

APPENDIX 3

From:

Sent: 08 June 2023 12:30

Subject: Objection to Licensing Application for 8 Imperial Square

Dear Cheltenham Borough Council,

Ref: Licensing Application 23/00788/PRMA - 8 Imperial Square - OBJECTION

We are local residents in Imperial Lane, having lived here for nine years. Like other homes, our home is directly opposite the rear of 8 Imperial Lane and we strongly object to this application to effectively turn the building into a pub/nightclub/cinema by granting an extensive licensing permission. It has planning permission to operate as a hotel only and not to have any outdoor events or activity at the rear of the property. The implications of this licensing application are to significantly change the use of the building from a hotel for private guests to a public entertainment centre, with all that that entails.

This licensing application should be seen in the context of planning application 22/01447/CONDIT which seeks to vary Condition 11 of permission 22/00334/COU. There are a number of objections raised against this variation application and most apply to this licence application. The two applications should be viewed together. Condition 11 was presumably originally imposed to recognise issues with outside dining and drinking in Imperial Lane, and the impact on the local residences. These issues have not changed.

We object to the licensing application on the grounds of noise, nuisance, crime and disorder (security and safety) and traffic. The rear of 8 Imperial Square directly faces local residences and the impact on residents' lives would be intolerable. Our objections are:

1. Noise:
 - a. The noise pollution from the activities under the licence would be significant and highly disruptive to us and other local residents. We already have significant noise issues from the existing local nightclubs - both noise from the clubs themselves and from the people who go to them, especially in the evening, late at night and in the early hours of the morning. Opening what would effectively be a nightclub directly opposite our home in a narrow lane is inappropriate.
 - b. The current noise levels are so great that we are limited in when we can open our windows after 8pm without disturbance. This is already a problem. A licensed premises on the basis proposed would mean we would be unable to open the windows at all (and even then we would still hear the noise).
 - c. This is a zoned residential area within the town. The lane is already noisy during the day due to passing people and local traffic, and especially in the evening and early

morning due to people using the nearby nightclubs and pubs. Providing extended licensing to operate between 8am and 2.30am and operating both indoors and outdoors would mean there would be significant further noise throughout the day and in the evening.

d. The licensing would apply to extended hours into the night - this would be highly disruptive. Unlike the other noise in the lane which is generally passing, this would be static noise and potentially continue all day. This would be directly in front of our lounge and main bedroom window causing significant disturbance.

e. The licence seeks approval for live events, live music, dance, films etc. This would again be highly audible, intrusive and disturbing to residents and is completely inappropriate for what the building was intended for and for the local area with its mix of businesses and residences.

f. Guests could well enter and exit the hotel at the rear from the lane directly opposite us. Based on current experiences of people accessing Imperial Lane, this would cause significant noise and disruption.

g. Imperial Lane is very narrow and noise echoes and travels upwards towards the apartments.

2. Nuisance:

a. The risk of public nuisance arising from late night drinking is very high and again inappropriate for the residences to the rear of the building.

b. The lane is very narrow and already has problems with local and delivery traffic, with blockages occurring regularly. There is likely to be an increase in traffic with drop-offs and illegal parking causing further disruption.

c. This will add to the noise and also create traffic disruption and further safety issues for local residents.

d. We already have the situation where people are regularly vomiting and urinating in our street - this would add to that issue.

4. Crime/Disorder/Security/Safety:

a. I would have serious concerns about security and residents' safety with all-day and late-night drinking and entertainment taking place directly opposite our apartment block and in the street. We have enough town centre issues already late at night with groups of drinkers and nightclubbers going to and leaving the clubs. There are already altercations at night in Imperial Lane and this would add to them.

b. There have been occasions when late night pub-goers and clubbers have attempted to get into our building - the risk of this would increase.

c. My partner and I would not feel safe at night stepping outside my house if this goes ahead.

I could understand a licence application to allow the hotel to serve drink to its limited number private guests. But this application takes it far beyond that and is effectively a change of use for the building.

Your sincerely,

3 Imperial Gate

Imperial Lane

Cheltenham

GL501PR

From:

Sent: 08 June 2023 15:58

Subject: Re: Objection to Licensing Application for 8 Imperial Square

Just to add some further points of concern - please include these with the email below:

1. We can hear the existing nightclubs very clearly - and they are around the corner, not opposite us - when they are playing recorded music. Even with 'doors and windows shut after 9pm' we will have huge noise disruption from 8 Imperial Square if they are holding events involving music (live and/or recorded), especially if they have a pulsating beat and lots of people there.
2. There could be visual disturbance or light pollution from bright and/or flashing lights in the windows or outside to the rear of the property.
3. I dont know what 'regulated entertainment' is - please can this be explained? If it is a catch-all for doing anything then this obviously increases the risks below.

Many thanks,

From:

Sent: 08 June 2023 17:45

Subject: Re: Objection to Licensing Application for 8 Imperial Square

A final point, in addition to the emails below:

The property is now advertising itself as a private members club. I believe they only have planning permission to operate as a hotel. The licence application is therefore wholly inappropriate and not relevant to operating a small hotel. The council need to be joined up on this. Please can a check be done on what planning permission they have to operate as a private members club?

I apologise for the piecemeal nature of this response. I only found out about the application today by chance (unforgivably) and was then told today is the deadline. There is a small blue notice about the application on the front of the hotel which is only visible if you go to the door, which is very set back from the main pavement. Tellingly, no blue notice is visible at the rear of the property, where the local residences are. I imagine there are other residents who would have had a say but who have been isolated from this process because they know nothing about it.

This is not a fair process

From:

Sent: 07 June 2023 10:18

Subject: 8 Imperial Square 23/00788/PRMA

Subject: Objection to Entertainment and Drinks Licence Application - No. 8 Imperial Square

Application number: 23/00788/PRMA

Dear Sir/Madam,

We are writing to express our strong objection to the entertainment and drinks licence application submitted by No. 8 Imperial Square. As residents of No. 11 Imperial Square (owners of Flats x and y), we believe that granting such a license would have several detrimental effects on the peaceful and safe residential environment we currently enjoy.

Firstly, the close proximity of No. 11's residential units to the proposed premises at No. 8 raises significant concerns. The potential noise, disturbance, and general commotion associated with a speak easy and night club operating until 0230 nightly would undoubtedly compromise the well-being and safety of the residents. Of particular concern is the impact this could have on the child residing in Flat x, No. 11 Imperial Square, who deserves an environment conducive to their growth and development.

Moreover, the quiet and peaceful character of Imperial Square, especially after 11 p.m. when events at the Town Hall have concluded, would be severely disrupted if this license were granted. The residents have chosen to reside in this area due to its tranquillity, and the introduction of a late-night establishment would irreversibly alter the atmosphere and negatively impact the quality of life for all residents.

Another major concern is the parking situation associated with No. 8. It is evident that there is insufficient parking available to accommodate the anticipated influx of patrons. This will undoubtedly lead to increased congestion, parking violations, and potentially hazardous situations for both patrons and residents alike. Additionally, the raised deck constructed in the parking area without planning permission exacerbates the traffic chokepoint, creating further difficulties for ingress and egress.

The issue of traffic congestion is further compounded by the lines formed for entry, including the roping off and restriction of resident access to the common pavement. This not only inconveniences residents but also poses potential safety risks in emergency situations where quick access is crucial. The disruption caused by such activities, particularly during festival seasons, further highlights the unsuitability of the proposed license in this residential area.

In light of the aforementioned concerns, we strongly urge the Cheltenham Borough Council to reject the entertainment and drinks licence application submitted by No. 8 Imperial Square. Granting such a license would compromise the safety, tranquillity, and overall well-being of the residents in this neighbourhood. We therefore implore the council to prioritize the interests and rights of the existing residents who have invested in this area for the purpose of a peaceful and secure home.

Thank you for considering our objections. We trust that the council will thoroughly evaluate the detrimental impact of this license on the community and make a decision that aligns with the best interests of the residents. We are available should you require any further information or clarification.

Yours faithfully,

Morbrooke Developments Ltd

4 Popham Close

Chilton Foliat

Hungerford

RG17 0WG

Subject: Objection to Entertainment and Drinks Licence Application - No. 8 Imperial Square

Dear Sir/Madam,

We are writing in our capacity as freehold owner of No. 11 Imperial Square to endorse the objections made by the residents of this building, namely xxxxx and xxxxx of Flats x and y and xxxxx and xxxx of Flat z.

We concur with their opinions that the granting of the proposed license in respect of No. 8 Imperial Square will have a detrimental effect on the environment surrounding our building and the residential safety currently enjoyed by our long leasehold tenants and occupiers. Of greatest concern is the potential noise, disturbance and anti-social behaviour generated by the late night opening hours and the likelihood that this will significantly impact the day to day lives of the residents of No. 11 Imperial Square.

The residents have made a strong case for the entertainment and drinks license in respect of No. 8 Imperial Square to be rejected so that the safety, tranquillity and wellbeing of all residents at No. 11 and the rest of the neighbourhood can be preserved.

We ask that the Council carefully considers the objections so that residents can continue to live peacefully in this exceptional location.

Yours faithfully,

Jeff Barnett (Director)

Morbroke Developments Ltd

11 Imperial Square
Flat x
Cheltenham
GL50 1QB

7th June 2023

Attn: Mr. Jason Kirkwood

Re: 23/00788/PRMA (8 Imperial Square)

Dear Licensing:

Please accept the following representations of interested parties xxxxx and xxxxxx with respect to the above-referenced license application (the "Application"). We own the leasehold and reside at 11 Imperial Square, Flat z, along with our 12-year-old son. Our home is only three doors down (approximately 18 metres) from the subject premises (the "Premises"). We are one of three residential flats at 11 Imperial Square. We are located on the first floor and our flat extends from the front of the building to the rear.

We strongly urge the Licensing Panel to reject the application in its entirety, for the reasons stated below. In the alternative, if any license is granted, such license should be narrowly circumscribed to meet the objectives of the Licensing Law.

1. Applicant's proposed outdoor activities would create a public nuisance and endanger public safety in contravention of the Licensing Law.

Granting the application as to Appellant's proposed outdoor activities would both create a public nuisance and endanger the health and safety of both the patrons at the Premises and the other residents and tenants of Imperial Square. To understand why, one must contextualize the Premises.

a. The Site

Both our home and the Premises are part of a terrace of Grade II* listed houses built circa 1834, located on Imperial Square, directly across from Cheltenham Town Hall.

[1] A photograph of the building, taken in the 1850s or 1860s, is in the collection of the Victoria & Albert Museum.[2] Built long before the automobile or the electric amplifier were invented, the walls are thin, the windows are single pane, ventilation depends on free air flow through open windows, and noise travels freely. In addition to the three

residential units in No. 11, there are additional residential units within earshot of the Premises both on the east side of Imperial Square and behind the Premises, in Imperial Gate.

Like many historic buildings, there is no public parking associated with the Premises. Parking for residents and business tenants consists of a limited number of spaces per terrace, arranged in a single row, slanted toward the west. Photographs showing the car park are included below.

There is a single point of ingress to the car park on the east end of the building, and a single point of egress on the west end.[3] This means that all traffic through the car park must, either on its way in or on its way out, pass in front of the Premises. Moreover, the car park is so narrow that many modern cars – including larger sedans, SUVs, delivery vans and tradesmen’s vehicles – must mount the pavement to pass behind parked vehicles. When there is scaffolding in front of any of the terraces to facilitate painting or repairs – as has been the case nearly continuously since we moved into the building in 2022 – the scaffolding blocks off the pavement and makes passage through the car park even more hazardous. Both the pavement and the parking surface in front of the terraces are, in large part, in poor repair.

As for the environment, while Imperial Square is bustling during the day, Imperial Square becomes a quiet, tranquil space in the evening. Events at the Town Hall conclude, for the most, part by 22:00 - 23:00 on the evenings they are held, and even those events have minimal impact on the area as they are indoors and everyone usually leaves the events in a short, compressed period of time and, as these are not alcohol focused events, the patrons are not boisterous or loud.

There is also minimal traffic at this time as most (if not all) of the businesses on Imperial Square have closed and there is minimal commuter traffic. We take our small dog for his final walk of the day around the Square each night at this time and so we know this information first hand. It is in this context one must consider the issues of public safety and public nuisance raised by the Application.

[1] See <https://historicengland.org.uk/listing/the-list/list-entry/1104370?section=official-list-entry> (accessed 7th June 2023).

[2] <https://collections.vam.ac.uk/item/O215221/imperial-square-cheltenham-photograph-francisfrith/?carousel-image=2008BW0971>.

[3] See <https://historicengland.org.uk/listing/the-list/list-entry/1104370?section=comments-and-photos>.

b. Applicant’s Proposed Outdoor Activities Would Create a Public Safety Hazard

Applicant seeks a license to serve alcohol and late-night refreshment both indoors and outdoors until 02:00 a.m., Mondays through Saturdays, and until midnight on Sundays. However, Applicant’s request for outdoor service must be denied, as any outdoor service would create a palpable public safety hazard.

First, the rear courtyard of the Premises is not available to Applicant for the purpose of supplying food or drink: Applicant sought and was denied planning permission for this

purpose. See Planning Permission 22/00334/COU. While Applicant initially appealed this condition, on 15 May 2023, Applicant abandoned their appeal of this condition. See Appellant's Rebuttal Statement, APP/B1605/W/22/3310900. We understand that the Licensing and Planning regimes are different. We further understand that the most restrictive decision of the two regimes is binding. Therefore, it is our understanding that the restriction in the Planning Permission will be controlling and so Applicant cannot serve food or drink in the courtyard.

The Application does not specify where "outdoors" Applicant seeks to conduct various activities. However, we assume that with the abandonment of their appeal of this condition, that they are not seeking a license to use the rear courtyard. However, if we are incorrect, and they still seek a license to use their back courtyard, we believe the Application should be denied on the same factual grounds upon which the planning decision was based as they constitute a nuisance under the Licensing scheme. Our son's bedroom is at the back of our flat and faces Imperial Lane. He has a large bedroom window on the wall facing Imperial Lane, which he leaves open most evenings for ventilation. The noise from Appellant's courtyard would be clearly audible from my son's bedroom making it impossible to sleep. Our flat has another large window at the back, which is to our combined kitchen and dining area, which flows into our living room. And so the noise from use of the courtyard would also negatively impact our ability to relax and enjoy the other living areas of our home, as well.

Based on the restriction included in the Planning Decision, the only outdoor space available to Applicant is, literally, in the car park to the front of the Premises. The safety risk that would be created by serving alcohol and food to patrons in an open active car park – let alone one as space restricted as that in front of the Premises – is both obvious and palpable.

In an apparent attempt to mitigate this fact, Applicant has, in the last week, built a partially enclosed wooden platform in the car park. In fact, this platform only exacerbates the safety risk.

First, the platform was built – in the curtilage of a Grade II* listed building, in the midst of the Conservation Area, and directly across from the Town Hall – entirely without planning permission, health and safety inspections, or consultation with Fire or Police officials.

Second, Appellant's platform is only 250 cm [4] from the edge of the pavement. It thus creates a hazardous choke point that not only endangers drivers and pedestrians, but will inevitably obstruct firefighters, ambulance crews or police should they be called to any of the 13 houses in the terrace. Moreover, a wide vehicle (such as a delivery van or lorry) enter the car park, or should scaffolding be erected at the Premises or either of the adjoining houses that blocks the pavement, the car park may well become entirely impassable and the hazard exacerbated even further.

Moreover, Applicant's platform does nothing to mitigate the inherent risk of mixing inebriated patrons and moving vehicles. Patrons will still have to cross back and forth across the traffic lane to use the platform. In addition, during the past Cheltenham Festival, Applicant installed velvet ropes to block the pavement in front of the Premises.

Not only does this practice deny residents and passers-by use of the pavement, but it also further constricts the available space and aggravates the hazard.

Applicant cannot meaningfully mitigate this risk. Applicant's proposed hours of operation for outdoor activities begin at 10:00 a.m., thus including the entire business day, when the car park is most active. Even after business hours and on weekends, the residents at No. 11 frequently use their cars, [5] and always need free access in case of emergency or other urgent business. We cannot be expected to safely navigate through a crowd of revellers in the car park every time we need to go out.

Third, as previously noted and as documented in the photographs below, the car park and pavement are generally in poor repair. It is reasonable to expect that most patrons will reach the Premises – which is in the centre of the terrace – by traversing the pavement and/or car park. This in itself can be hazardous to patrons, particularly at night and especially to those under the influence of alcohol, and it is a hazard over which Applicant has no control. There are also serious implications for the other occupants of all 13 of the Imperial Square terraces regarding their liability for injuries sustained by Applicant's patrons in the car park or on the pavement, the occupants' ability to insure against such risks, and the cost of such insurance given Applicant's proposed activities.

The Licensing Panel must “try to ensure the safety of people visiting and working in licensed premises.” (Cheltenham Borough Council, Licensing Policy Statement (Dec. 2020), sec. 3.16 (hereinafter “Policy Statement”).

Considerations include whether “patrons can arrive at and depart from the

[3]17(d)), “whether people standing or sitting outside premises are likely to cause obstruction or other nuisance” (id. sec. 3.22(d)), and “the extent and location of areas proposed to be set aside for the consumption of food and alcoholic drink and for smoking” (id. sec. 3.22(l)). On all of these points, the Application as related to outdoor activities fails, and must be denied.

[4] For a point of reference, a Land Rover Discovery with mirrors extended is 222 cm wide. See <https://www.automobiledimension.com/land-rover-car-dimensions.html>.

[5] For example, one of the authors of these representations is, by avocation, a working musician, and frequently departs or returns in the late hours. premises safely” (id. sec.3.17(d)), “whether people standing or sitting outside premises are likely to cause obstruction or other nuisance” (id. sec. 3.22(d)), and “the extent and location of areas proposed to be set aside for the consumption of food and alcoholic drink and for smoking” (id. sec. 3.22(l)).

c. Applicant's Proposed Outdoor Activities Would Create a Public Nuisance

As with safety issues, the Licensing Panel must examine “wider considerations affecting the residential population and the amenity of the area,” including “littering, noise, street crime and the capacity of the infrastructure” (Policy Statement sec. 1.19). The Borough Council recognizes that “[p]roximity to residential accommodation” is likely to have an “adverse impact on the peace and quiet of local residents,” noting particularly the “[p]otential noise and nuisance from people leaving and entering the premises”; the

“potential noise impact on local residents” created by the “[u]se of external areas for carrying out the licensable activities”; and that “alcohol led premises such as pubs, bars and nightclubs . . . are more likely to be associated with crime and disorder and public nuisance” (id. sec. 6.42.)

As stated, our home is approximately 18 metres from the Premises. Not unusually for an historic building, we have three floor to ceiling single pane sash windows with antique glass at the front of our flat. We have two other large sash windows at the back of the flat (facing Imperial Lane). The walls are relatively thin and completely lack any acoustic treatment. With the windows closed, we could hear the conversations of Applicant’s workers as they built Applicant’s (illegal and ill-advised) platform in the car park. With the windows open – and the only ventilation available in the main living area is to open the windows – we can hear normal conversation from across the road.

Quite obviously, the nightly revels in the car park proposed by Applicant would disturb the peace and quiet enjoyment of our home. Indeed, this was precisely the conclusion drawn by the Borough Council when assessing Applicant’s proposed activities in the rear courtyard – the same activities Applicant now proposes to undertake in the car park, only a few metres from our flat. As noted by the Planning Authority, “there are . . . a significant number of residential properties nearby [the Premises], including the two apartment blocks to the rear of the site, known as Imperial Gate, and several flats within this same group of listed terraced properties fronting Imperial Square” [i.e., our home and our neighbours in No. 11].

(Statement of Case on Appeal, LPA Ref. 22/00334/COU, p. 4 (emphasis added)). The Council concluded that “there is clearly potential for the proposed uncontrolled use of the external courtyard for dining and drinking to generate significant noise and disturbance. The Council considers that this would impact significantly upon the living conditions of occupiers of neighbouring residential units” (Id. p. 7 (emphasis added).) As noted by the Council’s Environmental Health team:

Residents of these properties will be subjected to disruption to their normal use of their properties by noise from users of this area at all times that it is open. It is not practical to expect the operators of the premises to restrict the numbers of people using the outside areas during the entire hours of opening, or for them to install some type of barrier that would enclose the area to such an extent as to make noise from users inaudible. It is to be expected that users of the area are likely to be noisier as the evening progresses which has potential to significantly disrupt the local residents' use of their property.

(Id. at p. 8 (emphasis added).) The Environmental Health team also noted the potential for disturbance from “customers arriving and leaving late at night,” and that “[i]f residents, especially in warmer weather, opted to open their windows during the use of this outside area, there is a likelihood of noise disturbance impacting them using their home” (Ibid.).

The impacts on our neighbours and us from Applicant’s proposed outdoor activities in the front of the building would be precisely the same as those described by the Council relating to Applicant’s activities in the rear of the building. Applicant’s request to license any outdoor activities must be denied.

2. Applicant's proposed activities, even if moved indoors, still create a public nuisance and endanger public safety in contravention of the Licensing Law.

Even if Applicant's proposed activities are moved out of the car park and into the building, they nevertheless endanger public safety and create a public nuisance to such a degree that the Application should be denied.

For example, conducting the activities wholly indoors does not mitigate the physical danger to patrons from traversing a hazardous car park to reach the Premises, nor does it silence the noise they will make when "arriving and leaving late at night." Applicant proposes to permit patrons to exit and re-enter the Premises to smoke and converse – but where will they go? [6] Into the car park, obviously, thus creating the same danger and as much noise (or nearly so) as if Applicant were serving them outside. Applicant proposes to regulate entry to the Premises. But where will the unadmitted patrons wait?

Again, on the pavement and in the car park, obstructing both vehicular and pedestrian traffic and generating constant noise. Moreover, Applicant proposes additional indoor activities that would exacerbate the noise issue. For example, Applicant seeks a license to present live music. In a building where one can easily hear one's neighbours' television programmes through the floors and walls, and in which extensive acoustic treatment is unlikely to be deemed consistent with its Grade II*-listed character, the notion that Applicant could ensure that an amplified bass guitar or live drums are "effectively inaudible inside the nearest noise sensitive premises" beggars belief. (Policy Statement, App. D.) Moreover, the Council has recognised that "[p]laying of music can cause nuisance both through noise breakout and by its effect on patrons, who become accustomed to high sound levels and to shouting to make themselves heard, which can lead to them being noisier when leaving [the] premises." (Id. sec. 3.24.)

As the above demonstrates, granting the Application would effectively destroy much of the peace and quiet that we and our neighbours – a mere 18metres from the Premises – enjoy, and are entitled to enjoy, in our homes.[7] We therefore respectfully urge the License Panel to deny the Application in its entirety.

[6] It should be remembered that Applicant has already been denied the use of the rear courtyard of the Premises for these purposes.

[7] *Although not directly related to the Licensing Objectives, we urge the Licensing Panel also to consider the deleterious impact Applicant's proposed activities might have on the value of our homes. We should not have to bear the cost of Applicant's poor investment decisions and flawed business model.*

3. If any license is granted for the Premises, it should be narrowly circumscribed and subject to stringent conditions.

We believe the Application should be denied in its entirety. If, however, the License Panel is inclined to grant some license for the Premises, such license should be no broader than required and subject to stringent conditions that protect our quiet enjoyment of our home.

In addition to the conditions listed in the Application, and any other applicable conditions set forth in the Policy Statement, Appendix C, any license granted should be subject to the following limitations and conditions:

- Applicant states that “[t]his application is for a members only club.” Yet the Application states that Applicant wants to serve “members of the public . . . during the Cheltenham Festivals to those customers who have pre-booked.” The limitation that “members of the public” who

have “pre-booked” is meaningless. Applicant fails to define what it means to “pre-book” or to limit the number of people so admitted, nor does Applicant propose any effective means to enforce such limitations. As Applicant seeks to run a “members only club,” any license granted should be limited to the club’s members and a limited number of personal guests. There should be no license that includes “members of the public” to any degree.

- As Applicant business appears to be directed to the Cheltenham Festivals, its hours of operation should be limited to those days on which said Festivals occur. If this is impractical, Applicant should only be permitted to open Thursday through Sunday, consistent with the operation of Imperial Haus, located further down the road toward the Promenade.

- As determined by the Council in connection with Applicant’s planning permission, Applicant’s hours of operation should conclude at 10:00p.m. on all days the business is open.

- To mitigate both the physical danger to, and the nuisance created by, patrons entering and leaving the Premises, patrons should be barred from traversing the car park or pavement in front of the other houses in the terrace, and should be required to approach the Premises from the public pavement. (How patrons will get from the public pavement to the Premises is Applicant’s problem to sort.)

- Patrons should be barred from congregating in front of the Premises for any reason, whether to queue, smoke or converse. No alcohol should be consumed outside the Premises at any time. Patrons should be admitted to or turned away from the Premises upon arrival, and must disperse immediately upon leaving. Patrons should never be permitted to congregate on the pavement.

- Applicant should not be allowed to block, restrict, or otherwise impair residents’ access to the car park or pavement at any time. The (illegal) platform constructed by Applicant in the car park must be removed.

- No music, live or recorded, should be played that is audible outside the Premises, and no film should be exhibited that is audible outside the Premises.

Respectfully submitted,



Photo 1



Photo 2



Photo 3