



Alcohol and Entertainment Licensing Sub-Committee

Thursday 6 February 2025 at 2.00 pm

This will be held as an online virtual Meeting

Membership:

Members

Councillors:

Ahmed (Chair)
Hylton
Long

Substitute Members:

Councillors:

Bajwa, Chohan, Ethapemi, Hack, Lorber,
Mahmood, Rajan-Seelan

For further information contact: Devbai Bhanji, Governance Assistant
Tel: 020 8937 6841; Email: devbai.bhanji@brent.gov.uk

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[Council meetings and decision making | Brent Council](#)

The press and public are welcome to attend this meeting as an online virtual meeting by following the proceedings via the webcast available [HERE](#)

Notes for Members - Declarations of Interest:

If a Member is aware they have a Disclosable Pecuniary Interest* in an item of business, they must declare its existence and nature at the start of the meeting or when it becomes apparent and must leave the room without participating in discussion of the item.

If a Member is aware they have a Personal Interest** in an item of business, they must declare its existence and nature at the start of the meeting or when it becomes apparent.

If the Personal Interest is also significant enough to affect your judgement of a public interest and either it affects a financial position or relates to a regulatory matter then after disclosing the interest to the meeting the Member must leave the room without participating in discussion of the item, except that they may first make representations, answer questions or give evidence relating to the matter, provided that the public are allowed to attend the meeting for those purposes.

***Disclosable Pecuniary Interests:**

- (a) **Employment, etc.** - Any employment, office, trade, profession or vocation carried on for profit gain.
- (b) **Sponsorship** - Any payment or other financial benefit in respect of expenses in carrying out duties as a member, or of election; including from a trade union.
- (c) **Contracts** - Any current contract for goods, services or works, between the Councillors or their partner (or a body in which one has a beneficial interest) and the council.
- (d) **Land** - Any beneficial interest in land which is within the council's area.
- (e) **Licences**- Any licence to occupy land in the council's area for a month or longer.
- (f) **Corporate tenancies** - Any tenancy between the council and a body in which the Councillor or their partner have a beneficial interest.
- (g) **Securities** - Any beneficial interest in securities of a body which has a place of business or land in the council's area, if the total nominal value of the securities exceeds £25,000 or one hundredth of the total issued share capital of that body or of any one class of its issued share capital.

****Personal Interests:**

The business relates to or affects:

- (a) Anybody of which you are a member or in a position of general control or management, and:
 - To which you are appointed by the council;
 - which exercises functions of a public nature;
 - which is directed is to charitable purposes;
 - whose principal purposes include the influence of public opinion or policy (including a political party or trade union).
- (b) The interests a of a person from whom you have received gifts or hospitality of at least £50 as a member in the municipal year;

or

A decision in relation to that business might reasonably be regarded as affecting the well-being or financial position of:

- You yourself;
- a member of your family or your friend or any person with whom you have a close association or any person or body who is the subject of a registrable personal interest.

Agenda

Introductions, if appropriate.

Item	Page
1 Apologies for absence and clarification of alternate members	
2 Declarations of Interests	
Members are invited to declare at this stage of the meeting, the nature and existence of any relevant disclosable pecuniary or personal interests in the items on this agenda and to specify the item(s) to which they relate.	
3 Application for a New Premises Licence by Mr Kettan Patel for the premises known as Sai Krupa Supermarket, Unit 4-5 Chequers House, 149 Ealing Road, Wembley, Middx, HA0 4BY, pursuant to the provisions of the Licensing Act 2003	1 - 30

Date of the next meeting: Friday 7 February 2025



Please remember to **SWITCH OFF** your mobile phone during the meeting.

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LICENSING ACT 2003

Application for New Premises Licence

1. The Application

Name of Applicant:	Mr Kettan Patel
Name & Address of Premises:	Sai Krupa Supermarket, Unit 4-5 Chequers House, 149 Ealing Road, Wembley, Middx, HA0 4BY
Applicants Agent:	

The application is for a new premises licence as follows:

The supply of alcohol and to remain open from 6.00am to 11.00pm Monday to Sunday.

2. Background

The review of the Statement of Licensing Policy has introduced Cumulative Impact Zones for all new or variation applications for 'Off' licences in the borough.

This application falls within a Cumulative Impact Zone.

The presumption is that any new licence or variation to an existing licence that increases the scope for the sale of alcohol will not be granted unless the applicant can evidence that the licence will not negatively impact on the licensing objectives.

3. Promotion of the Licensing Objectives

See supporting document.

4. Relevant Representations

Representations have been received from The Licensing Police and Licensing Officer.

5. Interested Parties

None

6. Policy Considerations

Policy 1 – Process for Applications

Conditions on the licence, additional to those voluntarily sought/agreed by the applicant, may be considered. Conditions will focus on matters which are within the control of individual licensee and which relate to the premises or areas being used for licensable activities, the potential impact of the resulting activities in the vicinity. If situations arise where the licensing objectives may be undermined but cannot be dealt with by the use of appropriate conditions the Licensing Authority will consider whether it is appropriate for a licence to be granted or continue to operate.

7. Determination of the Application

Members can take the following steps when determining a new premises licence application:

- grant the licence;
- exclude from the scope of the licence any of the licensable activities to which the application relates;
- refuse to specify a person in the licence as the premises supervisor;
- reject the application

8. Associated Papers

- A. Application Form & plan
- B. Police Representation
- C. Licensing Representation
- D. OS Map



Regulatory Services
Brent Civic Centre
Engineers Way
Wembley
HA9 0FJ

TEL: 020 8937 5359
EMAIL: business.licence@brent.gov.uk
WEB: www.brent.gov.uk

Online Ref. No: 18644
Application No: 33752
Date: 17 December 2024

LICENSING ACT 2003

Licence: Premises Licence New Application

Application No: 33752

Dear Sir/Madam,

Applicant: Mr Kettan Patel

Date Received: 17 December 2024

An application was made to Brent Council under the Licensing Act 2003 by the above-named applicant. If you would like to make a representation please email business.licence@brent.gov.uk. Representations must specify in detail the grounds of opposition and must relate to the promotion of the licensing objectives.

In order that consideration of the application may not be delayed, it will be appreciated if a reply can be sent to us by

14 January 2025.

Yours faithfully

Vanessa Haulkhory
Licensing Support Officer
Regulatory Services

Part 1 – Premises Details

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

Sai Krupa Supermarket
Unit 4 - 5, Chequers House, 149, Ealing Road, Wembley, Brent, HA0 4BY

Telephone Number at premises (if any): 07838160860

Non domestic rateable value:

Part 2 – Applicant Details

Proposed Licence Holder:

Mr Kettan Patel

[Redacted]
[Redacted]
[Redacted]

Agent Details

Part 3 – Operating Schedule

When do you want the premises licence to start? 19-12-2024

If you wish the licence to be valid only for a limited period, when do you want it to end?

If 5,000 or more people are expected to attend the premises at any one time, please state the number expected to attend:

Please give a general description of the premises: Located on main road , with approximate area 1200 Sq. feet. Area is mixed with commercial and residential. The property comprises of a ground floor retail premise with basement . Alcohol will be sold for take away.

What licensable activities do you intend to carry on from the premises?

Section J: Sale of alcohol: Off the premises

The times the licence authorises the carrying out of licensable activities

Section J: Sale or Supply of Alcohol: Off the premises		
Day	Start Time	End Time
Monday	06:00	23:00
Tuesday	06:00	23:00
Wednesday	06:00	23:00
Thursday	06:00	23:00
Friday	06:00	23:00
Saturday	06:00	23:00
Sunday	06:00	23:00

State the name and details of the individual whom you wish to specify on the licence as designated premises supervisor:

Kettan Patel

Date of birth:



Licence Number:

Issuing authority:

Concerns in respect of Children: no

The opening hours of the premises

Day	Start Time	End Time
Monday	06:00	23:00
Tuesday	06:00	23:00
Wednesday	06:00	23:00
Thursday	06:00	23:00
Friday	06:00	23:00
Saturday	06:00	23:00
Sunday	06:00	23:00

a) General – all four licensing objectives (b, c, d, e):We will provide training to staff regarding selling of alcohol and allocate their duties.

b) The prevention of crime and disorder:We have CCTV in operation (15nos of camera) and have provision of recorded image for month and recorded image can be copied in USB. CCTV signange displayed so cuatomer can see .

c) Public safety: Fire extingushers serviced and maintained by certified company.

d) The prevention of public nuisance: Notice will be display to remind customers to leave quietly and respect neighbours.

e) The protection of children from harm:Ask for photo ID for person who appears to be under age.

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Sai Krupa Supermarket

Unit 4 & 5 , 149 Ealing road

Wembey

HA0 4BY

Steps we will take to promote Four licensing objectives together

- All staff will be provided with training in relation to the licensing objectives they are commensurate with their duties. This will include the individual's responsibilities, age verification and licensing offences, as appropriate. Details of the training will be recorded in a personal file or logbook and will be refreshed at regular intervals.
- Selling and the supply of alcohol will only be permitted between the following hours 06:00 to 23:00 hrs
- A personal license holder shall be present on the premises and supervise the sale of alcohol throughout the permitted hours for the sale of alcohol.
- Facilities for depositing litter and the collection of litter generated by customers purchasing food and drink must be available and maintained.
- Community safety partnership.

B) The prevention of crime and disorder

- The premises shall install, operate and maintain a comprehensive digital colour CCTV system to the satisfaction of the police. All public areas of the licensed premises including entry and exit points will be covered. The system must record clear images permitting the identification of individuals, and in particular enable facial recognition images (a clear head and shoulder image) if every person entering and leaving in any light conditions. The CCTV system will continually record whilst the premises are open for licensable activities and during all times when customers remain on the premises. All equipment must have constant and accurate time and date generation. All recordings will be stored for a minimum period of 31 days with date and time stamping. Recordings will be made available immediately upon the request of an authorized officer of a responsible authority throughout the entire 31 day period. The CCTV system will be capable of downloading images to a recognisable viewable format. The CCTV system will capture a minimum of 4 frames per second. The CCTV system will be fitted with security function to prevent recordings being tampered ,i.e. be password protected.
- A suitable intruder alarm and panic button shall be fitted and maintained.

C) Public safety

- All reasonable precautions will be made to keep the public safe on the premises. Fire risk assessments has been carried out by competent authorities, staff will be trained in fire safety procedures and food safety management documentation will kept.
- No person shall be allowed to open any alcoholic beverages, or any glass bottled beverages on or in front of the premises.

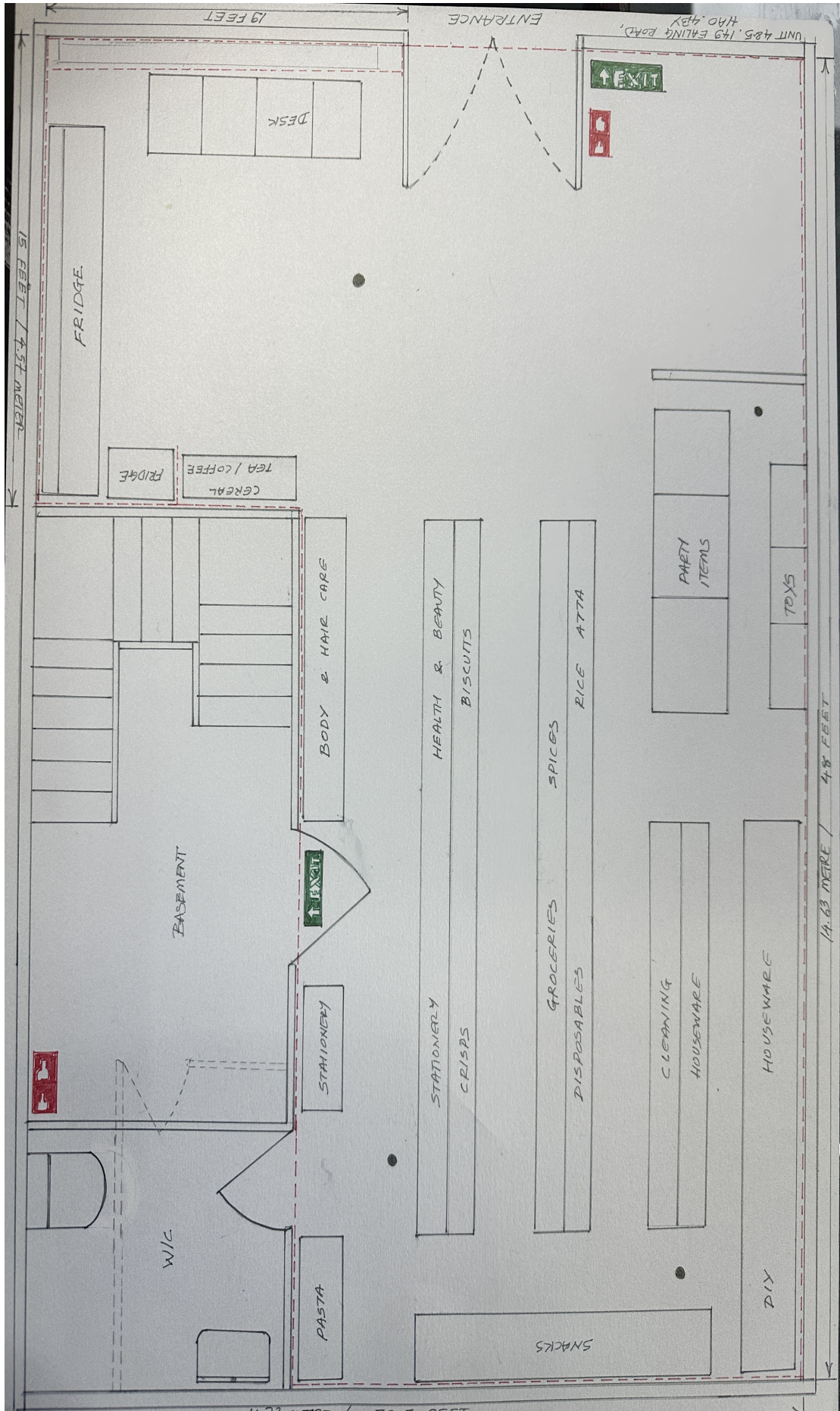
- All alcohol stored/sold at the premises must be sourced from a wholesaler registered with HMRC and has an AWRS unique reference number.
- A single incident log shall be kept at the premises and made available for inspection on request to an authorised officer of Brent council or the police, which will record the following
 - a) All crimes reported to the venue
 - b) All ejections of patrons
 - c) Any complaints received
 - d) Any incidents of disorder
 - e) All seizures of drugs or offensive weapons
 - f) Any faults in the CCTV system
 - g) Any refusal of the sale of alcohol
 - h) Any visit by a relevant authority or emergency service,

D) The prevention of public nuisance

- Persons identified as drinking alcohol in the immediate area around the premises (whether or not they have purchased alcohol from the premises) will be requested to leave and if they refuse to do so, a report will be made to the police.
- Any person who refuses to leave the area, or is identified as causing antisocial behaviour, will be subject to a ban from the premises.
- A notice asking customers to leave quietly from the premises shall be displayed by the exit/entrance.
- All deliveries shall take place during the normal working day (i.e. 09:00 to 18:00 daily)
- A record of banned individuals shall be maintained in the premises and all staff made aware of the persons who are currently banned so that entry may be refused. The record shall be kept available for inspection while the premises are open for trading.

E) The protection of children from harm

- A challenge 25 scheme will be adopted in compliance with the age verification conditions. customers who appear under 25 years of age will be required to prove their age when purchasing alcohol. Suitable forms of identification, will be a passport, pass card or other identification recognised by the licensing authority in its statement of licensing policy.
- All refusals documented



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**METROPOLITAN
POLICE**

Working together for a safer London

TERRITORIAL POLICING

**Sai Krupa Supermarket
Mr Keetan Patel
Unit 4-5 149 Ealing Road
Brent
HAO 4BY**

NW BCU Licensing Department - Brent

Wembley Police Station
603, Harrow Road
Wembley
HAO 2HH

Tel: 07500 087 115

Email: Phil.S.Graves@met.police.uk

Web: www.met.police.uk

Your Ref: 33752

Our ref: 01QK/849/24/3122NW

Date: Saturday 11th of January 2025

Police representations to the application for a new Premises Licence for 'Sai Krupa Supermarket, Units 4-5, 149 Ealing Road, Brent'

Police certify that we have considered the application shown above and wish to make representations that the likely effect of the grant of the application is detrimental to the Council's Licensing Objectives for the reasons indicated below.

**Officer: PC Phil Graves
Licensing Constable 3122NW**

An officer of the Metropolitan Police, in whose area the premises are situated, who is authorised for the purposes of exercising its statutory function as a 'Responsible Authority' under the Licensing Act 2003.

The application has been made for a new premises licence under section 17 of the Licensing act 2003. The Police representations are concerned with all four of the licensing objectives, namely:

- The prevention of crime and disorder;
 - Public safety;
- The prevention of public nuisance; and
- The protection of children from harm.

The Application

The application is for a new section 17 Premises License for an off license wishing for the sale of alcohol from 06.00 to 23.00 hours Monday through to Sunday.

The venue is located along the Ealing Road near the junction with Stanley Avenue. This is probably the busiest part of the Ealing Road with a large amount of pedestrians, cars and unfortunately regular complaints to the police and councillors of street drinking, ASB and littering.

The venue also falls into the Ealing Road Cumulative Impact Zone (CIZ). CIZ's were created by Brent Council to combat the crime, ASB and street drinking in the worst parts of the Borough. As mentioned in the last paragraph Brent Licensing Police along with Brent councils licensing team are receiving regular complaints about this exact problem based around street drinking, ASB and littering on this

stretch of the Ealing Road. Adding another off license to this extremely busy stretch of the Ealing Road will only add to the complaints, crime, street drinking and ASB.

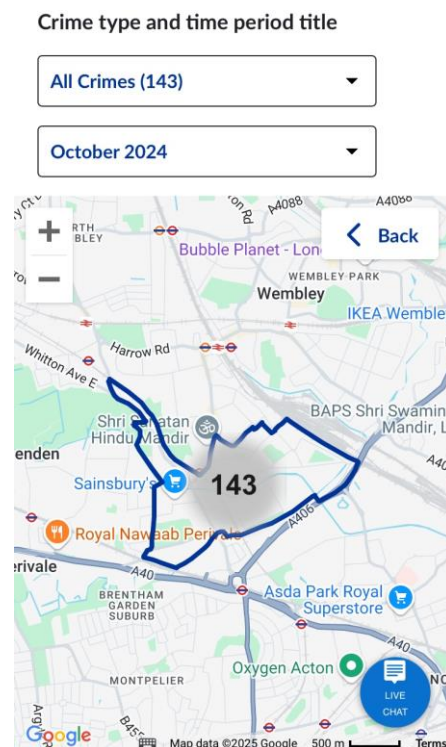
The application provides a list of proposed conditions, but makes no mention to the CIZ. Neither does the application go into any detail of any speciality theme, implying this is a standard off license selling traditional beers, wines and spirits that are readily available along the Ealing Road and surrounding areas.

<https://www.brent.gov.uk/business/licences-and-permits/alcohol-club-and-entertainment-licences/premises-licence#ciz>

As you can see from the link there is an assumption that any new off license application will be refused unless the applicant can demonstrate that their venue would not have a negative effect on the licensing objectives.

“Where an application for a new off-licence or for variations to off-licences is received (which would increase the sale of alcohol, including through longer hours), the presumption is that the application will be refused unless the applicant can satisfactorily evidence that their application or variation will not negatively impact on the licensing objectives.”

Below is a screen shot from the Met Police web site showing the crime figures for the HA0 4BY post code.



Out of these 143 crimes twenty-eight (28) are for ASB (Anti-social behaviour), three (3) for public order and forty-seven (47) for violence and sexual offences. These type of crimes are very often fuelled by intoxication via alcohol. Public order (swearing, threats), violence and sexual offences are a common crimes which already has a negative effect on community working and living along the Ealing Road.

Internal police intelligence systems for just one month (11/12/2024 to 11/01/2025) for 'Ealing Road' has a total of two-hundred and forty (240) returns. A breakdown of some of these figures are shown below.

Arrests	15
Stop and searches	5
Calls to police	124
Crimes recorded	92
Intelligence reports	4

The area already has regular complaints of street drinking and ASB. These complaints are been dealt with on an on-going basis by both the police and Brent Council. The complaints are based around littering and groups of men 'street drinking'. Adding another off license to the same area will just add to more complaints and crime.

Summary

The venue is not a specialist in any field and is trying to sell standard beers and wines that are already available across the Borough.

The crime figures and map quoted above speak for themselves. High levels of ASB, public order offenses, violent and sexual crimes all quite often instigated by excessive and continual alcohol use.

Allowing this application to progress, no matter how strict a list of conditions imposed, would only add to more alcohol on the streets, more street drinking, more ASB and crime in the area.

Taking all the above information into account police oppose this application in full on the basis that all four of the licensing objectives will not be met.

Yours Sincerely,

PC Phil Graves 3122NW
NW BCU - Brent Licensing
Philip.Graves@met.police.uk

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Business Licence
Regulatory Services
Brent Council
Engineers Way
Wembley
HA9 0FJ

10 January 2025

Ref: 33752

Dear Business Licence,

Licensing representation against the premises licence application in respect of Sai Krupa Supermarket, Unit 4-5, 149 Ealing Road, HA0 4BY.

The above-mentioned application has been made pursuant to section 17 of the Licensing Act 2003.

I confirm that I am the delegated officer of the Licensing Authority, in whose area the above-mentioned premises is situated, and who is authorised for the purposes of exercising its statutory function as a 'Responsible Authority' under the Licensing Act 2003.

I have carefully considered the above premises licence application, and consequently, I wish to make a representation on the grounds that if the application were to be granted, it would likely have a detrimental effect on one of the four below licensing objectives:

- **the prevention of crime and disorder;**
- public safety;
- the prevention of public nuisance;
- the protection of children from harm.

Operating Schedule

The premises licence application seeks to permit the licensable activity of the supply of alcohol for consumption off the premises between Monday and Sunday, 06:00 – 23:00.

It is acknowledged that the applicant has proposed numerous conditions consistent with the promotion of the four licensing objectives. These include:

- Recorded staff training
- A personal licence holder always being present at the premises
- Robust CCTV measures

- An incident log
- Measures to prevent street drinking directly outside the premises
- A barred customer list
- A Challenge 25 Age Verification Policy
- A refusal log

However, some conditions offered are unnecessary or duplicate existing legislation. These are outlined below:

- **Community safety partnership** – Despite being listed as a step to promote the four licensing objectives, there is no further detail on what this entails, leaving it unclear how this will contribute meaningfully.
- **All alcohol stored/sold at the premises must be sourced from a wholesaler registered with HMRC and has an AWRS unique reference number** – This is already a legal requirement; it is an offence to buy alcoholic products for resale from unregistered UK wholesalers.
- **Seizures of drugs or offensive weapons on the incident log** – There is no justification as to why an off-licence would implement a policy to search for drugs or offensive weapons. This appears to be an unrealistic and unnecessary condition that undermines the practical considerations required for a meaningful operating schedule.

These points raise concerns about the overall veracity and purpose of the proposed conditions. Instead of demonstrating a thorough and considered approach to promoting the four licensing objectives, these conditions could be considered as superficial compliance measures that have not taken the wider impact of the application into account. In addition, there are not meaningful preventive measures to address street drinking and anti-social behaviour within the local area.

Furthermore, it is noted that there is no explicit reference to the Cumulative Impact Zone (CIZ) within the application form or supporting documentation. It is expected that an applicant would acknowledge the CIZ in their application and propose appropriate conditions that would mitigate against any potential cumulative impact on the local area.

Cumulative Impact Zone (CIZ)

In 2022, Brent Council reviewed its Cumulative Impact Policy after assessing crime data from various sources. This led to the implantation of the Cumulative Impact Zones in specified areas within Brent, as outlined in the latest Statement of Licensing Policy (2025 – 2030).

Evidence shows a strong correlation between concentrations of off-licences and incidents of alcohol-led anti-social behaviour. Cumulative impact describes the stress caused by a high density of licenced premises on crime, disorder, nuisance, and local services.

The purpose of these CIZs is to address levels of crime, disorder, and anti-social behaviour, particularly related to street drinking. Consequently, the CIZs will specifically pertain to new applications and variations for off-licences, thereby creating a “rebuttable presumption” to any new application with a recommendation of refusal, unless the applicant can successfully demonstrate within their operating schedule that this wouldn’t be the case.

Further clarification on the Council’s CIZ policy can be found within ‘Appendix 6: Cumulative Impact Zones’ (page 50 – 65) within the Council’s Statement of Licensing Policy.

Ealing Road, Wembley

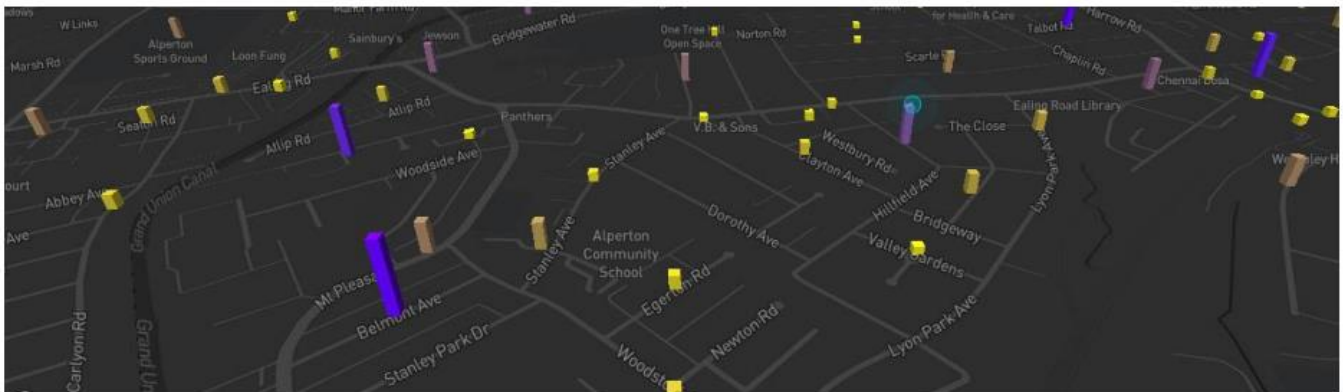
The CIZ that relates to the local area encompasses the entirety of Ealing Road, from the junction with High Road, Wembley to the junction with Bridgewater Road

Brent Council's Statement of Licensing Policy describes this area as having medium to high levels of deprivation and being a hotspot for alcohol-related calls to police. It is also a high reporting area for street drinking and anti-social behaviour.

Between 1 July 2021 and 30 June 2022, there were:

- 183 reports to the Police
- 72 relates to anti-social behaviour
- 11 related to public order offences
- 9 related to robbery
- 91 categorised as violent/sexual offences.

The below image, available on pages 58-59 of Brent Council's Statement of Licensing Policy provides an overview of crime locations within this area.



Public Space Protection Order (PSPO)

The entire Borough of Brent is subject to a Public Space Protection Order for street drinking, and it is an offence if a person fails to comply with a request to cease drinking alcohol by an authorised officer.

If a police officer reasonably believes that a person is, or has been, consuming intoxicating liquor within these areas, the officer may require the person concerned:

- a) not to consume in that place anything which is, or which the officer reasonably believes to be, intoxicating liquor
- b) to surrender anything in his/her possession which is, or which the officer reasonably believes to be, intoxicating liquor or a container for such liquor (other than a sealed container)
- c) An officer may dispose of anything surrendered to him/her as above.
- d) Issue fixed penalty notices on offenders
- e) Prosecute persistent offenders

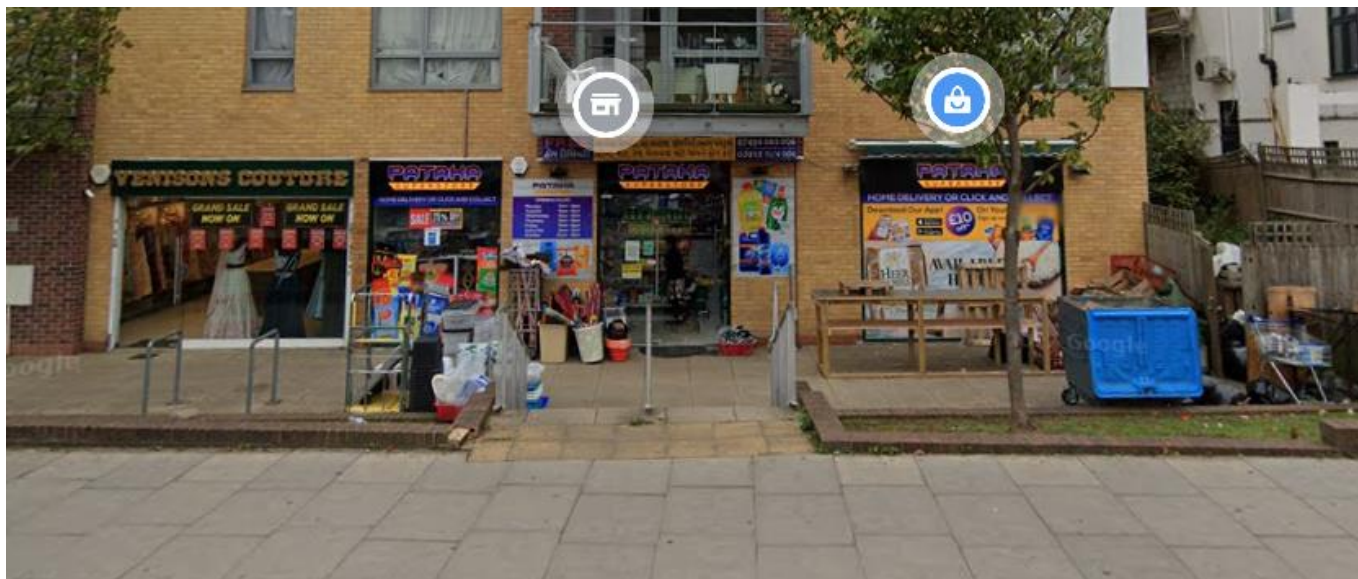
However, there are limited police officer resources, which in practice would prevent the above from being enforced. This therefore places a greater emphasis on the responsibility of those

premises that are selling alcohol for consumption off the premises. If off licences did not exist, the number of street drinkers would decline.

Location

The premises is located at Unit 4-5, 149 Ealing Road, HA0 4BY, within a ground-floor commercial unit beneath a residential block of flats. Additional houses are situated to the south along Ealing Road. Opposite the premises is a parade of shops, including an off-licence and food-led establishments.

In addition to this, Shri Sanatan Hindu Mandir Temple is located within 90 metres from the premises. Both sites of Alperton Community School are within 300 metres from the premises. The entrance to One Tree Hill Recreation Ground is about 350 metres away from the premises.



There are 8 similar off-licences operating in the vicinity of the business:

DIU Portugal, 234 Ealing Road, Wembley, HA0 40L (Premises licence number: 10504)
Permitted Hours: 09:00 – 23:00 (Monday to Sunday)
Distance: 24 Metres

Sidney's Off Licence, 216 Ealing Road, Wembley, HA0 4QG (Premises licence number: 156261)
Permitted Hours: 08:00 – 22:30 (Monday to Saturday), 10:00 – 22:30 (Sunday)
Distance: 73 Metres

The Hive, 4 Mount Pleasant, Wembley, HA0 4LP (Premises licence number: 165853)
Permitted Hours: 06:30 – 23:30 (Monday to Sunday)
Distance: 260 metres

One Stop Superstore, 284 Ealing Road, Wembley, HA0 4LL (Premises licence number: 30409)
Permitted Hours: 09:00 – 22:00 (Monday to Sunday)
Distance: 270 meters

Alperton Point, 290 Ealing Road, Wembley, HA0 4LL (Premises licence number: 191921)
Permitted Hours: 00:00 – 23:59 (Monday to Sunday)
Distance: 293 meters

Ealing Newsagent, 154 Ealing Road, Wembley, HA0 4PY (Premises licence number: 18064)
Permitted Hours: 09:00 – 23:00 (Monday to Sunday)
Distance: 290 meters

Wembley Off Licence, 95 Ealing Road, Wembley, HA0 4BN (Premises licence number: 10437)
Permitted Hours: 09:00 – 23:00 (Monday to Sunday)
Distance: 300 meters

Sivashakthi Cash & Carry, 1-3 Atlip Centre, Atlip Road, Wembley, HA0 4LU (Premises licence number: 223236326)
Permitted Hours: 00:00 – 00:00 (Monday to Sunday)
Distance: 350 metres

Informative

On 31 December 2024, an email was sent to the applicant seeking further information about the premises licence application. This provided an opportunity for the applicant to demonstrate or provide evidence that their proposed application would not add to the cumulative impact within the local area.

[Annex A – Applicant email thread with Licensing Authority 08.01.2025]

Summary

The Statement of Licensing Policy stipulates that any new premises licence application falling within a specified Cumulative Impact Zone will not be granted unless the applicant provides compelling evidence that the proposed licensable activities will not contribute to the issues the CIZ seeks to address, such as street drinking and alcohol-related anti-social behaviour.

While I acknowledge the applicant's response and note that this application might typically be granted under different circumstances, there has been no compelling argument to suggest that this application wouldn't exacerbate the cumulative impact within the area.

The Licensing Authority maintains its stance of creating a rebuttable presumption and therefore seeks to engage the discretion of the Licensing Sub-Committee by submitting this representation against the premises licence application. As the applicant has not yet sufficiently demonstrated that the premises will not negatively contribute to the cumulative impact in the local area, the recommendation for refusal remains, in line with the current Statement of Licensing Policy.

However, if the Licensing Sub-Committee determines that there is enough evidence to grant the application, the Licensing Authority respectfully requests the following amendments to the operating schedule:

Amended Operating Hours:

The supply of alcohol (off the premises): 09:00 – 23:00 (Monday to Sunday)
The opening hours: 09:00 – 23:00 (Monday to Sunday)

Conditions

1. The premises shall operate and maintain a digital colour CCTV system. The CCTV system shall continually record whilst the premises are open for licensable activities and all recordings shall be kept for 31 days.
2. The CCTV system shall display on any recordings, the correct date and time.
3. The CCTV system shall be capable of obtaining clear images of every person entering or leaving the premises with further CCTV cameras covering the internal areas stipulated on the premises plan.
4. Any CCTV footage shall be made available to the Police and any authorised Officers from Brent Council upon request. CCTV footage shall be provided on either removable media (i.e., USB, hard drive, CD etc..) or via digital transfer within 24 hours of request.
5. Signage stating that CCTV is in operation shall be clearly and prominently displayed at the premises.
6. 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) any incidents of crimes or disorder.
 - b) any customers barred from the premises.
 - c) any complaints received.
 - d) any faults in the CCTV system
 - e) any visit by a relevant authority or emergency service.
7. Any entries into the log shall be made within 24 hours of any incident and shall contain the time/date of the incident, the nature of the incident, a description of the people involved, the action taken and details of the person responsible for the management of the premises at the time of the incident.
8. Staff training shall be undertaken by all members of staff involved with licensable activities. Additionally, all staff shall undergo refresher training every 12 months which shall also be recorded. Staff training shall include the following topics:
 - a) Age verification policy
 - b) Proxy sales
 - c) Refused sales and conflict management
 - d) Operating procedures permitted hours and relevant conditions
9. Training records shall include the time/date of the training, staff members name, training topic and must be signed off by the relevant staff member and the premises licence holder.
10. A copy of staff training shall be available upon request by Police and authorised officers from Brent Council.
11. A personal licence holder shall be at the premises at all times whilst open for licensable activities.
12. There shall be no high strength beers, lagers, and ciders above 6.0% ABV shall be sold at the premises.
13. There shall be no single cans or bottles of beer or cider shall be sold at the premises. A notice will be displayed notifying customers of this policy.

14. There shall be no miniatures under 5cl for spirits or under 200ml for wine sold at the premises. A notice will be displayed notifying customers of this policy.
15. There shall be no self-service of spirits on the premises with all spirits being located behind counter.
15. The premises licence holder shall display notice warning customers against drinking on the street in line with Brent Council's Public Spaces Protection Order.
16. Clear and legible notices shall be prominently displayed at the exit requesting patrons to respect the needs of residents when leaving the premises.
17. Deliveries shall only be made to the premises between 09:00 and 18:00 hours.
18. A Challenge 25 proof of age scheme shall be operated at the premises where the only acceptable forms of identification are recognised photographic identification cards, such as a driving licence, passport, or proof of age card with the PASS Hologram.
19. A Challenge 25 notice shall be conspicuously displayed at the point of sale.
20. A notice stating "No proof of age – No sale" shall be displayed at the point of sale.
21. A logbook shall be kept recording all refused sales of alcohol. The log shall contain the time/date of the refusal, a description of the customer, the name of the staff member who refused the sale, the reason the sale was refused and any other relevant observation. The refusals register shall be made available for inspection upon request of an authorised officer of a Brent Council and the Police.

Yours sincerely,

A handwritten signature in black ink that reads "E. Maldoom". The signature is written in a cursive style and is underlined with a single horizontal stroke.

Edwin Maldoom
Licensing Enforcement Officer

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Maldoom, Edwin

From: Kettan Patel - [REDACTED]
Sent: 13 January 2025 21:17
To: Maldoom, Edwin
Subject: Re: New Premises Licence Application: Sai Krupa Supermarket (REF: 33752)
Attachments: CB-personal licence.jpg; DPS consent form CB.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

Dear sir

Good afternoon

Hope you have had a lovely weekend

Thank you very much for your email.

1. I have taken over the business in July 2024 and Lease for the shop is 7 years from July 2024
2. I have a business partner and he holds the personal license. I have attached copy of licence and DPS consent form.
3. If the premises licence was granted , myself or my partner will be present on-site during operating hours.

Thanking you

Yours truly

Kettan Patel

From: Maldoom, Edwin [REDACTED]
Sent: 08 January 2025 10:22
To: shreesaikrupauk [REDACTED] [REDACTED]
Subject: RE: New Premises Licence Application: Sai Krupa Supermarket (REF: 33752)

Good morning Mr Patel,

Thank you for your response, I really appreciate it.

I would be grateful if you could clarify the following points:

1. In response to question two, you stated that you have held the business relating to this premises for seven years; however, you also mentioned that you started in July 2024. As such, it would be beneficial if you could confirm whether you meant seven months or seven years.
2. You mentioned that your personal licence is currently being processed by Harrow Council. Please note that if the premises licence application was granted, you would not be authorised to lawfully sell alcohol until you have received your personal licence from Harrow Council. Subsequently, you would then need to

apply to Brent Council to apply to vary the DPS, so that you could be named as the designated premises supervisor on the licence. Therefore, I would appreciate if you could confirm your understanding of this.

3. You have also stated that none of your staff currently hold a personal licence. One of the conditions that you have proposed states that "A personal license holder shall be present on the premises and supervise the sale of alcohol throughout the permitted hours for the sale of alcohol". If the premises licence application was granted, how would you ensure compliance with this condition unless you are always personally present on-site during operating hours, Monday to Sunday?

Many thanks,

Edwin Maldoom
Licensing Enforcement Officer
Regulatory Services
Brent Council

www.brent.gov.uk
@Brent_Council

From: Kettan Patel [REDACTED]
Sent: Tuesday, January 7, 2025 3:59 PM
To: Maldoom, Edwin [REDACTED]
Subject: Re: New Premises Licence Application: Sai Krupa Supermarket (REF: 33752)

Dear sir

Good afternoon

Hope you're doing well.

Wish you a very happy new year , hope you have had a great time.

I am extremely sorry for delay in reply.

Please find herewith answers for your last email.

Questions for Mr Patel

1. Please may you confirm who is, or who will be the business rates payer for this premises?
Myself - Kettan Patel
2. How long have you had the business that pertains to this address? (I.e., how long have you held the lease for this property?)
7 years - Starting from July 2024
3. Is the premises currently open for non-licensable activities? (I.e., open but not selling alcohol)
Yes - we are open for non-licensable activities
4. I note that you put a start time of 06:00 for the sale of alcohol for each day, is there a specific reason why you wish to sell alcohol at such an early hour?
The reason why 6am was chosen as the start of sales in because there a number of customers, who work at nights whose shifts end shortly before 6:00am

5. Are you aware that the premises fall in a CIZ (Cumulative Impact Zone), and do you understand what that means?

I am aware that shop falls within the CIZ. It suggests that there is a large number of premises which also sells alcohol in the area , which might have an impact on the number ASB incidents

6. Are you aware of any anti-social behaviour issues within the local area?

I am not aware of any anti-social within the immediate vicinity of the premises.

7. Given the number of off-licences within the local area, are there any specific alcohol related products that you will offer that is different to other premises licences of a similar nature locally?

I will selling the normal beers and other alcohol drinks. I plan to sell a variety of goods , so that the shop satisfies all a a one-stop shop. There will be party supplies , not offered by others , so everything can be purchased at the same time , including alcohol.

8. Are there any specific measures that you will put in place to mitigate against adding to the cumulative impact of the local area? (I.e., if the application were to be granted, what steps will the premises take to prevent adding to the current ASB issues locally?)

To help prevent any antisocial behaviour , a member of staff will regularly check outside the shop in order to prevent public nuisance and any crime and disorder.

9. What sort of alcoholic drinks do you intend to sell?

Beers , cider , spirits will be sold

10. Do you intend to sell single cans/bottles of beer, cider, and lager?

A minimum of 2 cans/bottles will be sold. A notice will be displayed to inform customers of this policy.

11. Do you intend to sell cans/bottles of beer, cider and lager that are over 6% ABV?

No cans/bottles of beer , cider or lager will be sold at that exceeds 6% abv.

12. Do you intend to sell any miniatures bottles of spirits or miniatures bottles wine at the premises? (i.e., under 5cl for spirits or under 200ml for wine?)

No miniatures of any alcohol drinks will be sold.

13. Do you intend to sell any spirits, and if so, where these be in the shop?

Spirits will located in the area behind the till to mitigate the opportunity for thefts.

14. I note that you haven't received your personal licence yet, have you applied to Harrow Council for this?

The application for my personal license is being processed.

15. Can you name the four licensing objectives, and do you understand what each one means?

I do know the four licensing objectives and their meaning and applications. I was advised to visit the licensing policy website for Brent to familiarises myself of your operating policies , in relation to the objectives.

16. What age verification policy will the premises adopt?

Challenge 25 will be implemented. Accepted forms of ID- driving license , valid passport , BBP cards.

17. Do you any experience running, or working in an off licence?
I have not owned an off-license before but i have shadowed a friend with an off-license business. However , my business partner is experienced in this area.
18. How many staff will be employed at the premises?
There will be 3 members of staff at any one time on duty
19. How many of these will hold a personal licence?
None of the staff currently holds a personal license.
20. Who will be responsible for the training?
I will be responsible for staff training . Training sessions will be documented.
21. What kind of topics will the training cover?
The four licensing objectives will be covered and explained in relation to the running of the off-license business. The importance of due diligence. Underage sales. Sales of drunk individuals and proxy sales.
22. Will there be refresher training for staff members?
Staff will receive refresher sales every 3 months or if any incident warrants an earlier periods.

If you require more information , please email me.

Looking forward to hearing from you.

Kind regards

Kettan Patel

From: Maldoom, Edwin [REDACTED]
Sent: 07 January 2025 13:15
To: [REDACTED]
Subject: RE: New Premises Licence Application: Sai Krupa Supermarket (REF: 33752)

Good afternoon Mr Patel,

I would be most grateful if you could provide me with an update regarding the below email.

I'm mindful that the 28-day consultation period ends next week, however, irrespective of this, I will be submitting a representation against the premises licence application. This is because the premises falls inside one of the Council's Cumulative Impact Zones – and thus engages the Council's "rebuttable presumption" to refuse any new premises licence application, as set out within the Council's Statement of Licensing Policy.

Many thanks,

Edwin Maldoom
Licensing Enforcement Officer
Regulatory Services
Brent Council

From: Maldoom, Edwin

Sent: Tuesday, December 31, 2024 1:32 PM

To: [REDACTED]

Subject: New Premises Licence Application: Sai Krupa Supermarket (REF: 33752)

Good afternoon Mr Patel,

Thank you for taking the time to speak to me earlier, I appreciate that I caught you at a busy time. As mentioned over the phone – I am the delegated officer on behalf of the Licensing Authority, in whose area the above-mentioned application is located, and who is authorised for the purposes of exercising its statutory function as a 'Responsible Authority' under the Licensing Act 2003.

Having read the premises licence application, I would be most grateful if you could answer the following questions. This will hopefully provide me with further information and improve my broader understanding of what is proposed. Of course, this isn't an exhaustive list of questions, and there might be some further questions that require clarification in due course.

Questions for Mr Patel

1. Please may you confirm who is, or who will be the business rates payer for this premises?
2. How long have you had the business that pertains to this address? (i.e., how long have you held the lease for this property?)
3. Is the premises currently open for non-licensable activities? (i.e., open but not selling alcohol)
4. I note that you put a start time of 06:00 for the sale of alcohol for each day, is there a specific reason why you wish to sell alcohol at such an early hour?
5. Are you aware that the premises fall in a CIZ (Cumulative Impact Zone), and do you understand what that means?
6. Are you aware of any anti-social behaviour issues within the local area?
7. Given the number of off-licences within the local area, are there any specific alcohol related products that you will offer that is different to other premises licences of a similar nature locally?
8. Are there any specific measures that you will put in place to mitigate against adding to the cumulative impact of the local area? (i.e., if the application were to be granted, what steps will the premises take to prevent adding to the current ASB issues locally?)
9. What sort of alcoholic drinks do you intend to sell?
10. Do you intend to sell single cans/bottles of beer, cider, and lager?
11. Do you intend to sell cans/bottles of beer, cider and lager that are over 6% ABV?
12. Do you intend to sell any miniatures bottles of spirits or miniatures bottles wine at the premises? (i.e., under 5cl for spirits or under 200ml for wine?)
13. Do you intend to sell any spirits, and if so, where these be in the shop?
14. I note that you haven't received your personal licence yet, have you applied to Harrow Council for this?
15. Can you name the four licensing objectives, and do you understand what each one means?

16. What age verification policy will the premises adopt?
17. Do you any experience running, or working in an off licence?
18. How many staff will be employed at the premises?
19. How many of these will hold a personal licence?
20. Who will be responsible for the training?
21. What kind of topics will the training cover?
22. Will there be refresher training for staff members?

Many thanks,

Edwin Maldoom
Licensing Enforcement Officer
Regulatory Services
Brent Council

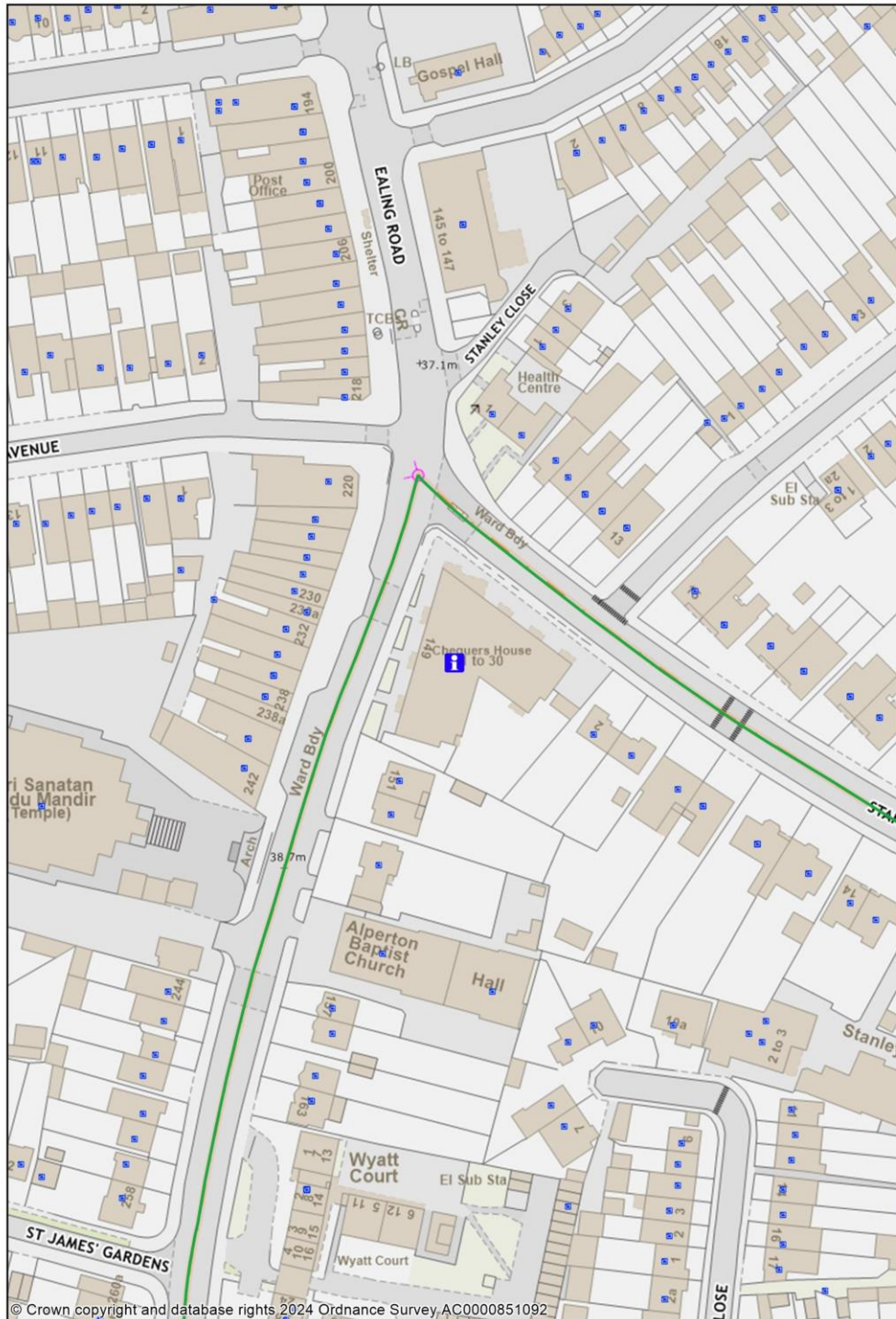
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Basemap Map



1:1250

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