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Alcohol and Entertainment Licensing Sub-Committee

Monday 16 March 2026 at 10.15 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
Councillors:

Long (Chair)
Hylton
L Smith

Substitute Members:
Councillors:

Ahmed, Akram, Chohan, Clinton, Ethapemi, Mahmood, Maurice

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

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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.	
3	**Application for for New Premises Licence by Swatiben Thakkar for the premises known as Sanjit Express, 327 Harrow Road, Wembley, HA9 6BA, pursuant to the provisions of the Licensing Act 2003**	1 - 44

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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:	Mr Panchal - Personal Licence Courses

The application is for a new premises licence as follows:

To provide: the Sale of Alcohol from 9am to 10pm Monday to Sunday and to remain open from 8am 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 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 Rep
C. Licensing Rep
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: 21003
Application No: 37165
Date: 21 January 2026

LICENSING ACT 2003
Licence:Premises Licence New Application
Application No: 37165

Dear Sir/Madam,

Applicant:Mrs SWATIBEN JAYDEEPJUMAR THAKKAR

Date Received: 21 January 2026

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:
18 February 2026.

Yours faithfully

Vanesha Haulkhory
Licensing Support 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: 23,750

Part 2 – Applicant Details

Proposed Licence Holder:
Mrs SWATIBEN JAYDEEPJUMAR THAKKAR
[redacted]

Agent Details

[redacted]
PERSONAL LICENCE COURSES UK LTD
[redacted]

Part 3 – Operating Schedule

When do you want the premises licence to start?

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: Convenience Store and Off Licence

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	09:00	22:00
Tuesday	09:00	22:00
Wednesday	09:00	22:00
Thursday	09:00	22:00
Friday	09:00	22:00
Saturday	09:00	22:00
Sunday	09:00	22:00

NONE

NONE

State the name and details of the individual whom you wish to specify on the licence as designated premises supervisor:
MRS SWATIBEN JAYDEEPKUMAR THAKKAR
Date of birth:
[redacted]

Licence Number: [redacted]
Issuing authority:

Concerns in respect of Children: 1. The licensee shall adopt a 'Challenge 25' policy and promote it through the prominent display of posters. 2. The licensee shall put arrangements in place to ensure that before serving alcohol to persons they believe to be less than 25, staff ask to see accredited proof of age: that is, proof of age cards carrying the 'PASS' logo (and no others), a passport, or UK Driving Licence bearing the photograph and date of birth of the bearer. 3. The licensee shall ensure that staff are trained about age restricted products and ensure that they sign to confirm that they have understood the training. The licensee shall keep records of training and instructions given to staff, detailing the areas covered, and make them available for inspection upon request by the licensing team, police or trading standards. 4. The licensee shall require staff to note any refusals to sell to young people in a refusals log. The refusals log shall be made available for inspection upon request by the licensing team, police or trading standards. 5. A sign stating “No proof of age – No sale” shall be displayed at the point of sale.

The opening hours of the premises

Day	Start Time	End Time
Monday	08:00	23:00
Tuesday	08:00	23:00
Wednesday	08:00	23:00
Thursday	08:00	23:00
Friday	08:00	23:00
Saturday	08:00	23:00
Sunday	08:00	22:00

NONE

a) General – all four licensing objectives (b, c, d, e): 1. Strict implementation of challenge 25 policy 2. CCTV to be installed and 31 days recoding system 3. All staff to be trained in responsible alcohol retailing

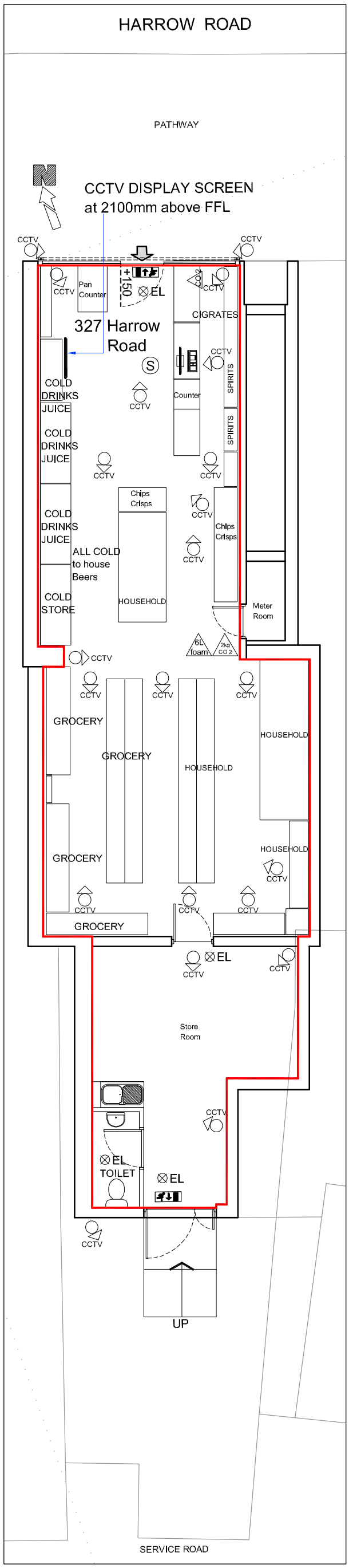
b) The prevention of crime and disorder: 1. CCTV shall be installed, operated, and maintained, at all times that the premises is open for licensable activities, so as to comply with the following criteria: a) The licensee will ensure that the system is checked every two weeks to ensure that the system is working properly and that the date and time are correct. A record of these checks, showing the date and name of the person checking, shall be kept and made available to Police or authorised Council officers on request; b) The Police must be informed if the system will not be operating for longer than one day of business for any reason; c) One camera will show a close-up of the entrance to the premises, to capture a clear, full length image of anyone entering; d) The system will provide full coverage of the interior of the premises and any exterior part of the premises accessible to the public; e) The system shall record in real time and recordings will be date and time stamped; f) Recordings will be kept for a minimum of 31 days and downloaded footage will be provided free of charge to Police or authorised Council officers on request (subject to the Data Protection Act 1998) within 24 hours of any request; and g) At all times, there will be a person on the premises who can operate the system sufficiently to allow Police or authorised Council officers to view footage on request and to supply a copy of footage immediately to Police to assist with the immediate investigation of an offence. 2. In the event that an assault is committed on the premises (or appears to have been committed) the management will immediately ensure that: a) The police (and, where appropriate, the London Ambulance Service) are called without delay; b) All measures that are reasonably practicable are taken to apprehend any suspects pending the arrival of the police; c) The crime scene is preserved so as to enable a full forensic investigation to be carried out by the police; and d) Such other measures are taken (as appropriate) to fully protect the safety of all persons present on the premises. 3. An incident log shall be kept at the premises, and made available on request to the police or an authorised officer, which will record the following: a) All crimes reported to the venue; b) Any complaints received; c) Any incidents of disorder; d) Any faults in the CCTV system; e) Any visit by a relevant authority or emergency service; f) All ejections of patrons; g) All seizures of drugs or offensive weapons; and h) Any refusal of the sale of alcohol. 4. Alcohol shall not be sold in an open container or be consumed in the licensed premises. 5. No alcoholic goods will ever be purchased or taken from persons calling at the shop 6. No spirits shall be purchased in a resealed box. 7. The licensee will immediately report to Trading Standards any instances of a caller to the shop attempting to sell alcohol. 8. Invoices (or copies) for all alcoholic goods will be made available to officers from the council, police or HMRC upon request, in a week once received from licensee accountant. 9. A stock control system will be introduced so that the licensee can quickly identify where and when alcoholic goods have been purchased. 10. An ultra-violet light will be available at the premises for the purpose of checking the UK Duty Stamp on spirits as soon as practical after they have been purchased. 11. If any spirits bought by the company have UK Duty Stamps that do not fluoresce under ultra-violet light, or are otherwise suspicious, the licensee shall identify the supplier to Brent Trading Standards and HMRC as soon as possible. 12. No high strength beer, lager, or cider of 5.5 % abv or above shall be sold other than premium beer, lager or cider. 13. No single cans are permitted to be sold at the premises. 14. A Personal Licence Holder (PLH) to be on the premises at all times. 15. Staff training must be documented and based on legislation and operating procedures. All training shall be signed and dated, and a copy of such records will be available for inspection by Police and local authority enforcement officers. 16. All staff employed at the

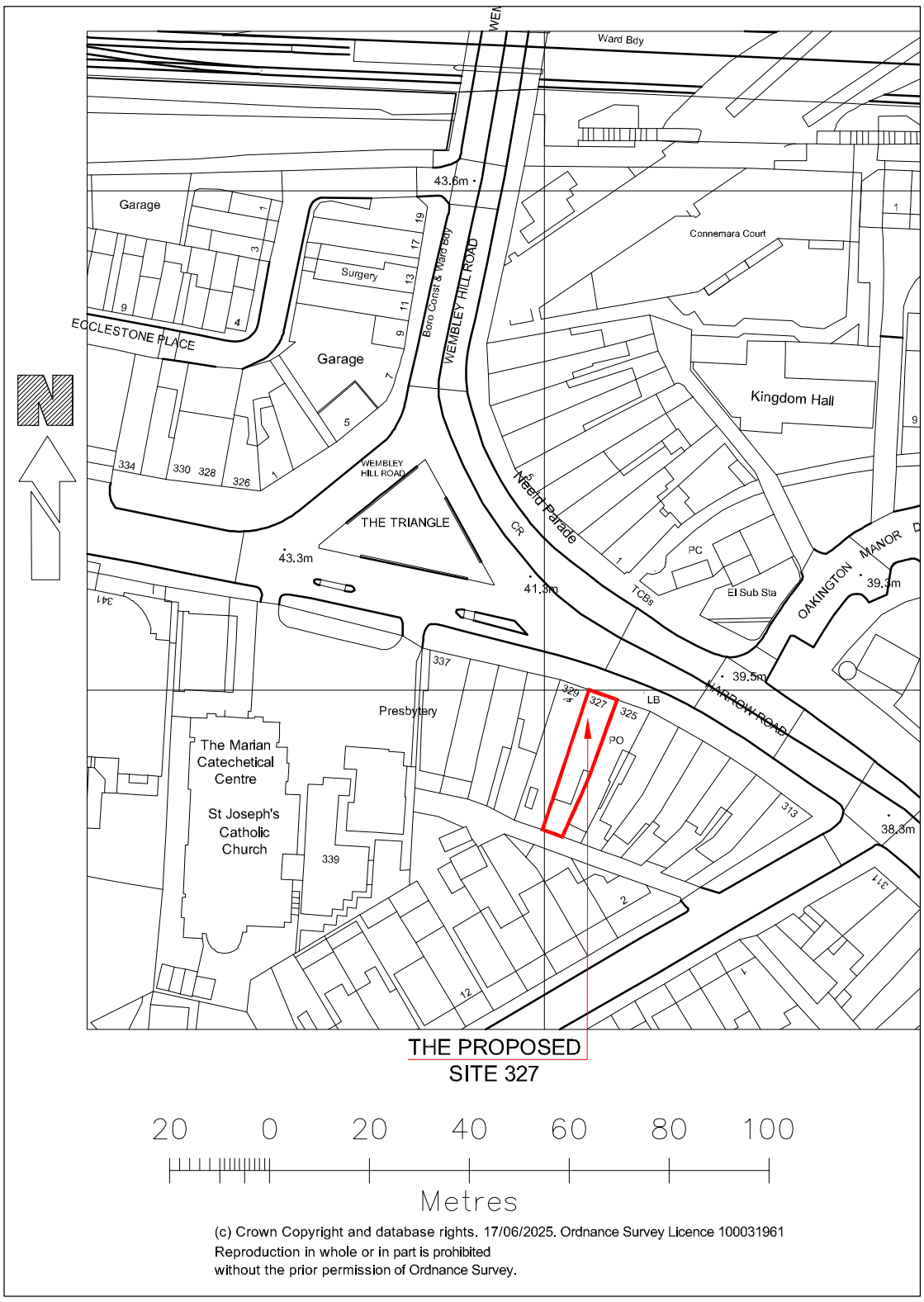
premises will have UK right to work status checked, once passed that stage they shall be offered employment. 17. All products to be paid for in full at the point of sale. No 'credit' to be offered to any customers. 18. A suitable intruder alarm complete with panic button shall be fitted and maintained. 19. No miniatures below 10cl to be sold at the premises.

c) Public safety: 1. Installation of appropriate safety equipment 2. Fire exit signs displayed 3. CCTV working at all times

d) The prevention of public nuisance: 1. Notice displayed asking customers to leave quietly from premises also customers will be told in person to leave quietly and not to disturb the local neighbourhood 2. Strict policy in place to tell all staff not to serve alcohol to drunks at all 3. Appropriate signage will be displayed, in prominent position informing customers they are being recorded on CCTV

e) The protection of children from harm: 1. The licensee shall adopt a 'Challenge 25' policy and promote it through the prominent display of posters. 2. The licensee shall put arrangements in place to ensure that before serving alcohol to persons they believe to be less than 25, staff ask to see accredited proof of age: that is, proof of age cards carrying the 'PASS' logo (and no others), a passport, or UK Driving Licence bearing the photograph and date of birth of the bearer. 3. The licensee shall ensure that staff are trained about age restricted products and ensure that they sign to confirm that they have understood the training. The licensee shall keep records of training and instructions given to staff, detailing the areas covered, and make them available for inspection upon request by the licensing team, police or trading standards. 4. The licensee shall require staff to note any refusals to sell to young people in a refusals log. The refusals log shall be made available for inspection upon request by the licensing team, police or trading standards. 5. A sign stating “No proof of age – No sale” shall be displayed at the point of sale.





SITE PLAN

SCALE 1:1250 @ A3

(S)	Smoke Detectors underneath the structural existing slab
foam	Fire exitinguisher 6 Litre AFFF Foam spray
CO 2	Fire exitinguisher C0 2
CCTV	Closed Circuit Television camera
EL	Emergency Lighting
	Licensable Activities

A3

PROPOSED GROUND FLOOR PLAN

SCALE 1:100 @A3

0 1 2 3 4m 5m

PREMISES LICENCE APPLICATION

NOTES:

Figured dimensions are to be used in preference to scaled dimensions.

Contractors to verify all dimensions on site before commencing any work or shop 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 - Consultants and / or contract administrator immediately.
This drawing is to be read in conjuction with other issued project documentation and drawings.

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.

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 ©.

REVISIONS:

S A I ARCHITECTS & ASSOCIATES-CONSULTANTS
62, Crownwalk, Wembley, Middlesex,London HA9 8HU
Tel 07961 743174 E:salarchi@yahoo.com

PROJECT NO.	25/PL-06/PL	DRAWN BY	RJ
DRAWING NO.	25/310/PL	DATE	23/07/25
SCALE	1:100	REV.	*

RIBA (Stage-A) from Inception to (L)-Occupation

TITLE/VIEW	Proposed Ground Floor Plan
PROJECT	Planning- New Premises Licence
LOCATION	SANGIT EXPRESS, 327 Harrow road, Wembley, Middlesex, Brent London HA9 6BA

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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

10 February 2026

Ref: 37165

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 seeks to permit the supply of alcohol for consumption off the premises between 09:00 and 22:00, Monday to Sunday.

It is acknowledged that the applicant has proposed a range of conditions aimed at promoting the four licensing objectives. These include:

- An age verification policy
- Recorded staff training
- Maintenance of a refusals log

- Robust CCTV provisions
- Maintenance of an incident log
- Restriction on beer, lager, or cider above 5.5% ABV
- Restriction on the sales of alcoholic miniatures
- Restriction on sales of single can/bottle sales of beer and cider
- A personal licence holder being present at all times

However, the operating schedule also puts forward several other conditions that seem inconsistent, generic, or inappropriate for the type of licensable activities proposed. A few examples are provided below for reference, though this list is not exhaustive:

"In the event that an assault is committed on the premises (or appears to have been committed) the management will immediately ensure that:
b) All measures that are reasonably practicable are taken to apprehend any suspects pending the arrival of the police;" – While the intention is positive, this condition is more suited to pubs, bars, or nightclubs. It is neither realistic nor appropriate for shop staff, who are not SIA-licenced, to attempt to apprehend suspects.

"Alcohol shall not be sold in an open container or be consumed in the licensed premises."- As the application seeks off-sales only, allowing on-site consumption would already be an offence under Section 136 of the Act.

"No alcoholic goods will ever be purchased or taken from persons calling at the shop."- This is already a legal requirement; it is an offence to buy alcoholic products for resale from unregistered UK wholesalers.

"All seizures of drugs or offensive weapons"- There is no justification as to why an off-licence would implement a policy to search for drugs or offensive weapons from customers entering the premises.

"Strict policy in place to tell all staff not to serve alcohol to drunks at all" – Staff shouldn't be selling alcohol to intoxicated persons anyway and it's an offence to do so pursuant to Section 141 of the Act.

Some of the proposed conditions represent good practice for an off-licence (i.e., CCTV provisions, an age-verification policy, an incident/refusals log, etc.). In addition, the other more restrictive measures put forward (i.e., restrictions on beers/ciders above 5.5% ABV, the prevention of alcoholic miniature sales, restrictions on single can/bottle sales, and the requirement for a personal licence holder to be present at all times) suggest that the applicant has considered some of the minimum expectations for premises located within a Cumulative Impact Zone (CIZ).

However, several other conditions appear questionable for an off-licence premises. Consequently, these unsuitable measures somewhat undermine the value of the rest of the operating schedule and suggest that the applicant has not fully considered, in detail, certain risks associated with selling alcohol in this challenging location.

Furthermore, the application makes no specific reference to the CIZ despite the premises being located within one. An applicant seeking a premises licence in a designated CIZ would be expected to acknowledge this and provide detailed information explaining how the proposed application would avoid contributing to cumulative impact in the area and would not exacerbate the issues the CIZ was established to address. As such, the absence of any such consideration, either within the application or in any supporting document is a significant omission.

Informative

On 31 July 2025, the Licensing Authority received a premises licence application for Sangit Express, 327 Harrow Road, HA9 6BA, submitted by Swatiben Jaydeepjumar Thakkar in an individual capacity as an applicant.

As the premises lies within a Cumulative Impact Zone, both the Metropolitan Police Service and the Licensing Authority submitted representations against the premises licence application, in line with Brent Council's Statement of Licensing Policy.

A Licensing Sub-Committee hearing took place on 15 October 2025, and consequently the application was refused. The Licensing Sub-Committee cited the following reasons for refusal within its decision notice:

"The sub-committee expressed a number of concerns regarding the application, as well as the supporting evidence and information provided during the hearing, including the following:

The applicant did not provide a substantive response regarding her approach to addressing potential challenges associated with operating a business in a CIZ, an area known for street drinking and documented incidents of anti-social behaviour.

The applicant demonstrates a limited understanding of off-licence operations and the associated processes; for example, she equated tasks such as till operation and shelf stocking with managing an off-licence. Additionally, it appears that the applicant did not observe that her application contained several irrelevant conditions.

The sub-committee also concluded that the signed statements submitted regarding the applicant and her husband's experience in working in or around the off-licence business were misleading.

The applicant has not provided evidence that she or any other individual employed by the business possesses the requisite experience necessary to operate an alcohol-selling establishment within a CIZ.

The sub-committee further observed that four additional nearby businesses are involved in the sale of alcohol. Police evidence substantiates the occurrence of street drinking and significant littering involving alcohol bottles in the vicinity.

The sub-committee noted that the licensed premises is in a CIZ, where expanding alcohol sales is generally not approved. Applicants must show that their proposed licence would not harm/ negatively impact the licensing objectives. The sub-committee determined that the applicant had not submitted sufficient evidence to support their case. In particular, the application did not provide adequate detail regarding how the licence holder intended to proactively address the concerns raiseSd by both the licensing Police and the licensing authority."

[Annex A – Initial Premises Licence Application 31.07.2025]
[Annex B – Licensing Authority's Representation 28.06.2025]
[Annex C – Licensing Sub-Committee's Decision Notice 15.10.2025]

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

<u>Wembley Central (Wembley High Road / North End of Ealing Road)</u>

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:
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

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

This is an entirely new premises licence application and therefore it should be judged on its own merits, based on the information provided within the operating schedule. However, the previous application submitted by Swatiben Jaydeepkumar Thakkar, and the Licensing Sub-Committee's subsequent refusal, remains a relevant consideration, particularly given that the applicant is the same individual.

The Licensing Authority acknowledges that the Licensing Act 2003 does not prevent the submission of a new application following a previous refusal. Nonethless, the circumstances and reasoning behind the initial refusal on 15 October 2025 should remain a material consideration for the Licensing Sub-Committee in determining this application.

It is noted that the current application proposes more robust conditions and reduced hours of licensable activity compared with the previous application. However, the Licensing Authority questions whether the sale of alcohol would be ancillary to the business model, particularly given that this is the second application submitted by the same applicant within the last seven months. Furthermore, the proposed application does not appear to reflect any niche or specialist retail model and instead presents as an alcohol-led off-licence.

Brent Council's Statement of Licensing Policy makes it clear that any new premises licence application that falls within a designated Cumulative Impact Zone will not be granted unless the applicant provides compelling evidence that the proposed licensable activities will not contribute to cumulative impact of the local area and won't increase alcohol-related anti-social behaviour or localised street drinking.

While this application might ordinarily be granted without issue outside of a CIZ, it is the view of the Licensing Authority that no compelling evidence has yet been presented to demonstrate that granting it would not add to the cumulative impact in the area nor is it felt that there is sufficient justification to department from the CIZ / Statement of Licensing Policy.

As such, the Licensing Authority submits this representation to engage the discretion of the Licensing Sub-Committee and respectfully reminds the Sub-Committee to remain mindful of the

Council's position on new premises licence applications within a CIZ, as outlined in the Statement of Licensing Policy, as well as the reasons for the refusal of the previous application.

The Licensing Authority's view is that the application should be refused. However, should the Sub-Committee be minded to grant the application on the basis that sufficient evidence is provided to demonstrate that it would not add to the cumulative impact on the local area, thereby giving enough justification to depart from the policy, it is respectfully requested that the conditions set out at the rear of this representation, which are largely consistent with those proposed by the applicant, be imposed in full.

Yours sincerely,

E. Maldoom

Edwin Maldoom
Licensing Enforcement Officer

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 5.5% 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.

<u>Public safety</u>

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

<u>The prevention of public nuisance</u>

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

<u>The protection of children form harm</u>

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.

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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
[redacted]

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 premises		
Day	Start Time	End 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:
[redacted]

Licence Number: [redacted]
Issuing authority: [redacted]

Concerns in respect of Children: As per attached letter

The opening hours of the premises

Day	Start Time	End Time
Monday	08:00	02:00
Tuesday	08:00	02:00
Wednesday	08:00	02:00
Thursday	08:00	02:00
Friday	08:00	02:00
Saturday	08:00	02:00
Sunday	08:00	02:00

a) General - all four licensing objectives (b, c, d, e): 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 -02:00pm (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 Premise 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. All premises licensing objectives are achievable in spite of proposed opening hours on all the week days and all EVENT days at Wembley for the Sangit express Premises at 327 Harrow road, Wembley, HA9 6BA. 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 patrons, 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 bar 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. Develop a clear code of conduct: Establishing a clear code of conduct for buyers can help prevent disorderly behaviour and give security personnel clear guidelines for when intervention is necessary.

b) The prevention of crime and disorder: Provision of effective CCTV in and around premises 24hrs/30 days recording 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. Effective & responsible management on the premises. Training& supervision of staff 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. Adoption of best practice guidance. 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. Ensure that your staffs understand that as part of our routine security measures their belongings ARE/will be subject to random inspections. Take great care to check the references of any new staff when employed.

c) Public safety: Suitable & sufficient risk assessment's in place. Easy means of escape on site/premises Appropriate fire safety devices easily accessible in case of fire (Fire extinguishers) Regular testing of safety appliance's done (and certification's) at the premises. Comprehensive fire risk assessments, including occupancy, consideration whenever building or operational alterations are carried out at the premises. Installation of appropriate and adequate safety equipment, warning systems, emergency lighting and evacuation procedures. Easy access for emergency vehicles, and is free of obstructions at all times. 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.

d) The prevention of public nuisance: Control of noise Self manually operated closing main door, adequate false ceiling to concrete 1st floor slab buffer prevents any noise. Keeping doors and windows closed, especially during event

takes place indoors. 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 Easy public transport from 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.

e) 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! 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 all ready in place and SHALL be practised as per the good practice guidance till 02:00hrs after midnight 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.

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

- 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.

<u>Cumulative Impact Zone (CIZ)</u>

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 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:

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

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

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.

<u>Public safety</u>

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

<u>The prevention of public nuisance</u>

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

<u>The protection of children form harm</u>

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.

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London Borough of Brent

Decision of the Alcohol and Entertainment Licensing Sub-Committee following a hearing on 15 October 2025

NOTICE OF DECISION

PREMISES

Sanjit Express,
327 Harrow Road,
Wembley, HA9 6BA

1. Members of the Sub-Committee

Councillors Ahmed (Chair), Hylton and Clinton

2. The Application

The application is for a new premises licence to provide: the Sale of Alcohol and to remain open from 9am to 11pm Monday to Sunday.

3. Background and the presumption applicable to Cumulative Impact Zones ("CIZ" s) within the borough

This application falls within a CIZ within the borough**.**

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.

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.

This Notice is not and does not purport to be a verbatim record of the hearing.

4. Representation

Applicant
The Applicant was represented by:

- Applicant: Mrs Swatiben Thakkar
- Solicitor: Mr Zeeshan Mian

Objector

- PC Phil Graves
- Rhea Vagarwal (Licensing Authority)

5. The Hearing

Cllr Ahmed opened the meeting, and all attendees introduced themselves. Declarations of interests were dealt with, and Ms. Legister introduced the application.

Submissions made on behalf of the Police

PC Graves opposed the application on a number of grounds.

The premises is located on one of the busiest parts of the borough within a CIZ.

PC Graves reminded the sub-committee that within a CIZ, there is a presumption of refusal for applications unless the applicant can demonstrate that the proposed licensable activity will not adversely affect the licensing objectives—particularly those factors that resulted in the area's designation as a CIZ.

The area is problematic and rife with antisocial behaviour and has a high crime rate.

The types of offences reported in the area include (a) antisocial behaviour, (b) violence and sexual offences, (c) shoplifting, and (d) theft. Additionally, not all incidents are documented.

PC Graves presented photographs of the area to the sub-committee in support of the Police's objection. The images demonstrate that there is an existing significant issue with littering and street drinking within the triangle where the applicant's business is situated.

In addition, the venue is located within the area of Wembley Stadium. Sporting and music events at the stadium draw significant crowds to the area, where alcohol consumption has been linked to incidents of crime and antisocial behaviour.

The police and local authorities allocate considerable time and resources to managing street drinking and enforcing Public Spaces Protection Orders (PSPO) on event days. The introduction of another off-licence within the Wembley area may increase street drinking and require additional monitoring by police and local authorities.

There are four other off-licences nearby, and there is no substantial evidence that the Applicant intends to sell types of alcohol different from those offered by the existing four businesses.

PC Graves noted that the application in question did not explicitly address the business's location within a CIZ, nor did it outline any measures intended to address the presumption associated with a CIZ designation.

The supplementary evidence provided by the applicant prompted additional questions from the Police. PC Graves noted that the content appeared to be assembled from various sources. Several of the conditions mentioned in the supplied evidence did not appear relevant to the venue, referencing restaurants rather than an off-licence, with conditions such as crowd control, managing odours, and keeping doors closed, none of which applied to this type of establishment.

According to the Police, there was insufficient consideration given when the application was submitted, which raises concerns about the applicant's preparedness and competence regarding the proposed business.

The Police stated that permitting the application, regardless of any conditions imposed, could result in increased alcohol availability, street drinking, antisocial behaviour, and crime in the area. Therefore, they recommended that the application be refused.

In answer to questions from Councillors and the Applicant's Solicitor, PC Graves gave the following responses**:**

- An increase in the number of licences permitting alcohol sales in a given area may result in reduced alcohol prices due to heightened business competition. This could potentially attract a larger customer base, which in turn may lead to an increase in street drinking and related antisocial behaviour.

- Any increase in the number of street drinkers may require additional attention from police and licensing officers. On event days, this could result in increased responsibility for both the Police and the licensing authority.

- The quantity of bottles discarded by street drinkers in the area currently has a cumulative effect that is comparable to fly-tipping.

Submissions made by Ms R Vagarwal on behalf of the Licensing Authority

Ms Vagarwal clearly stated at the outset that she would be seeking refusal of the application. She reminded the sub-committee that the Council's Statement of Licensing Policy specifies that any new premises licence application within a designated Cumulative Impact Zone (CIZ) will not be granted unless there is compelling evidence demonstrating that the proposal will not contribute to cumulative impact in the local area, particularly regarding alcohol-related anti-social behaviour and street drinking.

In this case, no supporting evidence has been presented. Additionally, the application does not acknowledge the CIZ or propose any substantive measures to address the concerns that led to its establishment. Furthermore, several of the proposed conditions are either irrelevant, insufficiently defined, or appear to have been adapted from applications pertaining to other types of premises.

If there is no sufficient evidence to support a departure from the Statement of Licensing Policy, the Licensing Authority recommends that the application be refused.

If the sub-committee concludes that adequate evidence exists to justify a departure from the Statement of Licensing Policy and determines that the application would not contribute to cumulative impact, the Licensing Authority requests that the conditions outlined in its representation are imposed.

In answer to questions from Councillors and the Applicant's agent, Ms R Vagarwal gave following responses:

- The Licensing Authority has noted concern regarding the apparent lack of thorough consideration in the application.

- Approval of the application is likely to contribute to further saturation of alcohol-related businesses within a CIZ, without assurances of any mitigating measures.

- The Licensing Authority maintains that the applicant has not sufficiently demonstrated their business would avoid negative impacts in the CIZ area or effectively reduce such impacts.

Additional evidence submitted by the Applicant on 14th October 2025

One day prior to the hearing, the Applicant's solicitors submitted two signed statements: one from the Applicant and another from her husband.

The signed statement from the Applicant asserted that: *"I have some years (three) of experience working in off-licence environment" From this experience and with the experience of my husband I am confident that I will be able to run this business and comply with the suggested conditions."*

The signed statement from the Applicant's husband asserted that: *"I have five years of working in an off- licence store which has provided me with the skills and knowledge to manage the sale of alcohol responsibly."*

Submissions made on behalf of the Applicant 's by Solicitor : Mr Mian .

Mr. Mian stated that the applicant possesses years of experience and intends to sell alcohol originating from the subcontinent.

He stated that while his client acknowledges the presumption inherent in a CIZ, it is important to note that this presumption can be rebutted.

Mr Mian is of the opinion that adherence to the proposed conditions will enable the applicant to rebut the presumption.

Mr Mian initially questioned the grounds for the Police objection, but upon review of the relevant documentation, acknowledged that the four licensing objectives were points of concern to the Metropolitan Police Service.

Mr. Mian confirmed that his client had retained an agent to provide assistance with her application.

Extra time

The Applicant and her Solicitor were granted additional time prior to the conclusion of the proceedings, as the sub-committee observed that the applicant had not fully addressed the shop's location within a CIZ. The extra time was used, and the applicant made further submissions consistent with the information previously provided.

In answer to questions from Councillors, Licensing Authority and PC Graves, the applicant/Mr Mian gave the following responses:

- The applicant stated a willingness to comply with the conditions set by the Licensing Authority.

- The applicant confirmed awareness of, and agreement with the content in both the statement and the application submitted on her behalf.

- The applicant was unable to provide a credible explanation regarding why several of the conditions proposed by her representatives were unrelated to off-licence operations, nor could she clarify why this issue was not addressed prior to their submission to the licensing authority.

- When asked about her signed statement, she clarified that she had not worked in an off-licence. Her experience was in the food industry, specifically at Subway, where no alcohol was sold. She explained that her signed statement referred to her having worked in an environment near off-licences, which allowed her to be aware of some issues associated with operating such businesses, despite not having direct experience inside one.

- She has owned the business for approximately three to four months and is currently engaged in grocery sales. She stated that the business's long-term viability may be compromised without revenue from alcohol sales.

- She confirmed that she obtained her personal licence approximately six weeks ago and was able to articulate the four licensing objectives.

- She was asked how she would address anti-social behaviour commonly associated with aggressive street drinkers. She responded that she would request these individuals not be served if they appeared intoxicated. However, she was unable to provide a comprehensive response regarding the management of aggression or indicate where she would seek support.

- She was questioned about her intentions to sell beverages originating from the sub-continent. When asked to identify some of the alcoholic drinks from that region she intended to offer, she was able to specify only one drink ("Cobra") and was unsure of the name of others.

- When questioned regarding her husband's experience, it was clarified that his background consists of stocking shelves at Sainsbury's supermarket and operating the till. His responsibilities involved handling a wide range of items rather than regularly overseeing alcohol sales.

- It was stated to the applicant that the signed statements submitted contained inaccurate information. The Applicant and Mr Mian both denied this assertion.

6. Determination of the Application

Pursuant to section 18(3) of Licensing Act 2003, the sub-committee had regard to the representations and considered which of the steps listed in section 18(4) (if any) it considered appropriate for the promotion of the licencing objectives.

In making its decision the sub-committee also had regard to the Home Office Summary Review Guidance and Brent's licensing policy. In addition, the sub-committee took account of its obligations under section 17 of the Crime and Disorder Act 1998.

The sub-committee expressed a number of concerns regarding the application, as well as the supporting evidence and information provided during the hearing, including the following:

The applicant did not provide a substantive response regarding her approach to addressing potential challenges associated with operating a business in a CIZ, an area known for street drinking and documented incidents of anti-social behaviour.

The applicant demonstrates a limited understanding of off-licence operations and the associated processes; for example, she equated tasks such as till operation and shelf stocking with managing an off-licence. Additionally, it appears that the applicant did not observe that her application contained several irrelevant conditions.

The sub-committee also concluded that the signed statements submitted regarding the applicant and her husband's experience in working in or around the off-licence business were misleading.

The applicant has not provided evidence that she or any other individual employed by the business possesses the requisite experience necessary to operate an alcohol-selling establishment within a CIZ.

The sub-committee further observed that four additional nearby businesses are involved in the sale of alcohol. Police evidence substantiates the occurrence of street drinking and significant littering involving alcohol bottles in the vicinity.

The sub-committee noted that the licensed premises is in a CIZ, where expanding alcohol sales is generally not approved. Applicants must show that their proposed licence would not harm/ negatively impact the licensing objectives.

The sub-committee determined that the applicant had not submitted sufficient evidence to support their case. In particular, the application did not provide adequate detail regarding how the licence holder intended to proactively address the concerns raised by both the licensing Police and the licensing authority.

7. Decision

The sub-committee had regard to the need to reach a decision that was proportionate and justified on the evidence presented to it. The sub-committee listened carefully to the representations made by the parties in person at the hearing and all written representations submitted.

After careful consideration of all relevant factors, the sub-committee has concluded that granting the application would undermine the following licensing objectives:

• Prevention of crime and disorder;
• Public safety; and
• Prevention of public nuisance.

Therefore, the sub-committee refused the application to grant the application.

8. Right of Appeal

The applicant and any person who made relevant representations has the right to appeal against this decision pursuant to section 181 and schedule 5 of the Licensing Act 2003.

If you wish to appeal you must notify Willesden Magistrates' Court within **21 days** from the date the Council informed you of this decision.

20 October 2025

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METROPOLITAN POLICE

Working together for a safer London

TERRITORIAL POLICING

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

NW BCU Licensing Department - Brent
Wembley Police Station
603, Harrow Road
Wembley
HA0 2HH
Tel: 07500 087 115
Email: Phil.S.Graves@met.police.uk
Web: www.met.police.uk

Your Ref: 37165

Our ref: 01QK/037/25/3122NW

Date: Wednesday 28th of January 2026.

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.

<u>The Application</u>

The application is to add alcohol to the existing convenience store from 09.00 to 22.00 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.

An almost identical application was submitted in August 2025 with longer licensable hours which was refused by the licensee committee.

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

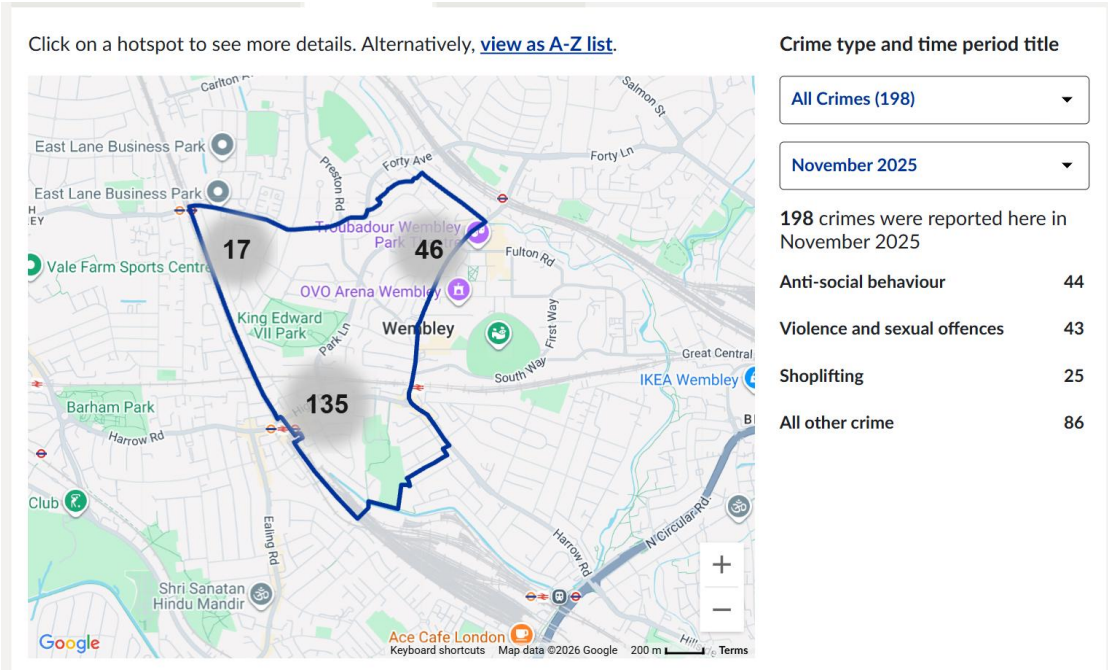
https://www.brent.gov.uk/nuisance-crime-and-community-safety/public-spaces-protection-orders#pspos

"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."

Venue Name	Address	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 maps show the crime figures for November 2025. You can see from the zoomed in image that there is a high concentration of crime around the Wembley Triangle

In addtion 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.

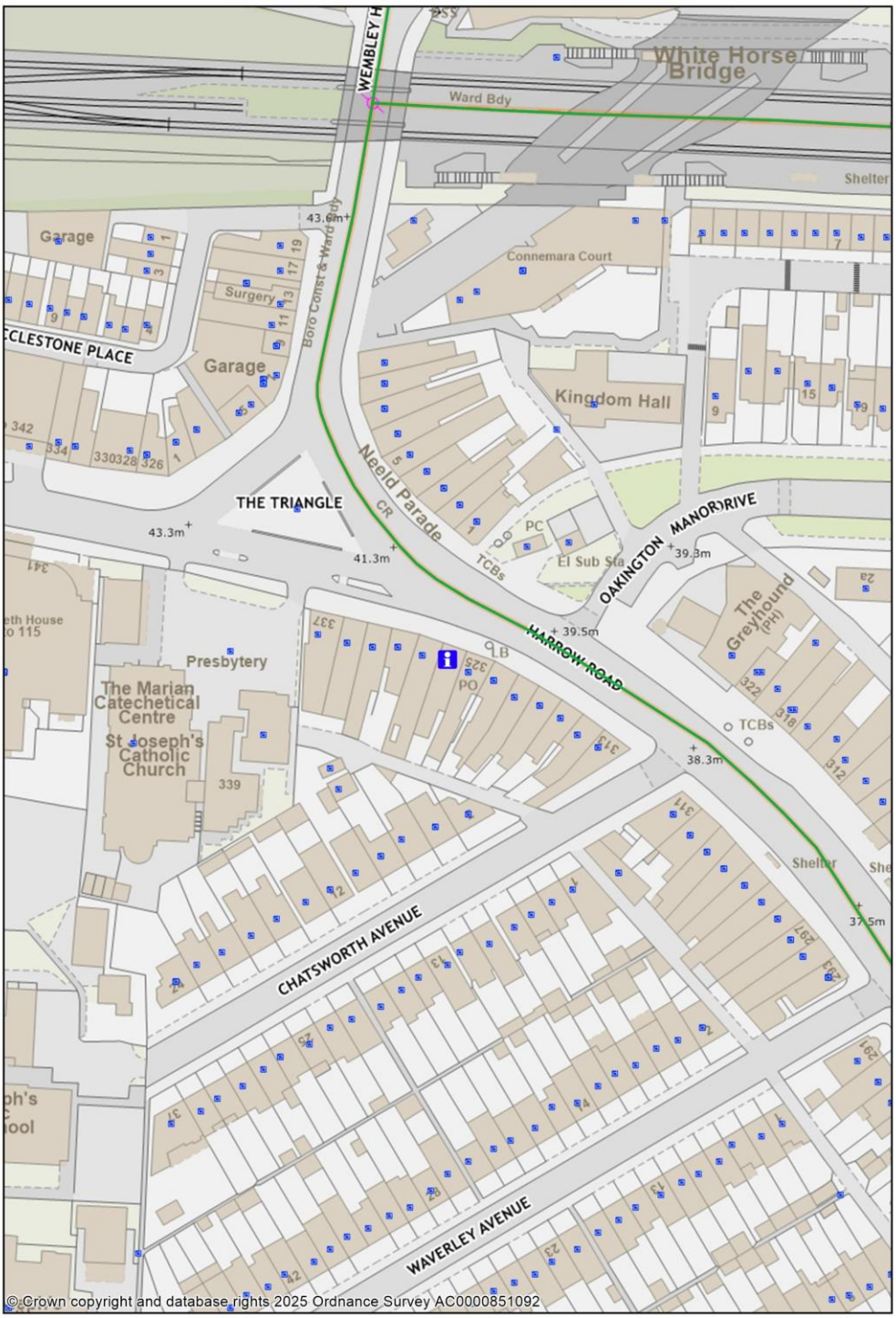
Allowing this application to progress, no matter how strict a list of conditions imposed, would only add to more alcohol on the streets, more street drinking, more ASB and crime in the area.

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

Basemap Map



1:1250

0 0.02 0.04 kilometres

Brent

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