

Sent: 28 February 2026 16:02

To: Business Licence <business.licence@brent.gov.uk>

Subject: Representation Letter – Request for Refusal + Fallback Conditions + Redaction Request

To: Licensing Team, Brent Council

Re: Representation Opposing New Premises Licence – *API AVI Convenience Store*, 383 Church Lane, NW9 8JB

Application No.: 37419

Consultation End Date: 17 March 2026

Dear Licensing Team,

I am writing to make a formal representation regarding the new premises licence application for the supply of alcohol at **API AVI Convenience Store, 383 Church Lane, NW9 8JB**.

My representation is based on the **four licensing objectives**, with particular concern for **crime and disorder, public nuisance, public safety, and the protection of children from harm**. Given the history of this premises, I respectfully request that the licence be **refused**.

1. Prevention of Crime and Disorder

This address has a **long and serious history of licensing breaches** under previous operators. Brent Council has previously:

- **Revoked a premises licence** at this same address following a Metropolitan Police closure order, stating that continued operation would *undermine all licensing objectives*.
- Imposed **strict conditions** on another operator due to police concerns and repeated compliance failures.

These actions demonstrate a pattern of **non-compliance, enforcement intervention, and alcohol-related disorder** linked to this location. Granting a new alcohol licence at a premises with this history presents a **significant risk of recurring issues**, especially given the high footfall and vulnerability of the surrounding area.

2. Prevention of Public Nuisance

Previous operators at 383 Church Lane generated persistent nuisance, including:

- Congregation outside the shop
- Noise disturbance
- Littering and alcohol-related antisocial behaviour

Residents experienced repeated disruption, and the premises required council and police involvement. Reintroducing alcohol sales at this location risks **re-establishing the same pattern of nuisance**, particularly as the application seeks permission for off-sales.

3. Public Safety

The premises is located on a **busy stretch of Church Lane**, with:

- Heavy pedestrian traffic
- A bus stop directly outside
- A history of loitering and street drinking linked to previous licence holders

Reintroducing alcohol sales at a site with a proven record of enforcement problems raises concerns about **public safety**, especially during peak hours and evenings.

4. Protection of Children from Harm

The area includes:

- A nearby primary school
- Several tuition centres
- Families walking along Church Lane throughout the day

Past issues at this premises included behaviour that was **not compatible with safeguarding children**, including street drinking and disorder. Granting a new licence risks exposing children to similar harms.

Primary Position: The Licence Should Be Refused

Given the **significant enforcement history**, the **revocation of a previous licence**, and the **clear risk of undermining the licensing objectives**, I respectfully request that Brent Council **refuse this application in full**.

Fallback Position: Conditions Only If the Licence Is Granted

If the Licensing Committee is nevertheless minded to grant the licence, I request that the following conditions be imposed to prevent recurrence of the issues historically associated with this premises. These conditions are proposed **strictly as a fallback** and do not alter my primary position that the application should be refused.

- **No single cans or miniature bottles** to prevent street drinking.
- **No beers, lagers or ciders above 6% ABV.**
- **CCTV covering inside and outside**, with 31-day retention and staff trained to operate it.
- **A refusals log and incident log**, available to police and council officers on request.
- **Challenge 25 policy**, with staff training every 6 months.
- **No alcohol displayed near the entrance** to reduce theft and loitering.
- **No alcohol sales after 22:00**, even if the shop remains open later.
- **A named DPS present for at least 30 hours per week**, ensuring active management.
- **No deliveries of alcohol between 20:00 and 08:00.**
- **No external advertising of alcohol**, including posters or illuminated signs.

Yours faithfully,