

From: Kelcher, Councillor Matt <Cllr.Matt.Kelcher@brent.gov.uk>
Sent: 24 November 2025 10:50
To: Business Licence <business.licence@brent.gov.uk>
Cc: Patel, Councillor Mili <Cllr.Mili.Patel@brent.gov.uk>; Chan, Councillor Jumbo <Cllr.Jumbo.Chan@brent.gov.uk>
Subject: Representation Against Application 36684 – Harlesden Cumulative Impact Zone

Dear Licensing Team,

I wish to make a formal representation against Application 36684 on the basis of all four licensing objectives, as the premises are located within the Harlesden Cumulative Impact Zone (CIZ), referred to by the applicant as the Cumulative Impact Assessment (CIA) area.

I am sure my co councillors in copy would join me in advocating for a refusal.

Grounds for Representation

1. Cumulative Impact Zone Policy

- The presence of a CIZ means that granting a new licence should only occur where the applicant can demonstrate in the operating schedule that they would not be adding to the cumulative impact.
- The applicant states that granting the licence would be “unlikely to add to cumulative impact already experienced in the area.” This does not meet the policy requirement of “would not add impact.” By their own admission, the applicant cannot guarantee zero additional impact, which is the standard required under the guidance.

2. Evidence from CIA and Local Issues

- Guidance under Section 182 states:
“Anyone making a representation may base it on the evidence published in the CIA, or the fact that a CIA has been published.”
- Craven Park Road, within the Harlesden CIZ, has a recognised problem with street drinking linked to drug dealing, driven by the high availability of alcohol from numerous outlets.
- At the most recent Safer Neighbourhood Ward Panel meeting on 19 November, attended by residents, police, and councillors, street drinking on Craven Park Road was identified as one of the three ward priorities.

3. Public Safety and Crime Prevention

- Increased alcohol availability in an area already suffering from street drinking and associated crime will undermine efforts to reduce anti-social behaviour and drug-related activity.

4. Public Nuisance and Protection of Children

- Street drinking contributes to disorder and creates an unsafe environment for families and children in the area.

Policy and Decision-Making

If Brent Council decides to grant this licence, it must provide the applicant, the Chief Officer of Police, and all parties who made relevant representations with clear reasons for granting the application, including any reasons for departing from its own policy.

Given the existing situation on Craven Park Road and the applicant's inability to demonstrate compliance with the CIZ policy, I respectfully request that Application 36684 be refused.

Best wishes,

Matt

Cllr Matt Kelcher

Labour Councillor for Harlesden and Kensal Green Ward

Chair, Planning Committee

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