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Mr Nick Semper  
TL Guys Ltd  
PO Box 303  
Llanymynech  
Shropshire  
SY10 6FE

09 December 2025

Our Ref: 36684

Dear Sir/Madam,

**Licensing Representation to the Initial Application for the Premises Licence at Craven Park Local, 28 Craven Park Road, NW10 4AB**

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.

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

## **Harlesden**

Harlesden town centre consists of multiple parades of shops that run along Craven Park Road, Park Parade and High Street, Harlesden.

The Statement of Licensing Policy describes the area as a hotspot for alcohol flagged calls to the Police for crime, anti-social behaviour and street drinking. Recent data shows the entire town centre suffers from high levels of alcohol related issues, including residential streets off the main town centre such as Rucklidge Avenue, Wendover Road, Buckingham Road and St Albans Road.

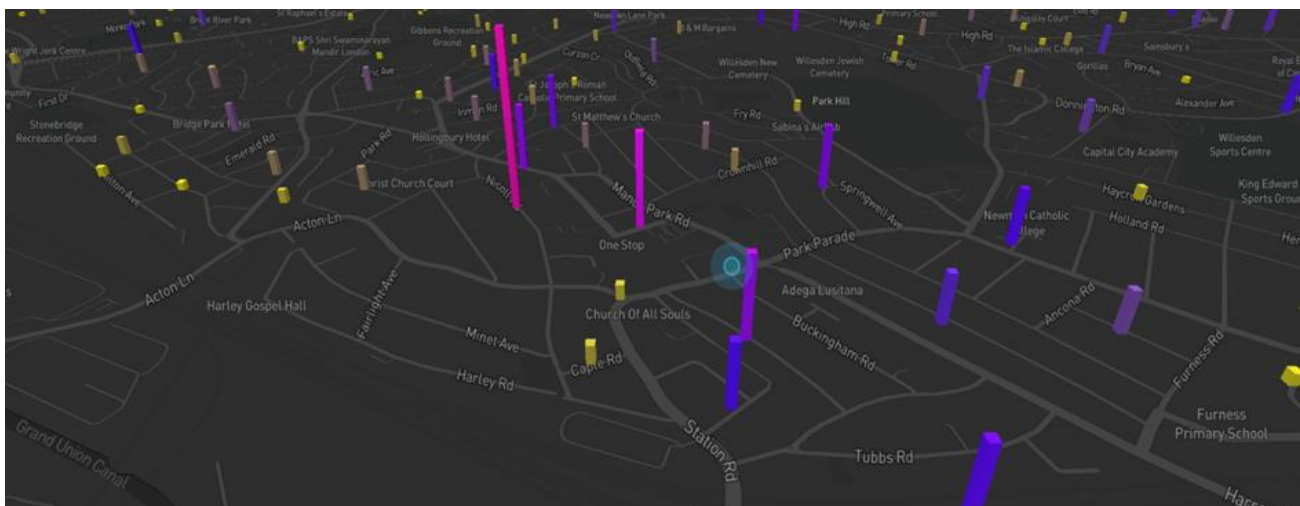
All other town centres in Brent suffers from street drinking; however, in parts of Harlesden such as Craven Park Road and High Street, the street drinking interrelates with drug misuse and violent crime.

Between 1 July 2021 and 30 June 2022 there were 321 reports to the police, including 184 relating to anti-social behaviour, 28 relating to public order breaches and 87 reports relating to violence/sexual.

The streets to be included in Harlesden are:

- Craven Park Road
- Craven Park
- High Street
- Park Parade
- Manor Park Road

The below map shows violence with injury crimes.



The purpose of the CIZ in Harlesden (Craven Park Road) is to address the issues mentioned above.

## **The Premises**

The premises is located at 28 Craven Park Road, NW10 4AB 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

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The town centre falls between, Harlesden and Kensal Green ward and is one of the most deprived areas in the borough. A number of existing off licences are also within a 5 minute walk.

Current Off Licences near Proposed Premises	Walking Distance from Proposed Premises
Who's Next, 6 Library Parade	1 minute (285ft)
Komoto Mini Mart 126 Craven Park Road	5 minutes (0.2mile)
Craven Park Off Licence, 102 Craven Park	6 minutes (0.3mile)
Corner Road Shop, 98 Craven Park Road	4 minutes (0.2mile)
Supersave, 68 Craven Park Road	2 minutes (430ft)
PS Drinks, 43 Craven Park Road	1 minute (246ft)
Tamariz Deli, 24 Craven Park Road	1 minutes (79ft)
Housewives Cash & Carry, 14 Craven Park Road	1 minutes (98ft)
Shady's, 164 Manor Park Road	1 minute (194ft)
Poziomka, 30-32 High Street	3 minutes (0.1mile)
Way 2 Save, 37-41 High Street	4 minutes (0.2mile)

### **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.

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### **Consultation visit:**

A visit was conducted to the premises in respect to the new application on Friday 28 November 2025 at approximately 11:00hrs.



The premiss plan indicates a traditional off-licence layout which also provides the service of a post office.

The applicant and proposed DPS, Mr Sathiasseelan Easwarakumar, was not present at the time of my visit however, we spoke over a telephone call and arranged a subsequent telephone appointment to discuss the application in more detail.

### **Discussion with applicant:**

On Thursday 4 December 2025, I spoke with Mr Sathiasseelan Easwarakumar via telephone whereby the following questions were asked and recorded below:

- 1. Rhea Vagarwal (LA):** Did you read the application and are you happy with the content?  
**Sathiasseelan Easwarakumar (LH/DPS):** Yes.
- 2. Rhea Vagarwal (LA):** Are you aware the premises falls within a CIZ, and do you know what that means?  
**Sathiasseelan Easwarakumar (LH/DPS):** Yes, I do. I have other shops under the same zone in Burnt Oak with Barnet Council which I got last year.
- 3. Rhea Vagarwal (LA) –** What has changed in this new application compared with the one that was refused last year?  
**Sathiasseelan Easwarakumar (LH/DPS):** Nothing was concrete last time; I didn't have any lease on my name or post office contract. Now I have been running for last 1 year and I have no issues with the community.
- 4. Rhea Vagarwal (LA) –** What new or strengthened measures are you proposing to promote the licensing objectives and ensure that no further cumulative impact is caused?  
**Sathiasseelan Easwarakumar (LH/DPS):** There are other issues such as drugs that I am aware of, but I will be compliant with all the licensing objectives...no single cans or miniatures so it leads to cutting down people drinking on the street. When a customer comes and asks, we will turn them back and say we don't have.

5. **Rhea Vagarwal (LA):** Can you list the 4 licensing objectives?  
**Sathiaseelan Easwarakumar (LH/DPS):** Prevent of crime and disorder, public safety, prevention of public nuisance and protection of children of harm.
6. **Rhea Vagarwal (LA):** Do you know about Public Space Protection Order in Brent?  
**Sathiaseelan Easwarakumar (LH/DPS):** To help particular issues with local residents. Since we have taken over the shop, we had councillors that had concerns with parking, and we have controlled it.
7. **Rhea Vagarwal (LA):** There are many existing off licences in the local area, why do you want to open another off licence?  
**Sathiaseelan Easwarakumar (LH/DPS):** It's not purely selling alcohol. We want our customers to purchase all goods in one place to make it easier. This area on record might have crime but since I took over, I only had a break in with stolen cigarettes, but they are arrested now because we worked with Police.
8. **Rhea Vagarwal (LA):** If the application is refused, will you keep the lease and continue to trade?  
**Sathiaseelan Easwarakumar (LH/DPS):** I am applying for a certain time because I am really keen to get more footfall and increase sales. I already told post office, they are giving it, I have amazon services now so I hope I can.
9. **Rhea Vagarwal (LA):** During my visit on Friday 28 November 2025, I observed two males who appeared to be intoxicated enter the premises. If the application was to be granted, how would you manage intoxicated individuals entering the premises to purchase more alcohol?  
**Sathiaseelan Easwarakumar (LH/DPS):** They aren't allowed to drink. And we won't sell alcohol to them. I don't have issues in the last 1 year.

Based on my conversation with applicant, Mr Easwarakumar has demonstrated some understanding of the area profile. Whilst I appreciate the applicant's intention to introduce numerous services to the community and willingness to accept proposed conditions from respective responsible authorities, the proposed business model lacks distinctiveness.

### **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 premises will be offering any niche products other than typical goods you would expect to find at a local off licence bearing in mind, there are many existing grocery and off licenced premises within the vicinity.

Harlesden 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.

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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.
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
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- 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:
- 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.
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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.
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 (Changed)**

Monday to Sunday – 10:00hrs to 22:00hrs

**Opening Hours (No Change)**

Monday to Sunday – 07:00hrs to 22:00hrs

Yours Sincerely



Rhea Vagarwal  
Licensing Enforcement Officer  
Regulatory Services