



# METROPOLITAN POLICE

## The Licensing Authority

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**Your ref:** 22238

**Our ref:** 21/2965NW

## Brent Borough Licensing Department

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## Police Representations to a New Premises Licence application – Ghana Market, 138, Church Road, London, NW10 9NH.

I acknowledge receipt of an application for a new Premises Licence under section 17 of the Licensing Act 2003, for Ghana Market, 138 Church Road, London, NW10 9NH.

**On behalf of the Commissioner of Police of the Metropolis, I wish to make a representation, as police believe the following objectives will be undermined, namely the Prevention of Crime and Disorder and the Prevention of Public Nuisance.**

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 venue sits on a parade of shops slightly off-set from Church Road (A407), which is a busy route for traffic throughout the day. The Church Road immediate surrounds itself is made up of a mixture of densely packed residential accommodation and some retail businesses. There are 4 existing off licences in close proximity to the newly proposed off licence. The socio-economic aspects of the area show it is made up of an ethnically diverse population, with a higher percentage of lower income residents comprising of semi-skilled, unskilled and those on state benefit (social grading figures taken from streetcheck.co.uk).

The area is somewhat rundown and has crime and disorder issues, including a lot of gang related violence in the area. There is a relatively high level of crime and disorder in the area, the vast majority relate to ASB, then violent offences against the person. In July 2021, for the NW10 9NH area, there were 81 reported cases of ASB, 48 cases of violence against the person and 21 drug offences from a total of 233 reported offences overall. These figures are usually higher. Whilst the area is not part of a designated Cumulative Impact Zone (or Area), it does experience its fair share of street drinking issues which can often lead or add to the issues of crime, disorder and public nuisance. Adding to the supply of alcohol off sales in the area is a definite concern given these existing issues, as well as there already being other 4 off licences close by.

Whilst some of the applicants proposed conditions are welcome, the issue of high strength beer, lager and cider is not addressed as well as I would hope. I would want amendments to the conditions relating to ABV strength of beer, lager and cider, as well as including a condition to tackle the sale of smaller bottles of spirits also associated with street drinking. Given the existing issues of the area, I would also ask for no exemptions to the beer, lager

and cider sales ABV condition, as the distinction and definition of a premium product can be somewhat open to interpretation. Many of the police proposed conditions are amendments to those suggested by the applicant. These amendments are more in line with creating a defined "industry standard" condition that is not open to misinterpretation for the purposes of clarity and uniformity.

#### **Personal Licence Holder**

The sale of alcohol to drunken people and children is a common cause of concern to police and highlighted in the Governments Alcohol Harm Reduction Strategy. Those who sell alcohol should be fully aware of the legislation and issues around alcohol and should be fully trained to a national standard.

#### **Closed Circuit Television (CCTV)**

Good quality CCTV is essential as a deterrent for the prevention of crime and the detection of offenders. It allows for both covert and overt monitoring of the premises. With proper signage, this reassures both staff and clientele, that this is a safe environment where illegal activities are not tolerated. All cameras and recording equipment will be installed and maintained in accordance with Home Office Guidance and the manufacturer's instructions and will be fully operational when the premises are open to the public.

Notices shall be displayed at the entrance to the premises, and in prominent positions throughout the premises, advising that CCTV is in operation.

#### **Operating Hours to be displayed on Premises**

A notice displaying the opening hours, the type of licensing activity and licence conditions should be clearly displayed and visible to anyone outside the premises. This may be incorporated in the summary of the licence, which must be displayed, or take the form of a separate item. Likewise the name of the Designated Premises Supervisor (D.P.S.) should be similarly displayed. This will allow the Police and other responsible authorities to readily identify the licence details. Clearly displayed opening hours will also reduce any confusion for customers prior to entering the premises and possible conflict when the premises close/stop selling alcohol.

A Summary of the Premises Licence will be displayed at each public entrance to the premises.

#### **Police require the following points should be added as conditions on the premises licence as below.**

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 authorised Officers from Brent Council upon request. This must comply with the Data Protection Act including signage.
2. CCTV camera shall be installed to cover the entrance of the premises and further cameras installed to cover the full coverage of the interior of the premises accessible to the public.
3. The CCTV system shall display on any recordings the correct date and time of the recording.
4. The CCTV system shall be capable of obtaining clear facial recognition images and a clear head and shoulder image of every person entering or leaving the premises.
5. 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.

6. The Licence holder/DPS/Manager shall inspect and test that the CCTV is operational and working correctly on a weekly basis. A signed and dated record of the CCTV examination and any findings shall be kept on the premises and made available to the police and authorised officers of the Local Authority on request.
7. A "Challenge 25" policy shall be adopted and adhered to at all times.
8. No high strength beers, lagers, and ciders above 6.0% ABV shall be stocked or sold.
9. No miniature bottles of wine or spirits in units less than 35cl shall be stocked or sold.
10. 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 incidents of disorder
  - (e) any faults in the CCTV system or searching equipment or scanning equipment
  - (f) any refusal of the sale of alcohol
  - (g) any visit by a relevant authority or emergency service.
11. 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.
12. A suitable intruder alarm complete with panic button shall be fitted and maintained.
13. The following crime prevention measures shall be implemented:
  - A time delay safe with deposit slot and anti-fishing mechanisms must be used at the counter till area.
  - Regular robbery awareness and cash minimisation training shall be given to all staff.
14. All staff employed at the premises shall be fully trained in making sales of alcohol and in particular how to manage issues in relation to underage sales and dealing with intoxicated persons and street drinkers. The individual training shall be documented and made available to the police or officers authorised by the licensing authority upon reasonable request. This training should be conducted twice yearly.
15. No alcoholic goods or tobacco products will ever be purchased or taken from sellers calling to the shop.
16. The Challenge 25 shall be operated as the proof of age policy and only a valid passport, photo driving licence, HM forces photographic iID card or proof of age card with the PASS logo or hologram on it may be accepted as proof of age.
17. The till/s will utilise an electronic age verification check prompt for all sales of alcohol.
18. Copies of all invoices for the purchase of alcoholic products will be kept on-site and made available for inspection by the authorities for a period of at least 12 months.

Yours Sincerely,

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