

**From:** Piers Warne <Piers.Warne@TLTsolicitors.com>  
**Sent:** 31 January 2022 10:43  
**To:** Shah, Councillor Sonia <Cllr.Sonia.Shah@brent.gov.uk>  
**Cc:** Robert Hayes <Robert.Hayes@Iceland.Co.uk>; Business Licence <business.licence@brent.gov.uk>  
**Subject:** Swift Stores premises licence application Wembley Central  
**Importance:** High

Dear Councillor Shah

I represent the applicant, Swift Stores, in relation to their premises licence application for Unit 19a Wembley Central, London HA9 7AF. We have been informed that following the consultation process that you have made a representation against this application. We have been told that now the consultation period has ended that this is the only representation.

We have read your representation carefully and understand that you have a concern about street drinking in the area. We hope that by giving a little context to the applicant and the application, this may assist in allaying those concerns.

**About the Applicant**

Swift stores is a new concept from Iceland. In March 2021, Iceland converted an existing high street store located in Four Lane Ends, Newcastle upon Tyne into the first Swift convenience store in the UK. Operating independently as Swift Stores Limited under the brand 'Swift' this new concept has proven to be a success within the local community. As a result Swift Stores Limited are seeking to make the site at Wembley Central the second store in the portfolio, with plans for a further 10-12 sites in London in 2022/23.

The proposed unit at Wembley Central is a significant development both in its own right and in terms of the wider area providing regeneration and creating a number of good, reliable jobs for the local community. It is anticipated that the store will create c.15 jobs split between full time and part-time positions, thereby offering opportunities to a broad range of Brent residents to find a position that suits their lifestyle.

Benefits to our customers shall include:

- Enhanced choice of healthy and fresh produce.
- A substantial frozen food offering, something which many competitors are unable to offer.
- A range of 'fridgeable' lines. This not only improves food affordability for households with lower incomes, but helps to reduce food waste too.
- A Food2Go range of sandwiches, snacks, pasta dishes and chilled beverages allowing customers to eat on the go, fitting in with the very busy lifestyle that many of our customers lead.
- Fresh coffee from the in-store Costa express machine.

The sale of alcohol, whilst ancillary to the grocery offer, forms a vital component in respect of commercial viability of this premises. Put simply, a customer who is looking for a complete grocery offering will quickly move on to another retailer if they cannot obtain a complete shop from Swift. The range of alcoholic products and pricing are designed not cater to, or appeal to, street drinking. Swift is committed to selling alcohol responsibly. The premises will operate a 'Challenge 25 Serve 18' policy for the sale of alcohol. Age Restricted Sales training is mandatory to all staff selling alcohol prior to working on the shop floor. Such training is delivered via e-learning modules and contains knowledge checks to assess colleague understanding. Training is provided upon company induction and refreshed at regular intervals of not more than 6 months.

**Measures directed toward preventing/ reducing street drinking**

Swift will have access (through Iceland) to both the Retail Alcohol Standards Group (**RASG**) and the Wine Spirit Trade Association (**WSTA**). These trade bodies represent the licensed retail section and meet frequently to share best practice, innovations and know-how relevant to the responsible retail of alcohol. In addition, Iceland Foods has recently become a supporter of Community Alcohol Partnerships (**CAP**) working closely with the Local Authority, Police, Public Health and other relevant bodies to ensure that alcohol is not only sold responsibly from the premises but that any

localised issues such as underage drinking, street drinking and other associated harms caused by drinking are addressed.

Having operators in Brent able to set a 'benchmark' for high standards in terms of responsible retailing and working with the responsible authorities, in particular the police, can increase standards overall. Our operating schedule makes it clear that we understand your concerns and why granting a licence to this premises will not exacerbate the issues you have identified.

#### **Conditions within the application**

The following have been offered as conditions on the premises licence that go directly to this issue (please note that the numbers relate to the condition number as it sits within the operating schedule):

**7.** The premises shall install and maintain a comprehensive CCTV system that complies with the following conditions:

(a) All entry and exit points will be covered enabling frontal identification of every person entering in any light condition.

(b) The CCTV system shall continually record whilst the premises is open for licensable activities and during all times when customers remain on the premises.

(c) All recordings shall be stored for a minimum period of 31 days with date and time stamping.

(d) Viewing of recordings shall be made available immediately upon the request of Police or authorised officer throughout the entire 31 day period.

**8.** Notices shall be prominently displayed advising customers that CCTV is in operation.

**9.** There shall be no more than 10% of the shop floor area given over to the display of alcohol.

**10.** Alcohol shall not be located in the immediate vicinity of the entrances and exit to the premises but shall be in an area in which it can be monitored by staff at all times.

**11.** No super-strength beer, lagers or ciders of 6% ABV (alcohol by volume) or above shall be sold at the premises except for premium 'craft' beers, lagers or ciders.

**14.** Outside of the hours authorised for the sale of alcohol and whilst the premises are open to the public, the licence holder shall ensure that all alcohol within the premises (including alcohol behind the counter) is secured in a locked store room or behind roller blinds, or locked grilles, locked screens or locked cabinet doors so as to prevent access to the alcohol by both customers and staff.

**31.** All spirits and other high value alcoholic products (over £25 in value) will be sold from behind a kiosk where it is inaccessible to customers.

#### **Conditions to apply at the time of large scale events being held at Wembley stadium, where Police intelligence indicates such measures are necessary.**

**28.** A list of alcoholic products, unit sizes, pack sizes for multi-packs, prices and any discounts on sale at the premises at the time will be made available to the Licensing Authority and/ or Police on request.

**29.** The premises licence holder will work with the Police to draw up and maintain a list of alcoholic products associated with street drinking in the area and an action plan to ensure that as far as practicable any such items sold by the premises are retailed in such a way as to deter street drinkers purchasing alcohol from the premises

#### **Conclusion**

I hope that this letter give you some confidence that the applicant takes your issues seriously and is committed to ensuring that their operation does not exaserbate the street drinking issues that are of concern to you. I am also instructed that my client would be delighted to discuss this application with you further should you wish- for instance, I would be happy to set up a video call if you feel it would be of use.

I am copying in the licensing team for their information.

Kind regards

Piers

Piers Warne  
Legal Director  
for TLT LLP