

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.