



Wembley  
Middlesex HA9 0FJ

TEL 07867183907

Email:

mohammed.serdouk@brent.gov.uk

WEB [www.brent.gov.uk](http://www.brent.gov.uk)

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To: Fresh Line Ltd,  
Subway, 45 Bridge Road,  
London HA9 9AG

### **LICENSING ACT 2003**

**Licence: Variation**

**Reference: 29225**

Applicant: **Fresh Line Limited**  
Premises: **Subway, 45 Bridge Road, HA9 9AG**

20 September 2023

Dear Sir, Madam,

### **Licensing Representation to the Variation Application for the Premises Licence for 'Subway, 45 Bridge Road Wembley HA9 9AG.'**

I certify that I have considered the application shown above and I wish to make a representation that the likely effect of the grant of the application is detrimental to the Licensing Objectives for the reasons indicated below.

**An officer of the Licensing Authority, in whose area the premises are situated, who is authorised for the purposes of exercising its statutory function as a 'Responsible Authority' under the Licensing Act 2003.**

**The application has been made to vary a premises licence under section 34 of the Licensing act 2003.**

The Licensing Authority representations are primarily concerned with the four licensing objectives.

- the prevention of crime and disorder.
- public safety.
- the prevention of public nuisance.
- the protection of children from harm.

**The Application:** The application is for an existing fast-food restaurant which already has a Late-Night Refreshment License. Currently the LNR allows sales from 23.00 to 00.00 hours Monday through and until Thursday and 23.00 to 02.00 hours Friday until Sunday.

This variation is now asking for a Late-Night Refreshments on 24/7 basis. In addition to this the venue falls within the Wembley Triangle CIZ – link below.

[www.brent.gov.uk/business/licences-and-permits/alcohol-club-and-entertainment-licences/premises-licence#ciz](http://www.brent.gov.uk/business/licences-and-permits/alcohol-club-and-entertainment-licences/premises-licence#ciz)

### **Cumulative Impact Zone (CIZ)**

The Council's current Licensing Policy came into effect 7th January 2020. Crime and complaints assessments in 2015, did not identify any requirement for a CIZs. However, since 2016 there has been a significant and notable increase in alcohol related crime and anti-social behaviour which is having an adverse impact in some areas and neighbourhoods generating complaints from residents, councillors, and the Police. This is undermining the licensing objectives and also has potential to undermine the vitality of Brent's town centres.

Data captured from various sources including alcohol related police and ambulance call outs have been mapped and have shown suitable evidence to implement CIZs in the specified areas.

Although the CIZ are designed for alcohol licensed venues it illustrates the high crime levels in this part of Brent which is why the CIZ's were introduced.

Allowing this venue to operate on a 24/7 basis is only going to add to an already high level of crime in the area. Attracting more people, a vast number of whom will be under the influence of alcohol will add to the crime and ASB in this area of Wembley. The venue has residential dwellings directly above with residents requiring sleep during the early hours of the morning.

### **Summary**

The Statement of Licensing Policy states that any licence application in a CIZ area will need to demonstrate with evidence that its operation will not add to any cumulative impacts that the CIZ is seeking to address. Further, new applicants and those applying for variations would be required to demonstrate how their premises will not contribute negatively to those areas.

The effect of adopting a CIZ is to "create a rebuttable presumption" that applications for licences which are likely to add to the existing cumulative impact will normally be refused (or subject to certain limitations) unless the applicant can demonstrate that there will be no negative cumulative impact on the licensing objectives.

The operating schedule fails to demonstrate that a grant will not lead to a negative cumulative impact on one or more of the licensing objectives and to the contrary add to the issues of an existing saturated area.

It is on this basis, that the Licensing Authority ask that the application for a variation to premises licence is **refused**.

Yours Sincerely

Mohammed Serdouk  
Licensing Enforcement Officer  
Brent Council