

Arka Licensing Consultants
Trident Business Centre
89 Bickersteth Road
SW17 9SH

03 December 2025

Our Ref: 36591

Dear Sir/Madam,

**Licensing Representation to the Initial Application for the Premises Licence at Londis,
152-154 Church Road, London, NW10 9NH**

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)

In 2022, Brent Council reviewed its Cumulative Impact Policy after assessing crime data from various sources. This led to the implantation of the Cumulative Impact Zones (CIZs) in specified areas within Brent, as outlined in the latest Statement of Licensing Policy (2025 – 2030).

Evidence shows a strong correlation between concentrations of off-licences and incidents of alcohol related anti-social behaviour, particularly associated with street drinking.

The significant and notable increase in alcohol related crime and anti-social behaviour is having an adverse impact in some of the areas and neighbourhoods which generates complaints from residents, councillors and the Police. This undermines the licensing objectives and also has potential to undermine the vitality of Brent's town centres.

Willesden has been identified as one of twelve Cumulative Impact Zones in Brent, where the authorising of further licences may undermine the promotion of the licensing objectives.

Willesden

Willesden consists of a busy large parade of shops in the Willesden Green Ward.

The Statement of Licensing Policy describes the area as one experiencing medium to high levels of deprivation which is a hotspot for alcohol flagged calls to the Police due to crime and anti-social behaviour (ASB). Recent data shows the alcohol-related issues are primarily just outside the town centre around the junction of High Road, Willesden and Pound Lane.

All other town centres in Brent suffers from street drinking; however, in parts of Willesden such as Church Road and Pound Lane, the street drinking interrelates with drug misuse and violent crime.

Between 1 July 2021 and 30 June 2022 there were 240 reports to the police, including 93 relating to anti-social behaviour, 31 relating to public order breaches and 106 reports relating to violence.

The streets included in High Road, Willesden area:

- High Road
- Dudden Hill Lane
- Walm Lane
- Station Parade
- Willesden Lane
- Pound Lane
- Church Road

The purpose of the CIZ in Willesden (Church Road) is to address the issues mentioned above.

The Premises

The premises is located at 152-154 Church Road, NW10 9NH, within a ground-floor commercial unit beneath a residential block of flats, along a parade of shops that include existing off-licences and food-led businesses.



To date, there are a number of existing off licences within a 5 minute walk:

Shop 4 You, 148 Church Road, NW10 9NH (Licence No. 162708)

Permitted Hours: 06:00 – 00:00, 7 days a week

Distance: 1 minute (59ft)

Morgan Cash and Carry, 120 Church Road, NW10 9NG (Licence No. 147807)

Permitted hours: 08:00 – 23:00, Monday to Saturday and 10:00 – 22:30, Sunday.

Distance: 2 minutes (499ft)

Sunrise Food Market, 182 Church Road, NW10 9NP (Licence No. 155209)

Permitted hours: 08:00 – 00:00, Monday to Thursday. 08:00 – 01:00, Friday to Saturday.

09:00 – 23:00, Sunday.

Distance: 1 minute (351ft)

Public Space Protection Order (PSPO)

The entire Borough of Brent is subject to a Public Space Protection Order for street drinking, and it is an offence if a person fails to comply with a request to cease drinking alcohol by an authorised officer.

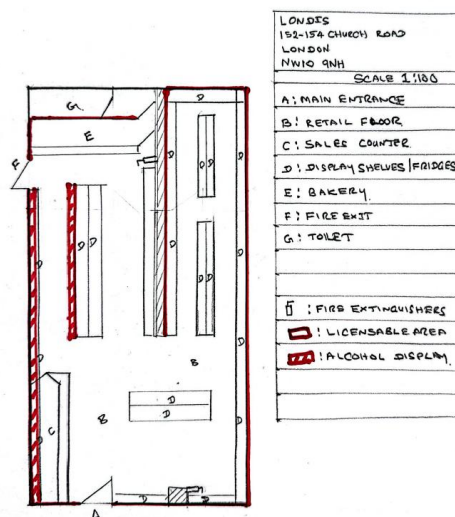
If a police officer reasonably believes that a person is, or has been, consuming intoxicating liquor within these areas, the officer may require the person concerned:

- 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. If off licences did not exist, the number of street drinkers would decline.

The Plan

The plan appended to the application for a new premises licence indicates a traditional off licence layout.



The business plan states “*Cameras on the entrance, including both serving hatches, must capture full frame shots of the heads and shoulders of all people entering the premises*” however, the submitted plan does not outline where these two hatches would be.

Discussion with applicant:

On Thursday 20 November 2025, I spoke with the applicant and proposed DPS, Sathiaselan Bastianpulle via telephone to obtain further information related to the application.

The following questions were asked and recorded below:

1. **Rhea Vagarwal (LA):** When do you intend to take over the premises?
Shivanthakumar Bastianpulle (LH/DPS): Lease I got in February. I traded for a while, nothing going on now, going to start when permission started. It is being renovated.
 2. **Rhea Vagarwal (LA):** Who pays the Business Rates?
Shivanthakumar Bastianpulle (LH/DPS): I pay business rates. I spoke to council recently about direct debit.
 3. **Rhea Vagarwal (LA):** Did you read the application and are you happy with the content?
Shivanthakumar Bastianpulle (LH/DPS): Yes
 4. **Rhea Vagarwal (LA):** Are you aware that the premises falls in a CIZ, and do you know what that means?
Shivanthakumar Bastianpulle (LH/DPS): I am not fully clear about it, but I know some of the things. No high-volume ciders or anything and no miniatures. I concentrate on family shopping, no need to sell to street drinkers or it would be headache.
 5. **Rhea Vagarwal (LA):** Can you explain any specific ASB issues near the premises?
Shivanthakumar Bastianpulle (LH/DPS): I don't know but it is not much trouble in that area, around the tyre shop. Too many people selling weed, don't make harm but police attend many times.
 6. **Rhea Vagarwal (LA):** Can you explain the age verification policy that you intend to adopt?
Shivanthakumar Bastianpulle (LH/DPS): What do you mean...oh challenge 21.
 7. **Rhea Vagarwal (LA):** Can you explain the 4 licensing objectives?
Shivanthakumar Bastianpulle (LH/DPS): I am not sure.
 8. **Rhea Vagarwal (LA):** Do you know about Public Space Protection Order in Brent?
Shivanthakumar Bastianpulle (LH/DPS): What does that mean?
 9. **Rhea Vagarwal (LA):** There are many existing off licences in local area, why do you want to open another off licence?
Shivanthakumar Bastianpulle (LH/DPS): It is not a good area with supermarkets. They don't have anything with bakery items, vegetables. They have a few but not proper ones. I plan to put a meat shop there too as there is none. I try to cover everything in one and hope to support customers.
 10. **Rhea Vagarwal (LA):** If the application is refused, will you keep the lease and continue to trade?
Shivanthakumar Bastianpulle (LH/DPS): I don't have an idea at the moment. I already lost money from the tyre business.
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Based on my conversation with the applicant, I am not entirely confident that he is fully aware of the area's status as an Anti-Social Behaviour (ASB) hotspot. Whilst I appreciate the applicant's intention to introduce numerous services to the community, the proposed business model lacks distinctiveness.

I acknowledge measures have been proposed to meet the licensing objectives however, the applicant does not demonstrate full awareness of key factors within the area such as the PSPO, CIZ or street drinking issues which causes concern on how potential issues may be dealt with.

Background information:

Upon conducting checks, it appears that Mr Shivanthakumar Bastianpulle is also the licence holder at the premises situated in close proximity at Shop 4 You, 148 Church Road, NW10 9NH.

A subsequent telephone conversation was had with Mr Shivanthakumar Bastianpulle on Friday 28 November 2025 to discuss the above matter whereby it was confirmed that he does not wish to surrender the licence for his current business. I was informed that he intends to open this premises as 'Londis' which supplies alcohol and in my belief, would add to the cumulative impact.

It has come to my attention that the Licensing Police conducted a visit to Shop 4 You on Saturday 29 November 2025 and discovered the licence holder failed to comply with condition 4 of the premises which stipulates "*A personal licence holder fluent in English shall be present on the premises and supervise the sale of alcohol throughout the permitted hours for the sale of alcohol.*"

Following the visit, a letter of warning was issued (see appendix RV1)

Summary

The Statement of Licensing Policy stipulates that any new premises licence application falling within a specified Cumulative Impact Zone will not be granted unless the applicant provides compelling evidence that the proposed licensable activities will not contribute to the issues the CIZ seeks to address, such as street drinking and alcohol-related anti-social behaviour.

Whilst a business plan has been provided, it fails to demonstrate that granting this application would avoid negative cumulative impact on one or more of the licensing objectives and to the contrary, add to the issues of an existing saturated area.

There is nothing to suggest that the premise will be offering any niche products other than typical goods you would expect to find at an local off licence bearing in mind, there are many existing grocery and off licence premises located in the area.

Willesden is a challenging area of the Borough fuelled with anti social behaviour including street drinking, therefore adding another off licence in the area will not benefit the wider community in my opinion. 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 however, if the Sub-Committee decides that there is sufficient evidence to the contrary, the Licensing Authority would request the following points be included in the operating schedule or added as conditions on the premises licence:-

1. The premises shall operate and maintain a digital colour CCTV system. The CCTV system shall continually record whilst the premises are open for licensable activities, and all recordings shall be kept for 31 days.
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2. The CCTV system shall capture clear images of every person entering or leaving the premises with further CCTV cameras covering the publicly accessible areas stipulated on the premises plan, including the frontage of the premises.
3. 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. This member of staff shall be able to view, download and make copies of any CCTV requests made by the police or authorised officer(s).
4. CCTV footage shall be provided within 24 hours upon request by Police and any authorised Officers from Brent Council, in a readily accessible format on removable media (I.e., USB, hard drive, CD etc..) or via digital transfer.
5. The CCTV system shall display the correct date and time on any footage.
6. Signage stating that CCTV is in operation shall be clearly and prominently displayed at the premises.
7. A "Challenge 25" policy shall be adopted and adhered to. Acceptable proof of age shall include identification bearing the customer's photograph, date of birth and integral holographic mark or security measure. Suitable means of identification would include PASS approved proof of age card, photo-card driving licence and passport.
8. A notice stating "No proof of age – No sale" shall be displayed at the point of sale.
9. A notice asking customers to leave quietly from the premises shall be displayed by the exit/entrance.
10. 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.
11. Any staff directly involved in selling alcohol for retail to consumers, staff who provide training and all managers will undergo regular training (every 12 months) 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.

The training records shall detail:-

- a) Staff member's name
- b) Staff member's signature
- c) Name of person providing the training
- d) Date of training
- e) Training on the licensing objectives
- f) Training on use of the incident log
- g) Training on refusal of sale
- h) Training on challenge 25 policy
- i) Training on the use and downloading (providing copies) of the CCTV system

This training shall be kept at the venue and made available immediately upon request to the police or authorised officers from Brent Council.

12. 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:
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- a) all crimes reported to the venue
- b) all ejections of patrons
- c) any complaints received
- d) any faults in the CCTV system
- e) any visit by a relevant authority or emergency service

Any entries into the log shall be made within 24 hours of any incident and shall contain the time/date of the incident, the nature of the incident, a description of the people involved, the action taken and details of the person responsible for the management of the premises at the time of the incident.

13. A refusal book detailing date and time of the refused sale, the name of the person refusing the sale and a description of the person attempting to purchase alcohol, shall be kept and maintained and made available for inspection at the premises.

Any entries into the log shall be made within 24 hours of any incident and shall contain the time/date of the incident, the nature of the incident, a description of the people involved, the action taken and details of the person responsible for the management of the premises at the time of the incident.

14. All deliveries (to the premises) shall take place during the normal working day (i.e. 09:00 to 18:00 daily).
15. A clear and unobstructed view into the premises shall be maintained at all times.
16. There shall be no single cans or bottles of beer or cider shall be sold at the premises.
17. There shall be no miniatures of spirits or wine sold at the premises.
18. No high strength beers, lagers, and ciders above 6.0% ABV shall be stocked or sold.
19. There shall be no self-service of spirits on the premises with all spirits being located behind counter.
20. All alcoholic drinks shall be clearly labelled or marked with the name of the premises.
21. A suitable intruder alarm and panic button shall be fitted and maintained.
22. A personal licence holder shall be at the premises at all times whilst open for licensable activities.
23. The premises licence holder shall display notice warning customers against drinking on the street in line with Brent Council's Public Spaces Protection Order.
24. The premises licence holder shall ensure that all tills in operation at the premises automatically provide age-related prompts to staff to check the age of the buyer when alcoholic products are passed through the till, or entered onto the till, for sale.
25. A lockable safe with deposit slot and anti-fishing mechanisms must be used at the counter till area in order to prevent crime.
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26. Drivers shall not deliver to any person anywhere other than that at the residential / business address given when the order was placed. There shall be NO deliveries made to any open/public spaces.
27. Delivery drivers should be asked to keep noise to a minimum when collecting deliveries and must not be permitted to loiter unnecessarily.
28. 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.


Supply of Alcohol (No Change)

Monday to Sunday – 10:00hrs to 23:00hrs

Opening Hours (No Change)

Monday to Sunday – 06:00hrs to 23:00hrs

Yours Sincerely

A handwritten signature in black ink, reading "R. Vagarwal", with a horizontal line drawn underneath it.

Rhea Vagarwal
Licensing Enforcement Officer
Regulatory Services



Working together for a safer London

TERRITORIAL POLICING

Shop 4 you
148, Church Road
Brent
NW10 9NH

Our ref: Police Visit 29/11/2025

NW BCU Licensing Department - Brent
Wembley Police Station
603, Harrow Road
Wembley
HA0 2HH
Email: Brendon.McInness@met.police.uk
Web: www.met.police.uk

Date: 02 December 2025

Dear Mr Shivanthakumar Bastianpulle,

As you are aware, my colleagues and I attended Shop 4 you on Saturday the 29 November 2025 to conduct a licensing visit.

We attended as a routine licencing check. When I walked in I was greeted by a young man behind the counter who identified herself as a member of staff. I asked the young man if anyone else was working at the venue and he stated yes and pointed to another colleague. I then asked the young man if he held a personal licence and again he replied no and appeared to not understand what I was talking about.

Condition 4 of your licence states:

"A personal licence holder fluent in English shall be present on the premises and supervise the sale of alcohol throughout the permitted hours for the sale of alcohol."

This was not the case and therefore were in breach of your premises licence and committing the offence of unauthorised licensable activities under section 136 of the licensing act 2003.

Can you please explain to me what action you will be taking to rectify issues? Please respond within one week of the date of this e-mail.

Please treat this e-mail as a written warning for breaching your premises license

Yours Sincerely,

PC Brendon McInnes 1187NW
NW BCU - Brent Licensing
Brendon.McInness@met.police.uk