



Alcohol and Entertainment Licensing Sub-Committee

Tuesday 23 November 2021 at 10.00 am

This will be held as an online virtual Meeting

Details on how to access the link in order to view the meeting will be made available online via the following link: [HERE](#)

Membership:

Members

Councillors:

Ahmed (Chair)
Hector
Shahzad

Substitute Members

Councillors:

Denselow, Chohan, Hylton, Grahl, Long, McLeish,
Maurice

For further information contact: Devbai Bhanji, Governance Assistant
Tel: 020 8937 6841; Email: devbai.bhanji@brent.gov.uk

For electronic copies of minutes, reports and agendas, and to be alerted when the minutes of this meeting have been published visit:

www.brent.gov.uk/committees

The press and public are welcome to attend this meeting as an online virtual meeting. The link to view the meeting will be made available via the following link: [HERE](#)

Notes for Members - Declarations of Interest:

If a Member is aware they have a Disclosable Pecuniary Interest* in an item of business, they must declare its existence and nature at the start of the meeting or when it becomes apparent and must leave the room without participating in discussion of the item.

If a Member is aware they have a Personal Interest** in an item of business, they must declare its existence and nature at the start of the meeting or when it becomes apparent.

If the Personal Interest is also significant enough to affect your judgement of a public interest and either it affects a financial position or relates to a regulatory matter then after disclosing the interest to the meeting the Member must leave the room without participating in discussion of the item, except that they may first make representations, answer questions or give evidence relating to the matter, provided that the public are allowed to attend the meeting for those purposes.

***Disclosable Pecuniary Interests:**

- (a) **Employment, etc.** - Any employment, office, trade, profession or vocation carried on for profit gain.
- (b) **Sponsorship** - Any payment or other financial benefit in respect of expenses in carrying out duties as a member, or of election; including from a trade union.
- (c) **Contracts** - Any current contract for goods, services or works, between the Councillors or their partner (or a body in which one has a beneficial interest) and the council.
- (d) **Land** - Any beneficial interest in land which is within the council's area.
- (e) **Licences** - Any licence to occupy land in the council's area for a month or longer.
- (f) **Corporate tenancies** - Any tenancy between the council and a body in which the Councillor or their partner have a beneficial interest.
- (g) **Securities** - Any beneficial interest in securities of a body which has a place of business or land in the council's area, if the total nominal value of the securities exceeds £25,000 or one hundredth of the total issued share capital of that body or of any one class of its issued share capital.

****Personal Interests:**

The business relates to or affects:

- (a) Anybody of which you are a member or in a position of general control or management, and:
 - To which you are appointed by the council;
 - which exercises functions of a public nature;
 - which is directed is to charitable purposes;
 - whose principal purposes include the influence of public opinion or policy (including a political party or trade union).
 - (b) The interests of a person from whom you have received gifts or hospitality of at least £50 as a member in the municipal year;
- or

A decision in relation to that business might reasonably be regarded as affecting the well-being or financial position of:

- You yourself;
- a member of your family or your friend or any person with whom you have a close association or any person or body who is the subject of a registrable personal interest.

Agenda

Introductions, if appropriate.

Item	Page
1	Apologies for absence and clarification of alternate members
2	Declarations of Interests Members are invited to declare at this stage of the meeting, the nature and existence of any relevant disclosable pecuniary or personal interests in the items on this agenda and to specify the item(s) to which they relate.
3	Application for New Premises Licence by Mr Muthulingam Yasotharan for the premises known as SMS Food City, 288 Ealing Road, Wembley, HA0 4LL, pursuant to the provisions of the Licensing Act 2003 1 - 32

Date of the next meeting: Tuesday 23 November 2021, 2.00pm



Please remember to **SWITCH OFF** your mobile phone during the meeting.

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LICENSING ACT 2003

Application for New Premises Licence

1. The Application

Name of Applicant:	Mr Muthulingam Yasotharan
Name & Address of Premises:	SMS Food City, 288 Ealing Road, Wembley, HA0 4LL
Applicants Agent:	Greenhill Licences

The application is for a new premises licence:

- 1 For the sale of alcohol and to remain open from 8am to midnight Monday to Sunday.

2. Background

The review of the Statement of Licensing Policy has introduced Cumulative Impact Zones for all new or variation applications for 'Off' licences in the borough.

Cumulative Impact Zones are a tool outlined in the Licensing Act 2003 to address alcohol related anti-social behaviour where authorising of further licences in a specific area may undermine the promotion of the licensing objectives.

This application falls within a Cumulative Impact Zone.

3. Promotion of the Licensing Objectives

See page 2 & 3 of the application

4. Relevant Representations

Representations are received and from the Police, Licensing Officers and the Ward Councillors.

5. Interested Parties

None

6. Policy Considerations

Policy 1 – Process for Applications

Conditions on the licence, additional to those voluntarily sought/agreed by the applicant, may be considered. Conditions will focus on matters which are within the control of individual licensee and which relate to the premises or areas being used for licensable

activities, the potential impact of the resulting activities in the vicinity. If situations arise where the licensing objectives may be undermined but cannot be dealt with by the use of appropriate conditions the Licensing Authority will consider whether it is appropriate for a licence to be granted or continue to operate.

7. Determination of the Application

Members can take the following steps when determining a new premises licence application:

- grant the licence;
- exclude from the scope of the licence any of the licensable activities to which the application relates;
- refuse to specify a person in the licence as the premises supervisor;
- reject the application

8. Associated Papers

- A. Application Form & Plan
- B. Police Representation
- C. Licensing Representation
- D. Councillor Shah Rep
- E. Councillor Sheth Rep
- F. OS Map

Part 1 – Premises Details

Postal address of premises, or if none, ordinance survey map reference or description

SMS FOOD CITY
288 Ealing Road, Wembley, Brent, HA0 4LL

Telephone Number at premises (if any):

Non domestic rateable value: 20250

Part 2 – Applicant Details

Proposed Licence Holder:
Mr MUTHULINGAM YASOTHARAN



Part 3 – Operating Schedule

When do you want the premises licence to start? 01-11-2021

If you wish the licence to be valid only for a limited period, when do you want it to end?

If 5,000 or more people are expected to attend the premises at any one time, please state the number expected to attend:

Please give a general description of the premises: THIS IS IN THE CIZ .THIS IS CURRENTLY A GROCERY FOOD STORE . SITUATED ALONG A MAIN ROAD WITH OTHER BUSINESS PREMISES. PROPOSING TO ADD ALCOHOL TO RETAIL FOR CONSUMPTION OFF THE PREMISES MONDAY TO SUNDAY .8AM TO MIDNIGHT.

What licensable activities do you intend to carry on from the premises?

Section J: Sale of alcohol: Off the premises

The times the licence authorises the carrying out of licensable activities

Section J: Sale or Supply of Alcohol: Off the premises

<u>Day</u>	<u>Start Time</u>	<u>End Time</u>
Monday	08:00	00:00
Tuesday	08:00	00:00
Wednesday	08:00	00:00
Thursday	08:00	00:00
Friday	08:00	00:00
Saturday	08:00	00:00
Sunday	08:00	00:00

State the name and details of the individual whom you wish to specify on the licence as designated premises supervisor:

MUTHULINGAM YASOTHARAN

Date of birth:

[REDACTED]

Licence Number:

Issuing authority:

[REDACTED]

Concerns in respect of Children: NONE

The opening hours of the premises

<u>Day</u>	<u>Start Time</u>	<u>End Time</u>
Monday	08:00	00:00
Tuesday	08:00	00:00
Wednesday	08:00	00:00
Thursday	08:00	00:00
Friday	08:00	00:00
Saturday	08:00	00:00
Sunday	08:00	00:00

a) General – all four licensing objectives (b, c, d, e): ALL DUTIES TO BE A RESPONSIBLE RETAILER WILL BE CONDUCTED IN A MANNER SUITABLE NOT TO UNDERMINE THE OBJECTIVES OF THE LICENCE ACT 2003. ALL STAFF EMPLOYED WILL GO THROUGH IN HOUSE ALCOHOL RETAIL TRAINING. THE APPLICANT HAS OVER 12 YEARS RETAIL OFF LICENCE EXPERIENCE . CCTV shall be installed to Home Office Guidance standards and maintained in a good working condition . A sign stating "No proof of age -- No sale" shall be displayed at the point of sale. A "Challenge 25" policy shall be adopted and adhered to. A refusal book shall be kept and maintained. No high strength beers, lagers, and ciders above 6.5% ABV shall be stocked with the exception of premium beers and all staff given suitable training. The licensee shall keep an incident book which shall be made available to the Police and Licensing Authority. A clear and unobstructed view into the premises shall be maintained at all times. 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. Staff understanding and speaking in English will be working on the premises .

b) The prevention of crime and disorder: CCTV will be retained for a minimum of 28 days and made available within 24 hours of a request being made by a relevant authority when they provide a usb stick. A member of staff will be present at all times whilst the premises is open to the public who is trained to operate the CCTV system. All staff training will be refreshed every 12 months and a written training log will remain on the premises and be produced to the relevant authorities upon a request being made. A refusal and incident book will be kept on the premises, this will be updated accordingly and produced to the relevant authorities upon a request being made.

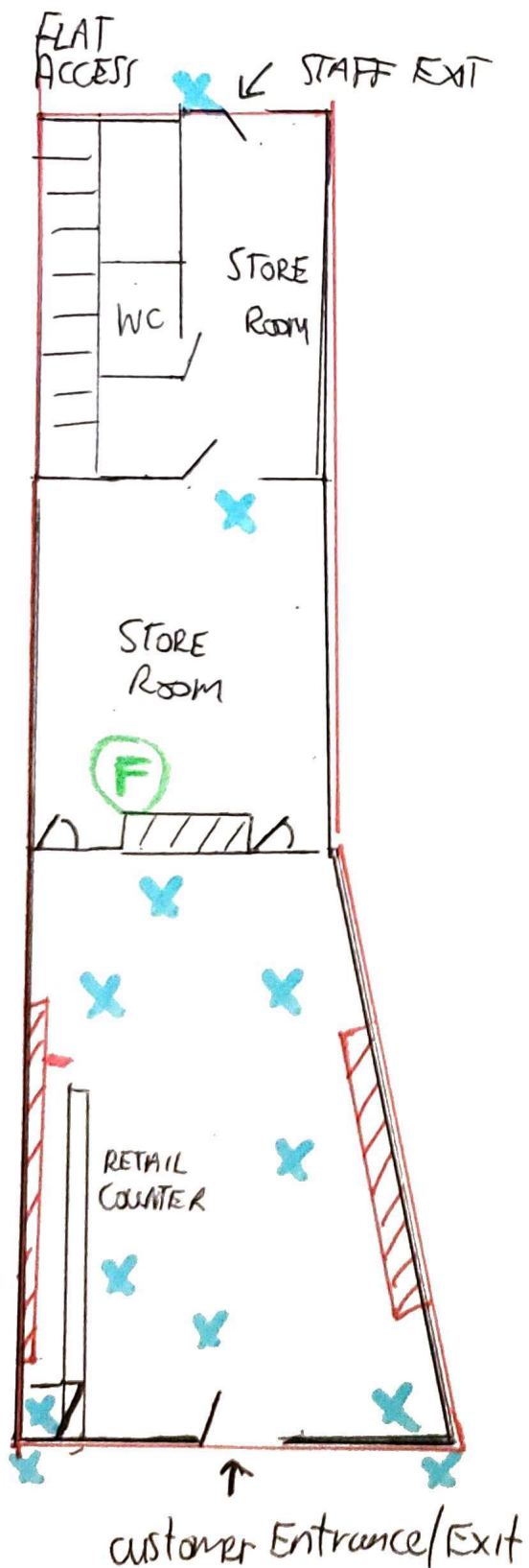
c) Public safety: The store will be kept clean and clear of obstruction for customers

d) The prevention of public nuisance: No dustbins will be emptied after the shop closes. Posters will be place on the wall in shop and exit to tell customers to leave quietly

e) The protection of children from harm: CCTV system installed inside & outside. Acceptance of accredited 'Proof of age' cards and / or passport. or driving Licence with photograph. Training of staff to be aware of underage purchasing Challenge 25 posters will be displayed. 'No proper ID No Sale policy. Maintain a refusals book. Kept behind the counter

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SMS FOOD CITY	
288 EALING ROAD	WEMBLEY MIDDX. HA0 4LL



SCALE 1:100 1cm : 1 METRE	
	- Licensible Area
	- Proposed Area for Alcohol
X	- CCTV camera points
F	- Fire Extinguisher
Greenhill Licences 07766003951 greenhill.licences@btmail.com	
DATED : 30/09/2021	

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The Licensing Authority

*Brent Civic Centre
Engineers Way
Wembley
Middlesex
HA9 0FJ*

Your ref: 22714

Our ref: 21/2965NW

Brent Borough Licensing Department

*Harrow Police Station
74, Northolt Road
Harrow
Middlesex
HA2 0DN*

E-mail: Gary.L.R.Norton@met.police.uk

Web: www.met.police.uk

Date: 20/10/2021

Police objections to a New Premises Licence application for:

"SMS Food City, 288 Ealing Road, Wembley, Brent, HA0 4LL".

I acknowledge receipt of an application for a new Premises Licence under section 17 of the Licensing Act 2003, for SMS Food City, 288 Ealing Road, Wembley, Brent, HA0 4LL.

On behalf of the Commissioner of Police of the Metropolis, I wish to make a representation, as police believe the following objectives will be undermined, namely the Prevention of Crime and Disorder and the Prevention of Public Nuisance.

The premises is situated in a busy, densely populated area of Ealing Road, close to the Alperton end of Wembley.

According to www.police.uk, crime reporting in the postcode area of HA0 4LL in Wembley shows a 12 month average of reported incidents of 209 per month. The lowest figure has been 163 in one month, the highest 251. Naturally this excludes incidents that went unreported. Typically, a third of the reported crimes involve anti-social behaviour, public disorder and offences against the person.

The area at the bottom of Ealing Road has a significant issue with street drinkers, which in turn creates other issues such as crime, disorder, public nuisance and littering. This area, along with a number of others on Brent has come to notice time and again. Part of the issue is the saturation of venues that provide off sales, which has led to the Ealing Road area being designated as one of the Brent boroughs Cumulative Impact Zones.

The Cumulative Impact Policy applies only to Off-Licences. Where an application for a new off-licence or for variations to off-licences is received (which would increase the sale of alcohol, including through longer hours), the presumption is that the application will be refused unless the applicant can

satisfactorily evidence that their application or variation will not negatively impact on the licensing objectives.

The application itself shows no insight or new strategy to cope with adding to the over saturation of off-licence premises in the area. The general description of the premises in the application states: "THIS IS IN THE CIZ .THIS IS CURRENTLY A GROCERY FOOD STORE. SITUATED ALONG A MAIN ROAD WITH OTHER BUSINESS PREMISES. PROPOSING TO ADD ALCOHOL TO RETAIL FOR CONSUMPTION OFF THE PREMISES MONDAY TO SUNDAY .8AM TO MIDNIGHT."

Some of the applicants proposed licensing conditions themselves fall short of recognised standards in Brent licensing. Given the applicant knows that the area is within a CIZ, there is little in the application to show they understand the issues of the area. On 5th October 2021, we received an e-mail from the applicant's agent, amending some of the proposed conditions and adding others in. Again, as many other venues in the vicinity have more extensive conditions, yet problems persist in the area. We are trying to organise more visits to premises in this area, as well as others, since the COVID restrictions were relaxed. However, it is impossible for police and Council licensing resources to cover all these premises on a regular basis, so adding more of the same venues will only add to the problem.

Whilst I can appreciate adding alcohol sales into a business plan is an easy win for the seller, it won't help the area combat the existing issues that contribute to crime, disorder, public nuisance and littering. For this reason, we oppose the application as it's in a CIZ.

Yours Sincerely,

Gary Norton 2965NW
Licensing Constable – Brent Police

SMS Food City
288 Ealing Road
Wembley
HA0 4LL

1 November 2021

Dear Sir/Madam,

Licensing Representation to the Initial Application for the Premises Licence at SMS Food City, 288 Ealing Road, Wembley, HA0 4LL

I certify that I have considered the application shown above and I wish to make a representation that the likely effect of the grant of the application is detrimental to the Licensing Objectives for the reasons indicated below.

An officer of the Licensing Authority, 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 new premises licence under section 17 of the Act.

The Licensing Authority representations are primarily concerned with the four licensing objectives;

- the prevention of crime and disorder;
- public safety;
- the prevention of public nuisance; and
- the protection of children from harm.

Cumulative Impact Zone (CIZ)

The Council's current Licensing Policy came into effect in January 2020. Crime and complaints assessments in 2015, did not identify any requirement for a CIZs. However, since 2016 there has been a significant and notable increase in alcohol related crime and anti-social behaviour which is having an adverse impact in some areas and neighbourhoods generating complaints from residents, councillors and the Police. This is undermining the licensing objectives and also has potential to undermine the vitality of Brent's town centres.

Wembley Central which includes Ealing Road has been identified as one of ten Cumulative Impact Zones (CIZs) in Brent, where the authorising of further licences may undermine the promotion of the licensing objectives.

The Statement of Licensing Policy states: -

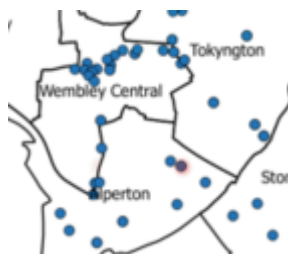
'Ealing Road

There are low level anti-social behaviour issues related to street drinking such as urination, defaecation etc. in this area. It is one of the areas where highest number of warning letters and fixed penalty notices have been issued to street drinkers. Further evidence has been provided by residents in the form of petition received during one of the licensing hearings. Therefore, it is proposed that a CIZ be introduced for off-licences on Ealing Road from the junction of High Road Wembley up to the junction of Bridgewater Road. The CIZ area includes Atlip Road, Mount Pleasant Road up to the junction of Orchard Close, Montrose crescent, Union Road and Coronet Parade'.

Data captured from various sources including alcohol related police and ambulance call outs has been mapped and shown sufficient evidence to implement CIZs in the specified area. In particular crime data and evidence shows a correlation between concentrations of off-licences and alcohol related anti-social behaviour, particularly that associated with street drinking.

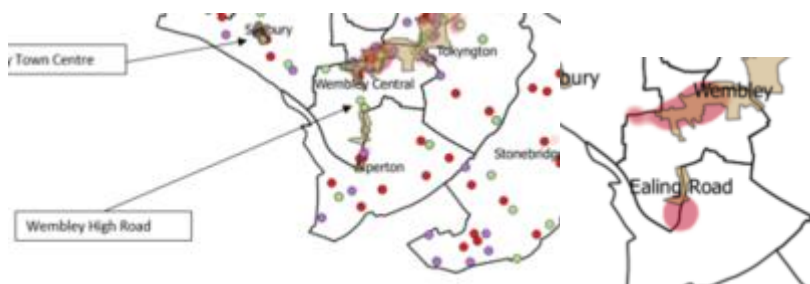
Street Drinking Hotspots

There are relatively few calls to police specifically about street drinking. This may be because they are recorded as other ASB types such as littering or noise. Between 01/06/2017 and 31/05/2018, there were only 53 calls to police. The following year, there were 142. This represents an increase of 168%. Part of this increase may be attributed to callers being aware of the borough wide PSPO on drinking in public which came into effect in October 2017.



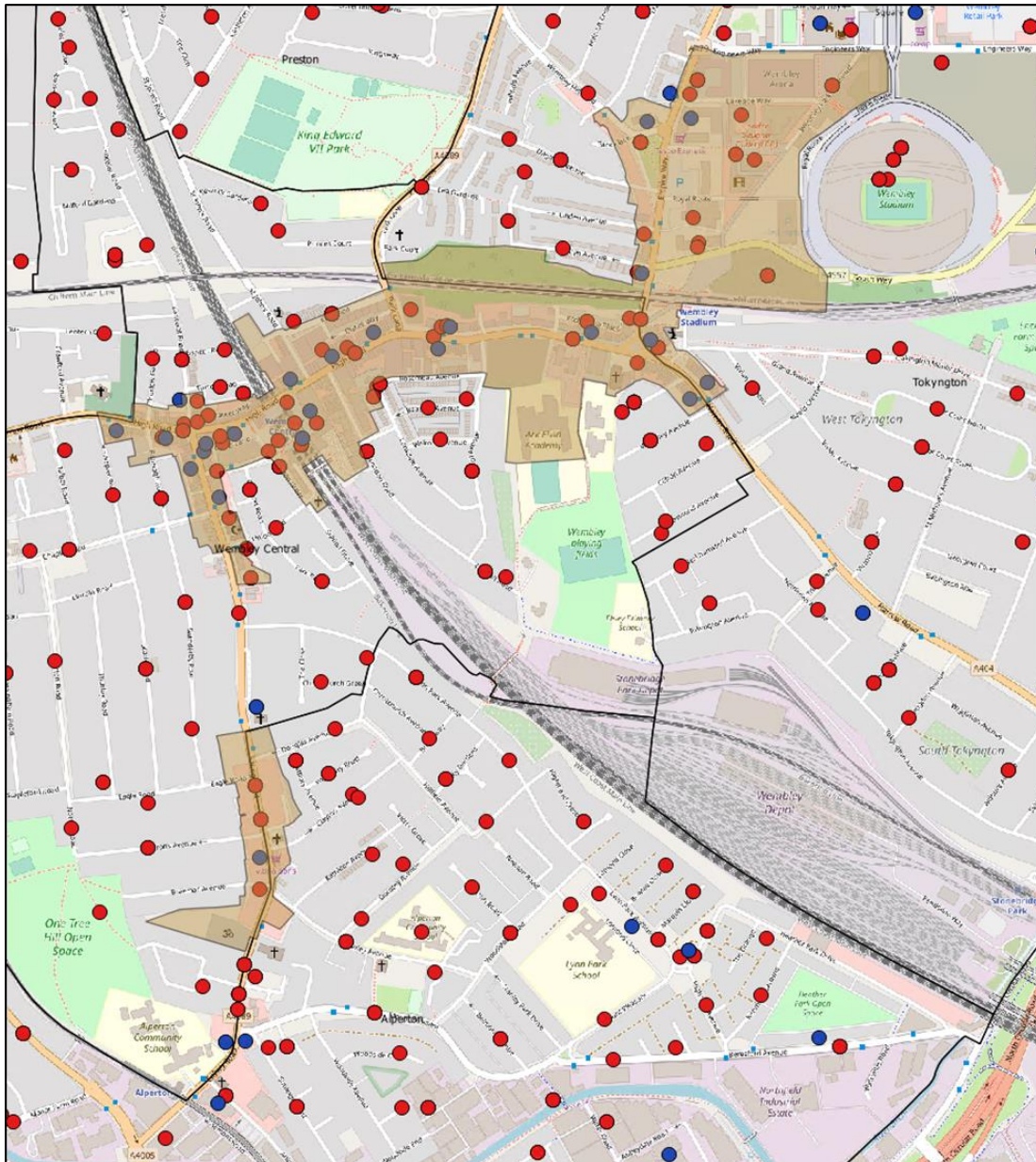
Calls to police specifically related to street drinking between 01/06/2017 and 31/05/2019

Hotspots in Brent in Ambulance and Police alcohol flagged call out data

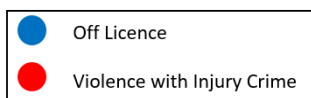


Alcohol-related ambulance and Police calls between 01/06/2017 to 31/05/2019

Hotspot of Violence with Injury Crimes

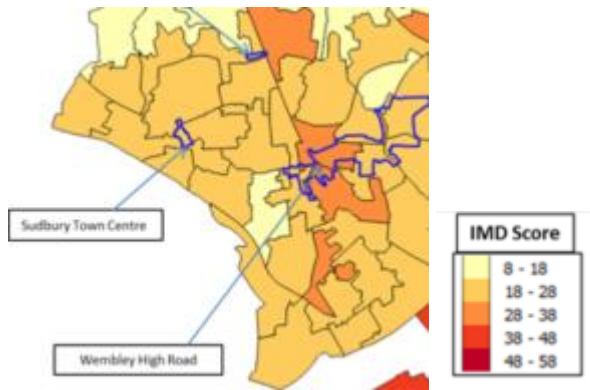


All violence with injury crimes and offences in Wembley (01/06/2017 and 31/05/2019)



Brent Index of Multiple Deprivation (IMD) score 2015 by Lower Super Output Areas

The Index of Multiple is made up of income deprivation, employment deprivation, education, skills and training deprivation, health deprivation and disability, crime, barriers to housing services and living environment.



Brent Index of Multiple Deprivation (IMD) score 2015 by Lower Super Output Areas

The purpose of the CIZ in Wembley Central and Ealing Road, is to address the issues mentioned above.

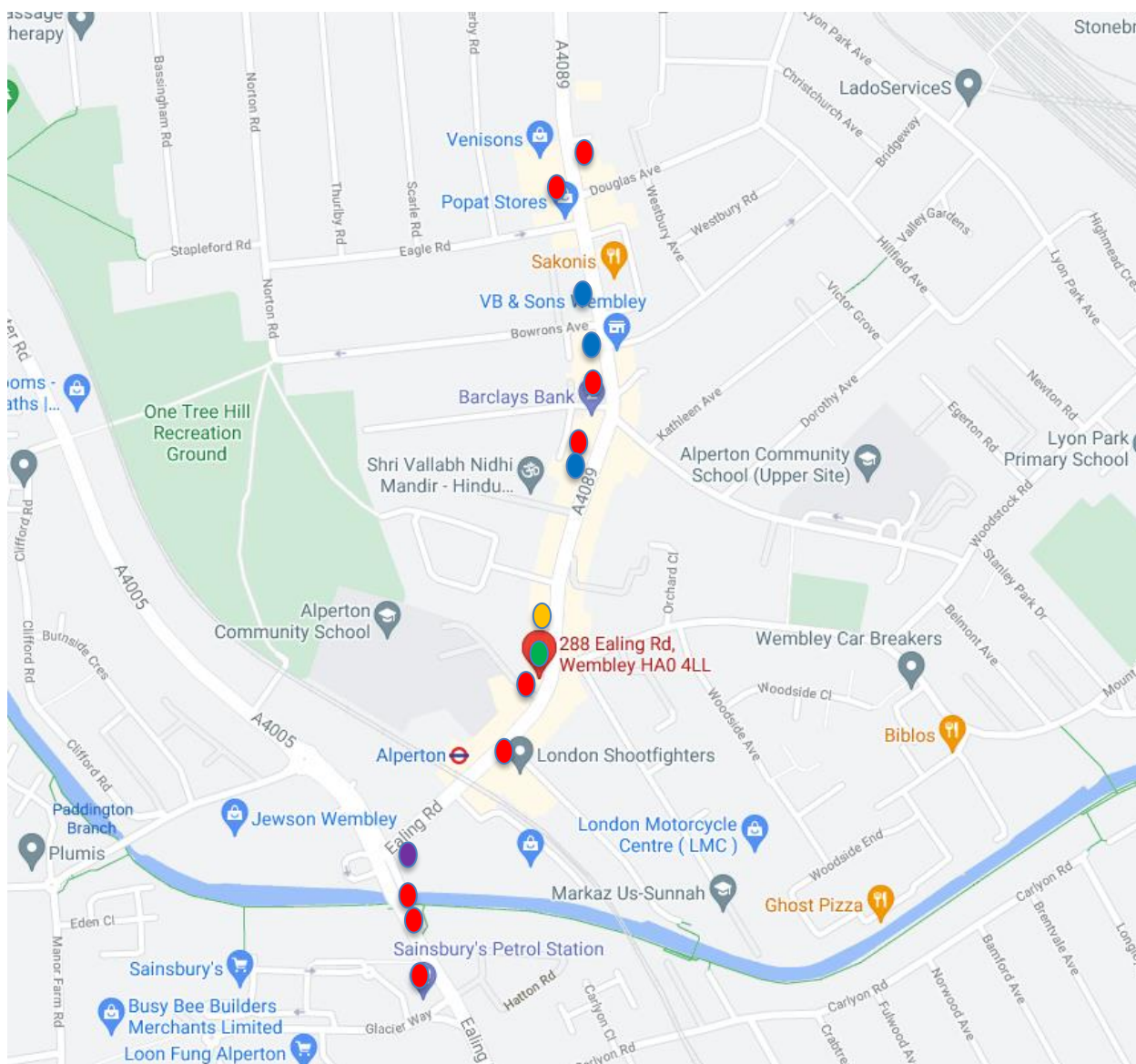
The Premises

The premises, namely SMS Food City, 288 Ealing Road, Wembley, HA0 4LL, falls within one of Brent's ten CIZs.




Proposed site for SMS Food City, 288 Ealing Road, Wembley, HA0 4LL

The premises itself is located close to the junction of Ealing Road and Mount Pleasant.








Below is a table which shows all of the current off licences in the local area.

Name	Address	Supply of Alcohol	Grant Date	
Wembley Off Licence	95 Ealing Road	09.00hrs-23.00hrs	Januray 2010	●
Ealing Newsagent	154 Ealing Road	09.00hrs-23.00hrs	January 2020	●
Sivashakthi Cash & Carry	1 - 3, Atlip Centre, Atlip Road	24 Hours	February 2015	●
DX Telecom	Unit 8-11, 190 Ealing Road	N/a	Refused by Committee September 2008	●
Alpertons Stationary Shop	200 Ealing Road	N/a	Refused by Committee March 2021	●
Sidney's Off Licence	216 Ealing Road	08.00hrs-23.00hrs	November 2005	●

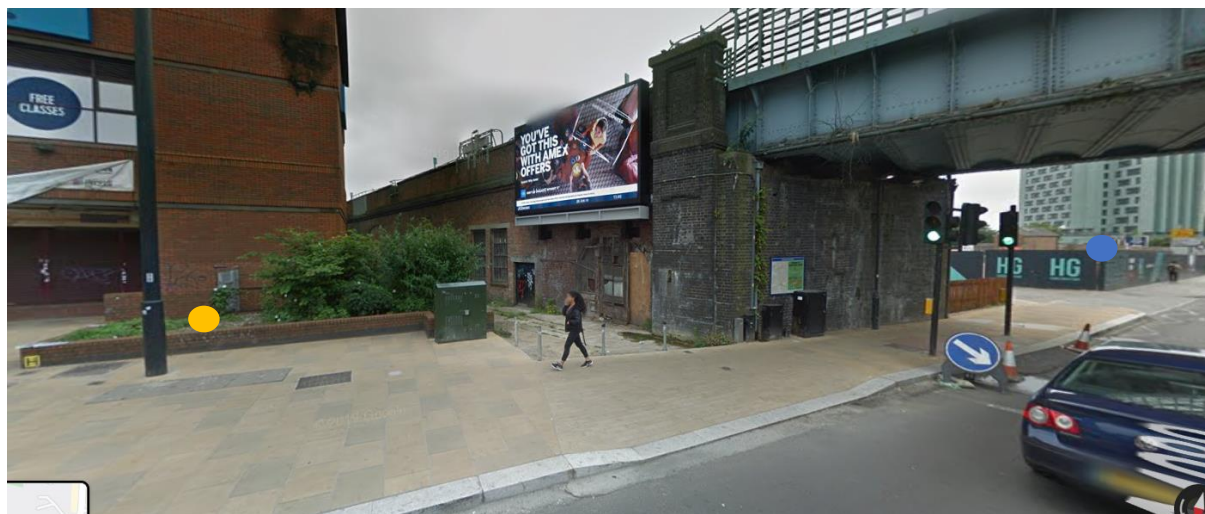
DIU Portugal	234 Ealing Road	09.00hrs-23.00hrs	January 2018	
Star Telecom	Unit D, 236 Ealing Road	N/a	Refused by Committee July 2010	
Sanremo Liquor	276 Ealing Road	08.00hrs-23.00hrs Not currently supplying alcohol	November 2005 Premises Licence Suspended since March 2020	
Alperton Point	290 Ealing Road	24 Hours	September 2005	
Lidl	Minavil House, Ealing Road,	08.00hrs-23.00hrs	July 2020	
Sainsbury's	360 Ealing Road	24 Hours	November 2005	
Londis	406-408 Ealing Road	08.00hrs-23.00hrs	July 2005	
S & S Superstores	414 Ealing Road	05.00hrs-23.00hrs	November 2005	
SMS Food City	288 Ealing Road	08.00hrs-00.00hrs	Proposed Application	

Key:

-  Currently Supplying Alcohol
-  Refused by Committee
-  Proposed Application
-  Under Construction
-  Premises Licence Suspended

There are currently 11 premises licensed to supply alcohol, one of which is still under construction and another that is currently a dessert venue which does not supply alcohol.

Historically there have been issues of street drinking within a 1 minute walk from the proposed premises (opposite Alperton station). In 2017 photographs were taken of a sea of empty beer cans that were frequently left behind a sectioned off brick wall. These are shown in the photographs below.

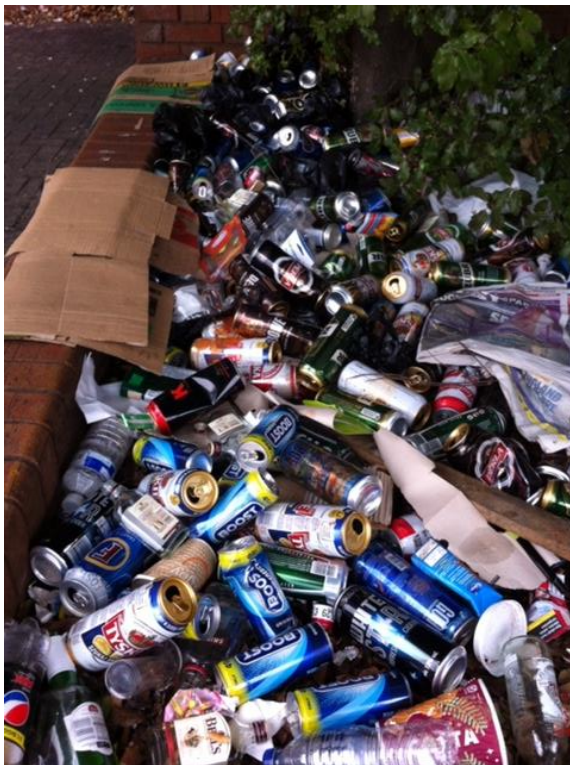


Key:

Location where street drinkers were known to drink ●



Ealing Road – Photograph taken 16th November 2017 @ 10.30am



Ealing Road – Photograph taken 16th November 2017 @ 10.30am



Ealing Road – Photograph taken 16th November 2017 @ 10.30am

As a result of an increase in complaints and enforcement action, the street drinkers stopped being so visible on the main road. This however has not resolved the problem, but instead moved it to another location nearby. In 2020, the local Anti-Social Behaviour officer reported that the street drinkers had moved off the main thorough-fare onto the end of Atlip Road, where they drank on top of and underneath the canal bridge.

On 29th October 2021, a visit was undertaken to the same area to see whether issues of street drinking were still visible. The following photographs demonstrate that the issue of street drinking still persists.



Ealing Road – Photograph taken 29th October @ 13.30hrs



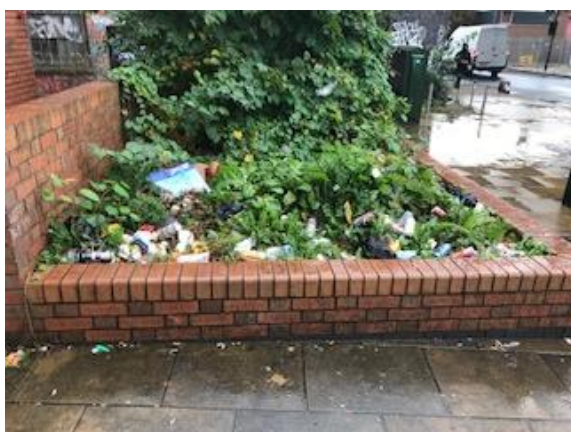
Ealing Road – Photograph taken 29th October @ 13.30hrs



Ealing Road – Photograph taken 29th October @ 13.30hrs



Ealing Road – Photograph taken 29th October @ 13.30hrs



Ealing Road – Photograph taken 29th October @ 13.30hrs



Ealing Road – Photograph taken 29th October @ 13.30hrs



Ealing Road – Photograph taken 29th October @ 13.30hrs

Public Space Protection Order (PSPO)

The entire Borough of Brent is subject to a Public Space Protection Order for street drinking and therefore it is an offence to drink alcohol in any public place.

If a police officer reasonably believes that a person is, or has been, consuming intoxicating liquor within these areas, the officer may require the person concerned:

- a) not to consume in that place anything which is, or which the officer reasonably believes to be, intoxicating liquor
- b) to surrender anything in his/her possession which is, or which the officer reasonably believes to be, intoxicating liquor or a container for such liquor (other than a sealed container)
- c) An officer may dispose of anything surrendered to him/her as above.
- d) Issue fixed penalty notices on offenders
- e) Prosecute persistent offenders

However, in reality there are limited police officer resources, which in practice would prevent the above from being enforced. This therefore places a greater emphasis on the responsibility of those premises that are selling alcohol for consumption off the premises. It is clear that if off licences did not exist, the number of street drinkers would decline.

Therefore simply selling alcohol to customers who once off the premises, are no longer the responsibility of the licence holder, the Designated Premises Supervisor (DPS) and/or members of staff is no longer a viable option.

Linking Street Drinkers to Off-Licences

It is increasingly difficult to link issues with off-licences who serve street drinkers. Street drinkers are reluctant to give up information on where they have purchased their alcohol so as not to alert enforcement officers.

Street drinkers are happy to walk some distance to ensure they can drink without being seen. It can therefore be difficult to know where street drinkers have purchased alcohol when they no longer stay close to the premises where they have purchased the alcohol.

Historically street drinkers were also obvious in appearance. This is no longer the case, at times making it difficult for check-out staff to differentiate, therefore creating a pressure on them when selling alcohol.

Premises Licence Application

Operational Plan, Local Research & Conditions

The application which proposes a number of conditions, does not appear to consider customers once they leave the premises.

Simply listing a number of conditions without any type of substantive operational plan for example, appears inadequate. The Licensing Authority would expect to see information on how the business plans to ensure that their particular premises will go above and beyond in promoting the licensing objectives in an area located within a CIZ.

There has been no indication that the premises has done any research on issues such as street drinking in the immediate area and presented the outcome of those findings with the application. Even if it is the case that the street drinkers weren't located during such research, it would go a long way in showing that the premises had attempted to understand the local issues.

This would go some way in reassuring the Licensing Authority that the business has tried to consider whether the impact of adding an additional off licence would in fact impact the area before signing a lease (an assumption is made here that this has already taken place) to add a further supermarket to this area.

Safeguarding the Local Area

The Statement of Licensing Policy lists considerations to be made when applying for a new premises licence, particularly those considerations relating to street drinking.

However, the conditions that are mentioned in the application fail to address the likes of such things outside of the premises that could be directly linked back to the premises. This includes items such as the clearing up of litter which may be left outside the premises by customers, the labelling of alcohol with the premises name in order to link street drinkers back to the premises or measures to discourage street drinkers from loitering outside the premises.

The application also suggests an alcohol content of up to 6.5%, despite Brent's pool of model conditions setting a suggested limit of 6%. Although the applicant would not necessarily know that a suggested limit exists, they could have made enquiries prior to making an application.

Although 6.5% is not the same as some of the higher strength alcohol that exists, Brent Council's Statement of Licensing Policy makes it clear that a voluntary offering of a ban on high strength alcohol sales does not necessarily address the requirements under a Cumulative Impact Zone.

The application proposes that alcohol is sold from 08.00hrs which again does not give the Licensing Authority any reassurance that the premises has taken any of the local issues into consideration.

Summary

The Statement of Licensing Policy states that any licence application in a CIZ area will need to demonstrate with evidence that its operation will not add to any cumulative impacts that the CIZ is seeking to address. Further, new applicants and those applying for variations would be required to demonstrate how their premises will not contribute to street drinking in those areas.

The effect of adopting a CIZ is to "create a rebuttable presumption" that applications for licences which are likely to add to the existing cumulative impact will normally be refused (or subject to certain limitations) unless the applicant can demonstrate that there will be no negative cumulative impact on the licensing objectives.

Other than the list of proposed conditions, the application and operating schedule fails to demonstrate that a grant will not lead to a negative cumulative impact on one or more of the licensing objectives and to the contrary add to the issues of an existing saturated area.

It is on this basis, that the Licensing Authority ask that the application for a new premises licence is refused by the Licensing Sub-Committee. Adding conditions to a premises licence, in the Licensing Authority's opinion is not adequate when the application does not demonstrate what is being put in place in order to avoid further cumulative impact. Adding an off licence to the immediate area, will no doubt be detrimental to the local area.

Yours faithfully



Susana Figueiredo
Licensing Inspector
Regulatory Services

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Application number – 22714

From: Shah, Councillor Sonia <Cllr.Sonia.Shah@brent.gov.uk>
Sent: 10 October 2021 11:16
To: Business Licence <business.licence@brent.gov.uk>
Subject: RE: New premises licence application 22714 - Wembley Central

I oppose the premises licence being granted to the applicant as another off licence in the area would have a negative impact on the existing street drinking problem.

I hope this is sufficient as a representation, please let me know if not.

Best wishes,
Sonia

Cllr Sonia Shah

Labour Councillor for Wembley Central

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Application number – 22714

From: Sheth, Councillor Krupa <Cllr.Krupa.Sheth@brent.gov.uk>
Sent: 10 October 2021 11:50
To: Shah, Councillor Sonia <Cllr.Sonia.Shah@brent.gov.uk>
Subject: Re: New premises licence application 22714 - Wembley Central

Once again I echo Cllr Shah's thoughts. There are serious concerns with alcohol drinking in the area and ASB. And I would not want to encourage this issue any further.

Kind regards,

Krupa

Cllr Krupa Sheth

Councillor for Wembley Central, Brent

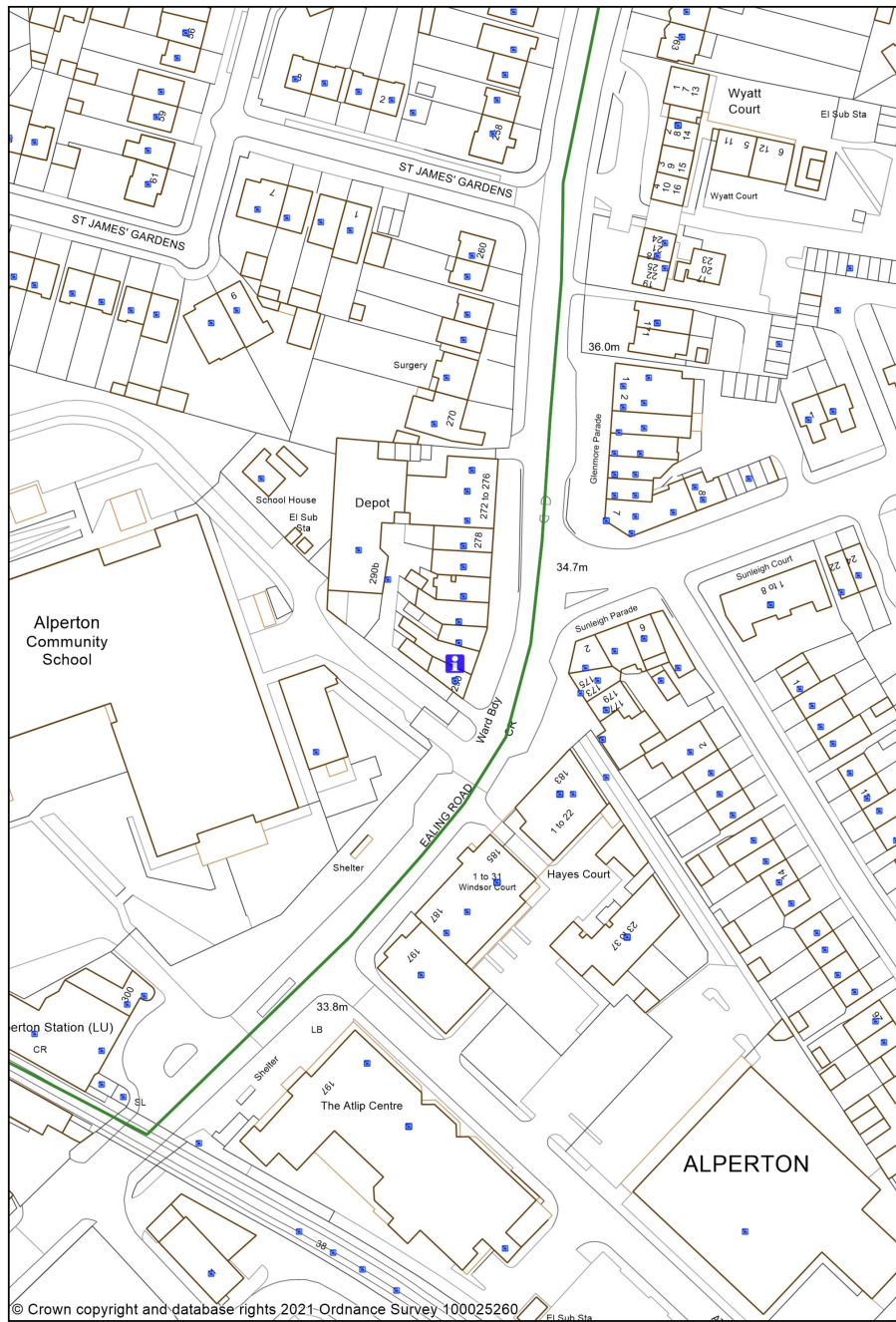
Cabinet Member for Environment

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| Brent Civic Centre, Engineers Way, Wembley, HA9 0FJ |

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Basemap Map



1:1250

0 0.02 0.04 kilometres



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