



Licensing Authority
River Park House
Level 1 North
225 High Road
London
N22 8HQ

Licensing Unit
Edmonton Police Station
462 Fore Street,
London
N9 0PW

PC Peters 2549 NA
[NAMailbox-
Licensing@met.police.uk](mailto:NAMailbox-Licensing@met.police.uk)
20th August 2024

POLICE REPRESENTATION

Application for a Premises License

12th streets Burgers and Shakes, 57, High Road, London, N22 6BH

I write on behalf of the Commissioner of the Metropolitan Police.

This application is submitted by Umer Fayyaz as the director of SQP Traders Ltd.

Current times requested for the premises are:

Provision of Late Night Refreshment

Monday to Sunday **23:00 to 06:00**

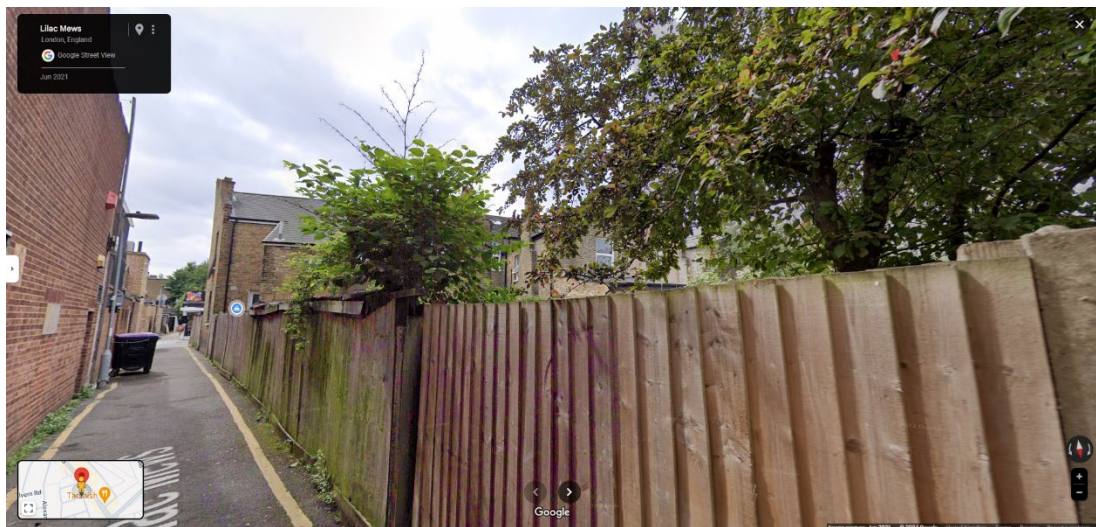
The hours open to the public:

Monday to Sunday **09:00 to 23:00**

I wish to make representations to against this application, because if granted I believe the following licensing objectives will fail to be upheld:

- **Prevention of Public Nuisance.**
- **Prevention Crime & Disorder.**

This front of this premises is on a high street, with residential apartments on the first and second floors. The rear exit of the property is on Lilac Mews, an alleyway that runs parallel to High Road, the other side of the alleyway are the back gardens of residential properties. Below are pictures of the premises from the front, and the view from the rear exit looking left and right.



The applicant is requesting a license for the provision of late night refreshment for 6 hours, which is a significant length of time. The provision of late night refreshment to 06:00 collected by delivery drivers from the rear exit on Lilac Mews, is very likely to cause a public nuisance problem to nearby residents. The rear exit is next to residential properties on Courcy Road and Coleraine Road, in the late night the delivery drivers' engine noise will carry over to these properties, and will have a disruptive impact on resident's ability to sleep.

Furthermore, the schedule states that anti-social behavior will not be tolerated, but does not outline anything specific that will be done. Lilac Mews is a narrow and secluded road, and there is a high risk of drivers congregating at the rear exit. Any congregating is likely to cause

anti-social behavior, in the form of idling engines, loud talking, littering, and is a pull for criminal behavior out of public view, such as drug use or dealing. The applicant has not provided any specific measures the premises will undertake to prevent these problems, only that delivery drivers "will leave the premises immediately", which gives anyone little confidence that he has an adequate strategy in place for this risk.

Similarly, the application states that there will be "CCTV installed to make sure everything is recorded and goes smoothly", without providing for how it will run smoothly. CCTV installation in any situation does not by itself prevent crime, and should not be used as a substitute for a coherent crime prevention strategy.

He is expected under the statutory guidance to provide positive proposals for how they manage the likely risk. Instead, the operating schedule is only one paragraph, which is then copied and pasted onto other parts of the application. This schedule has no concrete conditions for the premises to abide by. A superficial mention is made to the licensing objectives and no mention of the local authority's statement of licensing. This leaves me with no confidence that the applicant understands the licensing objectives and that he knows what is needed to uphold them.

Due to the concerns that police have for the risk of public nuisance and crime and disorder, and because planning permission does not allow for operating times beyond 00:00. We the police suggest the following operating hours would be more suitable for the location of the premises:

Provision of Late Night Refreshment

Monday to Sunday **23:00 to 00:00**

The opening hours of the premises:

Monday to Sunday **09:00 to 00:00**

Furthermore, we ask that the following conditions be added to the operating schedule, to assist the premises in upholding the licensing conditions:

For the Prevention of Public Nuisance:

1. Provision of food to customers and delivery drivers shall be done from the front entrance only. There is to be no use of the rear entrance for the collection of takeaway food from customers or delivery drivers.
2. Delivery drivers shall be given clear, instructions to use their vehicles in a responsible manner so as not to cause a nuisance to any residents or generally outside the license premises; not to leave engines running when the vehicles are parked; and not to obstruct the highway. A sign to this effect will be displayed at the entrance to the premises.
3. Staff shall actively discourage patrons from congregating around the outside of the premises.
4. The premises licence holder shall ensure that the pavement from the building line to the kerb edge immediately outside the premises, including the gutter/channel at its junction with the kerb edge, is kept clean and free from litter at all material times to the satisfaction of the Licensing Authority.

For the prevention of crime and disorder:

1. A digital CCTV system shall be installed in the premises and shall comply with the following criteria:

- (a) Camera(s) must be sited to observe the front entrance doors from both inside and outside, the rear entrance on Lilac Mews from the outside.
- (b) Camera(s) on the entrances must capture full frame shots of the heads and shoulders of all people entering the premises i.e. capable of identification.
- (c) Camera(s) must be sited to cover all areas to which the public have access, excluding toilets if onsite.
- (d) Provide a linked record of the date, time of any image.
- (e) Provide HD digital quality images in colour during opening times.
- (f) Have a monitor to review images and recorded quality.
- (g) Be regularly maintained to ensure continuous quality of image capture and retention.
- (h) A Member of staff will be trained in operating CCTV at the premises during premises operating times, and where requested by police officers shall be served to them in the form of a CD/DVD.
- (i) Recorded footage shall be made available for a minimum of 30 days.

Conclusion

In summary police oppose this application, a premises choosing to provide late night refreshment until 06:00 via the rear exit, is likely to cause a significant amount of public nuisance to nearby residents, and become a pull for crime and disorder. Therefore, the applicant in his operating schedule needs to go to great and detailed lengths to demonstrate to licensing authorities that he will not compromise the licensing objectives. The applicant has not done this, and has only given short superficial statements, which gives little reassurance to police. Therefore, It is feared that without adequate premises conditions being in place and implemented, control of the premises could easily be lost and a risk posed to the wider community.

If the applicant agrees to the addition of these conditions and changes to the hours, we will withdraw our representation. We reserve the right to provide further information to support this representation.

Yours faithfully,



Police Constable Francis Peters

