

EXPERT WITNESS REPORT of Sylvia Oates, Six Till Six Ltd.

Wendy's - Application for Late Night Refreshment London Borough of Camden

1. Introduction and Scope

1. I have been instructed to provide an independent expert opinion in relation to an application for late-night refreshment at Wendy's, 189-191 Camden High Street. The hours sought are 23:00-05:00 Monday to Sunday. The restaurant currently has a late night refreshment licence permitting it to operate until Midnight Sunday-Thursdays and until 01:00 on Fridays and Saturdays.
2. My professional experience spans over 25 years within the licensed hospitality sector, including advising operators, local authorities, Business Improvement Districts and police forces on licensing, compliance, and safety within the evening and night-time economy. My work includes the development and delivery of national initiatives focused on vulnerability, safeguarding and safer socialising. I was selected as a taskforce participant in the UK Government's *Licensing policy sprint: joint industry and HM government taskforce* in 2025, and in November 2024 I was invited to 10 Downing Street to participate in a roundtable with the Prime Minister and the Home Secretary in relation to supporting the government's target of reducing violence against women and girls by half within the next decade.
3. I am CEO of Six Till Six, a consultancy firm specialising in promoting safe and welcoming social spaces through partnership working. We are the consultants currently engaged to develop and implement the Greater London Authority's (GLA) Mayoral Licensing Reforms, working with the GLA and national government departments to write the London Strategic Licensing Policy, develop legislation and consult with local authorities, businesses and other stakeholders. Between 2022 and 2024, we were appointed to deliver the GLA's Business Friendly Licensing project, which combined research into licensing practice with funded borough pilots to test business-friendly approaches. Through this project, we worked with Camden Council as it was one of the boroughs that received funding for a Business Friendly Licensing Pilot to develop a more innovative and business friendly Statement of Licensing Policy.
4. We are very familiar with the local Camden context and the council's approach to licensing, as we were fortunate enough to work with Camden Council's

licensing team on the research document that informed the licensing committee's decision in 2024 not to publish further Cumulative Impact Assessments in the borough. In 2025, we also conducted research to help inform the licensing committee's decision on whether to remove, retain and/or reform its Late Night Levy. The committee voted to retain the levy but reform it, which included adding late night refreshment premises to the relevant licence types that the levy included.

5. Six Till Six oversees the national Best Bar None accreditation scheme, which is the nationally recognised gold standard in embedding best practice in licensed premises and partnership working in communities. Six Till Six also set up the national organisation overseeing the successful implementation of the Ask for Angela initiative. As such, we are seen as a leader in safeguarding and vulnerability management, operational best practice and partnership working to create safer, more successful social spaces.
6. This report considers the nature of the proposed operation and the promotion of the four licensing objectives. It also references:
 - Camden's *Statement of Licensing Policy 2025-2030*,
 - The Section 182 Statutory Guidance to the Licensing Act 2003
 - The *Camden Evening and Night Time Strategy (2024)*,
 - The Mayor of London's *London Plan (2021)*, in particular policy HC6 (Supporting the Night Time Economy),
 - The Mayor of London's draft *London Strategic Licensing Policy (2026-2031)*
 - Camden's *Preventing Violence Against Women and Girls Strategy 2026-2029*,
 - *Camden's Evening and Night-Time Citizens' Assembly Report (2023)*,
 - *Camden's Evening and Night-Time Citizens' Assembly Annex (2023)*,
 - The *Camden Local Plan (2017)*,
 - *We Make Camden 2022-2030*,
 - The *Camden Community Safety Partnership Delivery Plan 2024-2027*, and
 - The *National Licensing Policy Framework (2025)*.
7. These documents form part of a wider policy framework which informs how licensing decisions are made at both local and London-wide levels, including the relationship between licensing, planning, community safety and economic development. A consideration of this wide policy context is now encouraged (see the s.182 Guidance, para 1.19) and therefore considered to be good practice.

8. This report focuses on the extent to which the proposed operation can make a positive contribution to the licensing objectives and to the wider policy aims set out within that framework.
9. In doing so, I have considered the characteristics of the premises, the nature of the proposed operation and the context in which it will operate, drawing on my professional experience of the night-time economy and the management of licensed premises.

2. Nature of the Premises

10. The application relates to a quick-service restaurant operating under a structured and standardised model.
11. Key characteristics include:
 - a non alcohol-led offer,
 - relatively short dwell times – both for onsite purchases and for delivery,
 - continuous staff supervision,
 - a transactional customer flow,
 - clearly defined operational procedures.
12. The restaurant has a capacity of 60 seated upstairs, 3 seated downstairs and an ordering area with space for up to 4 people ordering at the kiosks and a waiting area of approximately 20 customers (though this is rarely reached).
13. The customer demographic at night is 20-40 years old, higher disposable income individuals. These are mainly local to the area or tourists. On a weeknight, local customers are more common. The majority of late night customers come to Wendy's to wind down before moving on.
14. The premises are located close to many of the main transport hubs in Camden Town, including Camden Town underground station. The premises is not a magnet of activity in Camden; it serves existing footfall rather than generating it.
15. In licensing terms, this places the premises in a materially different risk category from alcohol-led venues.
16. Camden's Statement of Licensing Policy recognises that restaurants/café's: "provide a valuable contribution to the community... and are not generally associated with high levels of crime, disorder, anti-social behaviour and nuisance" (paragraphs 8.2-8.3, p.55). This is caveated on the following page (p.56), where it is highlighted in paragraph 8.10 that "Customers of these venues [late night refreshment] can often be intoxicated and may be difficult to

control” and in 8.11 “The consumption of hot food and hot drink away from the premises can lead to litter which causes a public nuisance in the area”.

17. The operator recognises that late night refreshment can present challenges in certain contexts and manages them effectively. This is an important starting point for assessing the application.

3. Policy Context

18. Licensing decisions must be made in accordance with the Licensing Act 2003 and with a view to promoting the four licensing objectives. In doing so, licensing authorities are also required to have regard to the Section 182 Guidance issued by the Secretary of State, their own Statement of Licensing Policy and relevant local and strategic policies.
19. Paragraph 1.19 of the Section 182 Guidance states: “In coming to a decision on individual licensing applications, licensing committees should have regard to relevant local plans and strategies – such as those relating to town planning, the night-time economy, or business support – provided these considerations are consistent with the licensing objectives and the authority’s published licensing policy. For example, licensing authorities in the area covered by the London Mayor should consider the London Plan 2021, which sets out a clear framework for the development of London over the next 20-25 years and the Mayor’s vision for Good Growth.”
20. Paragraph 1.18 of the same guidance states: “When making licensing decisions, all licensing authorities should consider the need to promote growth and deliver economic benefits.”
21. In my opinion, this is an important and often under-emphasised aspect of the licensing framework. It confirms that licensing is not intended to operate solely as a restrictive or risk averse regime, but as one which balances the promotion of the licensing objectives with the need to support economic activity, employment and the vitality of local centres.
22. This approach is reinforced by the *National Licensing Policy Framework* (2025), which emphasises that licensing should be “flexible and responsive – a tool for enabling innovation and investment, not just managing risk” (p.3), and that “The Licensing Act is designed to be enabling, not prescriptive” (p.7). Decisions should support broader ambitions, including business growth, high street revival and community cohesion.

23. It also states that licensing should be “permissive by design” (p.9) and that authorities should avoid unnecessary prescription, instead supporting operators in demonstrating how they are effectively and proportionately managing risks to the licensing objectives. Framework hours are also highlighted in section 5.1 of the *National Licensing Policy Framework (2025)* as “...reference points, not blanket conditions, and each application is still considered individually”.
24. At a London-wide level, the draft *London Strategic Licensing Policy (2026-2031)* provides further clarity on the intended direction of travel. It sets out a vision for a licensing system that is evidence-led, proportionate and enabling, and which recognises responsible operators as partners in delivering safe, inclusive and economically vibrant places.
25. The draft policy makes clear that licensing decisions should:
 - support economic growth, socialising and culture
 - recognise the safety and health benefits of well-managed night-time activity
 - avoid unnecessary costs and burdens on responsible operators
 - support a diverse and inclusive hospitality and night-time offer
26. Importantly, it also recognises that well-managed licensed premises can contribute positively to safety and community wellbeing, including through increased footfall, natural surveillance and the provision of staffed and regulated environments.
27. The policy further highlights the importance of flexibility in licensing, including the use of staggered and later opening hours, which can support more even dispersal, reduce congestion and contribute to safer night-time environments.
28. The London Plan (2021), and in particular Policy HC6 (Supporting the Night-Time Economy), aligns closely with this approach. It requires boroughs to support the growth and diversification of the night-time economy, particularly in town centres and areas of established night-time activity.
29. Policy HC6 emphasises that boroughs should:
 - promote night-time activity where appropriate
 - improve access, inclusion and safety
 - diversify the range of night-time uses, including extending the opening hours of existing daytime premises
 - support well-managed venues as part of a balanced night-time offer
30. The supporting text to Policy HC6 makes clear that the night-time economy plays a significant role in London’s economic and social life, and that there are

a range of benefits to promoting night-time activity, including job creation, increased tourism and opportunities for social interaction.

31. It also recognises that increased activity can contribute to safety through passive surveillance, and that diversifying the range of uses, particularly beyond alcohol-led activity, can help reduce crime, anti-social behaviour and the fear of crime.
32. Importantly, Policy HC6 does not advocate restriction as a default response to potential impacts. Instead, it emphasises the need to manage and diversify areas with higher concentrations of activity, recognising that a broader mix of uses can contribute to improved outcomes.
33. At a borough level, the *Camden Statement of Licensing Policy 2025-2030* is the key document used when considering licensing applications. The policy aligns with other local Camden policies, ensuring that a holistic approach is taken in decision making.
34. One of the key aspects that the policy considers is equality, diversity and inclusivity, as highlighted in paragraph 1.29 “We have an ambitious equality agenda to address the needs of people who have traditionally been disadvantaged or treated less favourably based on their race, sex, disability, age, gender reassignment, marriage and civil partnership, pregnancy and maternity, sexual orientation or religion/belief” and 4.38 “Promoting diversity, equity, and inclusion is not only a matter of social justice but also essential for building harmonious, respectful, and progressive societies”. This highlights Camden’s desire for a licensed sector that is diverse and accessible to all.
35. The policy *We Make Camden 2022-2030* sets out the Council’s overarching vision for the borough. It emphasises the importance of creating conditions for inclusive economic growth, supporting vibrant and sustainable neighbourhoods and ensuring that Camden is a place where people feel safe, welcome and able to participate in community life. The licensing regime plays an important role in delivering this vision, particularly in managing the evening and night-time economy in a way that balances vitality with the needs of residents.
36. The *Camden Local Plan (2017)* provides the borough’s planning framework and is a key document within the development plan. It seeks to create safe, socially mixed and resilient communities, strengthen Camden’s economy, support successful and vibrant town centres, promote high quality and safe places and streets, improve health and wellbeing and protect the quality of life that makes Camden an attractive and dynamic place for residents, workers and visitors.

37. Within this context, the current *Camden Local Plan (2017)* recognises that food, drink and entertainment uses form an important part of Camden's town centre offer and contribute to the borough's attractiveness and vibrancy, while also requiring their impacts to be carefully managed. It promotes development that supports natural surveillance, safer streets and public areas, and expects businesses to take responsibility for reducing opportunities for crime and antisocial behaviour through effective management and design.
38. The *Camden Community Safety Partnership Delivery Plan 2024–2027* is also referenced in Camden's licensing policy. The Community Safety Partnership (CSP) brings together statutory and voluntary agencies to tackle crime and improve safety across the borough, with the overarching aim of creating a safer Camden for people to live, work and visit.
39. The CSP delivery plan identifies several strategic priorities directly relevant to the licensing regime, including tackling drug-related activity, reducing antisocial behaviour, addressing hate crime and discrimination, improving women's safety and preventing serious violence.
40. It also emphasises the importance of partnership working, early intervention and the effective management of the night-time economy. This includes measures such as improving safety in licensed premises, influencing licensing policy, tackling nuisance issues such as public urination and litter and supporting better collaboration between operators, authorities and local communities.
41. This policy framework establishes a clear and consistent position. Licensing should be:
 - evidence-led and proportionate
 - enabling well-managed growth and diversification
 - supportive of safety through design, management and activity
 - aligned with wider objectives relating to inclusion, wellbeing and economic vitality
42. When these documents are considered together, as required by the Section 182 statutory guidance, they establish a clear policy framework in Camden which supports a well-managed, inclusive and diverse evening and night-time economy. They emphasise the importance of safety, partnership working and responsible operation and recognise the role that licensed premises can play in contributing positively to both the local economy and the wider community, provided that their impacts are appropriately controlled.

43. In my opinion, this is the appropriate context for assessing the current application. It requires consideration not only of potential risks, but also of the extent to which the proposed operation can make a positive contribution to the licensing objectives and to the wider functioning of the evening and night-time economy.

4. Thematic Assessment of Positive Impacts

4.1 Contribution to Safeguarding and Feelings of Safety

44. A consistent theme across national, London-wide, and local policy is that safety in the evening and night-time economy is achieved through the provision of well-managed, visible, and accessible environments. This includes spaces where individuals can seek assistance, where staff are present and where activity contributes to natural surveillance.
45. National policy recognises the importance of hospitality venues in creating “safe, vibrant high streets” and “inclusive safe spaces for all” (*National Licensing Policy Framework*, pp.10-11).
46. At a local level, Camden’s policy framework, including its Evening and Night-Time Strategy, Citizens’ Assembly findings and Violence Against Women and Girls Strategy, emphasises the importance of creating environments where people both feel safe and are safe, and where venues play an active role in supporting that aim through partnership working and responsible operation.
47. For example, Camden’s Evening and Night-Time Citizens’ Assembly concluded that “being safe and feeling safe is essential to Camden’s evening and night-time strategy” and that “no matter who you are, everyone deserves to feel safe and be safe at night in Camden” (*Camden’s Evening and Night-Time Citizens’ Assembly Report 2023*, p.33).
48. Safeguarding includes the broader role venues can play in supporting vulnerable individuals, providing places of refuge and contributing to a safer and more inclusive night-time environment.
49. The proposed operation can contribute positively to these objectives. As a food-led premises, it provides an alternative to alcohol-led environments and is likely to attract a broader demographic, including individuals who may not wish to use traditional late-night venues. This aligns with policy objectives

around diversification and inclusivity and supports the creation of a more balanced evening and night-time offer.

50. The presence of a well-managed, late-night premises with staff on site contributes to visibility and oversight within the local area. In my experience, such environments can provide reassurance, reduce the perception of risk and offer a point of assistance for individuals who may feel vulnerable in the night-time economy.
51. Wendy's has committed to training all team members in the Ask for Angela initiative and signing the London Mayor's Women's Night Safety Charter. Wendy's is also in the process of submitting an expression of interest in becoming a Safe Haven. These agreements and commitments build on the work Wendy's is already doing to promote Public Safety, including conflict management training for all staff. This is consistent with Camden's emphasis on coordinated, partnership-based approaches to improving safety as highlighted in the *Camden Statement of Licensing Policy 2025-2030*, paragraph 6.12, particularly in relation to the protection of women and girls and other vulnerable groups (*Camden Statement of Licensing Policy 2025-2030*, paragraph 4.30).
52. In my opinion, these measures demonstrate that the operator understands and is willing to contribute positively to Camden's local safeguarding priorities, is capable of managing its own risks and that it is willing to align its day-to-day operation with them in a practical and visible way. In my opinion, that is directly relevant to both the Public Safety and Prevention of Crime and Disorder licensing objectives and the support of vulnerable individuals within the night-time environment.

4.2 Supporting a More Balanced and Inclusive Night-Time Economy

53. A consistent theme across national, London-wide and local policy is the need to support a more balanced, inclusive and diverse evening and night-time economy. This includes moving beyond a reliance on alcohol-led activity and encouraging a broader range of uses that are accessible to different groups within the community.
54. The *London Plan* (Policy HC6) places particular emphasis on the diversification of the night-time economy, including the extension of opening hours for existing daytime premises such as cafés and restaurants. This reflects a recognition that a wider mix of uses can support inclusivity and contribute to a more sustainable and well-managed night-time environment.

55. Similarly, the Draft *London Strategic Licensing Policy* highlights the importance of supporting a diverse and inclusive hospitality offer, including spaces that are not centred on alcohol consumption, and which respond to changing patterns of socialising. It recognises that such diversification can support social cohesion, improve accessibility and contribute to safer environments.
56. At a local level, the *Camden Evening and Night-Time Strategy (2024)* identifies a need to diversify the night-time economy, including the promotion of “inclusive, non-alcohol-led experiences” (p.8).
57. The same direction of travel is evident in Camden’s Citizens’ Assembly process. The Assembly report identified inclusivity as one of the five key themes emerging from pre-assembly engagement, including the need for the evening and night-time to cater for “younger people, older people, families, LGBTIQ+ people, disabled people and carers” (*Camden’s Evening and Night-Time Citizens’ Assembly Report 2023*, p.11).
58. The annex also indicates a significant level of demand for alcohol-free space and records repeated calls for “spaces that don’t focus on alcohol” and “more non-alcoholic events or spaces” (*Camden’s Evening and Night-Time Citizens’ Assembly Annex 2023*, pp.16, 24-25).
59. In my opinion, the proposed operation aligns directly with these objectives. As a food-led premises, Wendy’s Camden provides an alternative late-night offer that is distinct from alcohol-led venues and is capable of attracting a broader demographic, including younger people, families, night workers and those who may not wish to engage with traditional late-night drinking environments.
60. This type of provision can contribute to a more balanced distribution of activity across the evening and night-time economy, reducing reliance on a narrower range of uses and supporting a more inclusive environment overall.
61. The availability of late-night food provision is also an important consideration in its own right. Evidence at a London-wide level, such as the research report *Night Time Workers* produced by University College London and Didobi for the Mayor of London in May 2023, highlights the scale of the night-time workforce and the need for accessible services outside traditional hours. Premises of this nature can therefore play a practical role in supporting both workers and visitors, contributing to the overall functioning of the night-time economy.
62. Further to this, when considering accessibility provisions at night, Wendy’s operating practices ensure that their premises are accessible and welcoming to all:

- step-free access to the venue
- accessible toilets are available to those who need them at all times of operation, with no requirement to be a customer
- vegetarian and halal menu offering
- [Company-wide policies](#) to foster a more inclusive culture
- Wendy's is also committed to implementing Ask For Clive in its premises to promote LGBTQ+ inclusion, create welcoming spaces and enforce a zero-tolerance policy against LGBTQ+ discrimination and hate, building on its existing policies and procedures on this topic.

63. In my opinion, these factors demonstrate that the proposed operation is consistent with the direction of policy and can make a positive contribution to the diversification, inclusivity and resilience of Camden's evening and night-time economy.

4.3 Provision of Managed and Regulated Late-Night Space

64. A further key principle within the policy framework is that night-time activity should, where possible, be accommodated within well-managed and regulated environments rather than displaced into unmanaged public space.

65. Both the draft *London Strategic Licensing Policy* and the *London Plan* recognise that well-managed premises can contribute to safer and more effective night-time environments by increasing activity, supporting natural surveillance and providing structured, supervised spaces for people to gather.

66. The *National Licensing Policy Framework* also supports the use of flexible and, where appropriate, extended opening hours, recognising that staggered patterns of activity can reduce congestion, improve dispersal and contribute to the overall management of the night-time economy.

67. The central Camden Town area is a well-established night-time destination, with significant levels of activity already occurring late into the evening.

68. The availability of a well-operated, food-led premises provides an opportunity for that activity to take place within a controlled environment, with staff present and with clear management oversight.

69. This contrasts with unmanaged public space, where there is limited supervision, fewer opportunities for intervention and a greater potential for issues to arise without appropriate support or oversight.

70. The proposed operation is therefore capable of contributing positively to the management of late-night activity by:

- providing a staffed and supervised environment
 - lighting the restaurant in a way that is calming for those who have been in darker licensed premises
 - offering a place where individuals can remain or relocate in a controlled setting
 - supporting a more gradual dispersal of people through the area
71. This is further supported by Wendy's operations that seek to dissuade individuals from loitering or anti-social behaviour, including:
- playing classical music during licensed hours
 - the ability to switch free wifi off during licensed hours
 - continuing to prevent open containers or alcohol from being consumed on site
72. In my experience, such premises can play an important role in reducing pressure on the public realm and in supporting the overall management of the night-time economy, particularly when operating alongside other venues and services.
73. In my opinion, the proposed extension of hours should therefore be understood within this context. Rather than creating new or additional unmanaged activity, it has the potential to support the controlled and proportionate management of activity that is already taking place within the area.
74. This is consistent with the wider policy objective of enabling well-managed, appropriately controlled night-time activity and is particularly relevant to the licensing objectives of the prevention of crime and disorder and public safety, as well as to broader safeguarding considerations.

4.4 Positive Contribution to the Public Realm

75. The relevant national, London-wide and local policy framework reviewed when considering this application recognises the importance of the public realm in shaping how the evening and night-time economy is experienced. Well-managed activity can contribute positively to the vibrancy, safety and overall functioning of an area, particularly in locations with established night-time use.
76. The *London Plan* identifies that active uses, including hospitality premises, can increase footfall and natural surveillance, contributing to safer and more welcoming environments. Similarly, the draft *London Strategic Licensing Policy* highlights the role that well-managed premises can play in supporting vibrant and successful high streets.

77. In practical terms, active frontage, lighting, staff presence and visible management can all contribute positively to natural surveillance and to the sense that the public realm is observed, supported and used responsibly. This is reinforced by the Citizens' Assembly's "Place & Space" theme, which supported better use of existing internal and external spaces, enabling spaces to open later where appropriate, and creating better information about what is happening in Camden in the evening and night-time.
78. The application to vary the licence includes a condition in relation to door supervision, which states: "The operator will continue to risk assess the need for SIA security at times outside of those specified under condition 14 of Annex 2. Where it is determined that SIA security is required during additional times, the licence holder shall employ a minimum of two (2) SIA-registered supervisors, with a minimum of one (1) situated at the main entrance of the venue; and with a log sheet to be kept (and available to the police on reasonable request) showing who was working on any given day)". This highlights its commitment to safeguarding and responsible operating practices.
79. The operator also actively manages litter and cleanliness associated with the premises. Wendy's ensures that their premises and the area in front of their premises are kept clean and clear of litter at all times. During licensed hours, a litter pick of the surrounding area in accordance with the conditions on the licence.
80. Another benefit of the restaurant opening at night is the provision of toilet facilities, where there are few other options in Camden Town at night. This includes an accessible provision accessed via a "Radar Key". The availability of late night toilets promotes customer dignity, comfort and welfare and may help reduce some forms of nuisance in the public realm, such as street fouling. This is something of particular note as the applicant has highlighted that the nearest council-owned public toilets have been closed for over a year.
81. In my opinion, the proposed operation has the potential to make a positive contribution to the local public realm, including perceptions of safety and the area's presentation and overall character. This is relevant to the prevention of public nuisance and to broader objectives relating to placemaking, safety and the management of the evening and night-time environment.

4.5 Alignment with Best Practice and Partnership Working

82. A further consistent theme across national, London-wide and local policy is the importance of partnership working and the role of operators in supporting wider safety and management initiatives.
83. The draft *London Strategic Licensing Policy* emphasises that effective licensing relies on collaboration between licensing authorities, police, businesses and communities and encourages early engagement, shared responsibility and proportionate approaches to addressing risk.
84. Camden's Licensing Policy and Evening and Night-Time Strategy include proposals to implement a Licensing Charter to "encourage and embed best practice principles" (paragraph 1.11). This reflects an approach that encourages operators to go beyond minimum compliance, engage with local initiatives and contribute to shared safety objectives. Once the Licensing Charter is published, Wendy's Camden has indicated that it would be willing to engage with it and, so far as reasonably practicable, implement its requirements.
85. The same collaborative approach was reflected in the Citizens' Assembly, whose "Working together" theme emphasised that communities, organisations, businesses and Camden Council should work together for mutual benefit and that local people should be able to contribute to the future of Camden's evening and night-time.
86. The applicant has demonstrated a willingness to engage with recognised safety initiatives and training programmes, and an openness to participating in local schemes and partnerships where appropriate.
87. The applicant has agreed to explore further ways to support safety, including:
 - Signing the Women's Night Safety Charter for London
 - Submitting an expression of interest in becoming a Camden Safe Haven
 - Implementing the Ask For Angela campaign to support anyone who becomes vulnerable in the premises through training, policies and posters; including becoming a signatory of the Ask For Angela Pledge.
 - Implementing Ask For Clive in the premises to highlight that they are a safe and welcoming space for all.
88. Wendy's has also agreed to become a member of the national steering group to develop a late night refreshment assessment module under the Best Bar None accreditation scheme. This will support Wendy's and other late night refreshment operators to not only meet their licensing requirements as they are doing already, but also implement best practices to receive accreditation and be the gold standard in safer socialising, providing an inclusive, welcoming and well-managed space.

89. Wendy's Camden is currently a levy payer within Camden Unlimited BID and is keen to explore ways to work more closely with the BID in the future.
90. Wendy's Camden is now subject to the Late Night Levy in Camden, as this has been expanded to include late night refreshment premises operating between midnight and 6am. This will raise an additional contribution from the restaurant to support the costs of managing the night-time economy.
91. The applicant has also indicated a willingness to engage with relevant local initiatives as they develop, including those relating to safeguarding and responsible operation. This reflects the expectation, set out in policy, that operators should work collaboratively with local partners to identify and address issues at an early stage.
92. In my opinion, this alignment with best practice and partnership based approaches is an important factor in assessing the application. It supports the conclusion that the premises is likely to operate in a responsible manner and to contribute positively to the wider management of the evening and night-time economy. This is relevant to both the Public Safety and Prevention of Crime and Disorder licensing objectives.

5. Conclusion

93. This report has considered the proposed variation within the context of the Licensing Act 2003, the relevant statutory guidance and the wider policy framework at local and London-wide levels.
94. These documents, taken together, establish a clear and consistent direction of travel. Licensing should be evidence led and proportionate, should support well-managed growth and diversification and should recognise the role that responsible operators can play in contributing to safe, inclusive and economically active environments.
95. In my professional opinion, the application aligns with Camden's policy objectives, supports the licensing objectives and can make positive contributions to Camden's evening and night-time economy.
96. These include:
 - supporting safeguarding and contributing to feelings of safety through a visible, staffed and accessible environment
 - contributing to a more balanced and inclusive night-time economy through a food-led, non alcohol-focused offer

- providing a managed and regulated space within an area where late-night activity already exists
- contributing positively to the public realm through active frontage, oversight and responsible management
- aligning with best practice and partnership based approaches to safety and place management

97. These factors are relevant to the licensing objectives and more broadly to the identification and support of vulnerable individuals within the night-time environment.

98. In my opinion, the proposed variation should therefore be understood in terms of its capacity to contribute positively to the functioning of Camden's evening and night-time economy, with appropriate risk mitigations in place.

99. On that basis, and subject to appropriate and proportionate conditions where necessary, it is my professional opinion that the application is consistent with the licensing objectives and with the wider policy framework and is capable of being granted.