



**METROPOLITAN
POLICE**

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TERRITORIAL POLICING

Mr Thamotharampillai Tharmarasa
API AVI Convenience Store
383, Church Lane,
Kingsbury.
NW9 8JB

NW BCU Licensing Department - Brent

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Your Ref: 37419

Our ref: 01QK/085/26/3122NW

Date: Friday 13th of March 2026

Police representations to the application for a new Premises Licence for 'API AVI Convenience Store, 383, Church Lane, Kingsbury NW9 8JB'

Police certify that we have considered the application shown above and 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 are of the opinion that the risk to the Council's objectives can be mitigated by removing the requested variations or attaching conditions to the Licence as shown below. If these conditions were accepted in full, police would be in a position to withdraw their representations.

Officer: PC Phil Graves
Licensing Constable 3122NW

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 Licensing act 2003. The Police representations are concerned with all four of the licensing objectives, namely:

- The prevention of crime and disorder.
 - Public safety.
- The prevention of public nuisance; and
- The protection of children from harm.

The Application

The application has been made by Mr Tharmarasa for a new premises license to sell alcohol, off sales from 07.00 to 23.00 hours seven days a week.

The location of 383 Church Lane falls into the Kingsbury Cumulative Impact Zone (CIZ). CIZ's exist across the borough of Brent to help combat crime, street drinking and ASB in the worst areas. Below is a link to the CIZ web page. Any new or extended hours sales within Brent CIZ's are normally refused

by the police and local authority unless the applicant can prove there will be no negative effect on the licensing objectives.

www.brent.gov.uk/business/licences-and-permits/alcohol-club-and-entertainment-licences/premises-licence#ciz

On 26th of June 2025 a drugs warrant was executed at 383 Church Lane, which was then named Essentials and the flat above 383a Church Lane. As a result of these drugs warrant two (2) males who worked at the venue were arrested for possession with intent to supply drugs.

On 2nd of July 2025 a closure order was granted by Brent Magistrates Court, meaning the venue had to remain closed with no one was allowed access. This prompted a view of the premises license which was held at Brent Civic Centre on 14th of July 2025. The result of this hearing meant the license was revoked due to drugs related arrests and findings.

Due to the history of the venue when it was named Essentials a meeting was held at Brent Civic Centre on the 3rd of March this year. Present was myself, council representatives, Mr Tharmarasa and Mr Rushton (licensing agent). The application along with the history of the venue, Mr Tharmarasa's plans for the venue and the police and council's concerns over the previous owners and criminal activities were all discussed. Along with these discussions a proposed list of licensing conditions for a venue in a CIZ who's previous employees had have been arrested for drug offences was raised.

Below is a set of conditions that I believe will allow the venue to trade, uphold the licensing objectives and hopefully remove any concern of the previous workers / license holder causing any issues.

Personal License Holder

The sale of alcohol to drunken people and children is a major concern to Police and highlighted in the governments Alcohol Harm Reduction Strategy. Those who sell or provide 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 a basic requirement to help deter and detect criminal activity for all reputable license holders. Therefore a decent quality CCTV system is an essential tool and should be installed and maintained in accordance with Home Office Guidance. The system should be fully operational during the hours of business, with a member of staff present who can operate and if required download footage upon request of the police or other recognised authority.

Police Representations

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.
2. CCTV camera shall be installed to cover all the entrances and exits 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 for trading. This staff member shall be capable of making copies and downloading any footage immediately requested by the police of authorised Brent council officials.
4. The CCTV system shall display on any recordings the correct date and time of the recording.

5. 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 and all areas where alcohol is sold from.

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 suitable intruder alarm complete with panic button shall be fitted and maintained.

8. A 'Challenge 25' policy shall be adopted and adhered to at all times.

9. An incident log shall be kept at the premises and made available for inspection on request to an authorised officer of Brent Council of the police, which will record the following:

- a) Any complaints received.
- b) Any incidents of disorder.
- c) Any faults in the CCTV system.
- d) Any visit by a relevant authority or emergency service.

Any inputs recorded in this log shall be done within 24 hours of the incident

10. A refusal book detailing date and time of the refused sale (of alcohol), 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 by authorised officers from Brent Council or the police.

Any inputs recorded in this log shall be done within 24 hours of the incident

11. All staff working at the venue shall be trained on the basic / relevant licensing laws by a qualified licensing agent. This training shall be done every six months and documented and made available immediately upon request to the police or authorised officers from Brent Council. In addition to this the training records shall also contain the following information.

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

The need of a qualified licensing agent to conduct this training is only required for the first year of trade. After this time the training shall be conducted by the DPS.

12. 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.

13. There shall be no high strength beers, lagers, and ciders above 6.0% ABV shall be stocked or sold.

14. There shall be no single cans of beer, lager or cider shall be sold at the premises, individual glass bottles of premium beer or lager are permitted.

15. There shall be no miniatures under 35cl of spirits or wine sold at the premises.

16. A personal license holder shall be present in the store any time the venue is open to the public.

17. All alcoholic drinks shall be clearly labelled with the name of the premises

18. A sign stating “No proof of age – No sale” shall be displayed at the point of sale

19. 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. No ID – No delivery.

20. The following persons shall not be permitted to work at the venue in any capacity – [REDACTED]
[REDACTED]. Every effort should be made by staff at the venue to refuse access to these people. If entry is gained, they should be asked to leave, and this should be recorded in the incident management log. This condition does not stop the leasing of the said venue from [REDACTED] to any other individual [REDACTED]

21. The licensee shall ensure all public areas within (5) metres of the premises are cleared of litter arising from the premises daily.

If the above conditions are met in full, police would be able to withdraw representations.

Yours Sincerely,

PC Phil Graves 3122NW
NW BCU - Brent Licensing
Philip.Graves@met.police.uk