

2022/01970/LAPR
Margartita Mama's (Fresh Pizza)
149 North End Road
London
W14 9NH


Introduction

I am writing to you to object to the above licensing application. We are residents of a residential block in the immediate vicinity of 149 North End Road and are therefore very familiar with the business in question.

I note that the application has been made with a trading name of "Margartita Mama's". However, the trading name of the business at 149 North End Road ("the name above the door") is "Fresh Pizza". I also note that the license application refers to Margartita Mama's (note the misspelling), but Mr Eddris Hashimi's company has a slightly different spelling: Margarita Mama's Ltd (company number 12919018). I would therefore question whether the application has been made correctly – and whether the license (if granted) would be given to the correct business or legal entity. It is also possible that the incorrect trading name (and misspelling) may prevented local residents from raising objections in time as they may not have realised that this application applies to Fresh Pizza.

I would also like to highlight to the Licencing Committee (with some concern) that Fresh Pizza appears to be trading under multiple names on multiple delivery sites – this is a common practice for delivery-focused businesses including "dark kitchens" (for instance, to help them to operate beyond their licensed opening hours or conceal their actual number of delivery orders).

The following screenshots were taken today from Just Eat and show Fresh Pizza using the name "Fresh Gourmet Pizza" and/or "Gourmet Pizzeria" (see <https://www.just-eat.co.uk/restaurants-fresh-gourmet-pizza-west-kensington-w14/>). They also show the very late hours for delivery orders (which are the same for collection). On Google Maps, "Gourmet Pizzeria" likewise appears as a second business operating out of 149 North End Road, the same address as the current application.



Fresh Gourmet Pizza

Pizza • Italian

★★★★☆ [View 180 reviews](#)

149 North End Road, London, W14 9NH

Delivering now
[I want to collect](#)

£1.99 delivery fee
£10 min. order

Opening times

	Delivery	Collection
Monday	09:15 – 05:44	
Tuesday	09:15 – 06:44	
Wednesday	09:15 – 06:44	
Thursday	09:15 – 06:44	
Friday	09:15 – 06:44	
Saturday	09:15 – 06:44	
Sunday	09:15 – 06:44	

In my letter below, I will refer to the business in question as “Fresh Pizza” – as this is “the name above the door” and therefore the most recognisable.

My letter will also refer repeatedly to the LBHF “Statement of Licensing Policy 2022-2027”. For brevity, I will shorten this to “the SLP”.

History

On 27/9/22, I attended the licensing hearing for another nearby takeaway, Pizza Pronto (2022/01153/LAPR). During the hearing, the owners of Pizza Pronto made reference to Fresh Pizza, which they claimed was operating beyond its licensed hours and was open well past midnight without any licensing extension. Pizza Pronto were seeking to extend their own operating hours to have a "level playing field".

Shortly after this licensing hearing, I wrote my first email complaint (1/10/22) to the Licensing Team to ask them to investigate these alleged breaches by Fresh Pizza. A copy of this complaint is attached for ease of reference. At this time, Fresh Pizza did not have a late-night license, but appeared to be operating until 5am, both for collection and delivery. This was the allegation made by Pizza Pronto and was confirmed by the following image taken from the Fresh Pizza site (<https://freshpizzalondon.co.uk/contact-us>). My own observations confirmed that Fresh Pizza was open well past midnight for both collection and delivery.

Opening Hours

Day	Collection	Delivery
Monday	09:00 AM - 05:00 AM	09:00 AM - 05:00 AM
Tuesday	09:00 AM - 05:00 AM	09:00 AM - 05:00 AM
Wednesday	09:00 AM - 05:00 AM	09:00 AM - 05:00 AM
Thursday	09:00 AM - 05:00 AM	09:00 AM - 05:00 AM
Friday	09:00 AM - 05:00 AM	09:00 AM - 05:00 AM
Saturday	09:00 AM - 05:00 AM	09:00 AM - 05:00 AM
Sunday	09:00 AM - 05:00 AM	09:00 AM - 05:00 AM

Even if Fresh Pizza had an existing license for these hours, it seemed likely (from my own observations) that they were breaching the sort of conditions normally associated with a late-night license – such as those prohibiting counter service to walk-in customers and preventing delivery riders waiting outside where they might cause disruption to local residents.

As Fresh Pizza have made the current licensing application, I assume that the investigations by the Licensing Team identified breaches, upheld my complaint, and resulted in a formal warning.

On 24/12/22, I wrote my second email complaint to the Licensing Team regarding Fresh Pizza (a copy of this is also attached). During November and December, Fresh Pizza had been applied for (and apparently been granted) a number of TENs. However, I noticed that they were still open well past midnight on nights that they did not have a TEN – and hence in breach of their current licensing conditions regarding opening hours. I also raised some technical queries regarding the validity of the TENs and whether the applicants had exceeded the number of allowed days per year.

I understand that TENs are a slightly different licensing regime to the current application. However, my email of 24/12/22 was to complain that the behaviour of Fresh Pizza on days when they did not have a TEN in place as this appeared to breach their current licensing conditions (hours) – and as a result, I feel that this complaint is relevant and should be taken into consideration when considering the current application.

I feel that the behaviour highlighted in my email of 24/12/22 demonstrates that there are persistent and repeated licensing breaches by Fresh Pizza – which have occurred even after they were (I assume) warned about their behaviour following my email of 1/10/22. At this point, Fresh Pizza were fully aware of their licensing conditions (their TENs application demonstrates this), but seem to have chosen to ignore these conditions on the days when they don't have a valid TEN. This raises “red flags” regarding Fresh Pizza's current licensing application as it suggests a casual disregard towards the licensing regulations.

Summary

We encourage the licensing committee to reject the application from Fresh Pizza on the following statutory grounds.

- The prevention of public nuisance
- The prevention of crime and disorder

Our letter of objection will cover these points in more detail below. In doing this, we will highlight other significant issues including:

- The high concentration of fast-food takeaways and the cumulative impact that this is having on this high-density residential area.
- The previous trading practices of this business, which appears to include sustained and repeated licensing breaches.

The prevention of public nuisance

A late opening fast-food outlet will encourage loitering, crime and the consumption of alcohol in public spaces (streets and pavements) of this residential neighbourhood. The area already has a drug-dealing problem with North End Crescent (including the council properties and their grounds, surrounding alleyways and passages, and the area around the library) being an area where dealers and their clients congregate and meet up.

The provision of more late-night fast-food in this area will provide a magnet for drug-dealing and drug-buying. A late-night fast-food outlet will also encourage consumption of alcohol out on the street late at night, with associated anti-social behaviour (aggression and loud raucous behaviour, litter, urinating etc). Rough sleepers (already a problem in the ward) will be attracted to the area.

Fresh Pizza is situated in a high-density residential area that is already vulnerable to noise from existing outlets and shops. Whilst there may be a place for the “late-night economy”/“delivery economy” in city centres, it is inappropriate for a residential neighbourhood such as this. We would also like to flag the cumulative impact on this area which has a disproportionately high concentration of fast-food takeaways, many of which open late and offer delivery orders (this point will be covered in more detail later on).

Allowing Fresh Pizza to open late (particularly on Friday and at weekends) will dramatically increase the noise levels in the area as it will attract cars, motorbikes, scooters and groups of people to the locality. We object to this application treating Sunday as a suitable night for extended late-night activity as this noise would disrupt residents and their children who need to be at work and school on Mondays.

There is almost no waiting area inside Fresh Pizza – the counter extends almost to the doorway and there is only space inside for a couple of people. There are a couple of chairs placed in the street outside. As a result, customers (and delivery riders) awaiting their order will often loiter outside and this can cause a disturbance to local residents.

This issue will get worse when Olympia reopens and starts running concerts. These events may have over 4000+ people attending them and many will stop at Fresh Pizza on their way home (if it is allowed to open late) as it is on the way to West Kensington underground station. These customers may often be boisterous or drunk as they have just come out of a concert.

In addition, Fresh Pizza is situated very close to the North End Road/Talgarth Road junction – and as a result, does not have any suitable/safe parking for customers and delivery riders. Cars/bikes parked outside will obstruct traffic travelling to (or queueing at) the Talgarth Road junction (which is a strategic junction on a red route and an accident black spot). We have also noticed delivery riders for Fresh Pizza will often wait in the entrance of Gunterstone Road (just across from Fresh Pizza), rather than outside the takeaway itself. This is not an appropriate alternative as Gunterstone Road is a quiet residential street.

Although the overall number of delivery orders has grown, the number of riders has risen even more quickly and these riders are now competing more aggressively for orders. It is now common to see scores of delivery riders parked outside (or near to) takeaway restaurants so that they can be the first in line when an order comes in (the delivery matching software seems to prioritise riders who can collect the quickest which favours those loitering outside). These communities of waiting riders seem to develop their own social scene based on shared language, background, or circumstances.

I am concerned that extending the late-night opening for Fresh Pizza will lead to it becoming one of these “congregation spots” – and this is inappropriate in a quiet residential street as it will cause a substantial late-night disruption to local residents (particularly in Gunterstone Road and North End Road).

We have also seen a substantial increase in the number of delivery riders (both on mopeds and electric bikes) who are using Edith Villas as a shortcut to West Cromwell Road – they ride to the end of this cul de sac, then go up the kerb and over the pavement to reach Cromwell Road as this allows them to miss out the traffic light at the junction of North End Road.

The extension being requested by the applicant is excessive (too long and over too many days) and will cause substantial disruption to local residents. Moreover, it is inappropriate – particularly in a high-density residential area – for the current application to treat 02:00 as normal opening hours, rather than an exceptional late-night extension for the weekend (i.e. Friday/Saturday).

The Pizza Pronto license restricts its opening hours to 00:30 on Sunday to Wednesday and 01:00 on Thursday to Saturday. However, we regard even these hours as excessive as the SLP (pages 21-22) indicates that takeaways are “not considered appropriate” in a residential area and suggests a closing time of **00:30 on Friday/Saturday** and **23:30 on Sunday** for a takeaway in a mixed-use area.

As Fresh Pizza has been operating (for a sustained period) in breach of its licensed opening hours, we feel that it would be inappropriate for it to be granted an extension beyond these guidelines.

Given the concentration of fast-food takeaways in the local area, I am concerned that granting extended hours to Fresh Pizza would create a precedent and that other establishments in the area would want to follow suit. Regarding “precedents”, I feel that the Licensing Committee should not take the opening hours of other nearby fast-food takeaways into account when considering the current application.

This approach (using “precedent”) does not create a “level playing field” – but instead leads to a “race to the bottom” which is detrimental to local residents and the ward/borough in general as each will request (longer and longer) late-night extensions. It also leads to an over-concentration of late-night delivery services in certain areas (once one fast-food outlet has late-night opening, all of the others apply for the same, whereas another area can avoid it completely if they don’t grant the first late-night license).

Granting extended hours to most/all takeaways in an area also blights that neighbourhood. Fast-food takeaways “squeeze out” genuine eat-in/sit-down restaurants in the area as the takeaways are subsidised by their late-night delivery trade (which often forms the bulk of their profits). Unlike the eat-in restaurants, there is little or no incentive for the takeaways to be “good neighbours” as they don’t rely on local residents as walk-in trade (as their customers are scattered far and wide).

I will discuss the above points further in the section below under the heading “Cumulative Impact”.

I note that the current application does not include any of the conditions that have been applied to other fast-food takeaways in the area. For instance, it does not restrict service after 11pm to pre-booked delivery riders only (barring “walk-in” trade), prevent delivery riders from congregating outside or obstructing the pavement with the vehicles, or require the use of electric bikes only.

As a local resident, I object the licensing application as a whole. As Fresh Pizza has previously operated in breach of its licensing hours, I feel that no extension to these hours should be granted until it has demonstrated an extended period of “good behaviour” (and even then, it should not be granted automatically or by default, but only through a new licencing application which will allow further public comments/objections at that stage). However, if extended licensing hours are granted, it should include the sort of standard conditions listed in the above paragraph. I am sure that the Licensing Committee is familiar with the type of conditions which are appropriate – but if not, the ones from the Pizza Pronto license can be used as a starting point.

The prevention of crime and disorder

In assessing this issue of crime and disorder, the licensing committee should also consider the conduct of the business in question. The SLP (page 9) says that LBHF wants to “improve the local business community by enforcing against those businesses that don’t operate well, are breaking the law and do not contribute to making the borough safe and orderly”.

I believe that this aim is undermined if Fresh Pizza is granted a license that would allow extended opening hours. Fresh Pizza appears to have been opening beyond its licensed hours for a substantial period. Once warned, it applied for TENS but seemed to continue this behaviour and operate beyond its licensed hours on the days when it did not have a TENS in place. This appears (on the surface) to be a clear and self-evident sign that it is “breaking the law” and “not operating well”.

Page 39 of the SLP says that the Licensing Authority should consider:

xvi. The history of previous nuisance complaints proved against the premises, particularly where statutory notices have been served on the present licence holder;

xvii. The history of the applicant in controlling anti-social behaviour and preventing nuisance

By opening beyond their licensed hours, Fresh Pizza appear to have contravened these guidelines (and potentially others) and have demonstrated a disregard for their responsibility to prevent nuisance. In this, I assume that my 1/10/22 email to the Licensing Team about Fresh Pizza triggered an inspection and a statutory notice of the breach in opening hours.

Annex 4 of the SLP (page 52) indicates that one of the grounds for reviewing an existing premises licence is “frequently operating outside permitted hours”. Fresh Pizza appears to have been behaving in a way which would trigger a licensing review (and potentially the removal of an existing licence) – and as a result, it seems wholly inappropriate, given this same behaviour, for them to be granted a new license for extended hours.

The licensing committee should not grant a license to Fresh Pizza on the basis that they are now trying to comply with requirements. Any restaurant owner would be aware of the licensing requirements (or be able to find them out by visiting the LBHF site), but Fresh Pizza appeared to operate far beyond their allowed opening hours and did this for an extended period. This appears to have been a blatant and sustained breach of the licensing rules. They also appear to have knowingly breached the licensing rules by opening late on the days in December 2022 when they did not have a TEN in place.

In discussing Fresh Pizza’s business practices and standards, it seems useful and relevant to quote from their Google reviews – as several of these say that they “lie” to their customers and operate as a “scam”. I am not a customer of Fresh Pizza, so can’t verify these reviews. However, they do not give the impression that Fresh Pizza is a “good business” and “operating well”. The comments below are taken from these Google reviews.

“Please avoid this restaurant if you don’t want to waste your money. They’re also called MARGARITA MAMA’S on Deliveroo (same address in North End Road) and they take the money but don’t deliver your order. They are extremely rude on the phone and they lie to Deliveroo by saying that the order was delivered. Customer service is awful & Deliveroo will refuse to refund you because they say that this company do they own delivery so they can’t prove if it was delivered or not. Be careful!!!”

“Never felt compelled to leave a review before, but the service was honestly unbelievable. Ordered via Deliveroo and waited 2 hours, despite the order having a 10 minute delivery estimate. Called the restaurant numerous times, each time they were incredibly rude and lied, claiming it would only be a few more minutes.

Eventually they just hung up on me and marked it as delivered, despite it never having actually arrived. I tried to get a refund or cancel the order but was unable to as the restaurant listed it as delivered.

Looking at other reviews, seems this place is a total scam. Please avoid and save your money!”

Overall, I feel that the current licensing application should be refused and Fresh Pizza should be restricted to standard opening hours with no late-night extension. Granting an extension without a period of good behaviour would be premature as Fresh Pizza needs to prove that it can operate well, in a safe and orderly fashion, without breaching their licencing conditions. As a local resident, I feel that Fresh Pizza can only do this by showing – for an extended period of time – that it is willing to keep to restricted licensing hours. It is only at that point, when it has rebuilt the trust of the local community and the Licensing Committee, that Fresh Pizza should be allowed to request extended opening (which would need to go through the same public consultation process).

Cumulative impact

I would like to also highlight the cumulative impact of fast-food takeaways in this area (particularly in terms of public nuisance and crime and disorder) – and would encourage the licensing committee to take this into consideration when considering my objections.

The SLP lists (on page 8) “a sustainable, well-run licensed sector” as one of its three key themes. However, I feel that this sustainability can be undermined (at a local/street level) if there is an overemphasis on one type of business (particularly fast-food takeaways/deliveries).

This area (close to West Kensington station, north of Talgarth Road) is a residential area, but has an extremely high concentration of fast-food takeaways – with many of these offering late-night service or late-night delivery. For instance, there are two other pizza takeaways (Pizza Pronto and Domino’s) within 150m of Fresh Pizza – and three additional ones (Venice Pizzeria, Maurizio Barca, and Casa Bardotti) in a slightly larger radius. There are also two fried chicken takeaways (Chicken Cottage and Chicken Shack) and three kebab takeaways (Rihan Valley, Best Mangal, Best Mangal 1996) in a similar area. Dominos, Pizza Pronto, Fresh Pizza and Venice Pizza rely solely/primarily on delivery trade and have no eat-in facilities.

The cumulative effect of these takeaways (and the late-night “delivery economy” as a whole) is having a detrimental effect on this residential neighbourhood. In addition to the fast-food takeaways mentioned above, we also have a number of other delivery businesses. The Sainsbury’s Local does a very large volume of delivery trade – the delivery orders are almost non-stop and it is rare to be in the shop without a delivery order being assembled/collected at the same time.

There is also a Gorillas distribution hub planned in the nearby Challoner Crescent. Their planning application (2022/03031/CLE) is currently pending consideration) but specifies parking for 13 motorcycles. This should give a good indication of the volume of business which will be operated out of this location.

In addition to this, we have a number of delivery business being operated out of purely residential properties. For instance, a glance at Google Maps suggests that there may also be a 24-hour pharmacy delivery service and a 24-hour wine/alcohol delivery service based in Matheson Road.

The foreword to the SLP mentions (page 3) creating a “a diverse, vibrant and safe night-time economy” night-time economy and goes on to say “[w]e want to make H&F an even more attractive place to live, work and visit; so that restaurants, cafes, bars and other licensed hospitality premises can profit”. On page 4, it says “[w]e believe the policy strikes a balance between providing an environment within which responsible business operators can succeed and contribute towards a

vibrant business and thriving night-time economy in a sustainable way - promoting economic growth whilst protecting residential amenity”.

Having a residential area with an excessively high concentration of delivery-focused fast-food takeaways seems incompatible with this aim of promoting a diverse and sustainable hospitality sector (a varied mix of thriving local businesses). It likewise seems incompatible with the aim of protecting residential amenities or nurturing local communities.

To ensure a vibrant and sustainable local environment, the Licensing Committee needs to consider the mix of restaurants in an area (particularly the number of delivery-oriented fast-food takeaways in relation to the number of sit-down restaurants), not just the number of restaurants compared to other types of business.

It is the sit-down restaurants which contribute most to creating a vibrant local community (and to local employment), but these can be “squeezed out” of a neighbourhood by fast-food takeaways. The pandemic had a great impact on the hospitality sector, but it affected these sit-down restaurants the most – fast-food takeaways and delivery services thrived. As a result, it is these sit-down restaurants which now need the most support.

If a takeaway claims that it can only survive by taking late-night delivery orders, then this is an indication that the area is already over-saturated with similar takeaway businesses. The Licensing Committee should not extend their hours simply to support an otherwise unsustainable business – this does not contribute to “business resilience” or an overall “robust and thriving cultural and leisure sector” (SLP page 7).

Viability and accountability of business

A cursory search of Companies House suggests that there has been a “revolving door” of ownership/insolvency at Fresh Pizza and this does not bode well for the sustainability of the business or the transparency and accountability of its management.

Eddris Hashimi was a director of Basil Fresh Pizza Ltd (12488946) until 28/7/21 and retained a significant control until 29/10/21. This also went into voluntary insolvency in March 2022 and its statement of affairs on 8/4/22 showed liabilities of £61K (mainly to HMRC and Lloyds Bank).

Fresh Pizza on Demand Ltd (12366489) was registered at 149 North End Road and its sole director was Eddris Hashimi. This company also went into voluntary insolvency on 14/3/22.

Other behaviour also seems odd. De Milano London Ltd. (14458698) was incorporated on 2/11/22 with Eddris Hashimi as a director, but the next day, he ceased to be director and was replaced by Nasrullah Arbabzada who is also the sole director of Pizza Mama’s (13737110). Likewise, Margarita Mama’s Ltd (12919018) was incorporated on 1/10/20 with Eddris Hashimi as sole director. Companies House lists him being terminated as director on 21/11/22 and reappointed the same day (though the reappointment was on file on 29/11/22).

The connections between Basil Fresh Pizza, Fresh Pizza on Demand, Pizza Mama’s, De Milano London and Margarita Mama’s are unclear (particularly as most share the same registered offices) – and I am concerned by the insolvencies and levels of debt. Their relationship to Fresh Pizza is equally opaque. The same applies to their relationship to Fresh Gourmet Pizza and Gourmet Pizzeria (the names mentioned on Just Eat).

There is no explanation for the high turnover of ownership and companies for what is apparently a small and straightforward pizza takeaway. It is also unclear why the ownership of this takeaway has changed so frequently, but this is something that the licencing committee may wish to look into - or take into consideration when making their decision about the current application.

For instance, it is hard to see who currently has the beneficial ownership of Fresh Pizza or is ultimately responsible for business matters (including licensing issues and debts). I am also concerned that the licence application may have been made in the name of one business – and, once granted, will be transferred to another company/individual with no track record in this local area.

Andrew Clarke and Grethe Mitchell
West Kensington Court
Edith Villas
London
W14 9AB

2022/01970/LAPR
Margartita Mama's (Fresh Pizza)
149 North End Road
London
W14 9NH

Email complaint sent to Licensing Team 1/10/22

On 27/9/22, I attended the licensing hearing regarding Pizza Pronto (2022/01153/LAPR). During the hearing, the owners of Pizza Pronto made reference to Fresh Pizza, another local pizza takeaway/delivery service, which they claimed was operating beyond its licensing hours. Pizza Pronto were using this to justify their own licensing application - seeking to extend their own operating hours to have a "level playing field".

As there is an alleged licensing breach, I would be grateful if you could check the licensing hours/conditions for Fresh Pizza and take steps to ensure that it complies fully with these.

As far as I can tell (from searching your site), Fresh Pizza does not have any late night license, but their own site says that it operates until 5am, both for collection and delivery (this was also the allegation made by Pizza Pronto). The following is taken from their site (<https://freshpizzalondon.co.uk/contact-us>).

Even if they have a license, it is likely that they would be breaching conditions regarding counter service to walk-in customers, waiting of delivery riders, etc.

Opening Hours

Day	Collection	Delivery
Monday	09:00 AM - 05:00 AM	09:00 AM - 05:00 AM
Tuesday	09:00 AM - 05:00 AM	09:00 AM - 05:00 AM
Wednesday	09:00 AM - 05:00 AM	09:00 AM - 05:00 AM
Thursday	09:00 AM - 05:00 AM	09:00 AM - 05:00 AM
Friday	09:00 AM - 05:00 AM	09:00 AM - 05:00 AM
Saturday	09:00 AM - 05:00 AM	09:00 AM - 05:00 AM
Sunday	09:00 AM - 05:00 AM	09:00 AM - 05:00 AM

Regards,
Andy Clarke

2022/01970/LAPR
Margartita Mama's (Fresh Pizza)
149 North End Road
London
W14 9NH

Email complaint sent to Licensing Team 24/12/22

I am writing to complain about Fresh Pizza (149 North End Road London W14 9NH) as this business appears to still be opening late in breach of its current licensing terms (which do not have any late-night extension).

I would be grateful if you could investigate this current licensing breach (opening hours) and bring it to the attention of the Licensing Committee when they consider the current licensing application for Fresh Pizza (2022/01970/LAPR).

I walked past Fresh Pizza at around 00:30 on 24/12/22 and was surprised to find it still open and serving delivery orders (to multiple riders). This is not an isolated incident as I also saw it open at around 01:00 on 20/12/22. On that occasion, I saw it offering counter service to walk-in customers as well as delivery. Fresh Pizza have recently applied for three TENS (each for seven days) but the dates above (20/12/22 and 24/12/22) are not covered by any of these TENS.

This is the second time that I have written to you to complain about Fresh Pizza breaking its licensing conditions. I previously contacted you on 1/10/22 to inform you that it was opening late (for both delivery and collection). You responded to say that you were investigating this breach. I assume that this investigation resulted in a formal warning as Fresh Pizza are currently making a licensing application (2022/01970/LAPR).

There also appears to be some irregularities with the TENS for Fresh Pizza. As I understand it, there needs to be 24 hour gap between consecutive TENS (see <https://www.gov.uk/temporary-events-notice>). However, this didn't seem to be the case with their TEN application for 7/12/22 to 13/12/22.

The dates of their TENS are as follows:

- 16/11/22 to 22/11/22
- 30/11/22 to 6/12/22
- 7/12/22 to 13/12/22

They requested late night opening until 02:00 on 6/12/22 (which actually means until 02:00 on 7/12/22) and from 23:00 on 7/12/22. Hence there is less than 24 hours gap between the two TENS as one ends at 02:00 and the next starts at 23:00 the same day. I believe that this would make their TEN for 7/12/22 to 13/12/22 invalid (and their late-night opening for this week in breach).

In addition, your site (<https://www.lbhf.gov.uk/business/licensing/guidance-applicants-and-businesses/temporary-event-notices>) says that "events which extend after midnight will count as two days". Their three TENS are each for seven days and on each of these days, the extension is past midnight.

As I understand it, this would count as 42 days (3 TENS x 7 days x 2 as extending past midnight = 42 days) and hence exceed the 26 day per year limit. Even if their 7/12/22 TEN application was invalid, they would still exceed the 26 day limit (2 TENS x 7 days x 2 = 28 days).

Please let me know if my understanding of the TENS regulations (as it applies here) is incorrect.

Regards,

Andy Clarke