00 - 23:30 Sunday; 10:00 - 23:00
23/05226/LIPDPS	Mall Galleries	17 Carlton House Terrace London SW1Y 5AH	Museums & Art Galleries	Monday to Sunday; 10:00 - 17:00 Monday to Sunday; 11:00 - 00:30
23/06875/LIPDPS	Not Recorded	3 - 5 Great Scotland Yard	Not Recorded	Monday; 00:00 - 00:00 Tuesday;

		London SW1A 2HW		00:00 - 00:00 Wednesday; 00:00 - 00:00 Thursday; 00:00 - 00:00 Friday; 00:00 - 00:00 Saturday; 00:00 - 00:00 Sunday; 00:00 - 00:00
23/09055/LIPRW	Fatto A Mano	30 St Martin's Lane London WC2N 4ER	Restaurant	Sunday; 12:00 - 00:00 Monday to Saturday; 10:00 - 00:30
18/05907/LIPDPS	Bancone	39 William Iv Street London WC2N 4DD	Restaurant	Sunday; 12:00 - 00:00 Monday to Saturday; 10:00 - 00:30
20/10648/LIPN	Not Recorded	Basement And Ground Floor 16 Irving Street London WC2H 7AU	Restaurant	Sunday; 12:00 - 00:00 Monday to Saturday; 10:00 - 00:30
21/00239/LIPDPS	Notes Music And Coffee	31 St Martin's Lane London WC2N 4ER	Cafe	Sunday; 12:00 - 22:30 Monday to Thursday; 10:00 - 23:30 Friday to Saturday; 10:00 - 00:00
22/03483/LIPDPS	Tandoor Chop House	8 Adelaide Street WC2N 4HZ	Restaurant	Sunday; 12:00 - 23:00 Monday to Thursday; 10:00 - 00:00 Friday to Saturday; 10:00 - 00:30
15/05963/LIPDPS	8 Till Late	23 Whitcomb Street London WC2H 7HA	Shop	Saturday; 08:00 - 23:00 Sunday; 10:00 - 22:00 Monday to Friday; 07:00 - 23:00
22/11718/LIPDPS	Not Recorded	Basement To First Floor 17 - 18 Irving Street London WC2H 7AU	Restaurant	Sunday; 07:00 - 00:00 Monday to Saturday; 07:00 - 00:30
22/04312/LIPDPS	Haymarket Hotel	1 Suffolk Place London SW1Y 4HX	Hotel, 4+ star or major chain	Saturday; 07:00 - 03:00 Sunday; 09:00 - 00:00 Monday to Sunday; 00:00 - 00:00
23/03215/LIPDPS	The Sherlock Holmes	Sherlock Holmes Public House 10 - 11 Northumberland	Public house or pub restaurant	Thursday to Saturday; 08:00 - 00:30 Sunday to Wednesday;

		d Street London WC2N 5DB		08:00 - 23:30
20/09445/LIPVM	Garrick Theatre	2 Charing Cross Road London WC2H 0HH	Theatre	Monday to Sunday; 09:00 - 00:00
13/03410/LIPN	Barrafina	10 Adelaide Street WC2N 4HZ	Restaurant	Sunday; 12:00 - 23:00 Monday to Saturday; 10:00 - 00:00
22/02044/LIPDPS	The Clermont Charing Cross	Charing Cross Hotel Strand London WC2N 5HX	Hotel, 4+ star or major chain	Monday to Sunday; 00:00 - 00:00
24/00125/LICCH	Claude's Fish & Seafood Bar	Ground Floor 19 - 20 Irving Street London WC2H 7RR	Restaurant	Monday; 10:00 - 00:30 Tuesday; 10:00 - 00:30 Wednesday; 10:00 - 00:30 Thursday; 10:00 - 00:30 Friday; 10:00 - 00:30 Saturday; 10:00 - 00:30 Sunday; 12:00 - 23:30
22/06446/LIPRW	St George Market	112 St Martin's Lane London WC2N 4BD	Restaurant	Sunday; 08:00 - 23:30 Monday to Thursday; 07:00 - 00:00 Friday to Saturday; 07:00 - 00:30
12/02800/LIPV	Nero Express	Charing Cross Station Strand London WC2N 5HS	Takeaway food outlet	Saturday; 06:30 - 01:00 Sunday; 07:00 - 01:00 Monday to Friday; 06:00 - 01:00 Monday to Sunday; 00:00 - 00:00
22/10747/LIPVM	The Clarence	Ground Floor 53 Whitehall London SW1A 2HP	Public house or pub restaurant	Monday; 09:00 - 01:00 Tuesday; 09:00 - 01:00 Wednesday; 09:00 - 01:00 Thursday; 09:00 - 01:00 Friday; 09:00 - 01:00 Saturday; 09:00 - 01:00 Sunday; 09:00 - 01:00
23/08505/LIPDPS	Not Recorded	40 - 42 William Iv Street London WC2N 4DD	Restaurant	Sunday; 12:00 - 22:30 Monday to Thursday; 10:00 - 23:30 Friday to

				Saturday; 10:00 - 00:00
22/04594/LIPDPS	Tequila Mockingbird (Basement)	40 - 42 William Iv Street London WC2N 4DD	Restaurant	Sunday; 12:00 - 22:30 Monday to Thursday; 12:00 - 23:30 Friday to Saturday; 12:00 - 00:00
19/14728/LIPDPS	XIHome Dumplings AndBuns	Basement And Ground Floor 43 Chandos Place London WC2N 4HS	Restaurant	Sunday; 12:00 - 00:00 Monday to Saturday; 10:00 - 00:30
22/12002/LIPDPS	Hub By Premier Inn	110 St Martin's Lane London WC2N 4BA	Hotel, 3 star or under	Sunday; 06:00 - 23:00 Monday to Thursday; 06:00 - 23:30 Monday to Sunday; 00:00 - 00:00 Friday to Saturday; 06:00 - 00:30
23/03893/LIPDPS	Bella Italia	10 Irving Street London WC2H 7AT	Restaurant	Sunday; 09:00 - 00:00 Monday to Saturday; 09:00 - 01:00 Sundays before Bank Holidays; 09:00 - 01:00
20/05749/LIPCH	The Pasty Shop	Unit 4 Main Concourse Charing Cross Station Strand London WC2N 5HS	Sales kiosk	Monday to Sunday; 00:00 - 00:00
21/03704/LIPDPS	Uppercrust Units 14 & 15	Unit 14 Charing Cross Station Strand London WC2N 5HS	Shop	Monday to Sunday; 00:00 - 00:00
20/03835/LIPCH	Whistlestop Food & Wine	Unit 6 Charing Cross Station Strand London WC2N 5HS	Shop	Sunday; 08:00 - 02:00 Monday to Saturday; 06:00 - 02:00
20/03885/LIPCH	Burger King (UK) Ltd	Unit 1 Charing Cross Station Strand London WC2N 5HS	Restaurant	Monday to Sunday; 23:00 - 01:00
24/00365/LIPDPS	M & S Simply Food	Unit 18 And Unit 19 Charing Cross Station Strand London WC2N 5HS	Shop	Monday to Sunday; 07:00 - 03:00
23/04969/LIPDPS	Hotel Chocolat	Charing Cross Station Strand	Sales kiosk	Saturday; 09:00 - 20:00 Sunday;

		London WC2N 5HS		10:00 - 19:00 Monday to Friday; 07:00 - 20:00
21/08284/LIPN	Nero	Charing Cross Station Strand London WC2N 5HS	Cafe	Monday; 00:00 - 00:00 Tuesday; 00:00 - 00:00 Wednesday; 00:00 - 00:00 Thursday; 00:00 - 00:00 Friday; 00:00 - 00:00 Saturday; 00:00 - 00:00 Sunday; 00:00 - 00:00
20/07906/LIPN	Civil Service Club	13 - 15 Great Scotland Yard London SW1A 2HJ	Club or institution	Monday to Sunday; 00:00 - 00:00
06/12648/WCCMAC	Beefsteak Club	Basement To First Floor 9 Irving Street London WC2H 7AH	Club or institution	Monday to Friday; 17:30 - 23:30 Monday to Friday; 13:00 - 15:00
24/00220/LIPDPS	Not Recorded	9A Irving Street London WC2H 7AT	Cafe	Sunday; 08:00 - 00:30 Monday to Thursday; 08:00 - 00:30 Friday to Saturday; 08:00 - 01:30
23/08460/LIPDPS	Little Italy	6 - 7 Irving Street London WC2H 7AT	Not Recorded	Monday; 10:00 - 05:00 Tuesday; 10:00 - 05:00 Wednesday; 10:00 - 05:00 Thursday; 10:00 - 05:00 Friday; 10:00 - 05:00 Saturday; 11:00 - 01:30
07/02903/LIPDU	Price Waterhouse Coopers	Ground Floor To Fifth Floor 1 Embankment Place London WC2N 6NN	Not Recorded	
24/00258/LIPDPS	Price Waterhouse Coopers	1 Embankment Place London WC2N 6RH	HQs and Institutional Offices	Monday; 00:01 - 00:00 Tuesday; 00:01 - 00:00 Wednesday; 00:01 - 00:00 Thursday; 00:01 - 00:00 Friday; 00:01 - 00:00 Saturday; 00:01 - 00:00 Sunday;

				00:01 - 00:00
18/08436/LIPVM	Theatre Royal	Theatre Royal 8 Haymarket London SW1Y 4HT	Theatre	Saturday; 09:00 - 00:00 Sunday; 14:00 - 00:00 Monday to Friday; 09:00 - 04:00
20/08348/LIPCH	Harp Public House	47 Chandos Place London WC2N 4HS	Public house or pub restaurant	Sunday; 12:00 - 22:30 Monday to Thursday; 10:00 - 23:30 Friday to Saturday; 10:00 - 00:00 Sundays before Bank Holidays; 10:00 - 00:00
20/00086/LIPV	Caffe Italiano	2 - 3 Irving Street London WC2H 7AT	Restaurant	Monday; 08:00 - 00:30 Tuesday; 08:00 - 00:30 Wednesday; 08:00 - 00:30 Thursday; 08:00 - 00:30 Friday; 08:00 - 00:30 Saturday; 08:00 - 00:30 Sunday; 08:00 - 00:00
18/09423/LIPN	Not Recorded	18 - 21 Northumberland Avenue London WC2N 5EA	Not Recorded	Monday to Sunday; 00:00 - 00:00
15/04741/LIPDPS	The Ship & Shovell	Ground Floor 1 Craven Passage London WC2N 5PH	Public house or pub restaurant	Sunday; 12:00 - 23:00 Monday to Saturday; 10:00 - 23:30
17/08391/LIPDPS	Coutts & Co	440 Strand London WC2R 0QS	Office	Sunday; 12:00 - 23:00 Monday to Saturday; 10:00 - 23:30
23/03402/LIPD	English National Opera	London Coliseum 32 - 35 St Martin's Lane London WC2N 4ES	Theatre	Monday to Sunday; 09:00 - 00:00
21/00446/LIPV	The 2 Brydges Club	2 Brydges Place London WC2N 4HP	Club or institution	Sunday; 12:00 - 00:30 Monday to Saturday; 10:00 - 01:00
24/00123/LIPDPS	TGI Fridays	29 - 30 Leicester Square London WC2H 7LA	Not Recorded	Sunday; 09:00 - 01:00 Monday to Saturday; 09:00 - 01:30 Sundays before

				Bank Holidays; 09:00 - 01:30
23/06855/LIPDPS	Global Radio	29 - 30 Leicester Square London WC2H 7LA	Office	Monday to Friday; 07:00 - 00:00
18/05674/LIPDPS	Global Radio	29 - 30 Leicester Square London WC2H 7LA	Office	Monday to Friday; 07:00 - 00:00
24/02017/LIPCH	Radisson Hampshire Hotel	31 - 36 Leicester Square London WC2H 7LH	Hotel, 4+ star or major chain	Monday to Sunday; 00:01 - 00:00
23/02225/LIPCH	San Carlo Fumo	Basement And Ground Floor 37 St Martin's Lane London WC2N 4ER	Restaurant	Sunday; 07:00 - 22:30 Monday to Thursday; 07:00 - 23:30 Friday to Saturday; 07:00 - 00:00 New Year's Eve; 07:00 - 06:59 Sundays before Bank Holidays; 07:00 - 00:00
21/11003/LIPRW	The Londoner Hotel, 38 Leicester Square, London, WC2H 7DX	32 Leicester Square London	Hotel, 4+ star or major chain	Monday; 00:00 - 00:00 Tuesday; 00:00 - 00:00 Wednesday; 00:00 - 00:00 Thursday; 00:00 - 00:00 Friday; 00:00 - 00:00 Saturday; 00:00 - 00:00 Sunday; 00:00 - 00:00