

**THE LICENSING ACT 2003
REPRESENTATION FORM FOR “RESPONSIBLE AUTHORITY”**

Please delete as applicable: **LICENSING AUTHORITY**

Your name	Alex Beebe
Job Title	Environmental Health Officer (Commercial & Licensing)
Postal Address (inc post code)	Cambridge City Council PO BOX 700 Cambridge CB1 0JH
Contact telephone number:	[REDACTED]
Mobile Number:	N/A
Email address:	[REDACTED]

Name of Premises you are making a representation about:	Neluxa Sparkles
Address of the premises you are making a representation about:	103 Cherry Hinton Road Cambridge CB1 7BS

This section is about your representation/s. They must relate to one or more of the Licensing Objectives. Please detail the evidence supporting your representation, (under the relevant headings) and the reason for your representation/s. *It is important that you detail all matters that you wish to be considered. (Use additional sheets if necessary). Regulations provide that in considering representations the authority may take into account documentary or other information produced by the party either before the hearing or, with the consent of all parties, at the hearing.*

Which licensing objective(s) does your representation relate to?	
The prevention of crime and disorder	Public safety
See below	N/A
The prevention of public nuisance	Protection of Children from Harm
N/A	See below

**LICENSING ACT 2003
LICENSING AUTHORITY REPRESENTATION FORM**

To: **Commercial & Licensing Team Manager**

From: **Alex Beebe**

Premises: **Neluxa Sparkles, 103 Cherry Hinton Road, Cambridge, CB1 7BS**

Reference: **Application/295770**

New premises licence application

Introduction

On 4th November 2025 the licensing authority received an application for a new premises licence for Neluxa Sparkles at 103 Cherry Hinton Road, Cambridge, CB1 7BS. The responsible authorities (for the purposes of the Licensing Act 2003) were consulted on this application and the cut-off date for receipt of representations in respect of the application is 2nd December 2025.

On 12th November 2025 Cambridgeshire and Peterborough Trading Standards raised an objection to the application. They believe the applicant will not uphold the licensing objectives, in relation to the protection of children from harm and possibly the prevention of crime and disorder.

On 21st November 2025 Cambridgeshire Constabulary raised an objection to the application. The representation has regard to the licensing objectives for prevention of crime and disorder and the protection of children from harm.

This will be the third licensing hearing associated with the premises address since April 2024.

The first review was raised by Immigration Enforcement (Home Office) in February 2024. On 20th November 2023, East of England Immigration Compliance and Enforcement (ICE) team visited the premises over concerns that the business was employing an illegal worker. The person behind the counter was found to have no permission to work and was arrested by immigration officers. This was heard by the Licensing Sub-Committee on 22nd April 2024. The Licensing Authority also submitted a representation, this objection can be view in **Appendix 1**.

At the hearing members resolved to 'leave the licence as it is' with a recommendation that the Licensing Authority support the business by undertaking a licensing inspection within 6 months. In making their decision members made the following comments:

- *"There were no objections to the new Premises Licence Holder and no evidence she would not correctly fulfil the role in accordance with the Licensing Objectives."*
- *"...The Sub Committee has considered Miss Mariflo's commitment to uphold the Licensing objectives and has decided to leave the licence as it is with the above support."*

The second review was instigated by Trading Standards under the protection of children from harm licensing objective, following a test purchase operation on 12th August 2024, where alcohol was sold to a child. On 2nd September 2024, the responsible authorities were consulted on a review of the premises licence for Luxa Sparkles off-licence. Cambridgeshire Constabulary as well as the Licensing Authority also submitted representations; the licensing authority's submission can be viewed in **Appendix 2**.

At the hearing members resolved to suspend the premises licence for a period of three months. In making their decision, members made the following comments:

- *"Members wish to be clear to the current, and any prospective premises licence holders that under-age sales of alcohol are against the law, unacceptable, and will not be tolerated in Cambridge. Should further underage sales be discovered at this premises, revocation will almost certainly result."*

Summary

To consider the application for a new premises licence application, it is key to understand and consider the complaints and timeline history associated to this premises:

Date	Occurrence
10 th December 2007	The premises licence was granted, with Mrs Mariflo being both the Premises Licence Holder (PLH) and Designated Premises Supervisor (DPS).
May 2018	<p>Two complaints:</p> <ol style="list-style-type: none"> 1. A member of staff from a local sixth form college alleged that a 17-year old student had on 25th April 2018 bought a bottle of vodka unchallenged from the premises. The student later had to be taken to hospital due to intoxication. 2. A local resident alleged the business was selling alcohol to people who were already drunk: this lead to congregations of drunk people outside the business at night-time. <p>An inspection of the premises was undertaken together with the police licensing officer. The manager was interviewed and till receipts checked, but there was no evidence of the transaction taking place. The manager</p>

	<p>was reminded of their legal duties regarding the sale of age-restricted products.</p>
January 2019	<p>A complaint was received alleging that on 26th January 2019 a group of three 14–15-year-olds had been sold three bottles of Lambrini and a small bottle of vodka. The children were not asked for ID. The complainant was the mother of one of the children. A joint visit was made with the police licensing officer on 30th January 2019. No evidence could be found of the visit/transaction in question. An advisory letter was issued to Mrs Mariflo reminding her of her responsibilities regarding the sale of age-restricted products, as well as the need to ensure compliance against the conditions attached to the licence.</p>
October 2020	<p>The Police received a complaint from a mother of a 16-year old who advised her daughter and friend were able to purchase a bottle of vodka from the business on 16th October 2020. The police licensing officer advised that the Police had also received two separate allegations in August 2020 of nitrous oxide canisters being sold to children.</p> <p>A joint visit with the police licensing officer was made on 10th November 2020 where Mrs Mariflo's husband was present with two other staff members. During the visit staff asked questions such as: whether proxy sales were allowed (parents buying alcohol on behalf of their children); whether they could accept copies of ID e.g. photographs of passports, driving licences etc. on a phone rather than originals; and, if they needed to ask for identification of young people on each occasion even if they had seen ID previously. This raised serious concerns about the level of training given to staff. Mrs Mariflo was named as the person responsible for staff training.</p> <p>An advisory letter was sent by the police licensing officer to Mrs Mariflo dated 13th November 2020. It was stressed to Mrs Mariflo that the police and licensing authority took complaints of alleged underage sales seriously, and that should evidence be obtained a review of the premises licence be sought. Due to the concerns raised during the visit as well as the history of complaints, Mrs Mariflo was requested to submit a minor variation to add two conditions to the premises licence. These conditions sought to: enhance the training given to staff members; request 6-month refresher training; maintain records of training operate a 'Challenge 25' scheme; and, maintain a refusals log.</p> <p>Mrs Mariflo responded to this letter with an e-mail dated 1st December 2020 where she disputed the allegations of underage sales. She also indicated that she would submit a minor variation application, but this never took place. It was concluded there was insufficient evidence at the time to pursue a review of the premises licence.</p>

June 2021	A complaint was received from a local resident alleging issues from noise and anti-social behaviour from congregations of inebriated individuals regularly of an evening seen outside the front of the business. The complainant alleged they had seen staff members giving alcohol and associating with those gathering. The matter was referred to the police where the local neighbourhood policing team was asked to patrol.
22 nd August 2022	Trading Standards confirmed the business failed a test purchasing operation; Mrs Mariflo received a caution for the offence and that should the business fail again, then Trading Standards would consider applying to review the premises licence.
January 2023	The Police received a report of the business allegedly selling alcohol to children at significant risk. The licensing authority and Trading Standards were duly advised.
22 nd August 2023	Underage sale of a vape took place at the premises. Luxshinii Ltd (Mrs Mariflow was the sole Director) was prosecuted by Cambridgeshire & Peterborough Trading Standards for this offence. The company pleaded guilty at Peterborough Magistrates Court on 10th April 2024.
22 nd August 2023	Illegal worker found working at the premises by Immigration Enforcement.
April 2024	Mrs Mariflo remained premises licence holder until this time at which point it was transferred to Akshayam Limited: the sole director of this company was her husband. The DPS was also changed at approximately this date to Mrs Mariflo's daughter; Luxa Shiny Sparkles. These changes took place prior to a Sub-Licensing hearing following the submission of a Premises Licence review by Immigration Enforcement, following the illegal working being found in August 2023.
22 nd April 2024	Sub-Licensing Committee hearing. Members resolved to keep the licence as it was, but requested that the licensing authority conduct a licensing inspection within 6 months to support the business.
12 th August 2024	The premises was subject to a further test purchasing operation by Trading Standards, whereby alcohol was sold to an underage volunteer.
2 nd September 2024	Trading Standards submitted a review of the premises licence.
23 rd September 2024	Prior to the review hearing, applications were submitted to transfer the premises licence and vary the DPS to Mr Sasikumar. The applications took immediate effect, as requested by the applicant.
21 st October 2024	Sub-Licensing Committee hearing. Members determined to suspend the premises licence for a period of 3 months. Additional conditions were added to the Premises Licence due to the premises gaining notoriety for under-age sale of age-restricted products, irrespective of the identity of the management/premises licence holder, as such practices were permitted by the former management. Members felt that it was appropriate and proportionate to add conditions necessary to promote the licensing objective of the protection of children from harm.

28 th October 2024	Following the Sub-Licensing Committee hearing, Mr Sasikumar made the decision not proceed with the purchase of the premises, and the DPS was changed to Mr Jeyachandran.
February 2025	Applications to vary the DPS and transfer the premises licence to Mr Mahendran were submitted.
19 th September 2025	<p>A joint licensing inspection was carried out by the Commercial and Licensing team and police licensing. This was undertaken after the police received intelligence that age restricted products were being sold to underage children, as well as reports of inappropriate staff behaviour at the premises being received. The Senior Technical Officer prearranged the visit with Mr Mahendran, stating the intention of the visit was to inspect the business and check compliance against the licensing conditions on the premises licence.</p> <p>The inspection also revealed that the interior layout had been changed without seeking permission from the licensing authority. The changes included changing the position of the cashier counter and the alcohol display where spirits were displayed.</p>
25 th September 2025	A warning letter was issued to Mr Mahendran regarding the breaches of the conditions identified during the licensing inspection on 19 th September 2025 (Appendix 3). Mr Mahendran was provided with 28 days to rectify the breaches before an unannounced visit took place thereafter.
19 th October 2025	Prior to the revisit being conducted, Mr Mahendran emailed the licensing authority stating that as of 5 th October 2025 he had not had access to the premises as the previous lease holders had changed the locks and taken the premises back. Therefore, he wished to surrender the Premises Licence.
21 st October 2025	The surrender of the premises licence (PRECAM 000531) was received and accepted by the licensing authority.
24 th October 2025	Jane Gillied (licensing agent) confirmed she is acting on behalf of Mrs Mariflo. She provided some details regarding both past and current affair at the premises and confirmed that a premises licence application would be submitted shortly.
24 th October 2025	The police licensing officer received a report that at ~7pm on 24 th October 2025 two police officers attended the business. The officers confirmed alcohol was on display and that the name of the premises had changed. They also spoke to a member of staff who confirmed they did not work there but was taking care of the shop whilst the manager was not present. When the manager was called she advised she was not present due to working a carer so they asked a neighbour to look after the shop. The officers asked for the alcohol on display to be removed.
27 th October 2025	Joint visit to the premises: no alcohol was on display, apart from a small selection covered over by a pull down blind. The lone member of staff, a female cashier, stated she was a neighbour of Mrs Mariflo. A young-looking male entered the premises and attempted to buy vape, using a photo of ID on their phone. The police licensing officer had to interject in

	the transaction to explain to the customer that he could not buy vapes with a photo of an ID.
4 th November 2025	New application submitted for 'Neluxa Sparkles'. Mrs Mariflo is listed as the intended DPS and premises licence holder.

The previous surrendered premises licence (21st October 2025) could have been transferred, if the applicant had applied within 28 days of the surrender notice being accepted by the licensing authority. It was noted the applicant decided not to apply for a transfer and opted to submit a new premises application instead. The conditions offered by the applicant appear to be fewer in number and less robust than the list of conditions that was included on the previous premises licence, following the Licensing Sub-Committee hearing on 21st October 2024. Members stated on the record of decision that the agreed conditions were necessary and proportionate to adequately promote the licensing objectives.

Since the hearings in 2024 (April and October), the licensing authority has not directly received any further complaints or information associated with the premises. However, since the premises was transferred to Mr Mahendran after the second premises licensing review, a significant quantity of licensing breaches were identified during the licensing inspection. Visits to the premises have given risen to a number of concerns where Mrs Mariflo has been responsible despite persistent warnings from authorities that have seemingly been ignored.

Conclusion

The Licensing Authority has significant concerns relating to the premises and is of the opinion that granting a premises licence to Mrs Mariflo would likely be detrimental to the promotion of the licensing objectives. The premises has been subject to numerous complaints, two failed test purchase operations relating to the sale of age-restricted products and employment of an illegal worker. The applicant has previously been involved with the premises in the capacity as the premises licence holder, designated premises supervisor, and, person responsible for the training of staff members, where failings have been observed. There is insufficient evidence to suggest that the licensing objectives of the prevention of crime and disorder and protection of children would be adequately promoted if a decision is made to grant the premises licence. Despite the implementation of measures to address the premises previous failings and change in management, the premises continues to neglect its legal and social responsibilities, which is in direct contravention to the promotion of the licensing objectives.

Signed:



Date: 1st December 2025

Environmental Health Officer - Commercial & Licensing

Appendix 1 – Licensing Authority representation (April 2024)

**LICENSING ACT 2003
LICENSING AUTHORITY REPRESENTATION FORM**

To: **Environmental Health Manager**

From: **Alex Beebe**

Premises: **Luxa Sparkles, 103 Cherry Hinton Road, Cambridge**

Reference: **SR/390520**

Review of premises licence

Comment:

Introduction

On 14th February 2024 the responsible authorities (for the purposes of the Licensing Act 2003) were consulted on a review of the premises licence for Luxa Sparkles off-licence. The review proceedings have been instigated by the Home Office (Immigration Enforcement) under the 'prevention of crime and disorder' licensing objective, following illegal working being identified at the premises. Immigration Enforcement have requested the premises licence be revoked.

The purpose of this submission is to summarise the complaints and related investigations that the licensing authority has received regarding alleged underage sales of alcohol and other age-restricted products as well as the sale of alcohol to already intoxicated customers at the business.

May 2018

A member of staff of a local sixth form college contacted the Police alleging that a 17-year old student had on 25th April 2018 bought a bottle of vodka unchallenged from the premises. The student later had to be taken to hospital due to intoxication.

There was also a separate complaint received by the licensing authority from a local resident alleging the sale of alcohol to people who were already drunk: this led to congregations of drunk people outside the business at night-time.

An inspection of the premises was undertaken together with the police licensing officer. The manager was interviewed and till receipts checked, but there was no evidence of the transaction taking place. The manager was reminded of their legal duties with regard to the sale of age-restricted products. Condition 6 of the premises licence requires the business to operate a 'Challenge 21' policy.

January 2019

A complaint was received alleging that on 26th January 2019 a group of three 14–15-year-olds had been sold three bottles of Lambrini and a small bottle of vodka. The children were not asked for ID. The complainant was the mother of one of the children.

A joint visit was made with the police licensing officer on 30th January 2019. Although CCTV footage was inspected and till receipts checked (between the hours the children were said to have visited the business) no evidence could be found of the visit/transaction in question.

An advisory letter was (attached as **Annex 1**) issued to the DPS/licence holder 'Mrs Priyamwatha Mariflo'. The letter reminded Mrs Mariflo of her responsibilities regarding the

sale of age-restricted products as well as the need to ensure compliance against the conditions attached to the licence. Trading Standards were sent a copy of the letter for their information.

October 2020

The Police received a complaint from a mother of a 16-year old who advised her daughter and friend were able to purchase a bottle of vodka from the business on 16th October 2020. The licensing authority was duly advised of the complaint. Although the complainant was approached for further information there was no response. The police licensing officer advised that the Police had also received two separate allegations in August 2020 of nitrous oxide canisters being sold to children.

A joint visit with the police licensing officer was made on 10th November 2020 where Mrs Mariflo's husband was present with two other staff members. During the visit staff asked questions such as: whether proxy sales were allowed (parents buying alcohol on behalf of their children); whether they could accept copies of ID e.g. photographs of passports, driving licences etc. on a phone rather than originals; and, if they needed to ask for identification of young people on each occasion even if they had seen ID previously. This raised serious concerns about the level of training given to staff. Mrs Mariflo was named as the person responsible for staff training.

An advisory letter (attached as **Annex 2**) was sent by the police licensing officer to Mrs Mariflo dated 13th November 2020. It was stressed to Mrs Mariflo that the police and licensing authority took complaints of alleged underage sales seriously, and that should evidence be obtained a review of the premises licence be sought. Due to the concerns raised during the visit as well as the history of complaints, Mrs Mariflo was requested to submit a minor variation to add two conditions to the premises licence. These conditions sought to: enhance the training given to staff members; request 6-month refresher training; maintain records of training operate a 'Challenge 25' scheme; and, maintain a refusals log.

Mrs Mariflo responded to this letter with an e-mail dated 1st December 2020 (attached as **Annex 3**) and disputed the allegations of underage sales. She also indicated that she would submit a minor variation application, this has yet to occur.

It was concluded there was insufficient evidence at the time to pursue a review of the premises licence. There was also no way to compel the licence holder to submit a minor variation. A test purchasing visit was considered but deemed not to be practical due to the impacts of the pandemic.

June 2021

A complaint was received from a local resident alleging issues from noise and anti-social behaviour from congregations of inebriated individuals regularly of an evening seen

outside the front of the business. The complainant alleged they had seen staff members giving alcohol and associating with those gathering. The matter was referred to the police where the local neighbourhood policing team was asked to patrol.

January 2023

The Police received a report of the business allegedly selling alcohol to children at significant risk. The licensing authority and Trading Standards were advised of the complaint. Trading Standards advised that they had conducted a test purchasing operation at the business in August 2022, in which a child was able to purchase alcohol. The issuing of cautions to Mrs Mariflo, her husband and a staff member was being considered. Mrs Mariflo was advised that further test purchasing activity would be considered and should they fail again then Trading Standards would be looking to review the premises licence.

Summary

Whilst the licensing authority has no direct evidence of offences being committed under the Licensing Act 2003 e.g. sales of age-restricted products to children, sale of alcohol to intoxicated customers etc. there have been six similar complaints made against the business in the past 6 years. No other off-licence premises in the city has received a similar level of complaints.

Visits to the premises have given rise to a number of concerns, especially staff training for which the licence holder and designated premises supervisor, Mrs Mariflo is responsible. Despite persistent warnings to the business, complaints have continued. Recommendations provided by the licensing authority and the Police have also seemingly been ignored. This calls into question whether the licence holder is sufficiently promoting the licensing objectives, namely 'prevention of crime and disorder' and 'protection of children from harm'.

It has also been noted on page 9 of the Home Office Premises Licence Review pack, where it is stated that staff at the business have been offering alcohol to customers on credit. Whilst this is not illegal, it could be considered to be unethical to those who are vulnerable and unable to pay the debt off.

Signed:



Date: 8th March 2024

Environmental Health Officer - Commercial & Licensing

Enquiries to:

Contact name: Alex Beebe

Job Title: Senior Technical Officer - Commercial & Licensing

T: [REDACTED]

E: [REDACTED]

Mariflo Mariyanayagam
Luxa Sparkles
[REDACTED]

Tuesday 12th February 2019

Our Ref: AB/WK/201867482

Dear Mr Mariyanayagam,

Licensing Act 2003

Complaint of alleged underage sale of alcohol at Luxa Sparkles, 103 Cherry Hinton Road, Cambridge

I write following our visit to your premises on the afternoon of Wednesday 30th January 2019.

The reason for our visit was in response to a complaint received from a member of the public. The complainant had alleged that during the late afternoon of Saturday 26th January 2019, the complainant's daughter and two friends, who were all aged between 14-15 years old, were sold alcoholic beverages at your premises.

As you will be aware, the Licensing Act 2003 provides it is a criminal offence to sell alcohol to anyone under the age of 18. A person found guilty of this offence, upon summary conviction, may be subject to an unlimited fine. In addition, committing such an offence would raise questions about staff training and practices at the premises possibly culminating in a review of the Premises Licence. Options open to the Licensing Committee at such a review include the suspension and revocation of a Premises Licence.

During our visit we asked for you to show us the CCTV footage between 2:00pm and 7:00pm on Saturday 26th January 2019. The CCTV system you have in operation is motion-sensitive meaning footage is only recorded when movement is detected in front of the counter. We also asked you to produce a selection of till receipts between the times above.

In summary, on this occasion we could not find any evidence that the children in question had visited your business at the date and times alleged, and that the alcoholic beverages in question had been purchased.

It may be the case that there is no substance to this complaint, or the time/date of the visit are incorrect, but in any case, bearing in mind this is the second complaint the business has received alleging underage sales of alcohol within 12 months (the first being May 2018, which gave rise to the licensing inspection that was conducted), the Licensing Authority and the Police felt it prudent to write to you to remind you and your staff members of the requirements of the law.

I would therefore like to stress to you that the mandatory conditions attached to all Premises Licences require licence holders to implement an age verification policy to ensure alcohol is only sold to those aged 18 years or over. In the case of Luxa Sparkles Annex 2 Condition 6 provides that the premises operate a 'Challenge 21' scheme; this means that any customer buying alcohol who looks under 21 must be asked to provide a reliable proof of age document e.g. passport, DVLA driving licence, PASS card or Military ID. Please ensure you and all staff members are aware of this requirement and are suitably trained.

I would strongly recommend, however, you upgrade your age verification policy to Challenge 25 in line with many major retailers to further limit the chance that alcohol is sold to children. Challenge 25 resources can be found online at:
<https://www.wsta.co.uk/challenge-25>.

I hope you find the above information useful. If you would like any point clarified then please do not hesitate

Yours sincerely,

Mr Alex Beebe
Senior Technical Officer - Commercial & Licensing, Cambridge City Council

PC Clare Metcalfe
Licensing Officer, Cambridgeshire Constabulary

CC. Priyamwatha Mariflo, 16 Millfield, Willingham, Cambridge CB24 5HD

Trading Standards, Cambridgeshire County Council



Creating a safer
Cambridgeshire

13th November 2020



Parkside Police Station.
Parkside,
Cambridge,
Cambridgeshire,
CB1 1JG.



Dear Mrs. Mariflo,

I write following my visit to Luxa Sparkles on Wednesday 10th November 2020 together with my colleague Alex Beebe who represents the licensing authority, Cambridge City Council.

The reason for our visit was to discuss with your husband, allegations that age-restricted products had been sold to those underage.

The first matter regards two separate reports Cambridgeshire Constabulary have received from August alleging nitrous oxide canisters have been sold to children. Mariflo stated he has not stocked nitrous oxide for a couple of months, but it would appear the products were on sale when the reports were made. Nitrous oxide canisters may legally be sold to those aged 18 or over provided they are not to be used for the individual's own consumption e.g. substance abuse. In these instances, sale must be refused.

The second item we wished to discuss was regarding an allegation from a parent that their underage daughter had purchased a bottle of vodka at Luxa Sparkles on the evening of Friday 16th October 2020. Mariflo was able to print out a number of receipts corresponding to purchases made on the evening in question, but during our visit we were unable to substantiate whether the transaction took place. Please be advised this matter is still subject to police investigation and I may be back in touch to request further information/records. In the interim please supply me with the last 3 months' worth of records from your refusals log, which I understand is now maintained electronically.

At the conclusion of our visit Mr Beebe and I had several concerns about the operation of Luxa Sparkles that I wish to address with you as the designated premises supervisor and licence holder.

1. Wearing of face coverings – when we entered the premises staff were initially not wearing face coverings. It is a [legal requirement](#) during the COVID-19 pandemic that staff working in customer-facing areas wear a face covering unless they have an exemption. Mariflo and the other two gentleman present were advised of this.

2. **Complaints** – other than the two matters mentioned above I am aware the Council has received complaints of underage sales of alcohol at Luxa Sparkles previously in: April 2014, May 2018 and January 2019. This now makes 6 similar complaints since 2014; however, as we expressed to Mariflo, seldom do we receive complaints alleging underage sales at other supermarkets and shops in Cambridge.
3. **Challenge 21** – a reminder that it is a licence condition that staff need to be asking for ID (driving licence, passport, PASS card or military ID), in its original form, every time someone they believe is under 21 attempts to buy alcohol.
4. **Training/knowledge** – the staff members present, including Mariflo, appeared to be confused on a number of matters relating to alcohol sales. We were asked: whether proxy sales were allowed (parents buying alcohol on behalf of their children); whether they could accept copies of ID e.g. photographs of passports, driving licences etc. on a phone rather than originals; and, if they needed to ask for identification of young people on each occasion even if they had seen ID previously.

It is extremely troubling to us that members of staff, who are in control of selling alcohol, need to ask these questions as their role mandates they must know the law regarding alcohol sales. This raises the question of staff training; Mariflo advised that you give training to staff members. In light of the above, it would appear to us that the level of training provided is inadequate. I therefore require you to ensure that all staff are appropriately trained in their role of selling age-restricted products. Whilst this does not have to be a formal training course, you may wish to consider recognised qualifications such as the [Level 1 Award in Responsible Alcohol Retailing](#) or the [Level 2 Award for Personal Licence Holders](#). Please update me with the details of what training staff members will receive and how this will be completed.

5. **Designated Premises Supervisor (DPS)** – the DPS is the key person who will usually be charged with day to day management of the premises by the premises licence holder, including the prevention of disorder. Whilst the DPS does not need to be on site at all times, they are expected to be involved enough with the business to be able to act as its representative, and they must be contactable at all times. I understand that it is Mariflo, his brother and another staff member who run the shop. Bearing in mind the recommendations I have made above in point 4, I suggest that Mariflo, or another member of staff, may be better suited to being appointed as the DPS as they are seemingly more closely involved in the day-to-day running of the business. The DPS must hold a Personal Licence so any individual wishing to become DPS would first need to pass the Level 2 Award for Personal Licence Holders and then obtain a Personal Licence from their local licensing authority.

I would like to stress to you that the police and licensing authority take reports of alleged underage sales extremely seriously. If evidence is obtained proving alcohol, or another age-restricted product, is sold to someone under the relevant age then the police and/or licensing authority will likely pursue a review of the Premises Licence for Luxa Sparkles. Options available to the Licensing Sub-Committee at a review hearing include the revocation of the licence. Please also note that both the police and trading standards can authorise test purchasing operations where individuals under the age of 18 attempt to buy alcohol in licensed premises.

In light of our concerns and history of complaints I would like to seek your permission to add some additional conditions to the licence via a minor variation application as follows:

Annex 2

- *Staff will receive full training on responsible alcohol sales and this will be refreshed every 6 months, this training will take place prior to staff commencing customer facing duties. The training will include responsibilities in the sale of alcohol, in particular with regard to drunkenness and underage persons and to the use of Challenge 25 policy correctly and effectively, and display notices on the premises. Records will be kept of such training and will be immediately available for inspection by Cambridgeshire Police for inspection upon request.*
- *A written or electronic log will be kept of all refusals including refusals to sell alcohol. The Premises Licence holder shall ensure that refusals log is checked on a regular basis. The log will be kept and maintained at the premises and will be available at all times whilst the premises are open for inspection immediately upon request by Cambridgeshire Police and any responsible authority.*

The above conditions are common for off-licence premises. If you agree to their addition it could help demonstrate your commitment to the responsible sale of alcohol and the promotion of the licensing objectives. An [application for a minor variation](#) needs to be made to Cambridge City Council; this carries an application fee of £89.00.

In summary, the action points I need you to complete by Monday 30th November are as follows:

- Send me the last 3 months' worth of records from your refusals register;
- Remind staff of the need to wear face coverings in public and customer-facing areas;
- Provide adequate training for staff on age-restricted products and send me the details of how staff have been trained; and
- Consider my proposal to submit a minor variation to add conditions, which we feel are appropriate to the running of the licensed premises, to the licence.

I will send you a hardcopy of this letter to you in the post.

I shall look forward to hearing from you in due course.

Yours sincerely,



Police Constable 446 Clare Metcalfe
Licensing Officer
Cambridgeshire Constabulary.

CC - Alex Beebe



Annex 3

From: Priya Luxa [REDACTED]

Sent: Tuesday, December 1, 2020 4:28 PM

To: Licensing South [REDACTED]

Subject: Re: Luxa Sparkles

Dear Police Constable 446 Claire Metcalfe,

I am writing this email regarding your visit to my shop Luxa Sparkles on Wednesday 10th Nov 2020 together with your colleague Alex Beebe who represents the licensing authority to Cambridge City Councils.

On your visit, you discussed with my husband that age restricted products had been sold. I am very disappointed with the reports that you have received on nitrous oxide canister as I am aware that nitrous oxide can only sold to those aged +18 and I am sure that no sale to anyone under 18 has been made. I am certain that all my staff are well trained on the product as I have been up to date with my staff training and I always ensure they are trained to full requirement every six months. This training helps our staff effectively and confidently to refuse the purchase of restricted items by young people.

I am rather a concerned about a complaint from a parent where their underaged daughter had purchased a bottled of vodka at Luxa Sparkles on the evening of Friday 16th October 2020. I have dealt with a similar allegation with regards to this matter. When I had checked the CCTV camera, my husband and I found out that the girl tried to buy a bottle of vodka from us, one of our staff requested for an ID and he refused the sale of alcohol. Consequently the girl got frustrated and used foul language towards our staff. When the parent of that girl visited my shop I showed the video clearly showing that we refused the sale. She found out that her daughter bought it somewhere else, accused us and used our shop name out of frustration that we denied the sale. Her mum apologised and requested not to complain to the police. As a mother I had to respect her request because I am also a mother of two girls. Since that case my husband I were extremely cautious with regards to sale to young people. During my regular visits to the shop, I always ensure the staff follow the Think 21 model and Challenge 25 policy correctly and effectively. We had some test purchasing operations authorised by trading standards. We had proved that we never sold to under the age of 18.

I would like to apologise sincerely that my staff were not wearing face coverings during the COVID 19 pandemic. I have ensured that it has not happened since and will make sure this won't happen again. My husband Mariflo may have appeared to be confused on a few matters relating to alcohol sales. I am certain that he has got more than necessary knowledge to become a Designated Premises Supervisor(DPS)and knows that we shouldn't accept any photocopies of ID as any form for ID only accept originals. He has been trained on your guide to sell alcohol as well as other staff working in the shop. I hold this training every six months. Mariflo may had panicked and therefore his responses did not comply with the licensing objectives.

My husband and I have been running this business for the past 15 years and trying hard to our continued commitment to prevent the sale of alcohol to those under the age of 18. My husband is a one of the most hard working person who has committed his whole life for his family. He goes to cash and carry in London every week in the last 15 years he never slept one day without his knee pain. We have two daughter one 18 and 9 years and we work incredibly hard as a family to get this position.

Annex 3

We hope to run this business without any further complaints against us. I will follow all the licensing objectives, obey the law and co-operate with the Cambridgeshire Constabulary and Cambridgeshire Trading Standard Service.

For action point-

1. I have attached the last three months record of refusal register.
2. I have reminded my staff the importance of wearing face covering mask during this COVID 19 pandemic and will ensure masks are worn at all times
3. I have provided adequate training for the staff on age restricted products. I will ask my husband to do the level 2 Award for personal Licence Holders for extra certainty.
4. I will submit the application for a minor variation.

I look forward to your reply.

If you have any query regarding this matter please do not hesitate to contact me.

Thanking You

Kind Regards

Priyamwatha Mariflo

Appendix 2 – Licensing Authority representation (September 2024)**THE LICENSING ACT 2003
REPRESENTATION FORM FOR “RESPONSIBLE AUTHORITY”**Please delete as applicable: **LICENSING AUTHORITY**

Your name	Alex Beebe
Job Title	Environmental Health Officer (Commercial & Licensing)
Postal Address (inc post code)	Cambridge City Council PO BOX 700 Cambridge CB1 0JH
Contact telephone number:	
Mobile Number:	N/A
Email address:	

Name of Premises you are making a representation about:	Luxa Sparkles
Address of the premises you are making a representation about:	103 Cherry Hinton Road Cambridge CB1 7BS

This section is about your representation/s. They must relate to one or more of the Licensing Objectives. Please detail the evidence supporting your representation, (under the relevant headings) and the reason for your representation/s. *It is important that you detail all matters that you wish to be considered. (Use additional sheets if necessary). Regulations provide that in considering representations the authority may take into account documentary or other information produced by the party either before the hearing or, with the consent of all parties, at the hearing.*

Which licensing objective(s) does your representation relate to?	
The prevention of crime and disorder	Public safety
See below	N/A
The prevention of public nuisance	Protection of Children from Harm
N/A	See below

**LICENSING ACT 2003
LICENSING AUTHORITY REPRESENTATION FORM**

To: **Commercial & Licensing Team Manager**

From: **Alex Beebe**

Premises: **Luxa Sparkles, 103 Cherry Hinton Road, Cambridge**

Reference: **SR/398557**

Review of premises licence

Comment:

Introduction

On 2nd September 2024 the responsible authorities (for the purposes of the Licensing Act 2003) were consulted on a review of the premises licence for Luxa Sparkles off-licence. The review proceedings have been instigated by Trading Standards under the 'protection of children from harm' licensing objective, following a test purchase operation on 12th August 2024 where alcohol was sold to a child.

For reference, Miss Luxa Shiny Mariflo became designated premises supervisor (DPS) on 18th April 2024. The premises licence was also transferred on this date to Akshayam Ltd. Mr Mariyanayagam Mariflo is listed as the director of the company. Mrs Priyamwatha Mariflo was the DPS and licence holder before this date.

This is the second review of the premises licence this year, further to the one raised by Immigration Enforcement (Home Office) in February 2024, which was heard by the Licensing Sub-Committee on 22nd April 2024. At the hearing members resolved to 'leave the licence as it is' with a recommendation that the Licensing Authority support the business by undertaking a licensing inspection within 6 months. In making their decision members made the following comments:

- *"There were no objections to the new Premises Licence Holder and no evidence she would not correctly fulfil the role in accordance with the Licensing Objectives."*
- *"...The Sub Committee has considered Miss Mariflo's commitment to uphold the Licensing objectives and has decided to leave the licence as it is with the above support."*

The Licensing Authority's previous submission is attached as **Appendix 1** and contains the complaints and investigations history to April 2024.

Summary

Since the hearing in April 2024, the licensing authority has not directly received any further complaints regarding the business. In July 2024, however, Trading Standards approached the Licensing Authority to advise that further complaints had been made to Trading Standards concerning sales of age-restricted products at the business. Three complaints were made between April and July, with one lodged just three days after the last review hearing.

Trading Standards advised they would consider visiting the premises as part of a test purchasing operation. The Licensing Authority supported this and advised a licensing officer would attend, as it appeared to be a reasonable and proportionate intervention bearing in mind the history of the business. A decision was made to defer the licensing inspection until after the result of the test purchasing operation.

I joined Trading Standards officers along with the police licensing officer on the test purchasing operation on 12th August 2024. Prior to entering I had been advised a 16-year-old volunteer had been sold a can of gin by Mr Mariflo Mariyanayagam. As I entered the store, I noted a number of 'Challenge 25' posters attached to the front door, including a double-sided handwritten sign that advised customers: "Sparkles will not sell tobacco or alcohol without aged prove if you are under 25" (**Photo 1**).



Photo 1: signage on main entrance door

I noted as the Trading Standards officers were interviewing Mr Mariflo he commented that he thought the volunteer in question was 18. This is contrary to the signage present, which suggests staff will ask for ID where anyone who looks under 25. Mr Mariflo was by himself at the time of visiting. I asked Mr Mariflo how often his daughter, Miss Luxa Mariflo (the DPS), was present at the premises, and he replied that she was there that morning.

Condition 6 of the premises licence states:

"On occasions when the venue is open for the sale of alcohol the DPS or relevant person will actively operate a 'Challenge 21 policy'. This will include a voluntary agreement to only accept identity cards with a 'pass' accreditation, passports or photoID driving licences, or any future identification card as approved by central government, as bona-fide recognised forms of identification."

It may therefore be considered there has been a breach of the premises licence.

In the licence holder's submission from the review in April 2024 ('Appendix D – Information from licence holder'), several measures were put forward to address the failings identified, which include:

- Page 3: due a number of incidents that occurred under the leadership of the previous licence holder, Mrs Mariflo, "the responsibility of the premises licence has been completely overhauled", with Miss Luxa Mariflo taking over as the new premises licence manager and DPS. A new limited company was also formed, Akshayam Ltd with responsibility moved away from Mrs Mariflo.
- Page 4: "Specific training with respect to age restricted goods has been put in place, with additional attention being given specifically to vapes and legal requirements". Staff training was also introduced and documents in place which include: age verification checks, Challenge 25, till prompts etc.
- Page 18: outlines the age verification policy in place for the premises, which includes a statement providing: "This premises operates a Challenge 25 policy. This means if anyone in any capacity attempts to purchase alcohol under the premise licence, does not appear to be 25 years of age they will be challenged to prove they are 18 years of age. Any staff selling alcohol... MUST carry out the Challenge 25 test".
- Page 21: under 'Further staff guidance for premises licences with and without sale of alcohol': "Make sure all of your staff know what Challenge 25 policy is and they have the confidence to challenge customers and refuse them".

It would appear not only have these measures have failed to address the continuing issues identified, but also the transfer of responsibility and management to Miss Mariflo has made no difference to the situation at the business, with non-compliances continuing.

Conclusion

The premises has an extended history of complaints relating to the sale of age-restricted products to children. The business has now failed three test purchasing checks in a 2-year period; in the most recent case a 16-year-old was sold alcohol with no age verification check taking place. Despite the implementation of measures to address the failings present and a change in management, the business continues to neglect its legal and social responsibilities, which is in direct contravention to the promotion of the licensing objectives.

Signed:

A black rectangular box redacting the signature of the Environmental Health Officer.

Environmental Health Officer - Commercial & Licensing

Date: 13th September 2024

Appendix 3 – Warning letter (September 2025)

Enquiries to:

Contact Name: Jason Toyne

Job Title: Senior Technical Officer - Commercial & Licensing

T:

E:



Kirubakaran Mahendran
Premier Cambridge Convenience Store



Thursday 25th September 2025

Our Ref: Inspection/88709

Dear Mr Mahendran,

Licensing Act 2003

**Premier Cambridge Convenience Store, 103 Cherry Hinton Road, Cambridge -
Licensing Inspection**

I write following my visit to the above premises on the afternoon of Thursday 25th September 2025.

On Friday 19th September 2025 at approximately 10:30 PC Clare Metcalfe (Licensing Officer, Cambridgeshire Constabulary) and I visited your premises (103 Cherry Hinton Road).

This was an announced visit which was arranged and discussed with yourself on the afternoon of 11th September 2025. This was followed up with an email confirming the arranged inspection and the purpose. The purpose of the inspection was to assess compliance with the premises licensing conditions – particularly conditions in Annex 3 (conditions attached after a hearing by the licensing authority).

During my visit, several matters were found that require your immediate attention. A timescale to completion is given in each case. References to conditions in the Premises Licence/law are in italics.

PO Box 700, Cambridge, CB1 0JH,
www.cambridge.gov.uk Switchboard: 01223 457000

1. Prevention of Crime & Disorder

"At least two members of staff shall be on duty after 21:00" (Annex 2, Condition 1)

When arranging the licensing inspection, you advised me that you were currently away in Bournemouth. During the inspection you stated that you have another off-licence premises in Cardiff and that you have one full time employee. You must ensure that you have reasonable staff resources.

Timescale: 28 days

2. CCTV system requirements not met

"High definition CCTV shall be installed, operated and maintained, at all times that the premises are open for licensable activities or customers are on the premises and ;" (Annex 3, Condition 5).

"Shall be checked every two weeks to ensure that the system is working properly and that the date and time are correct. A record of these checks, showing the date and name of the person checking, shall be kept and made available to the Police or authorised council officers on request" (Annex 3, Condition 5a).

"At least one camera will show close-up of the entrance/entrances to the premises, to capture a clear, full length image of anyone entering" (Annex 3, Condition 5b).

"Shall cover any internal or external area of the premises where licensable activities take place" (Annex 3, Condition 5c).

"Recordings shall be in real time and stored for a minimum period of 56 days with date and time stamping" (Annex 3, Condition 5d).

"Footage shall be provided to the Police or authorised council officer within 24 hours of a request" (Annex 3, Condition 5e).

"A staff member from the premises that is conversant with the operation of the CCTV system shall be on the premises at all times. This staff member will be able to show Police or authorised officers of the Licensing Authority recent data footage with the minimum of delay when requested. This data or footage reproduction shall be almost instantaneous" (Annex 3, Condition 5f).

"Appropriate signage shall be displayed in prominent positions, informing customers that they are being recorded on the CCTV" (Annex 3, Condition 6).

During the visit you could not demonstrate that the CCTV is working properly and that the date and time is correct. You could not access the CCTV footage via your mobile device, as you were locked out of the app. There were no records provided

to demonstrate that the system is checked every two weeks, to ensure its working properly. There did not appear to be a camera covering the entrance/entrances to the premises. The CCTV data storage limitations of the system could not be checked due to no access. You did not demonstrate that you were conversant with the operation of the CCTV system. No prominent signage identified informing customers that they are being recorded on CCTV. An external sign was identified adjacent to the front shutter. This was displayed for the front external CCTV camera, which was not working. The camera at the rear of the shop will likely be obstructed due to the close proximity of the premises stock.

During the inspection you mentioned that you were in the process of installing new CCTV. Please ensure that the new CCTV system ensures that you are compliant with conditions above associated with CCTV at the premises.

Timescale: 28 days

3. Not sufficient evidence of staff training

"All staff responsible for selling alcohol shall receive relevant training before making any unsupervised sales. The training shall include the Licensing Act 2003 in terms of the licensing objectives and offences committed under the Act, the conditions of the Premises Licence, the sale of age restricted products.

This training will be refreshed at least every 6 months. Staff shall sign to confirm that they have received and understood the training. Written records of this training shall be retained and made available to the Police or authorised officers of the Licensing Authority upon request.

Age restricted products training shall cover the following steps: the assessment of age; how and when to challenge for proof of age; acceptable proof of age and how to check; and recording refusals

All staff shall be trained in how to identify drunk or drug impaired customers. This training shall be repeated at least biannually. Staff shall sign to confirm that they have received and understood the training. Written records of this training shall be retained and made available to the Police or authorised officers of the Licensing Authority upon request" (Annex 3, Condition 7).

You did provide a record of Licensing Act 2003 training was delivered on 16th August 2025 and signed by staff member 'Elistan'. Other dates were listed and not signed under alcohol ABV levels, tobacco and E liquids/vapes. However, no records or evidence of the training content were provided.

Timescale: 14 days

4. No incident log available

"A daily incident log (electric or paper based) shall be kept at the premises and made available on request to an authorised officer of the council or the Police or the Fire Service which shall be record following" (Annex 3, Condition 8).

"All crimes reported to the venue" (Annex 3, Condition 8a).

"All ejection of patrons" (Annex 3, Condition 8b).

"Any complaints received" (Annex 3, Condition 8c).

"Any incidents of disorder" (Annex 3, Condition 8d).

"Any faults in the CCTV system" (Annex 3, Condition 8e).

"Any visit by a relevant authority or emergency service" (Annex 3, Condition 8f).

"The incident record shall be kept on the premises and be available for inspection by the Police or authorised officers of the Licensing Authority at all times the premises is open"

"A record of complaints shall be maintained on the premises to record details of any complaints received. The information to be recorded shall include the date and time of the complaint and subsequent remedial action undertaken and (where disclosed) the complainants name and location"

"The record of complaints shall be kept for 12 months from the date of the last record made and shall be available for inspection on demand by the Police or authorised officers of the Licensing Authority at all times the premises are open"

No records were provided that an incident log is available at the premises. You did confirm that you received a complaint from a parent of a Special Educational Needs person. However, no written evidence or record of subsequent remedial action was provided or recorded.

Timescale: 14 days

5. Refusal log

"The licence holder shall require staff to note any refusals in a refusals log. The refusals log shall record the date and time of the refusal; the name of the staff member refusing; and the reason for the refusal. It must be checked and signed monthly by the designated premises supervisor. The refusals log shall be made available for inspection upon request by the Licensing Team, Police or Trading Standards"

Evidence was provided that there have been 10 refusals ranging from 30.03.2025 – 17.09.2025. However, no records of the name of staff member refusing the sale.

Timescale: 14 days

6. Alcohol to be in direct line sight from counter

"All alcohol shall be stored and displayed in direct line sight from the counter/till area" (Annex 3, Condition 12).

The rear shelves displaying wine were not visible from the till location. The alcohol stock must be relocated so it is in direct line sight from the till location.

Timescale: 7 days

7. Till prompts

"Till prompts will be used for any age restricted products" (Annex 3, Condition 14)

Spirits were tested which were prompted by the till. However, a random selection of vape products were tested. This resulted in 6 vape products not flagging on the till it was an age restricted product.

Timescale: 7 days

8. No audible alarm

"Audible alarm shall be fitted so that a member of staff is alerted when the entrance door is opened" (Annex 3, Condition 15).

During the visit the entrance door was opened and closed multiple times, no audible alarm was activated to alert the member of staff that the entrance door had been opened.

Timescale: 7 days

9. No independent test purchasing

"The licence holder will arrange for an independent audit company to undertake test purchasing of age-restricted products at least every 3 months and provide the results to Trading Standards by email" (Annex 3, Condition 16).

During the inspection you did provide evidence of a letter from Trading Standards regarding a passed test purchase (28.07.2025). However, this condition relates to

arranging your own test purchase with an independent audit company. Evidence of such agreement/contract must be in place.

Timescale: 14 days

Other matters

- As discussed during the inspection you mentioned that you have moved the till/counter a couple of months ago. According to records held at the Commercial and Licensing team no minor variation has been submitted to alter the layout of the premises. Please submit an application retrospectively.
- It was also noted during the inspection there was three liquid spillages identified. Two were near the display fridges and one adjacent to a defrosting freezer. This is a slip hazard for customers and members of staff. Please follow this link for guidance: [Slips and trips - HSE](#)
- It was identified that both challenge 25 and challenge 21 signs were on display at the premises. You confirmed that the premises has a challenge 25 policy in place, so consistent signage displayed will ensure customers are aware of the challenge policy.

As I advised you, the conditions attached to a Premises Licence are binding and need to be complied with at all times licensable activity is undertaken. The licensing authority may take the view that where licensable activity is provided, such as the sale of alcohol, in breach of one or more licence conditions, that this constitutes 'unauthorised licensable activity', which is a criminal offence. The above points should have been resolved prior to you taking over the premises as both the premises licence holder and the designated premises supervisor.

I intend to undertake an unannounced visit after the timescales provided. Please ensure that yourself and staff member is conversant of the licensing conditions on your premises licence. This is to ensure that another licensing inspection can be conducted to check the above numbered points have been dealt with. Further non-compliance with licensing conditions may result in enforcement action being taken.

A copy of this letter shall be sent to PC Metcalfe for her attention.

I hope you find the above information useful; if you would like any point clarified or mentoring, then please do not hesitate to contact me at this office.

Yours sincerely,

Jason Toyne
Senior Technical Officer (Commercial & Licensing)

CC. PC Clare Metcalfe, Licensing Officer (South Cambridgeshire), Cambridgeshire Constabulary, Parkside Police Station, Parkside, Cambridge

