IN THE MATTER OF THE LICENSING ACT 2003

AND IN THE MATTER OF THE PREMISES KNOWN AS 67 LILBURNE WALK, LONDON, NW10 0TN

BETWEEN:

MR. VARANDEEP SINGH KHURANA

Applicant

AND

BRENT LONDON BOROUGH COUNCIL

The Licensing Authority

WRITTEN SUBMISSIONS / REPRESENTATIONS OF OBJECTION

Re. Application for a Premises Licence- Mr. Varandeep Singh Khurana- Proposed Premises: 67 Lilburne Walk, London, NW10 0TW

1. These written representations are further to the above being an application by Mr. Varandeep Singh Khurana ("the applicant") for permission for a premises licence in respect of 67 Lilburne Walk, London, NW10 0W ("the premises") and pursuant to The Licensing Act 2003 ("the Act"). The licensing authority, Brent London Borough Council, is hereafter referred to as "BC". At the outset, I stress herein that these representations are my objections to the application and invite you to treat the entirety of these representations as the same.

- 2. I am an interested party in that I reside at on the therefore have a close-enough nexus to make these representations.
- 3. In accordance with s.4 (2) of the Act, I shall address the salient licensing objectives below and *seriatim*:
- a) The Prevention of Crime and Disorder
- b) Public Safety;
- c) The Prevention of Public Nuisance; and
- d) The Protection of Children from Harm. 1

The Prevention of Crime and Disorder (a)

4. The premises is located, slap-bang in the middle of The St. Raphael's Housing Estate ("SR"). As BC is well-aware, SR has always been known to house some of the most vulnerable members of society. Indeed, many of those that reside here are from socially marginalised communities which has hitherto translated into the area having its fair share of trouble with relation to crime and criminality, generally (to put it mildly). The area was a hotbed for gang activity, drug dealing / use, and violent crime.² Only in the last 5 or so years has this improved (although not entirely), and due to the persistence and dedication of local residents, as well as through the assistance of public sector bodies such as BC's housing / community safety team, the police, and other third sector organisations. To say it would be counterproductive to allow this application is an understatement of the century. It would no doubt result in the return to this hitherto life of criminality, drug-dealing, drug use, and violence in the local vicinity and undo all

¹ The sub-committee is reminded that there can be a clear overlap with the 4 objectives: Porky Pint Ltd v. Stockton on Tees BC [2023] EWHC 128 (Admin)

² 'Slingshot Attacks and Knives at St Raphael's Estate Spark Call for more Police' (04.10.2021) at: https://www.kilburntimes.co.uk/news/crime/21928384.slingshot-attacks-knives-st-raphaels-estate-spark-call-police/

^{&#}x27;Father and Sons Convicted of Killing 25-year-old in Brent Machete Attack' (26.07.2023) at: https://www.standard.co.uk/news/crime/father-sons-murder-killing-neasden-brent-machete-st-raphaels-estate-gangs-london-crime-b1096891.html

those years of multi-agency work. In short, the risks are far too significant to overlook simply to allow this application.

- 5. Moreover, as the police and indeed BC are well-aware, there is an active police case concerning an individual who was involved in drug-related activity on the estate which resulted in the murder of an individual in the area.³ The accused literally attended the very parade of the premises a few minutes after the murder and was not apprehended, it is understood, until the next day. Fear, anxiety, and emotions are understandably very high at SR at this present time and allowing this application to go through will add salt to the wounds of all those residents worried about the rise in criminality in recent months, as aforesaid.
- 6. Furthermore, as the police and BC will confirm, there was a significant and violent incident which took place several months' ago at The Dar al Ilm Mosque, being SR's only Mosque and literally next door to the premises and at 65 Lilburne Walk. That perpetrator, whilst drunk, perpetrated racial and religious abuse (physical and verbal) towards worshippers of the Mosque after Friday prayer, which resulted in her being arrested and, as I understand, convicted at The Magistrates Court. There is thus a clear and recent history of alcohol consumption, violent behaviour, and criminal convictions on the actual parade of the premises.
- 7. BC and the police are also well-aware of the regular frequenting on SR of gangs and others intent in partaking in criminality. Knives, drug paraphernalia, and indeed nitrous oxide cannisters are a near daily presence on the estate. There are many who are of the view that very little, if anything, is being done about this here. I myself have personally cleaned the flower beds right opposite and next to the premises and have discarded of these cannisters. They are littered all over Lilburne Walk, from right outside the premises all the way up to the garages. Allowing this application will not only lead to the preservation of the existing problem but will show others, intent to cause trouble, that they can add to our problems by purchasing alcohol and causing trouble. The application must therefore be refused. I refer to an image taken on 16 October 2025

³ 'Ice Cream Seller in Fatal Wembley Attack Named' (20.08.2025) at: https://www.bbc.co.uk/news/articles/cx23g97vk9mo

which shows a large nitrous oxide cannister in blue and yellow alongside paraphernalia marked **BK001**.

Public Safety (b) and The Prevention of Public Nuisance (c)

8. BC and the police are both aware of the ongoing issues the residents are having with drugs and alcohol on the Brent River Park which is within the wider estate and a mere 5 or so minute walk from the premises. Those people frequent the off licenses in the Monks Park / Stonebridge Park area, then walk towards the estate in order to partake in their criminality of violent behaviour, criminal damage, urination in a public place, the taking of drugs, to name but a few. It is by virtue of the ease in availability of alcohol and the relationship with the alcohol use that this criminality takes place without which, there would be no incentive for them to sit on the walls and misbehave. To allow this application will essentially endorse this behaviour and rubber-stamp more criminality, nuisance, and anti-social behaviour which is literally a daily occurrence. You are further implored to refuse this application.

The Protection of Children from Harm (d)

9. The premises is located right in the middle of two children's playgrounds. In fact, the main path along Lilburne Walk, where the premises is, serves both playgrounds and is the main path that local children in the area play. We can attest to the fact that children frequently, and daily, ride their bikes, play football, run around, and otherwise play on this pathway. The sale of alcohol in this exact vicinity will no doubt have a negative and detrimental impact on the safety of these children; our children, who play right outside with the ensuing increase in anti-social behaviour, as aforesaid. Furthermore, after a while, there is a very strong likelihood of parents keeping their children inside and thereby negatively affecting their childhood. SR is an estate predominantly made up of young families and the amenities present, whilst not perfect, are satisfactory in allowing the children to socialise and play. These children play with each other, each one from different ethnic and religious backgrounds. This amalgamation of children from different backgrounds is testament to the positive community cohesion present here. With parents being reluctant to allow their children to play outside, there will be clear social repercussions and an attack on our community's social cohesion and

- diversity. We cannot and will not allow this, especially at a time of heightened societal ethno-religious tensions, to happen. This application must therefore be refused.
- 10. The premises is also opposite the St Raphael's Voice Centre ("SRV"), a local community centre that provides classes and support to the wider community. Some of the regular activities held at the SRV are maths tuition for children, a weekend and midweek youth club, women's exercise and fitness club, sports club, and the like. Many of those that attend the SRV are vulnerable, victims of domestic abuse, those new to the country, and children with special needs. I am certain in saying that if this application were permitted, and alcohol was being sold from within the premises, many of these hitherto marginalised residents would not attend their classes and thus return to the doldrums of their troubled home lives. I refer to an annotated Google Maps page of the area denoting the premises, the two playgrounds, and the SRV marked **BK002**.

Miscellaneous Concerns

- 11. The applicant currently operates a number of similar businesses mainly in / around Greater London with the exception of 1 in The West Midlands. For the avoidance of doubt, these are:
- (i) North End Food & Wine Ltd, CN 15429400, c/o 52 Vanbrough Crescent, Northolt, UB5 5JW (but whose business address appears to be 228 North End Road, West Kensington, London, W14 9NU);
- (ii) Caledon Convenience Ltd, CN 15391586, c/o 52 Vanbrough Crescent, Northolt, UB5 5JW (but whose business address appears to be 194 Caledon Road, East Ham, London, E6 2EX);
- (iii) Hilltop Local Ltd, CN 15025589, c/o 52 Vanbrough Crescent, Northolt, UB5 5JW (but whose business address appears to be 48 Hilltop Avenue, London, NW10 8RZ);
- (iv) Colney Food & Wine Ltd, CN 14639929, c/o 260 Colney Hatch Lane, London, N10 1BD
- (v) Churchill Local Ltd, CN 13470764, c/o 17 21 Churchill Parade, Sutton Coldfield, B75 7LD
- (vi) VSK Ventures Ltd, CN 11116466, c/o 52 Vanbrough Crescent, Northolt, UB5 5JW

- (vii) Mottingham Supermarket Ltd, CN 12819149, c/o 52 Vanbrough Crescent, Northolt, UB5 5JW
- (viii) Whitestile Local Ltd, CN 12347293, c/o 122 Whitestile Road, Brentford, Middx., TW8 9NW
- 12. I refer to The Companies' House Register detailing the above marked **BK003**.
- 13. Whilst there isn't much by way of deeper analysis of these businesses on the internet, there are nevertheless some serious concerns that the sub-committee ought to consider:
- (i) *Hilltop Local Ltd-* The Registrar of Companies has published a notice of a Compulsory strike-out for, presumably, an overdue confirmation statement: https://find-and-update.company-information.service.gov.uk/company/15025589
- (ii) Churchill Local Ltd- this is apparently trading as a branch of Costcutter (for the avoidance of doubt, at the very same address), and appears to demonstrate a running theme of poor customer service which borders on alleged discriminatory practices. There are reviews which state that the shopworkers are disrespectful to women, there are apparent altercations with residents, and a tendency to sell items past their sell-by dates. This would demonstrate a poor grasp of regulatory / legal obligations. I refer to Internet reviews in respect of Churchill Local Ltd detailing the above adumbrated concerns marked BK004.
- (iii) Whitestile Local Ltd- there is, once again, online reports of poor service and regulatory / legal compliance. There are allegations of the misappropriation of parcels, rude staff members, and the sale of allegedly counterfeit alcohol in the store. I refer to Internet reviews in respect of Whitestile Local Ltd detailing the above adumbrated concerns marked BK005.
- 14. In light of all of the above, it is my respectful submission that the application fails to adhere to any of the requirement pursuant to s.4 (2) of the Act, although there is a strict requirement on the applicant to adhere to each and every one of them. Moreover, it is a matter of established law that it is appropriate and necessary to consider the wider

public interest on the issue of an application for a licence to sell alcohol on the grounds of alleged criminal activity: R. (on the application of Bassetlaw DC) v. Worksop Magistrates' Court [2008] EWHC 3530 (Admin).

15. In the light of the above being my strong and vehement objections to the application, in the event that the Council lists this application for consideration at the subcommittee, I give notice now that I intend to make oral submissions in accordance with these, my representations. I reserve the right to produce a skeleton argument in support of my grounds of objection nearer to the time.

16 October 2025

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BETWEEN

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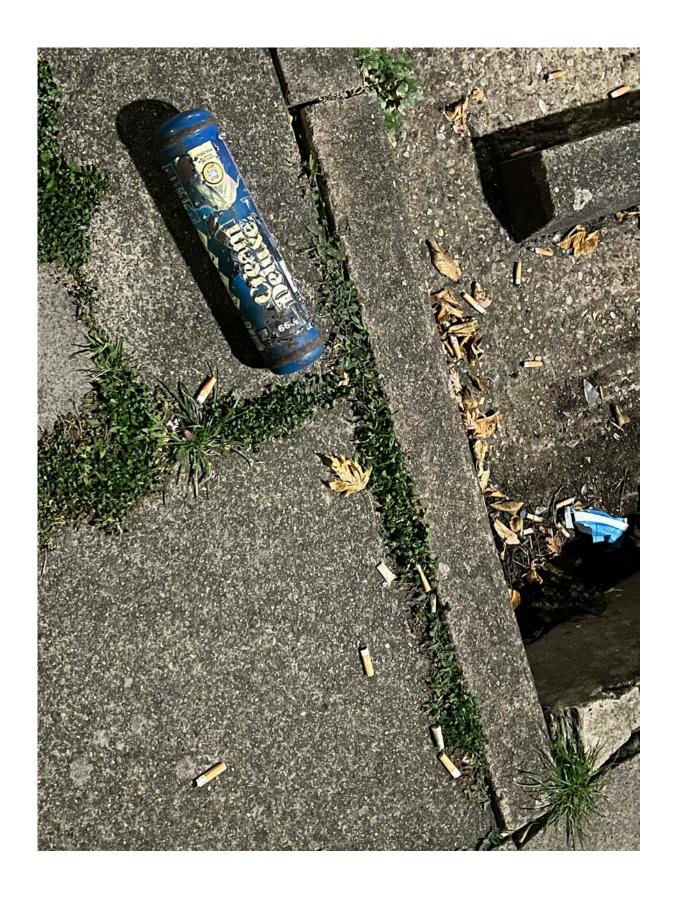
Applicant

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EXHIBIT BK001 NITROUS OXIDE GAS CANNISTER AND PARAPHERNALIA 16.10.2025



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EXHIBIT BK002 GOOGLE MAP ENTRY OF PREMISES, THE TWO PLAYGROUNDS, AND THE SRV



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EXHIBIT BK003 COMPANIES' HOUSE REGISTER OF THE APPLICANT'S COMPANIES

As per The Register on Companies' House: https://find-and-update.company-information.service.gov.uk/officers/50noS-DNaRZh1iWLUT-KynKE8ug/appointments

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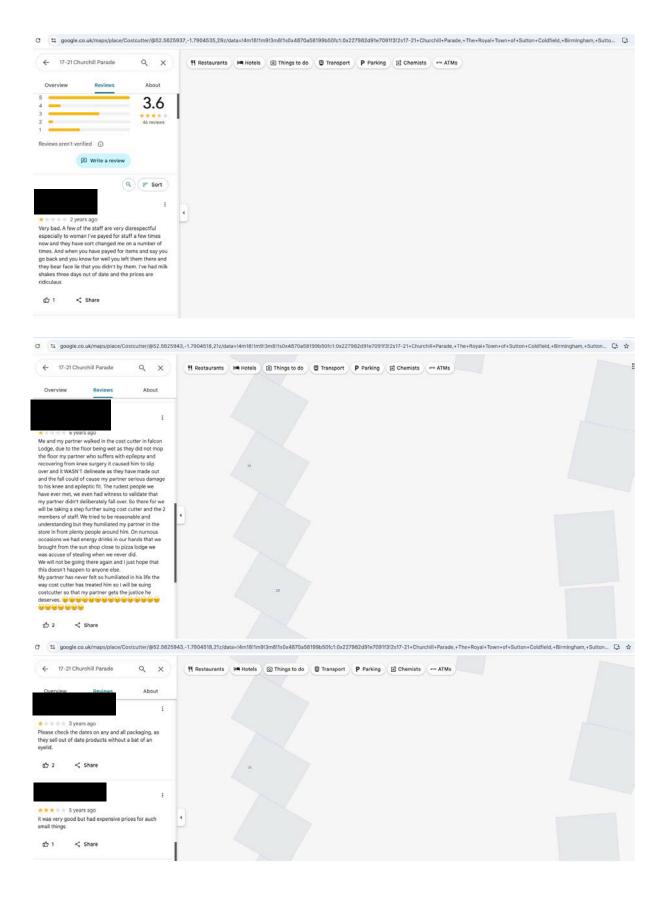
AND

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EXHIBIT BK004

WEB ENTRIES OF REVIEWS IN RESPECT OF THE APPLICANT'S COMPANY AT 17 – 21 CHURCHILL PARADE, B75 7LD



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EXHIBIT BK005 WEB ENTRIES OF REVIEWS IN RESPECT OF THE APPLICANT'S COMPANY WHITESTILE LOCAL LTD

