

Dear Licensing,

Spitalfields Community Group (SCG) wishes to OBJECT to the application for a premises licence submitted by Old Spitalfields Market (OSM). The application is for the supply of alcohol 1100 - 2100 and provision of regulated entertainment 0900 - 2100, Monday - Sunday, in the open space of the market.

SCG was set up in 2011 to foster a sense of community in our mixed use residential area, recognising that residents face significant pressures from the proliferation of licensed premises. To that end, SCG campaigned for the adoption and effective implementation of a Saturation Policy by LBTH. Indeed, OSM is within the Cumulative Impact Zone, and as such should be refused.

Residents continue to face noise nuisance and disturbance from antisocial behaviour triggered by alcohol consumption, and the unwelcome phenomena of street urination and vomiting by patrons leaving licensed premises and loitering in residential streets. Old Spitalfields Market is surrounded by residential blocks of flats and terraced streets, meaning patrons leaving walk past family homes on their way to transport hubs on Bishopsgate and Commercial Street. There are numerous licensed premises in the area with hours later than those applied for, meaning patrons are likely to continue drinking and exacerbate levels of ASB caused by excessive alcohol consumption in our community. We are frequently prevented from enjoying leisure time in our homes and rarely benefit from an uninterrupted night's sleep. Crowds often gather and behave in an intimidatingly aggressive fashion. Members have recently reported an upturn in aggressive alcohol-fuelled behaviour such as damage to buildings and cars.

Historically SCG attempted to address problems caused by the "night time economy". It is noticeable, however, that the economy based on alcohol sales has morphed into a 24 hour economy. Increasingly, visitors to the area drink throughout the day, particularly at weekends. Aside from the obvious damage to public health, this has a negative impact on our residential environment.

The applicants claim to be effecting a significant reduction in the overall licensed area. There is an element of disingenuousness to this claim : their stated, and promoted, strategy has for several years been the replacement of licensed premises with high end retail outlets. So, the discontinuation of the licences at Smiths, 109 Commercial Street and Square Pie, 105 Commercial Street is irrelevant.

The overall licensed area applied for is substantial, and significant in its nature. It is a large open space with residential flats above business premises on the ground floor. The building is a large, porous echo chamber, reflecting its function as a covered market. Large gateways providing historic market access are situated on Commercial Street, Brushfield Street and Lamb Street, where large numbers of residents live. Noise currently spills out of the market during special events, creating noise nuisance as far away as inside homes in adjacent streets. The market enjoys good, effective security carried out by professional employees, but they have no jurisdiction over patrons when they leave the space and cause a disturbance in surrounding residential areas. An ongoing challenge for residents is to

identify which of the many licensed premises problem drinkers have just left. There is no accountability on the part of the premises - once a drinker has left they are no longer their concern. The problem lies - often literally - at the door of residents to deal with.

There are also ongoing questions relating to the logistics of a significantly extended operation, involving the increased alcohol consumption between 1900 and 2100 daily. Unloading and delivery of goods and the removal of empties are already a cause of noise nuisance and irritation to residents.

Lavatory provision is inadequate within the market. Individual outlets have their own facilities, but the public lavatories within the market are of poor quality. This risks aggravating the possibility of street urination and so needs to be urgently addressed.

The total of 91 days of Special Events, involving a doubling of the licensed area permitted, is excessive. This averages one Special Event every 4 days: an intolerable level of frequency.

The applicants also claim to be applying for the same licensed hours as previously permitted, albeit with a shift. It is the shift in timing which gives us greatest concern. 1900 to 2100 are prime drinking hours, when people drink a greater volume of alcohol and at a greater speed than before 1900. There is also a legitimate worry on the part of residents about what time patrons will be effectively cleared from the area.

The application contains the offer of standard conditions and special conditions. Experience has taught residents to have little faith in these being enforced by LBTH, and as such, they provide no reassurance.

In summary, SCG wishes to OBJECT to the licensing application submitted by OSM on the following grounds:

It is within the CIZ

It fails to demonstrate how it will prevent public nuisance such as ASB and noise nuisance caused by all day drinking and excessive drinking between 1900 and 2100

It represents a risk to children because of the open, ill defined nature of the space

It represents a risk of increased crime and disorder as patrons leave and behave unlawfully