

Mr Kamaljit Jandu
London Borough of Newham
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Our Ref: dd/lb/NIC1-13

Your Ref:

17th May 2016

Kamaljit.Jandu@onesource.co.uk

Dear Sirs,

Re: Circuit, 36-38 North Street, Romford, RM1 1BH
Expedited Review

We write with reference to the above and further to your email of today's date.

As you will be aware there is nothing in the legislation that prohibits the premise licence holder seeking a further interim steps hearing. The reason why we are seeking an additional interim steps hearing is two-fold. One, to make further submissions on fact and law, and two, to introduce additional supporting evidence on behalf of the premise licence holder.

As you will be aware Dadds LLP made submissions before the licensing sub-committee which were curtailed in part because of the discussions had by the police service prior to the hearing. You will note within your Minutes that our Mr Dadds did set out that he had prepared submissions but had changed them given the agreement that had been reached by the police service. Therefore, the submissions made were summarised and only the salient points came out through questioning and comments made by members during the police submission.

It is not unusual for submissions to be summarised or curtailed so as to focus on the matters at hand. As you are aware the police, who were the applicant to the review, and the premise licence holder both agreed what conditions would need to be in place so as to promote the licensing objectives in the interim. It would be somewhat unusual to make further submissions on matters outside of that given the agreed position. Of course the licensing authority did not agree with those conditions and made some observations regarding the premises licence conditions, alleged drug taking and comment further about the seriousness of the incident. Our client wishes to make further submissions regarding those points, particularly in relation to the drugs as that was the first time that matter had been raised, secondly in relation to the cameras and has additional conditions to offer. Further evidence is available and witness statements can be provided this afternoon.

Dadds Solicitors

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In relation to the seriousness of the incident and whether the conditions are appropriate, our expert is compiling a further report to comment upon that, and that evidence we wish to adduce before a licensing sub-committee. Our client also has supporting evidence from Pubwatch and further information from the Door Company which will assist the licensing authority.

With the above additional information and submissions, we are confident that the licensing authority will agree with us that interim steps can be modified.

We anticipate to have the additional documents over by early afternoon so that they can be circulated in good time for members to read them overnight. We have spoken to Mr Rankin yesterday and will ensure he also receives the additional papers.

Should you require any further information please do not hesitate to ask.

Yours faithfully



DADDS LLP