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Alcohol and Entertainment Licensing Sub-Committee

Wednesday 15 October 2025 at 10.30 am Boardrooms 1 & 2 - Brent Civic Centre, Engineers Way, Wembley HA9 0FJ

Please note that this meeting will be held in person with members of the Sub-Committee required to attend in person.

The press and public are also welcome to attend this meeting in person. Please note the meeting is not scheduled for live webcast

Membership:

Members Substitute Members:

Councillors: Councillors:

Ahmed (Chair) Akram, Bajwa, Chohan, Long, Mahmood, Hylton Rajan Seelan & L Smith

Clinton

For further information contact: Devbai Bhanji, Governance Assistant

Tel: 020 8937 6841; Email: devbai.bhanji@brent.gov.uk

For electronic copies of minutes and agendas please visit: Council meetings and decision making | Brent Council



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 of 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.

Application for a New Premises Licence by Swatiben Thakkar for the 1 - 69 premises known as Sanjit Express, 327 Harrow Road, Wembley, HA9 6BA, pursuant to the provisions of the Licensing Act 2003



LICENSING ACT 2003

Application for New Premises Licence

1. The Application

Name of Applicant:	Swatiben Thakkar	
Name & Address of Premises:	Sanjit Express, 327 Harrow Road, Wembley, HA9 6BA	
Applicants Agent:	Raj Jagtap	

The application is for a new premises licence as follows:

To provide: the Sale of Alcohol and to remain open from 9am to 11pm 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 page 3 - 4 of the application.

4. Relevant Representations

Representations have been received from the Police, Licensing Officer and local Councillor.

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 Rep
- C. Licensing Rep
- D. Cllr Rep
- E. 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: 19957 Application No: 35660 Date: 31 July 2025

LICENSING ACT 2003 Licence:Premises Licence New Application Application No: 35660

Dear Sir/Madam,

Applicant:Mrs SWATIBEN JAYDEEP KUMAR THAKKAR

Date Received: 31 July 2025

An application was made to Brent Council under the Licensing Act 2003 by the above-named applicant. 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:28 August 2025.

Yours faithfully

Sima Naran Administration Officer Regulatory Services

Part 1 - Premises Details

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

SANGIT EXPRESS 327 Harrow Road, Wembley, Brent, HA9 6BA

Telephone Number at premises (if any):

Non domestic rateable value: 7,000

Part 2 - Applicant Details

Proposed Licence Holder:
Mrs SWATIBEN JAYDEEP KUMAR THAKKAR

Agent Details

RAJ JAGTAP

62 CROWNWALK, WEMBLEY, MIDDLESEX, HA9 8HU saiarchi@yahoo.com 07961743174

Part 3 - Operating Schedule

When do you want the premises licence to start? 01-08-2025

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: LOCAL SUPERMARKET - GROCERY SHOP

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 oremises				
Day	Start Time	i≕nd Time		
Monday	09:00	02:00		
iruesday	09:00	02:00		
Wednesday	09:00	02:00		
rrhursday	09:00	09:00		
Friday	09:00	02:00		
\$aturday	09:00	02:00		
Sunday	09:00	02:00		

ON CHRISTMAS AND BANK HOLIDAYS FROM 09:00- 02:00

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

Swatiben JaydeepKumar Thakkar

Date of birth:

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From: Sai Archi <saiarchi@yahoo.com>

Sent: 29 July 2025 16:33

To: Business Licence <business.licence@brent.gov.uk>

Subject: Re: New Premises Licence application - Sangit Express

Dear Sima

Thank you for the reply.

We will prepare a detailed statement to satisfy and support our New Premises Application for Sangit Express at 327 Harrow road.

Kindly note we will change the opening hours for sale of Alcohol from 09.00 to 23:00hrs and that will mitigate any concerns and help achieve all the Licensing objectives (under the *Licensing Act 2003*)

- preventing crime and disorder
- public safety
- preventing public nuisance
- protecting children from harm.

The applicant will acceet all the conditions from the Licensing Authourity. Hope that shall be acceptable.

Note - The Premises is a new re-furbished local grocery shop with excellent layout clean, simple neat and tidy with 24x7 CCTV within and on the Premises.

Thanks &

Regards

RAJ

SAI ARCHITECTS & ASSOCIATES - CONSULTANTS - CHARTERED

SPACE ARCHITECTURE & INTERIORS

(LABC PARTNER WITH BRENT BLDG CONTROL)

RAJ JAGTAP - Principal



SALE OF ALCOHOL OFF THE PREMISES – Sangit express 327 Harrow road, Wembley, HA9 6BA as shown on PLAN. ALL CALENDER EVENT DAYS AT WEMBLEY - FROM 09:00am -23:00pm (MONDAY to SUNDAY) 7 Days a week.

Licensing objectives:

All Steps are in place to promote all the four licensing objectives together for the proposed New Premises Licence at Sangit express off the premises. All precautions & safety measures are in place on the premises and all adoption of best practice guidance followed for the sale of Alcohol. All premises licensing objectives are achievable in spite of proposed opening hours on all the week days and all EVENT days at Wembley if allowed for the Sangit express Premises at 327 Harrow road, Wembley, HA9 6BA.

On a event days hire trained security personnel: One of the most important things a Premises can do to prevent crime and disorder is to hire trained security personnel. These individuals can monitor the establishment, keep an eye on potentially problematic individuals, and intervene before a situation gets out of hand on a event day.

Implement ID checks: Implementing ID checks at the door/counter help prevent underage sale and keep out known troublemakers.

Limit alcohol sale: Overconsumption of alcohol can lead to disorderly behaviour and even violence. By limiting alcohol sale through measures, like limited sale.

Maintain a well-lit environment: A well-lit environment can deter criminals and help security personnel identify potential troublemakers.

Use surveillance cameras: Installing surveillance cameras throughout the premises can help identify criminal activity and provide evidence in the event of an incident.

Train staff to handle difficult situations: All staff members should be trained to handle difficult situations, such as confrontations with buyers or incidents of violence. This can help prevent situations from escalating and ensure the safety of everyone in the premises.

a) The prevention of crime and disorder

Effective management of premises, including written procedures for managing incidents.

- Keeping an incident book and daily register which lists incidents and actions taken by staff and management.
- Ensuring that staff receive proper training and refresher training on relevant issues, policies and procedures.
- Ensuring provision of effective CCTV in and around premises. 24hrs/30 days recording. Integrated security systems on site.
- Accommodating Met Police when it requests copies of CCTV images.
- Ensuring provision of external lighting and security measures.
- Employing SIA registered door supervisors when appropriate.
- Using Radiolink or similar schemes e.g. Shopwatch.
- Adopting best practice guidance where available.
- Maintaining a relevant dispersal policy where appropriate.
- Displaying local transport information to facilitate safe journeys.
- Contacting and co-operating with police and Licensing Standards Officers when incidents of a violent,

anti-social or otherwise criminal nature occur.

- Participating in anti-violence and abuse strategies and campaigns such as Ask for Angela.
- Displaying notices regarding the use of illegal substances or weapons, stating that offences will be reported to the police.
- Working with the Community Safety Partnership and Alcohol and Drug Partnership.
- Displaying notices to make patrons aware of any local Byelaws prohibiting consuming alcohol in public places.
- Monitoring of display areas (via staffing in larger shops or layout consideration in smaller shops).
- Using time locks on tills so that sales of alcohol cannot be made outside the hours of the operating plan.
- Using metal detection wands.
- Having a violence reduction strategy document, including matters such as a glassware, anti-violence patrols by staff, and toilet supervision.
- Deliberately running below capacity to afford a comfort factor to avoid conflict, violence or aggression within the premises.
- Providing conflict management training for staff. Security reviews shall be regularly held after 3 months

A written policy to deal with all types of accidents & emergency incidents will/should be in place at the premises.

An accident book will/should be kept in order to record all accidents or incidents and made available for inspection.

Doors and frames ARE reinforced making it more difficult for intrusion. Shutters are installed externally to prevent any access after opening hours.

Windows/Doors that are likely entry points ARE locked and made of toughened glass with electronic door release panic button.

Provision of secure deposit box. Intruder alarm installed.

Staff to keep a close watch on all customers, especially groups of people and anyone who appears to be loitering.

Provision of litter bins & other security measures, such as lighting outside.

There is a clear view of the whole of your premises at all times. No displays to block your view. Use electronic forged note detector.

Take great care to check the references of any new staff when employed.

b) Public safety

- A full risk assessment taking into account public safety will/should be carried out at the premises to identify potential hazards posed to staff or customers and setting out precautions to manage the hazards. Easy means of escape on site/premises clearly visible, unobstructed and well maintained including areas outside exits.
- Ensuring that premises, both internally and externally, are maintained in good, clean and tidy condition at all times.
- Having a suitable litter and waste management programme including provisions for recycling.
- Limiting the amount of alcohol sold just before the conditioned sale hours.
- Ensuring there is a sufficient number of people employed or engaged to secure the safety of the premises.
- Ensuring the appropriate instruction, training and supervision of staff.

- Conducting regular testing and certification (where appropriate) of appliances.
- Having accurate disability access statements. If required.
- Having familiarity with the provisions of the Equality Act 2010.
- Ensuring there is clear and accurate signage in and around premises.
- Fully completing risk assessments, for both premises and proposed activities to be carried out.
- Developing policies on crowd management and dispersal, both in the ordinary course of operation and in an emergency.
- Regular maintenance and testing of procedures, and security and safety systems.
- Designating a "safe space" within the premises in which vulnerable persons can be provided with assistance.
- Co-operating with police and Licensing Standards Officers including by allowing access to all relevant policies and procedures.
- Ensuring that, where possible, a personal licence holder is present on the premises.
- Conducting, developing and maintaining a Fire Risk Assessment which meets sector specific guidance.
- Reviewing the Operating Plan at least once a year, and if necessary asking the landlord to authorise a Variation.
- Ensuring access and exits to the premises provide for ease of access for emergency vehicles.
- Seeking advice from the Fire Brigade and Rescue Service about any fire prevention issues with the premises.
- Seeking advice from the council's Environmental Health & Trading Standards team on food safety, workplace safety and pollution.
- Being aware of the role of the building standards legislation which affects their premises
- Providing first aid facilities and an area in which incapacitated persons can be placed pending the attendance of emergency services. **First aid boxes** should be available at the premises

Appropriate fire safety devices easily accessible in case of fire (Fire extinguishers) Installation of appropriate and adequate safety equipment, warning systems, emergency lighting and evacuation procedures.

Fully comprehensive safety checks of all electrical equipment to be undertaken within the premises annually by a competent person and evidenced by certification to National Inspection Council for Electrical Installation Contracting (NICEIC) Standards.

Appropriate instruction, training & supervision of those employed or engaged to secure the safety of the premises. Effective CCTV in around premises.

c) The prevention of public nuisance

- Taking a proactive and risk-based approach to public nuisance.
- Ensuring that door staff encourages customers leave quickly and quietly.
- Doors should be kept closed whilst the premises licence is in use to prevent noise breakout. Ventilation should be provided by mechanical means.
- Installation of soundproofing, air conditioning, acoustic lobbies and sound limitation devices.
- Being mindful of the location of the premises, hours of operation and activities.
- Complying with all conditions of the premises licence.
- Ensuring appropriate control measures are in place and staff training is up to date and relevant.
- Considering public nuisance when establishing the design and layout of the premises.

- Ensuring adequate supervision of any outdoor areas, entering/exiting the premises.
- Sharing of best practice via trade groups.
- Participating in communication to resolve any issues that may arise.
- Considering the steps to be taken to prevent queuing.
- Liaising with public transport providers.
- Carefully managing arrangements for collection and disposal of waste and empty scraps.
- Having a good neighbour policy and attending community council meetings as appropriate.
- Taking positive action, for example, on the prompt removal of graffiti.

Control of noise

Self manually operated closing main door, adequate false ceiling to concrete 1st floor slab buffer prevents any noise.

No noise pollution. Effective ventilation system at the rear open area premises. Area around premises is always clean and tidy.

Control of smells

It is essential that no bad or obnoxious smells come from the premises therefore extraction is in place to be used to ensure the neighbourhood is not offended their by causing a nuisance. Proper and sufficient lighting installed, including security lighting in and around the premises CCTV operating 24hrs/30 days recording.

Crowd control

Effective queue management in place in case of crowd, by licensed security staff, to include the prevention of persons after closing time.

d) The protection of children from harm

All/sufficient precautions taken to see children are not exposed to any hazard.

Health & Safety measures are in place where equipment is of danger to young persons. Entry policy will include diligent measures on proof of age.

THE CHALLENGE / CHECK 21/25 SCHEME – NO ID NO SALE! **policy**. **'Challenge 21' scheme** Only accept photographic driving licences, passports or PASS (Proof of Age Standards Scheme) cards approved as means of ID.

Display posters at the premises stating that it is an offence to purchase alcohol on behalf of an underage person (proxy sales).

- Developing a robust refusal system and recording of refusals procedures.

 The book should be made available to Police and authorised Council officers on request
- Proactively laying out off-sales premises to discourage impulse buying. Covers/shutters on not allowed sales dates events. If any
- Ensuring adequate staff training regarding the refusal policy and the effects of alcohol on the body
- Making available low/non-alcoholic products.
- Providing a good range of reasonably priced soft drinks and/or driver's shelves.
- Ensured licensed hours are reflective of operating hours.
- Being aware of irresponsible promotions, and complying with the law of alcohol pricing and

irresponsible drinks promotions.

- Making available information with regard to lower risk drinking, and contact points where support can be obtained for problem drinking.
- Preventing overcrowding.

Effective & responsible management

Sufficient precautions taken to see children are not exposed to any hazard to secure the protection of children from harm.

Compulsory ID checks for under age children's. NO ID NO SALE!

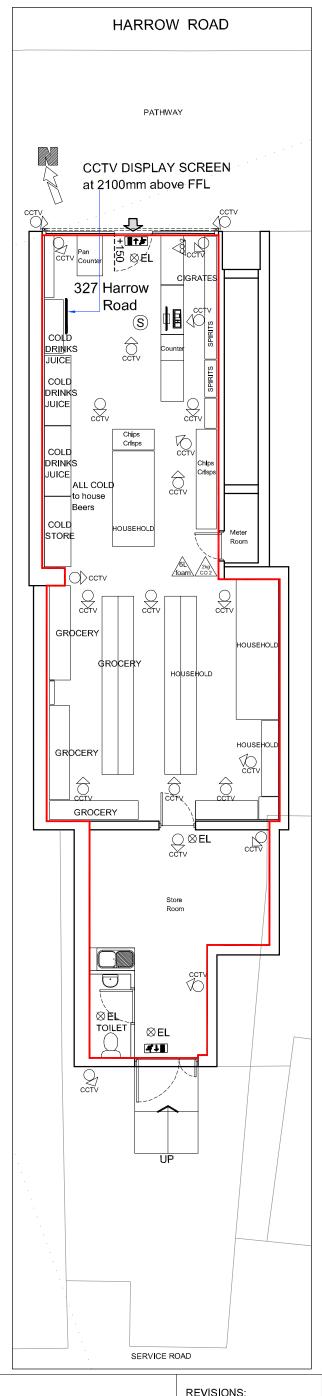
Proper and clear display of Legal Notice's on the premises.

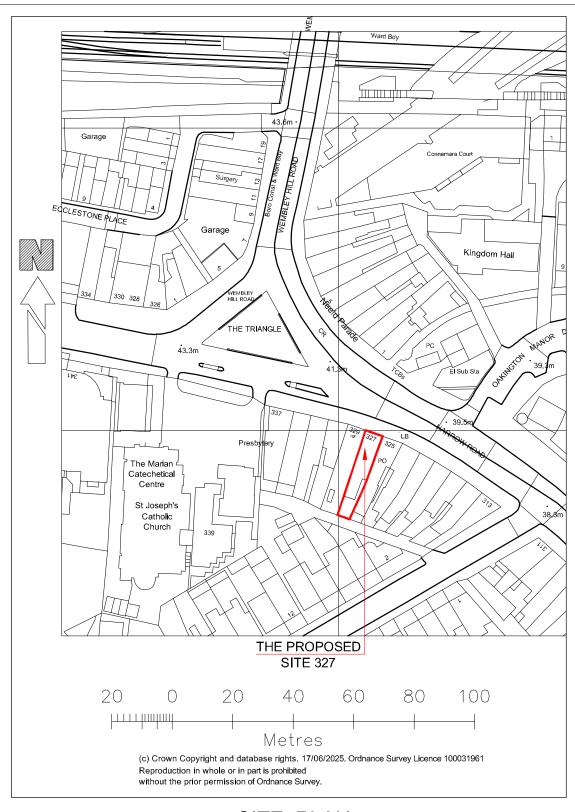
With all the Safety and Preventive measures in place and SHALL be practised as per the good practice guidance till 23:00hrs at Sangit express 327 Harrow road, Wembley, HA9 6BA address and as per the New Premises licence conditions for

- 1) The prevention of crime and disorder
- 2) Public safety
- 3) The prevention of public nuisance
- 4) The protection of children from harm

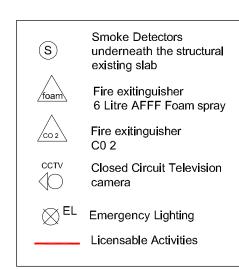
Four main objectives under the Licensing act 2003. We request you to grant us the New Premises Licence at Sangit express 327 Harrow road, Wembley, HA9 6BA with the Hours as scheduled for all the week days and on All the Event days at Wembley if allowed.



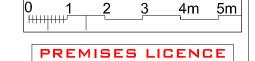




SITE PLAN SCALE 1:1250 @ A3

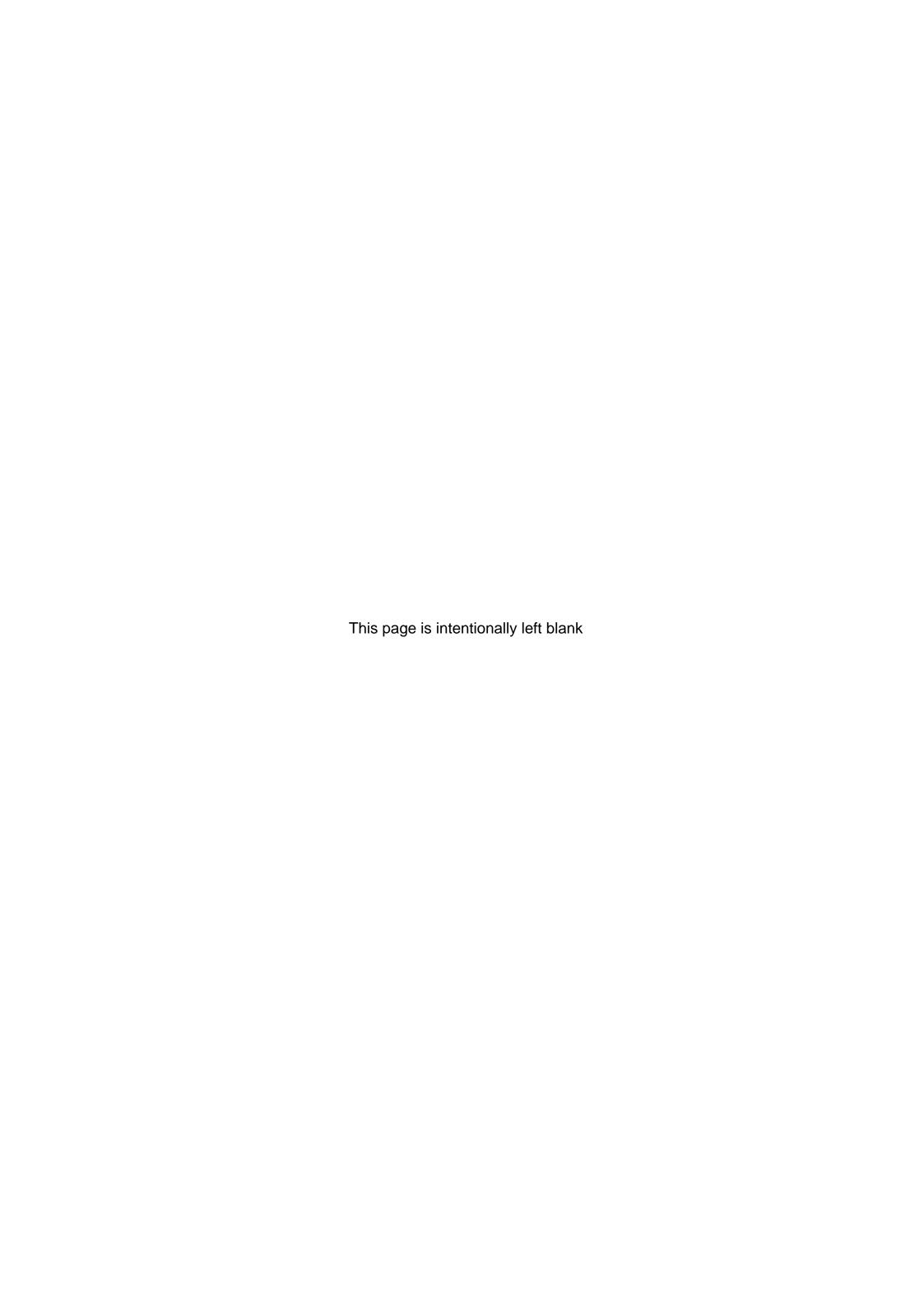


PROPOSED GROUND FLOOR PLAN SCALE 1:100 @A3



		APPLIC						
	NOTES:	REVISIONS:	S A I ARCHITECTS &		RIBA (S	tage-A) from Incep		
Figured dimensions are to be used in preference to scaled dimensions. Contractors to verify all dimensions on site before commending any work or shop		ASSOCIATI	ES-CONSU	LTANTS		TITLE/VIEW	Proposed Ground	
	drawing. Any discrepancies between these drawing and any other documents, drawings and the actual situation encountered on site should be conveyed to SAI Architects & Associates.				62, Crownwalk, Wemble Tel 07961 743174	y, Middlesex,London HA9 8HU E:salarchl@yahoo.com	PROJECT	Planning- New P
	Consultants and / or contract administrator immediately. This drawing is to be read in conjuction with other issued project documentation and drawings.		PROJECT NO.	25/PL-06/PL	DRAWN BY	RJ	LOCATION	SANGIT EXPRES
	All works to comply with the latest relevant code of practice, British Standards and Building Regulations and are to be the satisfaction of Local Statutory Authorities.		DRAWING No ac	ne 15 ^{310/PL}	DATE	23/07/25		327 Harrow road Middlesex, Brent
	No part of this drawing may be reproduced without the permission of SAI Architects & Associates - Consultants, This drawing is the property of Client, It must not be copied in whole or in part or distributed without their written permission. Copyright is reserved ©.		SCALE	1:100	REV.	*		London HA9 6BA

		APPLICATION	ı		
	RIBA (Stage-A) from Inception to (L)-Occupatio				
	TITLE/VIEW	Proposed Ground Floor Plan			
U	PROJECT	Planning- New Premises Licence			
	LOCATION	SANGIT EXPRESS,			
		327 Harrow road, Wembley, Middlesex, Brent			
		London HA9 6BA	Г		





Brent Civic Centre Engineers Way Wembley Middlesex HA9 0FJ

email edwin.maldoom@brent.gov.uk

web www.brent.gov.uk

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

28 August 2025

Ref: 35660

Dear Business Licence,

Licensing representation against the premises licence application in respect of Sangit Express, 327 Harrow Road, HA9 6BA.

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.

Proposed Operating Schedule

The premises licence application originally sought for the supply of alcohol for consumption off the premises between 09:00 and 02:00, Monday to Sunday. However, the applicant's agent subsequently confirmed that the proposed hours would be reduced to 09:00 to 23:00, Monday to Sunday.

It is noted that the applicant has put forward only a limited number of conditions to promote the licensing objectives, many of which lack clarity or any further detail behind them. The application refers, albeit somewhat ambiguously, to the below measures:

Staff training

Page 1 of 7

- CCTV provision
- An age verification policy
- An incident log

However, a number of conditions appear inconsistent, unclear, or indicate they have been copied from a separate premises licence application with a completely different business model. The following examples are provided below for reference, though this list isn't exhaustive:

"Installing surveillance cameras throughout the bar" – The reference to the premises being a "bar" contradicts the nature of the application, which is for an off-licence.

"Keeping doors and windows closed, especially during events indoors" – This is irrelevant, as there would be no "events indoors" at an off-licence.

"Crowd control: Effective queue management in place in case of crowd, by licensed security staff, to include the prevention of persons after closing time" — There is no justification or operational need for crowd control or queue management at an off-licence, nor for security staff to prevent entry after closing time.

"Develop a clear code of conduct for buyers" – This lacks any detail regarding what such a code would entail, its intended purpose, how it pertains to the licensing objectives and how it would be implemented or enforced.

"Ensure that your staffs understand that as part of our routine security measures their belongings ARE/will be subject to random inspections" – There is no justification for staff searches at an off-licence.

Subsequently, this raises concerns about the overall veracity and intent behind the proposed measures. Rather than demonstrating a thoughtful and considered approach to promoting the four licensing objectives, the steps put forward appear superficial, generic, unclear, and, in some cases, unsuitable for an off-licence situated in a particularly challenging area.

Furthermore, the application fails to include any meaningful measures to address street drinking and alcohol-related anti-social behaviour in the local area. It also makes no reference to the Cumulative Impact Zone (CIZ), despite the premises being located within one. It would be expected that an applicant seeking a premises licence in a designated CIZ would acknowledge this and provide detailed information on how their application would avoid contributing to cumulative impact of the local area and not exacerbate the issues the CIZ was established to address in the first place.

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

Page 2 of 7

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 detail can be found in Appendix 6: Cumulative Impact Zones (pages 52–65) of the Council's Statement of Licensing Policy.

Wembley Central (Wembley High Road / North End of Ealing Road)

The relevant CIZ includes the entirety of Harrow Road, from the junction with the A406 North Circular to Wembley High Road and the surrounding area.

Brent's Statement of Licensing Policy describes this area as one experiencing medium levels of deprivation and high levels of alcohol-related crime, particularly around Wembley Triangle – which is in close proximity to the premises.

Between July 2019 and July 2022, the following incidents were reported to the Police in this area:

- 279 reports to the Police
- 118 relates to anti-social behaviour
- 39 related to public order offences
- 18 related to robbery
- 104 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 to 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:

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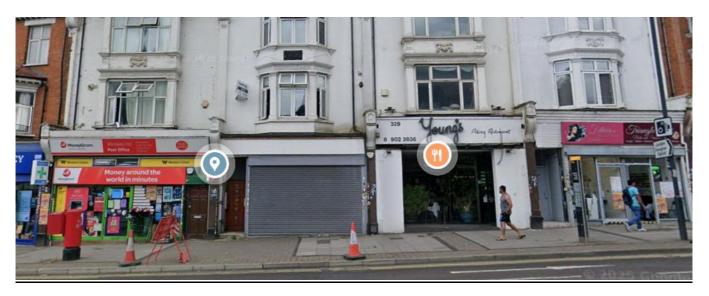
- a) not to consume in that place anything which is, or which the officer reasonably believes to be, intoxicating liquor
- b) to surrender anything in his/her possession which is, or which the officer reasonably believes to be, intoxicating liquor or a container for such liquor (other than a sealed container)
- 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 327 Harrow Road, HA9 6BA, within a ground-floor commercial unit beneath a residential block of flats, in a parade of shops close to Wembley Triangle. Opposite the premises is another parade of shops, including an existing off-licence and food-led businesses.

This stretch of Harrow Road becomes particularly busy on Wembley Stadium event days, with significant pedestrian movement towards bus stops, taxis, and Wembley Central Overground Station. It should be noted that off-licences in the area are subject to a voluntary agreement not to sell alcohol on football event days.



There are five similar off-licences already operating in the immediate vicinity:

Triangle Food & Wine, 1 Wembley Hill Road, HA9 6QU (Premises licence number: 175893)

Permitted Hours: 08:00 – 00:00 (Monday to Saturday) 10:00 – 22:30 (Sunday)

Distance: 28 Metres

Brother's Superstore, 4 Wembley Hill Road, HA9 6QU (Premises licence number: 157127)

Permitted Hours: 08:00 – 23:00 (Monday to Saturday), 10:00 – 22:30 (Sunday)

Distance: 41 Metres

Shree Superstore, 11 Wembley Hill Road, HA9 8AF (Premises licence number: 251453)

Permitted Hours: 09:00 – 00:00 (Monday to Sunday)

Distance: 81 Metres

Page **4** of 7

Wembley Convenience Store, 297 Harrow Road, HA9 6BD (Premises licence number 274903)

Permitted Hours: 00:00 – 00:00 (Monday to Sunday)

Distance: 110 Metres

Jeen Cash & Carry, 306 Harrow Road, HA9 6LL (Premises Licence Number: 161693)

Permitted Hours: 00:00 – 00:00 (Monday to Sunday)

Distance: 110 Metres

Summary

Brent Council's Statement of Licensing Policy clearly states that any new premises licence application within a designated CIZ will not be granted unless compelling evidence is provided demonstrating that the application will not contribute to cumulative impact in the local area, specifically in relation to alcohol-related anti-social behaviour and street drinking. In this instance, no such evidence has been provided.

The application also fails to acknowledge the existence of the CIZ, does not propose any meaningful measures to mitigate the issues the CIZ was established to address, and includes conditions that are either irrelevant, vague, or appear to have been copied from an application for a different type of premises.

As such, this representation is submitted to engage the Licensing Sub-Committee's discretion and to reiterate the Council's position on new applications that fall within a CIZ. In the absence of compelling evidence to justify a departure from the Statement of Licensing Policy, the Licensing Authority believes that the application should be refused.

However, should the Sub-Committee determine that sufficient evidence has been presented to justify a departure from the Statement of Licensing Policy, and that the application would not contribute to cumulative impact, it is respectfully requested that the conditions set out at the end of this representation be imposed in full.

Yours sincerely,

E. Maldoom

Edwin Maldoom

Licensing Enforcement Officer

<u>Licensing Authority's Proposed Conditions for Licensing Sub-Committee</u>

The prevention of crime and disorder

- 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. The CCTV system shall also display the correct date and time on any recordings.
- 2. The CCTV system shall capture clear images of every person entering or leaving the premises with further CCTV cameras covering the publicly accessible areas stipulated on the premises plan, including the front external area.
- 3. CCTV footage shall be made available for immediate viewing upon request by the Police and any authorised Officers from Brent Council by a member of staff who is conversant with the operation of the CCTV system. CCTV footage shall also be provided to the Police and any authorised Officers from Brent Council, in a readily accessible format on removable media (I.e., USB, hard drive, CD etc..) or via digital transfer within 24 hours of request.
- 4. A notice stating that CCTV is in operation shall be clearly and prominently displayed.
- 5. An up-to-date incident log shall be kept and maintained at the premises which shall record the following:
- a. any incidents of crime and 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.

Any entries into the log shall be made within 12 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. The incident log shall be available for inspection upon request by an authorised officer of Brent Council or the Police

- 6. 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.
- 7. Staff training shall be undertaken by all members of staff involved in licensable activities. All staff shall also undergo refresher training at least once every 12 months, with all training recorded. Training shall include the following topics:
- a. age verification policy and prevention of proxy sales.
- b. recognising signs of drunkenness, intoxication, and identifying habitual street drinkers.
- c. procedures for recording refused sales relating to (a) or (b), and conflict management.
- d. the four licensing objectives.
- e. operating procedures, permitted hours, and premises licence conditions.

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. A copy of staff training shall be available upon request by Police and authorised officers from Brent Council.

- 8. A register shall be kept recording all refused sales of alcohol. The register 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
- 9. The DPS shall produce a written list of all staff members who are trained and authorised to sell alcohol on behalf of the DPS. This list shall have the staff members name, the signature of the staff member and the authorisation date.
- 10. There shall be no self-service of spirits on the premises with all spirits being located behind counter.
- 11. There shall be no sales of beers, ales, lagers, or ciders above 6.0% ABV.
- 12. There shall be no sales of any single cans or bottles of beer, or cider. A notice advising customers of this policy shall be displayed.
- 13. There shall be no sales of any spirit miniatures under 5cl or wine under 200ml. A notice advising customers of this policy shall be displayed at the point of sale.
- 14. A personal licence holder shall be at the premises at all times whilst open for licensable activities.
- 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.

Public safety

16. All entry and exit points (including fire exits) shall be free from any obstructions.

The prevention of public nuisance

17. Clear and legible notices shall be prominently displayed requesting patrons to respect the needs of residents when leaving the premises.

The protection of children form harm

- 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. A Challenge 25 notice shall be also conspicuously displayed at the point of sale.
- 19. Notices shall be conspicuously displayed at the point of sale reminding customers that proxy sales are unlawful.



From: Maldoom, Edwin

Sent: 09 September 2025 10:43

To: Sai Archi

Cc: Business Licence; Legister, Linda

Subject: RE: CONSULT: New Premises - Sangit Express, 327 Harrow Road, HA9 6BA -

35660

Good morning Raj,

Apologies for the delayed response — I was on annual leave last week and only returned yesterday morning.

Thank you for your clarification regarding the inclusion of certain conditions in the initial application, and for providing a revised list of conditions. However, I do note that even within the updated list, there are still measures put forward that I believe are not relevant to an off-licence. As such, this brings me back to the initial concern I raised in my representation.

Nonetheless, I'm sure that my colleagues will ensure this revised list is included in the hearing pack, so that the Licensing Sub-Committee is fully informed before the hearing.

As mentioned in my previous email, I do not believe that any amendments made to the application would be sufficient enough to change the Licensing Authority's position. Therefore, I maintain that the representation should be upheld, and the application will have to be determined by the Licensing Sub-Committee on 15 October 2025.

In my view, granting this application would contribute to the very issues the CIZ seeks to address, thereby undermining the licensing objective of the prevention of crime and disorder. This position is also set out within the Council's Statement of Licensing Policy regarding new premises licence applications that fall within a designated CIZ.

Ultimately, however, it will be for the Licensing Sub-Committee to determine whether there is sufficient compelling evidence put forward by you/your client that the proposed licensable activities outlined in the application will not contribute to the cumulative impact in the local area.

Many thanks,

Edwin Maldoom Licensing Enforcement Officer Regulatory Services Brent Council

www.brent.gov.uk

@Brent Council

From: Sai Archi

Sent: 03 September 2025 12:06

To: Maldoom, Edwin

Cc: Business Licence; Legister, Linda

Subject: Re: CONSULT: New Premises - Sangit Express, 327 Harrow Road, HA9 6BA -

35660

GM Edwin

Hope you are well.

Thank you for the email and reply.

We have been submitting a number of New Premises LICENCE on behalf of our Clients since 2011. You are write in correcting me there was a previous application for a NEW premises Licence submitted for a Bar and Resturant for 118 Wembley Park drive HA9 8HP in 2023.

We use a standard cover letter to support our Applications to mitigate and help to try achieve all the 4- Main objectives of Licensing Act 2003. Same was saved and used for Sangit Express and I forgot to amend to suit an off-licence. AND the list isn't exhaustive very rightly pointed.

Please kindly ignore the bar word instead it should have been off-licence. Attached is the letter again.

Since its in a CIZ the Premises will ensure compliance with the following,

- 1) Operate with the Local Authority operational zones and timings.
- 2) We shall work operate with the specific restrictions and duties imposed by the Authorities.
- 3) We will Engage all the relevant local Licensing Authorities in the process to ensure and comply with the regualtions and to avoid any potential conflicts.
- 4) We will adapt the best Business Practices, inparticular, policies for Proof of age, sale of Alcohol, and management of public entering the premsie.
- 5) We have all the Insurance and Lease agreements are in place for the premises.
- 6) We will have All the documentation will be Maintained for CCTV records 24X7 for 31 days as per the Home office requirements, Incident and Accident log books with a Refusal log book etc will be at the New Premsies.

With the ABOVE stricter operating conditions and robust implementation shall help in addressing most of the CIZ compliance and adhere to the Local Authority rules to manage risks to the area and aim to control any negative impacts on the community, such as noise, anti-social behavior and other nuisances.

Kindly update on the progress of the application and do visit the NEW-refurbished shop Sangit Express, 327 Harrow Road, HA9 6BA. We have all that as per Good practice and Home Office requirements for an Off licence shop,

The mandatory conditions put in place by the 2010 order were replaced, from October 2014, by those set out in the Licensing Act 2003 (Mandatory Licensing Conditions) (Amendment) Order 2014 (SI 2014/2440). A "responsible person" must ensure compliance with the mandatory conditions. In relation to licensed premises this means:

- the holder of a premises licence in respect of the premises
- the designated premises supervisor (if any) under such a licence, or
- any individual aged 18 or over who is authorised for the purposes of section 153(4) of the Licensing Act 2003 by such a holder or supervisor

The premises has 24X7 CCTV within and outside the premises with 18 CCTV + cameras as shown on the plan submitted.

A personal LICENCE holder as a DPS for the premises.

The premises will have a refusal logbook on site

All the staff will be given training as per the Home office guidelines

Age verification Notices will be displayed at the till and within the premises

All the Accident and Incident book will be at the premises.

Operating hours will be 09:00- 23:00 hrs daily

If you need any further information let us know.

Thanks &

Regards

RAJ

SAI ARCHITECTS & ASSOCIATES - CONSULTANTS - CHARTERED SPACE ARCHITECTURE & INTERIORS (LABC PARTNER WITH BRENT BLDG CONTROL)

RAJ JAGTAP - Principal
Architect
MSc In Urban Design, The Bartlett, UCL

On Thursday 28 August 2025 at 17:14:50 BST, Maldoom, Edwin edwin.maldoom@brent.gov.uk> wrote:

Good afternoon Raj,

Sima has kindly forwarded your email to me – as you might be aware, I am the consulting officer for this premises licence application and the person who submitted the representation on behalf of the Licensing Authority.

While I appreciate your agreement to the conditions outlined in my representation, it's important to note that these were proposed for consideration by the Licensing Sub-Committee, should they be minded to grant the application and wish to impose such conditions. As such, I don't believe there are any amendments to the application that would alter the Licensing Authority's position, and I would maintain that the representation is upheld.

As outlined in the summary of my representation, the Council's Statement of Licensing Policy (page 52) states that any new premises licence application within a Cumulative Impact Zone (CIZ) will be refused (or at least receive representations) — unless the applicant can provide compelling evidence that the proposed licensable activities will not contribute to the cumulative impact in the local area. Therefore, acting on behlaf of the Licensing Authority, I am of the view that granting this application would contribute to the issues the CIZ seeks to address, thereby undermining the licensing objective of the prevention of crime and disorder.

If you have any further questions, please don't hesitate to get in touch.

Many thanks,

Edwin Maldoom
Licensing Enforcement Officer
Regulatory Services
Brent Council

From: Sai Archi <

Sent: 28 August 2025 12:38

To: Business Licence

Subject: Fw: CONSULT: New Premises - Sangit Express, 327 Harrow Road, HA9 6BA -

35660

Hi Sima

As requested the applicant is ready to accept all the conditions from any Brent Licensing Authorities and kindly request to withdraw there representations.

Since all the conditions are been accepted we request to Grant the New Premises Licence at the earliest.

Licensing Authority's Proposed Conditions for Licensing Sub-Committee

The prevention of crime and disorder

- 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. The CCTV system shall also display the correct date and time on any recordings.
- 2.The CCTV system shall capture clear images of every person entering or leaving the premises with further CCTV cameras covering the publicly accessible areas stipulated on the premises plan, including the front external area.
- 3.CCTV footage shall be made available for immediate viewing upon request by the Police and any authorised Officers from Brent Council by a member of staff who is conversant with the operation of the CCTV system. CCTV footage shall also be provided to the Police and any authorised Officers from Brent Council, in a readily accessible format on removable media (I.e., USB, hard drive, CD etc..) or via digital transfer within 24 hours of request.
- 4.A notice stating that CCTV is in operation shall be clearly and prominently displayed.
- 5.An up-to-date incident log shall be kept and maintained at the premises which shall record the following:

a.any incidents of crime and 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.

Any entries into the log shall be made within 12 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. The incident log shall be available for inspection upon request by an authorised officer of Brent Council or the Police

6.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.

7.Staff training shall be undertaken by all members of staff involved in licensable activities. All staff shall also undergo refresher training at least once every 12 months, with all training recorded. Training shall include the following topics:

a.age verification policy and prevention of proxy sales.

b.recognising signs of drunkenness, intoxication, and identifying habitual street drinkers. c.procedures for recording refused sales relating to (a) or (b), and conflict management. d.the four licensing objectives.

e.operating procedures, permitted hours, and premises licence conditions.

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. A copy of staff training shall be available upon request by Police and authorised officers from Brent Council.

8.A register shall be kept recording all refused sales of alcohol. The register 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

- 9. The DPS shall produce a written list of all staff members who are trained and authorised to sell alcohol on behalf of the DPS. This list shall have the staff members name, the signature of the staff member and the authorisation date.
- 10. There shall be no self-service of spirits on the premises with all spirits being located behind counter.

- 11. There shall be no sales of beers, ales, lagers, or ciders above 6.0% ABV.
- 12. There shall be no sales of any single cans or bottles of beer, or cider. A notice advising customers of this policy shall be displayed.
- 13. There shall be no sales of any spirit miniatures under 5cl or wine under 200ml. A notice advising customers of this policy shall be displayed at the point of sale.
- 14.A personal licence holder shall be at the premises at all times whilst open for licensable activities.
- 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.

Public safety

16.All entry and exit points (including fire exits) shall be free from any obstructions.

The prevention of public nuisance

17.Clear and legible notices shall be prominently displayed requesting patrons to respect the needs of residents when leaving the premises.

The protection of children form harm

- 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. A Challenge 25 notice shall be also conspicuously displayed at the point of sale.
- 19. Notices shall be conspicuously displayed at the point of sale reminding customers that proxy sales are unlawful.

We have all the preventive measures in place at the premises and would request all the Licensing officers to visit the premises and see Clear design outlet with a neat tidy and clean retail shop in the wembley triangle area.

The premises has 24X7 CCTV within and outside the premises with 18 CCTV cameras as shown on the plan submitted

The premises will have a refusal logbook on site

All the staff will be given training as per the Home office guidelines

Age verification Notices will be displayed at the till and within the premises

All the Accident and Incident book will be at the premises.

Operating hours will be 09:00- 23:00 hrs daily

With all the above in place all the 4 Main objectives of the licensing act 2003 are mitigated and achieved on the site

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

We kindly request you to grant the New Premsies Licence with Conditions for Sangit Express, 327 Harrow Road, HA9 6BA

Thanks &

Regards

RAJ

SAI ARCHITECTS & ASSOCIATES - CONSULTANTS - CHARTERED

SPACE ARCHITECTURE & INTERIORS

(LABC PARTNER WITH BRENT BLDG CONTROL)

RAJ JAGTAP - Principal Architect

From: swati thakkar

To: Sai Archi

Sent: Thursday 28 August 2025 at 12:15:11 BST

Subject: Re: CONSULT: New Premises - Sangit Express, 327 Harrow Road, HA9 6BA -

35660

Dear sirs

We are ready to accept all the conditions from the Brent Licensing Officers. Kindly with draw any representation and would request you all to visit our premises to see in person all the conditions are in place and will be addressed at all times.

Yours sincerely

SWATIBEN J THAKKAR

DPS



From: Sai Archi

Sent: 23 August 2025 16:26

To: Phil.S.Graves **Cc:** Business Licence

Subject: Re: New Premises - Sangit Express, 327 Harrow Road, HA9 6BA - 35660 - Police

Reps

Dear Phil

Thank you for your reply.

We await for your representation. The applicant is ready to work with the Licensing Authority and address, accept all the representation if any from any of the Licensing departments.

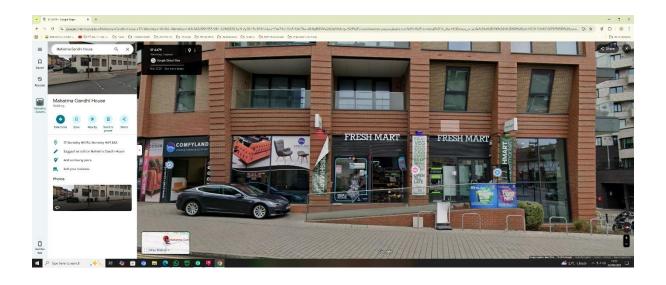
We would like to know what has not been addressed in our application submitted for a New Premises Licence application (sale of Alcohol off the Premises - 09:00-23:00)

The mandatory conditions put in place by the 2010 order were replaced, from October 2014, by those set out in the Licensing Act 2003 (Mandatory Licensing Conditions) (Amendment) Order 2014 (SI 2014/2440). A "responsible person" must ensure compliance with the mandatory conditions. In relation to licensed premises this means:

- the holder of a premises licence in respect of the premises
- the designated premises supervisor (if any) under such a licence, or
- any individual aged 18 or over who is authorised for the purposes of section 153(4) of the Licensing Act 2003 by such a holder or supervisor

All the above will be inplace under the Licensing Act 2003.

Please find enclosed a most recent retail shop selling all at the premises as seen in there shop front promotions.



We hope all the personal that is on the counter have Personal Licence and right to sale Alcohol at the counter, kindly check.

We will await for your representation. And would address all your concerns as Sangit Express is a newly refrubished shop with all the Home office requirements at the shop permises within and outside the shope.

I have already attended the venue and spoken to staff there.

Could you kinldy visit the premises, Sangir Express, 327 Harrow road, Wembley HA9 6BA. I have just called the applicant and requested to check with the Applicant his staff they say no one as yet visited the premises or meet them in person.

Kindly request you along with the Licensing Officers to meet at the Premises 327 Harrow road, Wembley after the Bank holiday tuesday onwards when you get time.

Thanks &

Regards

RAJ

SAI ARCHITECTS & ASSOCIATES - CONSULTANTS - CHARTERED SPACE ARCHITECTURE & INTERIORS

On Saturday 23 August 2025 at 14:58:32 BST, Phil.S.Graves@met.police.uk wrote:

Raj,

Thanks for the prompt response.

The photos submitted where by one of Brent Cllr's. I believe he is highlighting the issues with street drinking and ASB that already exist in Wembley and that adding another off license will only make matters worse.

I have already attended the venue and spoken to staff there.

As pre the councils own policy on off license sales within CIZ's, (that I don't believe you have addressed in your application) there is an assumption that all new applications will be refused, as per this application.

Thanks,

Phil

From: Sai Archi

Sent: 23 August 2025 14:29

To: Graves Phil S - NW-CU

Cc: business.licence@brent.gov.uk

Subject: Re: New Premises - Sangit Express, 327 Harrow Road, HA9 6BA - 35660 - Police

Reps

Ref: New Premises - Sangit Express, 327 Harrow Road, HA9 6BA - 35660 - Police Reps

Dear Phil

We have submitted a New Premises Licence application, the shop is a retail shop and yes we have in the initial stage of the application submissions requested and accepted to all the conditions for the New Premsies Licence if any. The Sale of ALCOHOL is off the premises from 09:00-23:00hrs and the shop is closed at 23:00hrs.

The attached photograph hvae got nothing to do with Sangit Express application, We have a very strict security CCTV 24X7 with 18 cameras within and outside of the Newly design premises. Which is a clean,neat tidy shop. All the miscreants does not apply to Sangit Express.

We request you to kindly visit the shop before any assumptions.

Lastly like all other shop which have right to earn there living so does the applicant of Sangit Express.

Kindly send us your representation and we will see to that they are all accepted.

Please take in to consideration we have nothing to do with the photographs submitted, we have not done those ASB.

Thanks &

Regards

RA.J

SAI ARCHITECTS & ASSOCIATES - CONSULTANTS - CHARTERED SPACE ARCHITECTURE & INTERIORS (LABC PARTNER WITH BRENT BLDG CONTROL)

On Saturday 23 August 2025 at 13:03:22 BST, <phil.s.graves@met.police.uk> wrote:

Good afternoon Raj.

I believe you are representing Sangit Express with their new premises License. Unfortunately the venue falls within one of Brents CIZ's, so for the reasons stated within police are opposing the application in full.

Please also find an attached e-mail from Cllr Akram who shares our concerns over the granting of this license. The local police team will also be submitting representations against the granting of this license which I shall forward onto you in due course.

Thanks.

Phil

From: Akram, Councillor Ajmal Sent: 31 July 2025 14:05

To: Business Licence

Subject: Re: New Premises Licence Application - 35660 - Wembley Hill

Hi All,

I am writing to formally object to the proposed alcohol license for the premises in question for the following reasons -

Prevention of crime and disorder - Public safety- Prevention of public nuisance.

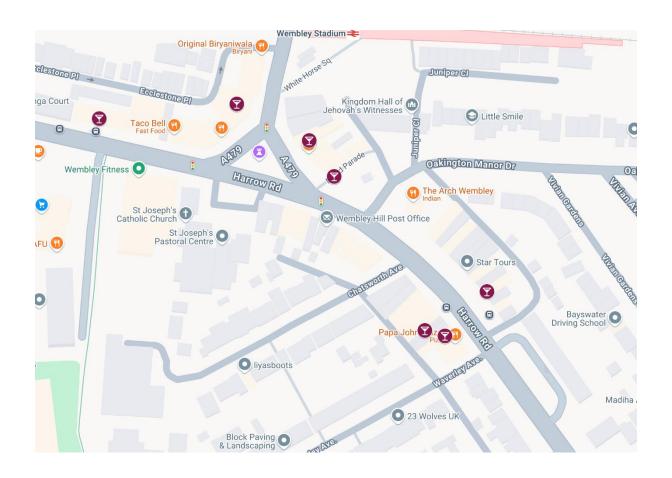
Reasons for Objection:

1. Increase in Anti-Social Behaviour (ASB) and Street Drinking: There has been a noticeable rise in ASB and street drinking in the area, which is already a significant concern for local residents.

The attached images provide evidence of the ongoing issues, particularly around Chatsworth and Waverley, where complaints are regularly raised.

- 2. Saturation of Licensed Premises: Within a 100 metre radius of the proposed site, there are already approximately seven shops selling alcohol, adding another license in such close proximity would only exacerbate the existing problems and contribute to the oversaturation of alcohol availability in the area. A map is attached to illustrate the density of licensed premises nearby.
- 3. Extended Operating Hours: The proposed closing time of 02:00 is far beyond the standard for most off licenses in the area, which typically cease alcohol sales by 23:00, extending trading hours to 2am is likely to lead to increased noise and disruption during late-night hours, further impacting residents quality of life.
- 4. Concerns Regarding the Nature of the Business: The shop in question has only recently opened and is already selling Pan and other items that are raising concerns in the community, the growing prevalence of Pan related litter and associated issues is already noticeable, the addition of an alcohol license would likely worsen the situation.

For these reasons, I strongly urge that this application be reconsidered in the interest of community safety and wellbeing.



	name
1	1 Neeld Parade
2	306 Harrow Rd
3	4 Neeld Parade
4	Inthirans Food & Wine
5	299-303 Harrow Rd
6	11 Wembley Hill Rd
7	297 Harrow Rd

Kind Regards,

Cllr Ajmal Akram

Labour Councillor for Wembley Hill

London Borough of Brent



Working together for a safer London

TERRITORIAL POLICING

Sangit Express Swatiben Thakkar 327, Harrow Road Wembley. HA9 6BA

Your Ref: 35660

Our ref: 01QK/462/24/3122NW

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

Date: Saturday 23rd of August 2025

Police representations to the application for a new Premises Licence for 'Sangit Express, 327, Harrow Road, Wembley HA9 6BA'

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 to add alcohol to the existing convenience store from 09.00 to 02.00 hours seven days a week. The venue sits on the Harrow Road at the junction with Wembley Hill Road which is one of the busiest junctions in this area of Brent. The venue also sits in the shadow of Wembley Stadium along with many other licensed venues.

The location also falls into the Wembley Central Cumulative Impact Zone (CIZ). CIZ's exist across the borough of Brent where crime, ASB, Street Drinking and littering are at their worst. The purpose of these CIZ's is to control the amount of alcohol made available, which is unfortunately the cause of so much of the crime and ASB.

Brent council's policy on CIZ's are detailed in the link below. As you can see the policy details how any new off license application will be refused by the committee unless the application can show that it won't have a negative effect on the licensing objectives and it not just another 'bog standard' off license selling the same alcohol as it's competitors. Having read the application I can see nothing listed detailing how the venue is a speciality off license in anyway, leading me to believe this is a standard off license selling all the normal beers wines and spirits.

Also having read the application I see no reference to the CIZ and how the applicants proposed new off sales would not have a negative impact on the licensing objectives.

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

 $\frac{https://www.brent.gov.uk/nuisance-crime-and-community-safety/public-spaces-protection-orders\#pspos$

"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."

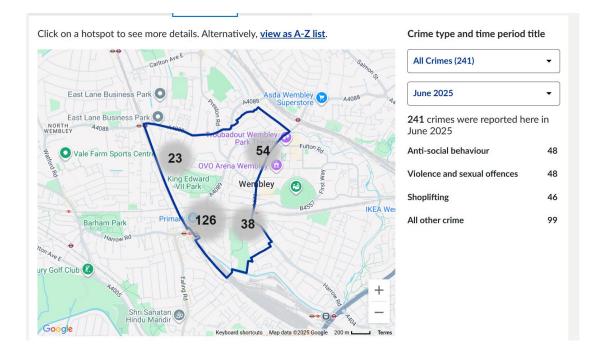
I have also been passed an e-mail from ClIr Akram expressing his concerns over the granting of this premises license. One of the many points raised by ClIr Akram is the number of existing premises license in the immediate vicinity. Below is a list of the licensed 'off sales' as detailed in Brent's Licensing Register.

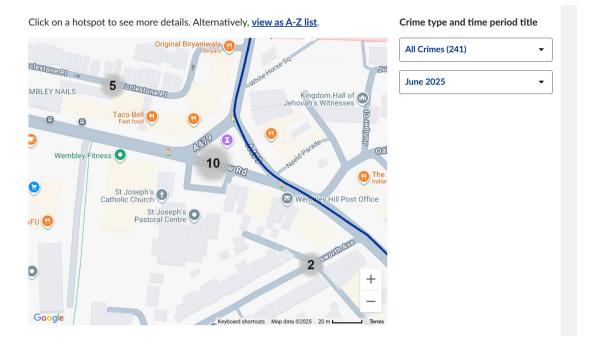
Venue Name	<u>Address</u>	Post Code	Hours of Sale
Wembley Snappy Food & Wine	297, Harrow Road	HA9 6BD	24/7
Triangle Food & Wine	1, Wembley Hill Road	HA9 6QU	08.00 - 00.00
Premier Convenience	4, Wembley Hill Road	HA9 6QU	08.00 - 23.00
Shree Superstore	11, Wembley Hill Road	HA9 8AF	09.00 - 00.00

As you can see there are adequate off licenses literally in eyesight of 327 Harrow Road. Adding another off license to this area will only add to the street drinking, ASB and crime already too high in this area.

Below is a screen shot from the Met Police web site showing the crime figures for this section of the Harrow Road / Wembley Park Road.







The above crime figures show a total of 241 crimes for the month of June 2025. As you can see Antisocial behaviour (ASB) is the top of this list followed by violence and sexual offences. Alchol is a common contributor to both ASB, violence and sexual offences.

In addition to this the venue falls within the footprint of Wembley Stadium. Sporting and music events at the stadium are another massive attraction to the area where alcohol is another source of fuelling crime and ASB. The police along with the local authority spend a vast amount of time and rescources into controlling the street drinkg / PSPO on event days. Adding yet another off license within the Wembley footprint will only encourage more street drinking and add another venue for the police and local authority to monitor.

Summary

The venue is not a specialist in any field and is trying to sell standard beers and wines that are already available in neighbouring off licenses.

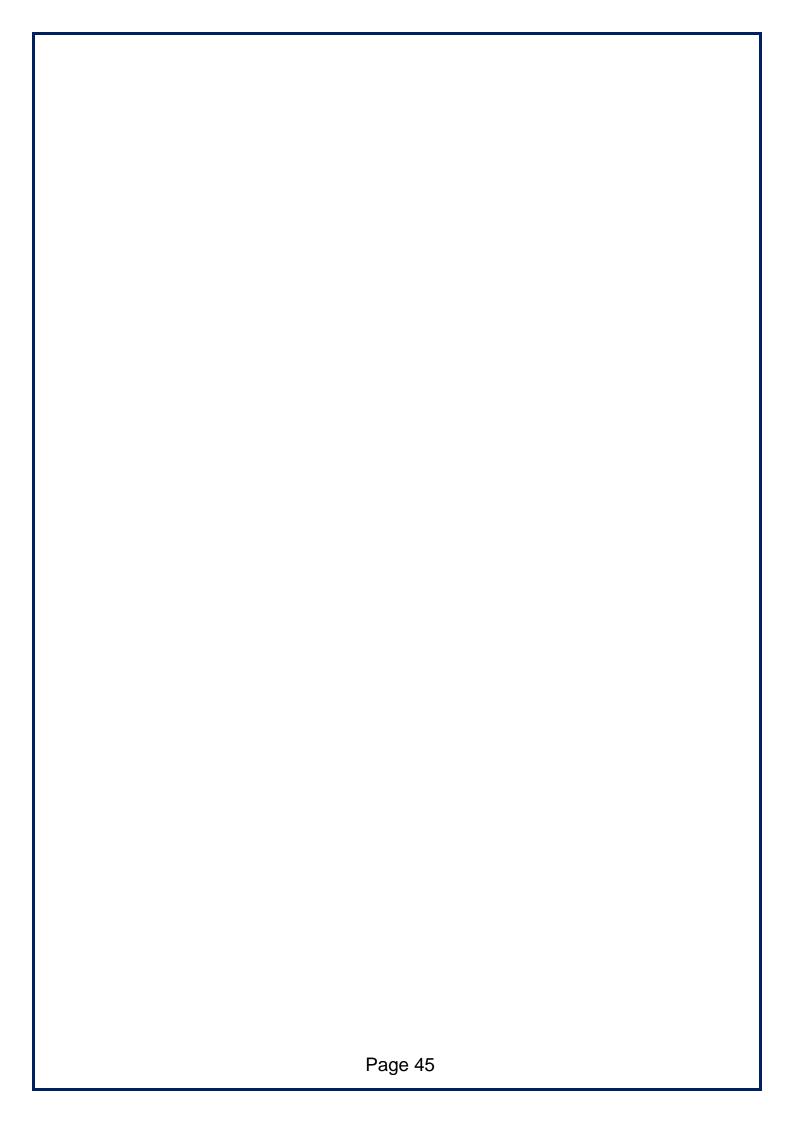
The crime figures and map quoted above speak for themselves. High levels of ASB, public order offenses, violent and sexual crimes all quite often instigated by excessive and continual alcohol use.

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







Witness Signature:



Date: 25/08/2025

WITNESS STATEME	ENT				
Criminal Procedure Rules, r 16. 2; Criminal Justice Act 1967, s. 9; Magistrates' Courts Act 1980, s.5B					
L	URN				
Statement of: PCSO BAKER 7112NW					
Age if under 18: OVER 18 (if over 18 insert 'over 18')	Occupation: PCSO				
This statement (consisting of 1 page(s) each signed by me) is true to I make it knowing that, if it is tendered in evidence, I shall be liable to anything which I know to be false, or do not believe to be true.					

This statement refers to an application being made to Brent council for a supply of alcohol sales license at Sangit Express 327 Harrow Road, Wembley HA9 6BA.

I am one of the dedicated ward officers for Wembley Hill community policing team that covers this area where the application has been made.

There has been a noticeable rise in anti-social behaviour (ASB) and street drinking alcohol in this area, which is already a significant concern for residents. This behaviour affects the following surrounding residential roads HARROW ROAD, CHATSWORTH AVENUE, WAVERLEY AVENUE, JESMOND AVENUE, CLIFTON AVENUE and STANLEY ROAD.

Residents have reported to police on several occasions that groups of males are being rowdy causing a nuisance and annoyance street drinking alcohol, urinating in public, in possession of drug paraphernalia, and littering on the surrounding residential roads during the afternoons and evenings.

Residents have said that they feel unsafe and intimidated walking past these groups of male's street drinking alcohol when entering and leaving their homes. Residents feel this is an unsafe environment to bring their children up in and cannot let their teenage daughters or partners go to the shops on their own due to the unpredictable groups of drunk males loitering outside their properties. Residents also experience noise nuisance from these groups in the early hours of the morning due to their drunken behaviour.

The surrounding roads are heavily littered with empty alcohol cans/bottles and urine in plastic bottles. I have attached one photo below taken on 06/08/2025 on CHATSWORTH AVENUE WEMBLEY.

Witness Signature:

Signature Witnessed by Signature:.....

Continuation of Statement of:

PCSO BAKER 7112NW

This conduct is unreasonable and is having a detrimental effect of a persistent and continuing in nature on the quality of life of those in the immediate locality.

There are already several off-licences in the immediate vicinity selling alcohol of the proposed site. Adding another license in such proximity would only exacerbate the existing problems and contribute to the oversaturation of alcohol availability in the area.

On Tuesday 19/08/2025 I attended CHATSWORTH AVENUE WEMBLEY where one male was seen street drinking alcohol and urinating against a residential property. An ASB warning notice was issued to the subject for this behaviour as method of disposal.

On Saturday 09/08/2025 PCSO PERKINS (7012NW) and I attended CHATSWORTH AVENUE for routine patrols. A group of three males were seen being rowdy street drinking alcohol causing a nuisance and annoyance outside residential properties. Approximately twenty (20) bottles of alcohol were seized and three (3) ASB warning notices were issued as method of disposal. Incident CAD 6664/09AUG25.

On Wednesday 06/08/2025 a resident reported incident CAD 1973/06AUG25 that groups of men were continuing to show up street drinking alcohol and littering the area being rowdy outside residential properties on CHATSWORTH AVENUE WEMBLEY.

On Saturday 26/07/2025 a resident reported incident CAD 6135/26JUL25 that a few males who frequently drink alcohol outside their property on CHATSWORTH AVENUE WEMBLEY have returned and that they feel unsafe entering their property.

Granting this licence would have a negative impact on the public which would likely increase crime and disorder, increase public nuisance, reduce public safety and confidence in the locality.

Litter on Chatsworth Avenue taken on 06/08/2025



Witness Signature:

Of Allho

Signature Witnessed by Signature:.....

Page 2 of 2

From: Akram, Councillor Ajmal < Cllr. Ajmal. Akram@brent.gov.uk >

Sent: 31 July 2025 14:05

To: Business Licence <business.licence@brent.gov.uk>; Afzal, Councillor Ihtesham

<Cllr.Ihtesham.Afzal@brent.gov.uk>; Moeen, Councillor Ishma

<Cllr.Ishma.Moeen@brent.gov.uk>;

Cc:

Subject: Re: New Premises Licence Application - 35660 - Wembley Hill

Hi All,

I am writing to formally object to the proposed alcohol license for the premises in question for the following reasons -

Prevention of crime and disorder - Public safety- Prevention of public nuisance.

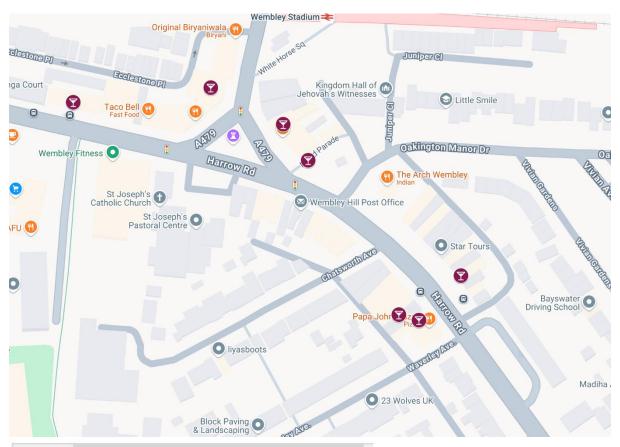
Reasons for Objection:

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significant concern for local residents.

The attached images provide evidence of the ongoing issues, particularly around Chatsworth and Waverley, where complaints are regularly raised.

- Saturation of Licensed Premises: Within a 100 metre radius of the proposed site, there are already approximately seven shops selling alcohol, adding another license in such close proximity would only exacerbate the existing problems and contribute to the oversaturation of alcohol availability in the area. A map is attached to illustrate the density of licensed premises nearby.
- 3. **Extended Operating Hours:** The proposed closing time of 02:00 is far beyond the standard for most off licenses in the area, which typically cease alcohol sales by 23:00, extending trading hours to 2am is likely to lead to increased noise and disruption during late-night hours, further impacting residents quality of life.
- 4. Concerns Regarding the Nature of the Business: The shop in question has only recently opened and is already selling Pan and other items that are raising concerns in the community, the growing prevalence of Pan related litter and associated issues is already noticeable, the addition of an alcohol license would likely worsen the situation.

For these reasons, I strongly urge that this application be reconsidered in the interest of community safety and wellbeing.



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7	297 Harrow Rd

Kind Regards,

Cllr Ajmal Akram

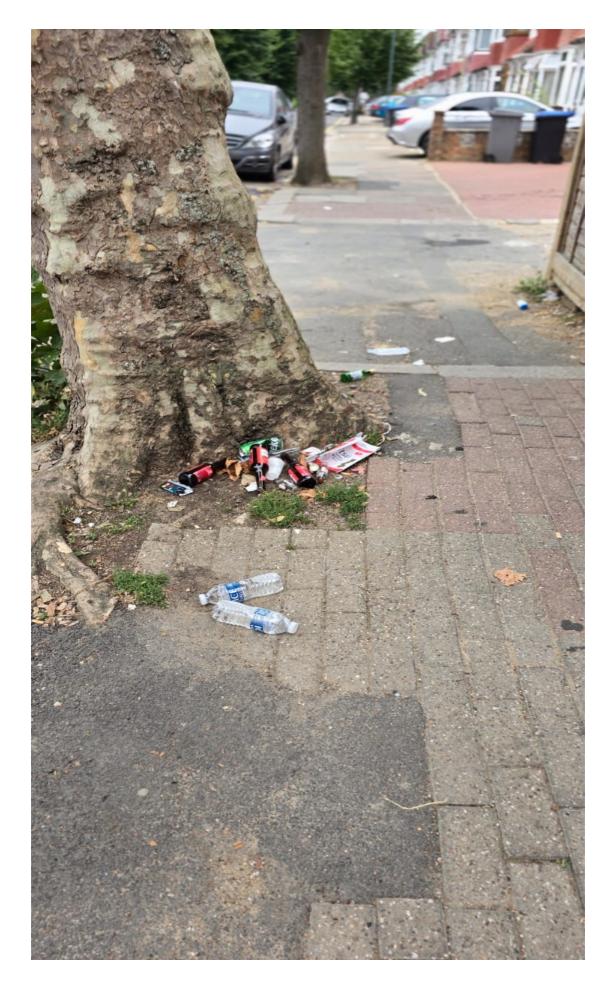
Labour Councillor for Wembley Hill

London Borough of Brent

e: <u>Cllr.Ajmal.Akram@brent.gov.uk</u>

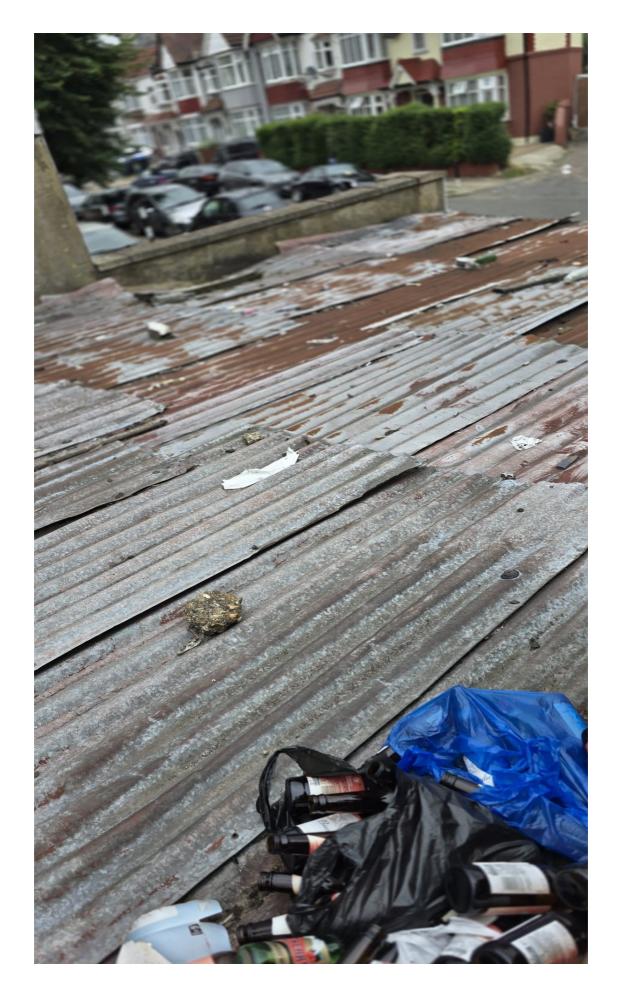
m: <u>07717 700 047</u>





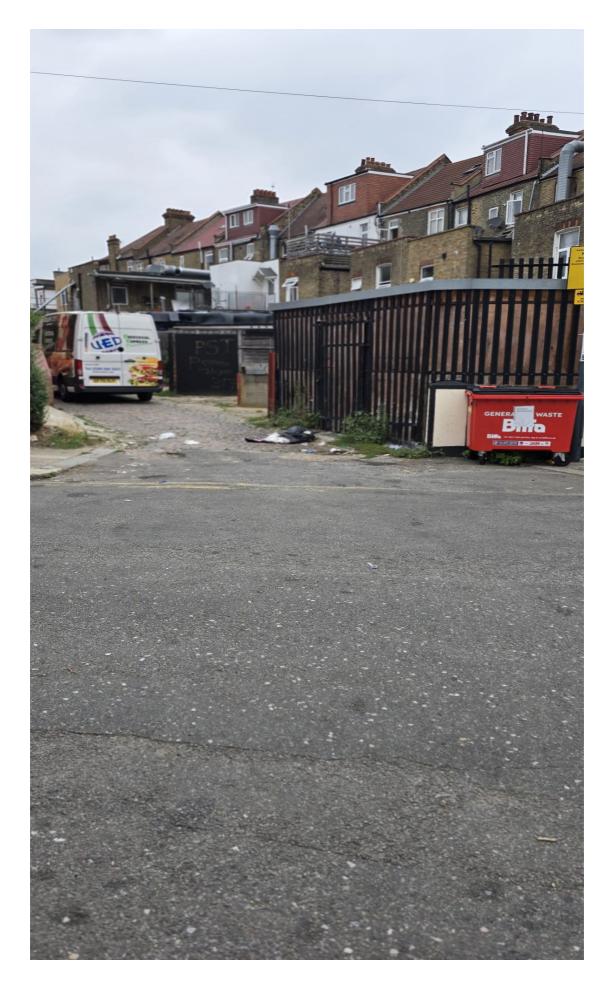
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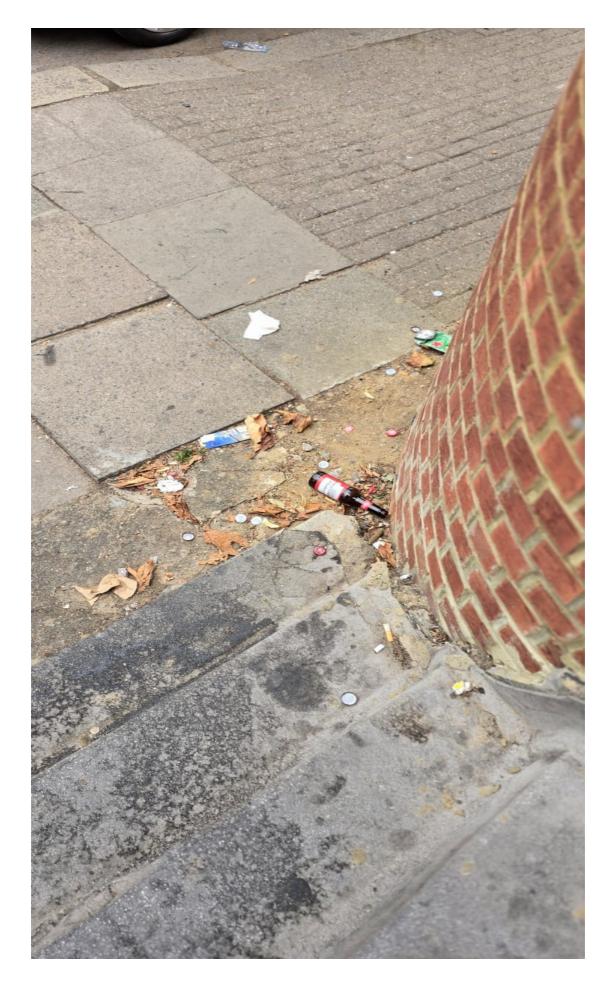
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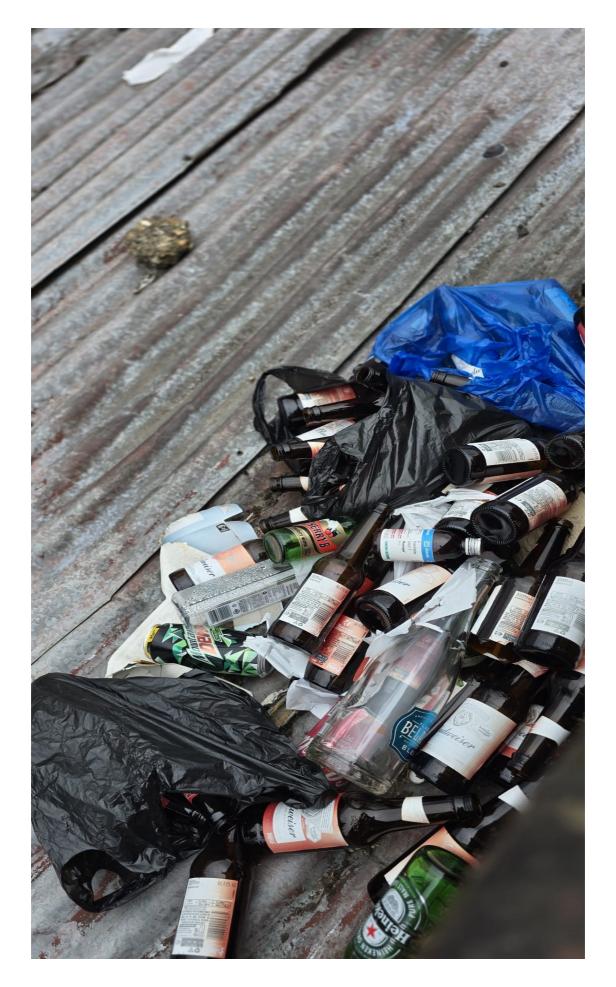
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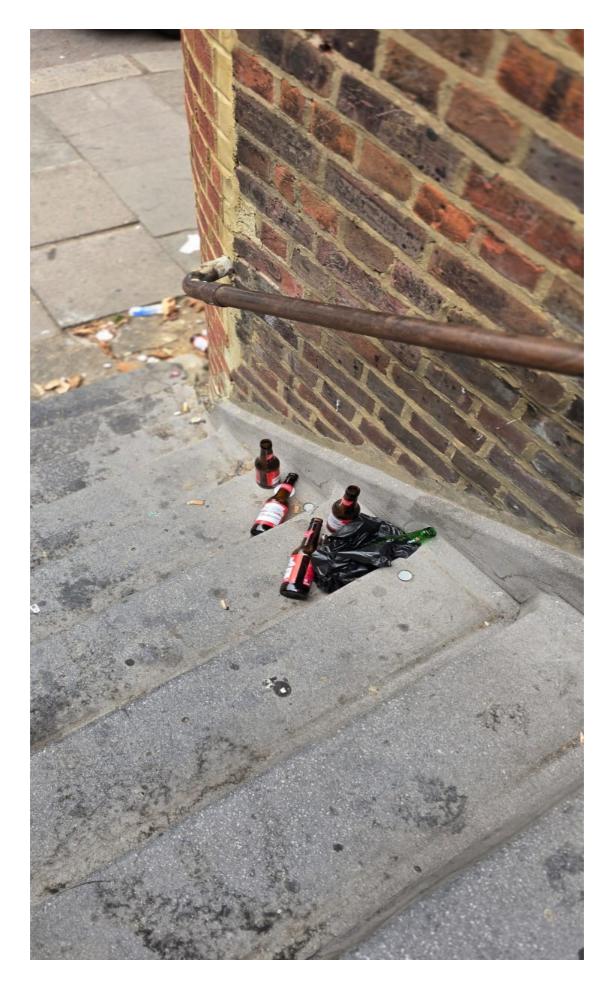
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STATEMENT OF FACT

- I, Mr. Jaydeep Thakkar, residing at 372B Oxleay Court, Alexander Avenue, Rayners Lane, HA2 9UG, sincerely declare the following facts:
 - I have been a resident of the London Borough of Harrow for the past 18 years.
 - 2. The applicant, Mrs. Swatiben Thakkar, is my wife, and I will be assisting her in running this business.
 - 3. I have 5 years of experience working in an off-licence store, which has provided me with the skills and knowledge to manage the sale of alcohol responsibly. Through this experience, I have become fully aware of age verification requirements and licensing hour restrictions, which my wife and I will strictly adhere to.
 - 4. I fully understand that there are genuine concerns raised in relation to this application, particularly regarding alcohol-related anti-social behaviour and street drinking. My wife and I are fully committed to addressing these concerns appropriately.
 - I assure the committee that, we will display a clear notice informing customers that alcohol is sold with discretion, and that all relevant licensing conditions will be strictly followed.
 - My wife has started this business, and I will help her run it diligently and responsibly.
 - 7. This business is very important to her, as she has invested nearly £50,000–£60,000 of her hardearned savings to fulfil her dream of owning and operating her own business.
 - She is fully committed to complying with all legal and licensing obligations to ensure the business operates properly and continues successfully for

years to come, leaving it as a legacy for our children.

9. If the committee does not approve this application, it would cause a serious setback for her as a working woman from an ethnic minority background, as she would struggle to meet expenses and repay the investments made.

Signed: J.B. THAKKAR

Mr. Jaydeep Thakkar

Date: 14/10/2025

CS CamScanner

STATEMENT OF FACT

- I, Mrs. Swatiben Jaydeep Thakkar, residing at 372B Oxleay Court, Alexander Avenue, Rayners Lane, HA2 9UG, sincerely declare the following facts:
 - I have been a resident of the London Borough of Harrow for the past 16 years.
 - I am the applicant, and I will be running this business together with my husband, Jaydeep Thakar, for which he has prepared a separate statement.
 - We will jointly manage this business, ensuring that all necessary precautionary compliance measures are properly followed.
 - 4. I have some years (three) of experience working in off license business environment. From this experience, and with experience of my husband's I am fully confident that I will be able to run this business and comply with the suggested conditions.
 - 5. I fully understand that there are genuine concerns raised in relation to this application, particularly regarding alcohol-related anti-social behaviour and street drinking, and I am fully committed to addressing these concerns appropriately.
 - 6. I assure the committee that I will display a clear notice informing customers that alcohol is sold with discretion, and that all relevant licensing conditions will be strictly adhered to.
 - 7. When I submitted the application, I was not asked anywhere on the form, or otherwise, to address these concerns. If I was given the opportunity earlier, I would have provided the necessary clarifications.
 - 8. I have started this business, and I am working

diligently to operate it successfully and responsibly.

- 9. This business is very important to me, as I have invested all my personal savings approximately £50,000 to £60,000 to establish and sustain it.
- 10. I am fully committed to complying with all legal and licensing obligations to ensure that the business operates properly and continues successfully for years to come, leaving it as a legacy for my children.
- 11. If the committee does not approve this application, it would cause a serious setback to me as a working woman from an ethnic minority background, as I would struggle to meet my expenses and repay the investments made.

Signed: S.J. Theukkar

Mrs. Swatiben Jaydeep Thakkar

Date: 14/10/25