

Dear Licensing Team,

Re: The Lodge, Roe Green Park, Kingsbury, NW9 9HA Application No. 39409

I am writing as the Chair of Valley Farm Resident Association to formally object to the application for late-night refreshment at The Lodge, Roe Green Park, on Friday and Saturday evenings between 11:00 pm and midnight.

Our objections are made under the Licensing Act 2003 and relates principally to the licensing objective of **the prevention of public nuisance, together with relevant considerations concerning public safety.**

We ask the Council to take particular account of the premises' unusual and historic location at the historic entrance to Roe Green Park, its proximity to residential properties, its previous operational history and the potential consequences of permitting additional late-night activity. A visit to the site may help the subcommittee to see how unusual this site is for late hour refreshments.

1. The historic setting and sensitive location

Kingsbury Manor, its Lodge, former Coach House and surviving Walled Garden, now part of the Barnhill Conservation |Group, are all elements of the late-Victorian country estate established in 1899. The Lodge occupies an important position at the historic entrance to the Manor grounds, much of which now forms Roe Green Park.

The nearby Coach House also has historical significance through its association with John Logie Baird, who used it from 1928 as the Kingsbury Manor Studio for pioneering television experiments and has a commemorative plaque and a preserved base for one of the three transmitters masts used.

Together, the Manor, Lodge, Coach House, Walled Garden and surrounding parkland form a distinctive historic setting which contributes significantly to the character of the local area. The Lodge should therefore not be viewed simply as an isolated commercial premises on Kingsbury Road. It occupies a particularly sensitive position at the entrance to a public park, adjoining an established residential community.

While the historical importance of the site is not itself a licensing objective, the nature and location of the premises are directly relevant when considering the potential for public nuisance arising from late-night operation. Our concern is not with the responsible use of the building, but with the consequences of permitting additional activity until midnight in this particular environment.

2. Prevention of public nuisance

Our principal objection concerns the potential for increased noise and disturbance during the additional hour between 11:00 pm and midnight and the period immediately following the cessation of licensed activities.

The Lodge is not situated within an established late-night commercial area, which already has a cluster of well over 30 cafés, restaurants, take away food premises . It is located at the entrance to a public park, close to residential properties, where background noise levels would ordinarily be expected to reduce considerably during the late evening.

Allowing late-night refreshment until midnight creates the potential for customers arriving, remaining at and leaving the premises later into the night, together with associated vehicle movements, takeaway collections and activity outside the building.

Conversations and raised voices, car doors closing, engines running, taxis and private-hire vehicles collecting customers, and groups dispersing through adjoining residential streets could all contribute to additional disturbance.

A midnight finishing time does not mean that all activity will cease at midnight. Customers may remain outside while waiting for transport, vehicles may continue arriving and departing, and staff may remain on site to undertake closing activities.

Consequently, the practical effect of permitting late-night refreshment until midnight could be disturbance continuing beyond the licensed hours and will possibly attract those customers who previously frequented the location when its licence was withdrawn.

An additional hour late at night can have a substantially greater effect on neighbouring residents than an additional hour during the daytime. This is particularly relevant on Friday and Saturday evenings, when customers may remain in the vicinity later and residents should reasonably expect to enjoy their homes without unnecessary disturbance.

3. Brent Council's Statement of Licensing Policy

I would specifically draw the Council's attention to its Statement of Licensing Policy 2025–2030 and, in particular, Policy 10 concerning noise disturbance in residential areas. This policy expects applicants to give specific consideration to measures for reducing noise disturbance where premises are situated in residential or predominantly residential areas.

The Lodge's location within Roe Green Park, close to neighbouring homes, makes this policy particularly relevant. I would therefore ask the Licensing Sub-Committee to consider whether the applicant has demonstrated sufficient understanding of the particular characteristics of the location and whether adequate safeguards have been proposed to prevent public nuisance during the additional late-night hour.

Particular consideration should be given to noise management, customer dispersal, takeaway collections, vehicle movements and the prevention of customers congregating outside the premises.

The issue is not simply whether the building can remain open for an additional hour, but whether the activities associated with that additional hour can be adequately controlled without causing further disturbance to the surrounding residential community.

4. Public safety

I also ask the Council to consider any public safety implications arising from the particular location of the premises. Customers leaving at or after midnight may be dispersing through or around a public park and adjoining residential roads at a time when the surrounding area is relatively quiet.

The Council should be satisfied that suitable arrangements are in place for customers to leave safely, that pedestrian and vehicle movements can be adequately managed and that the proposed late-night operation will not create avoidable safety risks.

The unusual location of the Lodge warrants careful consideration of these matters.

5. Previous operational history and residents' experience

The concerns outlined above are heightened by the previous operational history of the premises.

The Lodge was historically part of the Manor House estate, following a lengthy period of vacancy, residents had understood that its redevelopment would provide a café or similar community/park focused facility appropriate to its surroundings. Residents were led to believe that the building would continue to become an attractive and beneficial addition to Roe Green Park.

Unfortunately, its subsequent use has caused considerable distress, anxiety, stress and frustration among local residents, over a number of years, blighting their lives.

Previous use of the premises resulted in complaints concerning late-night activity, noise and disturbance. The premises has also previously been the subject of licensing proceedings, and concerns involving the Police and Council have been raised.

These experiences have seriously damaged residents' confidence in the ability of restrictions and licence conditions to prevent a recurrence of the problems previously associated with the site. I recognise that the present application must be determined on its own merits and that previous conduct should not automatically be attributed to the current applicant.

Nevertheless, the previous history of disturbance and noncompliance at this particular location is relevant when assessing the risks associated with permitting further late-night activity. Residents' concerns are not simply hypothetical. They arise from their previous experience of the use of these premises and the devastating effect that late night activity has had upon the surrounding community.

Given this history, I respectfully ask the Council to examine what has materially changed and what specific measures the present applicant proposes to prevent similar problems arising that were not in place previously.

6. The need for adequate and enforceable safeguards

The previous history of the Lodge has also raised understandable concerns among residents about the effectiveness of restrictions and conditions imposed upon the premises. There have been longstanding concerns regarding the condition and alteration of this historically significant building and whether previous restrictions relating to the property have been respected.

Although planning matters must be considered separately from licensing, this wider history helps explain the loss of confidence experienced by residents.

In relation to the present application, the important question is whether any proposed licensing conditions would be sufficiently clear, practical and enforceable to prevent public nuisance.

I would ask the Sub-Committee to consider whether the applicant has provided adequate arrangements for managing noise, supervising the premises, controlling activity outside the building and ensuring that customers leave quietly.

In particular, consideration should be given to how any conditions would be monitored and enforced, especially during the final hour of operation and immediately after midnight. Residents should not be placed in a position where they must repeatedly report late-night disturbance before effective action is taken.

7. The additional late-night hour

The application seeks permission for late-night refreshment between 11:00 pm and midnight on Fridays and Saturdays.

My objection is directed specifically at this additional late-night period.

The potential consequences of permitting this activity must be assessed in the context of the premises' sensitive location, the quiet residential environment, the previous operational history and failure and the practical difficulties of controlling customer dispersal at this location.

In my view, the risks of further public nuisance during and after this additional hour have not been adequately addressed merely by proposing a midnight finishing time.

The Council should consider whether the applicant has demonstrated that the additional activity can be conducted consistently with the licensing objectives, particularly the prevention of public nuisance.

8. Requested decision and alternative safeguards

For the reasons set out above, I respectfully request that the Council refuse the application for late-night refreshment between 11:00 pm and midnight on Fridays and Saturdays.

If the Licensing Sub-Committee is nevertheless minded to grant the application, I ask that it consider imposing robust, specific and enforceable conditions addressing the following matters:

- A written noise-management and customer-dispersal policy, including arrangements to prevent customers congregating outside the premises.
- Appropriate supervision of the entrance and immediate surroundings during the final hour and at closing time.
- Restrictions on the use of any external seating or customer areas late at night, where appropriate.
- Measures to minimise disturbance from takeaway collections, vehicle movements and customers waiting for transport.
- Appropriate controls on late-night deliveries, waste handling and external lighting.
- Clear arrangements for residents to report disturbances and for the premises to respond promptly.
- Clear instructions and use of recorded CCTV and noise monitors and that the product must be kept and produced if requested for must be kept for 12 months.
- A strict requirement and enforced policy of NO Bring Your Own Bottle (BYO)

Any conditions should be capable of effective enforcement and designed to prevent a recurrence of noncompliance that led to action by police and council.

9. Conclusion

Roe Green Park is an important public open space, surrounded by an established residential community and containing a distinctive group of historic buildings.

The Lodge occupies a particularly prominent and sensitive position at the park entrance. Its operation should take proper account of the surrounding environment and the reasonable amenity of neighbouring residents.

This objection is not directed at the responsible use of the building or at an appropriate business operating from it. It concerns the specific proposal to permit late-night refreshment until midnight on Fridays and Saturdays and the potential consequences for the surrounding community.

In view of the premises' location, its previous operational history and the potential for further late-night disturbance, I ask the Council to refuse the application in the interests of promoting the licensing objective of preventing public nuisance, while also taking account of any relevant public safety considerations.

I would be grateful if you would acknowledge receipt of this objection, ensure that it is considered in determining the application and keep me informed of any hearing at which it will be considered.

Chair Valley Farm Residents Association