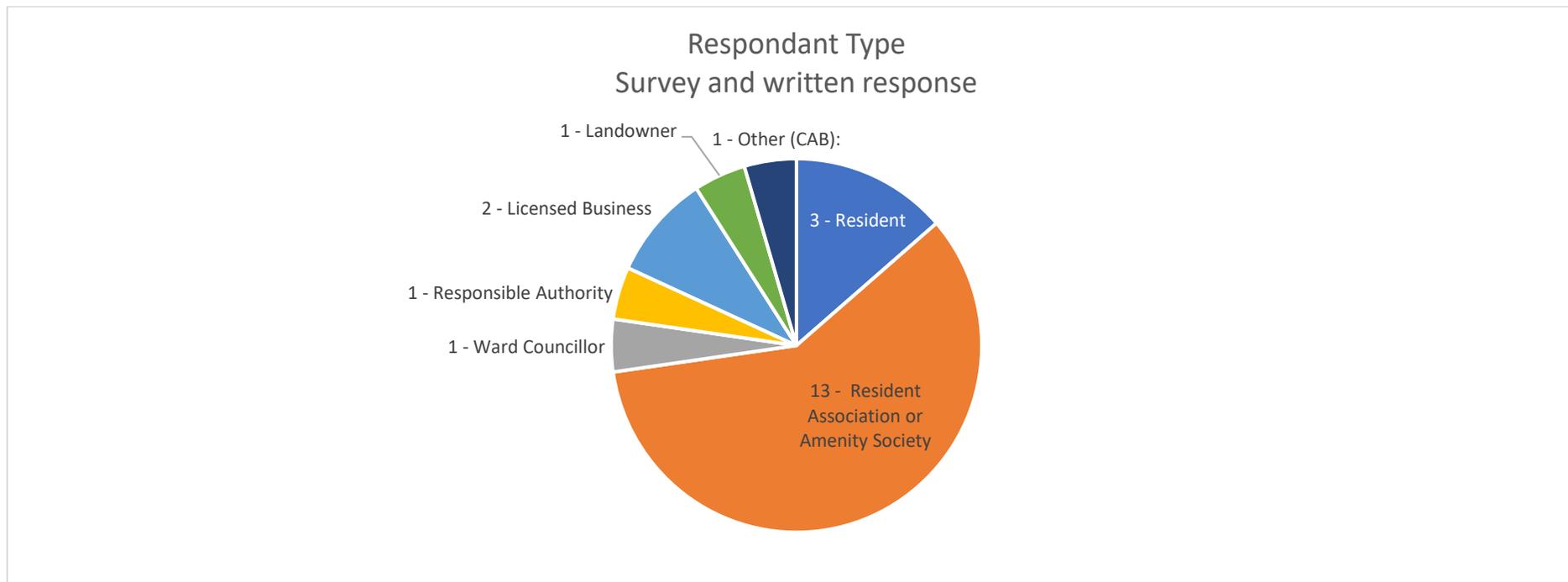


Appendix 3 – Full list of consultation questions and submissions



SURVEY RESPONSES (Smart Survey and 'Paper' versions)

9. New Policy - Ancillary Delivery of Alcohol and/or Late-Night Refreshment Policy DEL1 Do you agree with the general policy approach for ancillary deliveries of alcohol and/or late-night refreshment?

Answer Choices		Response Percent	Response Total
1	Yes	62.5%	10

9. New Policy - Ancillary Delivery of Alcohol and/or Late-Night Refreshment Policy DEL1 Do you agree with the general policy approach for ancillary deliveries of alcohol and/or late-night refreshment?

2	No	18.8%	3
3	No response/Skipped	18.8%	3

People has been asking for this service for some time now but we explained that we don't have a licence

I think these are great services and require no regulation or interference. Leave them be!

Such refreshment might be pleasant if one's life is sufficiently chaotic not have anticipated lacking food and drink in one's own home. Generations of workers have managed night shifts without needing the delivery of meals and alcohol was and presumably still is banned at the workplace. The proposal is not essential and the cost it would impose on society (including the NHS from obesity, liver failure and alcohol poisoning). Anonymous delivery individuals (supplying booze, junk food or organic food ingredients from premises within Westminster or outside) flitting around in ever greater number, often in breach of the Highway Code) even silently on electric- or pedal-cycles with crash-helmets detracts from the calmness and sense of community which many residents need and value. Deliveries from dedicated premises (not "shops") within Westminster should not be permitted if in residential areas. Although the Council's claims to be tirelessly committed to be a leader in combating the collapsing climate and air quality (e.g. Clauses X6, X53 and X55), any increase in vehicles for supplying a delivery hub or delivery cycles - whether electric or not - will for the foreseeable future be recharged with electricity from power stations using carbon-based fuel (and their manufacture will have had a substantial carbon and other ESG footprint.

But there are three qualifications:

1. Late night delivery services from premises that are close to residential streets can give rise to unnecessary noise. Hours for the provision of delivery services may often need to be curtailed.
2. Problems with delivery services are not addressed by the applicant for a licence ensuring that "any third party, to which they have contracted their delivery service, have sufficient procedures and mitigation in place to ensure that their delivery personnel do not create public nuisance either at the premises where the delivery originates and / or at the delivery destination."
3. There needs to be much tighter regulation of delivery drivers and the companies for whom they work. A large part of the problems arising from delivery services is that most drivers appear to use "L" plates and drive very aggressively (eg. driving at high speed, overtaking dangerously and going through red lights at traffic intersections and pedestrian crossings).

Unlike other polices you don't propose a set of requirements to be met for applications outside the Cumulative Impact Zone or within the CIA.

There should be a presumption against within the CIA.

We are particularly concerned about use of premises for this type of activity in the evenings and at weekends. This would cause an increase in traffic and associated disturbance to residents, particularly in and around Charlotte Street and the boundary with London Borough of Camden.

Accurately describes residents' concerns in our area.

The COVID19 Pandemic has accelerated a move to on-line purchases and hence deliveries and so there is a need to have a specific policy related to this, especially as this can have a number of impacts on the Licensing Objectives. It will be helpful that the SoLP sets out the risk factors in volved and sets the

policy basis for considering these.

That being the case, it is right that the SoLP assists applicants and indeed potential objectors by setting out the potential risk factors associated with deliveries of alcohol/late night refreshment and setting policy parameters under which such applications can be specifically considered.

We do have some concerns about specific aspects of the proposed policy and these are set out below. We are particularly concerned about the idea that the Policy will be generally to grant permission, even in areas under significant amounts of stress such as the CIZ. We have set these out in the appropriate boxes below.

It is crucial that responsible authorities make appropriate enquiries of applicants when they receive and application which includes off sales, to ascertain the nature of the proposed off sales and whether a delivery service is intended.

Whilst we welcome the aims of the policy to address the requirement for a premises licence, the impact on the licensing objectives and the increase in public nuisance to residents, there are areas of concern which we highlight below;

1. We note the difference in the policy framework in comparison to Clauses A and B within the new policies SHP1 and DC1, and in the majority of the existing premises uses policies, Clause B stating 'Applications within the West End Cumulative impact Zone...' has been omitted. We are concerned that the West End CIZ is not mentioned within this policy and therefore the protection which it affords to residents is lost.

2. We oppose the proposed Core Hours Policy for the premises type, this would typically permit off sales from restaurants and bars until 11.30pm, 12am and 10.30pm.

It is assumed this policy arises as the increase in deliveries during the pandemic. Whilst there is not currently a specific policy in the current SLP, takeaway and delivery elements are considered as part of applications and conditions imposed as a result. Without a designated policy this is done on a case by case basis which is perhaps more appropriate than a blanket policy, especially where this is an ancillary element.

It would be perhaps be more appropriate to have this as a temporary policy and/or reconsider after the worst of the Covid pandemic has passed. It would give time to assess if there will be a long-term delivery trend arising from Covid.

We agree that it is necessary for the Statement of Licensing Policy (SoLP) to adapt and respond to developments in licensing law and practice in a timely manner. Ancillary deliveries of alcohol and food have increased in popularity in recent years, particularly so during the Covid -19 pandemic. Indeed, central Government has legislated under Business and Planning Act 2020 to deregulate off sales of alcohol in a way which permits the vast majority of licensed premises to provide off sales, including deliveries, where they could not before. This trend is likely to continue, and after the end of the period of time covered by Business and Planning Act and successor legislation, we expect the licensing authority to receive applications to permit off sales and/or late-night refreshment by way of delivery.

That being the case, it is right that the SoLP assists applicants and indeed potential objectors by setting out the potential risk factors associated with deliveries of alcohol/late night refreshment and setting policy parameters under which such applications can be specifically considered.

However, from discussions we have had with amenity societies during the consultation period and from our own experiences of representing 'other persons' on applications which would in future fall under DEL1, we do have some comments and reservations on specific aspects of the proposed policy. We have set these out in the appropriate boxes below. In particular, we have been asked to reflect concern that in the West End CIZ, the sheer concentration of licensed premises may result in an additional cumulative impact on residents if the proposed policy approach is implemented.

We agree that it is crucial that responsible authorities make appropriate enquiries of applicants when they receive and application which includes off sales, to ascertain the nature of the proposed off sales and whether a delivery service is intended.

Given the increase in the use of delivery services, particularly 3rd party delivery services, by licensed premises, we agree that it is necessary to have specific provision in the Statement of Licensing Policy for this.

We already have experience of premises using a delivery service to supply alcohol and/or late night refreshment, and experience of making representations on applications which seek off sales of alcohol with or without a specific reference to whether it is intended for delivery.

But have other concerns, please see attached letter

10. Do you agree that the criteria in Clause A of this policy cover all of the considerations necessary for an application that includes a delivery service?

Answer Choices		Response Percent	Response Total
1	Yes	31.3%	5
2	No	43.8%	7
3	No response/Skipped	25%	4

I agreed that this policy cover all the considerations necessary for an application that includes a delivery service

See the qualifications above.

Reasons above.

See answer to 9 (above).

We agree that the criteria in Clause A cover many of the considerations. However, we are concerned about some aspects.

1. We are concerned that the proposal to 'generally grant subject to' provision is not strict enough and could cause problems and add to cumulative impact.
2. Clause A does not refer to the CIZ policy. The effect that this may have effect of appearing to diminish the importance of the CIP policy, rather than making it a prime consideration within the area
3. Clause A.2. We do not see why off-sales via delivery should be permitted until the end of Core Hours when off sales of alcohol have usually been restricted by condition to 11pm. We have little confidence that the use of a "home of business address" will prevent the alcohol, or food, delivered being consumed on the street. The restriction on off-sales is to reduce drinking in the street because this can give rise to more crime and nuisance than is typical within licensed premises.
We see believe the risk to the Licensing Objectives of allowing off-sales by delivery to continue beyond 11pm outweigh any commercial benefits.
4. Allowing off-sales to core hours could mean that a premises whose on sale licence ends at 10pm could continue to operate a delivery or off-sales service until 23:00.

This will add to nuisance in the vicinity. The deliveries should end at the hours of the premises for on-sales, or 23:00, whichever is earlier.

5. There may be areas of the city where the noise and nuisance likely to arise from a delivery service means that no delivery service should be permitted, or an earlier terminal hour for off sales for delivery should be imposed. Each case needs to be considered on its merits.

We support the inclusion in Clause A of 1,3,4,5,

We disagree with the following,

1. Clause A. 2: 'The hours when delivery will take place is within the relevant Core Hours for that premises use'. We disagree with this statement, it will allow the majority of premises to provide off sales until 11.30pm, 12am and 10.30pm. We highlight the 11pm and 10.30pm hours of the new Shops (off-sales of alcohol) Policy SHP1 and Delivery Centres Policy DC1, and the majority of new licences have the Model Condition 16 where off sales are not permitted after 11pm. This is an important condition in the West End CIZ with its huge number of restaurants, bars and pubs tightly packed together along the narrow streets of Soho. 11pm safeguards residents against noise disturbance from delivery drivers congregating in groups waiting on the streets for a job and from the noise of the mopeds as they exit the area.

2. The policy as proposed will increase public nuisance to residents and thereby fail to promote the licensing objective PN1 and increase cumulative impact, we therefore ask the hours mirror that of SHP1 and DC1 and be restricted to 11pm Mon - Sat and 10.30pm Sun.

Whilst unlikely, where a premises already benefits from hours beyond Core Hours, or successfully applies for hours beyond Core in a new application, the presumption to grant should not be limited to Core Hours only – it should extend to the hours permitted by the premises licence.

We agree that the criteria in Clause A cover many of the considerations. However, we are concerned about some aspects.

1. There is some concern, particularly in the West End CIZ, that the 'generally grant subject to' provision is not strict enough and could cause problems and add to cumulative impact.

2. Following on from this, Clause A does not refer to the CIZ policy itself (which would bring in the additional requirement for an applicant to demonstrate that they will not add to cumulative impact/are a 'genuine exception' to CIP1, depending on the type of premises use under which the application falls). We appreciate that it could be said that it is implicit that the CIP1 policy would in any event be taken into account due to the reference to 'other policies' in A and the reference to the premises use policies in A.2. However we have had feedback to the effect that this may have effect of appearing to diminish the importance of the CIP policy, rather than placing it front and centre as the prime consideration.

3. Clause A.2. In our experience, off sales of alcohol have usually been restricted by conditions to 11pm (or earlier, depending on the merits of an application) - see for example Model Conditions 16, 19, 20 and 56. We therefore have some reservations about Clause A 2: 'The hours when delivery will take place is within the relevant Core Hours for that premises use'.

The core hours for premises use for restaurants, pubs and bars (which are expected to be the policies most frequently relevant to these applications) are 11.30pm Mon-Thurs, midnight Fri-Sat, 10.30pm Sun. Many premises licences will have conditions restricting off sales (and therefore deliveries) to 11pm or earlier. There is some disquiet at a policy which would 'generally grant' a later hour than this.

In addition, we note that MC66 used to contain a provision that '(v) which do not provide any take away service of food or drink after 23.00'. This provision does not appear in the most recent list of model conditions. We think it should return.

We note also that the 'core hours' for off sales from 'delivery centres' and traditional off licences would remain at 11pm, and wonder why DEL1 should be different.

4. There may well be areas of the city where associated noise and nuisance likely to arise from a delivery service means that no delivery service should be permitted, or an earlier terminal hour for off sales for delivery should be imposed. Obviously, each case would be looked at on its merits with reference to e.g. PN1.

5. We agree that the considerations at A.5 and 6 are important and it is helpful that the policy flags these issue.

6. We feel that many if not all of the criteria in Clause B could usefully also apply to applications which fall under Clause A. Indeed, we have raised such issues on applications already which would in future fall within Clause A. For instance, at B.3., whether the premises are located in a 'predominantly residential area' should be a general consideration. Whilst we appreciate that it could be said that the same consideration mutatis mutandis would be considered under PN1 in any event, not including it in Clause A could imply that the consideration is of less important to those applications, when depending on the circumstances of the case it could be just as important.

7. We note that the SCZ policy is included, meaning that applicant in areas which were until recently in CIZs (i.e. Queensway/Bayswater, and Edgware Road) will have to demonstrate compliance with the SCZ Policy.

Yes, we agree that the criteria cover the main considerations which come into play on such applications. A particular application may raise different/other issues, but these could be raised under the policy notwithstanding that they are not in the criteria.

However, off sales of alcohol have usually been restricted by conditions to 11pm (or earlier, depending on the merits of an application) - see for example Model Conditions 16, 19, 20 and 56. We therefore have some reservations about Clause A 2: 'The hours when delivery will take place is within the relevant Core Hours for that premises use'. We are uneasy with deliveries being permitted after 11pm as a result of new or variation applications, and our residents may be opposed to deliveries after an earlier time.

Additional considerations, please see attached letter

11. If an application does not meet Clause A, the application will be considered on its own merits, subject to other policies within this statement and a number of considerations. Do you believe the considerations listed in Clause B are sufficient to assist in the determination of such applications?

Answer Choices		Response Percent	Response Total
1	Yes	37.5%	6
2	No	31.3%	5

11. If an application does not meet Clause A, the application will be considered on its own merits, subject to other policies within this statement and a number of considerations. Do you believe the considerations listed in Clause B are sufficient to assist in the determination of such applications?

3	No response/Skipped	31.3%	5
---	---------------------	-------	---

<p>I believe that the delivery of alcohol should be firmly limited to core hours. Such deliveries constitute "off-sales". Whilst the premises from which such deliveries take place may not be located in residential areas, it is likely that their destinations (end-points) will be, and this may lead to loss of residential amenity and cause public nuisance. The policy should take into consideration likely impact of additional alcohol consumption at the point of delivery (destination).</p>
<p>I believe the considerations listed in clause b are sufficient to assist in the determination of such applications</p>
<p>See the qualifications above.</p>
<p>Reasons above. it is not possible to do below within the CIA as evidenced in the report on the CIA's. If the application is located within a Special Consideration Zone, have they demonstrated that they have taken account of the issues identified in that area and provided adequate mitigation</p>
<p>Probably - but not convinced that the council has enough powers on some aspects to do more than make suggestions - eg., quiet vehicles, not use single-use plastics</p>
<p>We believe that many of the criteria in Clause B are also relevant to Clause A and should be included there. The difference between A and B in terms of criteria is not apparent to us. For example if a business meets all of the requirements to be in Clause A but is situated in a "predominately residential area" should it be under A or B? We believe that much of the clauses can be combined, and the only difference should be whether the time for the delivery service is proposed to be before or after 23:00, and whether the service is ancillary to the main use.</p>
<p>1. We note the difference in the framework of this policy when comparing Clauses A and B to the new policies SHP1 and DC1 (and in the vast majority of the premises uses policies) which state, Clause A. 'Applications outside the West End Cumulative Zones...' and Clause B 'Applications inside the West End Cumulative Impact Zone....' we ask why there is a difference with this policy?</p>
<p>2. We note the Special Consideration Zone is mentioned in Section A and B but nowhere within this policy is the West End CIZ raised, we are particularly concerned of this omission and that its inclusion was not considered essential in order to protect residential amenity and promote the licensing objectives in an area with the highest number of licensed premises in Westminster.</p>
<p>3. We ask that Clause B should refer to applications made inside the West End Cumulative Impact Zone and mirror Clause B of the Delivery Centre Policy DC1 including points 1,2,3 - the applicant has demonstrated that they will not add to cumulative impact within the CIZ and 5.</p>
<p>4. There are differences in the requirements between Clause A and B, in our view Clause B requirements should also be included in Clause A.</p>
<p>Reference to "predominantly residential area" is still unclear. The definition at Clause C does little to assist. See further at Q12 below.</p>

B.9 would best refer to the history of the licence holder, rather than the premises to take into account transfers and new licences which should not be treated detrimentally for actions of previous licence holders/operators.

Yes, although as set out at Q10, we feel that many if not all of the considerations should also be considerations under Clause A.

The considerations in Clause B (and the ensuing policy narrative) cover the issues which we have seen arise on previous applications and we consider it very helpful for the SoLP to set these out.

Yes, although many of the considerations should also be considerations under Clause A.

12. Do you have a view on the definition in Clause C of 'a predominately residential area'?

Almost all of Westminster is residential. Exceptions are characterised by late night opening (e.g. Edgware Road, Soho)

It seems to be a logical definition.

We would say that Hereford Road is definitely a predominantly residential area.

This will not work in high density mixed use area.

In an area such as Fitzrovia and in and around Charlotte Street the area is mixed. Some streets are almost all residential but most have a mix of residential and commercial. We think that the clause should state "residential or mixed-use area".

It would be useful if this survey had actually pointed to the definition, or quoted it; as it is, we are not certain what text in the documents provided, is referred to.

For us this "predominantly residential " means a street with no commercial activities, or very few; however, in our area, such streets often have immediately adjacent streets with retail/hospitality at ground level. A single premises can cause a severe amount of nuisance. But in a situation with a commercial "high street", we often have large mansion blocks above the shops and densely residential side streets, which means that a great many residents are affected by noise and nuisance. Is this a predominantly residential street or not?

We dislike this phrase or its definition, and do not understand why it is referenced in clause B but not clause A.

A premises may not be in a 'predominantly residential area' but may be immediately adjacent to residential accommodation. 'Predominant' residential use suggests that it must be the main use in the area.

We prefer the criteria in PN1, which is 'areas of residential accommodation and where there is residential accommodation in the proximity of the premises' and 'stricter conditions will be imposed on premises licences in areas that have denser residential accommodation or have residential accommodation close to them'.

This allows for a better assessment of likely nuisance based on proximity of residential accommodation which, although it may be a relatively low overall use in the area, is nevertheless a relevant use directly next to a premises.

1. 'Predominantly residential' will be difficult to define and limited in value especially as nuisance can occur from one premises next to a residential block in a street with few residential properties. Noise nuisance and disturbance is a concern for residents, this is caused by delivery drivers sitting in groups in certain streets whilst they wait for a call and from the noise of their mopeds as they leave the area.

2. Our view is this should be removed from all applications within the Cumulative Impact Zone. SLP 2021 Cumulative Impact Policy CIP1 clearly states these policies are directed at the global and cumulative effects of licences on an area as a whole (D.16) and D.23. ...'the absence of residential accommodation in the vicinity of the premises within the West End CIZ is not a reason for exception. The nature of cumulative impact is that it is cumulative and affects not only the immediate vicinity of the premises, but a wider area.' The Prevention of Public Nuisance PN1 licensing objective also adequately addresses the proximity of residential accommodation.

3. Overall the policy should not attempt to define a 'predominantly residential street' this should be removed as regardless of where they are living residents can still suffer noise disturbance from delivery drivers in the West End CIZ.

The definition is unclear and needs further clarification.

How big is the 'area' that is to be determined? Will it be by reference to a set radius around the premises in question, and, if so, what will that radius be? Will the set area need to be >50% planning use residential, or a greater figure? >75%? What percentage will determine "predominant"?

Will there be a mapping system online that will allow applicants to determine whether their area is considered to be "predominantly residential"?

Feedback we have received is not in favour of this phrase or its definition, nor that it is referenced in clause B but not clause A. This is in contrast to DC1, where the consideration would apply to applications within core hours (11pm/10.30pm).

We feel there is a lack of clarity and will lead to arguments on the definition of 'predominantly' and 'area'. A premises may not be in a 'predominantly residential area' but may be immediately adjacent to residential accommodation. 'Predominant' residential use suggests that it must be the main use in the area.

We note that the criteria used in PN1 is 'areas of residential accommodation and where there is residential accommodation in the proximity of the premises' and 'stricter conditions will be imposed on premises licences in areas that have denser residential accommodation or have residential accommodation close to them'.

We believe that the PN1 criteria are to be preferred, as they allow for a better assessment of likely nuisance based on proximity of residential accommodation which, although it may be a relatively low overall use in the area, is nevertheless a relevant use directly next to a premises.

It should also be noted that the CIP policy at D23 refers to (our emphasis) 'Proximity to residential accommodation is a general consideration with regard to the prevention of public nuisance. However, the absence of residential accommodation in the vicinity of premises within the West End Cumulative Impact Zone is not a reason for exception.'

We are uncomfortable with this definition, as we feel there is a lack of clarity and will lead to arguments on the definition of 'predominantly' and 'area'. We also feel that a more granular approach is needed. A premises may not be in a 'predominantly residential area' but may be immediately adjacent to residential accommodation.

Need care of residents in mixed-use areas especially in central London need to be assured that they will also be protected (for example those living close by or over a site).

Additional considerations, please see attached letter

13. Is there anything that has not been included, or something that needs further clarification in Policy DEL1, such as reasons for this policy, that you think should be?

See the qualifications above.
All these proposals should take account of the Cumulative Impact Assessment 2020 Report, but they do not.
This seems clear, but we are uneasy about the extents of the council's powers. Provision of toilets for couriers cannot be enforced? An example in our area is the nuisance caused in Siddons Lane by delivery drivers hanging around, and the proliferation of litter in quiet streets surrounding Melcombe Street.
Noisy vehicles? There is a cul-de-sac mews in the area with a large mansion block at one end. There is no access to this block from the mews, but satnav still sends vehicles up to the end of the mews. (despite requests to Google maps and WCC's traffic dept). Most of these vehicles are noisy motorbikes or scooters with no regard for sleeping residents. Once at the end of the mews, the puzzled deliverymen often knock on doors at any hour, or attempt to deliver to houses in the street with numbers that correspond to flat numbers. This has got worse in recent years.
As above, reference to the West End Cumulative Zone has been omitted and we ask that this policy follows the framework set out in SHP1 and DC1 and in keeping with the current premises uses policies.
See above.
It would be of assistance to see a track-changed version of the Policy so we can understand precisely how this policy would impact the incidental commentary in the current Policy.
It would be useful to see the proposed Model Condition(s) that are envisaged to condition the policy on the premises licence.
A lot of emphasis is placed on cleaner air and non-emission delivery. For small businesses the associated costs may not be commercially viable, however they may only utilise one or very few delivery vehicles. It may be appropriate to consider the size of the operation and/or intended delivery fleet to be used as a mitigating factor/exception to policy.
The requirement for toilet provisions in the premises for delivery drivers may not be feasible for very small premises.
Not apart from the points raised in Q10-12 above.
WCC's position on deliveries taking place after 11pm.
Additional considerations, please see attached letter
See the qualifications above.
All these proposals should take account of the Cumulative Impact Assessment 2020 Report, but they do not.

14. New Policy – Shop Policy SHP1 Are you supportive of the inclusion of a new policy for the provision of licensable activities in shops?

Answer Choices		Response Percent	Response Total
1	Yes	56.3%	9
2	No	25%	4
3	No response/Skipped	18.8%	3

If shops can't make money during normal working hours they will not survive. Their prospects would improve if no deliveries were permitted outside those hours. Implementing a system requiring dissuasive taxation for deliveries out of hours would perhaps not be feasible.

The proposal seems to be sensible.

The CIA areas are already saturated with liquor licenses & the Cumulative Impact Assessment 2020 Report sets out the negative consequences which is why there should be a presumption against granting beyond 8pm as per the current policy.

This opens up almost every commercial building to becoming a bar or alcohol led premises. We are particularly concerned about the operation of these in the evenings. This policy would lead to a free-for-all in alcohol led premises.

while we want local businesses to survive, it must be possible for them to carry out new activities without burdening residents with disruption and nuisance.

We support the inclusion of a Policy but not the choices made in its drafting. It is necessary for the Statement of Licensing Policy (SoLP) to adapt as retail premises and/or premises providing a service seeking to diversify their offer.

1. Overall it is disappointing that the solution for shop operators to compete with online retailers is its ability to sell alcohol and especially in Soho an area already saturated with licensed premises including a large number of food and drink led premises. This policy will add even more licensed premises in the West End CIZ selling alcohol to core hours, we are therefore are not supportive of the policy for On Sales or Off Sales of alcohol from non food led premises.

2. The proposed policy will permit shops to sell alcohol as on sales until core hours, Mon - Thurs: 9am - 11.30pm, Fri -Sat : 9am - 12am, Sun: 9am - 10.30pm, and off sales until 11pm, they can also provide other licensable activity for example live music / entertainment. We are concerned with core hours especially when there is no provision for a table meal or substantial food which in effect creates a number of new bars operating in the West End CIZ until 11.30pm / 12am.

3. The 2016 SLP made a specific provision for applications for premises which did not 'fit' into the existing polices, within CIP1 it stated these premises

must demonstrate that they will not add to cumulative impact (2.4.18), it considered that applications for the consumption of alcohol on the premises not beyond 8pm was unlikely to add to cumulative impact (2.4.21). The Cumulative Impact Assessment 2020 highlights an increase in cumulative impact in the West End CIZ from 6pm to 6am, the rate of crimes being 10 - 13 times higher during these times compared to the borough average.

4. With this evidence we find no justification for the proposed extension to core hours and therefore propose 8pm in the CIZ is a more balanced approach. We oppose the new proposed hours and have concerns regarding the other licensable activity in the West End CIZ, if this policy is approved it will result in an increase in cumulative impact and fail to promote the licensing objectives CD1 and PN1.

It would be of assistance to see a track-changed version of the Policy so we can understand precisely how this policy would impact the incidental commentary in the current Policy.

It would also be useful to see the proposed Model Condition(s) that are envisaged to condition the policy on the premises licence.

We agree that it is necessary for the Statement of Licensing Policy (SoLP) to adapt and respond to developments in licensing law and practice in a timely manner. This includes retail premises and/or premises providing a service seeking to diversify their offer.

That being the case, it is right that the SoLP assists applicants and indeed potential objectors by setting out the potential risk factors associated with applications for premises licences for premises which have not been constructed as or intended to be licensed premises, and setting policy parameters under which such applications can be specifically considered.

That said, from discussions we have had with amenity societies during the consultation period and from our own experiences of representing 'other persons' on applications which would in future fall under SHP1, we do have some comments and reservations on specific aspects of the proposed policy. We have set these out in the appropriate boxes below. In particular, we have been asked to reflect concern that in the West End CIZ, the sheer concentration of existing licensed premises may result in an additional cumulative impact on residents if the proposed policy approach is implemented without amendments and if this leads to significantly more retail and service premises obtaining licences.

We sympathise with the pressure on retail caused by an increase in online shopping and the Covid-19 pandemic. Licensable activities in shops may cause different/other issues than more 'traditional' licensed premises such as restaurants, and so we are supportive of a separate policy under which such applications would be considered.

We do however have reservations about the content of the policy.

15. Do you agree that the general policy approach in Clause A should be to grant applications outside the West End Cumulative Impact Zone, subject to: the application meeting other policies within the Statement, the application being within Core Hours, meeting the definition of a shop as set out in Clause C, and, if the premises are located within a Special Consideration Zone, the applicant taking account of the relevant Special Consideration Zone policy?

Answer Choices

**Response
Percent**

**Response
Total**

15. Do you agree that the general policy approach in Clause A should be to grant applications outside the West End Cumulative Impact Zone, subject to: the application meeting other policies within the Statement, the application being within Core Hours, meeting the definition of a shop as set out in Clause C, and, if the premises are located within a Special Consideration Zone, the applicant taking account of the relevant Special Consideration Zone policy?

1	Yes	31.3%	5
2	No	25%	4
3	No response/Skipped	43.8%	7

Subject to the qualifications mentioned above.

Case by case basis needed with comments from affected residents noted before granting anything.

Yes, but with some suggested changes: 1. The 'generally grant to core hours' may encourage shops and other retail premises to apply for longer hours than they really need. Most retail and service premises are closed well before 'core hours'. Under the current policies, shops etc have always been able to apply for 'core hours' under whichever policy they could come within, however in our experience, such applications have almost always been for and granted to a lesser terminal hour. 2. An earlier time could be specified for what would 'generally' be granted for 'on' sales of alcohol and other licensable activities in shops, particularly where not ancillary to a table meal or substantial food. For example a "generally grant to 20:00" provision would be sufficient for most retail premises.

"1. Although not in the CIZ shops selling alcohol until late at night will increase the impact on residents, this could result in an increase in public nuisance and higher levels of crime and disorder. We therefore do not agree with the statement, 2. 'the application is within Core Hours' we believe applications should not go beyond 8pm.

16. Do you agree that the general policy approach, set out in Clause B, should be to grant applications within the Cumulative Impact Zone, subject to: the application meeting other policies within the Statement, the application being within Core Hours, meeting the definition of a shop as set out in Clause C, and, the applicant demonstrating that they will not add to cumulative impact?

Answer Choices		Response Percent	Response Total
1	Yes	18.8%	3
2	No	43.8%	7
3	No response/Skipped	37.5%	6

Subject to the qualifications above.
"For the reasons above, there should be a presumption against as in the London Borough of Camden. A presumption in favour encourages applications.
Also the Council should not have removed Stress Areas.
You refer to a definition of 'a shop' but this appears to cover everything. Would it include brothels? Are they retail as they provide services? We therefore assume they are included, and why not as this new policy will turn Westminster into one mega bar!?
"For the purposes of this policy a shop will include premises where the primary activity is to provide the retail sale of goods or to provide services to customers upon payment."
We think that this is a very bad policy which could lead to a huge increase in bar type premises.
Case by case basis needed with comments from affected residents noted before granting anything.
We believe that within the CIZ there should be a rebuttable presumption to refuse the application, at least after 20:00, even for a shop. The proposed Policy is to generally grant if "The applicant has demonstrated that they will not add to cumulative impact within the Cumulative Impact Zone.". We fail to see the difference between this and a policy to generally refuse unless "The applicant has demonstrated that they will not add to cumulative impact within the Cumulative Impact Zone." Our preference is for a construction that makes clear that the onus is on the applicant to rebut the presumption.
"1. Clause B: We do not agree with the statement, 'applications for shops inside the West End CIZ will generally be granted'. Shops selling alcohol without food can be classified as bars, therefore for on sales there should be a presumption to refuse, however applications which seek to provide on sales until 8pm will be considered subject to other relevant policies.

17. Is the definition of a shop in Clause C sufficiently detailed to identify which premises will be considered under this policy?

Answer Choices		Response Percent	Response Total
1	Yes	50%	8
2	No	12.5%	2
3	No response/Skipped	37.5%	6

I believe so?
The definition appears to be sensible.
See above. Does this include 'sexual services'? We are not saying they should be precluded of course.
Don't know.

Yes. However the time at which the premises are open should still be considered. A hairdresser which serves alcohol to customers between 09:00-18:00 should not be permitted to sell alcohol to people who are not customers of its service until. The sale of alcohol must be ancillary to the activities taking place at the time the sale is made.
The proposed common examples covers every type of shop. We assume any shop that applies for a licence will therefore be considered.
Yes, although care should be taken to scrutinise the effect of an application to, say, core hours where a shop had previously closed at 8pm or 9pm i.e. that the premises operates as a shop throughout the hours and does not morph into something different after, say 8 or 9pm.
Yes, although care should be taken on individual applications that the premises operates as a shop throughout the hours and does not morph into something different after, say 8 or 9pm.

18. Is there anything that has not been included, or something that requires further clarification in Policy SHP1, such as the reasons for this policy, that you think should be?

"Clause X57 - would require recyclable packaging. Unless there is an active market for replate made from waste packaging, recyclability is irrelevant. Although a consequence of levying dissuasive taxes to minimise packaging especially that which will not be recycled might be fly tipping, the polluter pays principle should be invoked - charging much more for all packaging to enter Westminster. Clause X21 - it is not prudent for Westminster to assume that the sort of economy promoted prior to lockdown will or even should be restored - let alone pumped up (fast fashion and the like are causes of the collapsing climate). Tourism - especially that dependent of aviation - should not recover. "
See the qualifications above.
"There are no good reasons to go beyond the current 8pm restriction or the whole of Westminster becomes a form or large bar with the consequences set out clearly in the CI Assessment 2020 Report. These policies ignore the reality of life in the CIA's & appear aimed at assisting the WPA & others in maintaining the very high rent levels in the West End & elsewhere in Westminster."
Don't know
See points above
Areas to be included and proposed changes as stated above in Q. 14, 15, 16.
Clarification on whether the ancillary requirement for licensable activities in this policy will mean that premises will be exempt from the requirement to provide an acoustic report as required by Appendix 11, section 10 of the current Policy (being Use Class E).
Not apart from the points raised in Q14-17 above.

19. New Policy – Delivery Centre Policy DC1 Do you agree with the inclusion of a new policy for delivery centres providing the delivery of goods (either on their own or with other non-licensable products) as their main activity?

Answer Choices		Response Percent	Response Total
1	Yes	68.8%	11
2	No	6.25%	1
3	No response/Skipped	25%	4

Core hours only.
Delivery of goods on their own
Delivery centres for alcohol and food should not be allowed to operate outside normal working hours - say 8am to 7pm.
The proposal appears to be sensible.
We want the outcome monitored and the policy adjusted if this impacts unfairly on residents.
We support the inclusion of a Policy but not the choices made in its drafting. It is necessary for the Statement of Licensing Policy (SoLP) to adapt as new business models appear. We would also comment that, whilst popular, these delivery services are not economically viable. They are providing a service using investors funds, which will eventually run out. Applications of this type concern residents. Their business model requires them to locate themselves in residential areas. The introduction of Planning use Class E means that there is now limited Planning Scrutiny, and hence mitigation of potential impacts in the Planning process. We are pleased to see that there is a recognition of the potential impact at both the premises AND the destination for the delivery. However the Policy makes no attempt to address issues which arise during the journey between these. This is also the case for DEL1.
We agree that it is necessary for the Statement of Licensing Policy (SoLP) to adapt and respond to developments in licensing law and practice in a timely manner. There has been a number of applications recently for licences to enable delivery of alcohol (usually as part of a wider grocery order) via a 3rd party app. We expect the licensing authority to continue to receive applications of this nature.
That being the case, as with DEL1 it is right that the SoLP assists applicants and indeed potential objectors by setting out the potential risk factors associated with deliveries of alcohol/and food and setting policy parameters under which such applications can be specifically considered.
We are aware of applications which would fall under DC1 causing great concern for local residents. By the very nature of the business model (delivery of groceries/alcohol within a very short period of time) such premises will inevitably locate themselves in residential areas – and indeed this has been the experience of applications already submitted/determined. This is even more of an issue with the introduction of use class E under planning legislation, which makes it much less likely that a change of use application with the additional scrutiny of the planning authority would be necessary.
Therefore, from discussions we have had with amenity societies during the consultation period and from our own experiences of representing ‘other persons’ on applications which would in future fall under DC1, we do have some comments and reservations on specific aspects of the proposed policy.

We have set these out in the appropriate boxes below. In particular, we have been asked to reflect concern that in the West End CIZ, the sheer concentration of licensed premises may result in an additional cumulative impact on residents if the proposed policy approach is implemented without amendments to the proposed approach.

We are please that there is a recognition of the potential impact at both the premises AND the destination for the delivery.

Given the increase in the apps for such services, particularly where provided by 3rd party contractors, we agree that it is necessary to have specific provision in the Statement of Licensing Policy for this.

We already have experience of applications for licences which would fall within this policy.

Additional considerations, please see attached letter

20. Do you agree that the general policy approach in Clause A should be to grant applications outside the West End Cumulative Impact Zone subject to: the application meeting other policies within the Statement, the application being within Core Hours, meeting the definition of a delivery centre as set out in Clause C, if the premises are located within a Special Consideration Zone, the applicant taking account of the relevant Special Consideration Zone policy, and, the premises not being located in a predominantly residential area?

Answer Choices		Response Percent	Response Total
1	Yes	62.5%	10
2	No	0%	0
3	No response/Skipped	37.5	6

Core hours only.

The premises not being located in a predominantly residential area

Subject to the qualifications above.

Careful evaluation of impact on local people needs to be done

We support the inclusion of a Policy but not the choices made in its drafting. It is necessary for the Statement of Licensing Policy (SoLP) to adapt as new business models appear.

We would also comment that, whilst popular, these delivery services are not economically viable. They are providing a service using investors funds, which will eventually run out. Applications of this type concern residents. Their business model requires them to locate themselves in residential areas. The introduction of Planning use Class E means that there is now limited Planning Scrutiny, and hence mitigation of potential impacts in the Planning process.

We are pleased to see that there is a recognition of the potential impact at both the premises AND the destination for the delivery. However the Policy makes no attempt to address issues which arise during the journey between these. This is also the case for DEL1

Yes, but with caveats as follows:

1. Whilst we agree with the need for a policy and the general policy approach i.e. the inclusion of the criteria, the location of premises is perhaps even more important than usual, given the business model. We do however note the inclusion of A.4 re: 'predominantly residential area'.
2. We note that the SCZ policy is included, meaning that applicant in areas which were until recently in CIZs (i.e. Queensway/Bayswater, and Edgware Road) will have to demonstrate compliance with the SCZ Policy.
3. There should be a very careful examination on a case-by-case basis of whether it is appropriate to grant such applications. Whilst there are certainly areas where these premises could operate to 'core hours' whilst promoting the licensing objectives, there are also areas where they could not. It should be clear to applicants that the particular location of the premises and the level of resident concern will be key factors and that in such circumstances 'core hours' would not necessarily be granted, and that 'within' core hours does not mean 'to the full extent of' core hours.

We agree with the general approach, but would emphasise that whilst there are certainly areas where these premises could operate to 'core hours' whilst promoting the licensing objectives, there are also areas where they could not. It should be clear to applicants that the particular location of the premises and the level of resident concern will be key factors and that in such circumstances 'core hours' would not necessarily be granted, and that 'within' core hours does not mean 'to the full extent of' core hours.

Additional considerations, please see attached letter

21. Do you agree that the general policy approach, set out in Clause B, should be to grant applications within the Cumulative Impact Zone subject to: the application meeting other policies within the Statement, the application being within Core Hours, meeting the definition of a delivery centre as set out in Clause C, the applicant demonstrating that they will not add to cumulative impact, and the premises not being located in a predominantly residential area?

Answer Choices		Response Percent	Response Total
1	Yes	50%	8
2	No	12.5%	2
3	No response/Skipped	37.5%	6

The premises not being located in a predominantly residential area

Subject to the qualifications above.

There should be a presumption against or you are gradually whittling away the protections that were intended when WCC lobbied for CIA's in the 2003 Act.

Careful evaluation of impact on local people needs to be done
Our concern is with the presumption to grant. We think that it is more appropriate to have a rebuttable presumption to refuse. The proposed Policy is to generally grant if “The applicant has demonstrated that they will not add to cumulative impact within the Cumulative Impact Zone.”. We fail to see the difference between this and a policy to generally refuse unless “The applicant has demonstrated that they will not add to cumulative impact within the Cumulative Impact Zone.” Our preference is for a construction that makes clear that the onus is on the applicant to rebut the presumption. Other comments as in Q 21
We agree with all of the above apart from, ‘the premises not being located in a predominantly residential area?’. Please see our response to Q.12
With the following caveats:
1. Whilst we agree with the need for a policy and the general policy approach i.e. the inclusion of B1-5, we do have concerns as to the ‘generally grant’ provision. The location of premises is perhaps even more important than usual, given the business model. We do however note the inclusion of A.4 re: ‘predominantly residential area’ and trust that this will be a natural ‘check and balance’ (although see comments on the phrase ‘predominantly residential’).
2. There is though some concern, particularly in the West End CIZ, that the ‘generally grant subject to’ provision is not strict enough.
3. We do note that the West End CIZ is specifically mentioned in the DC1 policy and at B.3. an applicant must demonstrate that they will not add to cumulative impact. This is the same policy presumption as an application under the previous OS Policy.
The PWMVS area does not include any CIZ.
Additional considerations, please see attached letter

22. Is the definition of a delivery centre in Clause C sufficiently detailed to identify what premises will be considered under this policy?

Answer Choices		Response Percent	Response Total
1	Yes	56.3%	9
2	No	12.5%	2
3	No response/Skipped	31.3%	5

Delivery centre is sufficiently detailed to identify what premises will be considered under this policy
The definition seems sensible.
Can the council control the kind of premises being used as delivery centre? It seems unfair that a lockup within the courtyard of a mansion block might be used in this way.
The definition of a delivery centre suggests that the primary activity is the storage of alcohol and/or preparation of hot food. In fact many delivery centres are essentially micro food distribution centres whose primary function is storage of groceries, only a proportion which are licensable. This should be covered within the definition. The inclusion of "prepare hot food" means that the DC Policy covers "dark kitchens". There a number of ways these can harm the Licensing Objectives including fumes, smell, waste storage and collection, as well as a high level of delivery activity. All these need to be at least highlighted in text as well as referred to in the Policy.
We would however point out that the primary function of a delivery centre may not be storage of alcohol/preparation of LNR, and reference may need to be made to the grocery element, albeit this is not the licensable activity.
Please see attached letter

23. Do you have a view on the definition in Clause D of 'a predominately residential area'?

Where the area fully housed
All Westminster - other than where premises in streets have late night licences (e.g. Soho)
Seems sensible. Hereford Road is definitely a predominantly residential area.
I cannot find Clause D, however "predominately residential area" dos not take account of the fact that many parts of the CIA's are high density mixed use areas which was one reason for having CIA's in the first place.
In an area such as Fitzrovia and in and around Charlotte Street the area is mixed. Some streets are almost all residential but most have a mix of residential and commercial. We think that the clause should state "residential or mixed-use area".
Cannot find this definition. Same for Clause C.
See answer to Q12 above
See response to q.12.
See answer to Q12 above
"We are uncomfortable with this definition, as we feel there is a lack of clarity and will lead to arguments on the definition of 'predominantly' and 'area'.

24. Is there anything that has not been included, or something that needs further clarification in Policy DC1, such as the reasons for this policy, that you think should be included?

Whether this applies to restaurants that offer delivery service or whether that is only applied for DEL1
See the qualifications above.
""D. For the purposes of Clause B. 4. reference to 'a predominately residential area' means an area of the City in which housing is the predominant use.""
See above."
Don't know
other than the dark kitchen issue above, no

4. Section 3 - Amendments to Other Policies

25. Deletion of the Off Sales of Alcohol Policy OS1 Do you agree with the proposal to delete the Off Sales of Alcohol Policy OS1?

Answer Choices		Response Percent	Response Total
1	Yes	62.5%	10
2	No	0%	0
3	No response/Skipped	37.5%	6

This will make it easier to serve customers and send orders by time 5 am
Assuming this policy is now subsumed within the new policy.
Provided that the 'core hours' for off sales remains the same
The core hours for off sales should remain the same.
Provided that the 'core hours' for off sales remains the same.
Provided that the 'core hours' for off sales remains the same.

26. Do you have a view on the proposed amendment to remove the Core Hours for the deleted Off Sales of Alcohol Policy OS1?

Yes please it will help the shop keepers to extend time hopefully it will help due to covid
Reasons as above in the CIA's.
This is a large document for lay people to absorb. It would be useful to have a comparative table of current and proposed policy details side by side.
The 'core hours' for off sales should remain the same
The core hours for off sales should remain the same.
The 'core hours' for off sales should remain the same.
The 'core hours' for off sales should remain the same.

27. Do you have a view on the proposed new Core Hours for all licensable activities, except the off sales of alcohol in shops?

The new core hours for all licensing activities will help all shop keepers
See the qualifications above.
It should remain at 8pm especially in the CIA's with a presumption against extending in the CIA's.
Again - we need comparative visual showing current and proposed. If hours are longer, this will impinge on residents more than before.
Yes - see response to Q15 and Q16
See response to q15 and q.16
See response to q15 and q.16
We have reservations regarding core hours for on sales of alcohol and other licensable activities in shops. Although this may or may not be a different policy approach from currently, it may well lead to more shops opening later and more nuisance caused to residents if customers have been drinking/listening to loud music.
We would rather have an earlier time specified for what would 'generally' be granted for 'on' sales of alcohol and other licensable activities in shops, particularly where not ancillary to a table meal or substantial food. We appreciate that under the current policies, it is open to shops to say that they should be granted 'core hours' under whichever policy they could come within, however in our experience, such applications were in practice granted to a lesser terminal hour.
Very few if any shops in the PWMVS area are open past 9pm anyway, and so licences granted for later than this could be problematic in increasing footfall late in the evening and harm the licensing objectives.

28. Do you have a view on the Core Hours for the off-sale of alcohol in shops?

The core hours for the off sale of alcohol in shops will help shop keepers
No sales or deliveries allowed within Westminster after pub closing time.
See the qualifications above.
See above for shops.
See answer to Q27
they should remain the same as now
We do not approve of off sales for shops, see Q.16.
they should remain the same as now
They should remain the same as now.

29. Do you have a view on the proposed new Core Hours for Delivery Centres?

Question the delivery centre?
Normal working hours
See the qualifications above.
Depending on location, these will definitely impinge on residents. Shorter hours are better for residents.
'core hours' for off sales should remain the same
core hours' for off sales should remain the same as now.
Core hours' for off sales should remain the same.
Deliveries beyond core hours will negatively impact residential areas especially if combined with short-lets. For additional considerations please see attached letter.

30. Amendment to Fast Food Premises Policy FFP1 Do you have a view on the proposed amendment to the Fast Food Premises Policy FFP1, to include a new sub clause in Clause A and B, ensuring that the new Ancillary Delivery of Alcohol and/or Late-Night Refreshment Policy DEL 1 is considered along with other policies within this statement?

No fast food deliveries after pub closing time. Residents and visitors should plan in advance, and also have sufficient ready meals in case of exceptional occasions.

Seems sensible.

Agree that this new Ancillary delivery Policy must be considered along with other policies

31. Do you have a view on the proposed amendment to the Fast Food Premises Policy FFP1, to include a new sub clause in the definition of a Fast Food Premises within Clause D, clarifying that delivery services can be provided if they are ancillary to the main function of that premises?

See the qualifications above.

Agree that this new Ancillary delivery Policy must be considered along with other policies

Subject to 'core hours' remaining the same

Subject to 'core hours' remaining the same.

Subject to 'core hours' remaining the same.

32. Amendment to the Restaurant Policy RNT1 Do you have a view on the proposed amendment to the Restaurant Policy RNT1, to include a new sub clause in Clause A and B, ensuring that the new Ancillary Delivery of Alcohol and/or Late-Night Refreshment Policy DEL 1 is considered along with other policies within this statement?

See the qualifications above.

Agree that this new Ancillary delivery Policy must be considered along with other policies

Subject to the comments on hours for off sales.

please see answer to Q.10

Subject to our comments on hours for off sales
We agree, subject to our comments on hours for off sales.

33. Do you have a view on the proposal to amend sub-clause 3 of Clause D, of the restaurant definition, clarifying that takeaway food and drink for immediate consumption can be provided via an ancillary delivery service to customers at their home or workplace?

See the qualifications above.
Don't know.
"There is no need for clarification. A & B are clear that they can provide delivery services which comply with policy. This is not "takeaway... for immediate consumption""
We don't think the definition needs to be amended, as the takeaway food and drink would not be for 'immediate consumption' in any event, as it would need first to be delivered to the destination.
We don't think the definition needs to be amended, as the takeaway food and drink would not be for 'immediate consumption' in any event, as it would need first to be delivered to the destination.

34. Other Minor Amendments to the Other Premises Use Policies Do you have a view on the proposed insertion of a new sub-clause into the remaining premises use policies, so that the Ancillary Delivery of Alcohol and/or Late-Night Refreshment Policy DEL1 is considered if a premises intends to provide a delivery service to customers?

See the qualifications above.
Don't know.
I cannot find anywhere else to make the point that this consultation does not address the issue of shisha. Not a licensable activity, we continue to wonder why it is not?
We feel that shisha is capable of being addressed by the policy and should be, to protect residential amenity and safety.

Written Submissions

Respondent	Response
Marylebone Association	<p>THIS REPRESENTATION is made by the Marylebone Association, recognised by Westminster as the Amenity Society for the Marylebone Area south of Marylebone Road and so represents the interests of those who live and work in this area.</p> <p>We are pleased to see that Westminster have quickly recognised the need for these amendments to their SLP and generally welcome the proposed revisions. Our overriding concern lies with the possibility of nuisance being caused by operators to the health and wellbeing of residents.</p> <p>The importance of these revisions is enhanced due to changes in Use Class Order and the move towards an ill-defined concept of Town Centres where 'café culture' and al fresco dining are seen to be the magic wand to cure Covid problems but with scant regard for the amenity of existing and potential residents. It is therefore welcome that the tone of the revisions seems to be centred on the potential nuisance that may be caused by the new business practises. We would stress, however, that it is Policy HRS1 that is key and we would welcome confirmation that this is the fundamental basis of control.</p> <p>In the new policies DEL1 and DC1 there is a definition "For the purposes of Clause B. x. reference to 'a predominately residential area' means an area of the City in which housing is the predominant use."</p> <p>We find this definition problematic as there is nothing to suggest that it is to be evidence based and may just be a matter of 'judgment' by different Licensing sub-Committees ("LSC"). Therefore, we would welcome more detail as to how a 'predominately residential area' will be defined. Further as most of the West End is not predominately residential but mixed use, delivery centres should be zoned to predominantly business areas.</p> <p>Throughout the document Westminster have stressed the need for recognition of environmental objectives of both The London Plan and The City Plan. It is unclear how much weight will be applied by Licencing sub-Committees in their deliberations. We are happy that environmental concerns are to be taken into account but would prefer to see the requirements more clearly set out as to where they may be mandatory and where they are purely voluntary.</p> <p style="text-align: center;"><u>Comments on the draft</u></p> <p style="text-align: center;">DEL1 – Clause A & Clause B</p>

	<p>We are unclear why there needs to be two Clauses on DEL1. Clause B seems more like a detailed definition of Clause A except for Clause A.6 which we would have thought should be mandatory.</p> <p>X6 – X11 and X53 – X58 are restatements of environmental policy. We believe that it should be more clearly stated how these will be calibrated by LSCs against Licensing Objectives. At present they appear to be vague expressions of wish rather than a fundamental driver of LSC decisions.</p> <p>X19 and X65 clearly need to be mandatory conditions on a licence</p> <p>The interaction between X27, X31 and X35 is unclear as they are possibly contradictory with each other and with new HRS1. In particular ‘guidance’ in X27 should not overrule the non-grant implied in X31</p> <p>Policy DC1 is welcomed but with the strong caveat that the residential area definition is clarified. This is particularly important with reference to X52.</p> <p>X52 residents’ consultation should be mandatory not voluntary and should also include details of how the design of any street-facing frontage is to be in keeping with the neighbourhood. Shop fronts need to be attractive to entice custom whereas the front of a delivery hub has no such need. Although obviously not a Licensing matter we would welcome confirmation that an LSC would take into account the aesthetics of the premises so that a holistic approach to Town Centre development is undertaken.</p> <p>X27 – guidance is to match alcohol sales to normal shop hours which makes Core Hours defined in 10a and 10b contradictory. We agree that this definition of Core Hours is suitable and would like to see this acknowledged in X27. However, we see no reason anyway why core hours for shops in a Cumulative Impact Area should be allowed to sell alcohol beyond the time permitted to off-licences, and indeed see no adequate justification in the revisions document for extending the existing time limit of 8.00pm.</p> <p>Policy RNT1 is to be amended but what are the metrics that define ‘ancillary’ and if a delivery business grows bigger than the main operation how will this be monitored to understand if a new licence will be required?</p> <p>Marylebone Association 25/7/2021</p>
St John’s Wood Society	<p>St John’s Wood Society’s response to the proposed revisions to Westminster City Council’s Statement of Licensing Policy - Delivery of alcohol and/or late-night refreshment to customers at home or their workplace and the provision of licensable activities in shops. Section 5, Licensing Act 2003.</p>

	<p>The St John's Wood Society welcomes the proposed policy DC1, Delivery Centres. However, we make the following comments regarding DC1 section A based on our experience with existing Delivery Centres in St John's Wood:</p> <ul style="list-style-type: none"> • Applications for a delivery centre outside the West End Cumulative Impact Zone will generally be granted subject to: We request that this is amended to There will be a presumption to generally refuse applications for a delivery centres outside the West End Cumulative Impact Zone if: Reason: applicants should not assume that licences will be automatically granted • 4.The premises are not located in a predominantly residential area. We consider "predominantly" residential area to be a highly subjective phrase. The word predominantly is open to interpretation and is likely to be viewed in the broadest possible terms by applicants. We therefore request the following amendment: <i>There will be a presumption to generally refuse applications for a delivery centre outside the West End Cumulative Impact Zone if:</i> 4. The premises are located in a residential area. • We request that the following additional point is included in DC1 A. <i>There will be a presumption to generally refuse applications for a delivery centre outside the West End Cumulative Impact Zone if:</i> 5.The premises are located on High Streets within Conservation Areas. Reason: Harmful impact on the character and setting of the High Street and Conservation Area; harm to the enjoyment of visitors to the High Street; detrimental impact on other businesses on the High Street. <p>St John's Wood Society</p>
Metropolitan Police Service	<p>Response to the consultation for the proposed revisions to the SLP – June 2021</p> <p>Thank you for informing the Metropolitan Police Service of the consultation process Westminster City Council is currently undertaking in relation to the amendments to the Statement of Licensing Policy.</p> <p>Given the current significant societal changes and businesses continued efforts and adaptations in staying relevant/profitable. These new amendments will be a welcome addition in assisting and guiding applicants, responsible authorities and the licensing subcommittee through the application process.</p>

	<p>I have consulted a number of key stakeholders within Central West BCU. We are fully supportive of all of the revisions detailed within the consultation paper if properly implemented by applicants. The main areas of concern the police have around delivery of off sales and distribution centres I will detail below.</p> <p>Base Location – Whether this is a premises that would fall under policy DEL1 or DC1, the actual location is key as to how it integrates itself within its environment. As well as the obvious public nuisance issues around location being in residential areas. We have identified problems with premises being located within areas of poor road infrastructure for these types of operation. These include one way systems and mandatory directional junctions. This has created situations where delivery drivers have regularly committed road traffic offences which in turn brings in the C&D and Public Safety objectives.</p> <p>Employed or 3rd Party Drivers – As a basic opinion, there are far fewer problems with delivery drivers employed directly from an operator than utilising a 3rd party ordering/delivery system. These employed drivers are more involved in the business and the business has more control over their actions. Thus able to prevent or resolve problems.</p> <p>Underage Sales – Probably the greatest concern around off sale deliveries, is that of underage sales. Currently there are sufficient conditions that can be placed on licences to mitigate this risk. However, without direct intelligence reports of breaches, it is very difficult away from TP operations to monitor and enforce. I can envisage policy or processes around this area to develop over time.</p> <p>Many of the immediate concerns both police and any interested parties will have, can be sufficiently resolved through sufficient conditioning of the licence. This has been shown to be the case in other areas of the MPS and these conditions should be submitted as part WCC model conditions, so that applicants are aware of them on submission. There should also be an understanding that these could change over time, as these business practices embed themselves and associated risks are identified.</p> <p>If further explanation or comment is required, please do not hesitate to contact my team or me.</p> <p>Yours sincerely,</p> <p>Licensing Department Central West BCU</p>
Resident	I am a resident of St John's Wood, London NW8.

I understand that the Council is currently consulting on the implementation of proposed revisions to its Statement of Licensing Policy, in particular a proposed new policy dealing with the delivery of alcohol and late-night refreshment.

Delivery Centre Policy DC1

My consultation response relates to the new Delivery Centre Policy DC1, in particular that part of the policy which deals with applications for a delivery centre license outside the West End Cumulative Impact Zone. This is dealt with in Sub-clause A of the proposed policy DC1, the draft of which currently provides as follows:

“Delivery Centre Policy DC1

A. Applications for a delivery centre outside the West End Cumulative Impact Zone will generally be granted subject to:

- 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 applicant has taken account of the Special Consideration Zone Policy SCZ1 if the premises are located within a designated zone,**
- 4. The premises are not located in a predominantly residential area, and**
- 5. The application and operation of the venue meets the definition of a delivery centre in Clause C.”**

.....

The following definitions are provided in Sub-clauses C and D of Policy DC1:

C. For the purposes of this policy a delivery centre is a premises that’s primary function is to temporarily store alcohol and/or to prepare hot food and hot drink, so that it is available when ordered for transportation to a customer’s home, workplace or other residential or workplace location.

D. For the purposes of Clause B. 4. reference to ‘a predominately residential area’ means an area of the City in which housing is the predominant use.

My Comments on Policy DC1A

The new policy is generally very welcome, however I strongly feel that the Council should add wording to proposed Policy DC1A in order to introduce a presumption to refuse premises licence applications that are located in predominantly residential areas. This could be achieved by, for example, the new policy provision in DC1A specifying that “*applications for a delivery centre outside the West End Cumulative Impact Zone within premises that are located in a predominantly residential area will generally be refused*”. The reasons for incorporating such a presumption to refuse are set out within the following paragraphs

	<p>of the consultation document: paras 1.3, 1.5, 1.7, 2.6, 2.7 and X46 – X65 (setting out the reasons for the proposed policy change).</p> <p>I believe that this amendment to the draft policy DC1A should be made to ensure that those residents living in predominantly residential areas outside the West End Cumulative Impact Zone are not adversely impacted by the advent of delivery centre businesses which quite clearly cause very significant detrimental issues as outlined in the consultation document itself. The introduction of a presumption of refusal in the circumstances described above will protect these predominantly residential areas and the residents living within them from very significant harm.</p> <p>Thank you for taking into account my comments.</p>
Knightsbridge Association	<p>Thank you for inviting the Knightsbridge Association (“KA”) to comment on the proposed updates to the Westminster City Council (“WCC”) Licensing Policy.</p> <p>Our priority as a Residents Association is to reflect the views of our members and residents, including local businesses, many of whom are extremely concerned about the development of the night-time economy and its encroachment on their rights to a quiet enjoyment of their homes and surrounding environment.</p> <p>We note that WCC proposes to introduce three new policies, being Ancillary Delivery of Alcohol and/or Late-Night Refreshment Policy (DEL1); Shops Policy (SHP1);and Delivery Centre Policy (DC1). We have reviewed the Final Consultation Document published on 14 June 2021 and write to make the following comments:-</p> <p>A. Ancillary Delivery of Alcohol and/or Late-Night Refreshment Policy (DEL1)</p> <ol style="list-style-type: none"> 1. The proposed relaxation could result in a ‘free for all’ with substantial increases in the volume of deliveries being made and therefore the noise and disturbance outside restaurants and bars and private homes. This additional noise and disturbance would be at ‘both ends’, namely at the point of collection from the restaurant / bar but also at the point of delivery to the consumer. 2. Delivery vehicle engines should not be left running while the couriers enter the premises to pick up food and drink for home delivery, nor when they drop them off. 3. Individuals and businesses that provide courier delivery services should be formally accredited by WCC. This would require WCC to ensure (a) that couriers are registered as “accredited carriers” with WCC and (b) that they are compliant with WCC policies, including vehicle safety, appropriate tax and business insurance and compliance with latest emissions’ standards <p>B. Shops Policy (SHP1)</p>

	<p>The KA supports a more comprehensive policy that replaces the existing OS1 provided all licensable activities carried on by the premises are subject to the new policy.</p> <p>C. Delivery Centre Policy (DC1)</p> <p>Please confirm the definition of a 'predominantly residential area'. A map showing those streets that fall into this category would be helpful. This might allay concerns of many Knightsbridge residents, whose streets often form the boundary between what is generally accepted as 'predominantly commercial' and 'predominantly residential' areas.</p> <p>The KA is concerned about proposed Amendments to Core Hours Policy (HRS1) to reflect new premises uses. Page 62 of the January 2021 WCC Statement of Licensing Policy sets out the core hours in policy HRS1.</p> <p>For Restaurants, these are 09 00 to 23.30 (Mondays to Thursdays), 09.00 to 24.00 (Fridays & Saturdays, plus Sundays before a Bank Holiday) and 09.00 to 22.30 (Sundays).</p> <p>However, we must point out that the above terminal hours contravene those set out in policy KBR 15 of the Knightsbridge Neighbourhood Plan to which WCC is a signatory.</p> <p>As far as we can tell from a review of consultation documents, there appears to be no intention to extend core hours. Any attempt to do so would be strenuously resisted, as it would have a strong negative impact on the quality of life for local residents.</p> <p>We are concerned by the increasing use of TENS (Temporary Event Notices), to which only the Police may lodge objections. TENS permit any restaurant or bar premises to 'opt out' of the above core hours constraints up to 28 times per year. Taken in conjunction with the proposed policy changes this is likely to give rise to a substantial increase in noise and anti-social behaviour.</p> <p>Please take these factors into account when finalising the revised policies.</p> <p>Licensing Committee Knightsbridge Association</p>
Portland Village Association (Additional Response)	<p>Dear Sir, Madam,</p> <p>Proposed revision to WCC Statement of Licensing Policy – deliveries and shops</p>

We are writing further to your request for comment regarding possible changes to Westminster's licensing policy. While our response focuses mainly on the potential issues concerning alcohol delivery services, we also express general concerns about the overall impact of 'fast' delivery services on our neighbourhood's amenity. We recently commented in this regard on an application for 24/7 alcohol delivery from Great Portland Street ([21/01011/LIPN](#)) (please see attachment [B] and [C]) and submit the following points for consideration:

- Deliveries of alcohol should be made to bona fide residential or office locations
 - Deliveries to an '*other specified location*' in unclear (see DC1.C) public areas, such as parks, communal areas, building receptions or on a property's threshold should be avoided. Rough sleepers should not be able to avail themselves of these services.
- The ID Check, record and authentication process should be more robust
 - Purchasers should upload ID details online as part of the ordering process and then present ID again when the delivery is made. Delivery documentation should include a time stamp and photo of delivery location. This proof of fulfilment is already customary for the delivery of most items (see Amazon delivery policy as an example).
- Delivery of alcohol outside of core hours
 - Out of core hours, alcohol delivery may worsen disruptions already seen with short-term lets. Local residents feel strongly that this should not be permitted.
- Advertising for delivery and/or consumption of alcohol
 - Operators of such services should not market their alcohol delivery services to public areas such as parks or communal areas. For example, no advertising (online and offline) should suggest that alcohol delivery to public areas is possible. Shopfronts should not be used to promote the consumption of alcohol, especially in the areas of schools.
- Operational management plans (OMP) to mitigate negative impact on amenity
 - The operator's (third party) delivery service should be vetted to ensure compliance with licensing and Highway Code. The issues include riding bikes on pavements, the wrong way down streets and without duty of care. Operators, not just the riders, should be held accountable. Direct control of and responsibility for delivery agents is the preferred solution.
 - Applications should also be assessed regarding their possible negative impact on amenity with the parking of vehicles on footpaths or dominating street parking bays with fleets of vehicles to exclusion of other users (see image sections A1, A2 and A3). Vehicles/riders should be identifiable and the operator held jointly responsible for infractions.
 - Waiting delivery agents should be hosted within the operator's facility. We agree that seating or loitering of drivers or riders should not be permitted outside the facility or adjacent residential areas. Large congregations and seating for delivery personnel (couches and deck chairs) should be not permitted in the public realm (see

image section A2). An OMP should specify how many riders are expected outside a facility and where they will gather or mobilise.

- Visual blight on high streets and public footpaths
 - WCC should assess whether the frontages of shops converted into warehouse/ fulfilment centres will blight a neighbourhood's high street. They should ensure the operator maintains a shop frontage that matches the historic look and feel of the street (please images A1).
 - Adequate on-site refuse storage space must be created to avoid waste being put out incorrectly on the street (see image A2). Deliveries should be consolidated off-site in order to avoid lengthy periods of congestion and disruption outside the proposed fulfilment centres (please image A4).
- Problem addresses and suspension of service
 - Operators should not (continue to) deliver alcohol to problem addresses once notified by WCC and/or the police.

We are grateful for this opportunity to be heard, especially as we feel that the controls on the (powered) bike delivery sector needs greater regulation. The size and reach of such operators has grown dramatically. The risk and inconvenience they present to other road and pavement users have similarly increased. A measurable code of (best) practise for the sector would be beneficial as it could inform future licensing and planning assessments.

In anticipation of ever-greater numbers of pedestrians in the West End with the roll-out of the Oxford Street District and the opening of Crossrail projects, it is essential that public footpaths feel safe and available for pedestrians (see image sections A2 and A3).

Yours sincerely,

Enc:

Copy PVA submission *Consultation on the Proposed Revision to the Council's Statement of Licensing Policy – deliveries of alcohol and/or late-night refreshment to customers at home or their workplace and the provision of licensable activities in shops.*

[A] Photos

[B] Copy Submission to Licensing Sub-Committee for application 21/01011/LIPN

[C] Copy Submission to the Licensing consultation for application 21/01011/LIPN

A1 Photos

A1. Parking bay use / storage of delivery bikes / waste management



Foley Street



Bolsover Street

A2. Loitering of riders and bikes, on street rider seating



Baker St (Chipotle and Joe the Juice)



Great Portland Street
A.3 Delivery bike parking (pavement use competition) and waste



Great Portland Street



Great Portland Street



Weymouth St



Great Portland Street

A4. Out of hour deliveries, servicing nuisance in residential areas



Weymouth Street

BJ Copy Submission to Licensing Sub-Committee for application 21/01011/LIPN

From

Re: Zapp, 167-169 Great Portland Street, London, W1W 5PA

Application for new premises licence, ref: 21/01011/LIPN

Submission on behalf of interested parties

	<p>1.1 Between the hours of 16.30 and 09.30, sale of alcohol would be for delivery only.¹ Between 18.00 and 08.00, delivery conveyances would be pedal bike or electric bike/vehicle only. A number of other conditions are proposed, a number of which the interested parties consider to be helpful.</p> <p>1.2 The interested parties do not object to a premises licence being granted, and have discussed further measures which they would ask Members to impose should they be minded to grant the application. The interested parties do however retain reservations about the hours sought in the application and, having considered the matter carefully and 'in the round', do oppose 24/7 sale of alcohol.</p> <p>1.3 The concerns raised in the representations can be summarised as follows:</p> <ul style="list-style-type: none"> 1.3.1 Noise/nuisance arising from inbound deliveries to the premises. This has largely been alleviated by a proposed condition² and further information received from the applicant. 1.3.2 Noise nuisance arising from and as a result of fulfilling outbound deliveries. This has partially been alleviated by proposed conditions and further information received from the applicant. However, concerns remain as to noise/nuisance after 'core hours'. 1.3.3 Other nuisance potentially arising from delivery drivers e.g. gathering outside/smoking/general behaviour on and off delivery vehicles. This has been partly alleviated by proposed conditions and further information received from the applicant. In particular, it is accepted that the existence of an internal waiting area inside the premises will assist with this, as will the provision that riders will be directly employed by the applicant. 1.3.4 Visibility of alcohol provision at the premises. This has been alleviated by a proposed condition. 1.3.5 Nuisance caused to residents at the point of delivery – see e.g. representation at p.12-13 of the LSC Report. <p>1.4 It is understood that Zapp, on the contrary, directly employ their drivers. The interested parties accept that this affords the applicant a higher amount of leverage over and control of delivery drivers than would typically be the case.</p> <p>1.5 However, they do feel that sale and delivery of alcohol throughout the night brings with it risk factors which sale and delivery of groceries not including alcohol does not.</p> <p>1.6 Risk of purchasing premises with licence ... The application had been for 24/7 sale/delivery of alcohol. It is also noteworthy that there was already a licensed 'footprint' at that address, which there is not here.</p>
--	---

¹ We believe that the applicant has proposed a condition that 'The sale of alcohol from the premises shall be: for delivery only by a delivery rider; for click and collect by customers between the hours of 0930 and 1630', although this does not appear in the LSC Report.

² The numbering of conditions in the LSC Report appears to have gone awry so we shall identify the relevant conditions at the hearing.

1.7 On behalf of the interested parties, we propose the following additional condition:

- The premises shall be operated in accordance with an Operational Management Plan prepared by the premises licence holder. The Operational Management Plan shall include details of how the premises licence holder will maintain appropriate controls over the conduct of delivery personnel and storage of delivery vehicles.

2 Statement of Licensing Policy 2021 (“the Policy”)

2.1 The application falls to be considered under a number of different, albeit interlinked, policies, primarily: HRS1; PN1; and OS1.

2.2 Policy PN1 is a key consideration. This policy states that provides criteria as follows:

‘The potential for nuisance associated with the style, characteristics and activities of the business to be carried on at the premises and the potential steps which could be taken to reduce the risk of nuisance occurring. This will particularly apply in areas of residential accommodation and where there is residential accommodation in the proximity of the premises.

Considerations

1. Noise and vibration

Whether Operating Schedules contain adequate measures to prevent noise and vibration, whether air borne or structure borne, generated from within the premises, outside it, or from an open site, that may cause disturbance to people in the vicinity. Regard will be had to disturbance of people whether at home, at work, staying in, or visiting the vicinity. However, stricter conditions will be imposed on premises licences in areas that have denser residential accommodation or have residential accommodation.’

2.3 A number of the factors enumerated in Policy PN1 are relevant to the concerns, particularly: the following considerations:

- *Minimising and controlling noise from staff, contractors and suppliers and their activities.*
- *Minimising and controlling noise from vehicles associated with and providing services to the premises or open-air site and their customers (including delivery companies).*

[C] Copy Submission to the Licensing consultation for application 21-01011-LIPN

Sent: Friday, March 5, 2021 2:04 PM

To: 'licensing@westminster.gov.uk' <licensing@westminster.gov.uk>; 'licence-reps@westminster.gov.uk' <licence-reps@westminster.gov.uk>

Subject: 167-169 Great Portland Street London W1W 5PA 21-01011-LIPN

Importance: High

Dear Sir, Madam,

We write in reference to the following application:

[167-169 Great Portland Street London W1W 5PA 21-01011-LIPN](#)

I would be grateful for your confirmation of receipt.

Yours sincerely,

Portland Village Association

=====

167-169 Great Portland Street London W1W 5PA 21-01011-LIPN

The Portland Village Association represents residents and businesses located around this site. We strongly object to this application for a 24/7 alcohol delivery centre at this location.

Our objections regard the risk of:

- public nuisance
- crime and disorder
- public safety
- protection of children

Public nuisance

'The potential for nuisance associated with the style, characteristics and activities of the business to be carried on at the premises and the potential steps which could be taken to reduce the risk of nuisance occurring. This will particularly apply in areas of residential accommodation and where there is residential accommodation in the proximity of the premises.'

'Whether Operating Schedules contain adequate measures to prevent noise and vibration, whether air borne or structure borne, generated from within the premises, outside it, or from an open site, that may cause disturbance to people in the vicinity. Regard will be had to disturbance of people whether at home, at work, staying in, or visiting the vicinity. However, stricter conditions will be imposed on premises licences in areas that have denser residential accommodation or have residential accommodation.'

'Minimising and controlling noise from vehicles associated with and providing services to the premises or open-air site and their customers (including delivery companies).'

It is likely that this operation will require many deliveries made at all hours – once operating to scale, there is a risk of nuisance to the neighbourhood residents, pedestrians and road traffic. The waiting riders/drivers may impede traffic between the two pedestrian crossings and bikes block the path of passing pedestrians. Their delivery trucks may also block traffic on Great Portland Street during peak periods.

The high number of delivery vehicles may impede customers of the motorcycle equipment shop next door using by using the motorcycle bay in front of the shops. There is a risk of impeding access to the pharmacy and post office next door, and blocking pedestrians travelling the hospitals and medical facilities on the street.

Delivery vehicles should not dominate available parking options in the neighbourhood (see Foley Street and Bolsover Street images attached). Groups of delivery riders (serving Starbucks) have gathered on the corners of Great Portland Street and respectively Devonshire and Weymouth Street. On occasion, riders chained deck chairs to street furniture to establish 'standby' positions (on Weymouth Street).

Deliveries to the facility should be made at times when they will not disturb locals (especially at night). Noise travels far, especially at night, affecting residents living on Great Portland Street, Devonshire and Weymouth Streets. The operation should also not impair the activities of local businesses nearby.

In order to minimise noise nuisance delivery should ONLY be by electrical vehicle/bike or pushbikes.

Public safety

Local businesses and residents acted with WCC to have this section of pavement widened and tree lined. We would like to ensure that this amenity remains unblighted. The operator should demonstrate how it will eliminate the risks of their riders' non-compliance with the Highway Code and public safety conventions.

Delivery riders are currently a threat to public safety here, as they are already ignoring the rules of the road (riding [at speed] on the pavement, not stopping for pedestrian crossings, riding the wrong way down the street etc.) The operator should demonstrate detailed procedures regarding: 1) how many riders will gather/wait, 2) where this will happen, 3) how/when/where their equipment will be secured, 4) how they will ensure that riders respect Highway Code standards (especially with regard to use of pavements, crossings and yielding to pedestrians).

Crime and disorder

We are concerned at the possibility that the supply of alcohol at night will result in crime and/or disorder in the neighbourhood. We have rough sleepers and begging on the street and this site may become another focus for their

activities. The late night supply of alcohol also risks attracting criminal activity. The Sainsbury's supermarket across the road has suffered incidents regarding its supply of alcohol and needed additional protection especially at night.

Protection of children from harm

There are numerous schools and colleges on Great Portland Street, Portland Place and Cleveland Street. Many come to Great Portland Street to purchase lunch and snacks after school or college. ID age checks must be made. No advertisement or signage promoting the use alcohol should be visible from the site or on the delivery bags/bikes.

We would also appreciate further information regarding the following:

1. Will this be an online warehouse, fulfilment centre and/or logistics hub?
2. Will any changes be made to its shop frontage and/or its main points of access?
3. How many transactions, delivery movements per day/night should be expected at full operation?
4. Will delivery riders/drivers be managed directly by the operator? Or by a third party? If by third party, how will rider/driver compliance be maintained?
5. How many riders will be allowed outside the operation at one time? How will gathering points be managed and what procedure established (holding spots, patterns, bike/vehicle storage)
6. How/when will large collections/deliveries be made to site?

Attachments:

- A. Foley Street (Dominoes Scooter domination of on-street parking bays)**



B. Bolsover Street (Supper scooters and rubbish dumping issue)



[← Back to all reports](#)

Bins and delivery bikes on yellow lines Bolsover St

Reported in the Illegal parking category anonymously
at 18:33, Sun 26 April 2020

Sent to Westminster City Council 3 minutes later



Bins and bikes permanently parked or stored inappropriately. Rubbish bags dumped on Pavement. Wheely bins not put away...

Report abuse 

Get updates 

Problems nearby 