



**METROPOLITAN  
POLICE**

Working together for a safer London

## TERRITORIAL POLICING

### **Brent Police Licensing Unit**

Brent Civic Centre  
Engineers Way  
Wembley  
Middlesex  
HA9 0FJ

### **Brent Borough Licensing Department**

Harrow Police Station  
74 Northolt Road  
Harrow  
HA2 0DN  
**Tel:** 020 8733 4530  
**Email:** [nwmailbox.licensingbrent@met.police.uk](mailto:nwmailbox.licensingbrent@met.police.uk)  
**Web:** [www.met.police.uk](http://www.met.police.uk)

**Date:** 11/11/2020

**Your ref:** 20142

**Our ref:** 01QK/375/2158NW/20

**Police representation to the application for a new Premises Licence for Kanaga Mart Ltd, 755 Harrow Road, Wembley, HA0 2LW.**

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

I am of the opinion that the risk to the Council's licensing objectives can't be mitigated by simply requesting stringent conditions on the proposed licence. I request the application for a new premises licence be **refused**, for the reasons stated below.

Officer: Ally Darwood  
Licensing Officer 2158NW

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

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

The Police representations are primarily concerned with Crime & Disorder, and Public Nuisance.

Dear Sir/Madam,

On Friday 6th November 2020, we (Metropolitan Police, Brent Licensing) received an application for a Premises Licence under Section 17 of the Licensing Act 2003, the applicant being;

Mr Kanagaratnam Selvaratnam.

The application can be summarised as follows:-

Kanaga Mart Ltd has applied to be an off licence selling food and alcohol. Mr Selvaratnam has applied for a licence to sell alcohol (Off Premises) from;

**Sale of Alcohol:**

1100hrs - 2300hrs Monday to Sunday.

**Opening Hours:**

0700hrs - 2300hrs Monday to Sunday.

The application states the following;

- No high strength beers, single can or miniatures to be sold
- CCTV will be kept for 31 days and maintained
- Noise signage, and no loitering to be displayed
- Staff to be trained on Age restricted products

Regarding this Application it is important to note that Street Drinking is a serious and well documented problem in many areas of the borough of Brent. So much so that there have been a number of official measures put in place to restrict the supply and consumption of alcohol most pertinently:

**Cumulative Impact Zone (CIZ)**

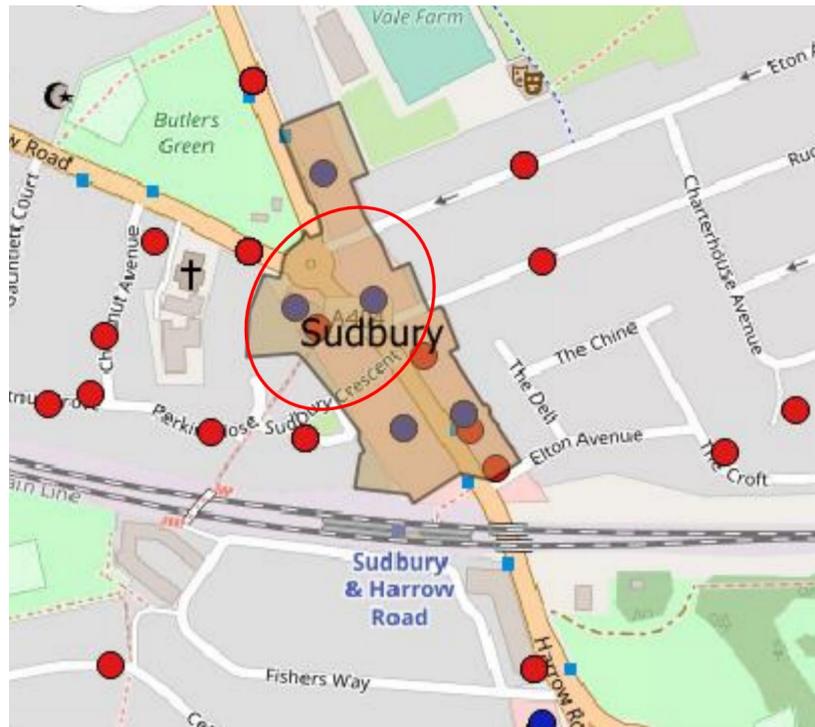
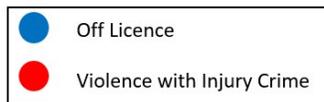
Sudbury Town Centre, Wembley has been identified as one of ten Cumulative Impact Zones (CIZs) in Brent, where the authorising of further licences may undermine the promotion of the licensing objectives.

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.

**Sudbury Town Centre, Wembley**

Sudbury Town Centre is a medium sized shopping parade in Wembley. Sudbury Town Centre is a hotspot for alcohol related calls to the Police for crime and anti-social behaviour. Calls are related to the area from the roundabout at Butlers Green, to the junction of Sudbury Crescent and along Harrow Road, where this proposed venue is situated.

The below map has been taken from Appendix B of the Brent CIZ Proposal, which shows a snapshot of violence with injury crimes, and off licences in the Sudbury CIZ and surrounding areas (01/06/2017 to 31/05/2019).



From a Police perspective, it is believed that any additional alcohol retailer within the Sudbury CIZ will add to the supply of alcohol to street drinkers and directly contribute towards the existing problem. An opportunity to reduce the supply of alcohol should be explored at every opportunity especially when the addition of a new premises would clearly exacerbate the problems being experienced already, highlighted in the stats below taken from Police.uk Crime Map. These following stats cover the area in September 2020.

Top reported crimes	
Most commonly reported crimes during Sep 2020	
Anti-social behaviour	51
Violence and sexual offences	29
Drugs	12
Other theft	10

The following map shows the locations of hotspots within the Sudbury CIZ, the '26' and '41' Hotspots fall on the location, and the immediate surroundings of the proposed off licence (HAO 2LW).



The following graphic is also taken from Police.uk and shows the crime rates per month in the area of the proposed off licence (HAO 2LW) averaging at approximately 120 crimes per month.



Below is a list of the crimes in the area of the proposed venue, evidenced in more detail, with redactions due to data protection. This list includes a snapshot of some of the crimes which have occurred in the last year. The types of crimes listed and the frequency that they occur can be attributed to, and are exacerbated by, the consumption of alcohol.

**Each of the below entries is within 3-5 minutes' walk from 755 Harrow Road, Wembley, HA0 2LW, taken from police indices from 01/01/2020 – 10/11/2020;**

04/11/2020 – 1800hrs – Public Order Offences – 1927###/20  
31/10/2020 – 1830hrs – Theft - 1927###/20  
18/10/2020 – 1130hrs – Theft - 1926###/20  
15/10/2020 – 1400hrs – GBH/Serious Wounding - 1925###/20  
25/09/2020 – 1100hrs – Theft - 1923###/20  
16/09/2020 – 0215hrs – ABH - 1920###/20  
23/06/2020 – 0300hrs – Public Order Offences - 1914###/20  
19/06/2020 – 1100hrs – Theft - 1915###/20  
18/06/2020 – 2005hrs – Criminal Damage - 1914###/20  
31/05/2020 – 1400hrs – GBH/Serious Wounding - 1913###/20  
20/05/2020 – 1430hrs – Theft - 1912###/20  
21/02/2020 – 1928hrs – Theft - 1905###/20  
09/02/2020 – 0300hrs – Public Order Offences - 1903###/20  
09/02/2020 – 0130hrs – Theft - 1903###/20  
19/01/2020 – 0130hrs – Common Assault - 1901###/20

On Wednesday the 11<sup>th</sup> November 2020 at 1225hrs, I contacted the applicants by telephone and asked Mr SELVARATNAM if he was happy to answer a few questions about the application, to which he responded yes, however when I asked questions, his wife, Mrs SELVARATNAM answered on his behalf with him next to her.

I asked the following questions relevant to the application, and recorded their replies;

PC DARWOOD: Do you know what a Cumulative impact zone / CIZ is?

**Mrs Selvaratnam: Yeah, it's a red zone**

PC DARWOOD: What does that mean to you?

**Mrs Selvaratnam: There is more than... selling... \*inaudible\***

PC DARWOOD: Could you say that again.

**Mrs Selvaratnam: Red zone**

PC DARWOOD: Okay I don't think you quite understand what it means, generally its an area that's been deemed to have a lot of crime and anti-social behaviour, and an area which already has a lot of shops that sell alcohol etc.

**Mrs Selvaratnam: okay**

PC DARWOOD: Do you have a solicitor?

**Mrs Selvaratnam: Yes I can get one**

PC DARWOOD: Will you be working at the store?

**Mrs Selvaratnam: Yes me and my husband**

PC DARWOOD: Are you and your husband Personal Licence Holders?

**Mrs Selvaratnam: Yes I am**

PC DARWOOD: How long have you been a PLH?

**Mrs Selvaratnam: I got it this week maybe two weeks ago**

PC DARWOOD: Okay great, can you tell me the 4 licensing objectives, what you know of them?

**Mrs Selvaratnam: Don't sell to under 18s**

PC DARWOOD: Yes that's part of one, protecting children from harm, can you tell me any others?

**Mrs Selvaratnam: Nuisance**

PC DARWOOD: Okay, what does that mean to you?

**Mrs Selvaratnam: Drunk people and disturbing the public**

PC DARWOOD: What will you be selling if you were to get your licence approved?

**Mrs Selvaratnam: Beer. Wine. Whiskey. All alcohols**

PC DARWOOD: And if your licence was not approved, what would you sell?

**Mrs Selvaratnam: Groceries, Red bulls, Juices**

PC DARWOOD: Do you think you could operate without alcohol sales?

**Mrs Selvaratnam: No. Business would be very low. I can't. It would be very bad.**

PC DARWOOD: What do you know of the Sudbury area, have you worked here before?

**Mrs Selvaratnam: I live in the area, three minutes' walk away from the shop**

PC DARWOOD: That's great, what is it like living there?

**Mrs Selvaratnam: Mess. Little bit dangerous**

PC DARWOOD: Why do you think that is?

**Mrs Selvaratnam: So many people around.**

PC DARWOOD: Okay, Do you have any questions for me?

**Mrs Selvaratnam: When will I hear about the application?**

PC DARWOOD: The council will contact you regarding the next steps.

Following the telephone conversation, I have concerns with the applicants' business plan for this premises. The applicants have a vague knowledge of the Licencing Objectives, however from the phone call I doubt their capability to uphold the objectives in practical application.

The applicants live in the area where the proposed shop will be situated and have admitted to the area being messy, crowded and dangerous. Despite this, when asked about what they will sell, they listed **all alcohols**. When asked if they could operate without alcohol the applicant has said, '**No. Business would be very low. I can't. It would be very bad.**' This would suggest the purpose of this application is to solely sell alcohol.

To re-iterate, this application, if granted, will directly contribute to the ongoing problems that the CIZ is in place to prevent. Sudbury in particular, cannot cope with another off-licence. The area is already completely saturated with similar venues. In such a small strip of shops there are **9 similar premises** (Lycamobile, Tesco, European Food, Sudbury Supermarket, Paneer Food & Wine, Everyday Food & Wine, Hamptons Food & Wine, Sudbury Town Post Office and Off Licence, Waterloo Food & Wine) within a 3 minute walk that all sell alcohol and that is **not including The Swan Public House and the several restaurants**, some of which also have the capacity for alcohol sales. The area will not benefit in the slightest from another off licence, it will be detrimental, and the temptation to provide lower cost alcohol in an attempt to undercut the plethora of competition will be extremely high.

Even with the strictest of conditions attached ANY additional supplier of alcohol within the Cumulative impact zone will be a direct contributor to crime and disorder and anti-social behaviour.

**I request that this application for a Premises licence at Kanaga Mart Ltd, 755 Harrow Road, Wembley, HA0 2LW be refused.**

**I do not believe there are any conditions that could be attached to the licence to negate the risk of the objectives being undermined. I accept the decision does not rest with me but with the committee. With that in mind, if the licence was granted I would ask for Licensable Activities and Opening Hours to be restricted and I would ask for the following conditions:**

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 licensing officers immediately upon request. A member of staff fully conversant with the use and operation of the CCTV system and how to provide footage to police or local authority requests shall be present throughout the permitted hours for sale of alcohol.
2. A CCTV camera shall be installed to cover the entrance of the premises and capture clear facial recognition images and a clear head and shoulders image of every person entering or leaving the premises. Suitable signage re the use of CCTV must be displayed.
3. A sign stating "No proof of age - No sale" shall be displayed at the point of sale
4. A "Challenge 25" policy shall be adopted and adhered to.
5. An incident/refusal book 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 details (including day, date, time, summary of incident) of any of the following:
  - all crimes reported to the venue
  - all ejections of patrons
  - any complaints received
  - any faults in the CCTV system
  - any refusal of the sale of alcohol including 'Off Deliveries/sales of alcohol'
  - any visit by a relevant authority or emergency service.
6. 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.
7. Any staff directly involved in selling alcohol for retail to consumers, staff who provide training and all managers will undergo regular training of Licensing Act 2003 legislation. This will be documented and signed for by the DPS and the member of staff receiving the training. This training log shall be kept on the premises and made available for inspection by police and relevant authorities upon request.
8. Promotions that encourage irresponsible drinking shall not be permitted.
9. A clear and unobstructed view into the premises shall be maintained at all times.
10. A suitable intruder alarm complete with panic button shall be fitted and maintained.
11. No high strength beers, lagers, and ciders above 5% ABV shall be stocked with the exception of premium beers.
12. 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

13. A minimum of two members of staff shall be present throughout the permitted hours for the sale of alcohol.

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

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

16. 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.

17. All alcoholic drinks shall be clearly labelled or marked with the name of the premise.

18. A notice asking Customers to leave quietly from the premises shall be displayed by the exit/entrance.

19. Invoices are to be produced to Police, or a member of an appropriate authority, upon request to evidence payment of duty on goods.

Yours sincerely,

Ally Darwood PC2158NW

Brent Licensing Police Team