



**METROPOLITAN  
POLICE**

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## TERRITORIAL POLICING

### The Licensing Authority

Brent Civic Centre  
Engineers Way  
Wembley  
Middlesex  
HA9 0FJ

**Your ref:** 21151

**Our ref:** 142/21/2965NW

### Brent Borough Licensing Department

Harrow Police Station  
74, Northolt Road  
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HA2 0DN

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**Date:** 26/01/2021

Police representations to a New Premises Licence application for:

**"UK LUXMY, 101 DUDDEN HILL LANE, WILLESDEN, LONDON, NW10 1BH".**

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 Constable 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. The Police representations are primarily concerned with crime and disorder, public nuisance and protecting children from harm.

The premises sits on the corner of Dudden Hill Lane ( A4088; a major arterial traffic route onto A406) and Cooper Road, directly opposite the further education campus of the College of North West London.

There are a large number of On/Off licences in the Dudden Hill Lane/Willesden area as a whole. The saturation of such venues has facilitated the bad habits of street drinkers, giving them easy access to alcohol, often compounded by irresponsible sales. This in turn has had a negative effect in the area leading to more crime, disorder and public nuisance and even children having access to alcohol. The issue

has become so prevalent that Brent Council deemed the area one of its Cumulative Impact Zones (CIZ). Where a Premises Licence 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. This is unless the applicant can satisfactorily evidence that their application or variation will not negatively impact on the licensing objectives.

On Tuesday 18<sup>th</sup> May 2021, I called the applicant and proposed licence holder, Mr Kulaveersingham Kulachelvan, to discuss the reasons for his application and whether or not he had any knowledge of the local area and its issues. I explained I was dealing with his application from the Police licensing side of things and ensured he had time to talk.

Q. Have you had experience of selling alcohol and groceries and if so what kind?

A. 20 to 25 years, Camden.....Hampstead.

Q. Are they still yours, still open?

A. Yes.

Q. Is this your first licensed premises in Willesden area?

A. Yes.

Q. Are you aware of any local issues or problems in the area of Dudden Hill lane and Willesden that might make a difference to your application?

A. No..... It's a good location for me.....

Q. What I mean is, have you looked into any problems in the area, such as street drinking, ASB or crime?

A. No.

Q. When did you first get a premises licence and complete a course?

A. 22 years ago.

Q. What are your responsibilities towards the licensing act as a premises licence holder?

A. Errrr, well, no more than 6% cans.....

Q. That's not what I asking, I mean what do you understand your role to be a premises licence holder? Can you tell me what the four licensing objectives are?

A. Mmmm, no, I'm not sure.

Q. Do you know about the Cumulative Impact Zone in the area?

A. No

Q. What proportion of the shop will sell alcohol?

A. Errrr, 5 metres of shelves.

Q. Will you sell chilled beers and alcohol in fridges?

A. Yes, some for beer, one for wine.

I told Mr Kulachelvan the purpose of the CIZ policy in Brent and why this could be an issue for his application and I would be making representations which would be sent to his agent as well as Brent Council.

The lack of the applicants understanding regarding licensing objectives and his responsibilities as a premises licence holder coupled with his lack of knowledge about the area he wants to open the off licence is very concerning. The application makes no reference to addressing the fundamental concerns of overcoming the issues for which CIZ's were created to address.

It might be argued the location of the shop is slightly further away from the main concentration of other licensed premises (aside from the Petrol station across the road). However, adding this premises to the others will only increase chances of the exacerbating existing issues and problems in the area and expanding the geographical footprint of off-licences. The shop also intends to have an extensive proportion of its sales dedicated to alcohol sales. Another issue in terms of its location is it's situated directly across the road from a large campus of further education, which is an additional worry.

For this reason, police are opposed to the premises licence application.

Yours Sincerely,

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