

# **Westminster City Council**

## **Review of Statement of Licensing Policy – March 2015**

### **Part 1. Consultation on Review Proposals**

### **Part 2. 1<sup>st</sup> Stage Consultation on Cumulative Impact Areas**

Under the Licensing Act 2003, the City Council regulates the retail sale of alcohol, the supply of alcohol at club premises, the provision of regulated entertainment, and the sale of hot food and hot drink between 23.00 and 05.00.

At least every 5 years, the council must determine and keep under review its policy with respect to the exercise of its licensing functions, and publish a statement of that policy.

The council has a duty to promote the four licensing objectives, which are;

- Prevention of crime and disorder
- Public safety
- Prevention of public nuisance, and
- Protection of children from harm

The current Statement of Licensing Policy has operated since 7th January 2011. The current policy sets out the approach the council will take when applications for new licences are received, when variations are sought to existing licences, (for instance to extend the hours of licensable activity, change the conditions on the licence, or add other licensable activities), and determine applications to review licences. The aim of the policy is to promote the licensing objectives.

The policy recognises that the scale, diversity and concentration of licensed premises, particularly in the West End, is unique and brings cultural and financial benefits to the whole city. The council believes that good management of its vibrant entertainment industry, and of the street environment within which it operates, is essential to the continued success of central London, and in attracting a wide range of people who want to work, visit or live there.

The policy seeks to widen the choice and appeal of licensed premises, the development of greater diversity in the types of entertainment and cultural activity on offer and in the age groups attracted to them, and to protect the quality of life of local residents and visitors.

There are four general policies which relate to each of the four licensing objectives, and a policy which sets out the “core hours” to which the council will generally grant a licence.

Additionally, the Statement identifies three “stress areas” within the city which have been identified as suffering from the cumulative impact of a concentration of licensed premises, and where special policies apply; capping the number of bars, night clubs and take-away hot food premises and preventing them opening later or increasing their capacities. The council recognises the differing impacts that different types of licensed premises can have in relation to the licensing objectives and has policies for various types of premises, both inside and outside the designated “stress areas”.

The council has considered the operation of the current policy, drawing on issues raised at hearings of the Licensing Sub Committee, and which often reflect applicants’ or objectors concerns over the policy, and issues raised in the courts at appeal.

Part 1 of this review indicates areas where it is proposed that policy should be revised and includes associated questions seeking views on the issues and proposed revisions. The policy will also be revised to reflect changes in legislation, statutory guidance and council policies and initiatives which have been introduced since the last review and relevant data will be updated. Statutory guidance states that the cumulative impact of licensed premises is a proper matter for licensing authorities to consider when developing statements of licensing policy. Adopting the terminology in Guidance the council proposes to re-label “stress areas” as Cumulative Impact Areas and the special policies which apply in those areas as Cumulative Impact Policies.

If there are other issues and revisions that you would like to suggest they will also be considered before the policy is revised and adopted.

A set of questions based on the issues and the revisions that the council is considering are posed after each issue and are reproduced together at the end of the document with details for responding.

In Part 2 of this review the council is inviting submissions in relation to the current stress area boundaries and other areas of the city which may be considered to be suffering from cumulative impact. It is also proposed to consider if there are areas of the city where alternative measures, such as fixed closing times, staggered closing times and zoning in order to orchestrate closing times so as to manage problems in the night-time economy, are appropriate.

Consultation responses should be e-mailed to [licensingconsultation@westminster.gov.uk](mailto:licensingconsultation@westminster.gov.uk) or posted to Chris Wroe, Licensing Policy & Strategy Manager, Westminster City Council, 11<sup>th</sup> Floor City Hall, 64 Victoria Street, London SW1E 6QP.

**The closing date for the consultation is 15<sup>th</sup> May 2015.**

If you have any questions or comments on this consultation please contact Chris Wroe at [cwroe@westminster.gov.uk](mailto:cwroe@westminster.gov.uk) or go to the council website at [www.westminster.gov.uk](http://www.westminster.gov.uk).

## **Part 1 Consultation on Review Proposals**

### **1. Stress area policies in relation to alcohol sales ancillary to other uses at a premises**

- 1.1. The special policies which create a presumption to refuse applications for pubs and bars in the Stress Areas (other than applications to vary hours within the core hours) is a key principle of the Statement of Licensing Policy as a means of limiting the stress created by the cumulative impact of the number of premises and people in the Stress Areas. These policies apply to premises which, by definition, are used exclusively or primarily for the supply of alcohol for consumption on the premises. These pubs and bars may seek to operate throughout the day, into the evening or through the night.
- 1.2. The policy is clear that these special policies do not apply to restaurants which meet strict criteria defined in the policy. For the purposes of the policy a restaurant is defined as premises (i) in which customers are shown to their table, (ii) which provide food in the form of substantial table meals that are prepared on the premises and are served and consumed at the table using non-disposable crockery, (iii) which do not provide any take away service of food or drink for immediate consumption, and (iv) where alcohol can only be sold, supplied and consumed on the premises by people taking bona fida substantial table meals there, and provided always that the consumption of alcohol by such persons is ancillary to taking such meals.
- 1.3. Increasingly however the council receives applications for a range of premises wishing to sell alcohol which are neither pubs and bars, or restaurants, as defined in the policy. These premises may be cafes, with a significant food offer but without a requirement that alcohol is ancillary to food, delicatessens, with an existing retail and off licence provision, or premises with other retail or service uses which may not involve the provision of food at all. In some cases the proposal will be for a small bar area within the premises but operated separately from other activities within it. In other cases the sale of alcohol will be throughout the premises and integral to other activities.

- 1.4. Special policy STR1(ii) states that these premises are subject to other policies, and must demonstrate that they will not add to cumulative impact in the stress area. Hours policy HRS1(ii) states that applications for hours within the “core hours” set out in the policy will generally be granted, subject to not being contrary to other policies in the Statement of Licensing Policy.
- 1.5. Where premises are proposing the sale of alcohol for consumption on the premises there is always a potential that this will lead to an increased number of people consuming alcohol and for a longer period and which will add to existing stress.
- 1.6. The council however recognises that this will not always be the case. The availability of alcohol at lunchtime or in the early evening in premises where alcohol is ancillary to other uses of the premises and not associated with sustained or high alcohol consumption to later hours may not be likely to add to cumulative impact in the stress area.
- 1.7. It is proposed that the Revised Statement of Licensing Policy recognises that where applications for licenses to sell alcohol for consumption on the premises are made and (i) are appropriately conditioned so that the consumption of alcohol is not, and cannot become, a significant part of the operation of the premises and is regulated to promote responsible drinking; (ii) where the character of the premises is such that its customers are not likely to be involved in sustained or heavy drinking at later hours; and (iii) when the sale of alcohol is not permitted beyond 20.00 hours; then the council considers that permitting the sale of alcohol for consumption on the premises is unlikely to add to cumulative impact in the stress area.
- 1.8. Examples of appropriate conditions to ensure that alcohol consumption is appropriately regulated will include conditions that (i) only permit the sale of alcohol ancillary to the provision of food, or ancillary to other activities at the premises, or to the operation of the premises as a whole, (ii) require service of alcohol to be only by waiter or waitress to seated persons, and without the provision of a physical bar or facility for self service, (iii) require the licensed area to remain under the management of the premises licence holder with the licence being limited to their personal use (iv) require the consumption of alcohol to be restricted to an area which is an integral part of the premises with access to that area only through the premises and with no direct access to the street.

**Q1 Do you agree that the stress area policy relating to premises which sell alcohol but are not bars, pubs or restaurants should be clarified?**

**Q2 What conditions should be attached to such licences so as to ensure that they do not add to cumulative impact in the stress area?**

**Q3 Do you agree that if the sale of alcohol is limited to 20.00 hours then the premises are unlikely to add to cumulative impact in the stress area?**

**2. Stress area policy in relation to proprietary clubs or premises used for private functions**

- 2.1. Proprietary clubs, which are privately owned clubs run for profit, and premises used for private functions, restrict access to their premises by requiring customers to become members or be invited to an event. They may also allow guests of members, guests of the management of the premises, or staff, but access is denied to the general public.
- 2.2. These premises usually include bars, musical entertainment, dancing, and late night refreshment and are often seeking late hours in excess of “core hours”. Under the stress area policy there is a presumption to refuse such applications. The current Statement of Licensing Policy does not specifically identify and consider these types of premises, but applicants commonly submit that the entry restrictions proposed at the premises should allow the applications to be considered as an exception to the stress area policies and be granted because they will not add to cumulative impact in the stress area.
- 2.3. The reasons for these submissions typically include the assertion that there is a greater control over the customers using the premises, and because of the membership or private invitation requirements, it is suggested that customers on the premises are known or can be identified by the management, and this information shared with the police and licensing authority. Applicants may also offer to give advance notice of events at the premises and give police a power of veto over individual events.
- 2.4. The current policy recognises that well managed members clubs, which meet the qualifying criteria in the Act to operate under the authority of a club premises certificate, have little association with crime and disorder and public nuisance, because of their membership controls and the strict criteria which the premises must meet. In particular these “qualifying clubs” are often characterised by long standing membership which is valued by the member and gives a real incentive for the club to promote the licensing objectives in its neighbourhood. New members are often nominated and vetted by existing members and in all cases there is a delay of at least 2 days between the grant of membership and the use of the club by the new member. Membership is usually intended to be long term and often renewable annually, with a significant financial commitment on joining.

- 2.5. In contrast, proprietary clubs may allow members to join on-line with little or no prior contact with the member. Joining fees may be nominal and membership short term. Access to the club may be extended to guests of the management or other categories of person to allow immediate access. Individuals attending premises operating private functions, which could include corporate or personal events, are not necessarily known to the management of the premises, although will be known to the event organiser. Access may also be permitted to guests of invitees or guests of the management. Moreover, persons leaving proprietary clubs and premises operating private functions will sometimes cause public nuisance or be involved in crime, either as perpetrators or victims.
- 2.6. The council is therefore of the view that there is a clear distinction in the character and operation between “qualifying clubs” and proprietary clubs and premises which promote private functions, and considers that proprietary clubs and premises which promote private functions are very likely to contribute to cumulative impact in the stress area and will often not offer sufficient control over their members to promote the licensing objectives.
- 2.7. It is proposed to revise the Statement of Licensing Policy to make it clear that in the stress areas premises which restrict access to general members of the public, such as proprietary clubs and premises used for private functions will not be considered to be exceptions to stress area policies for that reason alone.

**Q4 Do you agree that proprietary clubs are very likely to contribute to cumulative impact in the stress area and will often not offer sufficient control over their members to promote the licensing objectives?**

**Q5 Do you agree that premises used for private functions, whether they be corporate or personal, are very likely to contribute to cumulative impact in the stress area and will often not offer sufficient control over their members to promote the licensing objectives?**

### **3. Extension of underground rail services**

- 3.1. The Mayor has announced that from 12 September 2015 a limited Tube service in central London will operate on a 24 hour basis on Fridays and Saturdays, with further extensions planned in future years. The present network of night buses will also be reviewed to complement the later service.

- 3.2. Tube services in central London currently cease at about 12.40am and the late night extension will significantly improve the transport provision to and from central London. This will include improving the available means for visitors and workers to get home from central London at later hours, and improve the availability of transport for persons wishing to come into central London at later hours.
- 3.3. The effective dispersal of customers, both from premises and from the stress areas, is regarded by the council as a key principle of its policy to promote the licensing objectives. Whilst the improved availability of the Tube will undoubtedly assist with this dispersal in part, additional persons brought into the city later at night, the opening of stations and running of trains may have a negative effect on the promotion of the licensing objectives.
- 3.4. The council is of the view that only after detailed assessments of how the introduction of the new service provision will impact on the city have been completed will the council be able to take a view on what revisions if any may be appropriate to its licensing policy.
- 3.5. In the revised Statement of Licensing Policy it is proposed to recognise the proposed changes to the Tube service and indicate that a review of the policy in relation to late night premises should take place at a later date, once the new transport arrangements are in place and their impact assessed.

**Q6 Do you agree that the policy should not be reviewed in anticipation of the transport changes, but considered at a later date?**

**4. Opening hours**

- 4.1. The Act is silent in regard to the meaning of opening hours, and yet regulations require every licence application and licence document issued to indicate the opening hours for the licensed premises.
- 4.2. The consumption of alcohol on licensed premises is not directly regulated as a licensable activity under the Act but is clearly relevant in assessing whether premises promote the licensing objectives. Similarly, the time to which customers are permitted to remain on licensed premises, and subsequently leave those premises, is also relevant. Notwithstanding therefore that all licences indicate their opening hours the council considers that it may be appropriate to condition a licence to restrict the time at which alcohol may be consumed on the premises or require that all customers leave the premises by a certain time in order to promote the licensing objectives.
- 4.3. In many cases licence holders, as a matter of good management, will restrict the sale and consumption of alcohol for a period of time before the end of opening hours, as part of a “winding down” strategy referred to in the current statement of policy.

- 4.4. It is proposed that the revised Statement of Licensing Policy will indicate that when determining opening hours for premises licensed for the sale of alcohol for consumption on the premises, it will, subject to other conditions or restrictions, impose conditions on a licence to restrict the time at which alcohol may be consumed on the premises and/or require that all customers leave the premises by a certain time where it considers it appropriate to do so to promote the licensing objectives.

**Q7 Do you agree that the council should impose conditions to restrict the hours during which customers may be permitted to consume alcohol and be permitted on licensed premises where it considers it appropriate to do so to promote the licensing objectives?**

## **5. Multiple licences for the same premises**

- 5.1. Increasingly, applications have been made for premises licences at premises where a licence is already in force. Typically the applicant is the landlord of the premises where the licence holder of the licence already operating is their tenant. The landlord in many cases is seeking what they term a “shadow licence” on the same or similar terms to the licence already existing.
- 5.2. The Act permits more than one licence to be in effect at any one time at the same premises and it has been established in law that the landlord may apply for a second or subsequent licence.
- 5.3. The council remains concerned however that the holding of additional licences has the potential to undermine the sanctions available to it in response to a review application under the Act. This would be the case if action was taken in respect of one of the licences in effect at the premises, but the premises continued to operate under the authority of a second licence which had not been affected by the review proceedings.
- 5.4. The council recognises that landlords have powers over their tenants outside of the licensing regime and would expect responsible landlords to exert that control to promote the licensing objectives. Where the landlord is also a licence holder of a premises licence in effect at the premises the council considers that the landlord has further responsibilities in respect of the operation of the premises to promote the licensing objectives. In order to promote the licensing objectives the council will take a holistic view of the licensing circumstances at the premise and when making an application to review one of the licences in effect at a premises the licensing authority will therefore consider whether it is

appropriate to review all the licences in effect at the premises in order to promote the licensing objectives, and encourage other applicants to do likewise.

- 5.5. It is proposed that the Revised Statement of Licensing Policy will state that when the licensing authority makes an application to review a premises licence to promote the licensing objectives at a premises, it will also consider whether it is appropriate to review all the licences in effect at the premises in order to promote the licensing objectives. Where the applicant for the review is not the licensing authority it will encourage the applicant to also consider whether it is appropriate to review all the licences in effect at the premises, and will itself consider bringing a review of any other licence in effect at those premises if it considers it appropriate to promote the licensing objectives.
- 5.6. It is proposed that the Revised Statement of Licensing Policy will state that it is the licensing authority's policy that all licences take effect when granted, and that the imposition of a condition which suspends the effect of a licence does not promote the licensing objectives.

**Q8 When an application to review a licence at a premises is being made, do you agree that the licensing authority should consider whether it is appropriate to review all the licences in effect at the premises in order to promote the licensing objectives, and to encourage other applicants to do so?**

**Q9 Do you agree that the licensing authority in order to promote the licensing objectives should have a policy that all licences take effect when granted?**

## **6. Events permitted to operate under a council Area Premises Licence**

- 6.1. Under the Licensing Act 2003 the City Council holds a number of its own premises licences, covering some of the City's busiest and highest profile areas (including Maida Hill, Piccadilly, Whitehall, Covent Garden, Leicester Square, Soho, Regent Street and Oxford Street). These are known as Area Premises Licences.
- 6.2. These licences, held by the council, enable the safe, controlled facilitation of event activities. Specifically, by making use of this framework, event organisers are enabled to submit their plans to the multi-agency LOSPG (Licensing, Operational and Safety Planning Group) event planning process, under the 'umbrella' of an area licence held by the Council. In this way proper consideration can be given to the whole range of factors that are relevant in deciding whether a given event proposal ought to be permitted, such as traffic and pedestrian congestion, local consultation, the appropriateness of an event to its proposed locale, and the management of litter and waste.

- 6.3. The use of the Area Premises Licences has been largely successful. The Area Premises Licences require a named person of experience and proven competence to be responsible for compliance with the set conditions, co-ordination and planning. The council's Special Events Group therefore holds the Area Premises Licences on behalf of Westminster City Council. There is a general recognition by all concerned that Area Premises Licences have a part to play in the overall licensing system. They can be ideal for small, low impact community event activities that align to defined criteria, removing a bureaucratic/regulatory burden, and have been used as such. They also assist in the facilitation of "last minute" event applications that the City Council wishes to support and they can afford the council a robust level of control over the way event activities are planned and executed on the ground.
- 6.4. In evaluating our use of Area Licences and talking to our partners and stakeholders, we have recognised that there have been instances where the use of an Area Premises Licence may not have been the most appropriate means of authorising an event; where the impact of an event has been significant and where the consideration of local resident/ward member and business views has not been as thorough as perhaps it should have been. Discussions have indicated that this is mainly associated with some of the large major impact and complex events which can sometimes cause significant disruption to local communities.
- 6.5. When an event proposal entails any form of licensable activity, the most appropriate means of licensing it must be identified by the council at an early stage. An event activity may be licensed by way of its own Premises Licence or, for event activities within the relevant geographic areas, permission can be sought to use one of the Area Premises Licences held by the City Council. The City Council wishes to ensure that local residents and others have the opportunity to have their say in appropriate circumstances regarding licensing decisions that may affect them and this includes the use of Area Premises Licences.
- 6.6. It is proposed that the Statement of Licensing Policy will state that an event will only be authorised under an Area Premises Licence held by the council when it is appropriate to do so to promote the licensing objectives, and will not do so where it considers that wider consultation of the application is considered appropriate.

**Q10 Do you agree that the council should only authorise events under its Area Premises Licences when it is appropriate to do so to promote the licensing objectives and ensure that persons likely to be affected by such events have had an opportunity to have their say?**

**Q11 In what circumstances do you consider that an event should, or should not, be authorised under an Area Premises Licence.**

## **7. Nudity in licensed premises**

- 7.1. Since the current statement of licensing policy was published the council has adopted legislation that requires premises providing lap dancing or striptease to hold a separate licence as a sexual entertainment venue (SEV). Prior to the adoption of the legislation nudity, striptease and sex related entertainment was regulated by the 2003 Act and subject to Policy NS1 in the Statement of Licensing Policy. The SEV licence now regulates the provision of sexual entertainment at these premises, not the premises licence.
- 7.2. It is arguable that not all activities involving nudity, striptease and sex related entertainment however require a SEV licence and, in updating Policy NS1 to take account of SEV licensing, it is intended to retain existing policies in relation to premises offering nudity, striptease and sex related entertainment which is not regulated by a SEV licence.
- 7.3. Revisions are proposed to the Statement of Licensing Policy to update Policy NS1 such that premises which are subject to SEV licensing will not be covered by this policy, but that existing policies in relation to premises offering nudity, striptease and sex related entertainment in premises which are not regulated by a SEV licence will continue to apply.

**Q12 Do you agree that in updating policy NS1 the council should retain control over nudity, striptease and sex related entertainment in premises which are not regulated by a SEV licence?**

## **8. Licensing of tables and chairs on the highway as part of a premises licence**

- 8.1. When making an application for a premises licence the extent of the premises is defined by the applicant. The premises may consist of a building or part of it, a private outdoor space associated with the building, or an area of public highway adjacent to the building.
- 8.2. A restaurant for example may seek to use tables and chairs on an area of the adjoining pavement in a similar way to the way it uses rooms inside its restaurant building. To enable licensable activities to be provided both inside the building and on the pavement

area the applicant may define the premises as including both the restaurant building and the area of the pavement it intends to use.

- 8.3. Whilst the premises licence may authorise the provision of licensable activities it cannot authorise the use of an area of highway for that activity. Permission for the use of the highway is considered separately, and in this example, a tables and chairs licence must also be obtained before the restaurant can operate any activity on the pavement. The tables and chairs licence will define the extent of the area, and the numbers of tables and chairs which may be used on the pavement.
- 8.4. The council is concerned that granting a premises licence which includes an area of public highway within a premises is confusing and may mislead by wrongly implying that permission for the use of the highway is being given. That is not to say that permission for the provision of licensable activities on the highway may not be granted where an appropriate tables and chairs licence is or will be in force and the licensing objectives would be promoted, but the council would prefer to permit such licensable activity to be conditioned as an exceptional “off sale” to an area appropriately authorised by a tables and chairs licence. An appropriate condition might state; The consumption of alcohol sold for immediate consumption off the premises shall be limited to any area of the highway immediately adjacent to the premises in respect of which the licence holder is in possession of a separate and current authorisation to place and use tables and chairs in that area.
- 8.5. It is proposed that the Statement of Licensing Policy clarifies the council’s intention that a premises licence should not generally include any area of highway intended for use for tables and chairs, and explain the relationship between the 2003 Act and the permissions required for the use of tables and chairs on the highway.

**Q13 Do you agree that including areas of the highway intended for use by tables and chairs in the premises licence can be misleading?**

#### **Other issues**

We welcome comments on any aspect of the review of the Statement of Licensing Policy not included above.

**Q14 Are there any other comments you wish to make or issues you wish to raise in relation to the policy which are not covered above?**

## Part 2 1<sup>st</sup> Stage Consultation on Cumulative Impact Areas

In this part of the review the council welcomes the submission of evidence where it is suggested that the cumulative impact of a significant number of licensed premises concentrated in one area is undermining any of the licensing objectives or where alternative measures may be appropriate. In particular, the council invites comment on whether the current stress area boundaries should be changed and why.

Paragraph 13.40 of Revised Guidance dated October 2014 issued under section 182 of the Licensing Act 2003 states: *As part of its licensing policy, the licensing authority may also wish to consider the use of alternative measures such as fixed closing times, staggered closing times and zoning within its area, providing such mechanisms are justified on the basis of the licensing objectives and are only presumptive, with final decisions continuing to be made in relation to individual premises on a case by case basis in accordance with what is appropriate to promote the licensing objectives. The licensing authority would be expected to include its intention to use such measures in its statement of licensing policy and justify doing so in order to orchestrate closing times so as to manage problems in the night-time economy based on the promotion of the licensing objectives. As with the creation of a CIP, the use of such mechanisms would create a rebuttable presumption and would apply in the event of representations being received.*

The council would also welcome submissions on whether it would be appropriate to use alternative measures, as described in Guidance above, to address issues of cumulative impact and manage closing times of premises.

The council will consider submissions and bring forward proposals, if after examining relevant evidence, it considers that changes to the current stress area boundaries or the introduction of alternative measures are appropriate to promote the licensing objectives. Proposals relating to this part of the review are not included in this paper and, in a 2<sup>nd</sup> stage, further consultation on specific proposals and identifying specific areas of the city will be undertaken once submissions have been considered and before any changes are introduced.

**Consolidated list of consultation questions:**

- Q1 Do you agree that the stress area policy relating to premises which sell alcohol but are not bars, pubs or restaurants should be clarified?**
- Q2 What conditions should be attached to such licences so as to ensure that they do not add to cumulative impact in the stress area?**
- Q3 Do you agree that if the sale of alcohol is limited to 20.00 hours then the premises are unlikely to add to cumulative impact in the stress area?**
- Q4 Do you agree that proprietary clubs are very likely to contribute to cumulative impact in the stress area and will often not offer sufficient control over their members to promote the licensing objectives?**
- Q5 Do you agree that premises used for private functions, whether they be corporate or personal, are very likely to contribute to cumulative impact in the stress area and will often not offer sufficient control over their members to promote the licensing objectives?**
- Q6 Do you agree that the policy should not be reviewed in anticipation of the transport changes, but considered at a later date?**
- Q7 Do you agree that the council should impose conditions to restrict the hours during which customers may be permitted to consume alcohol and be permitted on licensed premises where it considers it appropriate to do so to promote the licensing objectives?**
- Q8 When an application to review a licence at a premises is being made, do you agree that the licensing authority should consider whether it is appropriate to review all the licences in effect at the premises in order to promote the licensing objectives, and to encourage other applicants to do so?**
- Q9 Do you agree that the licensing authority in order to promote the licensing objectives should have a policy that all licences take effect when granted?**
- Q10 Do you agree that the council should only authorise events under its Area Premises Licences when it is appropriate to do so to promote the licensing objectives and ensure that persons likely to be affected by such events have had an opportunity to have their say?**

- Q11 In what circumstances do you consider that an event should, or should not, be authorised under an Area Premises Licence**
- Q12 Do you agree that in updating policy NS1 the council should retain control over nudity, striptease and sex related entertainment in premises which are not regulated by a SEV licence?**
- Q13 Do you agree that including areas of the highway intended for use by tables and chairs in the premises licence can be misleading?**
- Q14 Are there any other comments you wish to make or issues you wish to raise in relation to the policy which are not covered above?**

Consultation responses should be e-mailed to [licensingconsultation@westminster.gov.uk](mailto:licensingconsultation@westminster.gov.uk) or posted to Chris Wroe, Licensing Policy & Strategy Manager, Westminster City Council, 11<sup>th</sup> Floor City Hall, 64 Victoria Street, London SW1E 6QP.

**The closing date for the consultation is 15<sup>th</sup> May 2015.**

If you have any questions or comments on this consultation please contact Chris Wroe at [cwroe@westminster.gov.uk](mailto:cwroe@westminster.gov.uk) or go to the council website at [www.westminster.gov.uk](http://www.westminster.gov.uk).