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Alperton Stationary Shop  
200 Ealing Road  
Alperton  
HA0 4QG

8 March 2021

Dear Sir/Madam,

**Licensing Representation to the Initial Application for the Premises Licence at Alperton Stationary Shop, 200 Ealing Road, Alperton, HA0 4QG**

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

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

**The application has been made for a new premises licence under section 17 of the Act.**

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

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

**Cumulative Impact Zone (CIZ)**

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

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

The Statement of Licensing Policy states: -

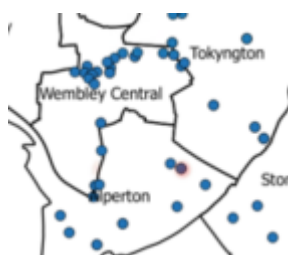
#### *'Ealing Road*

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

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

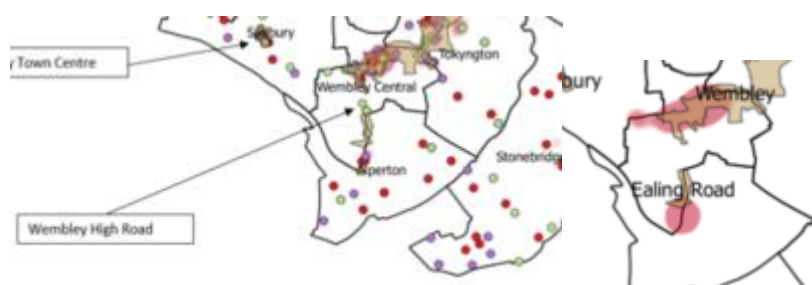
#### Street Drinking Hotspots

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



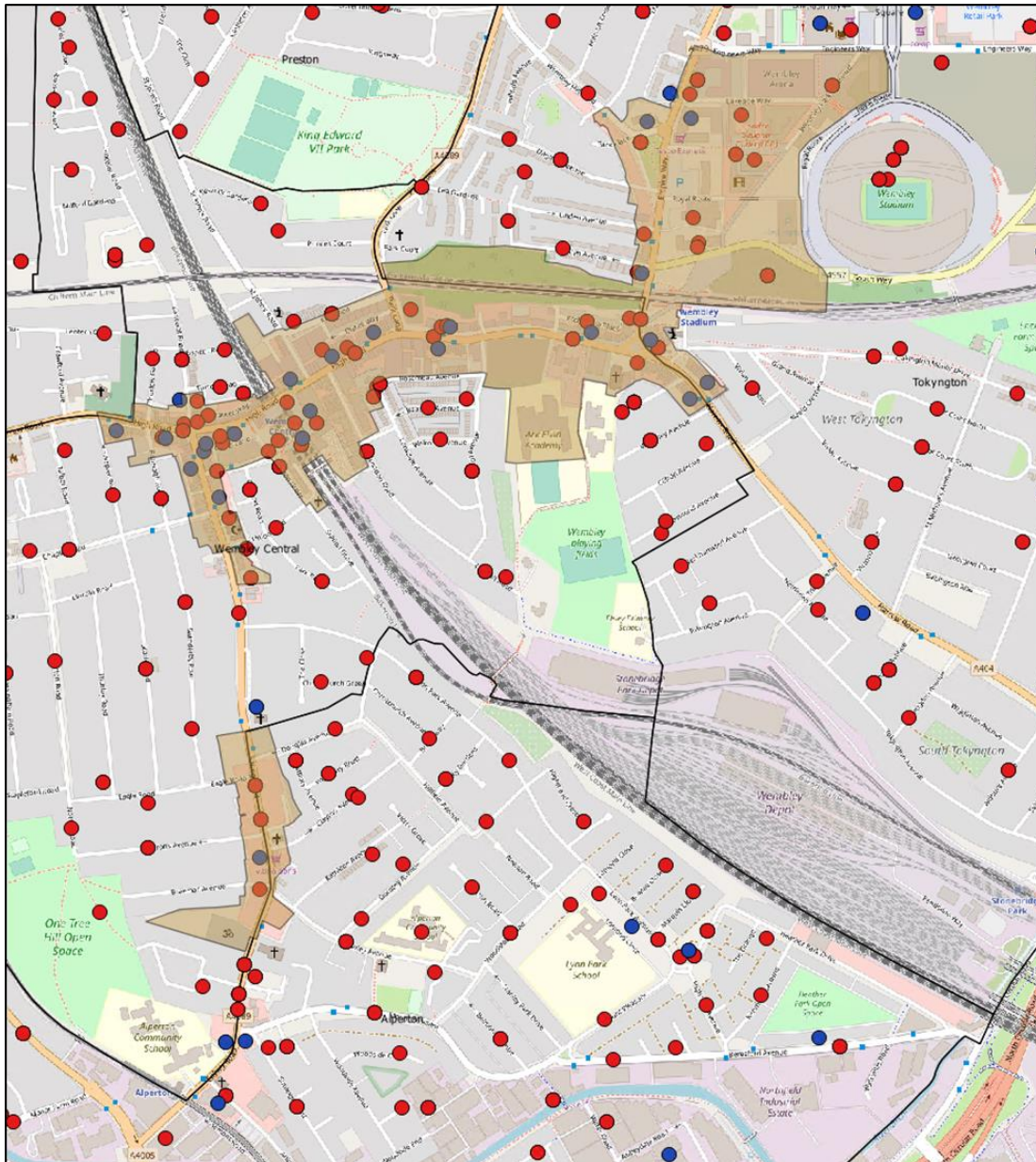
*Calls to police specifically related to street drinking between 01/06/2017 and 31/05/2019*

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

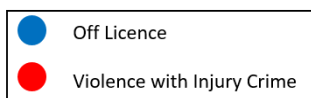


*Alcohol-related ambulance and Police calls between 01/06/2017 to 31/05/2019*

#### Hotspot of Violence with Injury Crimes

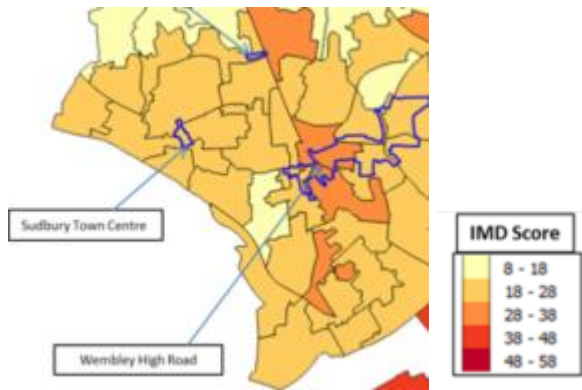


All violence with injury crimes and offences in Wembley (01/06/2017 and 31/05/2019)



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

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



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

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

### **Public Space Protection Order (PSPO)**

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

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

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

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

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

### **Linking Street Drinkers to Off-Licences**

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

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

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

### **Premises Licence Application**

#### **Operational Plan, Local Research & Conditions**

The Licensing Authority would expect to see information on how the business plans to ensure that their particular premises will go above and beyond in promoting the licensing objectives in an area located within a CIZ.

There has been no indication that the premises has done any research on issues such as street drinking in the immediate area and presented the outcome of those findings within the application.

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

There appears to be no evidence in the premises licence application which indicates that the off licence will operate differently to the existing off licences.

### **Summary**

There are already a large number of off licences in the area:-

- Wine Mart 34-38 Ealing Road
- Wembley Off Licence 96 Ealing Road
- Ealing Newsagent 154 Ealing Road
- Sidney's off licence 216 Ealing Road
- Diu Portigal, 226 Ealing Road
- San Remo Food & Wine 276 Ealing Road
- Jalaram, 284 Ealing Road
- Anshraj Food & Wine, 290 Ealing Road
- Lidl, Minavil House, Ealing Road
- Sainsburys 360 Ealing Road
- A to Z Convenience Store, 406-406 Ealing Road
- Anglo-Asian Cash & Carry, 537-539 Ealing Road

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

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



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

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

Yours faithfully

A handwritten signature in blue ink, appearing to read 'S. Figueiredo', is positioned above a horizontal line.

Susana Figueiredo  
Licensing Inspector  
Regulatory Services