



Coventry City Council

Application for the review of a premises licence or club premises certificate under the Licensing Act 2003

PLEASE READ THE FOLLOWING INSTRUCTIONS FIRST

Before completing this form please read the guidance notes at the end of the form.
If you are completing this form by hand please write legibly in block capitals. In all cases ensure that your answers are inside the boxes and written in black ink. Use additional sheets if necessary.
You may wish to keep a copy of the completed form for your records.

I Andrew Tandy, Trading Standards Officer, Coventry City Council

(Insert name of applicant)

apply for the review of a premises licence under section 51 / apply for the review of a club premises certificate under section 87 of the Licensing Act 2003 for the premises described in Part 1 below (delete as applicable)

Part 1 – Premises or club premises details

Postal address of premises or, if none, ordnance survey map reference or description

Clayton Off Licence - 8 Hales Street

Post town **Coventry**

Post code (if known) **CV1 1JD**

Name of premises licence holder or club holding club premises certificate (if known)

Surbir Singh KUKRIJA

Number of premises licence or club premises certificate (if known)

Premises Licence number LN/217000328

Part 2 - Applicant details

I am

Please tick ☐ yes

1) an individual, body or business which is not a responsible authority (please read guidance note 1, and complete (A) or (B) below)

☐

2) a responsible authority (please complete (C) below)

☒

3) a member of the club to which this application relates
(please complete (A) below)

☐

(A) DETAILS OF INDIVIDUAL APPLICANT (fill in as applicable)

Please tick ☐ yes

Mr ☐

Mrs ☐

Miss ☐

Ms ☐

Other title ☐
(for example, Rev)

Surname

First names

I am 18 years old or over

Please tick ☐ yes

☐

**Current postal
address if
different from
premises
address**

Post town

Post Code

Daytime contact telephone number

**E-mail address
(optional)**

(B) DETAILS OF OTHER APPLICANT

Name and address

Telephone number (if any)

E-mail address (optional)

(C) DETAILS OF RESPONSIBLE AUTHORITY APPLICANT

Name and address Andrew Tandy – Trading Standards Officer Trading Standards Regulatory Services Coventry City Council PO Box 7097 Council House COVENTRY CV6 9SL
Telephone number (if any)
E-mail address (optional) trading.standards@coventry.gov.uk

This application to review relates to the following licensing objective(s)

- | | |
|---|--|
| | Please tick one or more boxes ☐ |
| 1) the prevention of crime and disorder | ☒ |
| 2) public safety | ☐ |
| 3) the prevention of public nuisance | ☐ |
| 4) the protection of children from harm | ☒ |

Please state the ground(s) for review (please read guidance note 2)

The premises have been subject to a test purchase for alcohol as West Midlands Police have provided intelligence that young people below the age of 18 had been buying alcohol from the premises. This was confirmed via CCTV examined by West Midlands Police at the premises. A warning letter was issued in November 2025 reiterating the need to examine proof of identity.

The Licensing Department of Coventry City Council sent a letter to the DPS and Premises Licence holder relating to a visit on 25th November 2025 regarding a breach of the licence conditions relating to period of retention of CCTV footage and the need for a refusals register.

An advisory letter was sent by Trading Standards team of Coventry City Council in April 2026 regarding underage sales.

On 27th May 2026 a test purchase took place, and a can of Smirnoff Ice 250ml 4% alcohol was sold by the DPS / Premises licence holder for £2. The purchaser was 16 years old

On 2nd June 2026 Trading Standards revisited the premises and seized counterfeit goods and illegal vapes. Trade mark holders have verified that the goods seized are counterfeit. Vapes seized did not comply with the requirements to be refillable, rechargeable and to have a replaceable coil. An age of sale of tobacco products sign was provided as one was not displayed. The shop displayed general challenge 25 notices. Additionally, 31 adapters and multi-sockets were seized due to the incorrect size of the plug required under safety legislation.

Offences have been committed under the;

Licensing Act 2003 – Section 146

Children and Young Persons (Protection from Tobacco) Act 1991 section 4
Trade Marks Act 1994 section 92
Digital Markets, Competition and Consumers Act 2024 – Part 4 – Section 226/237
The Plugs and Sockets etc. (Safety) Regulations 1994 regulations 4 and 10

The sales of these products undermine fair competition with legitimate local traders who are complying with the law.

Conditions on the premises licence have been breached regarding underage sales and sale of goods that are not authentic.

A letter was sent to the premises licence holder on 20th June 2026 seeking his comments on these matters.

The applicant on behalf of the trading standard team states the grounds for this review are therefore based upon the sale of alcohol to a 16-year-old young person, the possession of counterfeit products for sale, the possession of illegal vapes and failure to display a notice of the age of sale of tobacco products.

Please provide as much information as possible to support the application (please read guidance note 3)

On 28th November 2025 West Midlands Police Licensing & Regulatory Services Officer wrote to Clayton Off Licence 8 Hales Street, Coventry regarding concerns about the management of the premises. CCTV evidence shows a 14-year-old young person buying a bottle of vodka and a WKD, and an accompanying underage person purchased a vape. Neither were challenged for photographic identification. Later an ambulance was called to administer first aid to the 14-year-old who had collapsed from alcohol consumption. The letter stated 'the supply / sale of alcohol to persons under 18 years is not acceptable under any circumstances and should it continue will lead to an immediate review of your licence with potential for its revocation. I would therefore ask that you take immediate action to ensure that you / your staff are fully trained and comply with all aspects of your premises licence operating schedule'.

Following a visit to the premises by a Licensing Officer of Coventry City Council on 25th November 2025, a letter was sent to Surbir Singh KUKRIJA at the premises relating to a breach of the premises licence conditions. It stated CCTV footage should be retained for 28 days, to monitor refusals using a refusals register, and staff should be trained in basic licencing laws, child sexual exploitation and conflict management. This is to be refreshed every 6 months and a Challenge 25 system to check identification is to operate.

In April 2026 West Midlands Police Neighbourhood Team Supervisor asked for the premises to be included in any test purchase work quoting concerns about a number of incidents of underage young people being 'incredibly drunk' and the premises being the suspected source of the alcohol.

On 21st April 2026 a letter of advice was sent to Surbir Singh KUKRIJA providing guidance to prevent the sale of alcohol to a young person under the age of 18 and included references to checking identification, using a refusal book and displaying posters showing the age limits for specific products.

On 27th May 2026 the test purchase took place at the premises and a can of Smirnoff Ice 250ml 4% alcohol was sold by the DPS / Premises licence holder for £2. The purchaser was 16 years old and an officer observing the sale stated that the seller did not look up from his phone and did not ask for any identification. 'Challenge 25' notices were displayed. Officers noted that there were Nokia phones on display and believed these to be counterfeit and would return to examine these later.

On 2nd June 2026 Trading Standards officers revisited the premises and seized counterfeit goods and illegal vapes. Trade mark holders have verified that the goods seized are counterfeit. 5 Nokia phones, 20 items bearing the trade mark or design rights of Apple Inc, 14 items bearing the trade mark of 'Samsung' and 24 vapes that failed to comply with labelling or reuse obligations. Nokia and Apple Inc have confirmed these seized items were counterfeit. I am awaiting a response from 'Samsung'. Additionally, you failed to display a notice stating the age of sale of tobacco products which was provided.

Vapes seized did not comply with the requirements to be refillable, rechargeable and to have a replaceable coil..

Additionally, 31 travel adapters were seized as they failed to comply with the dimensional requirements of a plug in the UK when tested with a template.

An age of sale of tobacco products sign was provided as one was not displayed. The shop displayed general challenge 25 notices

Offences have been committed under the;

Licensing Act 2003 – Section 146

Children and Young Persons (Protection from Tobacco) Act 1991 section 4

Trade Marks Act 1994 section 92

Digital Markets, Competition and Consumers Act 2024 – Part 4 – Section 226/237

The Plugs and Sockets etc. (Safety) Regulations 1994 regulations 4 and 10

The premises licence includes conditions agreed with responsible authorities. With the Police 'Refusals are to be monitored and documented', 'Challenge 25 is to operate at the premises. With Trading Standards 'Goods in possession or sold should not evade any duty or taxes and should be authentic goods that are permissible to be sold for consumption in the UK market'.

The Operating Schedule includes under

- (a) General. – All four Licensing Objectives 'We will not sell alcohol to anyone that is under the age of 18, or anyone that is intoxicated'.
- (b) The prevention of crime and disorder 'There will also be a warning notice to deter any criminal activity. We will not sell alcohol to anyone that is under the age of 18, or anyone that is intoxicated'.
- (c) Public safety 'We have well trained staff members who will ensure that acceptable forms of ID verification will be photographic and challenge 25 will be adapted'
- (e) The protection of children from harm 'We will adopt challenge 25 policy and photographic ID verification will be in place'.

The comments of the premises licence holder were sought in a letter sent on 30th June 2026. On 7th July 2026 a response was received and stated that their compliance had been strengthened and they were reviewing suppliers. Staff members had been reminded about their legal responsibilities relating to underage sales and they had reinforced the Challenge 25 policy. by providing refresher training on age verification and refusing sales where valid identification is not produced. Invoices were provided for some of the seized items, but these did not display sufficient information to identify the supplier.

Photographs relating to the visits by Trading standards are in the schedule to this application.

Conclusion

Following advice from West Midland Police and Trading Standards, an underage sale of alcohol took place with the seller paying no attention to the purchaser and not checking identification.

The possession for sale of various illegal products shows a lack of diligence when sourcing these products with no evidence of any checks being made.

It is the opinion of the applicant that:

- The circumstances of this case should be considered particularly seriously as detailed in [paragraph 2.28](#) of the statutory guidance in relation to protection of children from harm states 'the Government believes that it is completely unacceptable to sell alcohol to children' .
- Under paragraph 11.27 of the statutory guidance it states 'There is certain criminal activity that may arise in connection with licensed premises which should be treated particularly seriously. *These are - the use of the licensed premises: for the illegal purchase and consumption of alcohol by minors which impacts on the health, educational attainment, employment prospects and propensity for crime of young people*';
- Conditions and the operating schedule have not been adhered to.
- The premises licence holder did not adhere to the licencing objectives of the protection of children from harm of the prevention of crime and disorder.

The officer requests the following action to be considered in this instance

1. Revocation of the premises licence

Have you made an application for review relating to the
no
Premises before?

Please tick ☒ ☐

If yes please state the date of that application

Day	Month	Year

If you have made representations before relating to the premises please state what they were and when you made them

tick ☐ yes

Please

- I have sent copies of this form and enclosures to the responsible authorities and the premises licence holder or club holding the club premises certificate, as appropriate



- I understand that if I do not comply with the above requirements my application will be rejected ☒

IT IS AN OFFENCE, UNDER SECTION 158 OF THE LICENSING ACT 2003, TO MAKE A FALSE STATEMENT IN OR IN CONNECTION WITH THIS APPLICATION. THOSE WHO MAKE A FALSE STATEMENT MAY BE LIABLE ON SUMMARY CONVICTION TO A FINE OF ANY AMOUNT.

Part 3 – Signatures (please read guidance note 4)

Signature of applicant or applicant's solicitor or other duly authorised agent (please read guidance note 5). **If signing on behalf of the applicant please state in what capacity.**

Signature 
.....

Date 07/07/2026
.....

Capacity Trading Standards Officer (Agency)
.....

Contact name (where not previously given) and postal address for correspondence associated with this application (please read guidance note 6)	
Post town	Post Code
Telephone number (if any)	
If you would prefer us to correspond with you using an e-mail address your e-mail address (optional)	

Notes for Guidance

1. A responsible authority includes the local police, fire and rescue authority and other statutory bodies which exercise specific functions in the local area.
2. The ground(s) for review must be based on one of the licensing objectives.
3. Please list any additional information or details for example dates of problems which are included in the grounds for review if available.
4. The application form must be signed.
5. An applicant's agent (for example solicitor) may sign the form on their behalf provided that they have actual authority to do so.
6. This is the address which we shall use to correspond with you about this application.

Schedule

Image 1 – Alcohol purchased by 16-year-old



Image 4 – Vapes illegal in UK market



Image 5 [Google Streetview of Premises \(June 2023\)](#)



Comments made by the Premises Licence Holder

I write in response to your letter dated 30 June 2026 regarding the inspection carried out at Clayton Off Licence.

Firstly, I take these matters very seriously and appreciate the opportunity to respond.

Since the inspection, I have reviewed our procedures and have taken immediate steps to strengthen our compliance with all relevant legislation. We are also reviewing our suppliers to ensure all future stock is sourced from reputable wholesalers and that appropriate records are maintained.

Regarding the alleged underage sale, I sincerely regret that this incident has been brought to my attention. It does not reflect the standards expected within our business. We have reminded all staff of their legal responsibilities and have reinforced our Challenge 25 policy by providing refresher training on age verification and refusing sales where valid identification is not produced.

Please find attached copies of the invoices available for the products referred to in your letter. Should you require any further documentation or clarification, I will be happy to provide it.

We remain committed to working constructively with Trading Standards and the Licensing Authority to ensure full compliance going forward and respectfully ask that our cooperation and the steps we have taken to strengthen our procedures are taken into consideration.

Invoices supplied

NAME					DATE	
ADDRESS					4.4.26	
					SOLD BY	
CASH	C.O.D.	CHARGE	PAID ON ACCT.	MOSE RET.	PAID OUT	No 7074723

QUAN.	DESCRIPTION	PRICE	AMOUNT
112	Bir Go ② 5x56	140	44.8
2	bx 14x	14	14
3			
4			
5	Ref label Tax	3	15
6	Gov 1/2 Kg	1.25	7.5
④	Saga - Gift Card	1.25	5
5	4m 2m 5x Lead	3	15
5	4m 5m 5x Lead	5	25
10			
11			112.30
12	old CR 19.2.26	—	14.40
13			
14			97.90
15			
16			
17			
18			
19			
20			
21			
22			

CUSTOMER'S ORDER NO.

RECEIVED BY:

as
 Vape 4K puff 20 x 4 - 80
 1 9K puff 10 x 4 - 40
 Self Board 15 x 1.50 - 22.50
 142.50

ADDRESS						DATE	8/4/20	
CASH						SOLD BY		
C.O.D.						No 1085147		
CHARGE								
PAID ON ACCT.								
MDSE RET.								
PAID OUT								
QUAN.	DESCRIPTION					PRICE	AMOUNT	
32	1	Vape Board				1.25	40	
6	2	POL CARD				2	12	
	3						52	
	4							
	5							
	6							
	7							
	8							
	9							
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CUSTOMER'S ORDER NO.						RECEIVED BY:		

Revised guidance issued under section 182 of the Licensing Act 2003 (November 2025)
(accessible version)

11.27 There is certain criminal activity that may arise in connection with licensed premises which should be treated particularly seriously. These are the use of the licensed premises:

- for the sale and distribution of drugs controlled under the Misuse of Drugs Act 1971 and the laundering of the proceeds of drugs crime;
- for the sale and distribution of illegal firearms;
- for the evasion of copyright in respect of pirated or unlicensed films and music, which does considerable damage to the industries affected;
- for the illegal purchase and consumption of alcohol by minors which impacts on the health, educational attainment, employment prospects and propensity for crime of young people;
- for prostitution or the sale of unlawful pornography;
- by organised groups of paedophiles to groom children;
- as the base for the organisation of criminal activity, particularly by gangs;
- for the organisation of racist activity or the promotion of racist attacks;
- for employing a person who is disqualified from that work by reason of their immigration status in the UK;
- for unlawful gambling; and
- for the sale or storage of smuggled tobacco and alcohol.