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

2 March 2026

Ref: 37314

Dear Business Licence,

**Licensing representation against the premises licence application in respect of Akshar Food & Wine, Unit 15, 87 Ealing Road, HA0 4BD.**

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 might have a detrimental effect on one of the four below licensing objectives:

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

Proposed Operating Schedule

The premises licence application seeks to permit the supply of alcohol for consumption off the premises between 09:00 and 23:00, Monday to Sunday.

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

- An age verification policy
- Robust CCTV provisions
- Recorded staff training

- Use of a refusals log
- Use of an incident log
- Restriction on beer, lager, or cider above 6.0% ABV
- Restriction on the sales of alcoholic miniatures
- Restriction on sales of single can/bottle sales of beer and cider (below 500ml)
- Restriction on alcohol advertising in the shop frontage
- Measures to ban known street drinkers where possible
- Limitation on alcohol on display to 15% of sales area

As such, some of the proposed conditions represent standard practice for an off-licence (i.e., CCTV provisions, an age-verification policy, an incident/refusals log, etc.). In addition, the other more restrictive measures put forward (i.e., restrictions on beers/ciders above 6.0% ABV, the prevention of alcoholic miniature sales, restrictions on single can/bottle sales, and the reduction of shop spaced designated to alcohol sales) suggest that the applicant has considered some of the expectations for premises located within a Cumulative Impact Zone (CIZ).

Furthermore, the application makes explicit reference to the Ealing Road Cumulative Impact Zone, the reasons for its implementation, and the fact that the entire borough is subject to a Public Spaces Protection Order (PSPO) which makes it an offence to fail to comply with a request from an authorised person to cease drinking or to surrender alcohol in a public place. The application also lists nearby similar off-licences within a 0.3-mile radius. The applicant argues that the quantity of alcohol it intends to sell will not materially increase the overall availability of alcohol in the locality, and therefore its operation will not negatively impact the licensing objectives should the premises licence application be granted. It is further stated that the sale of alcohol will ordinarily be ancillary to the purchase of other household items and groceries

### Informative

There is an existing premises licence in place for Trader Wembley, 87 Ealing Road, HA0 4BN (Premises Licence Number: 27900), granted on 11 May 2023 and held by DC Mart Ltd. This premises licence authorises the licensable activities for plays, films, indoor sporting events, boxing or wrestling entertainment, live and recorded music, performances of dance, late night refreshment (indoors), and the sale of alcohol for both on and off the premises between 06:00 – 23:00 Sunday to Thursday and, 06:00 – 02:00 on Friday and Saturdays.

Whilst it could be argued that this premises licence could act as a shadow licence, as referenced in the operating schedule of the application - thereby allowing the applicant to possibly and lawfully operate under its terms (subject to the agreement of the existing premises licence holder), it is important to note that the conditions of this premises licence are primarily focused on on-sales rather than off-sales.

### Cumulative Impact Zone (CIZ)

In 2022, Brent Council reviewed its Cumulative Impact Policy after assessing crime data from various sources. This led to the implementation 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.

### Ealing Road, Wembley

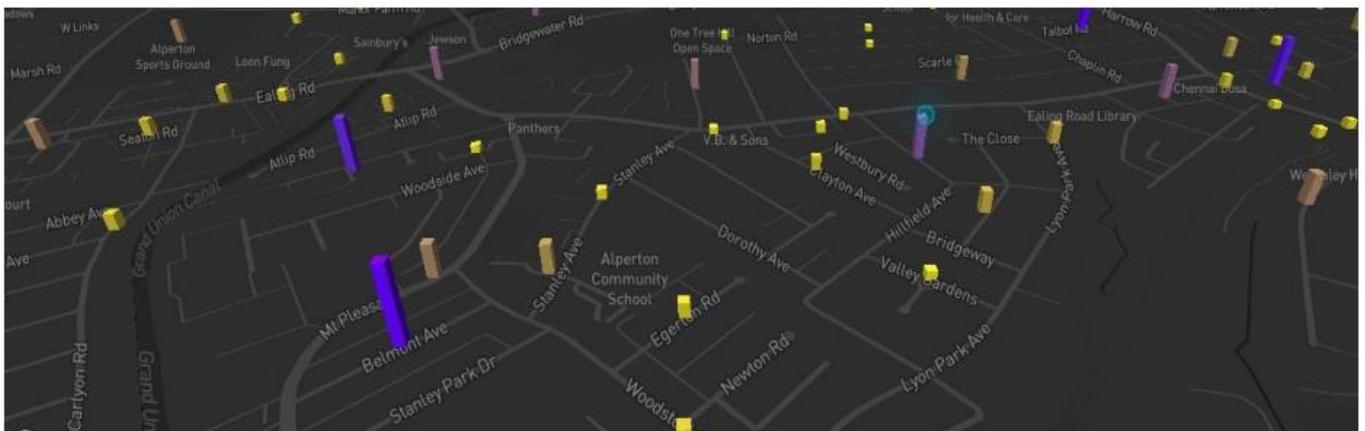
The CIZ that relates to the local area encompasses the entirety of Ealing Road, from the junction with High Road, Wembley to the junction with Bridgewater Road

Brent Council’s Statement of Licensing Policy describes this area as having medium to high levels of deprivation and being a hotspot for alcohol-related calls to police. It is also a high reporting area for street drinking and anti-social behaviour.

Between 1 July 2021 and 30 June 2022, there were:

- 183 reports to the Police
- 72 relates to anti-social behaviour
- 11 related to public order offences
- 9 related to robbery
- 91 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 Unit 15 within 87 Ealing Road, HA0 4BD, on the ground floor of Trader Wembley, a medium-sized commercial complex comprising of a variety of food-led businesses operating as individual units.

The complex itself is situated along a busy stretch of Ealing Road and lies at the start of a busy parade of shops, including an existing off-licence, several food-led businesses, and a range of other retail outlets.



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

Wembley Off Licence, 95 Ealing Road, HA0 4BN (Premises licence number: 10437)  
Permitted Hours: 09:00 – 23:00 (Monday to Sunday), Distance: 15 metres

Ealing Newsagent, 154 Ealing Road, HA0 4PY (Premises licence number: 18064)  
Permitted Hours: 09:00 – 23:00 (Monday to Sunday), Distance: 41 metres

Sidney's Off Licence, 216 Ealing Road, HA0 4QG (Premises licence number: 156261)  
Permitted Hours: 08:00 – 23:00 (Monday to Saturday), 10:00 – 22:30 (Sunday), Distance: 236 metres

Best Foods, 11A - 13 Ealing Road, HA0 4AA (Premises licence number 331624)  
Permitted Hours: 00:00 – 00:00 (Monday to Sunday), Distance: 550 metres

Ganapathy Cash & Carry, 34-38 Ealing Road (Premises licence number 160436)  
Permitted Hours: 08:00 – 23:00 (Monday to Saturday), 10:00 – 22:30 (Sunday), Distance: 500 metres

### Summary

The Licensing Authority acknowledges that this application proposes robust conditions, reasonable operating hours, makes explicit reference to its location within a Cumulative Impact Zone, asserts that alcohol sales will be ancillary to the primary business model, and is situated within a wider commercial unit where internal lease arrangements may create expectations from the landlord aimed at preventing issues arising in the vicinity.

It is further noted that the business could, in theory, lawfully operate under the existing premises licence for Trader Wembley, 87 Ealing Road, HA0 4BN (Premises Licence Number: 27900), subject to the agreement of the current premises licence holder.

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

While this application might ordinarily be granted without issue if it were located outside a CIZ, the Licensing Authority is of the view that no compelling evidence has been presented to demonstrate that granting the licence would not add to cumulative impact. Furthermore, it is not considered that sufficient justification has been provided to depart from the CIZ policy / Statement of Licensing Policy. It is also noted that the proposed application does not appear to represent a niche or specialist retail business model, but rather a small supermarket offering a range of food and household items.

As such, the Licensing Authority submits this representation to engage the discretion of the Licensing Sub-Committee and respectfully reminds the Sub-Committee of the Council's position regarding new premises licence applications within a CIZ as set out within the Statement of Licensing Policy.

Ultimately, although the application is clearly well considered, the Licensing Authority believes that granting it would contribute to the cumulative impact in the local area, thereby undermining the licensing objective of the prevention of crime and disorder.

Therefore, the Licensing Authority's view is that the application should be refused. However, should the Sub-Committee be minded to grant the application on the basis that sufficient evidence is provided to demonstrate that it would not add to cumulative impact and that a departure from policy is justified, it is respectfully requested that the conditions set out at the end of this representation, largely consistent with those proposed by the applicant, be imposed in full.

Yours sincerely,



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 28 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 sales of beers, ales, lagers, or ciders above 6.0% ABV
11. There shall be no sales of any single cans or bottles of beer or cider in sizes less than 500ml. A notice advising customers of this policy shall be displayed.
12. No spirits or wine shall be available for self-service. All such products shall be stored behind the counter and supplied only by staff upon request. There shall be no sales of spirit miniatures under 35cl or wine under 200ml. A notice advising customers of this policy shall be displayed at the point of sale.
13. There shall be no promotions, discounts, or price-led incentives shall be offered in relation to the sale of alcohol. There shall also be no external advertising of alcohol displayed on or adjacent to the premises, including on windows, doors, signage, or street-facing structures.
14. All alcohol exposed for sale shall only be confined to the areas denoted on the premises plan.
15. Staff shall take reasonable steps to discourage street drinking of alcohol directly outside the premises and shall refuse service to individuals who engage in such behaviour.
16. 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

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

#### The prevention of public nuisance

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

#### The protection of children form harm

19. 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.

20. Notices shall be conspicuously displayed at the point of sale reminding customers that proxy sales are unlawful.
21. Any tills in operation at the premises shall automatically provide age-related prompts to staff to verify the age of the customer when alcoholic products are scanned or otherwise entered into the till for sale