From: Jon Wallsgrove
Sent: Monday, February 19, 2024 11:40 AM
To: Mckenna Lorna: H&F <Lorna.Mckenna@lbhf.gov.uk>
Subject: Parsons Nursery and Jesses House

Dear Lorna

Further to the hearings for the above two applications please find attached written representations and a presentation brochure to provide the Licensing sub-committee with a bit more information. I have combined the written representations to avoid duplication as the majority of what is written would apply equally to both.

Regards

Jon Wallsgrove Partner

Parsons House and Jesse's house

SUBMISSIONS OF THE APPLICANT

- 1. We acknowledge that each of the applications must be dealt with on their own individual merits but for expediency we submit these representations for the Licensing subcommittee to consider as most of the points made relate to both applications.
- 2. The applications are for the grant of a premises licence in respect of Parsons House Nursery, 11 Heathman's Road, London and Jesse's House, 8-10 Heathman's Road. The details of the licensable activities and hours being applied in respect of Parson's House Nursery are set out at paragraph 1.1 of Page 4 of the Agenda and at paragraph 1.1 on Page 74 for Jesse's House.
- **3.** The Little Houses Group sought pre-application advice and met with the Licensing Officer, Police Licensing Officer and Environmental Health Officer on site during the building works. All spoke very positively about the development.
- 4. They currently operate a "mirror" business at Jaego's House, 557 Harrow Road, London which provides the same facilities as proposed at these two locations. It is positioned closer to residential properties that Parsons Nursery and in fact has an Apartment as its immediate neighbour. There has not been any complaints of any nature since opening. It too is licensed for the same hours and activities across it's member club facilities and nursery building.
- **5.** We invite the Councillors to read the letter sent by this firm to residents dated the 5th January which sets out some information regarding the use of these facilities and the correlation of the licensable activities applied for. In addition we also invite the Councillors to read the appended document which hopefully assists with some visuals on what the premises will look like.
- 6. Please note however, that the offer to amend the application within the letter to the interested parties is withdrawn. That offer was made specifically with a view to avoiding the delay and expense of a committee hearing. For the reasons set out in this representation there is no basis on which an application for the activities and hours originally applied for should not be granted by the Licensing sub-committee.
- **7.** There are 2 representations from interested persons but notably none from any of the Responsible Authorities.
- **8.** It is a source of considerable frustration that the 2 interested parties have failed to engage with the Applicant, despite the offer to meet and discuss their concerns further. It was evident in their representation that they had misunderstood what was being proposed.
- **9.** The sale and consumption of alcohol on the premises is very much an ancillary part of the "offer" in both premises. In the Nursery it will only be very occasionally at a children's party and in the café again infrequently given the principle purpose of those

premises is as a family members club with a health focus. This not based on simple projections but the experience of operating at their first venue, Jaego's House.

- 10. The Secretary of State's Guidance issued under section 182 Licensing Act states that licensing authorities should look to the Police as the main source of advice on crime and disorder (para 2.1). Further para 9.12 of that guidance states: "each responsible authority will be an expert in their respective field and in some cases, it is likely that a particular responsible authority will be the main source of advice in relation to a particular licensing objective." The interested parties raise the issue of public nuisance and of course your own Environmental Health Officer would be the appropriate expert to refer to on such matters.
- **11.** We would therefore respectfully invite the Sub-Committee to attach considerable weight to that fact, not least given there is no other tangible evidence put forward by the 2 Interested Parties which outweighs or contradicts the views of those experts. Indeed, the representations are, in this respectful submission, nothing more than an expression of fear of what might happen but without any credible foundation for having that fear, given the nature and character of the premises and the complete lack of engagement to discuss their concerns.
- **12.** The conditions offered in the application follow the pre-application advice received and are appropriate and proportionate in reassuring the Sub-Committee the licensing objectives will be promoted. The conditions are very similar to the premises licence in place for Jaego's House, which is a "tried and tested" premises, albeit we accept in a different location.
- 13. The Sub-Committee are invited to consider these conditions alongside the nature and character of the premises and the clientele that the premises will attract. The sale of alcohol at Parson's House Nursery is only intended to take place when parents book the venue for their children's party and they wish to provide a glass of wine or beer to the parents. The "off sale" requirement is to allow those parents to take home the remaining unconsumed alcohol. This must be preferable to the alternative which is people feeling as though they have to consume all the alcohol at the end of the party because they have paid for it.
- 14. Likewise, the sale of alcohol in Jesse's House is very much ancillary to the main purpose of the building. It will be sold in the restaurant and again may include private functions or conferences in the other available rooms. Similarly, the off sale provision is only intended to allow someone who has purchased a bottle of wine and has not finished it to be permitted to take it home with them.
- **15.** It is a unique premises which must be considered in that context rather than simply viewing it as a premises which sells alcohol. Entirely different considerations must, in our respectful view, be in play than if we were applying for a premises licence for say a bar.
- **16.** In our respectful submission there can be no concern for showing Films in either premise. In the nursery this is only intended to show age-appropriate recorded programmes and films whilst children are attending nursery. It is not intended to

operate "cinema" style. In Jesse's House, there is a dedicated room for families (members of course) to relax in and watch films. Again, it is not akin to going to the cinema.

- **17.** In relation to regulated entertainment in Jesse's House it is most likely that it is not even needed given the music that is going to be played will be accompanying fitness classes and accordingly could be argued to be incidental and not regulated. Our client, however, has taken the responsible position of including it on the premises licence to avoid any potential "grey area."
- 18. In the unlikely event the Sub-Committee has any outstanding concerns, rather than going on to refuse the application, I respectfully invite you to consider whether those concerns can be resolved by imposing other conditions to address those concerns. Were you minded to impose other conditions, we would welcome the opportunity to discuss those prior to the decision being announced.
- **19.** There is no assertion by either interested party that the applicant is not "fit and proper" nor that the establishment would not be well managed. Their comments appear to have no credible evidential basis and respectfully we invite the Committee to conclude they are no more than expression of their opinion, a fear of what might happen. We also invite the Committee to accept they are not linked to the licensable activity and are more general, in wanting to control the opening hours due to potential noise or light pollution. Those are matters for the Planning Authority.
- **20.** Were the licence to be refused these two premises would still operate and the concerns of noise, light pollution, parking would still exist for the interested parties. Their only assertion directly linked to the licensable activities is drunken behaviour but that cannot be taken seriously in light of matters set out within these representations.
- **21.** In any event is incumbent on the Committee to attach the greatest weight to the expert opinions of the responsible authorities, none of whom object to this application.

Conclusion

22. The Licensing Act 2003 was intended to be a permissive Act. To allow responsible operators to flourish and to be prohibitive or restrictive to those who were not. The protection the Government introduced in the Act to promote that underlying principle was the ability for anyone to review a premises licence at any time. It is a quick and easy remedy for interested parties and responsible authorities to get a Sub-Committee to review a decision to grant a licence. It is on such an application that evidence can be tested properly of the impact of the premises, rather than the position we have here, which is an expression of fear of what might happen.

23. Given that:

- i) planning permission has been granted for these premises to be used as described
- ii) no Responsible Authority has made a representation.

- iii) no credible evidence has been adduced by the interested parties.
- iv) the interested parties failed to engage in the process.
- v) All licensable activities are an ancillary part of the reason why someone would go to either premises.

And

vi) the conditions proposed are both proportionate and appropriate.

we invite the Committee to grant the application in original terms set out in the Licensing Officers report without further amendment or additional conditions.

Jon Wallsgrove

John Gaunt & Partners

Solicitors for the Applicant

FTLE HOUSES GROUP

Family Clubs & Ofsted Registered Nurseries With A Purpose





Little Houses Group are a collection of accessible and inclusive family member's clubs and Ofsted registered nurseries.

Our family clubs are spaces where kids can be kids in all their messy and noisy glory, and where grown ups can work, workout, and unwind.

Our family-focused nurseries represent the pinnacle of Early Years Education, a place where children can develop and grow with the help of our passionate team of educators.

An Introduction From Our Founder

The idea for Little Houses Group came to me in 2019, when I was with my first son Jaego in a pretty rubbish soft play in Notting Hill. There were crisps and coffee all over the mats, it was filthy, lacking in atmosphere and thoroughly unenjoyable for me...the parent!

At the time Jaego was 8 months old and I was mid running Incipio Group. I was often on childcare duty in the afternoons whilst my wife worked, and we didn't have regular childcare. So I was always on the lookout for kid friendly activities to keep him entertained.

I became quickly amazed and disappointed at the quantity and quality that was on offer in one of the world's leading cities! There was very little available that served the purpose for both Jaego AND myself. After a huge amount of research and exploring, it was very obvious that there was a gap in the market, and I wanted to build something that suited both the child and the adult equally.

Fast forward 10 months and I stepped down from Incipio's day-to-day to start Little Houses Group

Over 18-month I spoke to around 300 parents to gather feedback and research, and what you see today is the sum of that work. This is I why I truly believe we have struck a chord with parents; we really are creating a new space they didn't know they needed until now. I know first hand what it's like to juggle life and work with three young kids, so value and convenience are very important to me. What we're building must be a necessity and not a luxury. Here, you can drop your kids off at nursery and then head next door to our clubs, where with just one cost effective membership, we cover gym, co-work, design led living spaces, treatment rooms, crèche, cinema, fitness classes, kids classes, and more. Jaego's House and Kensal House Nursery were the first on the block, opening in November 2022. Jesse's House and Parsons House Nursery are coming in Spring and January 2024 respectively, and we're already working on our third location for Orly's House and Nursery for 2025.

Charlie Gardiner Founder, Little Houses Group





Our Aim

To build a high quality collection of community led spaces that make a difference in family life through support, education, and enjoyment. **Our Experienced Senior Leadership Team**



Charlie Gardiner FOUNDER



Sam Wignell



Rosie Moss PROPERTY HEAD OF





CLUBS



MANAGING DIRECTOR,











Jo Barrett CHIEF FINANCIAL OFFICER



Samantha Danison DIRECTOR OF

Hannah Cheston

Victoria Fellowes

HEAD OF

HEAD OF

EDUCATION

MEMBERSHIP

MARKETING





Our Clubs

Where grown ups can find space to breath and work, workout, and unwind. Beautifully designed and thought through spaces, created by parents, for parents.







are a home from home for young children. Tick every box imaginable for parents and

Little House Nurseries provides an excellent foundation on which every child can begin and build upon their learning journey. They learn within a secure, nurturing and stimulating environment where they feel included, valued and safe. Through a programme of learning, underpinned by warm and respectful relationships, our experienced Nursery teams celebrate the cultures, interests and abilities of each individual child.

The Nurseries inspire our children to be curious, adventurous, imaginative, and creative developing lifelong love of learning. We achieve this by tailoring our curriculum to the individual needs of our children.

Each room designed for specific age groups and named after birds.

Four Key Values: Kindness, Independence, Individuality, and Fun. Daily outdoor play in the nursery's outdoor garden.

Children enjoy freshly prepared food and snacks, in partnership with Lune & Wild. Children receive freshly prepared food and snacks, in partnership with Lune & Wild.





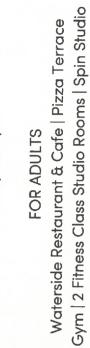
557 HARROW ROAD, LONDON W10 4RH **Opened November 2022**



20,000 sq. ft. & 1,200 member capacity

FOR KIDS

Creche & Kids Club | Outdoor Playground | Kids' Cinema Jungle Gym & Soft Play | 3 Kids Class Studio Rooms Holiday Camps



Living Room & Snug | Study & Co-Workspace



Situated in a Grade II listed building Ofsted registered 6 nursery rooms separated by age Includes an outdoor play area Separate nursery kitchen and food prep space

xxxxx sq. ft. & xxxx capacity





KENSAL HOUSE NURSERY

Opened September 2022

557 HARROW ROAD, LONDON W10 4RH







ability to find everything for my from home! It's so easy to stay has been missed and I can say things on offer. Not one detail What a special place that has already changed my life (and children under one roof rather than trawl the internet to find It really is like a home away child endless entertainment, around as well as give your with an amazing variety of here all day and just potter without hesitation there is nothing like this that exists. things to do with them).

~ Jess, Bertie, Albie (4), Felix (3), & Mara (0)

and a 1-year-old, the Club has become the supportive village As a mum to a 4-year-old

I never knew I needed.

enough. A haven of safety with tids and an invaluable support I can't recommend this place a nurturing environment for in my parenting journey.

Sophia (4), & Issa (1) ~ Rana, Sherif,

roof...there's always something It has all our needs under one for us to do. The kids love the soft play, and all the classes on offer.

has been invaluable, the gym and fitness classes help keep me motivated throughout the Having a workspace locally day.

It really has been a lifesaver for us, particularly over the ~ Jade, Kyle, Taylor (4), â colder months. Louie (2)

significant, positive difference Jaego's House has made a to our quality of life.

which has so many activities easier for us as new parents. on offer, makes it so much comfortable environment, Having a welcoming and

~ Andy, Samira, & Isaac

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There is no shortage of things eeling energised, it's time for spin, or if I feel like nestling in, an Oolong tea accompanied whatever your mood. If I'm with jazz music in the Living Room is always the ticket. 'WFH' never felt so good! to do at Jaego's House,

~ Emily, Sam, & Aria (1)



amazing addition to mine and them in very safe hands at the my children's lives. I'm able to Jaego's House has been an Kids' Club, which they love!

go to spin classes and leave

The Living Room is so

~ Gabi, Oscar, Elena (2),

& Raphael (8)

Excellent food, coffee and wine

play doesn't get boring for the cids. The whole place feels like spend time and the large soft welcoming and relaxing and full of great toys for the kids. makes it a place I want to

a second home for us.

Hear it direct from

5

1

~ Nicola, Simon, Finlay (4),

& Kit (2)

our families...

I look after my son full time and having to go from one playgroup to another library to city was exhausting. It left very classes scattered all over the little energy for the actual joy of parenting.

By the time my daughter was born, Jaego's had opened its experience of mothering was doors and the whole transformed.

welcoming and helpful, with a whose 2, or my husband and I. family...it's hard most days to eldest whose 8, my daughter organised around the whole tell who enjoys it more - my space that is so thoughtfully I have a place I can go to where everyone is kind,