

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

28 August 2025

Ref: 35660

Dear Business Licence,

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

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

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

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

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

Proposed Operating Schedule

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

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

- Staff training

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

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

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

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

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

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

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

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

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

Cumulative Impact Zone (CIZ)

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

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

The purpose of these CIZs is to address levels of crime, disorder, and anti-social behaviour, particularly related to street drinking. Consequently, the CIZs will specifically pertain to new

applications and variations for off-licences, thereby creating a “rebuttable presumption” to any new application with a recommendation of refusal, unless the applicant can successfully demonstrate within their operating schedule that this wouldn’t be the case.

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

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

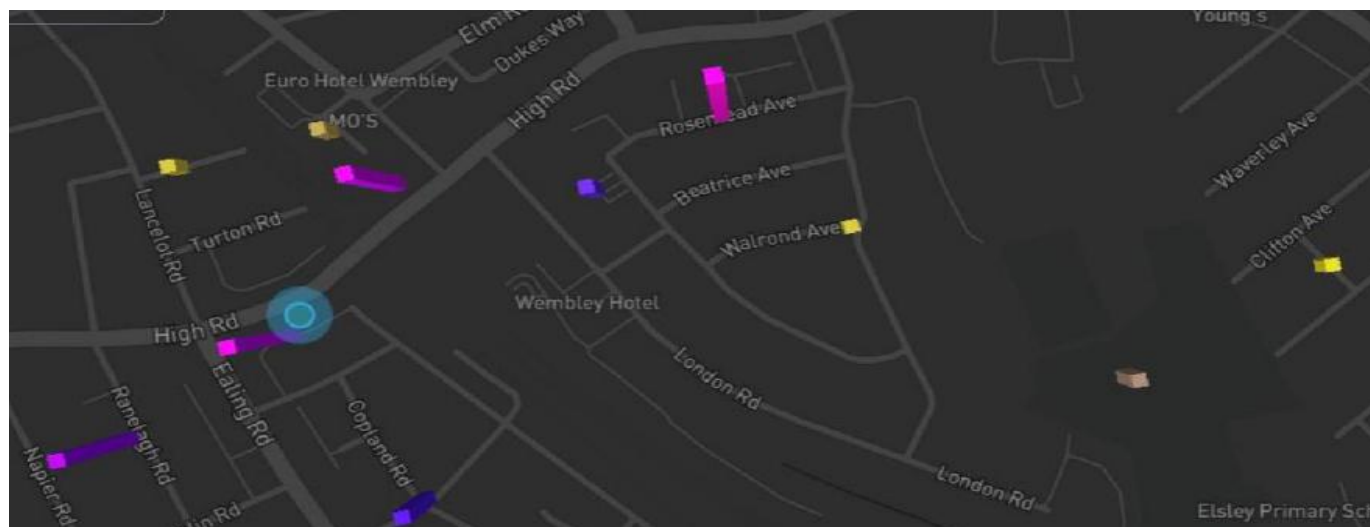
The relevant CIZ includes the entirety of Harrow Road, from the junction with the A406 North Circular to Wembley High Road and the surrounding area.

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

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

- 279 reports to the Police
- 118 relates to anti-social behaviour
- 39 related to public order offences
- 18 related to robbery
- 104 categorised as violent/sexual offences.

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



Public Space Protection Order (PSPO)

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

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

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

However, there are limited police officer resources, which in practice would prevent the above from being enforced. This therefore places a greater emphasis on the responsibility of those premises that are selling alcohol for consumption off the premises. If off licences did not exist, the number of street drinkers would decline.

Location

The premises is located at 327 Harrow Road, HA9 6BA, within a ground-floor commercial unit beneath a residential block of flats, in a parade of shops close to Wembley Triangle. Opposite the premises is another parade of shops, including an existing off-licence and food-led businesses.

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



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

Triangle Food & Wine, 1 Wembley Hill Road, HA9 6QU (Premises licence number: 175893)
 Permitted Hours: 08:00 – 00:00 (Monday to Saturday) 10:00 – 22:30 (Sunday)
 Distance: 28 Metres

Brother's Superstore, 4 Wembley Hill Road, HA9 6QU (Premises licence number: 157127)
 Permitted Hours: 08:00 – 23:00 (Monday to Saturday), 10:00 – 22:30 (Sunday)
 Distance: 41 Metres

Shree Superstore, 11 Wembley Hill Road, HA9 8AF (Premises licence number: 251453)
 Permitted Hours: 09:00 – 00:00 (Monday to Sunday)
 Distance: 81 Metres

Wembley Convenience Store, 297 Harrow Road, HA9 6BD (Premises licence number 274903)
Permitted Hours: 00:00 – 00:00 (Monday to Sunday)
Distance: 110 Metres

Jeen Cash & Carry, 306 Harrow Road, HA9 6LL (Premises Licence Number: 161693)
Permitted Hours: 00:00 – 00:00 (Monday to Sunday)
Distance: 110 Metres

Summary

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

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

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

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

Yours sincerely,

A handwritten signature in dark ink, appearing to read 'E. Maldoom', with a horizontal line drawn underneath it.

Edwin Maldoom
Licensing Enforcement Officer

The prevention of crime and disorder

1. The premises shall operate and maintain a digital colour CCTV system. The CCTV system shall continually record whilst the premises are open for licensable activities and all recordings shall be kept for 31 days. The CCTV system shall also display the correct date and time on any recordings.
2. The CCTV system shall capture clear images of every person entering or leaving the premises with further CCTV cameras covering the publicly accessible areas stipulated on the premises plan, including the front external area.
3. CCTV footage shall be made available for immediate viewing upon request by the Police and any authorised Officers from Brent Council by a member of staff who is conversant with the operation of the CCTV system. CCTV footage shall also be provided to the Police and any authorised Officers from Brent Council, in a readily accessible format on removable media (i.e., USB, hard drive, CD etc..) or via digital transfer within 24 hours of request.
4. A notice stating that CCTV is in operation shall be clearly and prominently displayed.
5. An up-to-date incident log shall be kept and maintained at the premises which shall record the following:
 - a. any incidents of crime and disorder.
 - b. any customers barred from the premises.
 - c. any complaints received.
 - d. any faults in the CCTV system
 - e. any visit by a relevant authority or emergency service.

Any entries into the log shall be made within 12 hours of any incident and shall contain the time/date of the incident, the nature of the incident, a description of the people involved, the action taken and details of the person responsible for the management of the premises at the time of the incident. The incident log shall be available for inspection upon request by an authorised officer of Brent Council or the Police

6. A logbook shall be kept recording all refused sales of alcohol. The log shall contain the time/date of the refusal, a description of the customer, the name of the staff member who refused the sale, the reason the sale was refused and any other relevant observation. The refusals register shall be made available for inspection upon request of an authorised officer of a Brent Council and the Police.
7. Staff training shall be undertaken by all members of staff involved in licensable activities. All staff shall also undergo refresher training at least once every 12 months, with all training recorded. Training shall include the following topics:
 - a. age verification policy and prevention of proxy sales.
 - b. recognising signs of drunkenness, intoxication, and identifying habitual street drinkers.
 - c. procedures for recording refused sales relating to (a) or (b), and conflict management.
 - d. the four licensing objectives.
 - e. operating procedures, permitted hours, and premises licence conditions.

Training records shall include the time/date of the training, staff members name, training topic and must be signed off by the relevant staff member and the premises licence holder. A copy of staff training shall be available upon request by Police and authorised officers from Brent Council.

8. A register shall be kept recording all refused sales of alcohol. The register shall contain the time/date of the refusal, a description of the customer, the name of the staff member who refused the sale, the reason the sale was refused and any other relevant observation. The refusals register shall be made available for inspection upon request of an authorised officer of a Brent Council and the Police
9. The DPS shall produce a written list of all staff members who are trained and authorised to sell alcohol on behalf of the DPS. This list shall have the staff members name, the signature of the staff member and the authorisation date.
10. There shall be no self-service of spirits on the premises with all spirits being located behind counter.
11. There shall be no sales of beers, ales, lagers, or ciders above 6.0% ABV.
12. There shall be no sales of any single cans or bottles of beer, or cider. A notice advising customers of this policy shall be displayed.
13. There shall be no sales of any spirit miniatures under 5cl or wine under 200ml. A notice advising customers of this policy shall be displayed at the point of sale.
14. A personal licence holder shall be at the premises at all times whilst open for licensable activities.
15. The premises licence holder shall display notice warning customers against drinking on the street in line with Brent Council's Public Spaces Protection Order.

Public safety

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

The prevention of public nuisance

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

The protection of children from harm

18. A Challenge 25 proof of age scheme shall be operated at the premises where the only acceptable forms of identification are recognised photographic identification cards, such as a driving licence, passport, or proof of age card with the PASS Hologram. A Challenge 25 notice shall be also conspicuously displayed at the point of sale.
19. Notices shall be conspicuously displayed at the point of sale reminding customers that proxy sales are unlawful.