



3 St. Mary's Parsonage  
Manchester  
M3 2RD  
t: 0161 832 3434  
f: 0161 832 6650  
www.kuits.com  
DX 14325 Manchester 1

Dept Direct t: 0161 838 7888  
Dept Direct f: 0161 838 8110  
email: rebeccaingram@kuits.com

Licensing Service  
Blackpool Council  
Municipal Buildings  
Corporation Street  
Blackpool  
FY1 1NF

RLI.RLI.DAV645.1

29 June 2021

Dear Sirs

**SEV Licence Application – Dreams, 11 – 13 Queen Street, Blackpool**  
**Objection**

We write on behalf of Mr David Moseley, the landlord of the premises in which the SEV Eden One is located, 15-17 Queen Street.

We write to object to the above SEV licence application made by Mark Newton/AA Recreation 1 Ltd for 11-13 Queen Street. The Council will be aware that the consultation period in respect of this application has expired, but that in respect of SEV applications, late representations are admissible.

The premises is currently not licensed as an SEV and would therefore be a 5<sup>th</sup> SEV in Blackpool, and therefore in contravention of Blackpool Council's Statement of Licensing Policy. Mr Newton offers in the application made to relinquish a licence that his company currently holds for 15-17 Queen Street, Blackpool (Mr Moseley's property) should this licence be granted.

Mr Newton made this statement despite the fact that his status as holder of this licence is contested by our client. Whilst a transfer application made on behalf of our client in respect of this licence has recently been refused, our client intends to challenge this decision and therefore Mr Newton cannot make this statement with any degree of certainty.

As such, any decision to grant on the basis that the licence for 15-17 Queen Street will be surrendered would not be safe.

Furthermore, and in any case, we would object to Mr Newton being granted a new SEV under any circumstances.

We would submit that Mr Newton is unsuitable to hold such a licence, on the basis of the poor quality nature of his existing operations in the town. Mr Newton's honesty and integrity can also be questioned as a result of his dealings with our client and his holding to ransom an existing licence for a premises in respect of which he has no legal interest whatsoever.

Mr Newton has also expressed (during the hearing in respect of the transfer of the SEV Licence for Mr Moseley's property on 22<sup>nd</sup> June 2021) that it was his intention to 'take' all SEV licences in Blackpool, leaving none for any 'competition'.

This is concerning in respect of standards, quality and competition in Blackpool – such a monopoly benefitting no-one but Mr Newton himself.

Please advise as to when this matter will be before the Council's Licensing Committee.

Yours faithfully

**Kuit Steinart Levy LLP**