



THE
LICENSING GUYS
LICENSED TO SUCCEED

The Licensing Guys
3rd Floor, Princess House,
The Square,
SHREWSBURY
SY1 1LW

18th May 2026

Dear Representor,

Re: Application for a Premises Licence – Newsfare, Craven Park Road.

The Licensing Authority has shared your representation with us so we are aware of your concerns about our application for a Premises Licence.

First and foremost, we would like to thank you for taking the time to respond to the consultation and share your valuable feedback, which we have carefully considered.

CIA Policy Grounds

Your concerns are centred on the premises lying within the current Cumulative Impact Assessment Area (CIA) and attendant Policy (CIP) which established a Cumulative Impact Zone (CIZ) which entailed Craven Park Road. The Assessment was founded on CI data from 2022, which was adduced as part of the processes that are the legal pre-requisite when this last CIA was conducted. That CIP was adopted by the Council on 21st November 2022. ss12 of s5A of the Licensing Act 2003 (as amended by the Policing & Crime Act 2017) sets the longevity of a CIA as a “period of three years beginning with the publication of the cumulative impact assessment or a revision of the cumulative impact assessment.” Consequently, in our submission the CIA approved on 21st November 2022 would have to have been revisited, reconsulted upon and reapproved by Full Council by 20th November 2025. To date, no replacement CIA appears to have been adopted.

In a previous Licensing Sub Committee Hearing in Brent on 12th January 2026, the Council’s position (based on their legal advice they had received) is that the CIA was re-approved by the passing of a new Statement of Licensing Policy on 18th November 2024. We too have taken advice from a top Legal 500 firm of licensing lawyers, and in their opinion this simply cannot be right. Firstly, the longevity of a

CIA is clearly laid down as a maximum of three years, and secondly before the expiry of a pre-existing CIA the Authority MUST consult upon continuing its CIA in accordance with the Act as per ss7 et seq and ss12 of s5A of the Licensing Act 2003. This clearly has not happened as the published Council's Statement of Licensing Policy still relies on the 2022 data and CIA in the 2026 Hearing(s).

It also transpired at the Hearing held in January that the Police data used in that CIA included ALL incidents of Crime & ASB in the locality. We argued that this simply cannot be right, as only alcohol-related Crime & ASB incident data can be adduced and used in a formulation of a CIA. Under the regime governing crime data in England & Wales, the requirement to record crime in accordance with the Home Office Counting Rules (HOCR) and the National Crime Recording Standard (NCRS) has been in place since April 2002 across all 43 police forces. The specific requirement for police forces to tag incidents with contextual "crime flags", such as marking an incident as "alcohol-related" came shortly afterwards. Updates to the 2013 rules - most recently refreshed in April 2025 - have reinforced the importance of these contextual flags. Thus, the data provided by the Police for the CIA back in 2022 could have referred to anything - skateboarding, drugs, graffiti, absolutely anything. This application sits before the Licensing Authority which draws its powers from the Licensing Act 2003 and is concerned solely with Licensable Activities. Consequently, and in our submission, the Police data which founded the 2022 CIA was not sufficiently refined enough to decide anything specific about licensable activities in general or the over-consumption or irresponsible provision of alcohol in particular.

All these points were argued in detail before the Licensing Authority at that same Hearing regarding the Premises Licence. The Legal Advisor to the Panel explained at the outset of the Hearing was that the proper way to challenge the 'existence' of the Council's CIA is through a Judicial Review. We accepted that position at the time in order to progress to the full Hearing, but do not necessarily accept that position. Clearly any decision arrived at by a Council Committee which took into consideration matters which have no legal basis through their expiry can be appealed to the Magistrates. As it transpired, the Premises Licence was granted so any Appeal by the applicant was no longer appropriate. The Panel issued that Licence, having heard all the arguments both for and against the grant, with a very comprehensive raft of Conditions appropriate to a Convenience Store operating in Craven Park Road – for which we are very grateful. That same raft of Conditions has been replicated in the operating schedule of the Newsfare application which is the subject of this discussion.

From our further correspondence with the Licensing Authority on the matters raised above, Ms LEGISTER from the Licensing Authority has assured us that the Authority is currently reviewing its CIA and the data that feeds into it, and I look forward to any revision of the CIZ in the near future. In fact, I would very much like to be included in the Consultation process.

In the meantime, if you will allow me, I would like to set this application in context and then address you on each of the matters you raise...

Background

The applicant has successfully operated Newsfare for a considerable time without ever having come to the attention of any of the authorities or attracted any adverse criticism from any residents or neighbours. They have made a significant financial investment in these premises so, like you, wish to protect the local amenity of the area in every respect and are alive to the concerns you raise.

Quite simply we are on the same side. No one benefits if the area isn't cared for, so our applicant will operate in a safe, legal, compliant, professional and responsible manner to ensure this business continues to contribute positively and does not cause issues to anyone. The applicant has no interest in nurturing a street-drinking population in the vicinity. These individuals primarily seek high ABV products at discount prices, and usually purchase one unit at a time. This is far from the customer avatar we wish to attract, encourage or service.

The Operating Schedule you have examined which forms part of our application is based entirely on the recently issued Licence referred to beforehand, and provides full details of the measures included in our original application. It has been scrutinised by the Responsible Authorities (Police, Environmental Health, Children's Services, Planning, The Home Office, etc.). The Authorities are all satisfied that the sale of alcohol from this premises, in accordance with the measures proposed, would promote the Licensing Objectives, and not undermine them. Else they would have provided evidence against the application, as is their statutory duty.

Crime & Disorder

As business owners we wish to operate in a safe neighbourhood and any increase in crime would likely have a negative impact on all businesses in the area, including ours, driving customers away. Our family-friendly business seeks to become a valued part of the community where over time our customers become friendly acquaintances, where they feel valued and cared for. We simply will not tolerate individuals who present a risk to our customers or undermine our business or the local area.

You may be aware that Para 2.1 of the Secretary of State's s182 Guidance on the Licensing Act states that "Licensing Authorities should look to the Police as the main source of advice on Crime & Disorder." The Police have not objected to this application. Similarly, the Licensing Authority - itself being the author, champion and guardian of the CIA and CIZ - also do not object to this application. Ms Rhea

VAGARWAL, the Licensing Enforcement Officer from Brent Council's Regulatory Services, suggested amendments to further strengthen the operating schedule - which we have been happy to accept in their entirety.

Summary

The Licensing Guys have worked closely with the applicant to craft the application with a range of measures and safeguards, detailed in the attached Operating Schedule. This demonstrates the importance we all place on being a good neighbour and maintaining high standards of operation. To re-iterate, these measures were included in our original application because we attribute as much importance as you do on operating considerately, thoughtfully, and responsibly.

If you have any questions or would like further clarification, we would be very happy to discuss it further as we hope very much that you will be one of our valued customers in future. Please feel free to contact (me) Nick SEMPER of The Licensing Guys on 07700 164448 or by email at nick@thelicensingguys.com.

We hope that this further information above reassures you that our business cares as much for our local area and community as you do and is highly unlikely to cause any negative impact on anyone.

If you are reassured and feel the information above removes the need to attend a hearing and present your concerns to the Licensing Sub-Committee we would ask you consider withdrawing your objection to the application and confirm this by email to Linda LEGISTER, the Licensing Applications Manager for Brent Council's Regulatory Services dealing with this application at the Licensing Authority - Linda.Legister@brent.gov.uk Linda is, of course, completely independent in this matter and will be able to advise you impartially on all the matters addressed in this correspondence.

Otherwise, I look forward to addressing your concerns at the forthcoming Licensing Sub Committee Hearing on 15th June 2026.

Yours sincerely,

Nick SEMPER
Director at The Licensing Guys