

From: Maldoom, Edwin
Sent: 09 September 2025 10:43
To: Sai Archi
Cc: Business Licence; Legister, Linda
Subject: RE: CONSULT: New Premises - Sangit Express, 327 Harrow Road, HA9 6BA - 35660

Good morning Raj,

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

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

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

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

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

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

Many thanks,

Edwin Maldoom
Licensing Enforcement Officer
Regulatory Services
Brent Council

www.brent.gov.uk

@Brent_Council

From: Sai Archi
Sent: 03 September 2025 12:06
To: Maldoom, Edwin
Cc: Business Licence; Legister, Linda
Subject: Re: CONSULT: New Premises - Sangit Express, 327 Harrow Road, HA9 6BA - 35660

GM Edwin

Hope you are well.

Thank you for the email and reply.

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

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

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

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

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

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

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

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

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

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

A personal LICENCE holder as a DPS for the premises.

The premises will have a refusal logbook on site

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

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

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

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

If you need any further information let us know.

Thanks &

Regards

RAJ

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

RAJ JAGTAP - Principal
Architect

MSc In Urban Design, The Bartlett, UCL

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

Good afternoon Raj,

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

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

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

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

Many thanks,

Edwin Maldoom
Licensing Enforcement Officer
Regulatory Services
Brent Council

From: Sai Archi <
Sent: 28 August 2025 12:38
To: Business Licence
Subject: Fw: CONSULT: New Premises - Sangit Express, 327 Harrow Road, HA9 6BA - 35660

Hi Sima

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

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

Licensing Authority's Proposed Conditions for Licensing Sub-Committee

The prevention of crime and disorder

1.The premises shall operate and maintain a digital colour CCTV system. The CCTV system shall continually record whilst the premises are open for licensable activities and all recordings shall be kept for 31 days. The CCTV system shall also display the correct date and time on any recordings.

2.The CCTV system shall capture clear images of every person entering or leaving the premises with further CCTV cameras covering the publicly accessible areas stipulated on the premises plan, including the front external area.

3.CCTV footage shall be made available for immediate viewing upon request by the Police and any authorised Officers from Brent Council by a member of staff who is conversant with the operation of the CCTV system. CCTV footage shall also be provided to the Police and any authorised Officers from Brent Council, in a readily accessible format on removable media (I.e., USB, hard drive, CD etc..) or via digital transfer within 24 hours of request.

4.A notice stating that CCTV is in operation shall be clearly and prominently displayed.

5.An up-to-date incident log shall be kept and maintained at the premises which shall record the following:

- a.any incidents of crime and disorder.
- b.any customers barred from the premises.
- c.any complaints received.
- d.any faults in the CCTV system
- e.any visit by a relevant authority or emergency service.

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

6.A logbook shall be kept recording all refused sales of alcohol. The log shall contain the time/date of the refusal, a description of the customer, the name of the staff member who refused the sale, the reason the sale was refused and any other relevant observation. The refusals register shall be made available for inspection upon request of an authorised officer of a Brent Council and the Police.

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

- a.age verification policy and prevention of proxy sales.
- b.recognising signs of drunkenness, intoxication, and identifying habitual street drinkers.
- c.procedures for recording refused sales relating to (a) or (b), and conflict management.
- d.the four licensing objectives.
- e.operating procedures, permitted hours, and premises licence conditions.

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

8.A register shall be kept recording all refused sales of alcohol. The register shall contain the time/date of the refusal, a description of the customer, the name of the staff member who refused the sale, the reason the sale was refused and any other relevant observation. The refusals register shall be made available for inspection upon request of an authorised officer of a Brent Council and the Police

9.The DPS shall produce a written list of all staff members who are trained and authorised to sell alcohol on behalf of the DPS. This list shall have the staff members name, the signature of the staff member and the authorisation date.

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

11. There shall be no sales of beers, ales, lagers, or ciders above 6.0% ABV.

12. There shall be no sales of any single cans or bottles of beer, or cider. A notice advising customers of this policy shall be displayed.

13. There shall be no sales of any spirit miniatures under 5cl or wine under 200ml. A notice advising customers of this policy shall be displayed at the point of sale.

14. A personal licence holder shall be at the premises at all times whilst open for licensable activities.

15. The premises licence holder shall display notice warning customers against drinking on the street in line with Brent Council's Public Spaces Protection Order.

Public safety

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

The prevention of public nuisance

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

The protection of children 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.

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

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

The premises will have a refusal logbook on site

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

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

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

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

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

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

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

Thanks &

Regards

RAJ

SAI ARCHITECTS & ASSOCIATES - CONSULTANTS - CHARTERED

SPACE ARCHITECTURE & INTERIORS

(LABC PARTNER WITH BRENT BLDG CONTROL)

RAJ JAGTAP - Principal
Architect

From: swati thakkar

To: Sai Archi

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

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

Dear sirs

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

Yours sincerely

SWATIBEN J THAKKAR

DPS