



**METROPOLITAN
POLICE**

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TERRITORIAL POLICING

The Licensing Authority

*Brent Civic Centre
Engineers Way
Wembley
Middlesex
HA9 0FJ*

Your ref: 16618

Our ref: 01QK/374/19/3302

Brent Borough Licensing Department

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Date: 21st July 2019

Police representation to the Premises Licence application for 'Claypots, 531-533, High Road, Wembley, Brent, HA0 2DJ'.

I certify that I have considered the application shown above and **I 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.

I am 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 **I would withdraw my representation.**

**Police Officer: Paul Scott
Licensing Constable PC 3302NW**

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 premises licence under section 17 of the act.

The Police representations are primarily concerned with crime and disorder, public safety, the prevention of public nuisance and the protection of children from harm.

On Friday 19th July 2019, police attended the venue and met with the applicant, Ms. Saroja Stanley Fernando to discuss aspects of the new licence application and proposed use of the venue. The application stated the business hours of the premises to be for a twenty four (24) hour period and the supply of alcohol to match. I expressed serious concerns over this. It was accepted that this is a new venture for the applicant, but being a twenty four (24) hour restaurant would not meet the licensing objectives.

The venue consists of two floors. The ground floor will be a restaurant with a buffet style breakfast and lunch menu and the evening menu would be a waiter/waitress service. The downstairs area would be a function room that could be hired out for private parties. This would also include the serving of food and would not be a 'nightclub'. It was discussed that this would have to be managed correctly, with a booking procedure for customers hiring the venue. Licensable activities should also cease thirty (30) minutes prior to the closing time to allow customers to finish their meals and drinks and therefore stagger dispersal.

Seasonal variations were also discussed with the premises wanting to extend their hours during certain times of the year.

In relation to the separate restaurant and function room, police have included some additional conditions that should be included to assist defining the two separate areas and support the licensing objectives.

Police require the following points should be included in the operating schedule or added as conditions on the premises licence.

Closed Circuit Television (CCTV)

Good quality CCTV is essential as a deterrent for the prevention of crime and the detection of offenders. It allows for both covert and overt monitoring of the premises. With proper signage, this reassures both staff and clientele, that this is a safe environment where illegal activities are not tolerated.

All cameras and recording equipment will be installed and maintained in accordance with Home Office Guidance and the manufacturer's instructions and will be fully operational when the premises are open to the public.

Notices shall be displayed at the entrance to the premises, and in prominent positions throughout the premises, advising that CCTV is in operation.

Operating Hours to be displayed on Premises

A notice displaying the opening hours, the type of licensing activity and licence conditions should be clearly displayed and visible to anyone outside the premises. This may be incorporated in the summary of the licence, which must be displayed, or take the form of a separate item. Likewise the name of the Designated Premises Supervisor (D.P.S.) should be similarly displayed. This will allow the Police and other responsible authorities to readily identify the licence details. Clearly displayed opening hours will also reduce any confusion for customers prior to entering the premises and possible conflict when the premises close/stop selling alcohol.

Hours for the sale of Alcohol

This restaurant is located in an area that has regularly had issues and continues to have issues regarding anti-social behaviour and street drinkers. Wembley High Road and surrounding streets also sees a high proportion of crime, particularly around alcohol related crime. The night time economy in and around the High Road often has a number of drunken crime related matters.

This is an issue that the police are working hard to eradicate and Police consider in order to promote the licensing objectives in particularly to prevent crime and disorder, the prevention of nuisance, public safety and the protection of harm to children, that the authorised sales of alcohol do not begin daily until 10.00 hours and finish at 23.30hrs between Monday and Wednesday. Between Thursday and Sunday these timings would differ slightly. The authorised sales of alcohol would begin at 10.00hrs and finish at 01.30hrs.

It is proposed that there is a half hour drinking up time before the venue shuts to the public. Customers need a wind down period when music and entertainment has stopped, and a time to consume beverages. This also allows for orderly dispersal from the venue. Police recommend a thirty minute time difference between when licensable activities cease and when the premises closes to the public.

Personal Licence Holder

The sale of alcohol to drunken people and children is a major concern to police and is highlighted the Governments Alcohol Harm Reduction Strategy. Those who sell alcohol should be fully aware of the legislation and issues around alcohol and should be fully trained to a national standard.

Open Containers and Areas for the Consumption of Alcohol

Customers will not be permitted to take open containers outside the premises, as defined in the plan submitted with the operating schedule and approved by the Responsible Authorities. The consumption of alcohol will be restricted to those parts of the premises identified on the plan submitted with the operating schedule and approved by the licensing authority.

The Hire of a Private Function Room

It is imperative that the function room at the venue is managed correctly. Details of all outside hirers shall be logged and kept at the premises and made available for inspection by police and relevant authorities upon request. These contact details shall include; full name, address, telephone numbers and email addresses. For private hire of the function room, SIA should be employed to control order within the premises.

Police require the following points should be added as conditions on the premises licence as below.

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. This must comply with the Data Protection Act including signage.

The CCTV system shall display on any recordings the correct date and time of the recordings.

CCTV camera shall be installed to cover the entrance of the premises and further cameras installed to cover the full interior of the premises.

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.

The CCTV system shall be capable of obtaining clear facial recognition images and a clear head and shoulders image of every person entering or leaving the premises.

The CCTV images shall be kept in an easily downloadable format.

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

A sign stating "No proof of age – no sale" shall be displayed at the point of sale.

Notices asking customers to leave quietly shall be conspicuously displayed at all exits.

Alcohol shall only be provided as an accompaniment to a main meal in the restaurant area as defined on the plans submitted to the licensing authority.

Any staff directly involved in selling alcohol for retail to consumers, staff who provide training including managers shall undergo regular training of the Licensing Act 2003 legislation. The training shall be documented and signed off 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.

Customers shall not be permitted to take any open drink containers outside the premises as defined on the plan submitted to and approved by the Licensing Authority.

Door supervisors shall wear clothing that can be clearly and easily identified on CCTV.

Door supervisors of a suitable gender mix shall be employed from 21.00hrs on any day when the premises are open past midnight.

A register/log containing the names, badge number, dates and times of duty security staff and any incidents that occur shall be kept and made available to the Police and Licensing Authority.

The designated smoking area (DSA) shall be located at the front of the premises facing the High Road, Wembley.

Patrons permitted to temporarily leave and then re-enter the premises, e.g. to smoke, shall be limited to seven (7) persons at any one time.

No entry or re-entry shall be permitted after 23.00hrs until the premises closes to the public.

Alcohol shall only be provided as an accompaniment to a main meal.

There shall be no vertical drinking on the premises.

All windows shall remain closed during any licensable activity.

A personal licence holder shall be present on the premises and supervise the sale of alcohol throughout the permitted hours for the sale of alcohol after 20.00hrs.

A copy of the premises licence summary including summary including the hours which licensable activities are permitted shall be visible from the outside of each entrance to the premises.

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:

- 1) All crimes reported to the venue.
- 2) Any complaints received.
- 3) Any faults in the CCTV system.
- 4) Any visits by a relevant authority or emergency service.
- 5) Any refusal of the sale of alcohol.
- 6) Any incidents of disorder.
- 7) All seizures of drugs or offensive weapons.

All doors and windows shall remain closed during any licensable activities.

All deliveries shall take place during normal working hours (i.e.09.00hrs to 18.00hrs daily).

No children shall be permitted on the premises unless accompanied by a responsible adult. All children must leave the premises by midnight.

On Major football event days at Wembley Stadium, the following shall apply unless agreed in advance in writing with the Metropolitan Police and subject to an appropriate risk assessment.

Customers shall not be able to congregate outside the premises.

The DPS on duty shall work in partnership with the police and if necessary comply with any direction given by a senior Police Officer on duty at the event.

No drinks shall be served in glass containers, but decanted into plastic, polycarbonate or toughened plastic drinking vessels.

A personal licence holder shall be present at the premises on football event days to supervise the sale of alcohol.

Sales of alcohol shall cease one (1) hour prior to the designated kick-off time and not re-open for the sale of alcohol until fifteen (15) minutes after kick –off.

Reduction of Permitted Hours

Police propose the following hours for licensable activities:

Regulated Entertainment

Monday - Wednesday – 11.00hrs – 23.30hrs

Thursday – Sunday – 11.00hrs – 01.30hrs

Performance of Dance

Sunday – Thursday – 11.00hrs – 23.30hrs

Friday – Saturday – 11.00hrs – 01.30hrs

Late Night Refreshments

Sunday – Thursday – 23.00hrs – 23.30hrs

Friday – Saturday – 23.00hrs – 01.30hrs

Supply of Alcohol

Sunday – Thursday – 10.00hrs – 23.30hrs

Friday – Saturday – 10.00hrs – 01.30hrs

Hours Premises is Open to the Public

Sunday – Thursday – 07.00hrs – 00.00hrs

Friday – Saturday – 07.00hrs – 02.00hrs

Seasonal variations: New Year's Eve and Diwali until 03:00am the following day with 30 minutes wind down.

Yours Sincerely,

**Paul Scott PC 3302NW
Licensing Constable – Brent Police.**