

Mrs Mumtaz Somji  
Blue Cross Group Ltd  
Eastern European Food & Wine  
297 Harrow Road  
Wembley  
HA9 6BD

19 December 2019

**Licensing Representation to the Application for a new Premises Licence for Eastern European Food & Wine, 297 Harrow Road, Wembley, HA9 6BD**

I certify that I have considered the application shown above and I wish to make a representation.

**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 variation to a premises licence under section 34 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.

**Street Drinking**

High strength alcohol has been an issue in the area for a number of years and has contributed to alcohol related anti-social behaviour, specifically that associated with drinking. The main issue with permitting premises to sell high strength alcohol is the fact that quite often licence holders and their employees struggle to work out who is and is not a street drinker but when this is then brought to their attention by officers, they relinquish any responsibility associated to the street drinking because street drinkers no longer look the same in appearance as they did some years ago. By removing all low cost high strength alcohol, this removes the pressure from licence holders and the DPS and goes some way in resolving the issues in street drinking.

**High Strength Alcohol**

In order to permit high strength beer, lager or cider, the licensing authority would need to restrict this to **three** brands of alcohol. These three brands of alcohol would need to be kept behind the counter out of

---

reach of customers so that they would have to ask for the alcohol. This would give members of staff an opportunity to engage with customers and offer a better chance of assessing and making a decision in whether they should be served the alcohol. Usually customers select the alcohol from a fridge in the main sales area, place their money on the counter without having to say a word and this would therefore avoid this.

If you would like to serve alcohol, this is the condition under which the Licensing authority would be happy to allow high strength alcohol. If you reply and let me know which three names you would propose, I will then consider each of them.

In addition the Licensing Authority would require the following conditions be removed from the existing licence, the ones that would remain and the additional ones that would be added:-

### **Existing Premises Licence Conditions to be Removed**

1. CCTV shall be installed and maintained in a working condition.
2. All CCTV recordings shall be kept for 31 days and shall be made available to police and licensing officers if requested.
5. No high strength beers, lagers, and ciders above 5.5% ABV shall be stocked.

### **Existing Premises Licence Conditions to Remain on the Premises Licence**

3. 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.
4. 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.
6. "Raid Control" crime prevention measures shall be installed and all staff given suitable training.
7. A "Challenge 21" policy shall be adopted and adhered to.

### **Premises Licence Conditions to be Added**

*The Licensing Authority require the following points to be included in the operating schedule or added as conditions on the premises licence:*

1. CCTV cameras shall be installed to cover the entrance of the premises, the ENTIRE server counter, till and the units behind the counter.
2. CCTV shall be installed to Home Office Guidance standards and maintained in a good working condition and recordings shall be kept for 31 days. The recordings shall be made available to Police and authorised officers from Brent Council upon request.
3. 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.
4. A member of staff shall always be present on the premises whilst they are open who is capable operating the CCTV system and able to facilitate immediate viewing of CCTV footage upon the request of the Police and Authorised Officer of the Licensing Authority.
5. The CCTV monitor screen showing all cameras shall be available on the shop floor and visible to customers.

6. An age verification scheme, such as Challenge 25, shall be implemented at the premises at all times.
7. A sign stating "No proof of age – No sale" shall be displayed at the point of sale.
8. Regular (every 12 months) documented staff training on licensing legislation and operating procedures shall be given. The training shall be signed and dated and a copy of these training records available for inspection by Police and local authority enforcement officers.
9. A clear and unobstructed view into the premises shall be maintained at all times.
10. 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 crime reported to the venue
  - b) Any complaints received in respect of the sale and consumption of alcohol
  - c) Any faults in the CCTV system
  - d) Any refusal of the sale of alcohol
  - e) Any visit by a relevant authority or emergency service.
11. No high strength beers, lagers, and ciders above 6.0% ABV shall be stocked or sold, with the exception of three named alcohol (NAME 1, NAME 2, NAME 3), which must be stocked behind the servery counter.
12. No single cans of beer, lager or cider shall be sold.
13. A suitable intruder alarm complete with panic button shall be fitted and maintained.
14. An age till prompt system shall be utilised at the premises in respect of age restricted products.

In order for the Licensing Authority to withdraw this representation, it will be necessary for you to confirm that you accept the above removal and additional conditions in writing. I also await your three suggested high strength alcohols you would like to serve.

Yours sincerely



Susana Figueiredo  
Licensing Inspector  
Regulatory Services