Public Document Pack

Alcohol and Entertainment Licensing Sub-Committee

Wednesday 21 October 2026 at 2.00 pm

Boardrooms 7 & 8, 3rd Floor, Brent Civic Centre

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:	**Substitute Members:** Councillors:
P Ahmed (Chair) Burn Do Rosario	Aden, Clinton, Mahmood, Chowdhury, Mulaisho, Alexandre, Vakani

For further information contact: Devbai Bhanji, Governance Assistant
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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 a Variation to a Premises Licence by Zebu Butchers Ltd for the premises known as Zebu Butchers, Unit 38 Sapcote Trading Centre, High Road, NW10 2DJ, pursuant to the provisions of the Licensing Act 2003** Agenda republished on 19 October 2026 to include attachments 3.10(a) & (b) and 3.16(a)	1 - 114

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LICENSING ACT 2003

Application for a Variation to a Premises Licence

1. The Application

Name of Applicant:	Zebu Butchers Ltd
Name & Address of Premises:	Zebu Butchers, Unit 38 Sapcote Trading Centre, High Road, NW10 2DJ
Applicants Agent:	Patricia de Farias Jimeno - PFJ Consultancy Ltd

1. Application

The application is to vary the licence as follows:

- To extend the licensed area to include the private car parking area belonging to Unit 38, as shown edged red on the amended licensing plan. This external area will be used by customers for seating and for the consumption of food and alcohol (on-sales).

- To extend the permitted hours for the sale of alcohol (on and off the premises) from 9.00pm to 00:00 (midnight), Monday to Sunday.

- To extend the opening hours from 9:00pm to 00:30, Monday to Sunday.

- To add the licensable activity of Live Music from 12:00 to 00:00 (midnight), Monday to Sunday, to take place solely within the internal area of the premises and not in any external areas, including the deck and private external area shown on the amended licensing plan.

- To add the licensable activity of Recorded Music from 10:00 to 00:00 (midnight), Monday to Sunday, with recorded music permitted indoors until 00:00 (midnight) and outdoors until 22:00.

2. Background

The premises are currently licensed for:

Sale of Alcohol from 10.00am – 9.00pm Monday to Sunday and to remain open from 9.00am to 9.00pm Monday to Sunday.

Through liaison with the Licensing Officer, the applicant has since removed the request to extend the outside area.

3. Promotion of the Licensing Objectives

See page 11 of the application

4. Relevant Representations

Representations have been received and withdrawn from the Licensing Officer and Police. Representations remain outstanding from a member of the public.

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. Associated Papers

A. Application Form
B. Police Representation
C. Public Representation
D. Licensing Rep
E. Current Licence
F. OS Map

APPLICATION TO VARY A PREMISES LICENCE

Application to vary a premises licence
under The Licensing Act 2003

PLEASE READ THE FOLLOWING INSTRUCTIONS FIRST

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

I/We ZEBU BUTCHER'S LTD

..... *[insert name of applicant(s)]* **being the premises licence holder, apply to vary a premises licence under section 34 of the Licensing Act 2003 for the premises described in Part 1 below**

Premises licence number	31765

Part 1 – Premises Details

Postal address of premises or, if none, ordnance survey map reference or description 38 Sapcote Trading Centre High Road	
Post Town London	**Post Code** NW10 2DJ
Telephone number at premises (if any)	
Non-domestic rateable value of premises	£ 13,500

Part 2 - Applicant details

Daytime contact telephone number		[redacted]	
E-mail address (optional)		[redacted]	
Current postal address if different from premises address			
Post Town		**Post Code**	

Part 3 - Variation

Please tick ✓ **Yes**

Do you want the proposed variation to have effect as soon as possible? ☑

If not do you want the variation to take effect from

Day		Month		Year			

Do you want the proposed variation to have effect in relation to the introduction of the late night levy? (Please see guidance note 1) ☐ Yes ☑ No

Please describe briefly the nature of the proposed variation (Please see guidance note 2)
This is an application under section 34 of the Licensing Act 2003 to vary Premises Licence No. 31765 as follows:

1. To extend the licensed area to include the private car parking area belonging to Unit 38, as shown edged red on the amended licensing plan. This external area will be used by customers for seating and for the consumption of food and alcohol (on-sales).
2. To extend the permitted hours for the sale by retail of alcohol (on and off the premises) to 10:00 to 00:00 (midnight), Monday to Sunday.
3. To extend the hours the premises are open to the public to 09:00 to 00:30, Monday to Sunday.
4. To add the licensable activity of Live Music (both amplified and unamplified), 12:00 to 00:00 (midnight), Monday to Sunday, to take place solely within the internal area of the licensed premises and not in any external areas, including the deck and private external area shown on the amended licensing plan.
5. To add the licensable activity of Recorded Music (background music), from 10:00 to 00:00 (midnight), Monday to Sunday, throughout the licensed premises, with recorded music permitted indoors until 00:00 (midnight) and outdoors until 22:00.

If your proposed variation would mean that 5,000 or more people are expected to attend the premises at any one time, please state the number expected to attend

Part 4 – Operating Schedule

Please complete those parts of the Operating Schedule below which would be subject to change if this application to vary is successful.

		Please tick ✓ **Yes**
Provision of regulated entertainment (please see guidance note 3)		
a)	plays (if ticking yes, fill in box A)	☐
b)	films (if ticking yes, fill in box B)	☐
c)	indoor sporting events (if ticking yes, fill in box C)	☐
d)	boxing or wrestling entertainment (if ticking yes, fill in box D)	☐
e)	live music (if ticking yes, fill in box E)	☑
f)	recorded music (if ticking yes, fill in box F)	☑
g)	performances of dance (if ticking yes, fill in box G)	☐
h)	anything of a similar description to that falling within (e), (f) or (g) (if ticking yes, fill in box H)	☐
Provision of late night refreshment (if ticking yes, fill in box I)		☐
Sale by retail of alcohol (if ticking yes, fill in box J)		☑

In all cases complete boxes K, L and M

A

Plays Standard days and timings (please read guidance note 8)			**Will the performance of a play take place indoors or outdoors or both –** please tick [✓] (please read guidance note 4).		
Day	Start	Finish		Indoors	
				Outdoors	
				Both	
Mon			**Please give further details here** (please read guidance note 5)		
Tue					
Wed			**State any seasonal variations for performing plays (**please read guidance note 6)		
Thur					
Fri			**Non standard timings. Where you intend to use the premises for the performance of plays at different times to those listed in the column on the left, please list** (please read guidance note 7)		
Sat					
Sun					

B

Films Standard days and timings (please read guidance note 8)			**Will the exhibition of films take place indoors or outdoors or both –** please tick [✓] (please read guidance note 4).		
Day	Start	Finish		Indoors	
				Outdoors	
				Both	
Mon			**Please give further details here** (please read guidance note 5)		
Tue					
Wed			**State any seasonal variations for the exhibition of films (**please read guidance note 6)		
Thur					
Fri			**Non standard timings. Where you intend to use the premises for the exhibition of films at different times to those listed in the column on the left, please list** (please read guidance note 7)		
Sat					
Sun					

C

Indoor sporting events Standard days and timings (please read guidance note 8)			**Please give further details** (please read guidance note 5)
Day	Start	Finish	
Mon			**State any seasonal variations for indoor sporting events** (please read guidance note 6)
Tue			
Wed			
Thur			**Non standard timings. Where you intend to use the premises for indoor sporting events at different times to those listed in the column on the left, please list** (please read guidance note 7)
Fri			
Sat			
Sun			

D

Boxing or wrestling entertainments Standard days and timings (please read guidance note 8)			**Will the boxing or wrestling entertainment take place indoors or outdoors or both –** please tick [✓] (please read guidance note 4).	Indoors	
Day	Start	Finish		Outdoors	
				Both	
Mon			**Please give further details here** (please read guidance note 5)		
Tue					
Wed			**State any seasonal variations for boxing or wrestling entertainment (**please read guidance note 6)		
Thur					
Fri			**Non standard timings. Where you intend to use the premises for boxing or wrestling entertainment at different times to those listed in the column on the left, please list** (please read guidance note 7**)**		
Sat					
Sun					

E

Live Music Standard days and timings (please read guidance note 8)			**Will the performance of live music take place indoors or outdoors or both –** please tick [✓] (please read guidance note 4)		
				Indoors	✓
				Outdoors	
Day	Start	Finish		Both	
Mon	12:00	00:00	**Please give further details here** (please read guidance note 5) Amplified & unamplified live music. Indoors only (internal area); not in any external area.		
Tue	12:00	00:00			
Wed	12:00	00:00	**State any seasonal variations for the performance of live music (**please read guidance note 6)		
Thur	12:00	00:00			
Fri	12:00	00:00	**Non standard timings. Where you intend to use the premises for the performance of live music at different times to those listed in the column on the left, please list** (please read guidance note 7)		
Sat	12:00	00:00			
Sun	12:00	00:00			

F

Recorded music Standard days and timings (please read guidance note 8)			**Will the playing of recorded music take place indoors or outdoors or both –** please tick [✓] (please read guidance note 4)		
				Indoors	
				Outdoors	
Day	Start	Finish		Both	✓
Mon	10:00	00:00	**Please give further details here** (please read guidance note 5) Recorded Music (Background Music). Permitted both indoors and outdoors within the licensed premises. Indoor: recorded background music until 00:00 (midnight), Monday to Sunday.		
Tue	10:00	00:00			
Wed	10:00	00:00	**State any seasonal variations for playing recorded music (**please read guidance note 6)		
Thur	10:00	00:00			
Fri	10:00	00:00	**Non standard timings. Where you intend to use the premises for the playing of recorded music entertainment at different times to those listed in the column on the left, please list** (please read guidance note 7) Outdoor: recorded music only until 22:00, Monday to Sunday, kept at a reasonable and considerate volume at all times so as not to cause disturbance or nuisance to neighbouring properties or residents. No live music permitted in the outdoor areas.		
Sat	10:00	00:00			
Sun	10:00	00:00			

G

Performances of dance Standard days and timings (please read guidance note 8)			**Will the performance of dance take place indoors or outdoors or both –** please tick [✓] (please read guidance note 4).		
				Indoors	
				Outdoors	
Day	Start	Finish		Both	
Mon			**Please give further details here** (please read guidance note 5)		
Tue					
Wed			**State any seasonal variations for the performance of dance** (please read guidance note 6)		
Thur					
Fri			**Non standard timings. Where you intend to use the premises for the performance of dance entertainment at different times to those listed in the column on the left, please list** (please read guidance note 7)		
Sat					
Sun					

H

Anything of a similar description to that falling within (e), (f) or (g) Standard days and timings (please read guidance note 8)			**Please give a description of the type of entertainment you will be providing**		
			Will this entertainment take place indoors or outdoors or both – please tick [✓] (please read guidance note 4).	Indoors	
				Outdoors	
Day	Start	Finish		Both	
Mon			**Please give further details here** (please read guidance note 5)		
Tue					
Wed			**State any seasonal variations for entertainment of a similar description to that falling within (e), (f) or (g) (**please read guidance note 6)		
Thur					
Fri			**Non standard timings. Where you intend to use the premises for the entertainment of similar description to that falling within (e), (f) or (g) at different times to those listed in the column on the left, please list** (please read guidance note 7)		
Sat					
Sun					

I

Late night refreshment Standard days and timings (please read guidance note 8)			**Will the provision of late night refreshment take place indoors or outdoors or both –** please tick [✓] (please read guidance note 4).		
Day	Start	Finish		Indoors	
				Outdoors	
				Both	
Mon			**Please give further details here** (please read guidance note 5)		
Tue					
Wed			**State any seasonal variations for the provision of late night refreshment (**please read guidance note 6)		
Thur					
Fri			**Non standard timings. Where you intend to use the premises for the provision of late night refreshment at different times, to those listed in the column on the left, please list** (please read guidance note 7)		
Sat					
Sun					

J

Supply of alcohol Standard days and timings (please read guidance note 8)			**Will the supply of alcohol be for consumption (Please tick box ✓)** (please read guidance note 9)		
Day	Start	Finish		On the premises	
				Off the premises	
				Both	✓
Mon	10:00	00:00	**State any seasonal variations for the supply of alcohol (**please read guidance note 6)		
Tue	10:00	00:00			
Wed	10:00	00:00	**Non-standard timings. Where you intend to use the premises for the supply of alcohol at different times to those listed in the column on the left, please list** (please read guidance note 7)		
Thur	10:00	00:00			
Fri	10:00	00:00			
Sat	10:00	00:00			
Sun	10:00	00:00			

IN ALL CASES PLEASE COMPLETE K, L, & M BELOW

K

Please highlight any adult entertainment or services, activities, other entertainment or matters ancillary to the use of the premises that may give rise to concern in respect of children (please read guidance note 10)

None. No adult entertainment or services are provided at the premises. Nothing in this proposed variation is considered to give rise to concern in respect of children.

L

Hours premises are open to the public
Standard days and timings
(please read guidance note 8)

Day	Start	Finish
Mon	09:00	00:30
Tue	09:00	00:30
Wed	09:00	00:30
Thur	09:00	00:30
Fri	09:00	00:30
Sat	09:00	00:30
Sun	09:00	00:30

State any seasonal variation (please read guidance note 6)

Non-standard timings. Where you intend the premises to be open to the public at different times to those listed in the column on the left, please list (please read guidance note 7)

Please identify those conditions currently imposed on the licence which you believe could be removed as a consequence of the proposed variation you are seeking

Condition 20 currently restricts the sale of alcohol to 10:00 to 21:00 hours, seven days a week. As a consequence of the proposed variation, Condition 20 should be amended (or removed) to reflect the proposed permitted hours for the sale by retail of alcohol of 10:00 to 00:00 (midnight), Monday to Sunday.

Condition 22 (which restricts customers from taking open drink containers outside the premises as defined on the approved plan) should be amended to reflect the amended licensing plan, so that the extended external licensed area (the private car parking area of Unit 38) is included within the premises where alcohol may be consumed.

Please tick ✓ **Yes**

- I have enclosed the premises licence ☑
- I have enclosed the relevant part of the premises licence ☐

If you have not ticked one of these boxes please fill in reasons for not including the licence, or part of it, below

Reasons why I have failed to enclose the premises licence or relevant part of premises licence

M Describe any additional steps that you intend to take to promote the four licensing objectives as a result of the proposed variation:

a) General – all four licensing objectives (b, c, d, e) (please read guidance note 11)

The premises will continue to be operated so as to promote all four licensing objectives and in accordance with the existing conditions on the premises licence. Staff will be trained in the requirements of the Licensing Act 2003 and the conditions of the licence.

b) The prevention of crime and disorder

A Challenge 25 age-verification policy will be operated and a refusals log maintained. CCTV will be maintained throughout the premises and the licensed area, including the private car parking area of Unit 38, with recordings kept for at least 31 days and made available to the police and authorised officers on request. An incident log will be kept.

c) Public safety

Safe occupancy limits will be observed. Fire exits, signage and equipment will be kept clear and maintained. Risk assessments will be reviewed to reflect the extended licensed area, the extended hours and the provision of live music.

d) The prevention of public nuisance

Live music will take place indoors only and will finish by 00:00. Recorded background music will be played indoors until 00:00 and outdoors until 22:00; outdoor music will be kept at a reasonable and considerate volume and monitored so as not to cause a nuisance to neighbouring properties or residents. No live music will be permitted outdoors. The external and car parking areas will be supervised and notices will ask customers to leave quietly. Refuse and bottles will not be disposed of outside during late hours. The disposal of bottles and waste into the external containers will be carried out in a manner that minimises noise and avoids disturbance to neighbouring properties, particularly during later hours.

e) The protection of children from harm

A Challenge 25 policy will be operated for all sales of alcohol. No adult entertainment will be provided at the premises.

	Please tick ✓ Yes
▪ I have made or enclosed payment of the fee	☑
▪ I have not made or enclosed payment of the fee because this application has been made in relation to the introduction of the late night levy	☐
▪ I have sent copies of this application and the plan to responsible authorities and others where applicable	☑
▪ I understand that I must now advertise my application	☑
▪ I have enclosed the premises licence or relevant part of it or explanation	☑
▪ I understand that if I do not comply with the above requirements my application will be rejected	☑

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

Part 5 – Signatures (please read guidance note 12)

Signature of applicant (the current premises licence holder) or applicant's solicitor or other duly authorised agent. (Please read guidance note 13). **If signing on behalf of the applicant please state in what capacity.**

Signature [redacted]

Date 26/08/2026

Capacity DIRECTOR OF ZEBU BUTCHER'S LTD

Where the premises licence is jointly held signature of 2nd applicant (the current premises licence holder) or 2nd applicant's solicitor or other authorised agent. (Please read guidance note 14). **If signing on behalf of the applicant please state in what capacity.**

Signature .....

Date .....

Capacity .....

Contact name (where not previously given) and postal address for correspondence associated with this application (please read guidance note 15)

ZEBU BUTCHER'S LTD
38 Sapcote Trading Centre, High Road

Post town London	**Post code** NW10 2DJ
Telephone number [redacted]	

If you would prefer us to correspond with you by e-mail your e-mail address (optional)

NOTES FOR GUIDANCE

This application cannot be used to vary the licence so as to extend the period for which the licence has effect or to vary substantially the premises to which it relates. If you wish to make that type of change to the premises licence you should make a new premises licence application under section 17 of the Licensing Act 2003.

1. You do not have to pay a fee if the only purpose of the variation for which you are applying is to avoid becoming liable for the late night levy
2. Describe the premises. For example, the type of premises, its general situation and layout and any other information which could be relevant to the licensing objectives. Where your application includes off-supplies of alcohol and you intend to provide a place of consumption of these off-supplies of alcohol, you must include a description of where the place will be and its proximity to the premises.
3. In terms of specific regulated entertainments please note that:
    - Plays: no licence is required for performances between 08.00 and 23.00 on any day, provided that the audience does not exceed 500.
    - Films: no licence is required for 'not-for-profit' film exhibition held in community premises between 08.00 and 23.00 on any day provided that the audience does not exceed 500 and the organiser (a) gets consent to the screening from a person who is responsible for the premises; and (b) ensures that each such screening abides by age classification ratings.
    - Indoor sporting events: no licence is required for performances between 08.00 and 23.00 on any day, provided that the audience does not exceed 1000.
    - Boxing or Wrestling Entertainment: no licence is required for a contest, exhibition or display of Greco-Roman wrestling, or freestyle wrestling between 08.00 and 23.00 on any day, provided that the audience does not exceed 1000. Combined fighting sports – defined as a contest, exhibition or display which combines boxing or wrestling with one or more martial arts – are licensable as a boxing or wrestling entertainment rather than an indoor sporting event.
    - Live music: no licence permission is required for:
        - a performance of unamplified live music between 08.00 and 23.00 on any day, on any premises.
        - a performance of amplified live music between 08.00 and 23.00 on any day on premises authorised to sell alcohol for consumption on those premises, provided that the audience does not exceed 500.
        - a performance of amplified live music between 08.00 and 23.00 on any day, in a workplace that is not licensed to sell alcohol on those premises, provided that the audience does not exceed 500.
        - a performance of amplified live music between 08.00 and 23.00 on any day, in a church hall, village hall, community hall, or other similar community premises, that is not licensed by a premises licence to sell alcohol, provided that (a) the audience does not exceed 500, and (b) the organiser gets consent for the performance from a person who is responsible for the premises.
        - a performance of amplified live music between 08.00 and 23.00 on any day, at the non-residential premises of (i) a local authority, or (ii) a school, or (iii) a hospital, provided that (a) the audience does not exceed 500, and (b) the organiser gets consent for the performance on the relevant premises from: (i) the local authority concerned, or (ii) the school or (iii) the health care provider for the hospital.
    - Recorded Music: no licence permission is required for:
        - any playing of recorded music between 08.00 and 23.00 on any day on premises authorised to sell alcohol for consumption on those premises, provided that the audience does not exceed 500.
        - any playing of recorded music between 08.00 and 23.00 on any day, in a church hall, village hall, community hall, or other similar community premises, that is not licensed by a premises licence to sell alcohol, provided that (a) the audience does not exceed 500, and (b) the organiser gets consent for the performance from a person who is responsible for the premises.

- any playing of recorded music between 08.00 and 23.00 on any day, at the non-residential premises of (i) a local authority, or (ii) a school, or (iii) a hospital, provided that (a) the audience does not exceed 500, and (b) the organiser gets consent for the performance on the relevant premises from: (i) the local authority concerned, or (ii) the school proprietor or (iii) the health care provider for the hospital.

- Dance: no licence is required for performances between 08.00 and 23.00 on any day, provided that the audience does not exceed 500. However, a performance which amounts to adult entertainment remains licensable.
- Cross activity exemptions: no licence is required between 08.00 and 23.00 on any day, with no limit on audience size for:
  - any entertainment taking place on the premises of the local authority where the entertainment is provided by or on behalf of the local authority;
  - any entertainment taking place on the hospital premises of the health care provider where the entertainment is provided by or on behalf of the health care provider;
  - any entertainment taking place on the premises of the school where the entertainment is provided by or on behalf of the school proprietor; and
  - any entertainment (excluding films and a boxing or wrestling entertainment) taking place at a travelling circus, provided that (a) it takes place within a moveable structure that accommodates the audience, and (b) that the travelling circus has not been located on the same site for more than 28 consecutive days.

4. Where taking place in a building or other structure please tick as appropriate (indoors may include a tent).

5. For example state type of activity to be authorised, if not already stated, and give relevant further details, for example (but not exclusively) whether or not music will be amplified or unamplified.
6. For example (but not exclusively), where the activity will occur on additional days during the summer months.
7. For example (but not exclusively), where you wish the activity to go on longer on a particular day e.g. Christmas Eve.
8. Please give timings in 24 hour clock (e.g. 16.00) and only give details for the days of the week when you intend the premises to be used for the activity.
9. If you wish people to be able to consume alcohol on the premises, please tick 'on the premises'. If you wish people to be able to purchase alcohol to consume away from the premises, please tick 'off the premises'. If you wish people to be able to do both, please tick 'both'.
10. Please give information about anything intended to occur at the premises or ancillary to the use of the premises which may give rise to concern in respect of children regardless of whether you intend children to have access to the premises, for example (but not exclusively) nudity or semi-nudity, films for restricted age groups or the presence of gaming machines.
11. Please list here steps you will take to promote all four licensing objectives together.
12. The application form must be signed.
13. An applicant's agent (for example solicitor) may sign the form on their behalf provided that they have actual authority to do so.
14. Where there is more than one applicant, each of the applicants or their respective agents must sign the application form.
15. This is the address which we shall use to correspond with you about this application.

***Data Protection**: The London Borough of Brent will use this information for the purposes of The Licensing Act 2003 and related purposes. Any member of the public may examine the application form on request. Further information can be found at www.brent.gov.uk/privacy*

You are providing your information to Brent Council, contact details business.licence@brent.gov.uk. The Council's Data Protection Officer can be contacted via dpo@brent.gov.uk, or 020 8937 1402.
Your information is collected for the purpose of processing your licence application as required to fulfil the council's duties under the following legislation, statutory or contractual requirement or obligation.

Legislation	***Context***
Licensing Act 2003	*For the processing of licensing applications and the prevention of fraud*

The information may be shared with the Metropolitan Police, London Fire Brigade and teams within Brent Council, as statutory consultees, the Home Office to ascertain the right to work and HM Revenue and Customs, at their request, to identify potential fraud. The information shall be retained until the licence is surrendered and shall be processed in adherence to your legal rights, including but not limited to the right to withdraw consent, right to copies of your information and right to be forgotten. You have a right to lodge a complaint with the Information Commissioner's Office (www.ico.org.uk)

.

Please return the completed form and accompanying documents to:-

Licensing Department
Brent Council
Fifth Floor
Brent Civic Centre
Engineers Way
Wembley
HA9 0FJ

☎ 020 8937 5359 Email: business.licence@brent.gov.uk

Cheques should be crossed and made payable to: London Borough of Brent.

Follow the instructions in the checklist, to submit the relevant copies to the Chief Office of Police and/or the Responsible Authorities. Contact details shown below:

Chief Officer of Police
Brent Licensing Department
Fifth Floor
Brent Civic Centre
Engineers Way
Wembley
HA9 0FJ

Tel: 020 8733 3206

North West Area 1
London Fire Brigade
169 Union Street
London
SE1 0LL

Tel: 020 8555 1200 x38778

Trading Standards
Fifth Floor
Brent Civic Centre
Engineers Way
Wembley
HA9 0FJ

Tel: 020 8937 5555

Environmental Health
Fifth Floor
Brent Civic Centre
Engineers Way
Wembley
HA9 0FJ

Tel: 020 8937 5252

Children's Services
Brent Civic Centre
Engineers Way
Wembley
HA9 0FJ

Licensing Authority
Fifth Floor
Brent Civic Centre
Engineers Way
Wembley
HA9 0FJ

Tel: 020 8937 5359

Planning Department
Brent Civic Centre
Engineers Way
Wembley
HA9 0FJ

Tel: 020 8937 5210

Public Safety Team
Fifth Floor
Brent Civic Centre
Engineers Way
Wembley
HA9 0FJ
Tel: 020 8937 5359

DAAT
Public Health Directorate
Wembley Centre for Health and Care
116 Chaplin Road
Wembley
HA0 4UZ

Home Office Immigration Enforcement
Alcohol Licensing Team
Lunar House
40 Wellesley Road
Croydon
CR9 2BY

alcohol@homeoffice.gsi.gov.uk

Official Use Only. Existing Premises Licence (or explanation) ☐ Plan x 2 (if applicable) ☐
Advertising ☐ Fee ☐

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ZEBU BUTCHER'S LTD

SUPPLEMENTARY OPERATING, SAFETY AND LICENSING INFORMATION

To: Brent Council - Licensing Authority

Premises: Zebu Butcher's Ltd, Unit 38, Sapcote Trading Centre, High Road, London, NW10 2DJ

Premises Licence No.: 31765

Full Variation Application Ref.: 39346

1. PURPOSE OF THIS DOCUMENT

Zebu Butcher's Ltd voluntarily provides this supplementary information to Brent Council in support of its Full Variation application. We wish to give the Licensing Authority a clear and comprehensive understanding of how the premises currently operates, the management controls already in place, and the additional safeguards proposed in connection with the variation.

The variation seeks to extend the licensed area to include the private car park at Unit 38; extend the hours for the sale and consumption of alcohol to 10:00-00:00 and opening hours to 09:00-00:30; add live music indoors from 12:00-00:00; recorded music outdoors from 10:00-22:00; and recorded music indoors from 10:00-00:00, Monday to Sunday.

Our intention is to operate responsibly and transparently and to continue working constructively with Brent Council, the Metropolitan Police and neighbouring businesses.

2. NATURE OF THE PROPOSED OPERATION

Zebu Butcher's is a family-based business with an existing premises licence. The proposed variation is not intended to change the nature of the premises into a nightclub or late-night drinking establishment.

The existing table and seating arrangements will remain part of the normal operation. No dance floor is proposed and no nightclub-style entertainment is proposed. Any live music provided indoors is intended as ancillary entertainment for customers.

3. PREVENTION OF CRIME AND DISORDER

Zebu Butcher's has never had a police incident at the premises. We do not tolerate fighting, disorder, anti-social behaviour, drug-related activity or other inappropriate conduct at or in connection with the premises.

The premises displays notices reminding customers to behave respectfully and to respect others. These expectations will also apply to customers using the private car park.

Management and staff will continue to monitor customer behaviour, intervene where appropriate, and record relevant incidents in the premises incident log. We recognise concerns regarding crime and anti-social behaviour in the wider area and are willing to work constructively with Brent Council, the Metropolitan Police and neighbouring businesses on appropriate measures or local initiatives aimed at improving safety and reducing crime and anti-social behaviour.

4. CCTV AND COOPERATION WITH AUTHORITIES

Zebu Butcher's already maintains and operates CCTV covering relevant internal and external areas, in accordance with applicable data protection responsibilities. Relevant staff are trained in its operation and management ensures that the system is maintained in working order.

We have cooperated when CCTV footage or information has been requested concerning incidents involving neighbouring premises or the surrounding area. We will continue to cooperate with reasonable requests from Brent Council and the Metropolitan Police for relevant footage or information so that the facts and circumstances of incidents can be properly established.

5. RESPONSIBLE ALCOHOL SALES, RECORDS AND STAFF TRAINING

Zebu Butcher's already maintains responsible management practices including staff training, responsible alcohol sales, refusals where appropriate, Challenge 25, incident recording and management oversight. The premises maintains an incident log and a refusals log.

Staff involved in the sale or supply of alcohol receive appropriate training covering licensing responsibilities, Challenge 25, identification requirements, refusals, responsible alcohol sales, prevention of disorder, incident recording and relevant premises procedures. Training records are maintained.

Where a customer appears to be under 25, staff request acceptable photographic identification before alcohol is supplied. If satisfactory identification cannot be produced, the sale is refused.

6. PRIVATE CAR PARK AND EXTERNAL CUSTOMER AREA

The maximum capacity of the external customer area will be 25 people at any one time, comprising both seated and standing customers.

The private car park will not be treated as an unsupervised extension of the premises. Whenever it is being used as an outdoor customer area, it will be actively monitored and supervised by staff.

The area will be clearly defined and physically separated from vehicle movements by means of a suitable removable barrier system. The barriers will be put in place whenever the area is being used by customers and removed and stored when the area is not in use.

The existing emergency exit adjacent to the main entrance will be kept clear and unobstructed, and vehicle circulation routes will remain unobstructed. Staff will monitor the external area to help prevent disorder, excessive noise, littering or anti-social behaviour.

Fighting, disorder, anti-social behaviour and drug-related activity will not be tolerated in the car park or any other part of the premises. Customers will be expected to behave respectfully towards other customers, neighbouring businesses and the wider Trading Estate.

CCTV coverage and the premises' existing management controls will support supervision of the external area. Any relevant incident will be dealt with appropriately and recorded in the premises incident log.

The use of the car park will therefore form part of the managed operation of Zebu Butcher's and will be subject to the same standards of responsible management that apply to the rest of the premises.

Written landlord authorisation permitting the use of the private car park as an outdoor customer seating area has been provided separately to the Licensing Authority.

Zebu Butcher's would be happy to follow any recommendations from Brent Council regarding the most appropriate type of barrier or any additional reasonable safety measures for the private car park.

7. CONTROL OF THE LICENSED AREA AND PSPO

Zebu Butcher's understands the distinction between the licensed premises area and public areas outside the authorised boundary. Staff already ensure that customers do not take alcohol beyond the currently authorised area and routinely remind customers of this restriction.

If the variation is granted, staff will continue to monitor the authorised external customer area and will not permit customers to take alcohol beyond the licensed boundary. Zebu Butcher's recognises the relevance of the Brent Public Spaces Protection Order and will continue to cooperate with authorised officers in relation to it.

8. MUSIC AND NOISE MANAGEMENT

There will be no bands, DJs or amplified live entertainment in the external area. There will be no fixed outdoor speakers.

Recorded music outdoors is proposed between 10:00 and 22:00 only. A small portable speaker will be used solely for recorded background music at a controlled, low volume and will be removed by 22:00.

Live music proposed under the variation will take place indoors only between 12:00 and 00:00. Recorded music indoors is proposed between 10:00 and 00:00.

Music will be managed so as not to cause nuisance to nearby residents or businesses. Volume will be controlled by management and staff will respond promptly to any reasonable complaint or concern regarding noise.

9. CUSTOMER DISPERSAL

Towards the end of the permitted alcohol and entertainment hours, staff will encourage customers to leave quietly and in an orderly manner, avoid unnecessary congregation and respect neighbouring businesses and residents. Management will take reasonable steps to prevent disorder, excessive noise or anti-social behaviour associated with customers leaving the premises.

10. PUBLIC SAFETY

The premises is already managed with public safety in mind. The existing emergency exit adjacent to the main entrance is kept clear and unobstructed, staff understand the existing emergency procedures, and the premises is managed so as to avoid unnecessary obstruction or overcrowding.

The external customer area will be supervised and separated from vehicle movements while in use.

11. PROTECTION OF CHILDREN

Zebu Butcher's recognises the importance of protecting children from harm and already operates responsible procedures in relation to children and the sale of alcohol.

Challenge 25 is already in operation. Alcohol will not be sold or supplied to anyone under the legal age and, where satisfactory identification cannot be produced, the sale will be refused.

Where children are present at the premises, staff routinely remind parents or responsible adults that children should remain with and under the supervision of their parent or responsible adult. This forms part of Zebu Butcher's existing approach to maintaining a safe and family-friendly environment.

12. PREVIOUS ENGAGEMENT AND COOPERATION WITH BRENT COUNCIL

Zebu Butcher's has always sought to maintain an open, transparent and cooperative relationship with Brent Council. Council officers have attended the premises on a number of occasions, including following complaints or concerns raised about the business, and we have cooperated with those visits and provided access and information as required.

Some allegations made concerning the premises have, in our view, not reflected the way in which Zebu Butcher's actually operates. Council officers have had the opportunity to attend the premises and observe our operation directly. To the best of our knowledge, those visits have not resulted in Brent Council identifying the type of disorderly or inappropriate operation that has sometimes been alleged in relation to our premises.

We will continue to welcome appropriate engagement with Brent Council, respond openly to legitimate concerns and consider reasonable improvements or recommendations where appropriate.

13. CONTINUED COOPERATION WITH BRENT, POLICE AND LOCAL BUSINESSES

Zebu Butcher's wishes to maintain a constructive working relationship with Brent Council, the Metropolitan Police and businesses surrounding the premises.

We are willing to participate constructively in appropriate local initiatives, communication arrangements or other reasonable measures that may assist in preventing crime, disorder and anti-social behaviour and improving safety in the Sapcote Trading Estate.

We are also willing to consider reasonable and proportionate recommendations from the Licensing Authority regarding the proposed operation and any additional measures that may assist in promoting the licensing objectives.

14. CONCLUSION

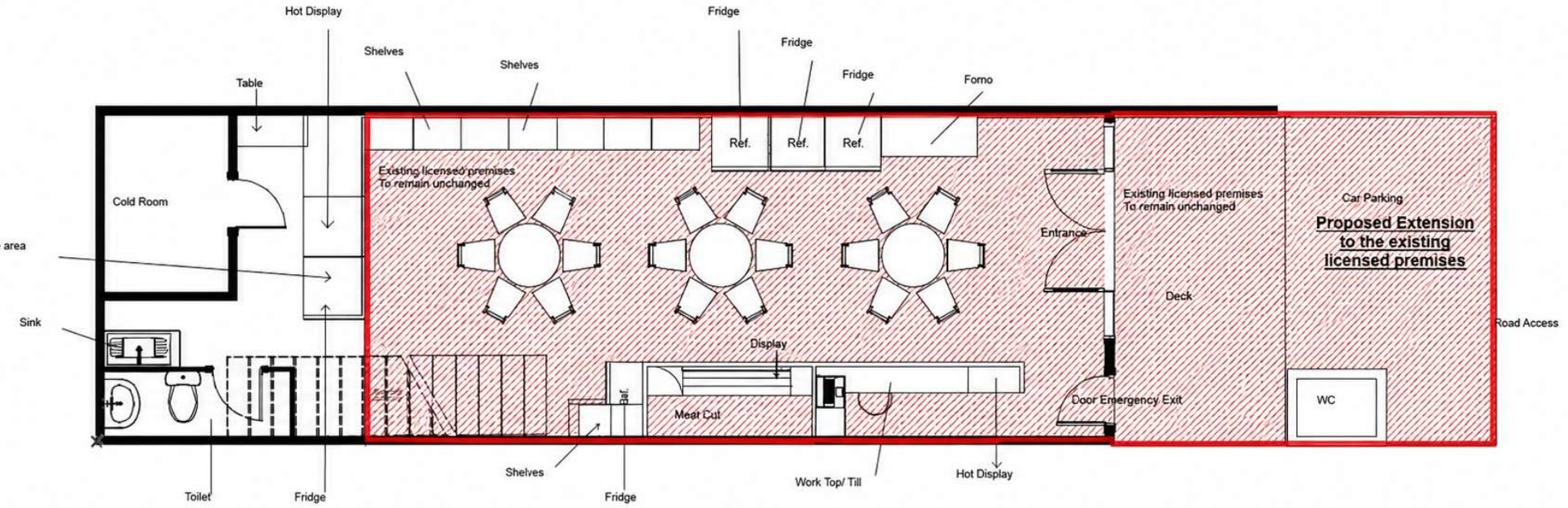
Zebu Butcher's is providing this information voluntarily so that Brent Council has a clear and complete understanding of the proposed operation and the safeguards we intend to have in place.

The premises already operates CCTV, Challenge 25, incident and refusals recording, staff training, responsible alcohol-sales procedures and management oversight. In connection with the variation, the proposed safeguards include a maximum of 25 people in the external customer area, a suitable removable barrier system while the area is in use, staff supervision, separation from vehicle movements, controlled outdoor background music ending at 22:00, monitoring of noise and customer behaviour, and orderly customer dispersal.

Zebu Butcher's remains committed to working constructively and transparently with Brent Council, the Metropolitan Police and neighbouring businesses and welcomes reasonable and proportionate recommendations that may assist in operating the premises safely and responsibly and in promoting the licensing objectives.

Yours faithfully,

Jefferson Kauffmam
Director
Zebu Butcher's Ltd


Hot Display
Shelves
Shelves
Table
Fridge
Fridge
Fridge
Forno
Ref.
Ref.
Ref.
Existing licensed premises
To remain unchanged
Cold Room
Coffee area
Sink
Existing licensed premises
To remain unchanged
Car Parking
Proposed Extension
to the existing
licensed premises
Entrance
Deck
Road Access
Display
Bar
Meat Cut
Door Emergency Exit
WC
Toilet
Fridge
Shelves
Fridge
Work Top/ Till
Hot Display

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METROPOLITAN POLICE

Working together for a safer London

TERRITORIAL POLICING

Zebu Butchers Ltd
38, Sapcote Trading Centre
Willesden.
NW10 2DJ

NW BCU Licensing Department - Brent
Wembley Police Station
603, Harrow Road
Wembley
HA0 2HH
Tel: 07500 087 115
Email: Brendon.McInness@met.police.uk

Your Ref: 39346
Our ref: 01QK/39346/26/1187NW

Date: Thursday 17th of September 2026

Police representations to vary the premises license of 'Zebu Butchers Ltd, 38 Sapcote Trading Centre, Willesden NW10 2DJ'.

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: Brendon McInnes
Licensing Constable 1187NW

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 to vary the premises license under section 34 of the Licensing act 2003. The Police representations are concerned with all four of the licensing objectives.

- 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 vary the existing premises license of Zebu Butchers as follows:

Sale of alcohol extended from 10.00 – 21.00 hours to 10.00 to 00.00 hours seven days a week
Add live, recorded and amplified music from 12.00 to 00.00 hours seven days a week.
Extend the existing exterior licensable area into the service road for the consumption of food and alcohol into the service road.

The venue is a butchers situated on Sapcote Industrial Park just off Dudden Hill Lane, which I have visited on more than one occasion. The main theme is that off a butcher with the option of having an alcoholic drink inside the venue or on the decking immediately outside.

The business plan appears to now be changing from that of a butcher to that of a late-night drinking establishment. I would have expected detailed supporting documents highlighting the change from a restaurant to a late-night bar, but none are attached.

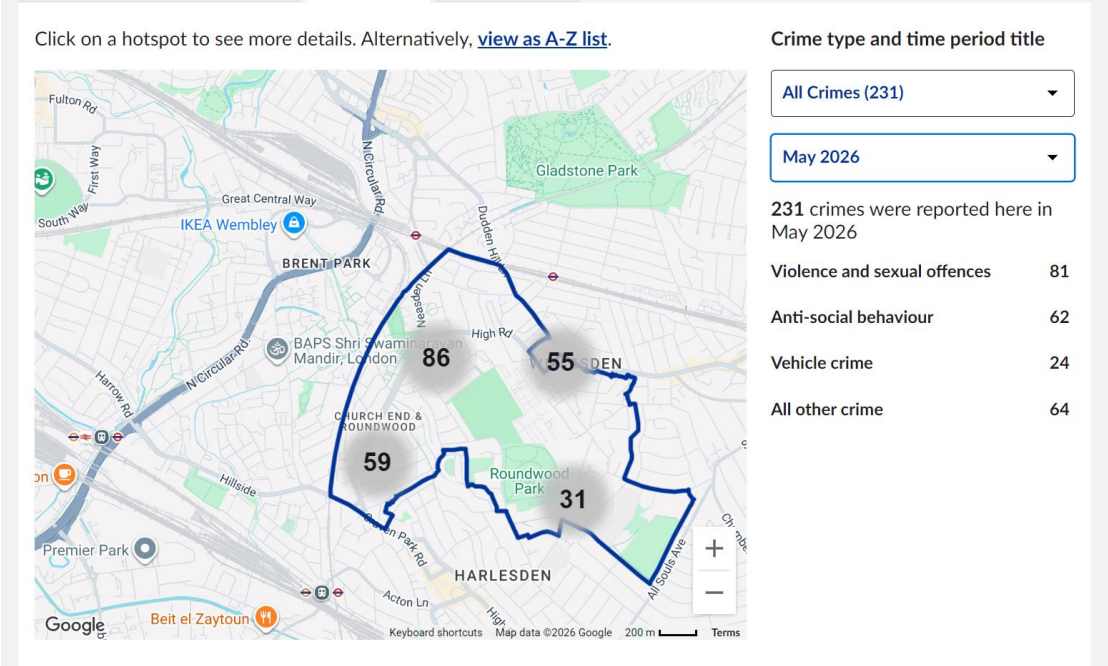
Police Objections

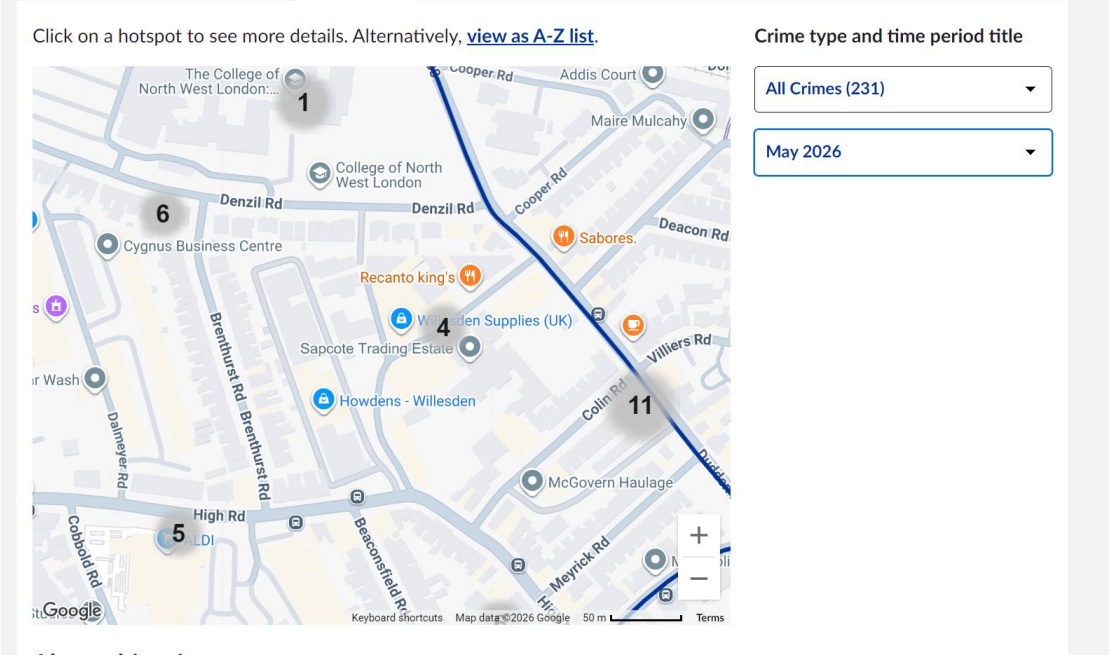
The service road has a series of ASB, crime, drug taking and noise complaints.

The following dates relate to drug dealing taking place in Sapcote Trading Estate. 02/04/2026, 01/06/2026, 28/01/2026 and one crime report for drugs on 27/01/2026

The following incidents have also been recorded by police. Indecent assault on a female 28/04/2025, GBH (stabbing) on 16/11/25, Assault with female punched in face 11/04/2026, Affray (fighting) 27/04/2025 and another affray of females fighting in the car park 13/09/, GBH (victim attacked with a bottle) 06/06/2025, common assault (female attacked) 23/02/2026.

The screen shots below are taken directly from the Met Police web page www.met.police.uk crime figures that are available to the public to view. As you can see, the month of May this year shows a total of 231 crimes reported for this period with violence, sexual offences and anti-social behaviour top of the list. Zooming into the map you can see on the second screen shot a cluster of crimes in Sapcote Trading Estate.





I would have expected a detailed business plan explaining the move from a butcher with a alcohol license to more of a night club establishment. There is no mention of any SIA that would be used to support the licensing objectives. Even though this is service road police have already received noise complaints from neighbours. This is another matter that I would have expected to be addressed by the applicant.

The use of extending the licensable area into the service road needs a detailed explanation on how this is going to work. There is no mention of who the land belongs to, permission given to using this land and the knock-on effects of using this land to other businesses and passing pedestrians and motor vehicles. The entire borough of Brent is subject to a PSPO prohibiting the consumption of alcohol in public places. Again, the use of the service road been used to consume alcohol and the conditions put in place to make sure this doesn't spill onto the public highway have not been addressed.

I note that the applicant has listed two conditions to be removed or amended from the license (conditions 20 and 22) but no new conditions have been recommended to help promote this application or uphold the licensing objectives.

Summary

This is a very weak application that is asking to extend its licensable hours and licensable area into a problematic area. I see no reference to how this variation is going to uphold the licensing objectives. There is no mention of any SIA, crowd control, noise nuisance or a change of business plan.

Taking all the above into account police oppose this application in full regardless of any conditions that could be attached.

Yours Sincerely,

PC Brendon McInnes 1187NW
NW BCU - Brent Licensing
Brendon.McInness@met.police.uk

From: Jefferson Zebu
Sent: 22 September 2026 13:02
To: Brendon.McInness@met.police.uk
Cc: Business Licence; Legister, Linda
Subject: Re: Variation - Zebu Butchers, Unit 38 Sapcote Trading Centre, High Road, NW10 2DJ - 39346 Police representations

Dear PC McInnes,

Please find attached our response to the Metropolitan Police representation concerning the premises licence variation application for Zebu Butcher's, 38 Sapcote Trading Centre, High Road, Willesden, NW10 2DJ.

We have carefully considered the concerns raised in the Police representation and have provided further information regarding the existing management arrangements at the premises, together with the additional safeguards proposed in response to those concerns.

We fully understand the importance of the licensing objectives and the concerns regarding crime and disorder in the wider area. Zebu Butcher's is committed to operating responsibly and to continuing to work constructively with the Metropolitan Police, Brent Council and other local businesses.

In light of the information and safeguards now provided, we would be very grateful if the Metropolitan Police could reconsider its representation and, if you are satisfied that the concerns raised have been sufficiently addressed, consider withdrawing the representation.

We remain very willing to engage constructively with the Metropolitan Police should you wish to discuss any of the matters raised or any reasonable measures that may assist in addressing your concerns.

Thank you very much for taking the time to consider our response.

Kind regards,

Jefferson Kauffmam
Director
Zebu Butcher's Ltd.

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ZEBU BUTCHER'S POLICE RESPONSE

Premises: 38 Sapcote Trading Centre, High Road, Willesden, NW10 2DJ
Police reference: 39346
Application: Premises Licence Variation

1. INTRODUCTION

We respectfully submit this response to the representation made by the Metropolitan Police in relation to the premises licence variation application for Zebu Butcher's, 38 Sapcote Trading Centre, High Road, Willesden, NW10 2DJ. The application seeks a variation of the existing premises licence to extend the licensed area to include the Unit 38 car park; extend the hours for the sale and consumption of alcohol to 10:00-00:00 and the opening hours to 09:00-00:30; add live music indoors from 12:00-00:00; recorded music outdoors from 10:00-22:00; and recorded music indoors from 10:00-00:00, Monday to Sunday. We understand the concerns raised by the Police. We respectfully ask that the application is considered on the basis of the evidence relating specifically to Zebu Butcher's, together with its existing management controls and the additional safeguards proposed for the variation.

2. EXISTING RECORD AND OPERATION

Zebu Butcher's is a family-based business with an existing premises licence. Importantly, we have never had a police incident at our premises. We do not tolerate fighting, disorder, anti-social behaviour, drug-related activity or other inappropriate conduct at or in connection with our premises. We have cooperated fully with Brent Council inspections and have been open and transparent with relevant officers. We respectfully ask that Zebu Butcher's is assessed on its own operating history and on evidence relating specifically to the premises.

3. THE WIDER CRIME PICTURE AND CCTV COOPERATION

We acknowledge the Police information concerning crime and disorder in the wider Sapcote Trading Estate. We understand why the Police wish to ensure that additional licensed activity does not make that situation worse. However, we respectfully ask that incidents elsewhere in the area are not treated as evidence that Zebu Butcher's contributed to them unless there is evidence connecting them to our premises. Zebu Butcher's already maintains and operates CCTV covering relevant internal and external areas, in accordance with its applicable ICO and data protection responsibilities. Relevant staff are trained in its operation and management ensures that the system is maintained in working order. We have cooperated when the Police have requested CCTV footage or information concerning incidents involving neighbouring premises or the surrounding area. We will always be willing, when requested, to provide relevant CCTV footage so that the facts and circumstances of any incident can be properly established. Zebu Butcher's would also welcome continued cooperation between local businesses, Brent Council and the Metropolitan Police in addressing crime and anti-social behaviour in the wider area. We would be willing to participate constructively in appropriate local initiatives or communication arrangements that may assist in improving safety in the Sapcote Trading Estate.

4. NATURE OF THE PROPOSED OPERATION

The proposed variation is not intended to change the current nature of Zebu Butcher's into a nightclub or late-night drinking establishment. The existing table and seating arrangement will remain part of the normal operation of the premises. No dance floor is proposed as part of this variation and no nightclub-style entertainment is proposed. Any live music provided indoors is intended as ancillary entertainment for customers. The purpose of the variation is to allow the existing business to serve customers for longer hours and support increased trade.

5. EXISTING MANAGEMENT CONTROLS

Zebu Butcher's already maintains responsible management practices, including staff training, responsible alcohol sales, refusals where appropriate, Challenge 25, incident recording and management oversight. Zebu Butcher's already maintains an incident log and a refusals log. Staff involved in the sale or supply of alcohol already receive appropriate training covering licensing responsibilities, Challenge 25, identification requirements, refusals, responsible alcohol sales, prevention of disorder, incident recording and relevant premises procedures. Training records are maintained. Zebu Butcher's already operates Challenge 25. Where a customer appears to be under 25, staff request acceptable photographic identification before alcohol is supplied. If there is doubt, the sale is refused.

6. EXTERNAL CUSTOMER AREA

The external customer area will be clearly defined and limited to a maximum of 25 customers at any one time. Whenever it is in use, it will be physically separated from vehicle movements by means of a suitable removable barrier system and will be supervised by staff. The barriers will be put in place whenever the area is being used by customers and will be removed and stored when the area is not in use. The premises has an existing emergency exit located adjacent to the main entrance, which is kept clear and unobstructed. Vehicle circulation routes will also remain unobstructed. Zebu Butcher's would also be happy to follow any recommendations from Brent Council regarding the most appropriate type of barrier or any additional reasonable safety measures for the car park. Under the existing premises licence, the area permitted for the sale and consumption of alcohol extends to the existing deck area, with the current permitted alcohol hours ending at 21:00. The present variation seeks to extend the permitted hours for the sale and consumption of alcohol to 00:00, both indoors and within the licensed external area, and also seeks to extend the licensed external area to include the Unit 38 car park. Zebu Butcher's already ensures that customers do not take alcohol beyond the currently authorised area and staff routinely remind customers of this restriction. Staff will monitor the external customer area to help prevent disorder, excessive noise, littering or other problems.

7. MUSIC AND NOISE

There will be no live music, bands or DJs in the external area. Recorded music outdoors is proposed between 10:00 and 22:00 only and will operate as background music at a controlled volume, ceasing at 22:00. Live music is proposed indoors only between 12:00 and 00:00. Recorded music is proposed indoors between 10:00 and 00:00. Music will be managed so as not to cause nuisance to nearby residents or businesses. The volume will be controlled by management and staff will respond promptly to any reasonable complaint concerning noise.

8. CUSTOMER DISPERSAL

Towards the end of the permitted alcohol and entertainment hours, staff will encourage customers to leave the premises quietly and in an orderly manner, avoid unnecessary congregation and respect neighbouring businesses and residents. Management will take reasonable steps to prevent disorder or anti-social behaviour associated with customers leaving the premises.

9. BRENT PSPO AND AUTHORISED AREA

We recognise the relevance of the Brent Public Spaces Protection Order. Staff understand the distinction between the licensed premises area and public areas outside the authorised boundary. Zebu Butcher's already ensures that customers do not take alcohol beyond the currently authorised area and staff routinely remind customers of this restriction. Zebu Butcher's will continue to cooperate with authorised officers in relation to the PSPO.

10. PUBLIC SAFETY AND PROTECTION OF CHILDREN

The premises is already managed with public safety in mind. The existing emergency exit adjacent to the main entrance is kept clear and unobstructed, staff understand the existing emergency procedures, and the premises is managed so as to avoid unnecessary obstruction or overcrowding. Zebu Butcher's recognises the importance of protecting children from harm and already operates responsible procedures in relation to children and the sale of alcohol. Challenge 25 is already in operation and staff involved in alcohol sales are trained to request acceptable photographic identification where a customer appears to be under 25. Alcohol will not be sold or supplied to anyone under the legal age and, where satisfactory identification cannot be produced, the sale will be refused. Where children are present at the premises, staff routinely remind parents or responsible adults that children should remain with and under the supervision of their parent or responsible adult. This forms part of Zebu Butcher's existing approach to maintaining a safe and family-friendly environment.

11. EXISTING LICENCE CONDITIONS AND ENGAGEMENT WITH THE POLICE

We recognise that the existing premises licence already contains conditions intended to promote the licensing objectives. We are willing to discuss the wording of existing conditions 20 and 22 with the Police and Licensing Authority if updated wording would provide clearer and effective safeguards in light of the proposed variation. Zebu Butcher's wishes to maintain a constructive working relationship with the Police and Licensing Authority and will continue to cooperate with reasonable requests for information relating to licensing matters.

12. ADDITIONAL SAFEGUARDS FOR THE VARIATION

In addition to the existing controls operated by Zebu Butcher’s, the safeguards proposed specifically for the variation include: a maximum of 25 customers in the external customer area; a suitable removable barrier system while that area is in use; staff supervision; the existing emergency exit adjacent to the main entrance kept clear and unobstructed; vehicle circulation routes kept unobstructed; no live music, bands or DJs outdoors; and outdoor recorded music limited to background music at a controlled volume until 22:00.

13. CONCLUSION

We respectfully ask the Licensing Sub-Committee to grant the proposed variation, subject to such reasonable and proportionate conditions as may be agreed with the Police and Licensing Authority. Zebu Butcher’s has never had a police incident at the premises and already operates CCTV, incident and refusals recording, Challenge 25, staff training, responsible alcohol-sales procedures and management oversight. We have also cooperated with requests from the Police for CCTV footage or information. We respectfully ask that the application is assessed on the basis of the record, operation and evidence relating to Zebu Butcher’s. We believe that the proposed variation, together with the existing controls and the additional safeguards set out above, can be managed responsibly and consistently with the licensing objectives. Zebu Butcher’s remains committed to working constructively with the Metropolitan Police, Brent Council and other local businesses, and would welcome appropriate local initiatives or communication arrangements aimed at improving safety and reducing crime and anti-social behaviour in the wider Sapcote Trading Estate.

Yours faithfully,

Jefferson Kauffmam
Director
Zebu Butcher’s Ltd.

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From:
Sent: 16 September 2026 14:04
To: Business Licence <business.licence@brent.gov.uk>
Subject: FORMAL REPRESENTATION AGAINST THE APPLICATION TO VARY PREMISES LICENCE NO. 31765

Dear Licensing Support Officer,

I wish to make a formal representation against the application under Section 34 of the Licensing Act 2003 to vary Premises Licence No. 31765.

REF.: Zebu Butcher, 38 Sapcote Trading Unit, Dollis Hill, NW10 2DJ

I respectfully request that the Licensing Authority refuse the proposed variation in its entirety, or that the application be subject to substantially more restrictive conditions following a full assessment of the impact on the licensing objectives.

My representation is based on the four statutory licensing objectives:

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

These objectives are of equal importance and must be promoted by the Licensing Authority when determining licensing applications.

1. PUBLIC SAFETY

I have serious concerns regarding the proposed extension of the licensed area into the private car parking area belonging to Unit 38.

The proposed external area is situated within an industrial environment and is regularly used by cars, motorcycles, delivery vans and other commercial vehicles.

It is not a pedestrianised area and, in my view, it is not physically suitable for the introduction of tables, chairs and customers consuming food and alcohol while vehicles continue to manoeuvre through the same area.

This creates a foreseeable conflict between pedestrians and vehicles.

The proposed use could expose customers and other members of the public to unnecessary risks, particularly:

- Children;
- Elderly people;
- Disabled people;
- People with reduced mobility;
- Customers who have consumed alcohol; and
- Delivery drivers and other people using the area.

The issue is particularly concerning because the application would significantly increase pedestrian activity in an area that is primarily designed for vehicle access and commercial use.

The Licensing Authority should therefore require the applicant to demonstrate how the proposed outdoor seating area can operate safely while maintaining adequate separation between customers and moving vehicles.

The statutory guidance identifies matters such as safe access, emergency access, capacity and the safety of people leaving premises as relevant considerations under the public safety objective.

I do not believe that the application adequately demonstrates how these risks would be addressed.

2. PROTECTION OF CHILDREN FROM HARM

I am particularly concerned about the potential impact on children.

The proposed external area would place customers, including potentially families with children, in an area where vehicles, motorcycles and delivery vans regularly operate.

There does not appear to be adequate physical separation between pedestrians and vehicle movements.

Children are particularly vulnerable to vehicle movements and may not be able to anticipate the movements of delivery vehicles or motorcycles.

The proposed variation would also introduce late-night alcohol consumption and entertainment into the premises.

I therefore ask the Licensing Authority to consider carefully whether the proposed expansion provides an environment in which children can be adequately protected from physical and other forms of harm.

The statutory guidance makes clear that protection of children from harm includes physical, moral and psychological harm and is not limited solely to underage alcohol sales.

3. PREVENTION OF PUBLIC NUISANCE

I strongly object to the proposed combination of outdoor seating, alcohol consumption, recorded music, live music and significantly extended opening hours.

The application proposes:

- Alcohol sales until 00:00;
- Opening to the public until 00:30;
- Recorded music until 00:00;
- Recorded music in the external area;
- Live music from 12:00 until 00:00; and
- Consumption of alcohol in the external car park.

The cumulative effect of these activities is likely to result in increased noise and disturbance from:

- Customers gathering outside;
- Conversations and shouting;
- Music;
- Customers arriving and leaving;
- Vehicle movements;
- Delivery vehicles;
- Taxis and private vehicles; and
- Late-night activity.

The Government's Section 182 Guidance specifically recognises noise nuisance and the effect of licensed premises on people living and working in the surrounding area as relevant to the prevention of public nuisance objective.

The proposed outdoor area is particularly concerning because it would allow customers to consume alcohol and potentially listen to music in an area that is not designed as a conventional restaurant terrace or entertainment space.

4. LIVE MUSIC

I specifically object to the proposed introduction of live music, both amplified and unamplified, from 12:00 until 00:00 every day.

I do not consider the premises or surrounding area to be appropriate for the operation of a live music venue.

There is also another restaurant directly opposite the premises which already provides live music.

Allowing live music at both premises, particularly potentially until midnight every day of the week, creates a potential cumulative noise impact.

This concern is not simply about whether music is played indoors or outdoors. It is about the combined effect of music, customers, alcohol consumption, people arriving and leaving, and the surrounding commercial activity.

I therefore ask the Licensing Authority to give particular consideration to the cumulative impact of the proposed live music on the surrounding area.

5. RECORDED MUSIC AND OUTDOOR MUSIC

I also object to the proposed recorded music from 10:00 until 00:00.

My concern is particularly strong regarding music audible from the external area.

The Section 182 Guidance specifically recognises that conditions may be appropriate to control noise from premises and refers to measures concerning outdoor areas and the escape of sound.

Given the proposed late operating hours and the combination of live and recorded music, I believe there is a substantial risk of increased noise and disturbance.

6. CRIME AND DISORDER

I object to the proposed extension of alcohol sales until midnight every day of the week, particularly when combined with live music, recorded music and an external drinking area.

The application would substantially increase the period during which alcohol can be purchased and consumed.

It would also increase late-night customer activity and the number of people entering and leaving the premises.

The combination of alcohol, late opening and entertainment can create additional risks of disorder, particularly as customers leave the premises after consuming alcohol.

I therefore ask the Licensing Authority to consider whether the proposed operating hours and activities adequately promote the prevention of crime and disorder.

7. LATE-NIGHT OPENING

I object to the proposal to keep the premises open to the public until 00:30 every day of the week.

This is a significant extension of the operating period.

The proposed closing time should not be considered separately from the proposed alcohol and entertainment hours.

The combined proposal would allow customers to consume alcohol until midnight, listen to live or recorded music until midnight, and remain at the premises until 00:30.

This would substantially increase late-night activity in an industrial area.

8. OUTDOOR ALCOHOL CONSUMPTION

I strongly object to the proposed use of the private car park as an area where customers may sit and consume alcohol.

The area is used by vehicles, motorcycles and delivery vans.

It is not, in my view, a suitable or safe environment for an outdoor drinking area.

There is a significant difference between a purpose-built restaurant terrace and a private industrial car park that continues to be used for vehicle movements.

The applicant should be required to demonstrate how customers would be physically separated from moving vehicles and how pedestrian safety would be maintained.

9. ACCESSIBILITY AND FACILITIES FOR DISABLED PEOPLE

I also have concerns about the suitability of the premises and facilities for disabled customers.

The premises have, for a considerable period, had a chemical toilet, and I am concerned that the existing facilities may not be adequate for the substantially increased customer use proposed by this application.

I am also concerned about whether there are appropriate facilities and arrangements to enable disabled people to access and use the premises and proposed external area safely.

I respectfully ask the Licensing Authority to consider these issues as part of its assessment of the suitability and safe operation of the proposed premises.

10. PLANNING AND THE PHYSICAL SUITABILITY OF THE PREMISES

I also have concerns regarding the planning status and lawful use of the premises.

It is my understanding that there may not be planning permission for the premises to operate as a restaurant in the manner proposed.

I respectfully ask the Licensing Authority to verify the planning position with the relevant Planning Authority, particularly in relation to:

- Restaurant use;
- Outdoor customer seating;
- External consumption of alcohol;
- Live entertainment;
- Increased customer capacity; and
- The proposed intensification of the use of the premises.

I appreciate that planning and licensing are separate regulatory regimes. However, the physical characteristics of the premises and the surrounding area are directly relevant when considering whether the proposed licensable activities can be carried out in a manner that promotes public safety and prevents public nuisance.

11. CUMULATIVE IMPACT OF THE APPLICATION

My objection is not based on any one element of the application in isolation.

The concern is the cumulative effect of the proposed changes.

The application would effectively intensify the premises from a butcher and delicatessen into a substantially larger hospitality and entertainment operation involving:

- Outdoor customer seating;
- Outdoor consumption of alcohol;
- Alcohol sales until midnight;
- Opening until 00:30;
- Recorded music;
- Outdoor music;
- Live music until midnight; and
- Increased pedestrian and vehicle activity.

The surrounding area is an industrial environment rather than a pedestrianised restaurant or entertainment district.

The Licensing Authority should therefore assess the application based on the likely real-world impact of all these activities operating together.

12. REQUEST FOR REFUSAL

For all the reasons set out above, I respectfully request that the Licensing Authority **REFUSE THE APPLICATION TO VARY PREMISES LICENCE NO. 31765 IN ITS ENTIRETY**.

In particular, I ask the Licensing Authority to refuse:

1. The extension of the licensed area into the private car parking area;
2. Outdoor seating and consumption of alcohol;
3. Alcohol sales until 00:00;
4. Opening hours until 00:30;
5. Outdoor recorded music;
6. Recorded music until 00:00;
7. Live music until 00:00; and
8. The proposed overall intensification of the premises.

If the Licensing Authority is nevertheless minded to grant any part of the application, I respectfully request that a hearing be held and that robust conditions be considered to address the identified risks, including conditions relating to outdoor customer areas, vehicle/pedestrian separation, noise, music, closing times, alcohol consumption and the safe operation of the premises.

CONCLUSION

I respectfully submit that the proposed variation represents a substantial intensification of the use of the premises which is not appropriate for the physical characteristics of the site and surrounding industrial area.

The proposed external drinking area would introduce pedestrians and customers into an area used by vehicles, motorcycles and delivery vans.

The proposed late-night alcohol sales, outdoor drinking, live music and recorded music would also create a significant potential for increased noise, disturbance and disorder.

There are additional concerns regarding the adequacy of the premises' facilities, including accessibility and toilet provision, and concerns regarding whether the proposed use is consistent with the planning status of the premises.

For these reasons, I respectfully ask the Licensing Authority to refuse the application in order to promote the four licensing objectives and protect public safety, local amenity and children from harm.

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RESPONSE TO REPRESENTATION

Application to Vary Premises Licence No. 31765

Zebu Butcher's

Dear Licensing Support Officer,

Re: Premises Licence No. 31765 - Zebu Butcher's, 38 Sapcote Trading Unit, Dollis Hill, NW10 2DJ

We write in response to the formal representation submitted to Brent Council on 16 September 2026 concerning the application to vary Premises Licence No. 31765.

We have carefully considered the matters raised in the representation, including the concerns expressed in relation to the four licensing objectives. Our response to those matters is set out below.

We respectfully request that the Licensing Authority consider the application on its own merits, having regard to the proposed variation, the operation and management of Zebu Butcher's, the evidence relevant to the licensing objectives and the applicable licensing framework.

1. PUBLIC SAFETY - PRIVATE CAR PARK

The private car park may, from time to time, be used as part of the external customer area with tables and chairs.

Whenever the area is in use by customers, it will be appropriately isolated from vehicle movements and supervised by staff. The car park is private and is already controlled using cones, allowing the area to be safely managed when in use by customers.

We respectfully submit that the concerns raised can therefore be appropriately addressed through responsible management and proportionate controls and do not, in themselves, justify refusal of the variation.

2. PROTECTION OF CHILDREN FROM HARM

Zebu Butcher's is a family-oriented business and the protection of children is taken seriously. The external customer area will be supervised by staff, with appropriate measures in place to manage the interaction between customers and vehicles. Children attending the premises remain under the supervision of their parents or responsible adults. We consider that the concerns raised can be appropriately addressed through sensible management controls and proportionate conditions and do not, in themselves, justify refusal of the variation.

3. PREVENTION OF PUBLIC NUISANCE

The external area will be appropriately managed and supervised by staff, with reasonable measures taken to prevent unreasonable noise or disturbance. The representation also refers generally to taxis, private vehicles, vehicle movements and people arriving and leaving. The surrounding area contains other independently operated businesses, including premises operating later hours. Furthermore, to the extent that such activity takes place on the public highway, it is not under the direct control of Zebu Butcher's and cannot automatically be attributed to our premises. The variation proposes a defined closing time of 12:30 a.m. Activity, noise or vehicle movements occurring in the surrounding area after Zebu Butcher's has closed, and which are unrelated to our premises, cannot reasonably be attributed to our operation. We respectfully submit that general or speculative concerns regarding potential noise do not, in themselves, establish that the proposed variation will undermine the prevention of public nuisance objective.

4. LIVE MUSIC AND THE PREMISES OPPOSITE

The representation itself refers to another restaurant directly opposite Zebu Butcher's which already provides live music and relies upon the existence of that operation as part of its cumulative noise argument. For the avoidance of doubt as to the premises being referred to, the establishment directly opposite Zebu Butcher's, at Unit 25 Sapcote Trading Centre, 374 High Road, London, NW10 2DH, is associated with Restaurant Bar Simprao Ltd, while Brent Council licensing records identify the premises as Recanto Kings. References below to Recanto Kings / Restaurant Bar Simprao concern those same premises directly opposite Zebu Butcher's. As the representation itself has introduced the premises directly opposite Zebu Butcher's and its live music operation as part of the alleged cumulative impact, it is important that the operation and management of the two businesses are not conflated. Recanto Kings / Restaurant Bar Simprao and Zebu Butcher's are independently operated premises, under separate management and with their own distinct operating practices, customer profiles and licensing histories. The manner in which the premises opposite has been managed, and any incidents or regulatory matters associated with it, should not be treated as evidence of how Zebu Butcher's is or will be managed. Zebu Butcher's is a food-led, family-oriented business which also operates as a butcher and grocery/retail food shop. Its nature, management, customer profile and manner of operation are materially different from those of the premises opposite. Zebu Butcher's does not intend to operate as an uncontrolled late-night entertainment venue. There is also a material distinction between the regulatory and licensing histories of the two premises. Publicly available Brent Council records concerning Recanto Kings / Restaurant Bar Simprao demonstrate previous regulatory and licensing involvement by the relevant authorities. Brent Council's public records also show that the premises has been the subject of a premises licence review brought by Home Office Immigration Enforcement. Previous complaints concerning Zebu Butcher's have resulted in visits and enquiries by Brent Council. To our knowledge, those visits and enquiries have not identified breaches by Zebu Butcher's in relation to the matters complained of. Zebu Butcher's has always sought to maintain a positive and respectful relationship with neighbouring businesses, including the premises directly opposite which has been referred to in the representation. As at the date of this response, Zebu Butcher's has not made any complaint or report against those premises, or against other neighbouring businesses, to Brent Council, the Metropolitan Police or any other

authority. We mention the premises opposite only because the representation itself has introduced its operation as part of the cumulative impact argument. The existence of live music at both premises does not make their operations equivalent. Nor should the characteristics, incidents, regulatory history or management of the premises opposite be attributed to Zebu Butcher's. If the premises opposite is relied upon as part of the cumulative impact argument, the distinction between the two independently managed businesses must equally be recognised. Accordingly, Zebu Butcher's should be assessed on the basis of its own proposed operation, its own management and its own licensing history. The application should be determined by reference to Zebu Butcher's own circumstances and the evidence relevant to the licensing objectives.

5. RECORDED MUSIC AND OUTDOOR MUSIC

The proposed hours for recorded music are those set out in the variation application and will be determined by the Licensing Authority. The concerns raised regarding potential noise nuisance associated with the external area have already been addressed under Section 3 above. Any music associated with the premises will be appropriately managed, with reasonable measures taken to prevent unreasonable noise or disturbance. We respectfully submit that the concerns raised can be appropriately addressed through responsible management and, where considered appropriate by the Licensing Authority, proportionate conditions, rather than requiring refusal of the variation.

6. PREVENTION OF CRIME AND DISORDER

The concerns raised under this section relate principally to the potential for disorder arising from the proposed hours and activities. Zebu Butcher's is a food-led, family-oriented business and will continue to be responsibly managed, with appropriate measures taken to prevent and address disorder should any issue arise. The proposed hours for the sale of alcohol are those set out in the variation application and will be determined by the Licensing Authority. We respectfully submit that the proposed variation should be assessed by reference to the actual operation and management of Zebu Butcher's and the evidence relating to the premises, rather than on the assumption that extended hours or the availability of alcohol will, in themselves, result in crime or disorder.

7. LATE-NIGHT OPENING

The representation objects to the proposed closing time of 12:30 a.m. and appears to treat the closing time of the premises and the hours for licensable activities as if they were the same. They are not. The hours during which premises are open to the public are distinct from the hours authorised for individual licensable activities. Zebu Butcher's also operates as a butcher and grocery/retail food shop, in addition to its other activities. Accordingly, the fact that the premises may remain open until 12:30 a.m. does not, in itself, mean that the sale of alcohol, regulated entertainment or any other licensable activity will continue throughout that entire period. The hours sought for those activities are separately identified in the variation application. This distinction is reflected in the statutory licensing framework, which separately identifies licensable activities and the other hours during which premises may be open to the public. We respectfully submit that the proposed closing time should therefore be considered in the context of the actual nature and operation of Zebu Butcher's and should not, in itself, be treated as evidence of likely nuisance or disorder.

8. OUTDOOR ALCOHOL CONSUMPTION

The representation raises concerns regarding the consumption of alcohol within the external area forming part of the private car park. As already addressed under Section 1 above, whenever the external area is in use by customers, it will be appropriately isolated from vehicle movements and supervised by staff. The fact that the area forms part of a private car park does not, in itself, establish that it cannot be safely and appropriately managed as an external customer area. Any consumption of alcohol in that area will be subject to the terms of the premises licence. We respectfully submit that the concerns raised do not, in themselves, justify refusal of the variation.

9. ACCESSIBILITY AND TOILET FACILITIES

The representation raises matters concerning accessibility and toilet facilities. Those matters must be considered within the appropriate regulatory context. Accessibility, building requirements and toilet provision may engage regulatory regimes separate from the licensing process, depending upon the particular circumstances and applicable legal requirements. Zebu Butcher's will comply with applicable legal requirements and cooperate with the relevant authorities where

appropriate. For the purposes of the present application, we respectfully submit that the Licensing Authority should determine the variation sought by reference to its likely effect upon the licensing objectives and should avoid treating matters governed by separate regulatory regimes as, without more, a basis for refusing the variation.

10. PLANNING

The representation itself acknowledges that planning and licensing are separate regulatory regimes. Accordingly, the present application should be determined under the Licensing Act 2003 by reference to the variation sought and its effect upon the promotion of the licensing objectives.

11. CUMULATIVE IMPACT OF THE APPLICATION

We acknowledge the representation's argument that the application should be considered as a whole rather than each proposed change being considered in isolation. We agree that the overall operation should be considered. However, considering the application as a whole does not mean simply adding together each potential concern identified in the representation and treating the combined concerns as established harm. The relevant question is the likely effect of the proposed variation when considered in the context of the actual nature, management and operation of Zebu Butcher's and the measures in place to promote the licensing objectives. The representation characterises the application as an intensification from a butcher/deli into a larger hospitality and entertainment operation. That description does not fully reflect the nature of the business. Zebu Butcher's will continue to operate as a butcher and grocery/retail food shop alongside its food-led and hospitality activities. The proposed variation does not, in itself, transform the premises into an uncontrolled late-night drinking or entertainment venue. The representation identifies a number of potential concerns relating to the external area, alcohol, music, opening hours, noise, public safety and crime and disorder. Those matters have been addressed individually above. When considered together, they should still be assessed by reference to the actual proposed operation and the evidence relevant to the licensing objectives, rather than on the assumption that each potential risk will necessarily materialise and combine to produce the harm alleged. The representation also relies upon the existence of another premises directly opposite which provides live music. As addressed under Section 4 above,

Recanto Kings / Restaurant Bar Simprao and Zebu Butcher's are independently operated businesses under separate management, with different operating practices, customer profiles and licensing histories. The operation, management, incidents or regulatory history of the premises opposite should not be attributed to Zebu Butcher's when assessing the cumulative effect of this application. Zebu Butcher's has always wished to maintain a positive and respectful relationship with neighbouring businesses. However, incidents or regulatory concerns arising from the operation of another independently managed premises should not create a presumption against a separate business seeking to operate responsibly and obtain the appropriate authorisations for its own premises. Each business should be assessed on its own conduct, management, operating arrangements and licensing history. Zebu Butcher's should not be disadvantaged because incidents have occurred at, or regulatory concerns have arisen in relation to, another independently operated premises in the same area. It is important to distinguish between identifying a potential risk and establishing that the proposed operation is likely to undermine one or more of the licensing objectives. The existence of several potential concerns does not, merely by their number, establish cumulative harm. We respectfully submit that the application should therefore be considered as a whole, but on its own merits, by reference to the actual variation sought, the nature and operation of Zebu Butcher's, its management and the evidence relevant to the licensing objectives.

12. REQUEST FOR REFUSAL

The representation requests that the variation be refused in its entirety and specifically seeks refusal of eight identified elements of the application, including the proposed external area, outdoor seating and alcohol consumption, the proposed alcohol hours, opening hours, recorded music, live music and what is described as the overall "intensification" of the premises. Each of those matters has been addressed in the relevant sections of this response. We respectfully submit that the fact that the representation seeks refusal of each individual element does not, in itself, establish that those elements, either individually or collectively, will undermine the licensing objectives. We respectfully submit that refusal of the variation in its entirety would be disproportionate where specific and identifiable concerns can appropriately be addressed through proportionate and enforceable licensing conditions. The concerns raised in the representation must be considered by reference to the actual variation sought, the manner in which Zebu Butcher's operates and the evidence relevant to the licensing objectives. The number of potential concerns raised does not, by itself, establish that the proposed variation will result in the harm alleged or that refusal of the application in full is necessary. Zebu Butcher's should be assessed by reference to its own operation, management and licensing history. As set out above, concerns, incidents or regulatory matters associated with other independently operated premises should not be attributed to Zebu Butcher's or used as a substitute for evidence concerning Zebu Butcher's itself. Zebu Butcher's has consistently cooperated with Brent Council whenever concerns have been raised, including facilitating visits and responding to enquiries concerning the premises. To our knowledge, those visits and enquiries have not identified breaches by Zebu Butcher's in relation to the matters complained of. Zebu Butcher's has also sought to respond appropriately to matters raised by Brent Council and to cooperate with any reasonable requirements or guidance communicated by the relevant authorities. That history of cooperation is relevant when considering the manner in which the premises is managed and the applicant's continuing commitment to working constructively with the Licensing Authority and the responsible authorities. The representation alternatively requests that, if the Licensing Authority is minded to grant any part of the application, robust and enforceable conditions should be considered. The Licensing Authority has the ability to determine what measures, if any, are appropriate and proportionate for the promotion of the licensing objectives. Where a specific and identifiable

concern can appropriately be addressed through a proportionate and enforceable condition, that provides an available regulatory means of addressing that concern without necessarily requiring refusal of the relevant part of the application or of the variation in its entirety. Zebu Butcher's remains willing to cooperate constructively with the Licensing Authority and the responsible authorities in relation to any specific licensing concerns identified through the proper licensing process. For the reasons set out throughout this response, we respectfully submit that the representation does not establish that refusal of the eight identified elements, or refusal of the variation in its entirety, is necessary or proportionate. We therefore respectfully request that the Licensing Authority determine each aspect of the application on its own merits, by reference to the variation actually sought, the evidence relevant to the licensing objectives and the individual circumstances, operation, management and licensing history of Zebu Butcher's.

CONCLUSION

We have carefully considered and responded to each of the matters raised in the representation. The representation concludes by characterising the proposed variation as a "substantial intensification" which is said to be inappropriate for the physical characteristics of the site and the surrounding industrial area. We respectfully submit that neither that characterisation nor the general description of the surrounding area establishes, without evidence relating to the proposed operation, that the variation will undermine any of the licensing objectives. The industrial character of the surrounding area is a relevant feature of the locality, but it is not, in itself, a basis for concluding that the proposed variation is inappropriate. Its relevance must be assessed in the context of the particular premises, the activities proposed, the actual characteristics of the locality and the likely impact of those activities upon the licensing objectives. Zebu Butcher's will continue to operate as a butcher and grocery/retail food shop alongside its food-led and hospitality activities. The application should therefore be considered by reference to what is actually proposed, how the premises is actually operated and managed, and the evidence relevant to the licensing objectives, rather than by attaching a general characterisation to the premises or the surrounding area. If the application is considered cumulatively, that assessment should consider the operation as a whole. This includes not only the potential concerns identified in the representation, but also the manner in which the premises is managed, the measures available to promote the licensing objectives and Zebu Butcher's history of cooperation with Brent Council and the responsible authorities. The concerns repeated in the representation's conclusion concerning the external area, vehicles and pedestrians, alcohol, music, noise, public safety, crime and disorder, accessibility, toilet facilities and planning have each been addressed in the relevant sections above. Repeating those concerns collectively does not, without supporting evidence, establish that the proposed variation will undermine the licensing objectives. Zebu Butcher's has consistently cooperated with Brent Council when concerns have been raised and has sought to respond appropriately to matters brought to its attention. To our knowledge, visits and enquiries arising from previous complaints have not identified breaches by Zebu Butcher's in relation to the matters complained of. We fully recognise the importance of the four licensing objectives and remain committed to the responsible management of the premises and to constructive cooperation with

the Licensing Authority and the responsible authorities. Where a specific concern is identified, the Licensing Authority has the ability to consider what measures, if any, are appropriate and proportionate to address that concern. We respectfully submit that potential concerns should be assessed according to the evidence relating to them and their relevance to the licensing objectives, rather than being treated collectively as sufficient reason, without more, to refuse the entire variation. Zebu Butcher's respectfully asks to be assessed on its own operation, management, conduct and licensing history. Matters arising from independently operated neighbouring premises should not be attributed to Zebu Butcher's, nor should the existence of other activity in the surrounding area create a presumption against this application. This approach is consistent with the statutory guidance issued under section 182 of the Licensing Act 2003 which was in force at the time this variation application was made, as well as Brent Council's Statement of Licensing Policy 2025-2030. The applicable Section 182 Guidance expressly provides that "each application must be considered on its own merits". It further provides that conditions attached to licences and certificates must be tailored to the individual type, location and characteristics of the premises and events concerned. The Guidance explains that this individualised approach is important in order to avoid the imposition of disproportionate and overly burdensome conditions where there is no need for them. It also provides that licensing conditions should be proportionate, justifiable and capable of being met. Brent Council's Statement of Licensing Policy 2025-2030 reflects the same individualised approach. It provides that each application submitted to the Licensing Authority is to be judged on its own merits and states that there is no "one-size-fits-all" approach. It further recognises the importance of finding the appropriate balance between promoting the four licensing objectives and implementing conditions that properly fit the particular business model. Those principles are particularly relevant in the present case. The representation seeks refusal of multiple individual elements of the proposed variation and ultimately requests refusal of the application in its entirety. The breadth of that objection does not alter the requirement for the application to be assessed on its own merits, having regard to the individual circumstances of Zebu Butcher's and the promotion of the licensing objectives. Accordingly, the concerns raised should be assessed by reference to the evidence relating to Zebu Butcher's itself and to the actual nature, management and proposed operation of these premises. General assumptions arising from the surrounding area, or matters concerning the

operation, incidents or regulatory history of independently managed neighbouring premises, should not be treated as a substitute for that individual assessment. For all of the reasons set out in this response, we respectfully request that the Licensing Authority determine the application on its own merits, having regard to the actual variation sought, the nature and operation of Zebu Butcher's, its management and licensing history, the evidence relevant to the promotion of the four licensing objectives, the applicable statutory guidance issued under section 182 of the Licensing Act 2003 and Brent Council's Statement of Licensing Policy.

Yours faithfully,

From:
Sent: 21 September 2026 11:35
To: Business Licence <business.licence@brent.gov.uk>
Subject: Re: FORMAL REPRESENTATION AGAINST THE APPLICATION TO VARY PREMISES LICENCE NO. 31765

Dear Licensing Authority,

Re: Premises Licence No. 31765 – Zebu Butcher's, 38 Sapcote Trading Unit, Dollis Hill, NW10 2DJ
Further Relevant Representation – Request for Refusal of the Proposed Variation

I write further to the applicant's response to my representation and respectfully ask the Licensing Authority to take the following matters into account when determining this application.

I would first like to clarify that **my restaurant is now under new management/direction**. I therefore respectfully submit that I should not be held responsible for incidents, complaints, alleged breaches or regulatory matters which may have occurred **before I took over the management and operation of the premises**.

Since taking over the restaurant, **I am not aware of any incidents, breaches or enforcement matters relating to my management of the premises**. I have sought to operate responsibly and to maintain a constructive relationship with Brent Council, the Licensing Authority, the police and other relevant authorities.

If any historical matter concerning my premises is relied upon in determining the present application, I respectfully request that the Licensing Authority establish the date of the matter, who was responsible for the premises at that time, whether any breach was actually established, whether enforcement action was taken, and whether that historical matter has any evidential relevance to the premises as it is currently operated under my management.

I respectfully ask that the present application therefore be assessed on the basis of the **current management, current operation and current evidence**, rather than attributing historical matters predating my management to me or to the way in which I currently operate the restaurant.

My representation is made in relation to the four statutory licensing objectives under the Licensing Act 2003, namely:

1. the prevention of crime and disorder;
2. public safety;

3. the prevention of public nuisance; and
4. the protection of children from harm.

The Licensing Authority is required to carry out its licensing functions with a view to promoting these objectives.

1. The proposed external area and alcohol service

A particularly important issue is the proposed use of the private car park as an external customer area, including the proposed consumption of alcohol.

My understanding is that **my own premises licence does not authorise me to use the outside/car-park area for the service of alcohol**, and I therefore ask the Licensing Authority to clarify the legal and licensing basis upon which the proposed external alcohol area for Zebu is being considered.

I am not asking the Licensing Authority to determine this application based on commercial competition. My concern is one of **consistent application of the Licensing Act 2003 and public safety**.

If two directly facing premises are operating in the same physical environment, with customers and vehicles using the same surrounding area, the Licensing Authority should carefully consider whether the proposed external drinking area creates additional risks and whether those risks can realistically be controlled.

2. Public safety – the car park is not a conventional pedestrian terrace

The proposed outside area is a **vehicle car park within a trading/industrial environment**, rather than a purpose-built pedestrianised restaurant terrace.

This is particularly concerning because vehicles use the area and, especially at weekends, vehicles can travel through the area at significant speed.

Introducing customers who may be consuming alcohol into an area where vehicles are manoeuvring creates an obvious need for proper separation between pedestrians and vehicles.

The applicant refers to cones and staff supervision. However, I respectfully submit that general assurances are not sufficient by themselves.

Before granting the variation, I ask the Licensing Authority to require clear evidence addressing, amongst other matters:

- the exact dimensions and boundaries of the proposed external customer area;
- the maximum number of customers permitted outside;
- how pedestrians will be physically separated from moving vehicles;

- how vehicles entering and leaving the car park will be controlled;
- how deliveries and loading/unloading will be managed while customers are outside;
- how emergency vehicle access will be maintained;
- how children, elderly persons and persons with reduced mobility will be protected;
- what level of staff supervision will be provided and during which hours;
- what will happen when customers consume alcohol outside and vehicles are simultaneously moving through the area.

The current proposal should therefore not be treated simply as an ordinary outdoor seating area.

The statutory guidance recognises public safety as one of the licensing objectives and makes clear that licensing authorities must consider the particular circumstances of the premises and the activities proposed.

3. Risk of incidents involving customers from the neighbouring premises

I also wish to clarify an important practical concern.

The applicant states that incidents or behaviour associated with the neighbouring premises should not be attributed to Zebu. I agree that one premises should not automatically be held responsible for another premises' conduct.

However, that is not the point I am making.

The two premises are directly opposite one another and their customers will be using the same surrounding physical environment.

If an altercation occurs in or immediately around Zebu involving persons who have also attended the neighbouring premises, the Licensing Authority should consider how the incident would be managed and how responsibility would be established.

For example, if customers move between the two premises, or if an argument begins at one premises and continues into the shared external environment, this can create a real issue of **crime and disorder and public safety**, regardless of which business originally served the individuals involved.

I therefore ask the Licensing Authority to consider whether the applicant has provided adequate arrangements for:

- preventing disorder;
- identifying and dealing with intoxicated customers;

- refusing further alcohol where appropriate;
- dealing with confrontational behaviour;
- recording incidents;
- contacting the police where necessary;
- supervising customers leaving the premises;
- preventing disputes from developing in the external area.

These are practical licensing considerations and should not be dismissed simply because another premises is independently operated.

4. The proximity of the two premises is relevant to the assessment

I am not asking the Licensing Authority to impose responsibility on Zebu for the independent operation of another business.

However, the physical proximity of the premises is relevant when assessing the **actual environment in which the proposed licence would operate**.

The applicant proposes:

- outdoor customer use;
- outdoor consumption of alcohol;
- recorded music;
- live music;
- alcohol sales until midnight; and
- opening to the public until 00:30.

These activities have the potential to increase the number of people outside, the length of time customers remain in the area and the level of pedestrian and vehicle interaction.

The Licensing Authority should therefore consider the combined effect of these matters rather than considering each proposal in isolation.

5. Public nuisance and noise

The applicant characterises my concerns regarding noise as speculative.

I respectfully disagree.

My concerns relate directly to the activities actually proposed in the application, including:

- live music until 00:00;

- recorded music until 00:00;
- recorded music in the external area;
- outdoor consumption of alcohol;
- alcohol sales until 00:00; and
- customer activity continuing until 00:30.

These are not hypothetical activities. They are elements of the variation being sought.

The current Section 182 guidance recognises that public nuisance can include adverse effects on the environment and amenity of people living and working in the area. It also specifically identifies measures that may be appropriate for controlling noise from licensed premises and external areas.

Accordingly, the Licensing Authority should consider the cumulative effect of music, customers, alcohol, vehicle movements, arrivals, departures and late-night activity.

6. Live music and the surrounding environment

I recognise that the applicant is not responsible for the independent operation of the neighbouring premises.

Nevertheless, where two premises are directly facing each other, the existence of activity from the neighbouring premises can be relevant to understanding the **existing acoustic and operational environment**.

My objection is therefore not that the neighbouring premises' conduct should automatically be attributed to Zebu.

Rather, the question is whether adding further live music, recorded music, outdoor activity and late-night customer movement at Zebu would increase the overall level of disturbance in this particular location.

That assessment should be based on evidence and the actual characteristics of the site.

7. Children and vulnerable members of the public

The applicant refers to the premises being family-oriented and to parents supervising their children.

Parental supervision does not remove the responsibility to consider the physical safety of the premises.

The proposed external area would place customers, potentially including children, in an environment where vehicles can manoeuvre.

The Licensing Authority should therefore consider whether the proposed layout and management arrangements adequately protect children and other vulnerable members of the public from foreseeable physical risks.

8. Conditions should not be assumed to solve every risk

I note the applicant's repeated suggestion that any concerns could simply be dealt with by conditions.

I respectfully ask the Licensing Authority not to assume that conditions will necessarily provide an adequate remedy.

Conditions must be **clear, enforceable, practical and capable of promoting the licensing objectives**.

If the fundamental problem is the interaction between an alcohol-consuming external area and moving vehicles, for example, a general condition requiring staff to "supervise" the area may not adequately remove the underlying risk.

The Authority should first determine whether the proposed variation itself is appropriate having regard to the licensing objectives.

9. Planning and licensing

I acknowledge that planning and licensing are separate regulatory regimes.

I am not asking the Licensing Authority to determine a planning application through the licensing process.

However, the physical use of the premises, the proposed external area, customer capacity, access arrangements and the actual layout of the site are relevant factual matters when considering public safety and public nuisance.

I therefore ask that the Authority ensure that the proposed licensed activities are clearly understood and that there is no uncertainty regarding the lawful use and physical arrangement of the external area.

10. Cumulative effect of the proposed variation

The applicant asks that each element be considered separately.

I respectfully submit that this would not provide a complete assessment of the licensing objectives.

The Licensing Authority should consider the **combined effect** of:

- an external customer area;
- outdoor alcohol consumption;

- alcohol sales until 00:00;
- live music until 00:00;
- recorded music until 00:00;
- outdoor recorded music;
- opening to customers until 00:30;
- increased pedestrian activity;
- increased vehicle interaction; and
- the close proximity of another licensed premises.

Brent's current Licensing Policy recognises that cumulative impact can arise outside designated Cumulative Impact Policy areas and that evidence concerning the particular area and premises can be relevant.

I therefore ask the Authority to assess the variation as a whole and not merely as a collection of isolated amendments.

11. Request for refusal

For the reasons above, I respectfully request that the Licensing Authority **refuse the proposed variation**, particularly the elements which would introduce or materially increase:

1. the use of the external/car-park area by customers;
2. outdoor consumption of alcohol;
3. alcohol sales until 00:00;
4. opening to customers until 00:30;
5. recorded music outdoors;
6. recorded music until 00:00;
7. live music until 00:00; and
8. the overall intensification of the premises from a primarily butcher/food retail operation into a substantially more intensive hospitality, alcohol and entertainment use.

My request is based on the licensing objectives and the specific characteristics of the site, particularly the interaction between pedestrians, customers consuming alcohol and vehicles using the car park.

If the Licensing Authority is nevertheless minded to grant the variation, I respectfully request that the matter be determined at a hearing and that the applicant be required to provide clear and sufficiently detailed evidence addressing the public safety, crime and disorder, public nuisance and protection of children issues identified above.

I also respectfully request that the Authority provide clear reasons for its decision, including how it has considered the proposed external alcohol area, vehicle movements, the proximity of the neighbouring premises and the cumulative effect of the proposed licensable activities.

Thank you for considering this further representation.

RESTAURANT BAR SIMPRAO LTD
Trading as Recanto Kings

FORMAL OBJECTION TO THE APPLICATION TO VARY THE PREMISES LICENCE – ZEBU BUTCHERS LTD

Dear Ms de Farias Jimeno,

Re: Application to Vary the Premises Licence of Zebu Butchers Ltd – Licensing Act 2003

I write on behalf of Bar Restaurant Simprao Ltd, trading as Recanto Kings, in response to your correspondence concerning our representations against the proposed variation of Zebu Butchers Ltd's premises licence.

Having carefully considered the contents of your letter, we wish to make our position unequivocally clear: we will maintain our representations in full and will not withdraw any of the concerns previously submitted to Brent Council.

Your letter does not adequately resolve the substantive concerns raised regarding the proposed variation, particularly the extension of the licensed area into the private car park, the consumption of alcohol outdoors, noise, music, public safety and the potential impact on neighbouring businesses and members of the public.

1. Our right to make representations under the Licensing Act 2003
Your letter devotes considerable attention to alleged historical incidents, regulatory matters and aspects of the operation of our establishment. We consider that this approach diverts attention from the actual subject of the licensing application.

Any historical matters concerning our business that have already been dealt with through the appropriate legal or regulatory procedures must be considered in their proper context. The existence of previous investigations, proceedings or regulatory involvement does not automatically invalidate our right to make representations against a separate premises licence application.

The Licensing Act 2003 does not impose a general prohibition preventing a business from making representations because of its past history. The relevant question is whether the representations are relevant to the application and the promotion of the licensing objectives.

Our representations concern the proposed licensed activities at Zebu Butchers and their potential consequences. They are not an attempt to make Zebu Butchers responsible for matters relating to our own business.

We therefore reject any suggestion that our representations should be withdrawn or given less weight merely because you allege that matters concerning our establishment undermine our credibility.

2. Allegations concerning our business and our representative

Your letter makes a number of serious assertions concerning the credibility, conduct and alleged history of our establishment. It also suggests that these matters may undermine the weight to be given to our representations.

We do not accept that such assertions, without proper consideration of their relevance and supporting evidence, provide a legitimate basis for dismissing our concerns.

If you intend to rely on particular documents, incidents or findings, we expect those matters to be identified specifically and their relevance to the present licensing application to be explained.

We also consider it inappropriate to introduce allegations concerning the personal history of our representative as a means of discrediting the representations made on behalf of our company. Any alleged personal matters must be relevant to the issues under consideration and supported by appropriate evidence before they can fairly be relied upon.

We have not sought to prevent Zebu Butchers from pursuing its business because of allegations concerning its representatives or their personal circumstances. We expect the same principle of fairness to apply to us.

Our objection is based on the potential consequences of the proposed licence variation, not on personal hostility towards you, your client or its business.

3. The proposed extension into the car park remains a substantive concern
Your letter expressly confirms that Zebu Butchers intends to pursue the extension of its licensed area into the private car park serving Unit 38.

This confirmation does not resolve our concerns. On the contrary, it confirms that the proposed external area remains a central issue requiring proper determination by the Licensing Authority.

The proposed area is intended to accommodate customer seating and the consumption of food and alcohol. Your letter also acknowledges that the area may be used only during busier periods and that a fence, trained staff and potentially security personnel are proposed.

However, we require clarity regarding how these arrangements will operate in practice.

In particular, the Licensing Authority should consider:

The precise hours during which the external area may be used.

Whether alcohol may be consumed in the external area and during which authorised hours.

How the area will be supervised and how access will be controlled.

How the safety of children and pedestrians will be protected in relation to vehicle movements and the surrounding road.

How customers will be prevented from carrying alcohol or glass containers beyond

the authorised area.

How noise and disturbance will be controlled, particularly during busy periods and when customers leave.

Whether the proposed fencing and staffing arrangements are sufficient to address the identified risks.

A proposed fence approximately one metre high does not, by itself, establish that all relevant safety risks have been adequately addressed. Similarly, the possibility of employing security staff if considered necessary does not provide the same assurance as a clear and enforceable management plan.

We therefore maintain our objection to the proposed external licensed area unless and until the Licensing Authority has properly assessed the evidence and the adequacy of the proposed arrangements.

4. Alcohol licensing, recorded music and public nuisance
Your letter states that Zebu Butchers does not intend to install live music outside and has no intention of increasing the volume of its existing background music.

However, our concerns are not limited to live music or an intention to increase the volume of a speaker.

The proposed external area may involve customers consuming alcohol, talking, gathering, playing recorded music and moving between the premises and the surrounding area. These activities may have implications for public nuisance and public safety depending on how, when and where they occur.

Under Section 4 of the Licensing Act 2003, the Licensing Authority must promote the prevention of public nuisance, alongside the other three licensing objectives.

The Environmental Protection Act 1990 also provides a framework for addressing noise that constitutes a statutory nuisance. The relevant assessment must take account of the circumstances and actual or potential effects of the noise concerned.

We therefore ask that the Council consider the proposed hours of use of the external area, the management of recorded music and other sound, customer behaviour, the potential for disturbance to neighbouring premises, and the measures available to prevent excessive noise.

We also request clarification of the precise licensable activities and hours sought under the variation, including the extent to which the application authorises alcohol consumption and regulated entertainment in the proposed external area.

The fact that live music is not proposed does not, by itself, answer these questions.

5. The four licensing objectives must be considered on their merits
Section 4 of the Licensing Act 2003 identifies four licensing objectives:

The prevention of crime and disorder.

Public safety.

The prevention of public nuisance.

The protection of children from harm.

Our representations must be assessed against these objectives and the evidence relevant to the proposed variation.

Your letter refers to material allegedly held by your client concerning our establishment. If you intend to submit such material to the Licensing Sub-Committee, it should be identified and assessed according to its relevance, reliability and evidential value.

However, historical allegations concerning our establishment do not automatically establish that our current representations are inaccurate, nor do they resolve the concerns raised by the proposed external drinking area.

Equally, we do not suggest that Zebu Butchers should be held responsible for unrelated conduct by our business or our customers. We expect the same approach to be applied consistently to both premises.

The proper course is to examine the proposed activities, the evidence, the likely effects and any conditions necessary to promote the licensing objectives.

6. The absence of objections from other businesses
Your letter refers to the fact that our establishment is, according to your client, the only business among more than 40 nearby businesses to have made representations.

We do not accept that the number of representations determines whether an individual representation is legitimate or deserves consideration.

The absence of objections from other businesses does not establish that the proposed variation presents no risks, nor does it negate the specific circumstances and concerns raised by a neighbouring premises.

The Licensing Authority must assess relevant representations on their individual merits and determine the application in accordance with the legislation, the applicable statutory guidance and the Council's licensing policy.

Our representations should therefore be considered on the basis of their content, relevance and supporting evidence, rather than the number of other businesses that have chosen to participate.

7. Fair and consistent treatment of any future incidents
We also wish to clarify an important concern regarding the assessment of any future incidents involving customers associated with either establishment.

For the avoidance of doubt, we are not suggesting that a particular incident has occurred where it has not. Our concern is prospective.

If an incident were to occur in the surrounding street involving customers associated with both premises, responsibility should be established through an objective assessment of the facts and the available evidence.

An incident should not automatically be attributed to one establishment merely because a person involved happens to be its customer. Where relevant, CCTV footage, witness statements, incident reports and police records should be considered.

We ask that any future incidents relied upon in connection with the licensing objectives be assessed fairly and consistently, without assumptions about which business is responsible.

This is relevant to our concerns about crime and disorder and public safety in the area surrounding the proposed external licensed space.

8. Our representations are not made in bad faith
We strongly reject the suggestion in your letter that our representations are made in bad faith or are intended to prevent or restrict Zebu Butchers' legitimate business growth.

We have exercised our right to make representations concerning a proposed licence variation that may affect our business and the surrounding environment.

Our concerns relate to the nature and extent of the proposed licensed activities, the external car park, the consumption of alcohol, noise, music, public safety and the potential impact on the licensing objectives.

The fact that our business may have its own commercial interests does not, by itself, demonstrate that our representations are made in bad faith. Nor does disagreement with our concerns establish that they are unfounded.

We expect our representations to be assessed objectively and on their merits, rather than characterised as an attempt to obstruct a competitor.

We remain prepared to substantiate our concerns through relevant evidence and to address any legitimate questions raised through the appropriate licensing procedure.

9. Our position and next steps
For the reasons set out above, we formally confirm that:

Bar Simprao Ltd, trading as Recanto Kings, will maintain all representations previously submitted against the proposed variation of Zebu Butchers Ltd's premises licence.

We will not withdraw any of our existing concerns.
We request that the proposed extension into the Unit 38 private car park be examined fully by the Licensing Sub-Committee, including the implications for alcohol consumption, noise, music, public safety and the protection of children.
We request that any evidence submitted concerning our establishment be identified and assessed fairly, with due regard to its relevance to the application.

We reserve the right to provide further relevant evidence and submissions in accordance with the Council's procedural requirements.
Please do not interpret our decision to maintain our representations as an unwillingness to engage constructively. We remain willing to participate in the process and to assist the Licensing Authority in determining the application fairly.

However, we do not consider that your letter has adequately addressed the substantive issues raised, and we see no proper basis for withdrawing our representations at this stage.

We therefore ask you to confirm that our representations will remain on the licensing file and that we will be notified of the Licensing Sub-Committee hearing date and any applicable deadlines for submitting further evidence.

Yours sincerely,

For and on behalf of Bar Simprao Ltd
Trading as Recanto Kings
Unit 25, Sapcote Trading Centre
London NW10 2DH

Re: Zebu Butchers Ltd – Application to Vary Premises Licence No. 31765
Premises: 38 Sapcote Trading Centre, High Road, London NW10 2DJ
Objector: Bar Simprao Ltd, trading as Recanto Kings

I write on behalf of Zebu Butchers Ltd ("my client" or "Zebu") in response to the further correspondence submitted by Bar Simprao Ltd, trading as Recanto Kings ("Bar Simprao"), confirming that it intends to maintain its representations against the variation of Zebu's premises licence.

This letter sets out my client's formal position following the withdrawal of the Metropolitan Police's representations and the confirmation that the Unit 38 private car park will not form part of the present variation application.

1. Legislative Framework and Scope of the Revised Application

The application was made pursuant to section 34 of the Licensing Act 2003. The determination of that application must be undertaken in accordance with the statutory framework, the applicable section 182 Guidance and Brent Council's Statement of Licensing Policy.

Pursuant to section 4 of the Licensing Act 2003, the Licensing Authority must exercise its functions with a view to promoting the four licensing objectives:

a) The prevention of crime and disorder;
b) Public safety;
c) The prevention of public nuisance; and
d) The protection of children from harm.

My client confirms that the Unit 38 private car park is no longer being pursued as part of this variation. Any future proposal to extend the licensed area into that car park will be addressed through a separate application, if pursued.

Accordingly, the present application must be determined by reference to the activities and hours remaining within its scope. Representations concerning the excluded car park, insofar as they have no material bearing on the remaining proposed activities, should not be treated as a basis for refusing the revised application.

The applicable statutory guidance requires representations to be relevant to the likely effect of the proposed variation on the licensing objectives. The question is therefore not whether Bar Simprao objects to my client's commercial development, but whether its remaining objections identify a properly evidenced risk to any of the statutory objectives arising from the activities now sought.

2. Withdrawal of the Metropolitan Police's Representations

My client notes that the Metropolitan Police has withdrawn its representations following confirmation that the proposed car park will be dealt with, if pursued, through a separate future application. Also, on previous letter, an explanation of each of the 4 points relevant to an application of this aspect were addressed.

My client welcomes this development and considers it important that the revised scope is accurately reflected in the Licensing Authority's records and the papers prepared for the hearing on the 21st October 2026.

For the avoidance of doubt, my client does not suggest that the withdrawal of the Police representations automatically determines the application in its favour or prevents other parties from maintaining relevant representations. However, the withdrawal is a material procedural development which should be reflected in the determination of the present application.

Bar Simprao's continued reliance on concerns relating specifically to the excluded car park must therefore be considered in that context. My client invites Bar Simprao to identify the precise grounds that remain relevant to the revised application and the evidence upon which it relies in support of each ground. According to their last representation as to how my client will handle each point, response is below, to be considered, as desired, on its own merits.

3. Prevention of Crime and Disorder

My client recognises the importance of the prevention of crime and disorder under section 4 of the Licensing Act 2003 and remains committed to operating its premises responsibly and in accordance with its licence conditions.

Zebu maintains appropriate management arrangements, including responsible alcohol-sales procedures, staff supervision, incident recording and cooperation with the Police. My client has also provided assistance to the Police in connection with incidents in the surrounding area. Rules are set by my client as how to deliver its business and protect from crime and disorder. Conversations about specific aspects as politics, religion and football will be restricted and monitor to its minimum to avoid possible conflicts. Bets gaming are forbidden if it becomes acknowledge of the staffs. Customer refusal to entry will be handled to the use of restrictive clothes that could arise any internal conflict. Loud voice and nuisance will be dealt with immediate expulsion from premises. Possession of arms is completely forbidden and will be treated as a serious offence that will be handled accordingly with the law. This measures are already in place and will continue on the same.

Any objection alleging that the revised variation is likely to increase crime or disorder should identify the factual basis of that alleged risk and explain its connection to Zebu's premises and the activities now proposed. My client is actually known by the Metropolitan Police as a business who has provided help on investigations that the Met Police needed. My client has never been involved on any incident concerning safety of the population or any business around. This should be treated as a proper evidence of how my client is handling the prevention of crime and disorder and any variation should not be a reason to speculate that possible crime or disorder might arise from the variation. 3 years of continued compliance with this first point of licencing should reflect the way that my client considers its seriousness.

Generalised references to incidents elsewhere within Sapcote Trading Centre cannot, without evidence establishing a relevant connection, be treated as proof that my client's proposed operation will undermine this licensing objective. As previously stated, previous incidents that occurred within the Sapcote Trading Centre, puts my client in a good position

as every time that the Police has sought help or access to CCTV, my client has provided everything needed.

My client invites the Licensing Sub-Committee to assess the application by reference to Zebu's own operating arrangements, relevant history and the evidence relating specifically to the premises, rather than assumptions arising from the conduct or management of independently operated neighbouring businesses.

Considering the history and the measures taken by my client's business during their business life, any representation concerning the prevention of crime and disorder should be carefully and objectively assessed against the available evidence before any allegation or implication of wrongdoing is made against my client.

4. Public Safety

The proposed extension into the Unit 38 private car park has been removed from the present application. Consequently, concerns relating exclusively to the proposed use of that area, including its fencing, vehicle movements and the positioning of customers within that area, should not determine the outcome of this variation.

The remaining application should be assessed against the actual premises layout, existing safety arrangements, emergency procedures, staff supervision and any additional proportionate conditions considered necessary to promote public safety.

My client remains willing to comply with reasonable, clear and enforceable conditions which are appropriate to the activities remaining within the application.

In the absence of evidence identifying a material public-safety risk arising from those remaining activities, my client submits that generalised concerns relating to the excluded car park should not be relied upon to justify refusal of the variation in its entirety.

Measures for Public Safety should not only be considered as to what could happened on the external area but also on how the business is run. As a Food business, is in the interest of the Public safety all measures in relation to food and drinks. My client is in possession of all accurate and up to date certificates for food handling. Allergenic information is displayed within the food area and staffs are properly trained to treat this issue as part of the safety measures of the business as a priority.

Any person who is seen as to be drunk will be refused from further alcohol drinking in the premises.

Installation of step-free access is been set for installation by the 1st of November 2026. Hazards inside the premises have been addressed and any risks of accidents have been taken into consideration for any appropriate work needed. BBQ and fire areas are set with the appropriate extinguisher for the "in case of" an accident occurs.

Again, on this matter, appropriate training has been done by all staff members.

Therefore, based on works carried out and training accordingly done, the Public Safety concern for the licence, should not be an objection on its own.

5. Prevention of Public Nuisance

My client recognises its responsibility to prevent unreasonable noise and disturbance associated with its licensed activities.

The application proposes live music indoors only, with outdoor recorded music ceasing by 22:00. My client is prepared to operate appropriate management controls concerning music volume, customer behaviour, complaint handling and orderly dispersal.

Any remaining representation concerning public nuisance should identify the particular activity said to create a risk, the likely effect of that activity and the evidence supporting the objection.

Speculative concerns, or objections dependent upon the use of the excluded car park, should not be treated as sufficient in themselves to justify refusal of the remaining application.

My client respectfully submits that any evidenced risks can be assessed against the proposed operating arrangements and, where necessary, addressed through appropriate and proportionate licence conditions.

As previously stated for both the Crime Prevention and Public Safety concerns, the history of the management of my client's business does not show any risk to further breach of the nuisance and therefore should be considered as that. Same treatment is to be made regardless of opening times.

In terms of customers risen voice, is a matter that in case this occurs, will be treated accordingly if happens. The premises are doubled glass, which already restricts the noise to be an issue in the area. My client is happy to be tested by an authorised equipment to check whether the outdoors music is above the limits of the law or not. It is not the intention of my client to modify any music systems in the outdoors.

Again, this matter of the licence should not be an objection.

6. Protection of Children from Harm

My client takes seriously its obligations concerning the protection of children from harm.

Zebu operates a Challenge 25 policy and maintains procedures concerning age verification, responsible alcohol sales and staff training. Its proposed operation should be assessed in the context of these arrangements and the actual activities remaining within the variation.

Any objection alleging that the revised application would undermine this licensing objective should be supported by evidence relevant to the premises and the activities now proposed.

My client submits that this objective should be assessed on its actual operating arrangements and the evidence available, rather than on hypothetical risks associated exclusively with an area no longer included in the application.

My client currently takes into serious account the safety not only the children but the anyone in the premises, controlling distancing from the BBQ to the public and controlling children playing in the premises and the outside. Nonetheless, the main responsibility for

children's behaviour lasts to their parents or responsible adult at the time. Notice displaying this request to adults are inside the premises.

7. Relevance and Evidential Weight of Bar Simprao's Representations

My client acknowledges that Bar Simprao is entitled to make representations under the Licensing Act 2003. However, the existence of that right does not mean that every allegation advanced must automatically be accepted or afforded substantial evidential weight.

The Licensing Authority must assess the relevance, factual basis and evidential support of the representations, having regard to the licensing objectives and the revised scope of the application.

My client is particularly concerned that Bar Simprao continues to maintain objections which substantially rely upon the proposed car park despite that area having been removed from the present variation. My client therefore requests that Bar Simprao identify the precise remaining issues it intends to pursue and explain how each relates to the likely effect of the revised application on a statutory licensing objective.

My client further submits that unsupported allegations, speculation and matters which are no longer relevant to the variation should not be permitted to obscure the actual issues requiring determination.

My client remains concerned that the allegations and representations made by Bar Simprao are unsubstantiated and should be scrutinised carefully in light of the available evidence concerning Bar Simprao's own compliance with applicable licensing requirements. Whilst my client accepts that Bar Simprao's representations must be considered independently and on their own merits, this should not preclude proper scrutiny of the factual basis, credibility and evidential weight of those representations.

Accordingly, my client reserves the right to invite the Licensing Authority and the Licensing Sub-Committee to consider what weight, if any, should reasonably be attached to representations made by Bar Simprao where there is credible evidence of any failure by that business to comply with its own licensing obligations. Any such assessment should, of course, be based on relevant and verifiable evidence and should be undertaken consistently with the statutory licensing objectives.

8. Concerns Regarding Potential Bad Faith and Commercial Motivation

My client maintains its concern that Bar Simprao's representations may be influenced, at least in part, by an improper commercial motive.

To my client's knowledge, Bar Simprao is the only neighbouring business to have submitted representations against this application, notwithstanding the number of other businesses operating within the surrounding trading centre. Bar Simprao also operates in the same general sector as my client and may therefore be regarded as a commercial competitor.

My client accepts that neither the fact that Bar Simprao is the sole objector nor the fact that it operates a competing business is, individually, sufficient to establish bad faith. Nevertheless, my client considers that these circumstances, when considered alongside the nature and breadth of the restrictions sought and the further evidence available, give rise to a legitimate concern that the representations may extend beyond the genuine

promotion of the licensing objectives and may have the effect of restricting my client's legitimate commercial development. It is seriously concerned the fact of lack of evidence from the objector on their representations. It is aware to the objector and all agencies as Metropolitan Police, Brent Council, Home Office and even HMRC, that the objector has failed to comply with all minimum and reasonable measures to avoid Crime, Disorder, Nuisance, Illegal workers, and Tax Evasion.

My client therefore maintains its position that the possibility of an improper commercial motive should be considered when assessing the factual basis and evidential weight of the representations. This is not an invitation to disregard Bar Simprao's representations merely because it is a competitor; it is an invitation to scrutinise them objectively and to distinguish genuine, evidenced licensing concerns from assertions which are speculative, irrelevant or unsupported.

My client respectfully asks the Licensing Sub-Committee to consider whether the restrictions sought by Bar Simprao are justified by evidence of a likely adverse effect on the licensing objectives, rather than by commercial opposition to the proposed development of a neighbouring business.

9. Evidence Concerning Bar Simprao's Own Management and Operation

My client holds documentary and photographic material concerning Bar Simprao's management and operation, including its external arrangements, the positioning of its CCTV cameras, and matters relating to incidents and regulatory concerns.

To the extent that this material is relevant and properly admissible, my client reserves the right to submit it in order to test the consistency, reliability and evidential weight of the allegations advanced against Zebu.

In particular, my client considers that evidence which materially contradicts assertions made by Bar Simprao concerning responsible management, public safety, nuisance or compliance may be relevant to the weight that should properly be attached to those assertions. My client does not contend that unrelated allegations automatically invalidate Bar Simprao's representations; rather, it asks that any demonstrated inconsistency be assessed objectively and in its proper context.

My client also holds material concerning its own assistance to the Police in relation to incidents in the surrounding area. Where relevant to an allegation advanced by Bar Simprao, this material may be submitted to demonstrate the steps taken by Zebu to cooperate with the authorities and to address concerns relating to the licensing objectives.

Any concerns regarding CCTV positioning, data protection, immigration or right-to-work compliance, or other regulatory matters will be presented only to the extent supported by reliable evidence. My client reserves the right to provide relevant information to the Police, the Home Office and the Council for consideration within their respective statutory functions.

No allegation is advanced as an established finding merely because a complaint has been made or an investigation may be ongoing. Equally, where reliable evidence is available and directly relevant to a factual assertion made in these proceedings, my client reserves the right to rely upon that evidence in accordance with the applicable procedure.

In these circumstances, my client respectfully invites the Licensing Sub-Committee to consider what evidential weight should properly be given to assertions made by Bar Simprao where the available evidence may demonstrate material inconsistencies between the standards it seeks to impose on Zebu and the conduct or management reflected in the evidence concerning its own premises.

10. Request for Withdrawal or Particularisation of the Remaining Representations

In light of the revised scope of the application, my client invites Bar Simprao, once again, to reconsider its position and withdraw any objections which are no longer relevant to the activities now being pursued.

Should Bar Simprao maintain its opposition, my client requests that it identify:

a. Each remaining ground of objection;
b. The licensing objective to which that ground relates;
c. The factual basis and supporting evidence relied upon; and
d. The specific adverse effect alleged to arise from the activities remaining within the variation.

This request is made to ensure that the issues before the Licensing Sub-Committee are properly defined and that the hearing is directed towards the matters which genuinely require determination. The request to the objector is not to write concerns and dispose the same, but to evidence by facts, each of their own concerns to support their representations on each point of the licencing objections.

My client further invites the Licensing Authority to give appropriate weight to the relevance, reliability and evidential support of each representation, rather than treating all allegations as equally substantiated.

My client reserves the right to submit, separately from the present licensing application, any relevant evidence in its possession concerning the premises at Unit 25, in support of any ongoing or future investigations that the Council, the Home Office, HMRC or the Police may consider necessary or appropriate.

Much of this information has already been brought to the attention of the relevant authorities. Given the potentially sensitive nature of the material and the need to protect the identity and security of those who have provided it, my client intends to tre at such information as confidential and will not disclose it as part of the present application. Any disclosure to the relevant authorities will be considered separately and handled through appropriate channels, subject to any applicable legal obligations.

11. Determination on the Merits and Proportionality of Conditions

My client respectfully submits that the application should be determined on its own merits, by reference to the actual activities sought, the evidence concerning Zebu's premises and the steps proposed to promote the licensing objectives.

Where a properly evidenced risk is identified, the Licensing Sub-Committee should consider whether it can be adequately addressed through clear, enforceable and proportionate conditions consistent with the statutory framework.

My client remains willing to engage constructively with the Licensing Authority and to accept reasonable conditions appropriate to the activities remaining within the application. It does not, however, accept that the entire variation should be refused on the basis of speculative concerns, objections relating exclusively to the excluded car park or unsupported allegations concerning its proposed operation.

My client accordingly invites the Licensing Sub-Committee to determine the application by reference to the evidence, the four licensing objectives and the applicable statutory framework, without allowing unsupported allegations or potentially competitive considerations to substitute for a proper assessment of the revised application.

Lastly, my client requests that any representations arise from trustful business or agencies and that the representations are properly funded and not speculated.

12. Formal Requests and Conclusion

For the reasons set out above, my client respectfully requests that the Licensing Authority:

a. Assess the relevance, reliability and evidential support of Bar Simprao's remaining representations;
b. Ensure that any evidence submitted by the parties is considered fairly and in accordance with the applicable procedural requirements; and
c. Determine the application on its own merits, considering whether any properly evidenced risks can be addressed by proportionate and enforceable conditions.
d. Request Unit 25 to provide with the right ICO fee to be recording my client's premises instead of public area.

My client remains willing to cooperate with Brent Council and the relevant authorities to ensure that the premises are operated responsibly and consistently with the licensing objectives.

Zebu Butchers reserves all its rights, including the right to submit further relevant evidence and written representations in accordance with the Council's procedural timetable.

I look forward for confirmation of the revised scope of the application and the applicable timetable for the submission of further evidence.

Patricia de Farias Jimeno
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Zebu Butcher's Ltd
Unit 38
Sapcote Trading Centre
High Road
NW10 2DJ

23 September 2026

Our Ref: 39346

Dear Zebu Butcher's Ltd,

Licensing Representation to the Variation Application for the Premises Licence at Zebu Butchers, Unit 38, Sapcote Trading Centre, High Road, NW10 2DJ.

I certify that I have considered the application shown above and I wish to make a representation that the likely effect of the grant of the application is detrimental to the Licensing Objectives for the reasons indicated below.

This representation is made by an officer of the Licensing Authority, in whose area the premises are situated and authroised to exercise its statutory function as a 'Responsible Authority' under the Licensing Act 2003.

The application has been made to vary the premises licence under section 34 of the Act.

The Licensing Authority representations are primarily concerned with the four licensing objectives;

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

Overview

The full variation application, submitted by the licence holder on 27 August 2026, seeks the following changes to the premises licence:

- **To extend the licensed area to include the private car park serving Unit 38, for customer seating/standing and the consumption of food and alcohol.**
- **To extend the sale of alcohol to 10:00–00:00, Monday to Sunday.**
- **To extend the opening hours of the premises to 09:00–00:30, Monday to Sunday.**
- **To add live music, amplified and unamplified from 12:00–00:00, Monday to Sunday (indoors only)**
- **To add recorded background music from 10:00–00:00, Monday to Sunday, with outdoor recorded music permitted until 22:00.**

Licensing Authority's Position

There is no objection to the proposed extension of alcohol sales hours, opening hours, or the addition of live and recorded music.

However, the Licensing Authority does not support the proposed extension of the licensed area to include the private car park.

Having considered the additional information submitted, the Licensing Authority remains concerned that incorporating the private car park into the licensed area would create an additional external space that has the potential to increase noise disturbances, as well as give rise to public safety concerns. Additionally, this could have an adverse impact on the licensing objectives, particularly the prevention of public nuisance and public safety.

Should the licence holder be willing to accept the above, the Licensing Authority also proposes that the following conditions supersede the existing conditions:

1. The premises shall operate and maintain a digital colour CCTV system. The CCTV system shall continually record whilst the premises are open for licensable activities, and all recordings shall be kept for 31 days.

2. The CCTV system shall 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 frontage of the premises.

3. A member of staff trained in the use of the CCTV system shall be available at the premise at all times that the premises are open to the public. This member of staff shall be able to view, download and make copies of any CCTV requests made by the police or authorised officer(s).

4. CCTV footage shall be provided within 24 hours upon request by 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.

5. The CCTV system shall display the correct date and time on any footage.

6. Signage stating that CCTV is in operation shall be clearly and prominently displayed at the premises.

7. A "Challenge 25" policy shall be adopted and adhered to. Acceptable proof of age shall include identification bearing the customer's photograph, date of birth and integral holographic mark or security measure. Suitable means of identification would include PASS approved proof of age card, photo-card driving licence and passport.

8. A refusal book detailing date and time of the refused sale, the name of the person refusing the sale and a description of the person attempting to purchase alcohol, shall be kept and maintained and made available for inspection at the premises.

   Any entries into the log shall be made within 24 hours of any incident and shall contain the time/date of the incident, the nature of the incident, a description of the people involved, the action taken and details of the person responsible for the management of the premises at the time of the incident.

9. An incident log shall be kept at the premises, and made available for inspection on request to an authorised officer of Brent Council or the Police, which will record the following:

    a) all crimes reported to the venue
    b) all ejections of patrons
    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 24 hours of any incident and shall contain the time/date of the incident, the nature of the incident, a description of the people involved, the action taken and details of the person responsible for the management of the premises at the time of the incident.

10. Any staff directly involved in selling alcohol for retail to consumers, staff who provide training and all managers will undergo regular training (every 12 months) of Licensing Act 2003 legislation. This will be documented and signed for by the DPS and the member of staff receiving the training.

    The training records shall detail:-

    a) Staff member's name
    b) Staff member's signature
    c) Name of person providing the training
    d) Date of training
    e) Training on the licensing objectives
    f) Training on use of the incident log
    g) Training on refusal of sale
    h) Training on challenge 25 policy

    This training shall be kept at the premises and made available immediately upon request to the police or authorised officers from Brent Council.

11. The premises licence holder or the DPS shall ensure that an "authorisation to sell alcohol" document is kept and maintained at the premises. Each employee involved in the supply of alcohol at the premises must be named on this document with it being signed off by the DPS.

12. A notice stating "No proof of age – No sale" shall be displayed at the point of sale.

13. A notice asking customers to leave quietly from the premises shall be displayed by the exit/entrance.

14. There shall be no self-service of spirits on the premises with all spirits being located behind counter.

15. No more than twenty percent (20%) of the sales area shall be used at any one time for the sale, exposure for sale, or display of alcohol.

16. No high strength beers, lagers, and ciders above 6.0% ABV shall be stocked or sold.

17. All deliveries (to the premises) shall take place during the normal working day (i.e. 09:00 to 18:00 daily).

External Area:

18. Customers shall not be permitted to take open drink containers outside the premises as defined on the plan submitted to and approved by the Licensing Authority.

19. The front external seating area shall be closed to customers after 23:00 each day. After this time, all tables and chairs shall be removed or securely stacked.

Online/Takeaway Orders:

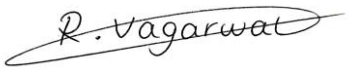
20. Drivers shall not deliver to any person anywhere other than that at the residential / business address given when the order was placed. There shall be NO deliveries made to any open/public spaces.

21. The Premises Licence Holder so far as reasonably practicable will request no idling of delivery vehicles.

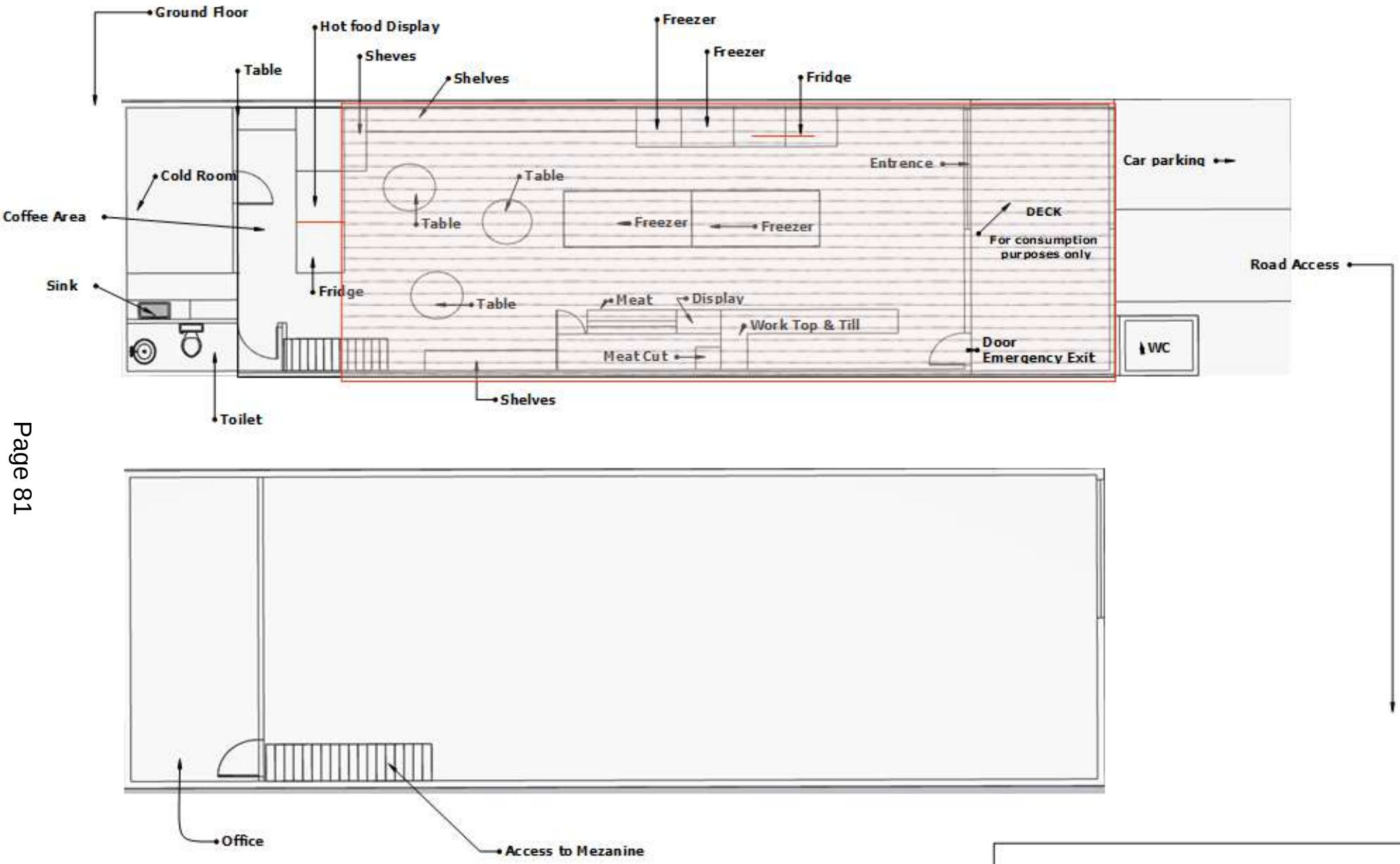
22. Delivery drivers should be asked to keep noise to a minimum when collecting takeaways and must not be permitted to loiter unnecessarily.

It will be necessary for you to confirm in writing that you accept the above in order for the Licensing Authority to withdraw this representation.

Yours Sincerely,



Rhea Vagarwal
Licensing Enforcement Officer
Regulatory Services



ZEBU Butcher's Ltd

Unit 38, Sapcote Trading Centre - London - NW10 2DJ

Company Reg. No. 15277861

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From: Vagarwal, Rhea
Sent: 28 September 2026 11:56
To: Jefferson Zebu
Cc: Esther, Chan; Legister, Linda; Business Licence
Subject: RE: CONSULT: Variation - Zebu Butchers, Unit 38 Sapcote Trading Centre, High Road, NW10 2DJ - 39346

Dear Jefferson Kauffman,

Thank you for confirming that you agree to the conditions set out in my representation dated 23 September 2026. Please note the conditions will supersede the existing conditions attached to the licence.

I also note your confirmation that the proposed changes to which the Licensing Authority objected to have been withdraw.

For the avoidance of doubt, the attached premises plan is the current approved plan and will remain to form part of the premises licence.

I now wish to withdraw the Licensing Authority's representation.

Should you have any questions, please do not hesitate to contact me.

Kind regards

Rhea Vagarwal
Licensing Enforcement Officer
Regulatory Services

From: Jefferson Zebu
Sent: 26 September 2026 13:18
To: Vagarwal, Rhea
Cc: Esther, Chan; Legister, Linda; Business Licence
Subject: Re: CONSULT: Variation - Zebu Butchers, Unit 38 Sapcote Trading Centre, High Road, NW10 2DJ - 39346

Dear Rhea,

Further to our correspondence below, and following our confirmation of agreement to the proposed conditions, we have reviewed the remaining scope of the Full Variation Application for Zebu Butcher's Ltd, Application Ref. 39346, and wish to formally confirm one further reduction.

As previously confirmed, we have withdrawn the proposed extension of the licensed premises into the private car park.

Following the withdrawal of that proposed external extension, we have reviewed the remaining external element of the application and have decided that we also no longer wish to pursue the specific request for recorded music outdoors between 10:00 and 22:00.

We therefore formally withdraw that element from Application Ref. 39346.

For the avoidance of doubt, the following elements are no longer being sought under this Full Variation Application:

1. the proposed extension of the licensed premises into the private car park; and
2. the proposed additional authorisation for recorded music outdoors between 10:00 and 22:00.

These withdrawals relate solely to the additional permissions sought under the present Full Variation Application.

Nothing in these withdrawals is intended to surrender, reduce or otherwise vary the existing licensed premises, the existing approved licensed area, or the existing legal position applicable to the premises under Premises Licence No. 31765 and applicable legislation.

In particular, the existing deck remains part of the existing licensed premises. We are not proposing any reduction or surrender of that existing licensed area.

For the avoidance of any misunderstanding, by withdrawing the request for additional recorded music outdoors from this variation, we are not offering, agreeing to or volunteering any new condition, restriction or prohibition in respect of music on the existing licensed deck.

The existing premises, including the existing licensed deck area, will continue to be operated in accordance with Premises Licence No. 31765, applicable legislation and any conditions lawfully applicable to the premises.

We respectfully request that Application Ref. 39346 proceeds on this revised and reduced basis.

For clarity and for our records, we would be grateful if the Licensing Authority could please confirm in writing that:

- the proposed extension into the private car park has been withdrawn from Application Ref. 39346;
- the request for recorded music outdoors between 10:00 and 22:00 has been withdrawn from Application Ref. 39346;
- the existing licensed area under Premises Licence No. 31765, including the existing deck, is not being reduced, surrendered or otherwise altered as a consequence of those withdrawals; and

- Application Ref. 39346 will proceed on the basis of the remaining elements of the variation as amended.

All other remaining elements of the Full Variation Application continue as amended, together with the conditions already agreed with the Licensing Authority.

We would be grateful for written confirmation that the application record has been updated accordingly.

Kind regards,

Jefferson Kauffmam
Director
Zebu Butcher's Ltd

On Fri, 25 Sep 2026 at 23:17, Jefferson Zebu wrote:

Dear Rhea,

Thank you very much for your clarification.

We understand and are content with the clarification provided regarding Conditions 18 and 19.

We confirm in writing that we agree to the Licensing Authority's proposed conditions and also accept the Licensing Authority's position that the private car park will not be included within the licensed area as part of our current variation application.

Thank you for your assistance and guidance throughout this process.

Kind regards,

Jefferson Kauffmam
Director
Zebu Butcher's Ltd

On Fri, 25 Sep 2026 at 12:50, Vagarwal, Rhea <Rhea.Vagarwal@brent.gov.uk> wrote:

Dear Jefferson,

Thank you for your response.

Please note that Condition 18 applies to all beverages, alcoholic and non-alcoholic.

I can also confirm that after 23:00hrs, customers who remain inside the premises may temporarily leave to smoke however, no open containers of any beverage shall be taken outside the premises.

If you are content with the above, please confirm your agreement in writing so that the Licensing Authority can withdraw its representation.

Kind regards

Rhea Vagarwal
Licensing Enforcement Officer
Regulatory Services
Brent Council

From: Jefferson Zebu
Sent: 24 September 2026 18:00
To: Vagarwal, Rhea
Cc: Esther, Chan; Legister, Linda Business Licence <business.licence@brent.gov.uk>
Subject: Re: CONSULT: Variation - Zebu Butchers, Unit 38 Sapcote Trading Centre, High Road, NW10 2DJ - 39346

Hi Rhea,

Further to your representation regarding our Full Variation Application Ref. 39346, I would like to confirm in writing that we accept the Licensing Authority's proposed conditions.

We also accept the Licensing Authority's position regarding the private car park and confirm that we are happy for the proposed extension of the licensed area to include the private car park to be removed from our current variation application.

I have sent a couple of emails seeking clarification on Conditions 18 and 19. These questions are simply to ensure that we fully understand how the conditions should operate in practice, so that we can implement them correctly and make the requirements clear to our staff and customers. They do not affect our acceptance of the proposed conditions.

We would be grateful if you could respond to those clarification points when convenient.

Thank you very much for your assistance.

Kind regards,

Jefferson Kauffmam
Zebu Butcher's Ltd

From: Jefferson Zebu
Sent: 24 September 2026 13:11
To: Vagarwal, Rhea
Cc: Esther, Chan; Legister, Linda; Business Licence
Subject: Re: CONSULT: Variation - Zebu Butchers, Unit 38 Sapcote Trading Centre, High Road, NW10 2DJ - 39346

Hi Rhea,

Sorry, I realised after my previous email that I had forgotten to ask one further question regarding Condition 19.

We understand that the front external seating area must close to customers after 23:00 and that, after this time, the tables and chairs must be removed or securely stacked.

Could you please clarify whether, after 23:00, customers who are still inside the premises would be permitted to briefly step outside for smoking only, without taking any drinks outside with them?

Apologies for the additional question. We just want to make sure that we fully understand the conditions so that we can implement them correctly from the outset, make the rules clear to our staff and customers, and ensure that they are followed at all times.

Thank you very much for your guidance.

Kind regards,

Jefferson Kauffmam
Zebu Butcher's Ltd
Premises Licence No. 31765
Full Variation Application Ref. 39346

On Thu, 24 Sep 2026 at 10:23, Jefferson Zebu wrote:

Hi Rhea,

Thank you for your email and for sending the Licensing Authority's representation.

We have reviewed the proposed conditions and just wanted to clarify one point before providing our written confirmation.

Regarding Condition 18, which states:

"Customers shall not be permitted to take open drink containers outside the premises as defined on the plan submitted to and approved by the Licensing Authority." Could you please confirm whether "open drink containers" in this condition is intended to refer specifically to

alcoholic drinks, or whether it also includes non-alcoholic drinks such as soft drinks and water?

Thank you for your clarification.

Kind regards,

Jefferson Kauffmam
Zebu Butcher's Ltd
Premises Licence No. 31765
Full Variation Application Ref. 39346

On Wed, 23 Sep 2026 at 11:29, Vagarwal, Rhea wrote:

Dear Jefferson,

Thank you for providing the additional information.

Please find attached representation from the Licensing Authority.

In order for the Licensing Authority to withdraw this representation, it will be necessary for you to confirm in writing that you accept the attached.

Kind regards

Rhea Vagarwal
Licensing Enforcement Officer
Regulatory Services

From: Jefferson Zebu
Sent: 22 September 2026 14:12
To: Vagarwal, Rhea
Cc: Esther, Chan; Legister, Linda; Business Licence
Subject: Re: CONSULT: Variation - Zebu Butchers, Unit 38 Sapcote Trading Centre, High Road, NW10 2DJ - 39346

Dear Rhea Vagarwal,

Thank you for your email.

Please find attached the signed written confirmation from our landlord, confirming his permission for Zebu Butcher's Ltd to use the private car park at Unit 38 as an outdoor customer seating area.

Regarding your question as to whether the proposed car park area will be fenced off, yes. Whenever the private car park is being used as an outdoor customer area, it will be clearly defined and separated from vehicle movements by a suitable removable barrier system.

The barriers will be put in place while the area is being used by customers and removed and stored when it is not in use. The area will also be supervised by staff. We would be very happy to follow any recommendations from Brent Council regarding the most appropriate type of barrier or any additional reasonable safety measures for the car park.

In addition, we are voluntarily attaching a separate PDF which we have prepared specifically for Brent Council's Licensing Authority in connection with our Full Variation application.

The document provides further information about how we intend to operate the premises and the private car park, together with our existing management controls and the additional safeguards we propose. This includes measures relating to the prevention of crime and disorder, CCTV, management and supervision of the external area, public safety, responsible alcohol sales, staff training, Challenge 25, incident and refusals recording, noise management, customer dispersal and the protection of children.

It also sets out our commitment to continuing to cooperate and work constructively with Brent Council, the Metropolitan Police and neighbouring businesses in promoting the licensing objectives and, where reasonably possible, helping to prevent crime, disorder and anti-social behaviour in the surrounding area.

We wanted to provide this information voluntarily so that the Licensing Authority has a clear and comprehensive understanding of our proposed operation and the measures we intend to have in place.

Please let us know if you require any further information or if Brent Council has any recommendations regarding the proposed arrangements.

Kind regards,

Jefferson Kauffmam
Director
Zebu Butcher's Ltd
Premises Licence No. 31765
Full Variation Application Ref. 39346

On Mon, 21 Sep 2026 at 12:55, Vagarwal, Rhea wrote:

Dear Jefferson,

Thank you for your response.

For our records, please provide written confirmation from the landlord permitting the use of the private car park.

I would also be grateful if you could confirm whether the proposed external area would be fenced off.

Kind regards

Rhea Vagarwal
Licensing Enforcement Officer
Regulatory Services

From: Jefferson Zebu
Sent: 18 September 2026 17:44
To: Vagarwal, Rhea
Cc: Esther, Chan; Legister, Linda; Business Licence
Subject: Re: CONSULT: Variation - Zebu Butchers, Unit 38 Sapcote Trading Centre, High Road, NW10 2DJ - 39346

Dear Rhea,

Thank you for your email.

Please see below our responses regarding the outdoor area:

1. **What will be the capacity of the outdoor area?**
   The maximum capacity of the outdoor area will be 25 people.
2. **Will the outdoor area feature seating, standing room, or both?**
   Both: seating and standing room.
3. **Will there be fixed outdoor speakers?**
   No. There will be no fixed outdoor speakers. We will use a small portable speaker for recorded background music in the outdoor area. It will be kept at a low volume so as not to disturb neighboring establishments. The small unit will be placed in the outdoor area when we open at 10:00 AM and removed by 10:00 PM.
4. **Will there be bands, DJs, or amplified live entertainment in the outdoor area?**
   No. There will be no bands, DJs, or amplified live entertainment in the outdoor area. The small portable speaker mentioned earlier will be used solely for recorded background music—as stated in our application—between 10:00 AM and 10:00 PM.
5. **Is the parking area private?**
   Yes. The parking area for Unit 38 is private.
6. **Do you have the landlord's permission to use the parking area in this way?**
   Yes. We have the landlord's permission to use the parking area in this way. If necessary, we can also provide written confirmation from the landlord.

I hope the above provides all the information you require. Please let me know if you need anything further.

Kind regards,

Jefferson Kauffmam
Zebu Butcher's Ltd

On Thu, 17 Sep 2026 at 12:23, Vagarwal, Rhea wrote:

Dear Zebu Butchers Ltd,

On the behalf of the Licensing Authority, I am currently in the process of assessing the above application.

The Licensing Authority considers that additional information is required regarding the proposed operational model.

I therefore request for the following information to be provided:

1. **What is the proposed capacity of the external area?**
2. **Will the external area be seated, standing or a combination of both?**
3. **Will speakers be fixed externally on the premises?**
4. **Will live bands, DJs or other amplified entertainment take place in the external area?**
5. **Is the car park privately owned? If yes, do you have permission to use the land for the proposed activities?**

Until a response to the above has been received, I am unable to determine whether the application can be granted.

The Licensing Authority therefore submits a holding representation seeking **refusal** of the application at this stage, pending receipt of further information. This representation is submitted without prejudice and is intended to preserve the Authority's position until sufficient details have been provided to allow a proper assessment of the proposal.

Once the requested information has been received and discussed, the Licensing Authority will review its position.

Should you have any questions, please do not hesitate to contact me.
Kind regards
Rhea Vagarwal
Licensing Enforcement Officer

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To: **Brent Council - Licensing Authority**

Re: Zebu Butcher's Ltd - Unit 38, Sapcote Trading Centre, High Road, London, NW10 2DJ

Premises Licence No.: 31765

Full Variation Application Ref.: 39346

To whom it may concern,

I confirm that the private car park area adjacent to Unit 38, Sapcote Trading Centre, forms part of the area occupied by Zebu Butcher's Ltd under its tenancy.

I also confirm that, as the landlord, I have no objection to and give my permission for Zebu Butcher's Ltd to use this private area as an outdoor customer seating area, including for customers to sit, eat and drink.

Kind regards,

[redacted]

Landlord

On behalf of Kara Realty Trading Ltd

Signature: [redacted]

Date: 18 September 2026

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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: 17465
Application No: 33686
Date: 10 January 2025

London Borough of Brent

Premises Licence

Part A

This Premises Licence was granted by Brent Council, Licensing Authority for the area of the Borough of Brent under the ***Licensing Act 2003***

Original grant date: 15 June 2024
Current issue date: 03 January 2025

Authorised signatory

Premises licence number: 31765

Part 1 – Premises Details

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

Zebu Butchers
38, Sapcote Trading Centre, High Road, London, Brent, NW10 2DJ

Where the licence is time limited the dates

Licensable activities authorised by the licence

Section J: Sale of alcohol: Both

The times the licence authorises the carrying out of licensable activities

Section J: Sale or Supply of Alcohol: Both		
Day	**Start Time**	**End Time**
Monday	10:00	21:00
Tuesday	10:00	21:00
Wednesday	10:00	21:00
Thursday	10:00	21:00
Friday	10:00	21:00
Saturday	10:00	21:00
Sunday	10:00	21:00

N/A

N/A

The opening hours of the premises

Day	Start Time	End Time
Monday	09:00	21:00
Tuesday	09:00	21:00
Wednesday	09:00	21:00
Thursday	09:00	21:00
Friday	09:00	21:00
Saturday	09:00	21:00
Sunday	09:00	21:00

N/A

N/A

Where the licence authorises supplies of alcohol whether these are on and/or off supplies

Both

Part 2

Name, (registered) address, telephone number and email (where relevant) of holder of the premises licence

Zebu Butchers Ltd

[redacted]

Registered number of holder, for example company number, charity number (where applicable)

Name, address and telephone number of designated premises supervisor where the premises licence authorises the supply of alcohol

Andreia Batista De Vasconcelos

[redacted]

Personal licence number and issuing authority of personal licence held by designated premises supervisor where the premises licence authorises the supply of alcohol

[redacted]

Annex 1 – Mandatory conditions

No Irresponsible Drinks Promotions

(1) The responsible person must ensure that staff on relevant premises do not carry out, arrange or participate in any irresponsible promotions in relation to the premises.

(2) In this paragraph, an irresponsible promotion means any one or more of the following activities, or substantially similar activities, carried on for the purpose of encouraging the sale or supply of alcohol for consumption on the premises--

(a)games or other activities which require or encourage,

or are designed to require or encourage, individuals to-- (i) drink a quantity of alcohol within a time limit (other than to drink alcohol sold or supplied on the premises before the cessation of the period in which the responsible person is authorised to sell or supply alcohol), or (ii) drink as much alcohol as possible (whether within a time limit or otherwise);

(b) provision of unlimited or unspecified quantities of alcohol free or for a fixed or discounted fee to the public or to a group defined by a particular characteristic in a manner which carries a significant risk of undermining a licensing objective;

(c) provision of free or discounted alcohol or any other thing as a prize to encourage or reward the purchase and consumption of alcohol over a period of 24 hours or less in a manner which carries a significant risk of undermining a licensing objective;

(d) selling or supplying alcohol in association with promotional posters or flyers on, or in the vicinity of, the premises which can reasonably be considered to condone, encourage or glamorise anti-social behaviour or to refer to the effects of drunkenness in any favourable manner;

(e) dispensing alcohol directly by one person into the mouth of another (other than where that other person is unable to drink without assistance by reason of disability).

Free Water

The responsible person must ensure that free potable water is provided on request to customers where it is reasonably available.

Age Verification Policy

(1) The premises licence holder or club premises certificate holder must ensure that an age verification policy is adopted in respect of the premises in relation to the sale or supply of alcohol.

(2) The designated premises supervisor in relation to the premises licence must ensure that the supply of alcohol at the premises is carried on in accordance with the age verification policy.

(3) The policy must require individuals who appear to the responsible person to be under 18 years of age (or such older age as may be specified in the policy) to produce on request, before being served alcohol, identification bearing their photograph, date of birth and either--

(a) a holographic mark, or

(b) an ultraviolet feature.

Small Measures to be Available

The responsible person must ensure that--

(a) where any of the following alcoholic drinks is sold or supplied for consumption on the premises (other than alcoholic drinks sold or supplied having been made up in advance ready for sale or supply in a securely closed container) it is available to customers in the following measures--

(i) beer or cider: ½ pint;

(ii) gin, rum, vodka or whisky: 25 ml or 35 ml; and

(iii) still wine in a glass: 125 ml;

(b) these measures are displayed in a menu, price list or other printed material which is available to customers on the premises; and

(c) where a customer does not in relation to a sale of alcohol specify the quantity of alcohol to be sold, the customer is made aware that these measures are available

Minimum Price of Alcohol

1.A relevant person shall ensure that no alcohol is sold or supplied for consumption on or off the premises for a price which is less than the permitted price.

2.For the purposes of the condition set out in paragraph 1--

(a)—duty‖ is to be construed in accordance with the Alcoholic Liquor Duties Act 1979;

(b)—permitted price‖ is the price found by applying the formula--

P = D + (D x V)

where--

(i)P is the permitted price,

(ii)D is the amount of duty chargeable in relation to the alcohol as if the duty were charged on the date of the sale or supply of the alcohol, and

(iii)V is the rate of value added tax chargeable in relation to the alcohol as if the value added tax were charged on the date of the sale or supply of the alcohol;

(c)—relevant person‖ means, in relation to premises in respect of which there is in force a premises licence--

(i)the holder of the premises licence,

(ii)the designated premises supervisor (if any) in respect of such a licence, or

(iii)the personal licence holder who makes or authorises a supply of alcohol under such a licence;

(d) —relevant person‖ means, in relation to premises in respect of which there is in force a club premises certificate, any member or officer of the club present on the premises in a capacity which enables the member or officer to prevent the supply in question; and

(e)—valued added tax‖ means value added tax charged in accordance with the Value Added Tax Act 1994.

3.Where the permitted price given by Paragraph (b) of paragraph 2 would (apart from this paragraph) not be a whole number of pennies, the price given by that sub-paragraph shall be taken to be the price actually given by that sub-paragraph rounded up to the nearest penny.

4.(1) Sub-paragraph (2) applies where the permitted price given by Paragraph (b) of paragraph 2 on a day (—the first day‖) would be different from the permitted price on the next day (—the second day‖) as a result of a change to the rat e of duty or value added tax.

(2)The permitted price which would apply on the first day applies to sales or supplies of alcohol which take place before the

expiry of the period of 14 days beginning on the second day.

Requirement for a DPS

(1) No supply of alcohol may be made under the premises licence-

(a)at a time when there is no designated premises supervisor in respect of the premises licence, or

(b)at a time when the designated premises supervisor does not hold a personal licence or their personal licence is suspended.

(2) Every supply of alcohol under the premises licence must be made or authorised by a person who holds a personal licence.

Door Supervisors and Security Staff to be Licensed by the SIA (when required)

Where the licence includes a condition that at specified times one or more individuals must be at the premises to carry out a security activity, each individual must be licensed by the Security Industry Authority, with the following exceptions:

a) premises where the premises licence authorises plays or films

b) any occasion mentioned in paragraph 8(3)(b) or (c) of Schedule 2 to the Private Security Industry Act 2001 (premises being used exclusively by a club with a club premises certificate, under a temporary event notice authorising plays or films or under a gaming licence), or

c) any occasion within paragraph 8(3)(d) of Schedule 2 to the Private Security Industry Act 2001

Film Classification When required

(i) The admission of children to the exhibition of any film must be restricted in accordance with the recommendation of the designated film classification body unless section (ii) applies.

(ii) Where the licensing authority notifies the holder of the licence that this subsection applies the admission of children must be restricted in accordance with any recommendation made by the licensing authority.

In this section-

"children" means persons aged under 18; and

"film classification body" means the person or persons designated as the authority

under section 4 of the Video Recordings Act 1984 (c. 39) (authority to determine suitability of video works for classification).

Annex 2 – Conditions consistent with the operating schedule

1. CCTV shall be installed to Home Office Guidance standards and maintained in a good working condition and recordings shall be kept for 31 days and shall be made available to police and authorised Officers from Brent Council upon request.

2. CCTV camera shall be installed to cover all the entrances and exits of the premises.

3. A member of staff trained in the use of the CCTV system shall be available at the premise at all times that the premises are open for trading. This staff member must be able to view and download any footage requested by the police or authorised Brent Council official.

4. The CCTV system shall display on any recordings the correct date and time of the recording.

5. The CCTV system shall be capable of obtaining clear facial recognition images and a clear head and shoulder image of every person entering or leaving the premises.

6.The CCTV system shall display on any recordings, the correct date and time of the recording.

7.Signage stating that CCTV is in operation shall be clearly and prominently displayed at the premises.

8. A suitable intruder alarm complete with panic button shall be fitted and maintained.

9. A "Challenge 25" policy shall be adopted and adhered to at all times.

10. A sign stating "No proof of age -- No sale" shall be displayed at the point of sale.

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

12. An incident log shall be kept at the premises and made available for inspection on request to an authorised officer of Brent Council or the police, which will record the following:

a) Any complaints received.

b) Any incidents of crime & disorder.

c) Any faults in the CCTV system.

d) any customers banned from the premises

e) Any visit by a relevant authority or emergency service.

13. 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.

14. A copy of the premises licence summary including the hours which licensable activities are permitted shall be visible from outside of each entrance to the premises.

15. All Staff shall be trained (and shall undergo refresher training every 12 months) in respect of the CCTV operation, maintaining the incident log, the challenge 25 policy, prevention of proxy sales, signs of intoxication, dealing with refusal of sales and any subsequent confrontational behaviour from customers, all training records shall be made available for inspection by authorised officers of Brent Council and the Police.

16.The premises licence holder or the DPS shall ensure that an "authorisation to sell alcohol" document is kept and maintained at the premises. Each employee involved in the supply of alcohol at the premises must be named on this document with it being signed off by the DPS.

17. No more than Twenty percent (20%) of the sales area shall be used at any one time for the sale, exposure for sale, or display of alcohol.

18. No high strength beers, lagers, and ciders above 6.0% ABV shall be stocked or sold.

19.There shall be no self-service of spirits on the premises with all spirits being located behind counter.

20. The sale of alcohol shall be from 10.00 hours until 21.00 hours, seven days a week Monday through until Sunday.

21.All deliveries shall take place during the normal working day (i.e. 09:00 to 18:00 daily).

Condition included at Minor Variation 2024

22.Customers shall not be permitted to take open drink containers outside the premises as defined on the plan submitted to and approved by the Licensing Authority.

On Line / Take away Orders

23. Full name and address details, including postcode, must be given when placing an order.

24. Acceptable proof of age shall include identification bearing the customer"s photograph, date of birth and integral holographic mark or security measure. Suitable means of identification would include PASS approved proof of age card, photo-card driving licence and passport. No ID no delivery.

25. Drivers shall not deliver to any person anywhere other than that at the residential / business address given when the order was placed. There shall be **NO** deliveries made to any open/public spaces.

26. Delivery drivers should be asked to keep noise to a minimum when collecting takeaways and must not be permitted to loiter unnecessarily.

27. No idling of delivery vehicles.

Annex 3 – Conditions attached after a hearing by the licensing authority

Annex 4 – Plans

See attached

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From: Brendon.McInness@met.police.uk
Sent: 13 October 2026 12:21
To: jeffersonzebutchers
Cc: Business Licence; Legister, Linda
Subject: CONSULT: Variation - Zebu Butchers, Unit 38 Sapcote Trading Centre, High Road, NW10 2DJ - 39346

Good afternoon.

Having a look at the conditions that the applicant and Rhea have agreed. Police are happy with what is proposed.

Police have now withdrawn representations. To the above application.

Kind regards

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38 Sapcote Trading Centre, High Road, London NW10 2DJ
Application to vary premises licence – Licensing Act 2003
To the involved parties: Brent Council, Metropolitan Police and Unit 25 Sapcote Trading Centre, NW10 2DH

I write on behalf of Zebu Butchers Ltd in relation to the above application.

I should first clarify that I was not involved in the previous correspondence or representations submitted on behalf of Zebu Butchers. I have now been instructed to take conduct of this matter and will be dealing with the application and all related correspondence going forward.

Accordingly, please direct all future correspondence concerning this application to me.

I have now reviewed the application, the representations received, the correspondence to date and the material presently available to my client. Having done so, I wish to clarify Zebu Butchers' position at the outset.

1. **The application remains pursued in full, including the proposed external/car-park area.**

For the avoidance of doubt, Zebu Butchers does not intend to withdraw or remove the proposed extension of the licensed area to include the private car park serving Unit 38.

That element remains part of the application that Zebu Butchers wishes the Licensing Authority to determine. I respectfully ask the Licensing Authority to accept the amend and accept that the Carpark will be another matter to be discussed.

The application expressly seeks to extend the licensed area to include the private car parking area belonging to Unit 38 for customer seating and the consumption of food and alcohol. The external (Car Park) area will not be used during all times of opening hours. This area will remain as a car park for not busy times and most probably during morning times. The area has been planned to be installed with protective measures as closed wood fence of 1m height to avoid people either going out or in very quickly. This measure has been set to provide:

- Protection for children whenever they are on the area to avoid getting into the public road of the trading centre.
- Proper control of business as to whether customers leave the premises with alcohol or glass bottles.
- Protection to our customers in case of any undesired criminality occurs in the area unconnected to Zebu Butcher’s business.

The management of the external area will be run by the Business having trained staff controlling the entry/exit and if necessary, security staff will be added.

I note that the Licensing Authority has expressed concerns regarding the proposed external area, particularly in relation to public safety and public nuisance. Those concerns are understood and will be addressed substantively at the appropriate stage. In terms of nuisance, my client does not intend to install or to put live music outside. The current situation is that my client has a small speaker that is put outside to have some background music. The extension of the car park has no intention to increase the volume that is still ongoing on the “deck” area.

However, Zebu Butchers does not accept that the proposed car-park area should simply be removed from consideration. My client wishes the Licensing Sub-Committee, if necessary, to determine that aspect of the application on the evidence available to it.

2. **Zebu Butchers' position concerning the representation made by Unit 25**

I have also reviewed the representation made by the neighbouring premises at Unit 25, associated with Bar Simprao Ltd trading as Recanto Kings.

That representation raises matters under all four licensing objectives, including:

1. prevention of crime and disorder;
2. public safety;
3. prevention of public nuisance; and
4. protection of children from harm.

The representation places particular reliance upon the physical proximity of the two premises, the proposed external area, vehicle movements, noise, alcohol consumption and the perceived cumulative effect of the proposed variation. The representation itself expressly raises concerns about the interaction between customers, vehicles and children in the external area.

Zebu Butchers does not object to legitimate representations being made by neighbouring businesses. However, representations must be considered by reference to reliable and relevant evidence, and my client is increasingly concerned that a number of assertions made by the Unit 25 representative are materially inconsistent with information and evidence presently held by Zebu Butchers.

3. **Evidence concerning the four licensing objectives**

My client is presently in possession of material which is relevant to the credibility, factual accuracy and evidential weight of a number of matters advanced by Unit 25.

Without prejudging the Licensing Sub-Committee, that material includes evidence relevant to:

Crime and disorder:
Material concerning incidents, allegations, complaints and other matters associated with Unit 25 and/or its operation which, if relied upon by Zebu Butchers, are capable of materially affecting the weight that should properly be attached to assertions made by Unit 25 concerning crime and disorder.

Public safety:
Material concerning the management and operation of Unit 25 and matters relevant to the safety arrangements relied upon by that premises.

Public nuisance:
Material concerning noise, disturbance, customer activity and other matters which Zebu Butchers considers relevant to the allegations made by Unit 25 concerning nuisance arising from the proposed variation.

Protection of children from harm:
Material concerning the operation and management of Unit 25 which Zebu Butchers considers relevant to the assertions made concerning the protection of children.

I emphasise that I do not presently ask the Council to accept these matters merely because they are asserted by my client. Rather, Zebu Butchers is prepared to place the underlying evidence before the Licensing Authority so that the matters can be assessed objectively.

4. Request to Bar Simprao Ltd / Recanto Kings to reconsider its representations

In light of the material now available to my client, I invite Bar Simprao Ltd trading as Recanto Kings, and/or its representative, to reconsider the representations presently maintained against Zebu Butchers and to withdraw them before the hearing, particularly where the factual basis for an allegation cannot be maintained in light of the evidence.

This is not intended to prevent Unit 25 from raising legitimate concerns. Rather, it is an opportunity to ensure that the hearing is not unnecessarily occupied by allegations which may be materially undermined by documentary, photographic, CCTV, correspondence, regulatory or other evidence available to the parties.

I would therefore invite Unit 25 to review its representations in light of the evidence and confirm, before the hearing, whether it intends to maintain each substantive allegation made against Zebu Butchers.

5. If the representations are maintained

If Unit 25 elects to maintain its representations, my client wishes to make clear now that it will respond substantively to those allegations and place relevant evidence before the Licensing Sub-Committee.

That evidence may include material concerning the operation and management of Unit 25 where such material is directly relevant to matters raised by Unit 25 itself.

In particular, where Unit 25 relies upon its own arrangements, conduct, experience or alleged impact upon the four licensing objectives in support of its objection to Zebu Butchers, Zebu Butchers reserves its position to place before the Licensing Authority evidence which materially contradicts, qualifies or contextualises those assertions.

This is particularly important where the evidence may demonstrate that the factual circumstances relied upon by Unit 25 are evidence to their own behaviour instead of facts that they might be concerned from a different business.

I also draw attention to the fact that the material already contained within the bundle identifies previous regulatory and licensing involvement concerning the premises opposite, including reference to a premises licence review brought by Home Office Immigration Enforcement.

I do not suggest that historical regulatory matters should automatically be treated as evidence of present wrongdoing by the current management of Unit 25. Equally, however, Unit 25 cannot reasonably rely upon allegations concerning Zebu Butchers while simultaneously seeking to prevent relevant and properly evidenced matters concerning its own operation from being considered.

To the extent that any matters are subject to ongoing enquiries or investigations by Brent Council, the Metropolitan Police or the Home Office, Zebu Butchers reserves the right to provide relevant information and supporting evidence to the appropriate authority, subject of course to any applicable restrictions on disclosure.

6. **Zebu Butchers' position remains that the application should be determined on its own evidence**

For completeness, Zebu Butchers accepts that the Licensing Authority must determine this application by reference to the Licensing Act 2003 and the four licensing objectives. The application should be considered based on their own determinations and based also on reliable representations. Representations from Unit 25 continue to be considered been made on bad faith to avoid the opening a business with some similar operations.

The existing material already submitted on behalf of Zebu distinguishes the operation of Zebu Butchers from the independently operated premises at Unit 25 and asks that the application be determined on the basis of Zebu's own management, operating arrangements and evidence. We do not accept any connection with business from Unit 25. We maintain that morality and ethic of our business is completely different to the business at Unit 25 and therefore we do not held any responsibility of their acts. As the same, we do not intend to accept any of their allegations or concerns about our operational business based on all material we hold from the beginning of their business until these days.

That remains our position.

At the same time, where the neighbouring premises has itself placed its operation, management and surrounding environment in issue through its representations, Zebu Butchers is entitled to respond to those matters with relevant evidence.

We are currently in a position in which we can remind the Licensing that from more than 40 business around, the unique representation came live from a business who has been (and is currently) more than 1 year under investigation for several breaches. The other business have not made any objection to the application to vary licence of my client. This should be taken into consideration at the time of weighting the representations received.

The continued pattern of misconduct from the Unit 25 should be enough to confirm that they are unreliable witness. According to the history of dishonesty or systemic non-compliance, a judge or tribunal panel may find their accusations against my client inherently untrustworthy.

7. **Next steps**

I would therefore be grateful if the Licensing Authority could:

1. record that I am now acting as the principal point of contact for Zebu Butchers in this matter;
2. record that Zebu Butchers does not withdraw the proposed extension of the licensed area to include the Unit 38 private car park;
3. circulate this correspondence to the relevant parties and place it on the licensing file;

4. provide confirmation of the current procedural timetable and hearing arrangements; and

5. confirm any deadline by which Zebu Butchers' further evidence and hearing bundle must be submitted.

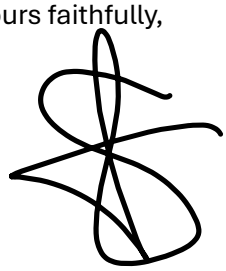
I also want to remind Bar Simprao Ltd t/a Recanto Kings that I invite them to review its representations in light of the above and confirm whether it intends to withdraw any or all of its representations before the hearing.

If the representations are maintained, Zebu Butchers will proceed on the basis that the factual matters raised are contested and will place the relevant evidence before the Licensing Sub-Committee in response. For the avoidance of doubt, the purpose of placing this evidence before the Licensing Authority is not to support any investigation against Unit 25, but to demonstrate that its representations are made in bad faith and appear intended to prevent or restrict my client's legitimate business growth. Zebu Butchers respectfully asks the Chair, the Licensing Sub-Committee and the Council to consider what evidential weight should properly be given to representations made by a party whose own conduct may materially contradict the standards it seeks to impose on others.

Nothing in this correspondence should be taken as a waiver of any of my client's rights, remedies or evidential position, all of which are expressly reserved.

I look forward to dealing constructively with the Licensing Authority and the other parties going forward.

Yours faithfully,



Patricia de Farias Jimeno
07498589915
patricia@pfjconsultancy.co.uk
NALP 12588
ciol.org.uk/92599

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Sent: 16 October 2026 21:10
To: Legister, Linda
Cc: Business Licence; Jefferson Zebu
Subject: Re: Variation - Zebu Butchers, Unit 38 Sapcote Trading Centre, High Road, NW10 2DJ - 39346

Dear Linda,

I need to initially apologise for the late email, it has been due to network issues ongoing unfortunately.

As further information to be included I would like to separate them into 2 sections.

First Section - Zebu Butcher's Licence Variation.

According to what I have read through all paperwork and been discussed with both you and my client, future application for the Car Park will be made and will not be mentioned the matter during the hearing as is no longer part of the current application.

About the recorded music, I think has been a little misunderstanding. The recorded music that has been withdrawn is the one that was going to be positioned by the Car Park, but the small speaker that has been used for the whole life of Zebu Butchers remains as part of the application with the request to be playing until 23:00 which is the time that the deck that will be closed. Please find video named DECK_MUSIC_1 attached as evidence of the size of the speaker and the maximum volume possible.

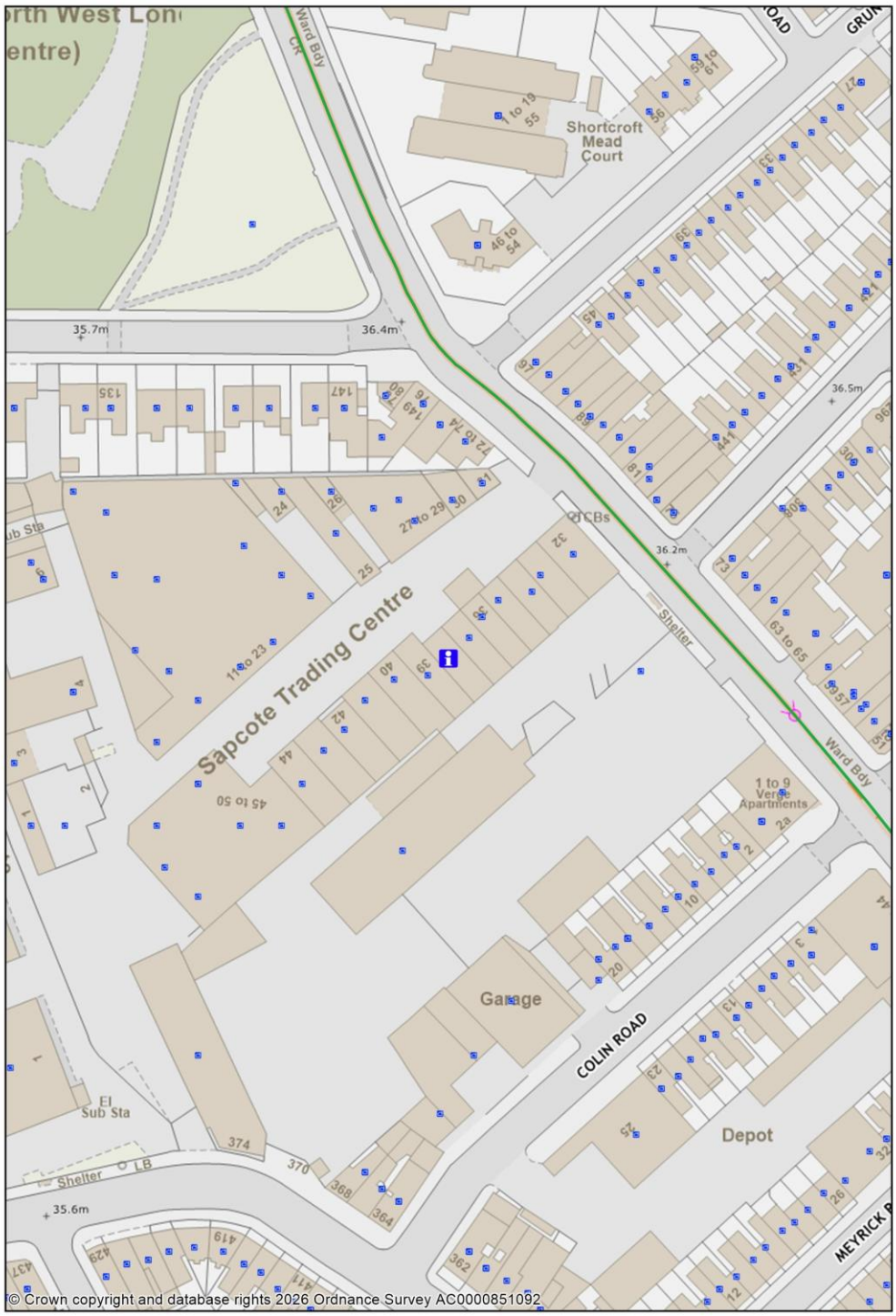
In terms of the usage of the Deck and its security, please find attached picture named DECK_ENTRANCE_ZEBU_1. Even the Car Park not being used as part of the licence, is important to note that is private area of Zebu Butchers and therefore the cones are limiting the space to control the entry of undesired people to the premises. Picture named CAR_PARK_ZEBU_1_IN and CAR_PARK_ZEBU_1_OUT shows it as evidence for crime and disorder prevention. Also attached is CAR_PARK_ZEBU_2_IN CAR_PARK_ZEBU_2_ OUT and to show how usually is the entry, showing clear corridor for in case of an emergency/fire. Emergency exit is exhibit as EMERGENCY_EXIT_ZEBU.

For our internal security and cctv devices to avoid too long video, I just recorded Zebu Butchers mobile phone showing the total of 13 cameras and where it points each one, exhibit as CCTV_ZEBU.

The books and manuals required are exhibit as MANUALS_ZEBU. Toilet facility for disabled people is attached as TOILET_DISABLED_SIGN and TOILET_DISABLED_INSIDE. Challenge 25 is positioned where the alcoholic drinks, exhibit as CHALLENGE25_FRIDGE. The other 2 displays are exhibit as

CHALLENGE25_TILL and CHALLENGE25_ENTRY. The display of each First Aid point is attached as FIRST_AID_1 and FIRST_AID_2. The necessity of the fire extinguisher by the BBQ and where the use of fryer is exhibit as FIRE_EXTINGUISHER_BBQ and FIRE_EXTINGUISHER_FRYER. The CCTV sign at the outside of the premises is exhibit as CCTV_SIGN.

Basemap Map



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Brent

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