



**METROPOLITAN
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TERRITORIAL POLICING

Brent Police Licensing Unit

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Our ref: 01QK//17/157

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Date: 11th October 2017

Police representation to the Premises Licence application for Costcutter, 49 Burnt Oak Broadway, HA8 5JZ

I certify that I have considered the application shown above and I wish to make **representations** that the likely effect of the grant of the application is detrimental to the Council's Licensing Objectives for the reasons indicated below.

I am of the opinion that the risk to the Council's objectives can be mitigated by removing the requested variations or attaching conditions to the Licence as shown below.

Officer: **Nicola McDonald**
Licensing Constable PC 157QK

An officer of the Metropolitan Police, in whose area the premises are situated, who is authorised for the purposes of exercising its statutory function as a 'Responsible Authority' under the Licensing Act 2003.

The application has been made for a premises licence under section 17 of the act.

The Police representations are primarily concerned with crime and disorder.

I made a visit to the premises at 1340 hours on Wednesday 11th October 2017, the premises were open to the public and a large amount of alcohol was on display for sale. There was part A of a premises licence number 174475 displayed high behind the serving counter indicating Mr Abdul Malik was the designated premises supervisor, the premises on that licence was named as Sparks.

I was able to select a bottle of wine from an open chiller cabinet along the back wall next to the serving counter. In possession of the bottle of alcohol I was able to wander to the far side of the premises that has been divided in to separate small sublet independent businesses/units, one was selling soft furnishings and one suitcases. I then returned to the serving counter and as I placed the bottle of alcohol on the counter the lone member of staff behind produced a black plastic bag and was about to place the wine in it until I introduced myself and asked to speak to Mr Malik or Mr Salem. The lone member of staff gave his name as Yakub Doulatzai, he was not the owner of a personal licence. Neither Mr Salem or Mr Malik were available so I obtained a mobile phone number for him. **The applicants need to provide an alternative shop design to contain alcohol within the premises as per the legislation, that is approved by the licensing authority**

The structure and layout of this premise has changed vastly since the initial premises licence was granted in 2013, hence this new premises licence application. It is a breach of licensing legislation: Section 136 Licensing Act 2003, **namely conducting licensable activities without authority, which carries a fine of up to £20,000 and/or up to 6 months imprisonment.**

During my time in the vicinity of the shop on 11th October, I saw several small groups of street drinkers, all were white males speaking in Eastern European languages wearing workmen clothes. In particular I saw three standing near the betting shop, holding black plastic bags half of it covering cans of Special brew and Holstein Pills. One of the males was wearing a high visibility coat and verbally loud shouting at the others.

High Strength Alcoholic Drinks

Street drinkers and drunkenness is a major cause for concern in the vicinity of the shop. Resources and effort has been applied to this area of Burnt Oak in recent years as the demographic has changed. There has been an increase in migrants and rough sleepers loitering and street drinking. They show resistance to help from outreach workers. If the premise does not stock these high strength, cheap beers, lagers and ciders (above 6.0% ABV) then the problem will be lessened or displaced.

Hours for sale of Alcohol

This shop is located in an area for alcohol fuelled crime and anti social behaviour. The problems stem from habitual street drinkers and rough sleepers. Emergency services and local authorities have worked in partnership with other agencies to rectify the issues in the area but these people refuse to accept assistance. Their constant intake of alcohol results in a spike of requests for assistance to Police and Ambulance services after the hours of 0000 hours when resources are most limited. The applicant has been operating in the vicinity for some time but only until 2300 hours. There is nothing within the operating schedule relating to the issues in the area. **Police suggest that in order to uphold the licensing objectives the applicant operate the premises with licensable activities from 0800 – 0000 hours daily. There should be minimum two members of staff after 1800 hours until the premises close.**

Licence Holder

The sale of alcohol to drunken people and children is a major cause of concern to police and highlighted in the Governments Alcohol Harm Reduction Strategy. Those who sell alcohol should be fully aware of the legislation and issues around alcohol and should be fully trained to a national standard.

Closed Circuit Television (CCTV)

Good quality CCTV is essential as a deterrent for the prevention of crime and the detection of offenders. It allows for both covert and overt monitoring of the premises. With proper signage, this reassures both staff and clientele, that this is a safe environment where illegal activities are not tolerated.

All cameras and recording equipment will be installed and maintained in accordance with Home Office Guidance and the manufacturers instructions and will be fully operational when the premises are open to the public.

Notices shall be displayed at the entrance to the premises, and in prominent positions throughout the premises, advising that CCTV is in operation.

Operating Hours to be displayed on Premises

A notice displaying the opening hours, the type of licensing activity and licence conditions should be clearly displayed and visible to anyone outside the premises. This may be incorporated in the summary of the licence, which must be displayed, or take the form of a separate item. Likewise the name of the Designated Premises Supervisor (D.P.S.) should be similarly displayed. This will allow the Police and other responsible authorities to readily identify the licence details. Clearly displayed opening hours will also reduce any confusion for

customers prior to entering the premises and possible conflict when the premises close/stop selling alcohol. A Summary of the Premises Licence will be displayed at each public entrance to the premises.

Police require the following points should be added as conditions on the premises licence as below.

CCTV shall be installed to Home Office Guidance standards and maintained in a good working condition and recordings shall be kept for 31 days and shall be made available to police and authorised Officers from Brent Council upon request.

CCTV cameras shall be installed to cover the entrance of the premises.

The CCTV system shall be capable of obtaining clear facial recognition images and a clear head and shoulders image of every person entering or leaving the premises.

A copy of the premises licence summary including the hours which licensable activities are permitted shall be visible from the outside of each entrance to the premises.

No high strength beers, lagers, and ciders above 6.0% ABV shall be stocked or sold.

A "Challenge 25" policy shall be adopted and adhered to.

A sign stating "No proof of age – No sale" shall be displayed at the point of sale.

A suitable intruder alarm complete with panic button shall be fitted and maintained.

A clear and unobstructed view into the premises shall be maintained at all times.

Any staff directly involved in selling alcohol for retail to consumers, staff who provide training and all managers will undergo regular training of Licensing Act 2003 legislation. This will be documented and signed for by the DPS and the member of staff receiving the training. This training log shall be kept on the premises and made available for inspection by police and relevant authorities upon request.

No single cans or bottles of beer, larger or cider shall be sold.

All alcohol stocked and sold shall be labelled with the name of Costcutter

An incident log shall be kept at the premises, and made available for Inspection on request to an authorised officer of Brent Council or the Police, which will record the following:

All crimes reported to the venue

Any complaints received

Any faults in the CCTV system

Any refusal of the sale of alcohol

Any visit by a relevant authority or emergency service.

Outside of the hours authorised for the sale of alcohol, all alcohol within the trading area is to be secured behind either locked grills, locked screens or locked cabinet doors so as to prevent access to the alcohol by customers or staff.

The following crime prevention measures shall be implemented:

A time delay safe with deposit slot and anti fishing mechanisms must be used at the counter till area

Regular robbery awareness and cash minimization training shall be given to all staff.

Yours Sincerely,

Nicola McDonald PC 157QK
Licensing Constable Brent Police