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Alcohol and Entertainment Licensing Sub-Committee

Monday 12 January 2026 at 10.30 am

Boardrooms 1&2 - Brent Civic Centre, Engineers Way, Wembley HA9 0FJ

Please note that this meeting will be held in person with members of the Sub-Committee required to attend in person.

The press and public are also welcome to attend this meeting in person. Please note the meeting is not scheduled for live webcast

Membership:

Hylton

Members Substitute Members:

Councillors: Councillors:

Ahmed (Chair) Akram, Bajwa, Chohan, Mahmood, Maurice, L.

Long Smith, Clinton

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:

<u>Council meetings and decision making | Brent Council</u>



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 of 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 a New Premises Licence by Mr Sathiaseelan 1-30 Easwarakumar for the premises known as Craven Park Local, 28 Craven Park Road, NW10 4AB, pursuant to the provisions of the Licensing Act 2003



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:	The Licensing Guys – Nick Semper	

The application is for a new premises licence as follows:

The supply of alcohol and to remain open from 7am to 10pm 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 separate page.

4. Relevant Representations

Representations have been received from The Licensing Police, Licensing Officers, and the Ward Councillor

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 Kelcher Rep
- E. OS Map



Regulatory Services Brent Civic Centre Engineers Way Wembley HA90FJ

TEL: 020 8937 5359

EMAIL: bnsiness.licence@brent.gov.uk

WEB: www.brent.gov.uk

Online **Ref.** No: 20663 Application No: 36684 Date: 14 November 2025

LICENSING ACT 2003
Licence:Premises Licence New Application
Application No: 36684

Dear Sir/Madam,

Applicant:Mr Sathiaseelan Easwarakumar

Date Received: 13 November 2025

An application was made to Brent Council under the Licensing Act 2003 by the above-named applicant. 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:11 December 2025.**

Yours faithfully

SimaNaran Administration 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, NWIO 4AB

Telephone Number at premises (if any): 07863900903

Non domestic rateable value: 19250

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Section J: Sale or Supply of Alcohol: Off the premises			
<u>Day</u>	Start Time	End Time	
Monday	07:00	22:00	
Tuesday	07:00	22:00	
Wednesday	07:00	22:00	
Thursday	07:00	22:00	
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Sunday	07:00	22:00	

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Sunday	07:00	22:00

Nil

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Proposed Operating Schedule

28 Craven Park Road, HARLESDEN, NW10 4AB

1. PREVENTION of CRIME & DISORDER

CCTV:

CCTV will be provided in the form of a recordable system, capable of providing pictures of EVIDENTIAL QUALITY in all lighting conditions, particularly facial recognition. Cameras shall encompass all ingress and egress to the premises, fire exits, outside areas, and all areas where the sale/ supply of alcohol occurs.

A monitor shall be mounted on the wall at the premises where it is clearly visible to all members of the public. The monitor shall show the live CCTV footage being recorded.

Equipment MUST be maintained in good working order, be correctly time and date stamped.

Recordings MUST be kept in date order, numbered sequentially and kept for a period of 31 days and handed to Police on reasonable request.

The Premises Licence Holder must ensure at all times a DPS or appointed member of staff is capable and competent at downloading CCTV footage in a recordable format to the Police/Local Authority on reasonable request

The Recording equipment and tapes/discs shall be kept in a secure environment under the control of the DPS or other responsible named individual.

An operational weekly log report must be maintained endorsed by signature, indicating the system has been checked and is compliant, in the event of any failings actions taken are to be recorded.

In the event of technical failure of the CCTV equipment the Premises Licence holder/DPS MUST report the failure to the Police on contact number 101 as soon as reasonably practicable.

INCIDENT LOG:

An incident log must be kept at the premises, and made immediately available on request to an 'authorised person' (as defined by Section 13 of the Licensing Act 2003) or the Police, which must record the following:

- (a) all crimes reported to the venue
- (b) all ejections of patrons
- (c) any complaints received relevant to the Licensing Objectives
- (d) any incidents of disorder
- (e) any recovered drugs or offensive weapons
- (f) any faults in the CCTV system or searching equipment or scanning equipment

- (g) any refusal of the sale of alcohol
- (h) any visit by a relevant authority or emergency service

STAFF TRAINING:

All serving staff engaged in the sale of alcohol to be trained in Responsible alcohol retailing to the minimum standard of Responsible Alcohol Retailing Training - Level 1 or any other equivalent recognised training. This training shall include training on refusing sales to drunken persons, vulnerability and proxy sales.

Training records shall be kept on the premises and shall be produced to the police or an 'authorised person' (as defined by Section 13 of the Licensing Act 2003) or an authorised Trading Standards the Council on demand.

There sha;; be no sales of miniature bottles of spirits.

There shall be no single sales of cans of beer, cider or lager

There shall be no sales of cans or of beer, cider or lager exceeding 5.5% ABV.

2. PUBLIC SAFETY

All requirements and responsibilities pertaining to the lawful and responsible operation of the premises covered by primary legislation, will be complied with – e.g. building regs, health and safety, food labelling and fire prevention.

3. PREVENTION of PUBLIC NUISANCE

GOOD NEIGHBOURLINESS:

Noise or vibration shall not emanate from the premises so as to cause a nuisance to neighbours or residents.

Prominent, clear and legible signage shall be displayed at all exits to the premises requesting the public to respect the needs of local residents and to leave the premises and the area quietly.

4. PROTECTION of CHILDREN from HARM

AGE VERIFICATION

The premises shall operate Challenge 25.

Prominent, clear and legible signs shall also be displayed at all entrances to the premises as well as at, at least one location behind any counter advertising the scheme operated.

REFUSAL REGISTER

A written register of refusals will be kept including a description of the people who have been unable to provide required Identification to prove their age. Such records shall be kept for a period of 12 months and will be produced to the police or authorised officer of the Council on demand.

The only acceptable form of identification shall be a Passport, Photo Driving Licence or Proof of Age Standard Scheme card carrying the PASS hologram.

ALCOHOL SALES - ONLINE or via APP:

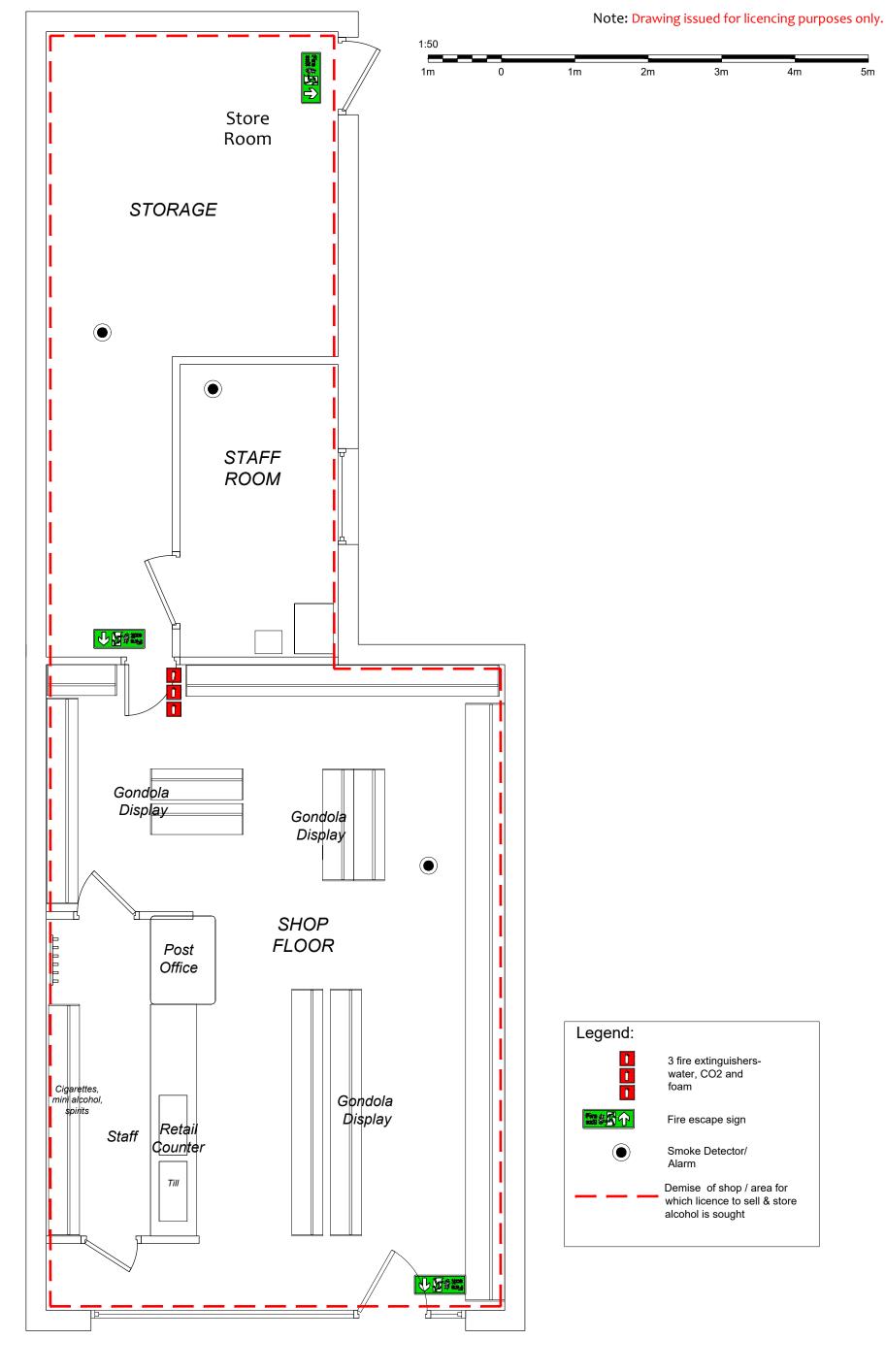
All sales of alcohol arising from an online order for delivery must be paid for, at the point of ordering, by credit or debit card.

The delivery of alcohol shall be made only to a residential or business address and to a customer ordinarily resident or employed at the address. Challenge 25 must be applied. Orders will not be accepted or completed to any person in a public place (for example a street corner, park or bus stop).

Where a third-party courier is used to supply alcohol, only reputable courier services will be utilised and they must provide an age verification service or adopt a policy of checking age and ID at the time of delivery.

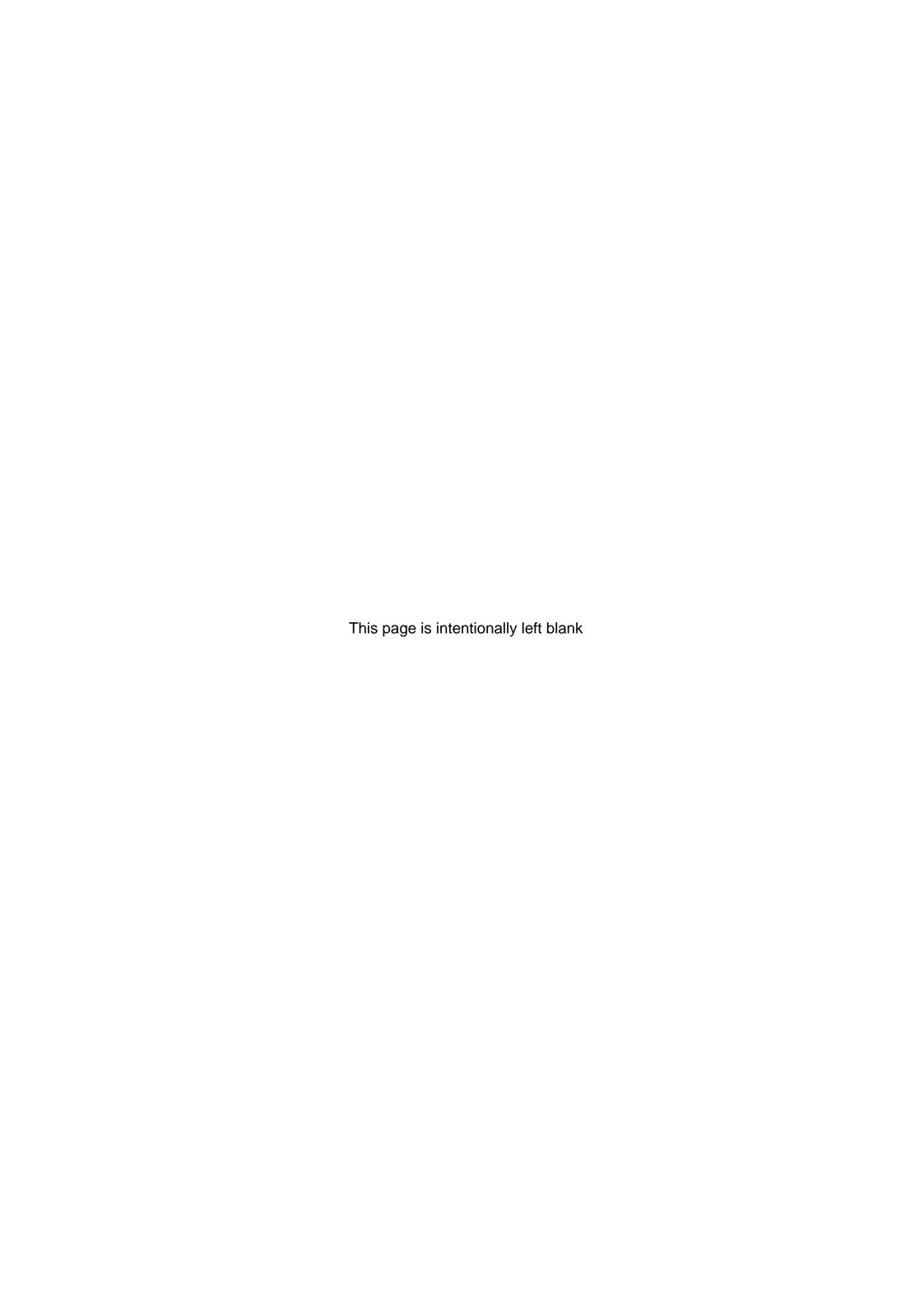
The courier must ensure that any order containing alcohol is received by a person over 18 years of age and measures must be in place for the refusal of delivery of items containing alcohol where no person over 18 years of age is able to receive the order.





Pavement

Pavement





Working together for a safer London

TERRITORIAL POLICING

Craven Park Local Mr Easwarakumar 28, Craven Park Road Harlesden NW10 4AB

Your Ref: 36684

Our ref: 01QK/689/25/3122NW

NW BCU Licensing Department - Brent

Wembley Police Station 603, Harrow Road Wembley HAO 2HH

Tel: 07500 087 115

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

Date: Saturday 6th December 2025

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 22.00 hours seven days a week. The venue is Craven Park Road which falls into the Harlesden Cumulative Impact Zones (CIZ). CIZ's where 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.

"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."

An almost identical application was submitted by Mr Easwarakumar in June 2024. This application was quite rightly refused by the subcommittee. Reading this current application and the last I see no real difference between the two, for example: -

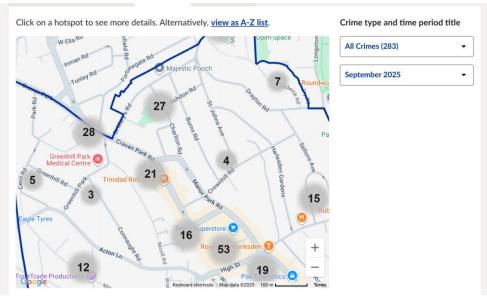
- (i) The applicant is still asking for the sale of alcohol from 07.00 hours in a designated CIZ
- (ii) The venue makes no reference to a specialised theme, leaving the presumption that this is another bog standard off-license.
- (iii) The application refers that it is 'unlikely to add to cumulative impact already experienced in the area'. This statement acknowledges the area is suffering from crime and ASB but can only state that it is 'unlikely' to add to the existing problems.

The crime figures are similar to those of the last application, very high with ASB, violence and sexual assaults making up the majority of the figures. These crimes are typically fuelled by alcohol, which is one of the main purposes of the CIZ which is trying to lower the sale of alcohol and lower the crime figures in an area already suffering from a high crime rate.

The crime figures below are taken from the Met Police web page for September 2025. As per June 2024 the crime figures are still very high. If you look at the last image (zoomed in shot of Craven Park Road) you can see that the majority of the crime are all based around Craven Park Road where the CIZ quite rightly exists







Below is a list of off licenses in the immediate vicinity. As you can see there is already an ample supply of shops supplying alcohol to the community. The list below only shows off licenses, with no restaurants included.

Corner Shop 98
Craven Park Off License 10
Housewife Cash & Carry 14
Kotoko Mini Market 12
Tamirez Deli 24
The Liquor Store 43
Who's Next Food & Wine 6,
New Atlas Café 68
Surpesave 68

98, Craven Park Parade 102, Craven Park Road 14, Craven Park Road 126, Craven Park Road 24, Craven Park Road 43, Craven Park Road 6, Library Parade 69-71 Craven Park Road 68, Craven Park road Off License
Off License
Wholesalers
Convenience Store / Off License
Convenience Store / Off License
Off License
Off License

Café / Off License Convenience Store / Off License

Summary

- (i) This appears to be an almost identical application that was refused by the subcommittee, to that submitted by Mr Easwarakumar in June 20024.
 - (ii) The venue falls within a CIZ
 - (iii) This is a standard off license offering no special theme.
 - (iv) The applicant wants to sell alcohol from 07.00 hours in a CIZ
 - (v) There is already a very high crime and ASB rate in the area.
 - (vi) There are already more than enough off licenses in the area supply alcohol to the community.

Due to the above police oppose this application in full regardless of what stringent conditions could be added to the premises license. Failing to object to this application would undermine all four of the licensing objectives.

Yours Sincerely,

PC Phil Graves 3122NW NW BCU - Brent Licensing Philip.Graves@met.police.uk From: The Licensing Guys [Licensing]

Sent: 06 December 2025 13:22

To: Phil.S.Graves

Cc: Business Licence; Legister, Linda <

Subject: Re: New Premises - Craven Park Local, 28 Craven Park Road, NW10 4TH -

36684 - Police Reps

Hi Phil,

Thanks for early sight of your Rep.

Are there any Conditions we can offer to address your concerns?

Nick S for TLG





Brent Civic Centre Engineers Way Wembley HA9 0FJ

TEL 020 8937 2928

EMAIL rhea.vagarwal@brent.gov.uk

WEB www.brent.gov.uk

Mr Nick Semper TL Guys Ltd PO Box 303 Llanymynech Shropshire SY10 6FE

09 December 2025

Our Ref: 36684

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)

In 2022, Brent Council reviewed its Cumulative Impact Policy after assessing crime data from various sources. This led to the implantation of the Cumulative Impact Zones (CIZs) in specified areas within Brent, as outlined in the latest Statement of Licensing Policy (2025 – 2030).

Evidence shows a strong correlation between concentrations of off-licences and incidents of alcohol related anti-social behaviour, particularly associated with street drinking.

The significant and notable increase in alcohol related crime and anti-social behaviour is having an adverse impact in some of the areas and neighbourhoods which generates complaints from esidents, councillors and the Police. This undermines the licensing objectives and also has potential to undermine the vitality of Brent's town centres.

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.

<u>Harlesden</u>

Harlesden town centre consists of multiple parades of shops that run along Craven Park Road, Park Parade and High Street, Harlesden.

The Statement of Licensing Policy describes the area as a hotspot for alcohol flagged calls to the Police for crime, anti-social behaviour and street drinking. Recent data shows the entire 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.

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/sexual.

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 is located at 28 Craven Park Road, NW10 4AB within a ground-floor commercial unit beneath a residential block of flats, along a parade of shops that include existing off-licenes and food-led businesses

The town centre falls between, Harlesden and Kensal Green ward and is one of the most deprived areas in the borough. A number of existing off licences are also 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	6 minutes (0.3mile)
Corner Road Shop, 98 Craven Park Road	4 minutes (0.2mile)
Supersave, 68 Craven Park Road	2 minutes (430ft)
PS Drinks, 43 Craven Park Road	1 minute (246ft)
Tamariz Deli, 24 Craven Park Road	1 minutes (79ft)
Housewives Cash & Carry, 14 Craven Park Road	1 minutes (98ft)
Shady's, 164 Manor Park Road	1 minute (194ft)
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 it is an offence if a person fails to comply with a request to cease drinking alcohol by an authorised officer.

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. If off licences did not exist, the number of street drinkers would decline.

Consultation visit:

A visit was conducted to the premises in respect to the new application on Friday 28 November 2025 at approximately 11:00hrs.





The premiss plan indicates a traditional off-licence layout which also provides the service of a post office.

The applicant and proposed DPS, Mr Sathiaseelan Easwarakumar, was not present at the time of my visit however, we spoke over a telephone call and arranged a subsequent telephone appointment to discuss the application in more detail.

Discussion with applicant:

On Thursday 4 December 2025, I spoke with Mr Sathiaseelan Easwarakumar via telephone whereby the following questions were asked and recorded below:

- 1. Rhea Vagarwal (LA): Did you read the application and are you happy with the content? Sathiaseelan Easwarakumar (LH/DPS): Yes.
- 2. **Rhea Vagarwal (LA):** Are you aware the premises falls within a CIZ, and do you know what that means?
 - **Sathiaseelan Easwarakumar (LH/DPS):** Yes, I do. I have other shops under the same zone in Burnt Oak with Barnet Council which I got last year.
- 3. **Rhea Vagarwal (LA) –** What has changed in this new application compared with the one that was refused last year?
 - **Sathiaseelan Easwarakumar (LH/DPS):** Nothing was concrete last time; I didn't have any lease on my name or post office contract. Now I have been running for last 1 year and I have no issues with the community.
- 4. Rhea Vagarwal (LA) What new or strengthened measures are you proposing to promote the licensing objectives and ensure that no further cumulative impact is caused? Sathiaseelan Easwarakumar (LH/DPS): There are other issues such as drugs that I am aware of, but I will be compliant with all the licensing objectives...no single cans or miniatures so it leads to cutting down people drinking on the street. When a customer comes and asks, we will turn them back and say we don't have.

- 5. Rhea Vagarwal (LA): Can you list the 4 licensing objectives?

 Sathiaseelan Easwarakumar (LH/DPS): Prevent of crime and disorder, public safety, prevention of public nuisance and protection of children of harm.
- 6. Rhea Vagarwal (LA): Do you know about Public Space Protection Order in Brent? Sathiaseelan Easwarakumar (LH/DPS): To help particular issues with local residents. Since we have taken over the shop, we had councillors that had concerns with parking, and we have controlled it.
- 7. Rhea Vagarwal (LA): There are many existing off licences in the local area, why do you want to open another off licence?

 Sathiaseelan Easwarakumar (LH/DPS): It's not purely selling alcohol. We want our customers to purchase all goods in one place to make it easier. This area on record might have crime but since I took over, I only had a break in with stolen cigarettes, but they are arrested now because we worked with Police.
- 8. **Rhea Vagarwal (LA):** If the application is refused, will you keep the lease and continue to trade?
 - **Sathiaseelan Easwarakumar (LH/DPS):** I am applying for a certain time because I am really keen to get more footfall and increase sales. I already told post office, they are giving it, I have amazon services now so I hope I can.
- 9. **Rhea Vagarwal (LA):** During my visit on Friday 28 November 2025, I observed two males who appeared to be intoxicated enter the premises. If the application was to be granted, how would you manage intoxicated individuals entering the premises to purchase more alcohol?
 - **Sathiaseelan Easwarakumar (LH/DPS):** They aren't allowed to drink. And we won't sell alcohol to them. I don't have issues in the last 1 year.

Based on my conversation with applicant, Mr Easwarakumar has demonstrated some understanding of the area profile. Whilst 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.

Summary

The Statement of Licensing Policy stipulates that any new premises licence application falling within a specified Cumulative Impact Zone will not be granted unless the applicant provides compelling evidence that the proposed licensable activities will not contribute to the issues the CIZ seeks to address, such as street drinking and alcohol-related anti-social behaviour.

Whilst a business plan has been provided, it fails to demonstrate that granting this application would avoid negative cumulative impact on one or more of the licensing objectives and to the contrary, add to the issues of an existing saturated area.

There is nothing to suggest that the premises will be offering any niche products other than typical goods you would expect to find at a local off licence bearing in mind, there are many existing grocery and off licenced premises within the vicinity.

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. 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 however, if the Sub-Committee decides that there is sufficient evidence to the contrary, the Licensing Authority would request the following points be included in the operating schedule or added as conditions on the premises licence:-

- 1. The premises shall operate and maintain a digital colour CCTV system. The CCTV system shall continually record whilst the premises are open for licensable activities, and all recordings shall be kept for 31 days.
- 2. The CCTV system shall capture clear images of every person entering or leaving the premises with further CCTV cameras covering the publicly accessible areas stipulated on the premises plan, including the frontage of the premises.
- 3. A member of staff trained in the use of the CCTV system shall be available at the premise at all times that the premises are open to the public. This member of staff shall be able to view, download and make copies of any CCTV requests made by the police or authorised officer(s).
- 4. CCTV footage shall be provided within 24 hours upon request by Police and any authorised Officers from Brent Council, in a readily accessible format on removable media (I.e., USB, hard drive, CD etc..) or via digital transfer.
- 5. The CCTV system shall display the correct date and time on any footage.
- 6. Signage stating that CCTV is in operation shall be clearly and prominently displayed at the premises.
- 7. A "Challenge 25" policy shall be adopted and adhered to. Acceptable proof of age shall include identification bearing the customer's photograph, date of birth and integral holographic mark or security measure. Suitable means of identification would include PASS approved proof of age card, photo-card driving licence and passport.
- 8. A notice stating "No proof of age No sale" shall be displayed at the point of sale.
- 9. A notice asking customers to leave quietly from the premises shall be displayed by the exit/entrance.
- 10. 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.
- 11. 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.

The training records shall detail:-

- a) Staff member's name
- b) Staff member's signature
- c) Name of person providing the training
- d) Date of training
- e) Training on the licensing objectives
- f) Training on use of the incident log

- g) Training on refusal of sale
- h) Training on challenge 25 policy
- i) Training on the use and downloading (providing copies) of the CCTV system

This training shall be kept at the venue and made available immediately upon request to the police or authorised officers from Brent Council.

- 12. 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:
 - a) all crimes reported to the venue
 - b) all ejections of patrons
 - c) any complaints received
 - d) any faults in the CCTV system
 - e) any visit by a relevant authority or emergency service

Any entries into the log shall be made within 24 hours of any incident and shall contain the time/date of the incident, the nature of the incident, a description of the people involved, the action taken and details of the person responsible for the management of the premises at the time of the incident.

13. A refusal book detailing date and time of the refused sale, the name of the person refusing the sale and a description of the person attempting to purchase alcohol, shall be kept and maintained and made available for inspection at the premises.

Any entries into the log shall be made within 24 hours of any incident and shall contain the time/date of the incident, the nature of the incident, a description of the people involved, the action taken and details of the person responsible for the management of the premises at the time of the incident.

- 14. All deliveries (to the premises) shall take place during the normal working day (i.e. 09:00 to 18:00 daily).
- 15. A clear and unobstructed view into the premises shall be maintained at all times.
- 16. There shall be no single cans or bottles of beer or cider shall be sold at the premises.
- 17. There shall be no miniatures of spirts or wine sold at the premises.
- 18. No high strength beers, lagers, and ciders above 6.0% ABV shall be stocked or sold.
- 19. There shall be no self-service of spirits on the premises with all spirits being located behind counter.
- 20. All alcoholic drinks shall be clearly labelled or marked with the name of the premises.
- 21. A suitable intruder alarm and panic button shall be fitted and maintained.
- 22. A personal licence holder shall be at the premises at all times whilst open for licensable activities.
- 23. The premises licence holder shall display notice warning customers against drinking on the street in line with Brent Council's Public Spaces Protection Order.

- 24. The premises licence holder shall ensure that all tills in operation at the premises automatically provide age-related prompts to staff to check the age of the buyer when alcoholic products are passed through the till, or entered onto the till, for sale.
- 25. A lockable safe with deposit slot and anti-fishing mechanisms must be used at the counter till area in order to prevent crime.
- 26. Drivers shall not deliver to any person anywhere other than that at the residential / business address given when the order was placed. There shall be NO deliveries made to any open/public spaces.
- 27. Delivery drivers should be asked to keep noise to a minimum when collecting deliveries and must not be permitted to loiter unnecessarily.
- 28. 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.

Supply of Alcohol (Changed)

Monday to Sunday - 10:00hrs to 22:00hrs

Opening Hours (No Change)

Monday to Sunday – 07:00hrs to 22:00hrs

Yours Sincerely

Rhea Vagarwal

Licensing Enforcement Officer

L. Vagarwat

Regulatory Services

From: Kelcher, Councillor Matt < Cllr. Matt. Kelcher@brent.gov.uk >

Sent: 24 November 2025 10:50

To: Business Licence <business.licence@brent.gov.uk>

Cc: Patel, Councillor Mili <Cllr.Mili.Patel@brent.gov.uk>; Chan, Councillor Jumbo

<Cllr.Jumbo.Chan@brent.gov.uk>

Subject: Representation Against Application 36684 – Harlesden Cumulative Impact

Zone

Dear Licensing Team,

I wish to make a formal representation against Application 36684 on the basis of all four licensing objectives, as the premises are located within the Harlesden Cumulative Impact Zone (CIZ), referred to by the applicant as the Cumulative Impact Assessment (CIA) area.

I am sure my co councillors in copy would join me in advocating for a refusal.

Grounds for Representation

1. Cumulative Impact Zone Policy

- The presence of a CIZ means that granting a new licence should only occur where the applicant can demonstrate in the operating schedule that they would not be adding to the cumulative impact.
- The applicant states that granting the licence would be "unlikely to add to cumulative impact already experienced in the area." This does not meet the policy requirement of "would not add impact." By their own admission, the applicant cannot guarantee zero additional impact, which is the standard required under the guidance.

2. Evidence from CIA and Local Issues

- Guidance under Section 182 states:
 "Anyone making a representation may base it on the evidence published in the CIA, or the fact that a CIA has been published."
- Craven Park Road, within the Harlesden CIZ, has a recognised problem with street drinking linked to drug dealing, driven by the high availability of alcohol from numerous outlets.
- At the most recent Safer Neighbourhood Ward Panel meeting on 19
 November, attended by residents, police, and councillors, street drinking on Craven Park Road was identified as one of the three ward priorities.

3. Public Safety and Crime Prevention

 Increased alcohol availability in an area already suffering from street drinking and associated crime will undermine efforts to reduce anti-social behaviour and drug-related activity.

4. Public Nuisance and Protection of Children

 Street drinking contributes to disorder and creates an unsafe environment for families and children in the area.

Policy and Decision-Making

If Brent Council decides to grant this licence, it must provide the applicant, the Chief Officer of Police, and all parties who made relevant representations with clear reasons for granting the application, including any reasons for departing from its own policy.

Given the existing situation on Craven Park Road and the applicant's inability to demonstrate compliance with the CIZ policy, I respectfully request that Application 36684 be refused.

Best wishes,

Matt

Cllr Matt Kelcher

Labour Councillor for Harlesden and Kensal Green Ward

Chair, Planning Committee

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