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**The Licensing Authority**

*Brent Civic Centre  
Engineers Way  
Wembley  
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HA9 0FJ*

**Your ref: 19188**

**Our ref: NW/213/20/2965**

**Brent Borough Licensing Department**

*Harrow Police Station  
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Harrow  
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**Date:** 10/07/2020

**Police representations to a New Premises Licence application for "Nishco Food & Wine, 319 Harrow Road, Wembley, HA9 6BA".**

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

**Police Officer: Gary Norton  
Licensing Team PC 2965NW**

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 act, in accordance with section 12 of the Licensing Act 2003.

Police licensing 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.

This application for "off" licence sales is of major concern to the police, as the premises sits right in one of ten areas in Brent deemed a "Cumulative Impact Zone" (CIZ). Brent Council Licensing Policy introduced CIZ's on 7<sup>th</sup> January 2020 in order to combat a rise in crime, disorder & public nuisance (such as ASB), with many instances being associated to alcohol use/abuse.

The premises itself is situated in a busy area comprising of similar types of off licence premises, pubs, bars and restaurant within the footprint of Wembley Stadium and stricter licensing control on event days. It has a heavy pedestrian and traffic footprint throughout the early morning into the evening, as it runs along the A404 close to the triangular junction with A479.

The conditions proposed by the applicant have little consideration given to the local area, certainly nothing exceptional in their nature to consider adding another "off" license premises to the CIZ.

The continued rise of crime and ASB fuelled by ongoing issues such as alcohol and drugs continues and Police have faced drastic financial cuts for the past ten years, resulting in a significant fall in

officer numbers. The Mayor of London recently announced further funding cuts of £110M. Now more than ever, we need strict controls put in place, such as CIZ protection, to prevent further increases in existing licensing issues. More reliance on sensible decisions about allowing licensed premises needs to take place, with better awareness and self-regulation from existing and future licence holders.

It is clear from the application that no real consideration has been given to alleviate licensing concerns over adding yet another “off” sales premises. Within a stone throws distance, there are already five “off” licence premises; and bars/pubs such as The Arch, Station 31 & The Corner House. Aside from CIZ concerns about the need for exemplary licensing planning on the applicants part to consider another “Off” licence, the area is often swamped on Wembley Stadium event days. Large numbers of football fans swamp the area, sometimes from the previous night or early mornings to make a “weekend” of it, leading to more ASB, noise nuisance, violent disorder and public drinking.

The hours of alcohol supply requested are wholly inappropriate for such as area. We have local schoolchildren who head into schools in the early mornings, such as St Joseph’s Catholic Junior School, very close by on Chatsworth Road, Elsley Primary School on Tokyngton Avenue or the Ark Elvin Academy on Cecil Avenue. The street drinker issues around Wembley could lead to children having to negotiate street drinkers wishing to take the edge off their addiction. Having sales of 0600hrs and finishing at 0100hrs when the shop closes is ludicrous to consider in a CIZ area. Worse still, the applicant wishes to stay open an extra hour, until 0200hrs, on Friday and Saturday.

I would ask why on these days until that time, other than to try to take advantage of the illicit night time trade from street drinkers who frequent the area? The location of the premises is close to recognised side roads such as Chatworth Road, Waverley Road, the small green area adjacent to The Arch premises and alley cut-through’s behind the shopping parades.

The latest figures for crimes in May 2020 for the two areas that the premises sits on Wembley Central and Tokngton amounted to 426 crimes: 194 related to ASB and 76 to violent & sexual crimes. These figures can be verified on Police.uk website.

There are many studies reflecting the relationship between alcohol consumption/abuse with increases in ASB and violent crimes, as highlighted by such organisations as the Institute of Alcohol Studies. There is also evidence that the most disadvantaged of socio-economic groups (as represented by some of the local populous) that they are disproportionately at risk of alcohol-related violence.

To increase the supply of alcohol to an area with plenty of existing choice and recognised serious social issues would clearly be detrimental, regardless of the intentions of the applicant to set an example. Taking into account of Police concerns and guidance related to CIZ’s given in the Brent Council guidance; 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.

Therefore, the Police licensing team oppose the granting of this premises licence.

Yours Sincerely,

**Gary Norton 2965NW**  
**Licensing Constable – Brent Police**