



## City of Westminster Licensing Sub-Committee

<b>Meeting:</b>	<i>Licensing Sub-Committee</i>
<b>Date:</b>	<i>27 November 2014</i>
<b>Classification:</b>	<i>General Release</i>
<b>Premises:</b>	<i>Harmony, 103A Oxford Street, London, W1D 2HG</i>
<b>Wards Affected:</b>	<i>West End</i>
<b>Financial Summary:</b>	<i>None</i>
<b>Report of:</b>	<i>Operational Director for Premises Management</i>

### **1. Executive Summary**

- 1.1 The council has received an application to renew a sex establishment licence from Harmony Limited for the sex shop at Harmony, 103A Oxford Street, London, W1D 2HG. This report sets out the application details, objections, policy and legal context along with other considerations that the Committee requires to determine this application.
- 1.2 This application was made on 17 January 2014 and received three objections within the 28 day consultation period. Due to officer error, the objected status of the case was not identified until much later. As soon as the error was identified, the applicant and objectors were contacted and the case was brought before the Licensing Sub-Committee.

### **2. Options**

- 2.1 Following consideration of the information given orally at the hearing and in writing by the applicants and objectors, Members may:
  - 2.1.1 Grant the renewal application in full
  - 2.1.2 Grant the renewal application subject to the standard conditions and/or any modifications to any part of the application and imposition of any additional conditions proposed by a party to the hearing, or
  - 2.1.3 Refuse the application

### **3. Application**

- 3.1 On 17 January 2014, the licence holder, Harmony Ltd, applied to renew their Sex Shop licence for the premises at 103A Oxford Street, London, W1D 2HG (see Appendix A2):
- 3.2 The current licence for the premises is attached at Appendix A1. This licence expired on 31 January 2014. Under Paragraph 11 (1) of Schedule 3 to the Local Government (Miscellaneous Provisions) Act 1982, as a renewal application was made prior to its expiry, this licence remains in force until the withdrawal of the application or its determination by the Council.
- 3.3 The premises has held a Sex Establishment licence to operate as a Sex Shop since 9 March 2004 (see licence history at Appendix D). Minutes of the original Licensing Sub-Committee which determined the new application are attached at Appendix A3. The original application was unopposed and the subsequent renewal applications have not attracted any objections until this most recent application.
- 3.4 The licence is subject to the Standard Conditions for Sex Establishments, attached at Appendix C. In addition, the licence is subject to nine special conditions on the licence (see Appendix A1 & C). Further information on conditions is provided in section 6 of this report.

### **4. Objections**

- 4.1 The application received three (3) objections, attached as Appendices B1 to B3. The objections are from local residents. As permitted by paragraph 10(17) of Schedule 3 to the Act, all of these objections are anonymous.
- 4.5 Objection 1, received on 11 February 2014, is from a local resident (see Appendix B1). It states that the location is inappropriate for a sex shop given the mission of the New West End Company which aims to create a world class shopping area in the West End. The branding and message visible to members of the public, including children, from the exterior of the premises is inappropriate for the family-oriented retail area.

It continues that the regeneration plans for the area have increased the residential population in the vicinity of the premises, including private residences at Paramount House, The Quadrangle, The Hat Factory, the Beaver Building and Ampersand. In addition, the hoarding around Great Chapel Street, caused by the Crossrail project, has created a narrow passageway along the side of the premises which is intimidating to pedestrians, particularly young women.

Crossrail will increase the numbers of visitors to the Oxford Street area for high-end shopping and restaurants. A prominent sex shop is inappropriate in this area.

- 4.6 Objection 2, received on 11 February 2014, is from a local resident and mirrors the concerns of Objection 1 (see Appendix B2).
- 4.7 Objection 3, received on 12 February 2014, is from a local resident which states that the premises is inappropriate for the area given Oxford Street's movement towards retail establishments that enhance its reputation for both residents and tourists (see Appendix B3).

## 5. Policy Considerations

- 5.1 On 15 June 1999 the Planning and Transportation Committee decided that, for the purposes of licensing sex establishments (excluding Sexual Entertainment Venues) under the provisions of Schedule 3 to the Local Government (Miscellaneous Provisions) Act 1982, one of the relevant locations should be Soho and that the appropriate maximum number of sex establishments within that locality should be 16.
- 5.2 Within the Soho locality, as defined, there are currently 12 licensed sex establishments. These are:

<b>Licence Holder:</b>	<b>Premises Name:</b>	<b>Address:</b>
Heart of Soho Ltd	Prowler Soho	5 – 7 Brewer Street
Mr James Poulton	Soho Original Bookshop	12 Brewer Street
Mr Timothy Hemming	Simply Pleasure.Com	31 Brewer Street
Swish Publications Ltd	Super Mags	33 Brewer Street
Harmony Limited	Harmony	99A Charing Cross Road
Simply Pleasure Ltd	Fifty & Dean	50 Old Compton Street
Mr James Poulton	Soho Original Bookshop	121-125 Charing Cross Road
Harmony Limited	Harmony Adult Centre	4-4A Walker's Court
Mr David Edwards	Clone Zone	64 Old Compton Street
<b>Harmony Limited</b>	<b>Harmony Adult Centre</b>	<b>103A Oxford Street</b>
Mr Nigel Moon	British Sex Shop	8 Green's Court
Mr Stephen Squire	Adult World	5 Walker's Court

## **6. Conditions**

- 6.1 The licence is subject to nine special conditions attached to the licence (see Appendix A1 & C). These include conditions designed to limit the impact the advertising and presence the premises has on the high street.

Special condition 2 states:

“There shall be no pictorial or diagrammatical representations of full or implied nudity to advertise what is going on inside the premises.”

Special condition 4 states:

“All windows shall remain obscured and if displayed any signs must be discreet and fixed no lower than five feet above the ground.”

- 6.2 The licence is also subject to Westminster’s Standard Conditions for Sex Establishments (see Appendix C) which include conditions restricting the visibility into the premises.

Standard condition 8 (a) states:

“The entrances to the premises shall be of a material or covered with a material which will render the interior of the premises invisible to passers-by.”

Standard condition 8 (b) states:

“Windows and openings to the premises other than entrances shall either be obscured or with the consent of the Council shall have suspended behind them, in a position and at an altitude approved by the Council, opaque screens or blinds of a type and size approved by the Council.”

## **7. Legal Implications**

- 7.1 The Licensing Sub-Committee may determine to:
- (a) Grant the renewal application in full
  - (b) Grant the renewal with additional special conditions which the Licensing Sub-Committee deem appropriate; or
  - (c) Refuse the application.
- 7.2 Before refusing to renew a licence to the applicant, the Licensing Authority shall give the applicant an opportunity to appear before and of being heard by the Licensing Sub-Committee (Para 10(19) Schedule 3 LG(MP)A1982).

- 7.3 In considering this application, the Licensing Sub-Committee shall have regard to any observations submitted to them by the Chief Officer of Police and any objections that have been received in writing within the 28 day consultation period (Para 10(18) Schedule 3 LG(MP)A1982).
- 7.4 The Licensing Sub-Committee may refuse to renew a licence for the following reasons:
- (a) that the applicant is unsuitable to hold a licence by reason of having been convicted of an offence or for any other reason;
  - (b) that if the licence were to be granted the business to which it relates would be managed by or carried on for the benefit of a person, other than the applicant, who would be refused the grant of such a licence if he made the application himself;
  - (c) that the number of sex establishments in the relevant locality at the time the application is determined is equal to or exceeds the number which the authority consider is appropriate for that locality;
  - (d) that the grant or renewal of the licence would be inappropriate, having regard—
    - (i) to the character of the relevant locality; or
    - (ii) to the use to which any premises in the vicinity are put; or
    - (iii) to the layout, character or condition of the premises, vehicle, vessel or stall in respect of which the application is made.
- 7.5 If the Licensing Sub-Committee determine to renew the Sex Establishment licence, the licence will be subject to the Standard Conditions for Sex Establishment licences, unless the Sub-Committee determines that certain Standard Conditions should be expressly excluded or varied (Para 13(4) Schedule 3 LG(MP)A1982).
- 7.6 Should the Licensing Sub-Committee determine to refuse the application to renew a licence under paragraph 7.4 (a) or (b) above, the applicant may appeal to the Magistrates' Court within 21 days beginning with the date on which the applicant is notified of the refusal of his application (Para 27(1) Schedule 3 LG(MP)A1982).

## **8. Human Rights Act and Equalities Act**

- 8.1 In making a decision consideration will need to be given to the applicants rights under the European Convention on Human Rights. The right to peaceful enjoyment of possessions (Article 1 of the First Protocol) and freedom of expression (Article 10) may be relevant. The Home Office Guidance suggests that "local authorities would be well advised to consider whether any interference with the applicants rights under Article 10 or Article 1, Protocol 1 of the European Convention on Human Rights is necessary and proportionate for the prevention of disorder or crime, for the protection of health or morals or for the protection of

the rights and freedoms of other, or in the case of Article 1, Protocol 1, can be justified in the general interest”.

### **Appendices**

- A1 – Current Sex Establishment Licence
- A2 – Renewal application form
- A3 – Licensing Sub-Committee minutes dated 09.03.2004
- B1 – Objection 1
- B2 – Objection 2
- B3 – Objection 3
- C – Schedule of Conditions
- D – Licensing history of the premises
- E1 – Map of the locality
- E2 – Residential Map of the locality
- F – Photographs of the premises

**If you have any queries about this report or wish to inspect any of the background papers please contact: Nick Nelson on 020 7641 3431 or at [nnelson@westminster.gov.uk](mailto:nnelson@westminster.gov.uk)**

### **BACKGROUND PAPERS**

- Local Government (Miscellaneous Provisions) Act 1982
- Report to Planning and Transportation Committee of 15 June 1999
- Rules of Procedure governing Sex Establishment Licensing
- Standard conditions for Sex Establishment Premises



City of Westminster

WARD : West End

UPRN: 010033569778

## SEX ESTABLISHMENT LICENCE

The CITY OF WESTMINSTER under the provisions of the Local Government (Miscellaneous Provisions) Act 1982 as amended by the Greater London Council (General Powers) Act 1986

hereby licences HARMONY LIMITED  
to use the premises Harmony Adult Centre  
103A Oxford Street  
London  
W1D 2HG

as a Sex Shop establishment.

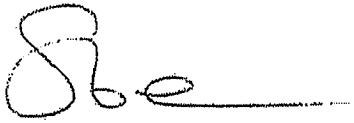
This licence is in force up to 31 JANUARY 2014

and is granted subject to the Standard Conditions of the Council annexed hereto, to the following additional special conditions (if any) :

1. Notwithstanding Standard Condition no. 4, the premises may be kept open for the purpose of this licence from 23:00 on each of the days Monday to Saturday to 01:00 on the day following, and from 23:00 to 00:00 on Sundays.
2. There shall be no pictorial or diagrammatical representations of full or implied nudity to advertise what is going on inside the premises.
3. No music or other sounds shall be audible outside the premises.
4. All windows shall remain obscured and if displayed any signs must be discreet and fixed no lower than five feet above the ground.
5. Steps shall be taken to ensure the quiet and orderly entry and exiting of the premises by staff and patrons.
6. The Council shall be advised of managers, proposed managers and changes of managers.
7. The licensee shall ensure that the highway and public spaces in the vicinity of the premises are kept free of litter from the premises at all material times to the satisfaction of the Council.

Cont...

8. No illegal unauthorised advertisements of any kind (including placard, poster, sticker, flyer, picture, letter, sign or other mark) is inscribed or affixed upon the surface of the highway, or upon any building, structure, works, street furniture, tree or any other property, or is distributed on the street to the public, that advertises or promotes the establishment, its premises, or any of its events, facilities, goods or services.
9. All waste is properly presented and placed out for collection no earlier than 30 minutes before the stated collection times.

<b>DATE: 23 JULY 2013</b>	 <b>SIGNED: pp</b> Operational Director - Premises Management
---------------------------	---





City of Westminster

PREMISES MANAGEMENT  
LICENSING SERVICE

17 JAN 2014

CITY OF WESTMINSTER

### APPLICATION FOR RENEWAL OF A SEX ESTABLISHMENT LICENCE

This form should be completed and forward to the Licensing Service, City of Westminster, 4<sup>th</sup> Floor, Westminster City Hall, 64 Victoria Street, London SW1E 6QP (Telephone: 020 7641 8549) with a cheque or postal order for the appropriate fee made payable to the City of Westminster and crossed.

**CASH SHOULD NOT BE SUBMITTED.**

I/We apply for renewal of a licence for the premises in item 2.

1.	(a) Full name and address of applicant(s). (Use separate sheet if applicable)	Name:- HARMONY LIMITED Address:- 222 - 228 MAYBANK ROAD, LONDON, E18 1ET
	(b) Tel No: (during normal office hours)	0208.505.0946
2.	If the applicant is an individual the following information is to be supplied:-	
	(a) Date of Birth	N/A
	(b) Place of Birth	N/A
3.	(a) Name and address of premises.	Name:- HARMONY Address:- 103. OXFORD STREET, LONDON, W1D 2HF
	(b) Tel No:	0207.734.5969
4.	Give details of the total turnover of the business during the 12 months immediately prior to this application.	£1,895,885 68
5.	Give details of the anticipated turnover of the premises for the next 12 months.	£1,828,000.00
6.	Give details of the articles which are to be offered for sale at the premises.	R18 DVAS MAGAZINES / BOOKS MARITAL AIDS LINGERIE CLOTHING

**IMPORTANT NOTE: THIS APPLICATION IS OPEN TO INSPECTION BY THE PUBLIC**

7.	Has the management of the premises in the absence of the licence holder changed?	Yes <input checked="" type="radio"/> No <input type="radio"/> (If yes, the following details need to be supplied on a separate sheet). (a) Full Name (b) Private Address (c) Date of Birth (d) Place of Birth (e) Four photos of them
8.	(a) Name of newspaper in which application was advertised.	WESTEND EXTRA
	(b) Date of newspaper: (See Note B)	17/01/2014
9.	Date poster exhibited at the premises: (See Note C)	17/01/2014
10.	Have you sent a copy of the application to the Metropolitan Police Service as required by the Act. (See Note D)	Yes <input checked="" type="radio"/> No <input type="radio"/> 17/01/2014
11.	Address to which licence and correspondence should be sent.	MISS LOUISE SALIBA HARMONY LIMITED 222-228 MAYBANK ROAD, LONDON, E18 1ET

### WARNING

ANY PERSON WHO, IN CONNECTION WITH THIS APPLICATION, MAKES A FALSE STATEMENT WHICH THEY KNOW TO BE FALSE IN ANY MATERIAL RESPECT, OR WHICH HE DOES NOT BELIEVE TO BE TRUE, IS, GUILTY OF AN OFFENCE AND LIABLE ON SUMMARY CONVICTION TO A FINE NOT EXCEEDING £20,000.

I/We (please print full name) MR. STEVEN THOMAS ELYNS declare that the information given above is true and complete in every respect.

Signature.....

Date.....17/01/2014.....

*Data Protection Act 1998: This information will only be used for the purposes stated above. Please address any data protection enquiries to the Data Protection Officer, Information Services, 16<sup>th</sup> Floor, Westminster City Hall, 64 Victoria Street, London SW1E 6QP.*



**CITY OF WESTMINSTER**  
**LICENSING SUB-COMMITTEE NO. 1**  
**9 MARCH 2004**

**MINUTES OF PROCEEDINGS**

At a meeting of the Licensing Sub-Committee No. 1 held at 6.00pm on Tuesday 9 March 2004 in the Council Chamber, Council House, Marylebone Road, NW1.

**Present:** Councillors Audrey Lewis (Chairman)  
Sarah Richardson  
Guthrie McKie

**1 MEMBERSHIP**

- 1.1 The Director of Legal and Administrative Service's representative reported that there were no changes to the membership.

**2 DECLARATIONS OF INTEREST**

- 2.1 Councillor Lewis declared that she knew Sally Humphreys, Oxford Street Director of the New West End Company, with whom the Councillor had not discussed the application.

**3 MINUTES**

- 3.1 The Chairman signed the minutes of the meeting held on 18 December 2003 as an accurate record of proceedings.

**4 HARMONY, 103-103A OXFORD STREET, W1**

**The Introduction**

- 4.1 Ms Bamborough, Licensing Manager, introduced the application for a new sex establishment licence. She advised that the application was unopposed. The applicant had indicated prior to the hearing that were the Sub-Committee to grant the application, he, Mr Elvins, would surrender an existing licence at 11 Old Compton Street, W1. Concluding, Ms Bamborough explained that the District Surveyor's Service requested that

works be undertaken at the premises before any licence granted took effect.

### **The Application**

- 4.2 Councillor Lewis confirmed to Mr Gouriet, Counsel for the applicants, that all Members had received and considered the officer's report and applicant's submissions.
- 4.3 Summarising the application, Mr Gouriet noted that it fell in line with the City Council's policy in locational terms. He suggested that the presumption was in favour of the application. Referring to the relevant policy considerations at paragraph 4.6 of the report, Mr Gouriet noted that the concerns expressed within – that an even distribution of sex establishment licences would have a greater impact than the current concentration – would not apply in this case. The applicant had retained the services of Mr Thackeray, a Town Planning expert, who's report, circulated to the Sub-Committee Members previously, provided pertinent details of the area and, in Mr Gouriet's submissions, provided commentary which suggested that the application was entirely in line with the character of the area surrounding the Tottenham Court Road.
- 4.4 Mr Gouriet noted that Mr Elvin's other premises were all situated on the ground floor and that they were all licensed by and within the City Council's control. The application related to the basement area only at 103/103A Oxford Street. He submitted that the application would not have a detrimental effect on the local area.
- 4.5 The Director of Legal and Administrative Services' representative asked with reference to relevant case law what was Mr Gouriet's interpretation of the term "relevant locality". Mr Gouriet preferred a common sense approach and used the term to mean Soho.
- 4.6 Mr Thackeray, Chartered Town Planner, was introduced to the Sub-Committee and confirmed that he had nothing further to add to the report circulated to Members prior to the hearing. Mr Thackeray agreed that the locality of the premises was Soho and he submitted that he took that approach mainly because that was how the Council had sought to define it. Mr Gouriet suggested that there was a concentration of sex establishments in the Soho area and he asked Mr Thackeray whether it was appropriate to continue that practice. For Mr Thackeray, the situation that had arisen was a historic one and he thought the character of the area had been affected by it. He did not think that the areas currently concentrated were the only ones suitable.

- 4.7 Mr Thackeray did not think that the application would adversely affect the local area if granted. He considered that, by its very nature, Oxford Street was a retail area spanning two kilometres with a variety of shops and he noted that the application was for a new retail shop first and foremost. Mr Thackeray preferred the proposed shop frontage generated by computer and depicted at page 12 of the applicant's submissions to the appearance of the existing premises. He regarded the end of Oxford Street closest to Tottenham Court Road as the shabbiest and he suggested that in his opinion the application would enhance the appearance of the premises. Mr Thackeray explained that the application related to a site in a conservation area and noted that planning legislation required that changes made to the site would need to enhance its appearance.
- 4.8 Responding to questions from the Sub-Committee, Mr Thackeray agreed with Councillor Mckie that in some instances it was preferable to concentrate certain types of premises. Mr Thackeray suggested that the principle could be said to apply to drinking establishments, in that clients and the police generally preferred venues to be in the same area. Many local authorities had policies to disperse the saturation of estate agents, the fronts of which were regarded as bare. In general terms, Mr Thackeray thought a dispersal of similar properties was favourable. Councillor McKie sought to differentiate and Mr Thackeray agreed that in this case it was not necessary to consider the effects of several people dispersing into an area at 1am.
- 4.9 Councillor Lewis referred to paragraph 5.10 of the report and asked Mr Thackeray to comment on the number of children he would expect to see outside the current premises in Old Compton Street. He agreed that he would expect it to be less than on Oxford Street but he did not agree that the numbers of children would vary considerably at different points in the year.
- 4.10 Mr Gouriet contended that sex establishments in Soho would continue to be concentrated even if the application were refused. Mr Thackeray thought that the impact of sex establishments was minimal and he submitted that the impact must be reduced where the premises are located in a basement area. The image and type of clientele attracted to sex establishments was poor but Mr Gouriet and Mr Thackeray agreed that the concept here was a new, up-market one, in no way directed toward the "dirty mack brigade". Mr Gouriet suggested to Mr Thackeray that a change to general misconceptions could only be furthered were premises such as this re-located out of Soho.
- 4.11 The Director of Legal and Administrative Services' representative asked Mr Thackeray if he knew the reasons for the Council's policy boundary. Mr Thackeray did not feel able to comment since he was not involved, but

he did suggest that there were 16 similar premises in the area when the policy was implemented. It might be advisable not to dissect streets at future policy reviews. Mr Gouriet noted that the applicant's premises were located on the very edge of Soho.

- 4.12 Mr Steven Elvins, Company Director, 50% shareholder and applicant, advised that a great deal of money had been spent on modern design concepts at the premises. Mr Elvins planned to create a different image to that presented in Soho at his store on Oxford Street if the licence were granted. He explained that his other premises had provided the financial means by which he was able to invest substantially in the applicant premises. Mr Elvins sought to establish a store that customers felt able to walk into and enjoy. He did not believe that such a premises existed in the local area. Mr Elvins had commissioned full and proper plans before finalising the plans before the Sub-Committee and confirmed that his landlords were aware of and content with his plans. Were the licence granted, Mr Elvins would be looking to work closely and compliantly with the City Council.
- 4.13 Councillor Richardson asked whether Mr Elvins would be agreeable to a reduced terminal hour. The current premises traded until 10pm and Mr Elvin would concede a revised terminal hour of 10 or 11pm. Mr Elvins explained that security staff would be posted at the only entrance to the premises and that clients would need to pass counter staff as they entered the store. Additional staff were posted downstairs. The ground floor was exclusively stocked with inoffensive material. Identification was sought from anyone whose age was uncertain. The total square area of the premises was 4500 square feet, divided between the two floors.
- 4.14 Councillor Richardson noted that the new premises would be significantly larger than Mr Elvin's current premises in Soho. She suggested surrendering two licences rather than the one Mr Elvin had undertaken to release if the application was granted. Mr Barca explained that the application only related to the basement area of the premises and that under normal circumstances it would not be possible for the City Council to moderate the shop front. That had been offered by way of a concession. The Director of Legal and Administrative Services' representative advised that such a concession would need to be recorded as an undertaking since a condition to that effect would be unenforceable. Councillor Lewis confirmed that the suggested conditions detailed in the report at Annex D were agreeable.
- 4.15 Councillor McKie considered that the applicants had used crass stereotyping in their marketing material, included with the report by way of submissions. He sought to confirm that the amenity of the locality would be enhanced were the application granted, which the applicant assured

him it would. The character of Mr Elvins' other premises, including the terminal hour, had been affected by the locality. Mr Elvins confirmed his intention to work harmoniously with Council officers and he noted that he was familiar and worked closely with other relevant statutory authorities. He had never had any problems.

- 4.16 Councillor Lewis asked for details of the history of Mr Elvin's other premises. He had been trading on Charing Cross Road since 1996/1997 and from Newport Street and Walkers Court for 4 years. Mr Elvins had operated the premises at Old Compton Street for 6 months. Council officers had indicated they would prefer to see that premises relocated to Oxford Street. Prior to Mr Elvin's involvement, the premises had been unlicensed sex shops, cafés or coffee bars. Mr Elvins would aim to run his premises in line with the character of the proposed store on Oxford Street. Mr Barca was not aware of any real plans to redevelop the current premises on Old Compton Street. Mr Elvins had leases of between 5 and 20 years and owned the freehold on one property.
- 4.17 Mr Elvins planned to dedicate approximately 80% of the ground floor area to clothing and 40% of the basement area would be directed to fetish ware. Window displays were not replaced regularly at Mr Elvin's other stores, but his intention for Oxford Street was for it to be seasonal in style. Councillor Lewis confirmed that Mr Elvins would consult the City Council at the planning stage before implementing any changes.
- 4.18 Mr Gouriet confirmed with Mr McVitie, Licensing Inspector, that Mr Elvin's assertion that he had co-operated thoroughly with Council officers was borne out by his experience, which it was. Councillor Lewis asked Mr McVitie to comment on the application. He had not experienced any problems with licensed sex shops and nor had the police. He explained inspection arrangements, undertaken in consultation with the police. Window displays controlled by the applicants gave no cause for concern. The enhanced size of the Oxford Street premises did not pose problems for the Licensing Inspectorate. Councillor Lewis heard that the size of the application premises would be about three times larger than that held currently. Councillor Lewis explained her concern to ensure that the application was truly like-for-like, taking into account all the circumstances, including the size of the premises.
- 4.19 Councillor Richardson confirmed that the current applicant's premises was within Westminster and not Camden, which Mr McVitie duly did. Councillor Lewis confirmed with Ms Bamborough, Licensing Manager, that the photographs circulated to the Sub-Committee had been taken recently.
- 4.20 Mr Gouriet identified several problems with Soho and submitted that viewed fairly, bearing in mind the sizeable investment proposed by the

applicant, much could be done by pursuing the application to improve the locality. The sex shop industry had entered a downward spiral which Mr Elvin's concept attempted to buck, he submitted. The intention was to attract decent people with natural needs to the premises, contributing to a transformation of the sex industry in London. Mr Gouriet referred specifically to the last page of the applicant's submissions, identifying the types of people Mr Elvin's sought to attract. The application was a breath of fresh air desperately needed by the sex industry, he claimed. In a true sense, there would be no detrimental impact on the surrounding area were the licence granted. Mr Gouriet explained that because the application would improve the area there was no need to surrender two licences in this instance. The Director of Legal and Administrative Services' representative confirmed the nature and number of conditions agreed by the applicants.

### **The Decision**

This is an application by Harmony Limited for a new sex establishment licence for a sex shop with an extension of hours from 11 pm on each of the days Monday to Saturday to 1 am on the day following and from 11 pm to midnight on Sunday. The application is in respect of basement premises situated at 103 - 103A Oxford Street, London W1.

The shop premises under consideration occupy part of the ground floor and basement of an end of terrace building on the corner of Oxford Street and Great Chapel Street. The application is only in respect of the basement of the premises which is accessed from a staircase in the centre of the ground floor. The proposal involves the operation of an unlicensed shop on the ground floor, selling inoffensive items that do not typically require a sex shop licence, such as books, clothing, games and toys. Stronger material, such as restricted DVDs and videos, fetish wear and more explicit magazines etc will be sold in the basement. The entrance to the basement will be carefully monitored by security staff so as not to allow access to any minors.

On 15 June 1999 the Planning and Transportation Committee decided that, for the purposes of licensing sex establishments under the provisions of Schedule 3 to the Local Government (Miscellaneous Provisions) Act 1982, one of the relevant locations should be Soho and that the appropriate maximum number of sex establishments within that locality should be 16. There are currently 16 licensed sex establishments within this locality. This application will not result in an increase in the number of licensed premises because, if granted, the applicant has undertaken to surrender its existing licence held in respect of premises in Old Compton Street.



This application effectively amounts to an application to transfer a sex shop licence from one set of premises to another within the general locality known as Soho. This is an area south of Oxford Street, east of Regent Street, north of Coventry Street and west of Charing Cross Road. Most of the licensed sex uses within the area are concentrated in a small area around Brewer Street, Walkers Court, Rupert Street, Old Compton Street, Wardour Street and Great Windmill Street.

The report to the Planning and Transportation Committee dated 15 June 1999 sets out the advantages and disadvantages of sex related uses being concentrated in a small area of Soho. It states that the disadvantage of this is that the impact of these uses is greater than if the premises concerned were dispersed throughout Soho, or indeed, the Central Activities Zone. It then explains that the advantage of this is that the other areas of Soho are comparatively free of sex establishments. The report points out that if sex establishment premises were dispersed throughout Soho the overall environmental impact would be greater than under the current arrangements.

The first thing that has to be established is the "relevant locality" for the purposes of this application. The applicants say that it is the entire area known as Soho identified in the report dated 15 June 1999. The Sub-Committee does not agree. When a relevant locality is determined for the purposes of paragraph 12(3)(c) of the Local Government (Miscellaneous Provisions) Act 1982, the purpose is to establish the maximum number of sex establishments that can be allowed in that locality. It does not mean that any application for a sex shop must be granted in that locality simply because the number has not been exceeded. There may still be grounds of refusal, including those set out in paragraph 12(3)(d). That paragraph recognises that the character of the relevant locality may be relevant, even where the maximum number of sex establishments has not been exceeded.

The Sub-Committee does not think that any kind of policy decision was reached when the Soho area was created in terms of deciding the suitability of streets on the boundary of the area. The boundary was almost certainly determined as a matter of administrative convenience. If a policy decision had been taken to include Oxford Street, the Sub-Committee is of the view that the north side would also have been included.

The Sub-Committee has concluded that Soho has many different characteristics. It would be ridiculous to suggest that Oxford Street or Regent Street have the same character as Wardour Street and Old Compton Street. They are completely different. For the purposes of this application, the Sub-Committee has decided that the entire Soho area is not the relevant locality for the purposes of paragraph 12(3)(d) of Schedule 3 to the 1982 Act. The relevant locality is the immediate locality where the subject premises are situated, namely the north and south sides of Oxford Street, between Oxford Circus and Tottenham Court Road.

There are no objections to this application from the Metropolitan Police, the London Fire and Emergency Planning Authority, the Licensing Inspectorate, the Environmental Health Officer, the Cleansing Officer, the District Surveyor or the local councillors. The application is not contrary to policy as there will be no increase in the approved number of licences in the Soho locality (16) and there are no schools, places of religious worship or community / public buildings within 75 yards of the application premises (apart from a recording studio).

In terms of the outward appearance of the premises, the sex shop itself will be located in the basement. The applicants have indicated that they are prepared to allow the Council to agree to any external window displays on the ground floor, even though the ground floor is not part of the licensed premises. The applicants point out that there are other premises within a close proximity to the application premises which do not need a sex shop licence (or, at least, are not licensed) which have illuminated ground floor window displays which exhibit "explicit" lingerie. Moreover, it is suggested that the external display of the Harmony premises will be a great improvement on the appearance of the current shop on the site.

Evidence has been submitted regarding the suggestion made by another Councillor that Oxford Street is "predominantly a family led retail environment". This was clearly her perception as a local councillor and the Sub-Committee has some sympathy for the view she expressed (albeit that her views were not actually communicated to the applicants until the decision was released). The evidence from the applicants has obviously been submitted with a view to rebutting such a suggestion.

It is acknowledged by the Sub-Committee that sex shops are less detrimental than sex cinemas and sex encounter establishments. It is also acknowledged that 103 Oxford Street is not situated in a part of Westminster that can be considered to be primarily residential in nature. This application is made on the basis that if the new licence is granted, an existing licence will be surrendered in respect of premises in Old Compton Street. Although the premises in Old Compton Street are much smaller, this is considered to be an advantage as it does help to break up the concentration of premises in that area.

The Sub-Committee accepts that the proposals for these premises will be an improvement on what is regarded as a traditional sex shop. Having regard to the nature of the relevant locality and all the other circumstances identified, the Sub-Committee has decided to grant the application subject to a number of special conditions and undertakings.

There is concern that this application will result in the first licensed sex establishment in Oxford Street. The Sub-Committee is concerned to ensure that the granting of this application will not be the beginning of a phased programme to move sex shops from the concentrated areas where they are currently situated

(Brewer Street, Walkers Court, Rupert Street, Old Compton Street, Wardour Street and Great Windmill Street) to the potentially more profitable market that exists in a prime shopping street such as Oxford Street. Applicants will make such a judgment on a purely commercial basis. The City Council has to address the wider concerns. Consequently, the Sub-Committee wants to stress that this decision must not be regarded as a precedent for any similar applications that may be received.

Consequently, **THE DECISION IS**

That the application made by Harmony Limited for a new sex establishment licence for a sex shop in respect of the basement of 103 - 103A Oxford Street, London W1 be granted until 31 January 2005 subject to the standard conditions for annual licences for sex establishments and the following special conditions:

1. The premises shall not be used for the purposes of this licence until all works required have been completed to the satisfaction of the Council and this condition has been removed from the licence.
2. This licence will not become operative until the licence for the existing sex establishment at 11 Old Compton Street has been surrendered and this condition has been removed from the licence.
3. Notwithstanding the provisions of Standard Condition 4 the premises may be kept open for the purposes of this licence from 11am to 10 pm on each of the days Monday to Sunday.
4. Access to the basement will solely be by the internal staircase from the ground floor shop. The staircase leading to Great Chapel Street will not be used for access under any circumstances (subject to any use in the event of fire).
5. Details of the dedicated refuse storage and waste collection arrangements shall be sent to the Council for approval within 28 days of the grant of any licence.
6. There shall be no advertisement of the premises by way of "A" boards or temporary poster signs.
7. The fixed signage at the premises and the general external appearance shall be approved by the City Council.
8. The number of persons accommodated at any one time (excluding staff) shall not exceed 40.

In reaching this decision, regard has been given to the undertakings given by / on behalf of the applicant as follows:

- (a) The licensee shall submit plans to the Council for the shop front (including window display) of the ground floor premises which shall not be implemented without the written approval of the Council. This will be done before either the ground floor or the basement premises open for trading.
- (b) No change to the shop front or the window display shall be made without the prior written approval of the Council.
- (c) The licensee will ensure that no person under the age of 18 is admitted to the premises (ground floor and basement).
- (d) The terminal hours of trading of the ground floor shall be those permitted by the licensed basement.

**RESOLVED:** The Chairman advised that the application would be granted for the reasons set out above and subject to revised undertakings supplied by the applicants.

## **5 CLOSE OF MEETING**

5.1 The meeting ended at 20:35.

SIGNED: \_\_\_\_\_ DATE: \_\_\_\_\_

OBJECTION 1

Nelson, Nicholas

---

From: [REDACTED]  
Sent: 11 February 2014 20:35  
To: General Licensing  
Cc: [REDACTED]  
Subject: Ref: 14/00509/LISEXR, Harmony Adult Centre

Follow Up Flag: Follow up  
Flag Status: Completed

Dear Sirs,

Ref: 14/00509/LISEXR, Harmony Adult Centre

We wish to object to the renewal of the premises license for Harmony Adult Centre, 103A Oxford Street, London, W1D 2HG. We are a local family, and we live at [REDACTED]. We can be contacted on this email address or by telephone [REDACTED].

Our grounds for objecting are:

- Harmony's retail offering and position is contradictory to the mission of The New West End Company, which states it is "dedicated to driving forward London's West End as the world's top shopping destination". As the body elected by West End businesses to ensure London's West End shopping experience is world class, and its aims supported by Westminster Council, we assume they can not be supportive of Harmony in the mix as a credible Oxford Street retailer.
- Harmony's prominent position on Oxford Street makes its branding and message clearly visible to those underage – be they pedestrians or passengers in cars, taxis and buses – and this is entirely inappropriate given the 'family day-out' draw of shopping in the West End and the otherwise family orientated retail mix of Oxford Street.
- Harmony's continuing operation as a sex shop would be against Westminster Council's own position in regard to reducing the volume of sex establishments in the Soho area and its support of the area's regeneration and transformation.

• A significant part of the regeneration programme supported and allowed by Westminster Council for the Soho and Fitzrovia area, has been the bringing back to life of out-dated and redundant office buildings as private residences, and many are close to the site of Harmony; Paramount House, The Quadrangle, The Hat Factory and Beaver Building and the (soon to be completed) Ampersand to name a few - with some developments only completed and occupied over the last 12-months. These are not simply buy-to-let investment properties by overseas landlords, but real homes for real families. The Hat Factory and Beaver Buildings is almost completely owner occupied, and several are occupied by families with teen and pre-teen children. The positioning of a sex shop in close proximity to the rising volume of family residential housing is increasingly unacceptable.

• The site of Harmony's retail store on the corner of Oxford Street and Great Chapel Street is concerning and impacting detrimentally on the area given the extensive work being undertaken by the Crossrail project. The hoarding around the Crossrail site has transformed Great Chapel Street for the worse from a full-width street to a narrow single-file passageway (with recessed doorways) and the assumption is that this hoarding will remain in situ for a considerable time to come (several years) given the Crossrail building programme.

o A highly visible and obvious adult sex shop and a narrow passageway now make Great Chapel Street as a pedestrian route a definite no-go street for many - particularly young women and [REDACTED]. Oxford Street visitors and local residents, male or female, and especially those on their own, should not be made to feel vulnerable in what should be a world class shopping street and area.

o Westminster Council has an obligation to make Oxford Street and its surrounding streets as welcoming and non-threatening as possible to all its visitors and the increasing number of residents in the Soho and Fitzrovia areas. The type of retail establishment is much a part of achieving this as is good street lighting and access. Crossrail's continued impact on Great Chapel Street can not be reversed, but the additional impact of a sex shop on the corner of Great Chapel Street can.

• The arrival of Crossrail:

o Crossrail will have a huge impact in delivering significantly increased numbers of visitors (UK and overseas) to the Oxford Street area attracted by the promise of high-end shopping and restaurants. A prominent sex shop doesn't fit with this future promise.

o The junction of Dean Street and Oxford Street will be a transit hub for arriving shoppers, families and overseas visitors. A sex shop must not be arriving visitors first retail experience of Oxford Street

We urge the Council not to allow the renewal of the license application.

Best regards

[REDACTED]

## OBJECTION 2

Nelson, Nicholas

From: [REDACTED]  
 Sent: 11 February 2014 20:45  
 To: General Licensing  
 Cc: [REDACTED]  
 Subject: 14/00509/LISEXR, Harmony Adult Centre

Follow Up Flag: Follow up  
 Flag Status: Completed

Dear Sirs,

Ref: 14/00509/LISEXR, Harmony Adult Centre

We wish to object to the renewal of the premises license for Harmony Adult Centre, 103A Oxford Street, London, W1D 2HG. We are a local family, and we live at [REDACTED]. We can be contacted on this email address or by telephone [REDACTED].

Our grounds for objecting are:

- Harmony is not in keeping with the overall retail mix of Oxford Street, which is renown for its fashion retail and high end department stores.
- Harmony's retail offering and position is contradictory to the mission of The New West End Company, which states it is "dedicated to driving forward London's West End as the world's top shopping destination". As the body elected by West End businesses to ensure London's West End shopping experience is world class, and its aims supported by Westminster Council, we assume they can not be supportive of Harmony in the mix as a credible Oxford Street retailer.
- Harmony's prominent position on Oxford Street makes it's branding and message clearly visible to those underage – be they pedestrians or passengers in cars, taxis and buses – and this is entirely inappropriate given the 'family day-out' draw of shopping in the West End and the otherwise family orientated retail mix of Oxford Street.
- Harmony's continuing operation as a sex shop would be against Westminster Council's own position in regard to reducing the volume of sex establishments in the Soho area and its support of the area's regeneration and transformation.
- A significant part of the regeneration programme supported and allowed by Westminster Council for the Soho and Fitzrovia area, has been the bringing back to life of out-dated and redundant office buildings as private residences, and many are close to the site of Harmony; Paramount House, The Quadrangle, The Hat Factory and Beaver Building and the (soon to be completed) Ampersand to name a few - with some developments only completed and occupied over the last 12-months. These are not simply buy-to-let investment properties by overseas landlords, but real homes for real families. The Hat Factory and Beaver Buildings is almost completely owner occupied, and several are occupied by families with teen and pre-teen children.

The positioning of a sex shop in close proximity to the rising volume of family residential housing is increasingly unacceptable.

The site of Harmony's retail store on the corner of Oxford Street and Great Chapel Street is concerning and impacting detrimentally on the area given the extensive work being undertaken by the Crossrail project. The hoarding around the Crossrail site has transformed Great Chapel Street for the worse from a full-width street to a narrow single-file passageway (with recessed doorways) and the assumption is that this hoarding will remain in situ for a considerable time to come (several years) given the Crossrail building programme.

- o A highly visible and obvious adult sex shop and a narrow passageway now make Great Chapel Street as a pedestrian route a definite no-go street for many - particularly young women. Oxford Street visitors and local residents, male or female, and especially those on their own, should not be made to feel vulnerable in what should be a world class shopping street and area.

- o Westminster Council has an obligation to make Oxford Street and its surrounding streets as welcoming and non-threatening as possible to all its visitors and the increasing number of residents in the Soho and Fitzrovia areas. The type of retail establishment is much a part of achieving this as is good street lighting and access. Crossrail's continued impact on Great Chapel Street can not be reversed, but the additional impact of a sex shop on the corner of Great Chapel Street can.

The arrival of Crossrail:

- o Crossrail will have a huge impact in delivering significantly increased numbers of visitors (UK and overseas) to the Oxford Street area attracted by the promise of high-end shopping and restaurants. A prominent sex shop doesn't fit with this future promise.

- o The junction of Dean Street and Oxford Street will be a transit hub for arriving shoppers, families and overseas visitors. A sex shop must not be an arriving visitor's first retail experience of Oxford Street.

We urge the Council not to allow the renewal of the license application.

Best regards,

[REDACTED]



## OBJECTION 3

Nelson, Nicholas

---

From: [REDACTED]  
Sent: 12 February 2014 14:33  
To: General Licensing  
Cc: [REDACTED]

Follow Up Flag: Follow up  
Flag Status: Completed

Good Afternoon,

We are responding to your invitation to comment on the proposed relicensing of Harmony in Oxford Street. This establishment is simply not appropriate for an area which has acquired the reputation of being "the finest shopping street in the world". This end of Oxford Street is gradually losing its downmarket image, and we look forward to the less desirable establishments being replaced with retail businesses of quality to enhance not devalue the area for both residents and tourists.

Yours Sincerely,

[REDACTED]



## Schedule of conditions

### Special conditions attached to the existing licence:

1. Notwithstanding Standard Condition no. 4, the premises may be kept open for the purpose of this licence from 23:00 on each of the days Monday to Saturday to 01:00 on the day following, and from 23:00 to 00:00 on Sundays.
2. There shall be no pictorial or diagrammatical representations of full or implied nudity to advertise what is going on inside the premises.
3. No music or other sounds shall be audible outside the premises.
4. All windows shall remain obscured and if displayed any signs must be discreet and fixed no lower than five feet above the ground.
5. Steps shall be taken to ensure the quiet and orderly entry and exiting of the premises by staff and patrons.
6. The Council shall be advised of managers, proposed managers and changes of managers.
7. The licensee shall ensure that the highway and public spaces in the vicinity of the premises are kept free of litter from the premises at all material times to the satisfaction of the Council.
8. No illegal unauthorised advertisements of any kind (including placard, poster, sticker, flyer, picture, letter, sign or other mark) is inscribed or affixed upon the surface of the highway, or upon any building, structure, works, street furniture, tree or any other property, or is distributed on the street to the public, that advertises or promotes the establishment, its premises, or any of its events, facilities, goods or services.
9. All waste is properly presented and placed out for collection no earlier than 30 minutes before the stated collection times.

### Standard Conditions relating to all Sex Establishment premises (excluding Sexual Entertainment Venues):

#### Standard Condition 3:

The licence or a clear copy shall be prominently displayed at all times so as to be readily and easily seen by all persons using the premises.

**Standard Condition 4:**

The premises shall not, for any purpose of the licence, be opened before 0900 hours and shall not be kept open beyond 2300 hours.

**Standard Condition 5:**

(a) The licensee shall take all reasonable precautions for the safety of the public and employees and except with the consent of the Council, shall retain control over all portions of the premises.

(b) No poster, advertisement, photograph, sketch, synopsis or programme shall be displayed by or on behalf of the licensee at the licensed premises or at any other public place except in accordance with the Town and Country Planning (Control of Advertisements) Regulations 1992 or any Order amending or replacing the same.

(c) The premises may not be used under the terms of the licence unless and until any necessary permission and/or consents have been obtained pursuant to the Town and Country Planning Act 1990, the London Building Acts 1930-1939 and the Building Act 1984 or any legislation amending or replacing the same.

**Standard Condition 6:**

(a) The licensee or some responsible person over 18 years of age nominated by him in writing for the purpose shall be in charge of, and upon, the licensed premises during the whole time that they are open to the public. Such written nomination shall be continuously available for inspection by a police officer or an officer authorised in writing by the Council.

(b) The person in charge shall not be engaged on any duties which will prevent him from exercising general supervision and he shall be assisted as necessary by suitable adult persons to ensure adequate supervision. The person in charge should be conversant with these conditions, a copy of which should be held on the premises.

(c) A notice showing the name of the person in charge of the premises at the time they are open under the licence shall be conspicuously exhibited in a position where it can be easily seen by customers.

(d) All members of staff shall be easily identifiable as such. If required by the Council in writing the licensee shall ensure that during the hours the premises are open for business every employee or person (apart from, where employed, hostesses or other companions) working in the licensed premises wears a badge of a type approved by the Council indicating his name and that he is an employee or person working in the premises.

**Standard Condition 7:**

(a) The licensee shall maintain good order on the premises and in particular shall ensure that none of the following shall take place:

- (a) Unlawful possession and/or supply of drugs controlled by the Misuse of Drugs Act 1971;
- (b) Indecent behaviour, including sexual intercourse;
- (c) The offer of any sexual or other indecent service for reward;
- (d) Acts of violence against person or property and/or the attempt or threat of such acts.

(b) The licensee shall ensure that the public are not admitted to any part or parts of the premises other than those which have been approved by the Council.

(c) The licensee or any other person concerned in the conduct or management of the premises shall not seek to obtain custom by means of personal solicitation or touting from the premises, immediately outside the premises or in the vicinity of the premises, nor allow the premises to be used by prostitutes.

**Note:** Soliciting includes the distribution of leaflets unless authorised by a consent under section 4 of the London Local Authorities Act 1994

(d) No person under the age of 18 shall be admitted to any part of the premises which is used as a sex establishment or be employed in the business of the sex establishment.

(e) No poster, photograph, sketch, painting or any form of advertisement or display shall be displayed by or on behalf of the licensee on, outside or within the premises in a position where it is visible to the public if the Council regards it as unsuitable for exhibition to the public. If the licensee is notified in writing that the Council objects under this rule to a poster, photograph, sketch, painting, advertisement or display such poster, photograph, sketch, painting, advertisement or display shall be removed or completely obscured from sight.

**Standard Condition 8:**

(a) The entrances to the premises shall be of a material or covered with a material which will render the interior of the premises invisible to passers by.

(b) Windows and openings to the premises other than entrances shall either be obscured or with the consent of the Council shall have suspended behind them, in a position and at an altitude approved by the Council, opaque screens or blinds of a type and size approved by the Council.

**Standard Condition 9:**

No change of use of any portion of the premises from that approved by the Council shall be made until all necessary consents have been obtained from the Council. For the avoidance of doubt this includes a change from one class of sex establishment (e.g. a sex shop) to a different class of sex establishment (e.g. a sex encounter establishment).

**Standard Condition 10:**

No alterations (including temporary alterations) shall be made to the premises, without the prior written consent of the Council. This condition shall not require notice to be given in respect of routine maintenance works. Where works necessitate the premises being closed for a period of time, the premises shall not reopen for the purpose of the licence, until the licensee has been notified in writing by the Council of the satisfactory completion of the work.

**Standard Conditions relating specifically to sex shops:**

**Standard Condition 29:**

All sex articles and other things displayed for sale, hire, exchange or loan within a sex shop shall be clearly marked to show to persons who are inside the sex shop the respective prices being charged.

**Standard Condition 30:**

All printed matter offered for sale, hire, exchange or loan shall be available for inspection prior to purchase and a notice to this effect is to be prominently displayed within the sex establishment.

**Standard Condition 31:**

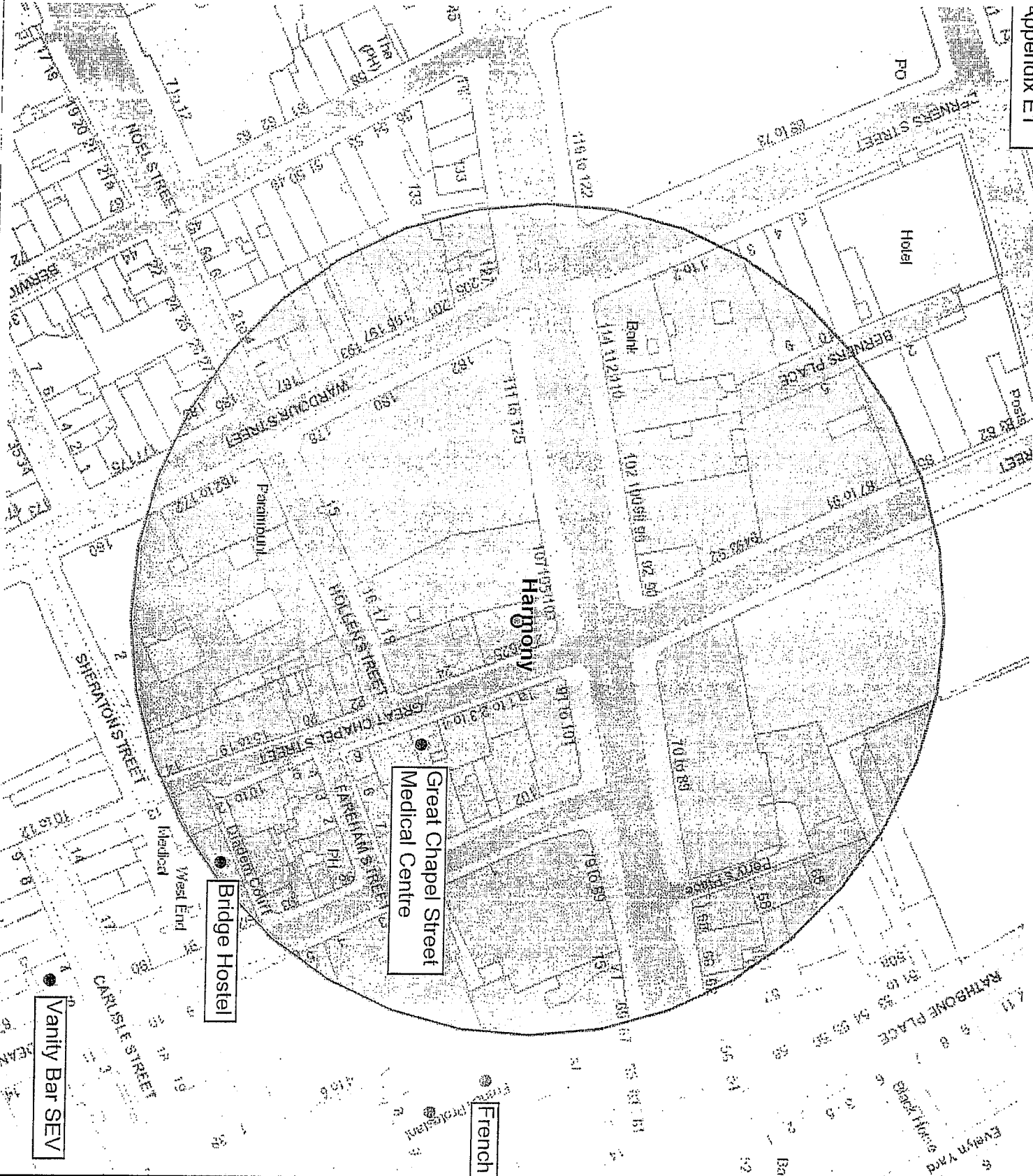
No film or video shall be exhibited, sold or supplied unless it has been passed by the British Board of Film Classification or such other authority performing a similar scrutinising function as may be notified to the licensee by the Council, and bears a certificate to that effect and is a reproduction authorised by the owner of the copyright of the film or video film so certified.

**Licence history of the premises**

<b>Application</b>	<b>Details of Application</b>	<b>Date determined</b>	<b>Decision</b>
New sex establishment application 03/03608/LISEXN	Application for a new sex shop licence	09.03.2004	Granted by Licensing Sub-Committee
Renewal of sex establishment licence 05/00623/LISEXR	Application to renew the sex shop licence	06.05.2005	Granted under delegated authority
Renewal of sex establishment licence 06/00866/LISEXR	Application to renew the sex shop licence	31.05.2006	Granted under delegated authority
Renewal of sex establishment licence 07/01253/LISEXR	Application to renew the sex shop licence	07.08.2007	Granted under delegated authority
Renewal of sex establishment licence 08/00801/LISEXR	Application to renew the sex shop licence	22.05.2008	Granted under delegated authority
Renewal of sex establishment licence 09/00714/LISEXR	Application to renew the sex shop licence	25.06.2009	Granted under delegated authority
Renewal of sex establishment licence 10/00587/LISEXR	Application to renew the sex shop licence	08.09.2010	Granted under delegated authority
Renewal of sex establishment licence 11/00846/LISEXR	Application to renew the sex shop licence	18.05.2011	Granted under delegated authority

Renewal of sex establishment licence 12/00455/LISEXR	Application to renew the sex shop licence	20.06.2012	Granted under delegated authority
Renewal of sex establishment licence 13/00576/LISEXR	Application to renew the sex shop licence	23.07.2013	Granted under delegated authority
Renewal of sex establishment licence 14/00509/LISEXR	Application to renew the sex shop licence		<b><i>Pending application</i></b>





**Harmony, 103A Oxford Street**

- <all other values>
- Primary
  - Secondary
  - Faith Groups
  - Hostels - Special Needs Schen
  - Live Sex Establishments
  - Westminster Boundary
  - Westminster Boundary
  - Westminster Boundary

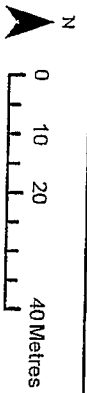
French Protestant Church

Great Chapel Street  
Medical Centre

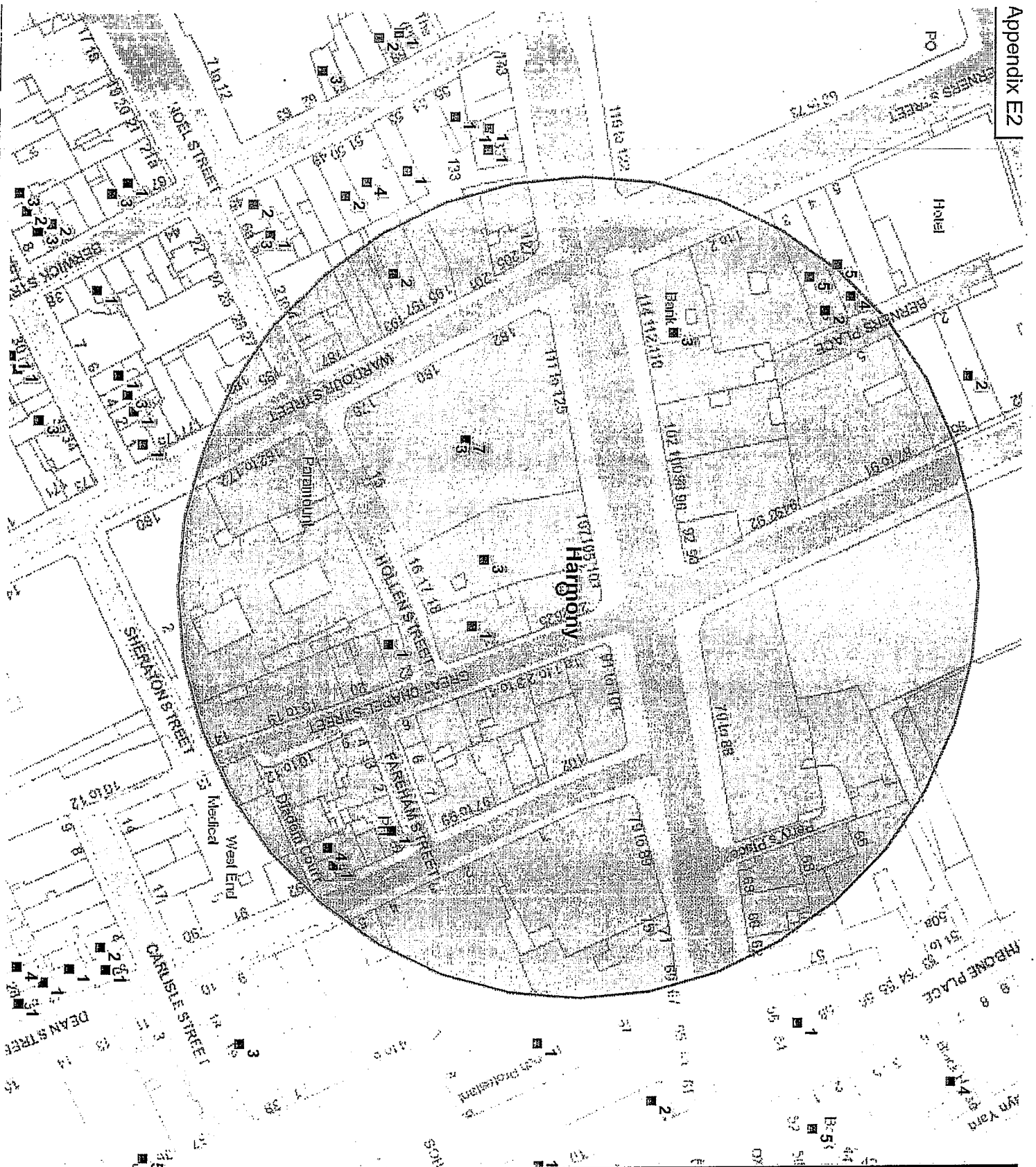
Bridge Hostel

Vanity Bar SEV

City of Westminster



This product includes mapping data licensed from Ordnance Survey with the permission of the Controller of Her Majesty's Stationery Office.  
 © Crown copyright and/or database right 2013.  
 All rights reserved. Licence number LA 100019597  
 Data Source:  
 Date: 21/11/2014

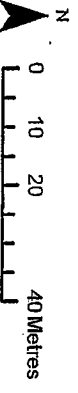


**Harmony, 103A Oxford Street**

- <all other values>
- Proposed Residential Units
- Residential Units
- ▲ Under Construction
- ▣ Westminster Boundary
- ▣ Westminster Boundary



City of Westminster



This product includes mapping data licensed from Ordnance Survey with the permission of the Controller of Her Majesty's Stationery Office.  
 © Crown copyright and/or database right 2013.  
 All rights reserved. Licence number LA 100019597

Data Source:  
 Date: 21/11/2014

APPENDIX F



# HARMONY

## #MERRYKISSMAS

HARMONY  
THE ADULT STORE  
[www.harmonystore.com](http://www.harmonystore.com)

1. *[Illegible text]*
2. *[Illegible text]*
3. *[Illegible text]*

### Merry

### ROCKS-OFF

IT'S GONNA BE A SEXY NEW YEAR



GPS: 51.5158 0.1219

