

Hi Linda

If it is possible to respond to new points 3:12 to 3:14 please add the following as a final submission:

Waste Management

In point 3:12 it's stated that Mr Omid has an agreement with BIFFA for rubbish collection twice a week. The invoice supplied shows a delivery of 50 bags and these are then collected at a rate of one single bag per week on 9th, 16th and 23rd May 2023. It's also stated that they use Veolia though there is no evidence of the second additional contract. There was no attempt to dispute the photos of the staff member dumping black bag waste and loose cardboard.

The licensing committee may want to consider whether they think it's likely that a supermarket would only produce such a small amount of waste or whether it's more likely that the majority of waste is being flytipped on a daily basis and to ask Brent Enviro officers for an historical report of the premises over the last few years. Licensing officers could also detail historical breaches in the sale of alcohol at Westfield

The committee may also be aware that under these types of waste contracts, shops pay per full bag of waste they present. Therefore there is an incentive for businesses to obtain a contract (which they can show to a Brent Enviro officer) but to actually use as few bags as possible. They may even put out one legal bag of trade waste in a branded bag and several other ordinary black bags of waste. Whereas a trade waste contractor may only collect once or twice per week, the black bags of waste will be treated as domestic rubbish from flats above shops and collected by Brent twice daily. This cost then falls on the council and ultimately on residents

Deliveries

There was no attempt to dispute the photo evidence of the deliveries including on 27 Aug 2023, indeed it's stated that "Mr Omid use your own can for his own deliveries". Whatever the vehicle type, whether a truck, van or car it is illegal to load or unload at any time on this section of highway from outside the shop down to the Tubbs Rd corner. Mr Omid acknowledged this at the Westfield licence hearing in 2021 and claimed deliveries were done from Clifton or Furness Rds

In summary, the applicant has demonstrated time and again he does not act in good faith and it is expected this will continue if granted a further premises licence.

Kind regards