



Chief Officer of Police Representation in relation to an application for grant of a premise licence made under Part 3 **Section 17** Licensing Act 2003 (S18 Licensing Act 2003)

Details of person making representation	
Name of Chief Officer of Police	Chief Superintendent Loudon
Postal Address: (Divisional Headquarters)	Maidstone Police Station Palace Avenue Maidstone Kent ME156NF
E-mail address	licensing.west.division@kent.police.uk
Telephone Numbers:	
Licensing Co-ordinator	Ellen Shaw
Licensing Officers	Daniel Hunt PC 11044 - 01732379247
Details of premises representation is about	
Name of Premises:	Market House
Address of premises:	130 High Street Tonbridge Kent TN91DE
Date application received by police	12/06/2025
Date representation sent to Licensing Authority	23/06/2025
<p>All representations must be made within 28 days of receipt of initial application</p> <p><i>The Licensing Act 2003 (Premises Licences and Club Premises Certificates) Regulations 2005. Part 4 Reg. 22.</i></p>	

The Chief Officer of Police has received an application for the grant of a premises licence made under the provisions of Section 17 Licensing Act 2003, and under Section 18 of that Act, asks the Licensing Authority to consider these representations in respect of: -

Prevention of crime and disorder	x
Public Safety	x
Prevention of public nuisance	x
Protection of children from harm	x

Is this a representation regarding the Designation of Premises Supervisor under S18 (9) Licensing Act 2003? No

If yes complete the appropriate statement: N/A

Please give the reason for the representation and detail the evidence supporting it under the appropriate headings:

This premises currently operates as a café during the day and restaurant and bar of an evening and already operates under the authorisation of a premises licence. The current licence authorises the sale of alcohol Monday to Wednesday 11:00 till 17:00, Thursday 11:00 till 23:00, Friday to Saturday 11:00 till 00:00 and Sunday 11:00 till 23:00. Recorded music is permitted Monday to Wednesday 07:00 till 17:00, Thursday 07:00 till 23:00, Friday 07:00 till 00:00, Saturday 08:00 till 00:00, Sunday 09:00 till 23:00 and New Years Eve and Christmas Eve 08:00 till 01:00. Live music is authorised Sundays only, 11:00 till 15:00.

It is assumed that should this new licence be granted; the current licence would then be surrendered. The proposed Premises Licence Holder and Designated Premises Supervisor for this application are the same as those listed within the current premises licence. The new licenced hours being sought see a significant increase to those already authorised. If granted, as applied for, this new licence would permit the sale of alcohol Sunday to Thursday 09:00 till 23:00 and Friday to Saturday 09:00 till 03:00, with Christmas Eve and New Years Eve also being 09:00 to 03:00. Recorded music will increase Monday to Thursday from 08:00 till 23:00, Friday and Saturday 08:00 till 03:00 and Sunday 09:00 till 23:00, Christmas Eve and New Years Eve would also see recorded music authorised until 03:00. It is noted that all recorded music regarding the ground floor will end at 23:00, and music until 03:00 is only permissible in the basement area. Live music is to mirror the authorisation for recorded music.

These increases suggest a change of direction in the operation of the premises with a potential move away from being a café, bar and restaurant and becoming more of a late-night bar, club and events space, particularly with regards to the later hours and operating much further into the nighttime economy. If granted, it is my understanding that this would be the latest opening licenced venue of this type located within Tonbridge Town Centre, with other venues authorised alcohol sales on a Friday and Saturday to just 02:00. Operating into the early hours as a late-night bar or club venue inevitably increases the risk of alcohol related crime, disorder and antisocial behaviour, and the operating schedule of the premises needs to show and evidence an understanding of this and indicate what steps and conditions are intended to be taken to mitigate these risks. At this stage the application is lacking in detail and does not provide sufficient information for Kent Police to support it. For example, with regards to security the application states:

"We employ Security Industry Authority (SIA) licensed door staff to manage entry, monitor patron behaviour and prevent disorder".

The key detail lacking from this statement includes on what days of the week are door staff to be employed, and what time will they be on duty, number of door staff required, what their role and responsibilities are and so on.

With regards to CCTV, it states:

"We maintain a comprehensive CCTV system covering all areas of the premises to deter criminal activity and assist in investigations. Our staff regularly monitor the CCTV feeds to ensure a swift response to any incidents".

The key detail lacking with regards to CCTV could include the time periods for which CCTV will be retained, whether footage will be provided to police if requested, if the system will be regularly checked to ensure there are no faults and so on.

Kent Police are not opposed to the granting of this licence in its entirety, providing that the operating schedule is such that it mitigates the increased risk of crime, disorder and antisocial behaviour commonly

associated with late-night venues of this type, also showing consideration to this being a busy town centre location that also includes residential premises nearby. Kent Police are aware of recent noise complaints attributed to this premises that are being or have been dealt with by the Local Authority. In addition to those already proposed, Kent Police seek the following proposed conditions and measures:

CCTV

CCTV will be provided in the form of a recordable system, capable of providing pictures of evidential quality in all lighting conditions particularly facial recognition.

1. Cameras shall record all ingress and egress to the premises, fire exits and all areas where the sale and supply of alcohol occurs.
2. Equipment must be maintained in good working order, with recordings correctly time and date stamped. Recordings MUST be kept in date order, kept for a period of 31 days and handed to police or authorised officers on reasonable request and within 48hrs of the request being made.
3. The premises licence holder must ensure at all times a DPS or appointed member of staff are on the premises and are capable and competent at downloading CCTV footage in a recordable format to the police and local authority on reasonable request.
4. The recording equipment and discs/tapes shall be kept in a secure environment under the control of the DPS or other responsible named individual.
5. An operational daily log report must be maintained and endorsed by signature, indicating the system has been checked and is compliant. In the event of any failures, any action taken is to be recorded.
6. In the event of technical failure of the CCTV equipment the premises licence holder or DPS must report the failure to the police licensing officer immediately. (licensing.west.division@kent.police.uk).

Staff training

All persons who sell or supply alcohol to customers must have licensing training.

1. Training must take place within six weeks of employment.
2. Any new employees will be supervised until the training has taken place.
3. Refresher training should be repeated a minimum of every six months or earlier if required due to changes of legislation.
4. Training records must be kept on the premises and shall contain the nature, content and frequency of all training.
5. Records must be made available for inspection by police, police licensing officer and authorised officers from the Council on reasonable request either electronically or in hard copy.

Notices

The premises shall display notices at the exit reminding customers to leave quietly and be respectful of nearby residents.

Contact

A direct telephone number for the duty manager at the premises shall be available at all times the premises is open for licensable activities. This telephone number is to be made available to residents and businesses in the vicinity.

Incident recording

An incident log shall be kept at the premises, and made available on request to a police officer, police licensing officer or Council authorised licensing officer. It must be completed within 24 hours of the incident and will record the following:

1. All crimes reported to the venue.

2. All ejections of patrons.
3. Any complaints received concerning crime and disorder.
4. Any incidents of disorder.
5. All seizures of drugs or offensive weapons.
6. Any faults in the CCTV system, searching equipment or scanning equipment.
7. Any refusal of the sale of alcohol.
8. Any visit by a relevant authority or emergency service.

Challenge 25

The Licensee shall adopt a "Challenge 25" policy, where all customers who appear to be under the age of 25 and attempt to purchase alcohol or other age-restricted products, shall be asked for proof of their age.

The Licensee shall prominently display notices advising customers of the challenge 25 policy.

The following proof of age documents are the only ones to be accepted:

- Proof of age cards bearing the "Pass" hologram symbol
- UK Photo Driving Licence
- Passport
- Military ID

Security

On Friday and Saturday there shall be a minimum of 3 SIA registered door supervisors on duty from 21:00 till close of the premises. On Christmas Eve and New Years Eve there shall be a minimum of 3 SIA registered door supervisors on duty from 21:00 till close of the premises. At all other times the premises will risk assess the need for door supervisors and will employ SIA registered door supervisors when deemed necessary.

Admittance / Re-admittance

There shall be no admittance or re-admittance to the premises after 01:30.

Personal licence holder

There will be a personal licence holder on duty at the premises from 21:00 till close each Friday and Saturday. There will be a personal licence holder on duty at the premises from 21:00 till close on Christmas Eve and New Years Eve.

Drugs Policy

The Premises Licence holder shall have a written policy in relation to drugs which will include search, seizure and disposal of drugs and weapons. Staff will be provided with training on the policy, including drugs awareness.

PC Dan Hunt 11044

PP.Ch. Supt Loudon 10582

West Division Area Commander

Date: 23/06/2025