



Alcohol and Entertainment Licensing Sub-Committee

Thursday 22 August 2024 at 2.00 pm

Boardrooms 7&8 - Brent Civic Centre, Engineers Way,
Wembley HA9 0FJ

Please note this will be held as a physical meeting which all Committee members will be required to attend in person.

The meeting will be open for the press and public to attend or alternatively can be followed via the live webcast. The link to follow proceedings via the live webcast is available [HERE](#)

Membership:

Members

Councillors:

Ahmed (Chair)
Hylton

Substitute Members

Councillors:

Bajwa, Chohan, Ethapemi, Hack, Long, Lorber,
Mahmood, Rajan-Seelan

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

For electronic copies of minutes and agendas please visit:
[Council meetings and decision making | Brent Council](#)

The press and public are welcome to attend this meeting

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 a 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 for the premises known as Craven Park Local, 28 Craven Park Road, NW10 4AB, pursuant to the provisions of the Licensing Act 2003	1 - 26

Date of the next meeting: Tuesday 27 August 2024



- Please remember to **SWITCH OFF** your mobile phone during the meeting.
- The meeting room is accessible by lift and seats will be provided for members of the public.

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LICENSING ACT 2003

Application for New Premises Licence

1. The Application

Name of Applicant:	Mr Sathiaseelan Easwarakumar
Name & Address of Premises:	Craven Park Local, 28 Craven Park Road, NW10 4AB
Applicants Agent:	ADM Training Services

The application is for a new premises licence as follows:

The supply of alcohol and to remain open from 7am to 11pm 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.

This application falls within a Cumulative Impact Zone.

The presumption is that any new licence or variation to an existing licence that increases the scope for the sale of alcohol will not be granted unless the applicant can evidence that the licence will not negatively impact on the licensing objectives.

3. Promotion of the Licensing Objectives

See page 3 of the application.

4. Relevant Representations

Representations have been received from The Licensing Police, Licensing Officers, and a local resident.

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. Resident Rep
- E. OS Map

LICENSING ACT 2003

Licence: Premises Licence New Application
Application No: 31929

Dear Sir/Madam,

Applicant: Mr Sathiaseelan Easwarakumar

Date Received: 03 June 2024

An application was made to Brent Council under the Licensing Act 2003 by the above-named applicant. If you would like to make a representation please email business.licence@brent.gov.uk. Representations must specify in detail the grounds of opposition and must relate to the promotion of the licensing objectives.

In order that consideration of the application may not be delayed, it will be appreciated if a reply can be sent to us by

28 June 2024.

Yours faithfully

Vanessa Haulkhory
Licensing Support Officer
Regulatory Services

Part 1 – Premises Details

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

Craven Park Local
28 Craven Park Road, London, Brent, NW10 4AB

Telephone Number at premises (if any):

Non domestic rateable value:

Part 2 – Applicant Details

Proposed Licence Holder:
Mr Sathiaseelan Easwarakumar

[REDACTED]

Part 3 – Operating Schedule

When do you want the premises licence to start? 25-05-2024

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: Off licence post office and general store

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		
Day	Start Time	End Time
Monday	07:00	23:00
Tuesday	07:00	23:00
Wednesday	07:00	23:00
Thursday	07:00	23:00
Friday	07:00	23:00
Saturday	07:00	23:00
Sunday	07:00	23:00

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

Sathiaseelan Easwarakumar

Date of birth:

[REDACTED]

Licence Number: [REDACTED]

Issuing authority: BRENTSathiaseelan Easwarakumar

Date of birth:

[REDACTED]

Licence Number: [REDACTED]

Issuing authority: Brent

Concerns in respect of Children: None

The opening hours of the premises

Day	Start Time	End Time
Monday	07:00	23:00
Tuesday	07:00	23:00
Wednesday	07:00	23:00
Thursday	07:00	23:00
Friday	07:00	23:00
Saturday	07:00	23:00
Sunday	07:00	23:00

a) General – all four licensing objectives (b, c, d, e): All staff will be provided with training in relation to the licensing objectives that are commensurate with their duties. This will include the individual's responsibilities, age verification and licensing offences, as appropriate. Details of the training will be recorded in a personnel file or log book and will be refreshed at regular intervals.

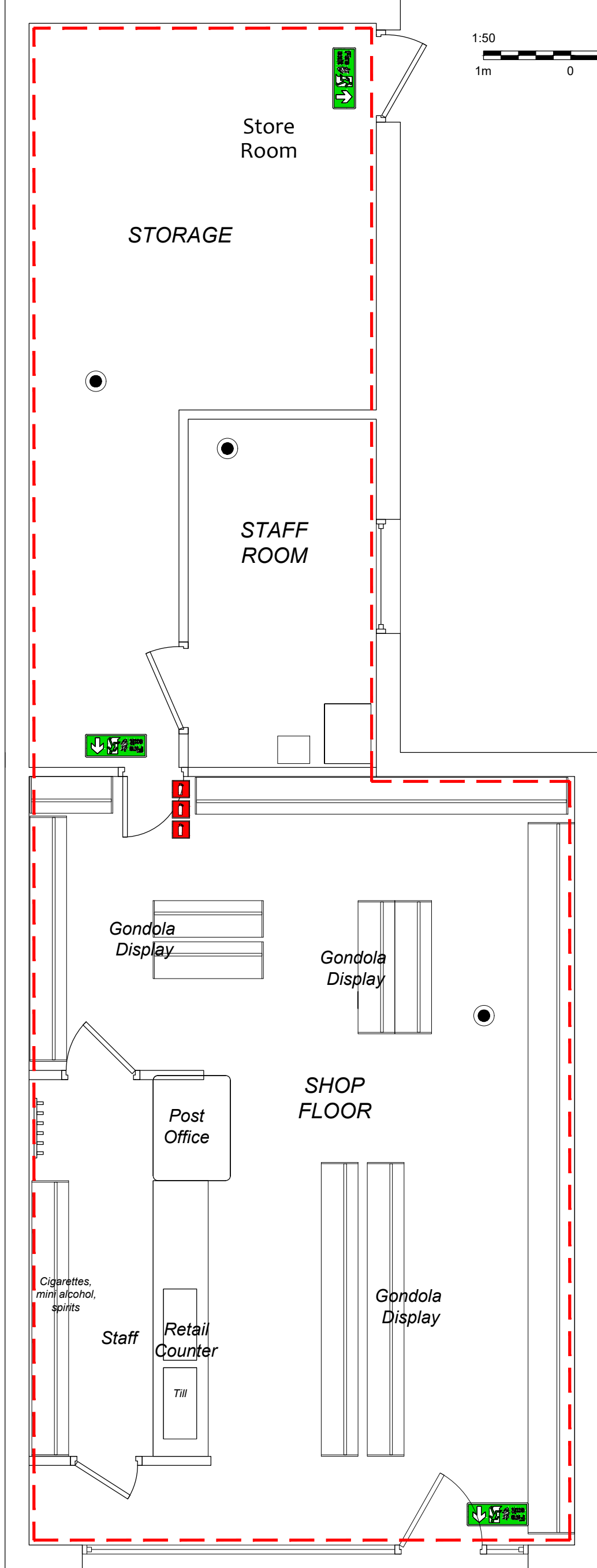
b) The prevention of crime and disorder: A CCTV system shall be maintained at the premises with cameras in the location indicated on the accompanying plan. Recordings shall be made of images from the camera whilst a licensable activity is taking place and shall be retained for a period of at least 31 days from the date of recording. A member of staff shall be trained on how to provide copies to police officers, where a request is received that complies with the requirements of the Data Protection Act 2003 and any other legislation covering the disclosure of recorded material. An incident book will be maintained in a non-loose leaf format to record details of any incidents in the premises that relate to the licensing objectives, in particular any refusals of sales of alcohol. Signage will be displayed at the exit to the premises that advises customers that they must not take open alcoholic beverages from the premises.

c) Public safety: All reasonable precautions will be made to keep the public safe on the premises. Fire risk assessments have been carried out by competent authorities, staff will be trained in fire safety procedures. Sufficient fire exits for the premises. Staff are trained in food safety procedures and food safety management documentation will be kept.





d) The prevention of public nuisance: A telephone number for the premises shall be displayed that is visible from the exterior of the building in the event that contact needs to be made with the staff to deal with any issue that might arise from licensable activity. Staff from the premises shall regularly monitor the exterior of the premises in an attempt to identify persons loitering in the area who may have purchased alcohol from the premises or appear to be accompanied by a person who has purchased alcohol from the premises. Where such persons are identified, they will be requested to leave the area. Persons identified as drinking alcohol in the immediate area around the premises (whether or not they have purchased alcohol from the premises) will be requested to leave and if they refuse to do so a report will be made to the police. Any person who refuses to leave the area, or is identified as causing antisocial behaviour, will be subject to a ban from the premises. A record of banned individuals shall be maintained in the premises and all staff made aware of the persons who are currently banned so that entry may be refused. The record shall be kept available for inspection while the premises are open for trading. All alcohol sold from the premises will be marked in a way that can be used to identify that the alcohol has been purchased from the shop. A regular inspection shall be made of the area immediately in the vicinity of the premises and any litter that can be reasonably assumed to have originated from the premises shall be collected for disposal.

e) The protection of children from harm: A Challenge 25 scheme will be adopted in compliance with the age verification conditions: Customers who appear under 25 years of age will be required to prove their age when purchasing alcohol. Suitable forms of identification will be a passport, a "Pass" card or other identification recognised by the licensing authority in its statement of licensing policy.

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Legend:

-  3 fire extinguishers- water, CO2 and foam
-  Fire escape sign
-  Smoke Detector/ Alarm
-  Demise of shop / area for which licence to sell & store alcohol is sought

Pavement

Pavement

Property address :
28 CRAVEN PARK ROAD
LONDON NW10 4AB

Project:
Licencing Application

Drawing Title:
Shop Unit Plan

Page 7

Proj. No: **AAM-01-24E**
Scale: **1/100 @ A3**

Dwg No: **LIC-01**

Date
May 27 2024

Page:
A3

ADM Food Safety & Licencing

Tel: 0208 8861 0400
Mob: 07950 685397
Em: admtraining58@gmail.com

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ADM Training Services
8 Oxford Road
Harrow
HA1 4JF

Our Ref: 31929

27 June 2024

Dear Sir/Madam,

Licensing Representation to the Initial Application for the Premises Licence at Craven Park Local, 28 Craven Park Road, NW10 4AB

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 7 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.

Data captured from various sources including alcohol related police and ambulance call outs have been mapped and have shown suitable evidence to implement CIZs in the specified areas. 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.

Harlesden has been identified as one of twelve 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: -

Harlesden

Harlesden town centre consists of a series of parades of shops that run along Craven Park, Craven Park Road, Park Parade and High Street Harlesden. The town centre falls between, Harlesden and Kensal Green ward and is one of the most deprived areas in the borough.

Harlesden Town Centre is a hotspot for alcohol flagged calls to the Police for crime and anti-social behaviour. It is also a hotspot for ambulance calls where the victim has sustained an injury. The data shows the whole of the town centre suffers from high levels of alcohol related issues, including residential streets off the main town centre such as Rucklidge Avenue, Wendover Road, Buckingham Road and St Albans Road.

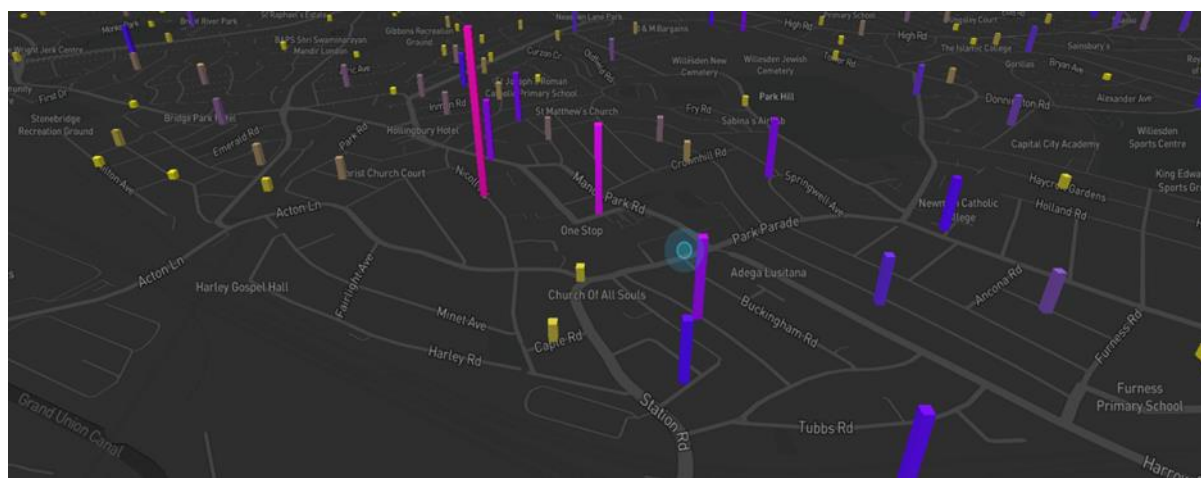
Harlesden Town Centre is also the primary hotspot for reports of street drinking to police. All other town centres in Brent suffers from street drinking; however, in parts of Harlesden such as Craven Park Road and High Street, the street drinking interrelates with drug misuse and violent crime.

Between 1 July 2021 and 30 June 2022 there were 321 reports to the police, including 184 relating to anti-social behaviour, 28 relating to public order breaches and 87 reports relating to violence.

The streets to be included in Harlesden are:

- Craven Park Road
- Craven Park
- High Street
- Park Parade
- Manor Park Road

The below map shows violence with injury crimes.



The purpose of the CIZ in Harlesden (Craven Park Road) is to address the issues mentioned above.

The Premises

The premises, namely Craven Park Local, 28 Craven Park Road, NW10 4AB falls within one of Brent's twelve CIZs.



Harlesden town centre consists of a series of parades of shops that run along Craven Park, Craven Park Road, Park Parade and High Street Harlesden. The town centre falls between, Harlesden and Kensal Green ward and is one of the most deprived areas in the borough. There are a number of existing off licences within a 5 minute walk.

Current Off Licences near Proposed Premises	Walking Distance from Proposed Premises
Who's Next, 6 Library Parade	1 minute (285ft)
Komoto Mini Mart 126 Craven Park Road	5 minutes (0.2mile)
Craven Park Off Licence, 102 Craven Park	4 minutes (0.2mile)
Corner Road Shop, 98 Craven Park Road	3 minutes (0.2mile)
Supersave, 68 Craven Park Road	2 minutes (430ft)
PS Drinks, 43 Craven Park Road	1 minute (240ft)
Tamariz Deli, 24 Craven Park Road	1 minutes (75ft)
Housewives Cash & Carry, 14 Craven Park Road	1 minutes (217ft)
Shady's, 164 Manor Park Road	1 minute (190ft)
Beers, Wines & Spirits, 21 High Street	3 minutes (0.1mile)
Poziomka, 30-32 High Street	3 minutes (0.1mile)
Way 2 Save, 37-41 High Street	4 minutes (0.2mile)

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.

Premises Licence Application

Operational Plan, Training Manual & Conditions.

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 a crime hot spot. In this case, the applicant has provided general details on they intend to uphold the licensing objectives.

Safeguarding the Local Area

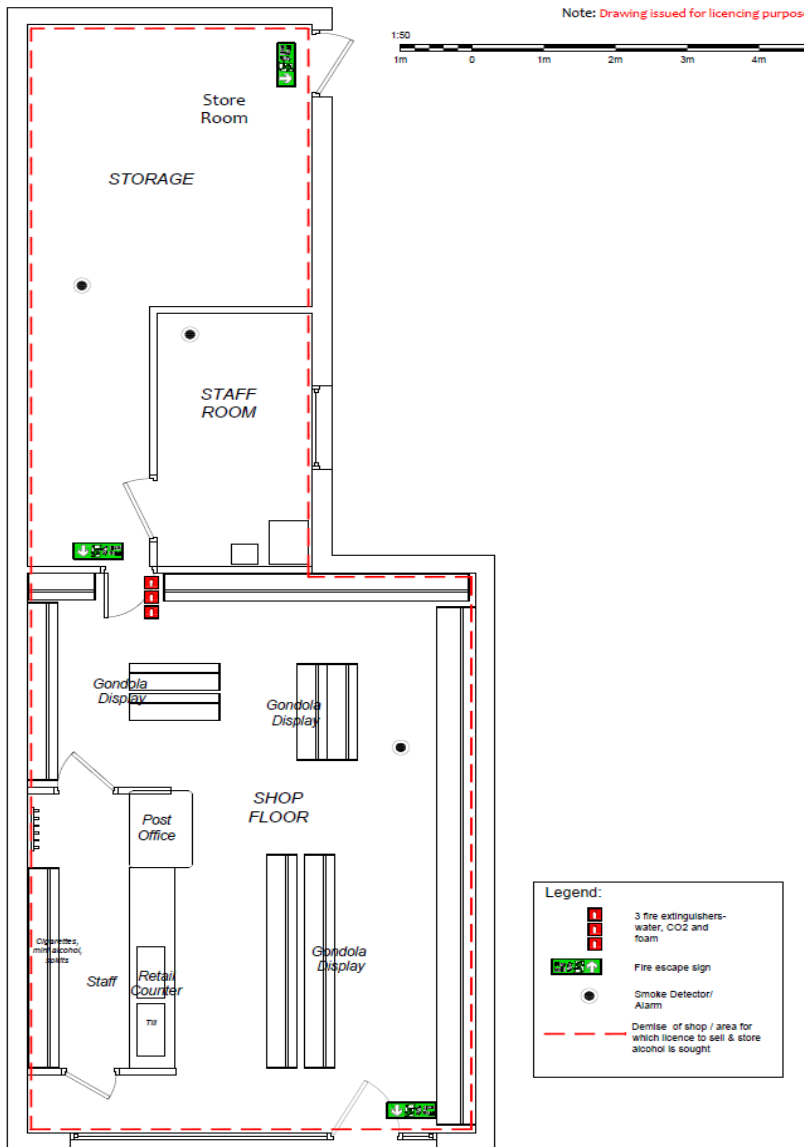
The Statement of Licensing Policy lists considerations to be made when applying for a new premises licence, particularly those considerations relating to street drinking.

However, there are no specific conditions that are mentioned in the application 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.

As per Brent Council's Statement of Licensing Policy, a voluntary offering of a ban on high strength alcohol sales does not necessarily address the requirements under a Cumulative Impact Zone.

The Plan

The plan appended to the application for a new premises licence indicate a traditional off licence layout.



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Pavement

On the Monday 24 June 2024, I spoke with the applicant and proposed DPS, Sathiaselvan Easwarakumar via telephone to obtain further information related to the application.

The following questions were asked and recorded below:

Esther Chan (LA): Have you take over the premises?

Sathiaseelan Easwarakumar(LH/DPS): Solicitors have exchanged details, lease is in place for 20 years. Intend to sign the documents by 28 June 2024. This shop will have to run as a local post office / convenience store.

Esther Chan (LA): When do you intend to take over the premises?

Sathiaseelan Easwarakumar(LH/DPS): If I sign the lease by 28 June 2024, I intend to open the shop within a month, most likely beginning of August 2024.

Esther Chan (LA): Who pays the Business Rates?

Sathiaseelan Easwarakumar(LH/DPS): I will pay the business rates.

Esther Chan (LA): Did you read the application and happy with the content?

Sathiaseelan Easwarakumar(LH/DPS): I am happy with the content. I was told not to sell minatures.

Esther Chan(LA): Are you aware that the premises fall in a CIZ and do you know what that means?

Sathiaseelan Easwarakumar(LH/DPS): Yes, high alcohol consuming area. We need to be very responsible for selling alcohol.

Esther Chan (LA): Can you explain any specific ASB issues near the premises?

Sathiaseelan Easwarakumar(LH/DPS): Most people want to drink. There could be incidents and calls to the police.

Esther Chan (LA): There are many existing off licences in local area, why do you want to open another off licence?

Sathiaseelan Easwarakumar(LH/DPS): The alcohol is for customers that come to the post office to buy convenience goods.

Esther Chan (LA): Do you intend to sell high strength beers, ciders and lagers over 6% abv?

Sathiaseelan Easwarakumar(LH/DPS): If is restricted then I wouldn't sell.

Esther Chan (LA): When did you undertake a personal licence course?

Sathiaseelan Easwarakumar(LH/DPS): Back 2014/2015.

Esther Chan (LA): Explain the 4 licensing objectives?

Sathiaseelan Easwarakumar(LH/DPS): I don't know by heart.

Esther Chan (LA): Can you explain the age verification policy that you intend to adopt?

Sathiaseelan Easwarakumar(LH/DPS): If anyone looks under 25, we will challenge age.

Esther Chan (LA): What steps will take to prevent public nuisance?

Sathiaseelan Easwarakumar(LH/DPS): Make sure no one is loitering outside. If they stay around then we will not sell to them, CCTV monitoring, install inside and outside. Im not sure, I'm new to the area and will see if I need to employ another peron.

Esther Chan (LA): Do you know about Public Space Protection Order in Brent?

Sathiaseelan Easwarakumar(LH/DPS): No.

Esther Chan (LA): How staff will you employ?

Sathiaseelan Easwarakumar(LH/DPS): At least 2 staff at all times.

Esther Chan (LA): What will be responsible for the training?

Sathiaseelan Easwarakumar(LH/DPS): I will be training them.

Esther Chan (LA): If the application is refused, will you keep the lease and continue to trade?

Sathiaseelan Easwarakumar(LH/DPS): We will not be able to survive with post office income. We intend to do long opening service.

Esther Chan (LA) – Do you experience running an off licence?

Sathiaseelan Easwarakumar(LH/DPS): I have another four off licences with post office service

Esther Chan (LA) – What sort goods and services will you provide at the premises?

Sathiaseelan Easwarakumar(LH/DPS): Post office, banking, lottery, maybe oyster and convenience goods

Based on my conversation with the applicant, I am not entirely confident that he is fully aware of the area's status as an Anti-Social Behaviour (ASB) hotspot. While I appreciate the applicant's intention to introduce numerous services to the community and willingness to accept proposed conditions from respective responsible authorities, the proposed business model lacks distinctiveness.

Regarding the measures he plans to implement to meet the licensing objectives stated in the application form, there appears to be an expectation for his staff to engage with the public if they observe customers loitering.

Given the area's challenges and the high saturation of off-licences in close proximity, I am uncertain about the viability of this approach, particularly with only two staff members managing the shop at any given time.

There is nothing to suggest that the premise will offering any niche products other than typical goods you would expect to find at an local off licence baring in mind, there are many existing grocery and off licence premises located in the area.

Harlesden is a challenging area of the Borough fuelled with anti social behaviour including street drinking, therefore adding another off licence in the area will not benefit the wider community in my opinion.

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.

The 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 additional off licence to the eight that already exist in the immediate area, will no doubt be detrimental to the local area.

If the committee however decide that there is sufficient evidence to the contrary, the Licensing Authority would ask that the following conditions be added to the operating schedule:-

The Licensing Authority require the following points to be included in the operating schedule or added as conditions on the premises licence:

1. 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.
2. 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.
3. A CCTV camera shall be installed to cover the entrance to the premises and further cameras to cover the entire servery area and till.
4. A member of staff shall always be present on the premises whilst they are open who is capable operating the CCTV system and able to facilitate immediate viewing of CCTV footage upon the request of the Police and Authorised Officer of the Licensing Authority.
5. A "Challenge 25" policy shall be adopted and adhered to at all times.
6. A sign stating "No proof of age – No sale" shall be displayed at the point of sale.
7. 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.
8. Any staff directly involved in selling alcohol for retail to consumers, staff who provide training and all managers will undergo regular training (every 12 months) 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.
9. Outside of the hours authorised for the sale of alcohol, all alcohol within the trading area is to be secured behind locked grills, locked screens or locked cabinet doors so as to prevent access to the alcohol by customers or staff.
10. All alcoholic drinks shall be clearly labelled or marked with the name of the premises.
11. A notice asking Customers to leave quietly from the premises shall be displayed by the exit/entrance.

12. A single 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:

- (a) all crimes reported to the venue
- (b) all ejections of patrons
- (c) any complaints received
- (d) any incidents of disorder
- (e) all seizures of drugs or offensive weapons
- (f) any faults in the CCTV system
- (g) any refusal of the sale of alcohol
- (h) any visit by a relevant authority or emergency service.

13. No high strength beers, lagers, and ciders above 6% ABV shall be stocked or sold at the premises.

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

15. No miniatures (5cl or 50ml) to be sold.

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

17. All deliveries shall take place during the normal working day (i.e. 09:00 to 18:00 daily).

18. A lockable safe with deposit slot and anti-fishing mechanisms must be used at the counter till area in order to prevent crime.

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

20. A personal licence holder shall be present on the premises and supervise the sale of alcohol throughout the permitted hours for the sale of alcohol.

21. All alcoholic drinks shall be clearly labelled or marked with the name of the premises.

22. An electronic till prompt should be used for all alcohol sales.

23. The premises shall be staffed by a minimum of two persons at all times.

Supply of Alcohol (Changed)

Monday to Sunday – 10:00hrs to 23:00hrs

Opening Hours (No Change)

Monday to Sunday – 07:00hrs to 23:00hrs

Yours faithfully



Esther Chan



**METROPOLITAN
POLICE**

Working together for a safer London

TERRITORIAL POLICING

**Craven Park Local
28, Craven Park Road
Harlesden
NW10 4AB**

Your Ref: 31929

Our ref: 01QK/391/24/3122NW

NW BCU Licensing Department - Brent

Harrow Police Station
74, Northolt Road
Harrow
HA2 ODN

Tel: 07500 087 115

Email: Phil.S.Graves@met.police.uk

Web: www.met.police.uk

Date: Saturday 22nd of June 2024

Police representations to the application for a new Premises Licence for 'Craven Park Local, 28 Craven Park Road, Harlesden NW10 4AB'

Police certify that we have considered the application shown above and 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.

**Officer: PC Phil Graves
Licensing Constable 3122NW**

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 new premises licence under section 17 of the Licensing act 2003. The Police representations are concerned with all four of the licensing objectives, namely:

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

The Application

The application is for a new section 17 Premises License for an off license wishing for the sale of alcohol from 07.00 hours to 23.00 hours seven days a week. The venue is Craven Park Road which falls into the Harlesden Cumulative Impact Zones (CIZ). CIZ's were created by Brent council to combat crime, street drinking and ASB in the worst parts of the borough. Below is a link to the council's CIZ.

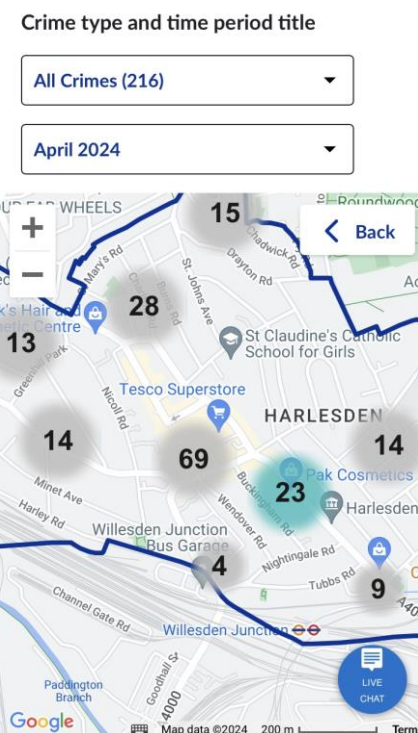
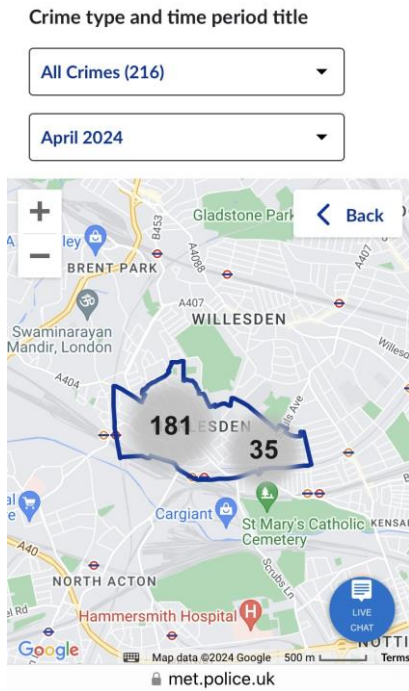
<https://www.brent.gov.uk/business/licences-and-permits/alcohol-club-and-entertainment-licences/premises-licence#ciz>

As you can see from the link there is an assumption that any new off license application will be refused unless the applicant can demonstrate that their venue would not have a negative effect on

the licensing objectives. I have read through the application which makes no reference to the CIZ even though an e-mail chain from the council clearly highlights that the venue falls within one.

“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.”

Below is a screen shot from the Met Police website for the NW10 4AB post code. As you can see this area has a total of 216 listed crimes a majority of which are in Craven Park Road.



These crimes are based around violence, sexual offences and public order issues quite often generated by excessive alcohol consumption.

Below is a list of venues in Craven Park Road with off sales as their main licensable activity. As you can see Craven Park Road is already saturated with Off Licenses. The list below does not include restaurants and nights clubs all of which sell alcohol.

Corner Shop	98, Craven Park Parade	Off License
Craven Park Off License	102, Craven Park Road	Off License
Housewife Cash & Carry	14, Craven Park Road	Wholesalers
Kotoko Mini Market	126, Craven Park Road	Convenience Store / Off License
Metro Supermarket	72, Craven Park Road	Convenience Store / Off License
Save Food and Wine	46, Craven Park Road	Convenience Store / Off License
Tamirez Deli	24, Craven Park Road	Convenience Store / Off License
The Liquor Store	43, Craven Park Road	Off License
Who's Next Food & Wine	6, Library Parade	Off License
New Atlas Café	69-71 Craven Park Road	Café / Off License
Surpesave	68, Craven Park road	Convenience Store / Off License

Adding another bog standard Off License to this area is not required. Doing this will just add to the ASB, street crime and public nuisance. Police are of the opinion that allowing this application to go ahead will be detrimental to all four of the licensing objectives Prevention of crime and disorder, public nuisance, public safety and the protection of children. Therefore police oppose this application in full.

Yours Sincerely,

PC Phil Graves 3122NW
NW BCU - Brent Licensing
Philip.Graves@met.police.uk

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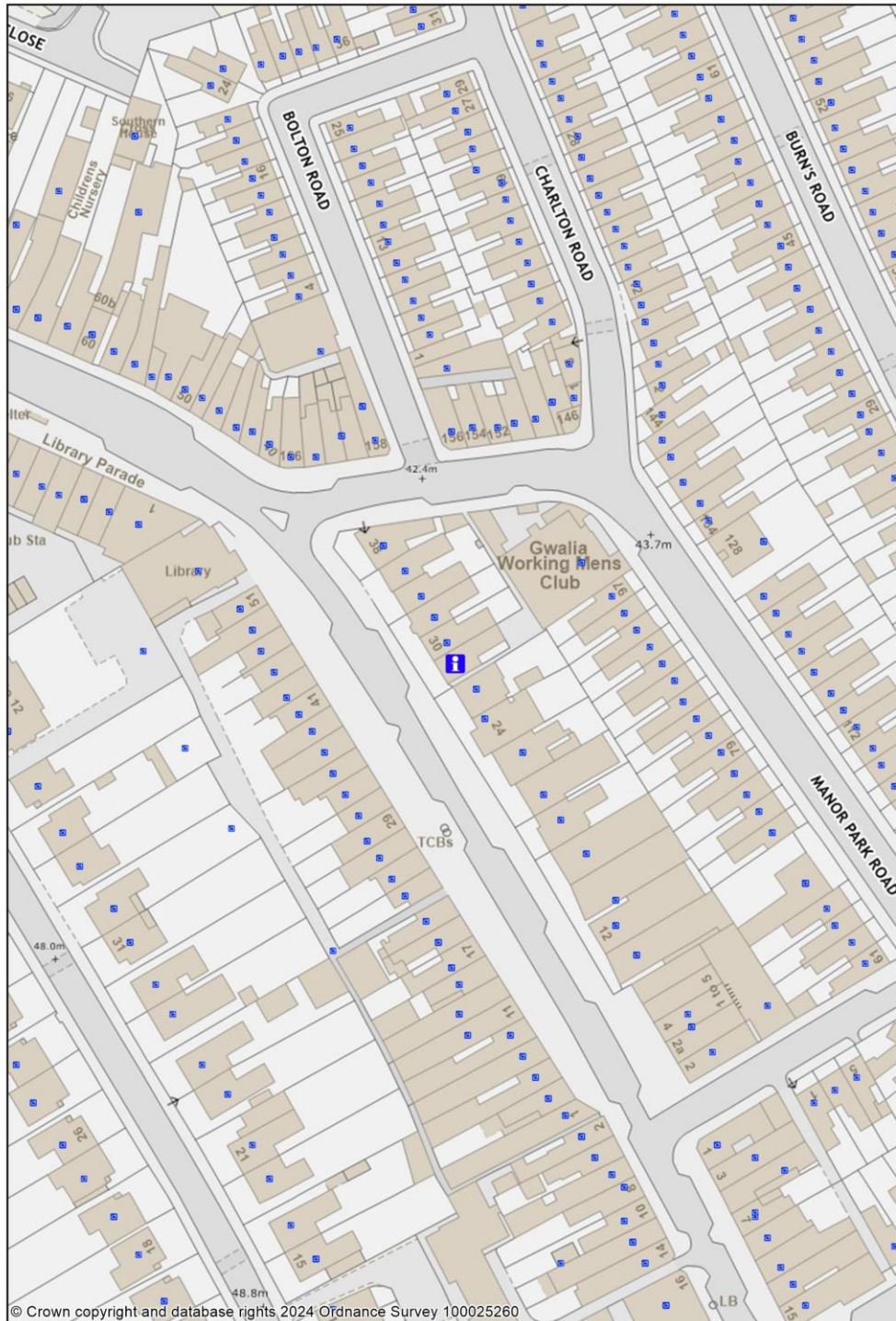
[REDACTED]

I also wish to make a representation against this application on licensing objectives of the prevention of crime and disorder, public safety and the prevention of public nuisance. The location is within Harlesden's CIZ yet the applicant makes no reference to this indicating he has no understanding of the area. Craven Park Rd was designated as a CIZ due to the ongoing and significant alcohol related crime and anti-social behaviour which is having an adverse impact generating complaints from residents, councillors and the Police. This is undermining the licensing objectives. In addition, it has potential to undermine the vitality of Brent's town centres. Where an application for a new off-licence is received, 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.

It is noted that Police and Licensing representations were made to a similar off licence at Newsfare 33 Craven Park Road, London, NW10 8SE which resulted in a refusal at committee 3 Oct 2023. The street drinking problems on Craven Park Road have not improved and there is no good reason why the availability of alcohol should be further increased. In the unlikely event that a licence is granted it should be conditioned to include Brent's Minimum Unit Pricing of 70p per unit as agreed in the Statement of Licensing Policy

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Basemap Map



1:1250

0 0.02 0.04 kilometres



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