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Wraps & Wings Premises Licence Application
92 Field End Road, Eastcote, HA5 1RL

20th April 2023

Dear Sirs,

I write to you on behalf of my client Pinner Service Ltd, the applicant for the above premises licence.

We would like to thank you for taking the time to write as this assists my client greatly in a number of ways, such as establishing relationships and reaching out to explain his business in a more personable manner than the application permits.

In this letter we'd like to explain a little of the history and ethos of the applicant and why we have arrived at the application stage.

Mr Abedin has operated this Wraps & Wings as a franchisee since May 2019, nearly four years. He has always provided a delivery service during all opening hours and used agents such as Just Eat, Deliveroo etc. Until the Autumn of 2021 the premises shut as expected at 11pm each day. There had been no complaints and his business was running well. Unfortunately, he took poor advice and was of the belief that as he was not selling alcohol, he did not require a licence to operate to the early hours.

From the Autumn of 2021 he started to open till 1am during the week and 2am at weekends. There were no complaints until last summer when one resident brought the noise of delivery agents to his attention. Unfortunately, the agent could not be identified so he spoke to the agents individually to inform them that he had received a complaint.

There were no further complaints for some time until a few months ago when the same resident raised concerns. This ended with a visit from the local authority and the realisation that he was operating without a licence.

From that moment on the premises has closed at 11pm each day.

It was at this time that Mr Abedin contacted me, and we had a long discussion, reiterating what the council officers had stated as to what he could/could not do and that he would need to apply for a licence. He is now fully aware of his responsibilities as a potential licensee and is full conversant with what has been offered in the robust operating schedule.

I have also assisted other Wraps & Wings premises, the majority of which are not franchises. These other premises have varying opening hours and in comparison, this premises is very similar to those in East London. They are situated in shopping parades below residential properties; Stratford is licensed to 5am and Canary Wharf is licensed to 2am. Both premises operate in the same manner that this application seeks. The doors close to customers and only deliveries are permitted thereafter until closing. There have been no complaints from residents at either of these premises. In fact, there are no complaints across any of the Wraps & Wings premises, all of whom operate in similar fashion.

The main reason that other sites have not recorded complaints is the manner in which they conduct deliveries. Where their sites are close to residential properties, they carry out deliveries with 'in house' staff. This affords them complete control over the delivery staff. The delivery drivers from outside agencies have no ownership over the company they are delivering for, nor the product. If there is a complaint against a driver, in the majority of cases that driver will either never know, or carry on as usual – it makes no impact on them. By having control over the delivery drivers (and in some cases the owners doing it) there is ownership and responsibility not just toward the customer receiving their goods but, toward residents, businesses and neighbours to the business.

Once this is in place delivery drivers/riders are briefed as to what the Wraps and Wings business expects. There are severe consequences for them breaching the expected standards of the brand. During licensable hours either bicycles or electric vehicles are used. Doors are not slammed, conversation takes place inside buildings, never outside,

customers receiving the goods are informed that they will be contacted by text when the delivery is outside. Doors without bells are not knocked – drivers will text or call and speak quietly to let the customer know they are outside and to open the door. During licensable hours Wraps & Wings operate what they call, 'silent delivery'.

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If there is ever an issue with a delivery, all of their products are clearly marked and the complaints, rather than generic to the local authority, can be directed squarely back at Wraps & Wings. Complete ownership and responsibility.

The owner accepts that he was trading without a licence and was extremely embarrassed that he was misinformed. It is however relevant that during that time, on average 20-30 deliveries were made during the week after 11pm and 30-40 at the weekend. The premises had been operating like this for 18 months, and during that time only 1 person complained to the owner. The premises has been open for several years and has only ever had that 1 person complain. Given that the premises is situated (as noted within the reps) below numerous flats, we believe it is testament to the manner in which the business has conducted itself in that it has only had that 1 complaint.

1 too many in our opinion, and which is why to be sure we have submitted a freedom of information request to the local authority to establish if there have been other complaints that the owner is not aware of and we will address if need be. As far as we are aware no resident or business in the parade where the business is located has objected to this application.

With the newly implemented methods of delivery the applicant is confident that coupled with the robust operating schedule, they will become like that of the other Wraps & Wings branches, entirely without complaint.

With regard to the points you raise I would like to respectfully discuss each one individually all of which are understandable concerns. Some of these points have crossed over from different representations.

Public Nuisance

As stated, there is not a high number of deliveries – and scooters will not be used negating that concern.

We are unable to deal with any issues unless they are brought to our attention. Only 1 resident has ever been disturbed that we are aware of as only one complaint has ever come forward. Therefore, it would seem that the operation thus far has not caused as much disturbance as one might predict.

Over the numerous Wraps & Wings venues across the country not one venue has ever experienced crowds gathering nor it being a place where people congregate. Wraps & Wings is not your typical ‘fast food’ premises. It is often the supposition that these venues attract problems and there is usually no proof other than us pointing people in the direction of other branches. But the proof is here, in the last 18 months there were no gatherings, or disturbances – and if there were a potential rise in crime due to their business operation one would expect the police to object as the evidence would have been before them.

Most of the bars etc in Eastcote close at midnight

That is exactly what Wraps & Wings have proposed to do, close at midnight and offer delivery only thereafter – hopefully that resolves the concern of venues opening beyond midnight.

Delivery Drivers Knocking on the wrong door

Deliveries are made after payment to the address requested. The vast majority of pranks are carried out before payment. This is why we ensure payment is taken before the order is prepared. This business have never delivered to the wrong address and as stated, banging on doors after midnight does not happen with wraps & Wings.

Noisy scooters at 2am

As stated, there will be no use of such scooters.

These premises have been known as Wraps and Wings for several years.
This is Not a new premises; it is false representation.

At no point in our application does it state that this is a new premises, it *is* a 'new premises licence application', not a new premises.

Some of the concerns are generic of delivery companies and given the manner in which some businesses operate, entirely understandable. Wraps & Wings have eliminated that concern by taking complete control of their deliveries.

The applicant has what they consider to be a very different ethos to other operators of similar businesses. The brand have watched, listened and learned to shape the protocols of their business.

They take a pride in their appearance which is not always associated with such venues. The applicant has volunteered conditions within their schedule to ensure the vicinity of their premises are kept clean and tidy, regularly instructing staff to exit the premises and ensure there is no litter. This instruction does not merely extend to any of the litter created by their own business, which is extremely rare but also to ANY litter in the immediate vicinity. It is a case of having pride in their appearance and surroundings. The applicant enforces that ALL food to be taken away will be wrapped and bagged by staff, and not left open to be consumed immediately. Wraps & wings experience over the years has shown that ensuring the products are wrapped and bagged on exit of the customer leads to encouraging the customer to not consume the food until they have reached their destination/home.

The applicant also ensures staff are fully trained in signs of intoxication, how to deal with aggressive customers, conflict management and how to provide care for customers in a variety of situations.

For such a small independent business, the attention to detail to ensure not just licensing compliance, but to ensure a good relationship with neighbours and other businesses is exceptional. Anyone unhappy with the manner in which my client manages his business is a potential lost customer, and that is business suicide.

At the foot of this letter, you will see the operating schedule that has been volunteered as part of this variation to the licence. Therefore, we hope you would agree, that the licence if granted, would not just be covered by the standard operating procedures of Wraps and Wings but also covered by these safeguards held within the conditioning of the licence.

Please note that with the inclusion of the 'silent delivery' being adopted, condition 19 will be amended to

The licensee undertakes to employ their own delivery drivers/riders whereby deliveries will only be delivered to the registered address as per the booking.

An additional condition will read;

After midnight, deliveries will be made either on foot, bicycle or by electric vehicles only.

Finally, Wraps and Wings take great pride in the fact that they operate differently to other such companies offering the same. As you can see, they have stringent expectations of their staff and have certain protocols in place to ensure minimise any potential disturbance.

Should you wish to discuss this application further or have any other questions please do not hesitate to contact me on the telephone number or email address below.

Kind Regards

Peter

Peter Conisbee Q.Inst.Pa
Licensing Consultant and Independent Commercial Energy Broker
www.pclicensing.co.uk

Wraps & Wings – Eastcote

92 Field End Road,

Eastcote,

HA5 1RL

Opening Hours -Monday to Sunday - 0700-0000

Hours of Licensable Activity - Monday to Sunday - 2300-0200

The doors to shut at midnight to the public, and delivery only till close of licensable activity.

Proposed Operating Schedule

1. The premises will close to the general public at 00:00 (midnight) to prevent any person walking into the venue. The kitchen may remain open, and the premises permitted to offer delivery via online order only until 0200 hours
2. The premises shall install and maintain a comprehensive CCTV system. All entry and exit points must be covered enabling frontal identification of every person entering in a light condition. The CCTV system shall continually record whilst the premises are open. All recordings shall be stored for a minimum period of 31 days with date and time stamping. Viewing of recordings shall be made available immediately upon the request of Police or authorised officer of the Council
3. A staff member from the premises who is conversant with the operation of the CCTV system shall be in the premises at all times when the premises is open. This staff member must be able to provide a Police or authorised council officer copies of recent CCTV images or data with the absolute minimum of delay when requested and within a maximum of 24 hours of the initial request.
4. Subject to Data Protection guidance and legislation, the management of the premises will ensure that key staff are fully trained in the operation of the CCTV, and will be able to download selected footage onto a disk/USB Stick for the Police or authorised officers of the Local Authority or UK Border Agency without difficulty, delay or charge.
5. Any CCTV breakdown or system failure will be notified to the Police and Local Authority immediately & remedied as soon as practicable. Repair records / invoices shall be kept on site for at least 12 months and be readily available to be viewed by all authorised persons upon request.

6. Notices shall be prominently displayed within the premises stating that CCTV is in operation.
7. An incident log shall be kept at the premises, and made available on request to an authorised officer of the Council or the Police, which will record the following:
 - a. all crimes reported to the venue
 - b. all ejections of patrons
 - c. any complaints received concerning crime and disorder
 - d. any incidents of disorder
 - e. any faults in the CCTV system
 - f. any visit by a relevant authority or emergency service.
8. No persons carrying open vessels of alcohol must be admitted to the premises at any time.
9. Adequate and appropriate supply of first aid equipment and materials must be available on the premises at all times.
10. A fire safety risk assessment will be completed as per government guidelines on an annual basis (**Regulatory Reform (Fire Safety) Order 2005**) And produced to authorised officers of the council, the Police and the Fire Service upon request.
11. Staff will attend to any spillages within the venue as soon as practicable to minimise risk of injury to customers.
12. The licensee will provide adequate bins for use by customers and encourage their use.
13. The removal of rubbish to outside the premises will not take place between 2200 hours and 0700 hours.
14. During licensable hours there will always be a minimum of two members of staff present.
15. Notices shall be prominently displayed at the exit requesting patrons to respect the needs of local residents and businesses and leave the area quietly.
16. Staff shall carryout regular checks,
 - i) To ensure the area immediately outside the premises is clear of litter
 - ii) To monitor customer behaviour
 - iii) To ensure there is no outbreak of noise from the premises.
17. Staff will be trained to identify signs of intoxication, suspicious or aggressive behaviour and how to appropriately deal with such customers so as to provide adequate care and minimise risk.
18. All such training is to be fully documented and signed by not only the employee but the person delivering the training. Refresher training across all points within the premises

licence take place every 12 months. Records shall be kept at the premises and made available upon request to either Police Officers or an authorised officer of Lambeth Council.

19. The licensee undertakes to use only experienced and reputable delivery companies whereby deliveries will only be delivered to the registered address as per the booking.
20. Delivery riders/drivers will be given clear, written instructions to use their vehicles in a responsible manner so as not to cause a nuisance to any residents or generally outside the licenced premises; not to leave engines running when the vehicles are parked; and not to obstruct the highway.
21. There will be no takeaway service of food for immediate consumption – all food taken away is to be closed/wrapped up.
22. A direct telephone number for the manager at the premises shall be publicly available at all times the premises is open.
23. No noise generated on the premises, or by its associated plant or equipment, shall emanate from the premises nor by vibration be transmitted through the structure of the premises which gives rise to a nuisance.
24. No fumes, steam or odours shall be omitted from the licensed premises so as to cause a nuisance to any persons living or carrying on business in the area where the premises are situated.