

LICENSING ACT 2003 HEARING THURSDAY 20TH AUGUST 2026 @ 09:30HRS
APPLICATION FOR THE GRANT OF A PREMISES LICENCE

1. Premises:

M & M Food and Wine
55 – 57 Wokingham Road
Reading
RG6 1LH

2. Applicant:

Mr Manpreet S Kapoor of Personal Licence Courses UK Ltd, on behalf of Kulwant Singh Gaba of M & M Food and Wine.

3. Background:

There is currently no licence in force at the premises. The Premises previously held a licence, but this was surrendered on 17 June 2026.

The application has been submitted on behalf of M & M Food and Wine and is attached as **Appendix MH001**.

4. Proposed licensable activities and hours:

The application is for the grant of a premises licence for the following activities:

Sale by Retail of Alcohol (Off the Premises):

Monday to Sunday from 0700hrs until 0000hrs

Hours the Premises is Open to the Public:

Monday to Sunday from 0700hrs until 0000hrs

5. Temporary Event Notices

In considering any application the Licensing Authority should be aware of the possible use of Temporary Event Notices to authorise licensable activities. A premises can extend the hours or scope of their operation by the use of Temporary Event Notices. Up to 15 events per year can be held under this provision at a particular premises. These events may last for up to 168 hours provided less than 500 people are accommodated and provided the total number of days used for these events does not exceed 21 per calendar year.

6. Date of receipt of application: 25 June 2026

7. Date of closure of period for representations: 23 July 2026

8. Representations received:

During the 28-day consultation period for the application, representations were

received from:

1. Ben Williams – Licensing Enforcement Officer for Reading Borough Council – attached as **MH002**.
2. Declan Smyth – Licensing Officer for Thames Valley Police – attached as **MH003**.
3. Alec Coomber – Environmental Health Graduate – attached as **MH004**.
4. Remya Ravindran – Trading Standards – attached as **MH005**.

9. Powers of the Authority in determining an application for the grant of a premises licence

The Licensing authority, when determining an application for the grant of a premises licence may:

- Grant the application as applied for
- Grant the application with modifications
- Refuse the application

10. Licensing Objectives and Reading Borough Council's Licensing Policy Statement

In considering representations received the Licensing Authority has a duty to carry out its functions with a view to promoting the four licensing objectives, which are as follows:

- The Prevention of Crime and Disorder
- Public Safety
- The Prevention of Public Nuisance
- The Protection of Children from Harm

Any conditions that are placed on a premises licence should be appropriate and proportionate with a view to promoting the licensing objectives. The Licensing Authority can amend, alter, or refuse an application should it be deemed appropriate for the promotion of the licensing objectives.

In determining this application, the Licensing Authority must also have regard to the representations received, the Licensing Authority's statement of licensing policy and any relevant section of the statutory guidance to licensing authorities.

11. The Council's Licensing Policy Statement (2023):

1.6 The predominantly urban nature of Reading as a town means that an appropriate balance needs to be struck between the needs of local business and the needs of local residents. This licensing policy seeks to encourage all stakeholders to engage in the licensing process so that the needs of all can be taken into account and issues dealt with in a spirit of partnership and cooperation.

3. Licensing and integration with other legislation

3.1 Many other pieces of legislation impact directly or indirectly on the licensing regime. The Licensing Authority must have regard to the following when it discharges its responsibilities under the Licensing Act 2003 and in relation to the promotion of the four

licensing objectives:

Crime and Disorder Act 1998

3.2 This Act requires local authorities and other bodies to consider crime and disorder reduction. Section 17 of the Act states that it shall be the duty of each authority, to exercise its various functions with due regard to the likely effect of the exercise of those functions on, and the need to do all that it reasonably can to prevent, crime and disorder in its area (including anti social and other behaviour) adversely affecting the local environment. This links specifically with the licensing objective of prevention of crime and disorder and the licensing authority will take into account all reasonable measures that actively promote this licensing objective.

5. Licensing Applications

Grant and Full Variations

5.6 During the 28-day consultation period, the authority will scrutinise the application along with all of the other Responsible Authorities to judge whether it undermines the promotion of the licensing objectives. The application will be made available to any person who requests to see it. As per Section 18 (6) of the Licensing Act 2003, it will consider the likely effect of granting any licence on the promotion of the licensing objectives. The authority will expect all applicants to have taken cognisance of the Secretary of State's Guidance; local strategies and initiatives; this policy and any other known local issues before submitting their application and that these matters are addressed within the operating schedule of the application.

5.7 Whilst many applications will be resolved without the need for a committee hearing, any matters or representations that are not resolved will trigger a hearing before the properly constituted Licensing Applications Committee for determination.

6. Licensing Conditions

General Approach

6.1 Conditions shall be appropriate and proportionate for the promotion of the licensing objectives and shall be unambiguous and clear in their stated aims. Conditions will also be tailored to the type, location and characteristics of the particular premises and the relevant licensable activities. Any condition imposed by the Authority shall also aim to avoid duplication of other legislation unless there is a requirement to impose such a condition in order to promote the licensing objectives (for example, a capacity limit for public safety reasons). This shall apply to all relevant applications (grant/variation of a premises licence or club premises certificate)

6.2 The operating schedule within an application should contain an assessment from the proposed licence holder of what they believe are appropriate and proportionate measures to enable them to carry out their proposed licensable activities. This assessment should be arrived at by taking cognisance of this policy and the Secretary of State's guidance which outlines the matters that an applicant should take into account such as issues in the locality and why their proposed measures are suitable for

their proposed operation.

6.5 Any conditions imposed upon a premises licence or club premises certificate will be tailored to that type of premises and the style of operation. Consideration will also be given to the locality of the premises; issues in the locality; the issues set out in the Guidance and any policy, initiative or other matter the licensing authority wishes to take into account in order to promote the four licensing objectives.

Off Licences and Conditions – General Approach

6.11 Shops selling alcohol for consumption off the premises can be the focus of antisocial behaviour, crime and disorder and public disturbance. In the town centre and Oxford Road area, for example, there are significant issues with street drinking and the associated anti-social behaviour this causes.

6.12 Any applications for off licences shall be considered in the light of all relevant matters that may undermine the licensing objectives such as street drinking in that locality as well as the availability of high strength beers, lagers and ciders and the detrimental effect those products have on health outcomes. This approach will apply to the whole Borough of Reading and the authority will seriously consider any representation made to it by Thames Valley Police, Public Health or other responsible authorities which indicate that the availability or sale of high strength beers, lagers and cider are likely to be detrimental to the promotion of the four licensing objectives.

6.13 When considering applications for off licences, the authority would expect applicants to acknowledge the above issues within their operating schedule.

7. Licensing Hours

General Approach

7.2 When an application receives representations, the authority may consider reducing the opening hours and times for licensable activities if it considers it appropriate for the promotion of the licensing objectives.

Licensed Premises in Residential Areas

7.6 When dealing with applications and issuing licences, the authority is likely to impose stricter conditions on premises operating in residential areas if it considers it appropriate and proportionate to do so. This will apply to all premises types.

7.7 Generally, any licensed premises looking to open past 11pm (2300hrs) in a residential area will need to demonstrate clearly in their operating schedule that public nuisance will not result from later operation. As part of the operating schedule, applicants should read the Secretary of State's Guidance, this policy and any other relevant document and ensure that robust measures are included in any application.

7.12 The licensing authority will seek the input of the Council's Environmental Protection and Nuisance team when looking at measures that may be appropriate for the prevention of public nuisance. This will include taking cognisance of any

representations that are submitted as part of the application process or any enforcement action they have taken under their own legislation – such as noise abatement notices.

8. Children in Licensed Premises

8.6 The Authority will expect all licence holders or premises that wish to allow children on to their premises to ensure that access is restricted where appropriate. This would include, ensuring that all children are accompanied and that they do not have access to or sight of alcohol.

10. Administration, Exercise and Delegation of Functions

10.1 The powers of the Licensing Authority under the Licensing Act 2003 may be carried out by the Licensing Committee; by a Sub Committee or by one or more officers acting under delegated authority. The Licensing Committee will consist of between 10-15 members and the committee may establish one or more sub-committees consisting of two or three members.

10.3 A Licensing Sub-Committee shall hear all applications where relevant representations have been received and applications for the review of a premises licence that may have been submitted by Responsible Authorities or any other persons.

12. Amended Guidance issued under section 182 of the Licensing Act 2003 (February 2026)

Licensing Objectives and Aims:

1.2 The legislation provides a clear focus on the promotion of four statutory objectives which must be addressed when licensing functions are undertaken.

1.3 The licensing objectives are:

- The Prevention of Crime and Disorder
- Public Safety
- The Prevention of Public Nuisance
- The Protection of Children from Harm

1.4 Each objective is of equal importance. There are no other statutory licensing objectives, so that the promotion of the four objectives is a paramount consideration at all times.

1.5 However, the legislation also supports a number of other key aims and purposes. These are vitally important and should be principal aims for everyone involved in licensing work. They include:

- protecting the public and local residents from crime, anti-social behaviour and noise nuisance caused by irresponsible licensed premises.

Steps to promote the licensing objectives:

8.41 In completing an operating schedule, applicants are expected to have regard to the statement of licensing policy for their area. They must also be aware of the expectations of the licensing authority and the responsible authorities as to the steps that are appropriate for the promotion of the licensing objectives, and to demonstrate knowledge of their local area when describing the steps they propose to take to promote the licensing objectives. Licensing authorities and responsible authorities are expected to publish information about what is meant by the promotion of the licensing objectives and to ensure that applicants can readily access advice about these matters. However, applicants are also expected to undertake their own enquiries about the area in which the premises are situated to inform the content of the application.

8.42 Applicants are, in particular, expected to obtain sufficient information to enable them to demonstrate, when setting out the steps they propose to take to promote the licensing objectives, that they understand:

- the layout of the local area and physical environment including crime and disorder hotspots, proximity to residential premises and proximity to areas where children may congregate;
- any risk posed to the local area by the applicants' proposed licensable activities; and
- any local initiatives (for example, local crime reduction initiatives or voluntary schemes including local taxi-marshalling schemes, street pastors and other schemes) which may help to mitigate potential risks.

8.43 Applicants are expected to include positive proposals in their application on how they will manage any potential risks. Where specific policies apply in the area (for example, a cumulative impact assessment), applicants are also expected to demonstrate an understanding of how the policy impacts on their application; any measures they will take to mitigate the impact; and why they consider the application should be an exception to the policy.

8.44 It is expected that enquiries about the locality will assist applicants when determining the steps that are appropriate for the promotion of the licensing objectives. For example, premises with close proximity to residential premises should consider what effect this will have on their smoking, noise management and dispersal policies to ensure the promotion of the public nuisance objective. Applicants must consider all factors which may be relevant to the promotion of the licensing objectives, and where there are no known concerns, acknowledge this in their application.

8.45 The majority of information which applicants will require should be available in the licensing policy statement in the area. Other publicly available sources which may be of use to applicants include:

- the Crime Mapping website;
- Neighbourhood Statistics website;
- websites or publications by local responsible authorities;
- websites or publications by local voluntary schemes and initiatives; and
- on-line mapping tools.

8.46 While applicants are not required to seek the views of responsible authorities before formally submitting their application, they may find them to be a useful source of expert advice on local issues that should be taken into consideration when making an application. Licensing authorities may wish to encourage co-operation between applicants, responsible authorities and, where relevant, local residents and businesses before applications are submitted in order to minimise the scope for disputes to arise.

8.47 Applicants are expected to provide licensing authorities with sufficient information in this section to determine the extent to which their proposed steps are appropriate to promote the licensing objectives in the local area. Applications must not be based on providing a set of standard conditions to promote the licensing objectives and applicants are expected to make it clear why the steps they are proposing are appropriate for the premises.

8.48 All parties are expected to work together in partnership to ensure that the licensing objectives are promoted collectively. Where there are no disputes, the steps that applicants propose to take to promote the licensing objectives, as set out in the operating schedule, will very often translate directly into conditions that will be attached to premises licences with the minimum of fuss.

8.49 For some premises, it is possible that no measures will be appropriate to promote one or more of the licensing objectives, for example, because they are adequately covered by other existing legislation. It is however important that all operating schedules should be precise and clear about the measures that are proposed to promote each of the licensing objectives.

The role of responsible authorities

9.12 Each responsible authority will be an expert in their respective field, and in some cases, it is likely that a particular responsible authority will be the licensing authority's main source of advice in relation to a particular licensing objective. For example, the police have a key role in managing the night-time economy and should have good working relationships with those operating in their local area⁵. The police should usually therefore be the licensing authority's main source of advice on matters relating to the promotion of the crime and disorder licensing objective. However, any responsible authority under the 2003 Act may make representations with regard to any of the licensing objectives if they have evidence to support such representations. Licensing authorities must therefore consider all relevant representations from responsible authorities carefully, even where the reason for a particular responsible authority's interest or expertise in the promotion of a particular objective may not be immediately apparent. However, it remains incumbent on all responsible authorities to ensure that their representations can withstand the scrutiny to which they would be subject at a hearing.

Hearings

9.38 In determining the application with a view to promoting the licensing objectives in the overall interests of the local community, the licensing authority must give appropriate weight to:

- the steps that are appropriate to promote the licensing objectives;
- the representations (including supporting information) presented by all the parties;
- this Guidance;
- its own statement of licensing policy.

9.39 The licensing authority should give its decision within five working days of the conclusion of the hearing (or immediately in certain specified cases) and provide reasons to support it. This will be important if there is an appeal by any of the parties. Notification of a decision must be accompanied by information on the right of the party to appeal. After considering all the relevant issues, the licensing authority may grant the application subject to such conditions that are consistent with the operating schedule. Any conditions imposed must be appropriate for the promotion of the licensing objectives; there is no power for the licensing authority to attach a condition that is merely aspirational. For example, conditions may not be attached which relate solely to the health of customers rather than their direct physical safety. Any conditions added to the licence must be those imposed at the hearing or those agreed when a hearing has not been necessary.

9.40 Alternatively, the licensing authority may refuse the application on the grounds that this is appropriate for the promotion of the licensing objectives. It may also refuse to specify a designated premises supervisor and/or only allow certain requested licensable activities. In the interests of transparency, the licensing authority should publish hearings procedures in full on its website to ensure that those involved have the most current information.

Determining actions that are appropriate for the promotion of the licensing objectives

9.42 Licensing authorities are best placed to determine what actions are appropriate for the promotion of the licensing objectives in their areas. All licensing determinations should be considered on a case-by-case basis. They should take into account any representations or objections that have been received from responsible authorities or other persons, and representations made by the applicant or premises user as the case may be.

9.43 The authority's determination should be evidence-based, justified as being appropriate for the promotion of the licensing objectives and proportionate to what it is intended to achieve.

13. The Licensing Act 2003

The Licensing Act 2003 under Section 18 (6) also states that any relevant representation should be considered in the context of:

(a) the likely effect of the grant of the premises licence on the promotion of the licensing objectives.

Therefore, in the context of the grant of a licence, it is reasonable for the Licensing Authority to base its decision on an application on what the likely effects of granting a licence would have on the promotion of the licensing objectives.

14. Relevant Case law for consideration:

(R) on the application of Hope and Glory Public House v Westminster City Council (2011) EWCA Civ31 illustrates that licensed premises, and the activities that take place in those premises, exist in a dynamic environment and should not be looked at entirely in isolation and confirms that this can include the impact that licensable activities have on a range of factors such as crime, the quality of life for residents and visitors to the area, and demand for licensed premises.

East Lindsey District Council v Abu Hanif (t/a Zara's Restaurant) (2016) this underpins the principles widely acknowledged within the Licensing Act 2003 that the licensing objectives are prospective, and that the prevention of crime and disorder requires a prospective consideration of what is warranted in the public interest, having regard to the twin considerations of prevention and deterrence.

15. Appendices

- MH001** – Premises Licence Application
- MH002** – Licensing Enforcement Representation
- MH003** – Thames Valley Police Representation
- MH004** – Environmental Health Representation
- MH005** – Trading Standards Representation



Reading
Application for a premises licence
Licensing Act 2003

For help contact
licensing@reading.gov.uk
Telephone: 0118 937 3762

* required information

Section 1 of 21

You can save the form at any time and resume it later. You do not need to be logged in when you resume.

System reference	Not Currently In Use	This is the unique reference for this application generated by the system.
Your reference		You can put what you want here to help you track applications if you make lots of them. It is passed to the authority.
Are you an agent acting on behalf of the applicant?		Put "no" if you are applying on your own behalf or on behalf of a business you own or work for.
☒ Yes ☐ No		

Applicant Details

* First name	Kulwant Singh	
* Family name	Gaba	
* E-mail		
Main telephone number		Include country code.
Other telephone number		
☒ Indicate here if the applicant would prefer not to be contacted by telephone		

Is the applicant:

- ☐ Applying as a business or organisation, including as a sole trader
- ☒ Applying as an individual

A sole trader is a business owned by one person without any special legal structure. Applying as an individual means the applicant is applying so the applicant can be employed, or for some other personal reason, such as following a hobby.

Continued from previous page...

Address

* Building number or name	
* Street	
District	
* City or town	Hayes
County or administrative area	
* Postcode	
* Country	United Kingdom

Agent Details

* First name	Manpreet Singh
* Family name	Kapoor
* E-mail	
Main telephone number	
Other telephone number	

Include country code.

☐ Indicate here if you would prefer not to be contacted by telephone

Are you:

- ☒ An agent that is a business or organisation, including a sole trader
- ☐ A private individual acting as an agent

A sole trader is a business owned by one person without any special legal structure.

Agent Business

Is your business registered in the UK with Companies House? ☒ Yes ☐ No

Note: completing the Applicant Business section is optional in this form.

Registration number	10291684
Business name	Personal Licence Courses UK Ltd
VAT number	-
Legal status	Private Limited Company
Your position in the business	Employee
Home country	United Kingdom

If your business is registered, use its registered name.

Put "none" if you are not registered for VAT.

The country where the headquarters of your business is located.

Continued from previous page...

Agent Registered Address

Address registered with Companies House.

Building number or name	
Street	
District	
City or town	West Drayton
County or administrative area	
Postcode	
Country	United Kingdom

Section 2 of 21

PREMISES DETAILS

I/we, as named in section 1, apply for a premises licence under section 17 of the Licensing Act 2003 for the premises described in section 2 below (the premises) and I/we are making this application to you as the relevant licensing authority in accordance with section 12 of the Licensing Act 2003.

Premises Address

Are you able to provide a postal address, OS map reference or description of the premises?

☒ Address ☐ OS map reference ☐ Description

Postal Address Of Premises

Building number or name	M & M Food & Wine
Street	55-57 Wokingham Road
District	Caversham
City or town	Reading
County or administrative area	
Postcode	RG6 1LH
Country	United Kingdom

Further Details

Telephone number	
Non-domestic rateable value of premises (£)	24,500

Section 3 of 21

APPLICATION DETAILS

In what capacity are you applying for the premises licence?

- ☒ An individual or individuals
- ☐ A limited company / limited liability partnership
- ☐ A partnership (other than limited liability)
- ☐ An unincorporated association
- ☐ Other (for example a statutory corporation)
- ☐ A recognised club
- ☐ A charity
- ☐ The proprietor of an educational establishment
- ☐ A health service body
- ☐ A person who is registered under part 2 of the Care Standards Act 2000 (c14) in respect of an independent hospital in Wales
- ☐ A person who is registered under Chapter 2 of Part 1 of the Health and Social Care Act 2008 in respect of the carrying on of a regulated activity (within the meaning of that Part) in an independent hospital in England
- ☐ The chief officer of police of a police force in England and Wales

Confirm The Following

- ☒ I am carrying on or proposing to carry on a business which involves the use of the premises for licensable activities
- ☐ I am making the application pursuant to a statutory function
- ☐ I am making the application pursuant to a function discharged by virtue of Her Majesty's prerogative

Section 4 of 21

INDIVIDUAL APPLICANT DETAILS

Applicant Name

Is the name the same as (or similar to) the details given in section one?

- ☒ Yes ☐ No

If "Yes" is selected you can re-use the details from section one, or amend them as required. Select "No" to enter a completely new set of details.

First name

Kulwant Singh

Family name

Gaba

Is the applicant 18 years of age or older?

- ☒ Yes ☐ No

Continued from previous page...

Current Residential Address

Is the address the same as (or similar to) the address given in section one?

☒ Yes ☐ No

If "Yes" is selected you can re-use the details from section one, or amend them as required. Select "No" to enter a completely new set of details.

Building number or name	
Street	
District	
City or town	Hayes
County or administrative area	
Postcode	
Country	United Kingdom

Applicant Contact Details

Are the contact details the same as (or similar to) those given in section one?

☒ Yes ☐ No

If "Yes" is selected you can re-use the details from section one, or amend them as required. Select "No" to enter a completely new set of details.

E-mail	
Telephone number	
Other telephone number	
* Date of birth	ddmmyyyy
* Nationality	British
Right to work share code	

Documents that demonstrate entitlement to work in the UK
Right to work share code if not submitting scanned documents

Add another applicant

Section 5 of 21

OPERATING SCHEDULE

When do you want the premises licence to start?	/ / ddmmyyyy
If you wish the licence to be valid only for a limited period, when do you want it to end	/ / ddmmyyyy

Provide a general description of the premises

Continued from previous page...

For example the type of premises, its general situation and layout and any other information which could be relevant to the licensing objectives. Where your application includes off-supplies of alcohol and you intend to provide a place for consumption of these off- supplies you must include a description of where the place will be and its proximity to the premises.

Off Licence and Convenience Store

If 5,000 or more people are expected to attend the premises at any one time, state the number expected to attend

Section 6 of 21

PROVISION OF PLAYS

[See guidance on regulated entertainment](#)

Will you be providing plays?

☐ Yes ☒ No

Section 7 of 21

PROVISION OF FILMS

[See guidance on regulated entertainment](#)

Will you be providing films?

☐ Yes ☒ No

Section 8 of 21

PROVISION OF INDOOR SPORTING EVENTS

[See guidance on regulated entertainment](#)

Will you be providing indoor sporting events?

☐ Yes ☒ No

Section 9 of 21

PROVISION OF BOXING OR WRESTLING ENTERTAINMENTS

[See guidance on regulated entertainment](#)

Will you be providing boxing or wrestling entertainments?

☐ Yes ☒ No

Section 10 of 21

PROVISION OF LIVE MUSIC

[See guidance on regulated entertainment](#)

Will you be providing live music?

☐ Yes ☒ No

Section 11 of 21

PROVISION OF RECORDED MUSIC

[See guidance on regulated entertainment](#)

Continued from previous page...

Will you be providing recorded music?

☐ Yes ☒ No

Section 12 of 21

PROVISION OF PERFORMANCES OF DANCE

[See guidance on regulated entertainment](#)

Will you be providing performances of dance?

☐ Yes ☒ No

Section 13 of 21

PROVISION OF ANYTHING OF A SIMILAR DESCRIPTION TO LIVE MUSIC, RECORDED MUSIC OR PERFORMANCES OF DANCE

[See guidance on regulated entertainment](#)

Will you be providing anything similar to live music, recorded music or performances of dance?

☐ Yes ☒ No

Section 14 of 21

LATE NIGHT REFRESHMENT

Will you be providing late night refreshment?

☐ Yes ☒ No

Section 15 of 21

SUPPLY OF ALCOHOL

Will you be selling or supplying alcohol?

☒ Yes ☐ No

Standard Days And Timings

MONDAY

Start

End

Start

End

Give timings in 24 hour clock.
(e.g., 16:00) and only give details for the days
of the week when you intend the premises
to be used for the activity.

TUESDAY

Start

End

Start

End

WEDNESDAY

Start

End

Start

End

THURSDAY

Start

End

Start

End



Continued from previous page...

Enter the contact's address

Building number or name	
Street	
District	
City or town	
County or administrative area	
Postcode	
Country	United Kingdom
Personal Licence number (if known)	LBHIL1773
Issuing licensing authority (if known)	London Borough of Hillingdon

PROPOSED DESIGNATED PREMISES SUPERVISOR CONSENT

How will the consent form of the proposed designated premises supervisor be supplied to the authority?

- ☐ Electronically, by the proposed designated premises supervisor
- ☒ As an attachment to this application

Reference number for consent form (if known)

If the consent form is already submitted, ask the proposed designated premises supervisor for its 'system reference' or 'your reference'.

Section 16 of 21

ADULT ENTERTAINMENT

Highlight any adult entertainment or services, activities, or other entertainment or matters ancillary to the use of the premises that may give rise to concern in respect of children

Give information about anything intended to occur at the premises or ancillary to the use of the premises which may give rise to concern in respect of children, regardless of whether you intend children to have access to the premises, for example (but not exclusively) nudity or semi-nudity, films for restricted age groups etc gambling machines etc.

NONE

Section 17 of 21

HOURS PREMISES ARE OPEN TO THE PUBLIC

Standard Days And Timings

MONDAY

Start

End

Start

End

Give timings in 24 hour clock.
(e.g., 16:00) and only give details for the days
of the week when you intend the premises
to be used for the activity.

Continued from previous page...

TUESDAY

Start	07:00	End	00:00
Start		End	

WEDNESDAY

Start	07:00	End	00:00
Start		End	

THURSDAY

Start	07:00	End	00:00
Start		End	

FRIDAY

Start	07:00	End	00:00
Start		End	

SATURDAY

Start	07:00	End	00:00
Start		End	

SUNDAY

Start	07:00	End	00:00
Start		End	

State any seasonal variations

For example (but not exclusively) where the activity will occur on additional days during the summer months.

NONE

Non standard timings. Where you intend to use the premises to be open to the members and guests at different times from those listed in the column on the left, list below

For example (but not exclusively), where you wish the activity to go on longer on a particular day e.g. Christmas Eve.

NONE

Section 18 of 21

LICENSING OBJECTIVES

Describe the steps you intend to take to promote the four licensing objectives:

a) General – all four licensing objectives (b,c,d,e)

Continued from previous page...

List here steps you will take to promote all four licensing objectives together.

1. Strict implementation of challenge 25 policy
2. CCTV to be installed and 28 days recoding system
3. All staff to be trained in responsible alcohol retailing

b) The prevention of crime and disorder

1. CCTV shall be installed to Home Office Guidance standards and maintained in a good working condition and recordings shall be kept for 31 days and shall be made available to police and authorised Officers from the council.
2. The CCTV system shall be capable of obtaining clear facial recognition images and a clear head and shoulders image of every person entering or leaving the premises.
3. The CCTV system shall display on any recordings, the correct date and time of the recording.
4. A member of staff trained in the use of the CCTV system shall be available at the premise at all times that the premises are open to the public.
5. A CCTV camera shall be installed to cover the entrance of the premises and further cameras installed to cover the internal area and servery counter.
6. A suitable intruder alarm complete with panic button shall be fitted and maintained.
7. An incident log shall be kept at the premises, and made available for Inspection 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
 - (d) any incidents of disorder
 - (e) all seizures of drugs or offensive weapons
 - (f) any faults in the CCTV system
 - (g) any refusal of the sale of alcohol
 - (h) any visit by a relevant authority or emergency service.
8. Staff training must be documented and based on legislation and operating procedures. All training shall be signed and dated, and a copy of such records will be available for inspection by Police and local authority enforcement officers.
9. All staff employed at the premises will have UK right to work status checked, once passed that stage they shall be offered employment.
- 10 Spirits (with the exception of spirit mixers and pre-mixed spirit drinks) shall be located behind the counter.
11. A current written authorisation list shall be displayed in a prominent position on the premises confirming the details of all current staff that have been authorised to sell alcohol by a Personal Licence Holder. The authorisation list shall include, the name of the staff member authorised, the name and personal licence details of the person authorising them to sell alcohol. This list shall also contain the date and signature of the staff member authorised and countersigned by the authorising Personal Licence Holder.
12. A section 57 notice shall be displayed in a prominent position detailing the location of the Part A of the premises licence, and a list of staff members that have an awareness of its location and content.
13. The premises licence holder shall not sell super strength beer, lager or cider with an alcohol content of 6.5% ABV (alcohol by volume) or greater. This restriction shall not apply in respect of specialist branded, premium priced products – for example craft ales, local or microbrewery specialist products, boxed gifts or national celebratory/commemorative beer,

Continued from previous page...

lager or cider with an alcohol content of 6.5% ABV or greater.

14. Invoices for all alcohol, tobacco and vape products to be made available immediately when requested by council officers or Police Officers.

c) Public safety

1. Installation of appropriate safety equipment

2. Fire exit signs displayed

3. CCTV working at all times

d) The prevention of public nuisance

1. Clearly legible and suitable notices shall be displayed at all exits requesting customers to respect the needs of local residents and businesses to leave the premises and area quietly.

2. Staff shall actively discourage and disperse all persons who congregate outside the premises so as to minimise disturbance to local residents and businesses. Any incidents shall be recorded in the incident register.

3. The premises and area immediately outside the premises shall be kept clear of all forms of litter whilst the premises is open for licensable activities.

e) The protection of children from harm

1. A challenge 25 policy will be in force, where any person looking under the age of 25 shall be asked to prove their age when attempting to purchase alcohol and signs to this effect will be displayed at the premises. Challenge 25 posters displayed where alcohol is sold.

2. The only acceptable ID will be those with photographic identification documents, including passport, photo-card, driving license or proof of age card bearing the PASS hologram.

3. An refusal book shall be kept at the premises and updated as and when required, and made available for inspection on request to an Licensing Officer, Police or other responsible authority.

4. A sign stating "No proof of age – No sale" shall be displayed at the point of sale.

Section 19 of 21

NOTES ON DEMONSTRATING ENTITLEMENT TO WORK IN THE UK

Continued from previous page...

Entitlement to work/immigration status for individual applicants and applications from partnerships which are not limited liability partnerships:

A licence may not be held by an individual or an individual in a partnership who is resident in the UK who:

- does not have the right to live and work in the UK; or
- is subject to a condition preventing him or her from doing work relating to the carrying on of a licensable activity.

Any premises licence issued in respect of an application made on or after 6 April 2017 will become invalid if the holder ceases to be entitled to work in the UK.

Applicants must demonstrate that they have an entitlement to work in the UK and are not subject to a condition preventing them from doing work relating to the carrying on of a licensable activity. They do this in one of two ways: 1) by providing with this application copies or scanned copies of the documents listed below (which do not need to be certified), or 2) by providing their 'share code' to enable the licensing authority to carry out a check using the Home Office online right to work checking service (see below).

Documents which demonstrate entitlement to work in the UK

- An expired or current passport showing the holder, or a person named in the passport as the child of the holder, is a British citizen or a citizen of the UK and Colonies having the right of abode in the UK [please see note below about which sections of the passport to copy].
- An expired or current passport or national identity card showing the holder, or a person named in the passport as the child of the holder, is a national of a European Economic Area country or Switzerland.
- A Registration Certificate or document certifying permanent residence issued by the Home Office to a national of a European Economic Area country or Switzerland.
- A Permanent Residence Card issued by the Home Office to the family member of a national of a European Economic Area country or Switzerland.
- A **current** Biometric Immigration Document (Biometric Residence Permit) issued by the Home Office to the holder indicating that the person named is allowed to stay indefinitely in the UK, or has no time limit on their stay in the UK.
- A **current** passport endorsed to show that the holder is exempt from immigration control, is allowed to stay indefinitely in the UK, has the right of abode in the UK, or has no time limit on their stay in the UK.
- A **current** Immigration Status Document issued by the Home Office to the holder with an endorsement indicating that the named person is allowed to stay indefinitely in the UK or has no time limit on their stay in the UK, **when produced in combination with** an official document giving the person's permanent National Insurance number and their name issued by a Government agency or a previous employer.
- A birth or adoption certificate issued in the UK, **when produced in combination with** an official document giving the person's permanent National Insurance number and their name issued by a Government agency or a previous employer.
- A birth or adoption certificate issued in the Channel Islands, the Isle of Man or Ireland **when produced in combination with** an official document giving the person's permanent National Insurance number and their name issued by a Government agency or a previous employer.
- A certificate of registration or naturalisation as a British citizen, **when produced in combination with** an official document giving the person's permanent National Insurance number and their name issued by a Government agency or a previous employer.

Continued from previous page...

- A **current** passport endorsed to show that the holder is allowed to stay in the UK and is currently allowed to work and is not subject to a condition preventing the holder from doing work relating to the carrying on of a licensable activity.
- A **current** Biometric Immigration Document (Biometric Residence Permit) issued by the Home Office to the holder which indicates that the named person can currently stay in the UK and is allowed to work relation to the carrying on of a licensable activity.
- A **current** Residence Card issued by the Home Office to a person who is not a national of a European Economic Area state or Switzerland but who is a family member of such a national or who has derivative rights or residence.
- A **current** Immigration Status Document containing a photograph issued by the Home Office to the holder with an endorsement indicating that the named person may stay in the UK, and is allowed to work and is not subject to a condition preventing the holder from doing work relating to the carrying on of a licensable activity **when produced in combination with** an official document giving the person's permanent National Insurance number and their name issued by a Government agency or a previous employer.
- A Certificate of Application, **less than 6 months old**, issued by the Home Office under regulation 18(3) or 20(2) of the Immigration (European Economic Area) Regulations 2016, to a person who is not a national of a European Economic Area state or Switzerland but who is a family member of such a national or who has derivative rights of residence.
- Reasonable evidence that the person has an outstanding application to vary their permission to be in the UK with the Home Office such as the Home Office acknowledgement letter or proof of postage evidence, or reasonable evidence that the person has an appeal or administrative review pending on an immigration decision, such as an appeal or administrative review reference number.
- Reasonable evidence that a person who is not a national of a European Economic Area state or Switzerland but who is a family member of such a national or who has derivative rights of residence in exercising treaty rights in the UK including:-
 - evidence of the applicant's own identity – such as a passport,
 - evidence of their relationship with the European Economic Area family member – e.g. a marriage certificate, civil partnership certificate or birth certificate, and
 - evidence that the European Economic Area national has a right of permanent residence in the UK or is one of the following if they have been in the UK for more than 3 months:
 - (i) working e.g. employment contract, wage slips, letter from the employer,
 - (ii) self-employed e.g. contracts, invoices, or audited accounts with a bank,
 - (iii) studying e.g. letter from the school, college or university and evidence of sufficient funds; or
 - (iv) self-sufficient e.g. bank statements.

Family members of European Economic Area nationals who are studying or financially independent must also provide evidence that the European Economic Area national and any family members hold comprehensive sickness insurance in the UK. This can include a private medical insurance policy, an EHIC card or an S1, S2 or S3 form.

Original documents must not be sent to licensing authorities. If the document copied is a passport, a copy of the following pages should be provided:-

- (i) any page containing the holder's personal details including nationality;
- (ii) any page containing the holder's photograph;
- (iii) any page containing the holder's signature;
- (iv) any page containing the date of expiry; and
- (v) any page containing information indicating the holder has permission to enter or remain in the UK and is permitted to work.

Continued from previous page...

If the document is not a passport, a copy of the whole document should be provided.

Your right to work will be checked as part of your licensing application and this could involve us checking your immigration status with the Home Office. We may otherwise share information with the Home Office. Your licence application will not be determined until you have complied with this guidance.

Home Office online right to work checking service

As an alternative to providing a copy of the documents listed above, applicants may demonstrate their right to work by allowing the licensing authority to carry out a check with the Home Office online right to work checking service.

To demonstrate their right to work via the Home Office online right to work checking service, applicants should include in this application their 9-digit share code (provided to them upon accessing the service at <https://www.gov.uk/prove-right-to-work>) which, along with the applicant's date of birth (provided within this application), will allow the licensing authority to carry out the check.

In order to establish the applicant's right to work, the check will need to indicate that the applicant is allowed to work in the United Kingdom and is not subject to a condition preventing them from doing work relating to the carrying on of a licensable activity.

An online check will not be possible in all circumstances because not all applicants will have an immigration status that can be checked online. The Home Office online right to work checking service sets out what information and/or documentation applicants will need in order to access the service. Applicants who are unable to obtain a share code from the service should submit copy documents as set out above.

Section 20 of 21

NOTES ON REGULATED ENTERTAINMENT

Continued from previous page...

In terms of specific **regulated entertainments** please note that:

- Plays: no licence is required for performances between 08:00 and 23.00 on any day, provided that the audience does not exceed 500.
- Films: no licence is required for 'not-for-profit' film exhibition held in community premises between 08.00 and 23.00 on any day provided that the audience does not exceed 500 and the organiser (a) gets consent to the screening from a person who is responsible for the premises; and (b) ensures that each such screening abides by age classification ratings.
- Indoor sporting events: no licence is required for performances between 08.00 and 23.00 on any day, provided that the audience does not exceed 1000.
- Boxing or Wrestling Entertainment: no licence is required for a contest, exhibition or display of Greco-Roman wrestling, or freestyle wrestling between 08.00 and 23.00 on any day, provided that the audience does not exceed 1000. Combined fighting sports – defined as a contest, exhibition or display which combines boxing or wrestling with one or more martial arts – are licensable as a boxing or wrestling entertainment rather than an indoor sporting event.
- Live music: no licence permission is required for:
 - o a performance of unamplified live music between 08.00 and 23.00 on any day, on any premises.
 - o a performance of amplified live music between 08.00 and 23.00 on any day on premises authorised to sell alcohol for consumption on those premises, provided that the audience does not exceed 500.
 - o a performance of amplified live music between 08.00 and 23.00 on any day, in a workplace that is not licensed to sell alcohol on those premises, provided that the audience does not exceed 500.
 - o a performance of amplified live music between 08.00 and 23.00 on any day, in a church hall, village hall, community hall, or other similar community premises, that is not licensed by a premises licence to sell alcohol, provided that (a) the audience does not exceed 500, and (b) the organiser gets consent for the performance from a person who is responsible for the premises.
 - o a performance of amplified live music between 08.00 and 23.00 on any day, at the non-residential premises of (i) a local authority, or (ii) a school, or (iii) a hospital, provided that (a) the audience does not exceed 500, and (b) the organiser gets consent for the performance on the relevant premises from: (i) the local authority concerned, or (ii) the school or (iii) the health care provider for the hospital.
- Recorded Music: no licence permission is required for:
 - o any playing of recorded music between 08.00 and 23.00 on any day on premises authorised to sell alcohol for consumption on those premises, provided that the audience does not exceed 500.
 - o any playing of recorded music between 08.00 and 23.00 on any day, in a church hall, village hall, community hall, or other similar community premises, that is not licensed by a premises licence to sell alcohol, provided that (a) the audience does not exceed 500, and (b) the organiser gets consent for the performance from a person who is responsible for the premises.
 - o any playing of recorded music between 08.00 and 23.00 on any day, at the non-residential premises of (i) a local authority, or (ii) a school, or (iii) a hospital, provided that (a) the audience does not exceed 500, and (b) the organiser gets consent for the performance on the relevant premises from: (i) the local authority concerned, or (ii) the school proprietor or (iii) the health care provider for the hospital.

Continued from previous page...

- Dance: no licence is required for performances between 08.00 and 23.00 on any day, provided that the audience does not exceed 500. However, a performance which amounts to adult entertainment remains licensable.
- Cross activity exemptions: no licence is required between 08.00 and 23.00 on any day, with no limit on audience size for:
 - o any entertainment taking place on the premises of the local authority where the entertainment is provided by or on behalf of the local authority;
 - o any entertainment taking place on the hospital premises of the health care provider where the entertainment is provided by or on behalf of the health care provider;
 - o any entertainment taking place on the premises of the school where the entertainment is provided by or on behalf of the school proprietor; and
 - o any entertainment (excluding films and a boxing or wrestling entertainment) taking place at a travelling circus, provided that (a) it takes place within a moveable structure that accommodates the audience, and (b) that the travelling circus has not been located on the same site for more than 28 consecutive days.

Section 21 of 21

PAYMENT DETAILS

This fee must be paid to the authority. If you complete the application online, you must pay it by debit or credit card.

The fee payable will be based on the rateable value of the property. Band A - 0 - 4300 - Fee Payable - 100 Band B - 4301 - 33,000 - Fee Payable - 190 Band C - 33,001 - 87,000 - Fee Payable - 315 Band D - 87,001 - 125,000 - Fee payable - 450 Band E - 125,001 and over - Fee payable - 635 Additional fees apply to outdoor events.

* Fee amount (£)

DECLARATION

Applicable to individual applicants only, including those in a partnership which is not a limited liability partnership] I understand I am not entitled to be issued with a licence if I do not have the entitlement to live and work in the UK (or if I am subject to a condition preventing me from doing work relating to the carrying on of a licensable activity) and that my licence will become invalid if I cease to be entitled to live and work in the UK (please read guidance note 15

The DPS named in this application form is entitled to work in the UK (and is not subject to conditions preventing him or her from doing work relating to a licensable activity) and I have seen a copy of his or her proof of entitlement to work, if appropriate (please see note 15)

☒ Ticking this box indicates you have read and understood the above declaration

This section should be completed by the applicant, unless you answered "Yes" to the question "Are you an agent acting on behalf of the applicant?"

* Full name

* Capacity

* Date / /
dd mm yyyy

[Add another signatory](#)

Once you're finished you need to do the following:

1. Save this form to your computer by clicking file/save as...
2. Go back to <https://www.gov.uk/apply-for-a-licence/premises-licence/reading/apply-1> to upload this file and continue with your application.

Don't forget to make sure you have all your supporting documentation to hand.

Continued from previous page...

IT IS AN OFFENCE LIABLE TO SUMMARY CONVICTION TO A FINE OF ANY AMOUNT UNDER SECTION 158 OF THE LICENSING ACT 2003, TO MAKE A FALSE STATEMENT IN OR IN CONNECTION WITH THIS APPLICATION

IT IS AN OFFENCE UNDER SECTION 24B OF THE IMMIGRATION ACT 1971 FOR A PERSON TO WORK WHEN THEY KNOW, OR HAVE REASONABLE CAUSE TO BELIEVE, THAT THEY ARE DISQUALIFIED FROM DOING SO BY REASON OF THEIR IMMIGRATION STATUS. THOSE WHO EMPLOY AN ADULT WITHOUT LEAVE OR WHO IS SUBJECT TO CONDITIONS AS TO EMPLOYMENT WILL BE LIABLE TO A CIVIL PENALTY UNDER SECTION 15 OF THE IMMIGRATION, ASYLUM AND NATIONALITY ACT 2006 AND PURSUANT TO SECTION 21 OF THE SAME ACT, WILL BE COMMITTING AN OFFENCE WHERE THEY DO SO IN THE KNOWLEDGE, OR WITH REASONABLE CAUSE TO BELIEVE, THAT THE EMPLOYEE IS DISQUALIFIED

OFFICE USE ONLY

Applicant reference number	
Fee paid	
Payment provider reference	
ELMS Payment Reference	
Payment status	
Payment authorisation code	
Payment authorisation date	
Date and time submitted	
Approval deadline	
Error message	
Is Digitally signed	☐

Name of Officer	Ben Williams						
Type of Application	Premises Licence - Grant – Licensing Act 2003						
Name of Premises	M & M Food & Wine						
Address	55-57 Wokingham Road Reading RG6 1LH						
Licensable Activities	Sale by Retail of Alcohol (Off Sales)						
Proposed Hours							
Open Time	Mon	Tue	Wed	Thu	Fri	Sat	Sun
	07:00	07:00	07:00	07:00	07:00	07:00	07:00
Finish Time	Mon	Tue	Wed	Thu	Fri	Sat	Sun
	00:00	00:00	00:00	00:00	00:00	00:00	00:00
Content of Application:							
The application was submitted by Personal Licence Courses UK Ltd (agent), on behalf the applicant, Kulwant Singh Gaba. The application seeks the grant of a premises licence pursuant to the Licensing Act 2003 for the sale of alcohol by retail (off sales). The proposed opening hours are: Monday to Sunday from 0700hrs to 0000hrs							
Licensing Officer's Comments:							
The approach of the Licensing Team:							
The Responsible Authorities named in the Licensing Act 2003 have to ensure that the licensing objectives are all actively promoted to prevent crime and disorder, prevent public nuisance, to protect children from harm and to ensure public safety. All four licensing objectives are of equal importance. Section 18 (6) of the Licensing Act 2003 makes clear that representations should be about the likely effect of granting a licence on the promotion of the licensing objectives. The case law of East Lindsey DC v Abu Hanif also clearly outlines that the licensing objectives require a prospective consideration of what is warranted in the public interest having regard to the twin interests of prevention and deterrence. In other words, responsible authorities do not have to wait for the licensing objectives to be undermined before considering taking action to prevent and deter that action from occurring in the first place.							

The Licensing team wish to make representation in relation to the above application submitted on behalf of Kulwant Singh Gaba in relation to the premises at 55-57 Wokingham Road, Reading.

The proposed Licensee Kulwant Singh Gaba, is also nominated as the DPS for the premises within the application.

Mr Gaba has a number of convictions relating to regulatory offences including offences under:

- Food safety Act 1990
- Consumer Protection from unfair trading regs 2008
- Consumer Protection Act 1987
- Powers of Criminal Courts (Sentencing) Act 2000
- Tobacco and related products regulations 2016
- Tobacco products (manufacture presentation and sale) (Safety) Regs 2002

Separate to the history of Mr Gaba the Licensing Team are also concerned with the history of the premises. There was previously a licence in force at the premises for the sale of alcohol for off sales, this was surrendered on 17th June 2026 following a visit on the same day by Licensing Officers and Officers from the Home Office Immigration Team.

During that visit checks were carried out on 3 Males within the premises, One of the males was discovered to be a Nepalese, Failed Asylum Seeker who had no Leave to Remain in the UK. He also had no Right to Work.

The male told officers that he worked Monday to Friday and sometimes Saturdays from 09:00 until 16:00 meaning he would work between 35 to 42 hours a week, the male sated he was mainly paid in food, Namely Rice and Beans but later mentioned he was given £10-£15 per day.

The male also stated he had been working at the premises for about a month, but documents discovered in the store showed he had been working there since at least 16th April 2026. The male stated he had been hired by the manager at the time Manmeet Singh who he had informed that he had no right to work and was managed by him and another man by the name of Muhammad.

Following the visit Licensing Officers contacted the Licensee who stated they had sold the business 2 years ago to Mr Manmeet Singh and had believed that the licence had been transferred at that time. The Licensee surrendered the licence that same day.

Following receipt of the application on 25th June 2026 , enquiries were made with the applicant's agent on 1st July 2026 regarding whether Mr Singh had any involvement in the proposed business. The Licensing Authority was informed

that he did not. Evidence to support that assertion was requested but, as of the date of this representation, no such evidence has been provided.

On 16th July 2026, Licensing Officers attended the premises and observed Mr Singh working behind the counter. During that visit, Mr Singh stated that Mr Gaba is his cousin and that they were running the premises together. When asked if this arrangement would continue going forward, Mr Singh confirmed that it would.

The Licensing Authority considers this information to be inconsistent with the information previously supplied on behalf of the applicant. This inconsistency raises concerns regarding the transparency of the proposed management arrangements and impacts upon the Authority's confidence in the manner in which the premises would be operated should a licence be granted.

These concerns are heightened by the circumstances identified at the premises on 17th June 2026 involving an individual with no right to work in the UK.

Mr Singhs alleged actions are deeply concerning and bring himself and the premises into disrepute. Mr Singh having management responsibility at the premises add an extra layer of concerns around the promotion of the licensing objectives.

Having viewed and considered the operating schedule Licensing are also unsatisfied with the proposed conditions for the premises and do not believe that should a licence be granted that they would be enough to promote the licensing objectives.

Prevention of Crime and Disorder – Mr Gaba and has proven himself to have no issues breaking the law and the Licensing Team are concerned he would continue to do so if granted the licence. The Licensing Team are further concerned that, given the history of the premises, when combined with Mr Gaba's long list of convictions, and the previous discovery of an illegal worker at the premises, a significant risk to the licensing objectives would be created by the granting of a licence.

Reading Borough Council – Statement of Licensing Policy 2023

Immigration Act 2016

3.4 Section 36 and Schedule 4 of the Immigration Act 2016 amended the Licensing Act 2003 and made Home Office Immigration Enforcement a Responsible Authority concerned with the licensing objective of prevention of crime and disorder. They will exercise their power both in respect of being a consultee on new licence applications and having right of entry to licensed premises with a view to seeing whether an offence under any of the

Immigration Acts is being committed on a licensed premises. This will primarily involve the detection and prevention of illegal working on premises that have an alcohol licence or a late night refreshment licence. The offence of employing people at a licensed premises who have no right to work in the UK is also now listed in the Secretary of State's guidance under Section 11.27 which covers criminal activity deemed to be particularly serious and where a licensing authority should consider revoking a premises licence even in the first instance. This Act clearly supports and actively promotes the licensing objective of preventing crime and disorder and the licensing authority will work with colleagues in the Immigration service and Thames Valley Police to enforce this.

Designated Premises Supervisors

5.21 Where an objection is received by the Authority from Thames Valley Police in respect of the proposed DPS, the authority is required to hold a hearing before the Licensing Applications Committee within the timescales set out in the Act and accompanying regulations.

Applications and the Immigration Act 2016

5.47 Immigration offences such as the employment of illegal workers are now listed as one of the most serious criminal offences in the guidance to the Licensing Act 2003. The payment of Immigration penalties are also now a relevant offence under the Licensing Act 2003.

5.48 The Licensing Authority consider the prevention of crime and disorder licensing objective in relation to the prevention of illegal working in licensed premises to be of particular seriousness and will expect applicants to address these issues within any application submitted to us.

Off Licences and Conditions – General Approach

6.11 Shops selling alcohol for consumption off the premises can be the focus of anti-social behaviour, crime and disorder and public nuisance. In the town centre and Oxford Road area, for example, there are significant issues with street drinking and the associated anti-social behaviour this causes.

6.12 Any applications for off licences shall be considered in the light of all relevant matters that may undermine the licensing objectives such as street drinking in that locality as well as the availability of high strength beers, lagers and ciders and the detrimental effect those products have on health outcomes. This approach will apply to the whole Borough of Reading and the authority will seriously consider any representation made to it by Thames Valley Police, Public Health or other responsible authorities which indicate that the availability or sale of high strength beers, lagers and cider are likely to be detrimental to the promotion of the four licensing objectives.

6.13 When considering applications for off licences, the authority would expect applicants to acknowledge the above issues within their operating schedule.

6.17 The sale of alcohol to underage people is an offence under the Licensing Act and can severely undermine the prevention of crime and disorder and the protection of children from harm licensing objectives. The excessive consumption of alcohol by young people is also likely to impact negatively on health outcomes. Applicants for off licences will be expected to include robust measures to ensure that alcohol is sold responsibly and that any staff are trained to a high level to achieve this. Evidence of best practice in terms of recording refusals of age restricted products will be expected within all applications.

Enforcement -general principles

9.1 It is the responsibility under the Act for all responsible authorities; licence holders and prospective licence holders to actively promote the four licensing objectives. The Council along with partner agencies, has a wider responsibility to protect the public as a whole and prevent crime, harm or nuisance from taking place.

9.2 The Authority will carry out its licensing functions with a view to actively promoting the licensing objectives and maintaining public safety. This applies to the dual role the licensing authority has both as the administrator of the process and as a responsible authority.

9.3 The Licensing Authority has previously and will continue to work with other responsible authorities and partner agencies in order to ensure that the licensing objectives are promoted and that a consistent and joined up approach is taken to enforcement across Reading.

9.4 Reading Borough Council and Thames Valley Police work in partnership when carrying out work that involves licensed premises and any matter that undermines the licensing objectives. The Authority and Thames Valley Police also work in partnership with colleagues in the Home Office Immigration Enforcement team and Trading Standards on a variety of issues including the prevention and detection of illegal working in licensed premises and issues surrounding super strength alcoholic products and responsible alcohol retailing.

Enforcement Approach

9.14 Licence holders should be aware that some criminal activity on licensed premises is considered to be of such seriousness to warrant a licence being reviewed straight away. There is certain criminal activity stated within the Secretary of State's Guidance that should be taken particularly seriously and where revocation of a licence, even in the first instance, should be seriously

considered. This can include the sale or storage of smuggled alcohol or cigarettes on a licensed premises; the employment of an illegal worker at a licensed premises and the use of a licensed premises to sell or distribute drugs and weapons. Clearly if a premises is found to be committing such serious offences, then the premises and licence holder is severely undermining the licensing objectives. It is likely, under such circumstances, that a licence review will be initiated by the Authority or colleagues within Thames Valley Police, Home Office Immigration Enforcement or the relevant responsible authority with a view to having the licence revoked.

Secretary of State's Guidance (November 2025)

8.41 In completing an operating schedule, applicants are expected to have regard to the statement of licensing policy for their area. They must also be aware of the expectations of the licensing authority and the responsible authorities as to the steps that are appropriate for the promotion of the licensing objectives, and to demonstrate knowledge of their local area when describing the steps they propose to take to promote the licensing objectives. Licensing authorities and responsible authorities are expected to publish information about what is meant by the promotion of the licensing objectives and to ensure that applicants can readily access advice about these matters. However, applicants are also expected to undertake their own enquiries about the area in which the premises are situated to inform the content of the application.

8.42 Applicants are, in particular, expected to obtain sufficient information to enable them to demonstrate, when setting out the steps they propose to take to promote the licensing objectives, that they understand:

- the layout of the local area and physical environment including crime and disorder hotspots, proximity to residential premises and proximity to areas where children may congregate;
- any risk posed to the local area by the applicants' proposed licensable activities; and
- any local initiatives (for example, local crime reduction initiatives or voluntary schemes including local taxi-marshalling schemes, street pastors and other schemes) which may help to mitigate potential risks.

8.43 Applicants are expected to include positive proposals in their application on how they will manage any potential risks. Where specific policies apply in the area (for example, a cumulative impact policy), applicants are also expected to demonstrate an understanding of how the policy impacts on their application; any measures they will take to mitigate the impact; and why they consider the application should be an exception to the policy.

8.44 It is expected that enquiries about the locality will assist applicants when

determining the steps that are appropriate for the promotion of the licensing objectives. For example, premises with close proximity to residential premises should consider what effect this will have on their smoking, noise management and dispersal policies to ensure the promotion of the public nuisance objective. Applicants must consider all factors which may be relevant to the promotion of the licensing objectives, and where there are no known concerns, acknowledge this in their application.

8.45 The majority of information which applicants will require should be available in the licensing policy statement in the area. Other publicly available sources which may be of use to applicants include:

- the Crime Mapping website;
- Neighbourhood Statistics websites;
- websites or publications by local responsible authorities;
- websites or publications by local voluntary schemes and initiatives; and
- on-line mapping tools.

8.46 While applicants are not required to seek the views of responsible authorities before formally submitting their application, they may find them to be a useful source of expert advice on local issues that should be taken into consideration when making an application. Licensing authorities may wish to encourage co-operation between applicants, responsible authorities and, where relevant, local residents and businesses before applications are submitted in order to minimise the scope for disputes to arise.

8.47 Applicants are expected to provide licensing authorities with sufficient information in this section to determine the extent to which their proposed steps are appropriate to promote the licensing objectives in the local area. Applications must not be based on providing a set of standard conditions to promote the licensing objectives and applicants are expected to make it clear why the steps they are proposing are appropriate for the premises.

8.48 All parties are expected to work together in partnership to ensure that the licensing objectives are promoted collectively. Where there are no disputes, the steps that applicants propose to take to promote the licensing objectives, as set out in the operating schedule, will very often translate directly into conditions that will be attached

8.49 For some premises, it is possible that no measures will be appropriate to promote one or more of the licensing objectives, for example, because they are adequately covered by other existing legislation. It is however important that all operating schedules should be precise and clear about the measures that are proposed to promote each of the licensing objectives.

9.12 Each responsible authority will be an expert in their respective field, and

in some cases it is likely that a particular responsible authority will be the licensing authority's main source of advice in relation to a particular licensing objective. For example, the police have a key role in managing the night-time economy and should have good working relationships with those operating in their local area. The police should usually therefore be the licensing authority's main source of advice on matters relating to the promotion of the crime and disorder licensing objective. However, any responsible authority under the 2003 Act may make representations with regard to any of the licensing objectives if they have evidence to support such representations. Licensing authorities must therefore consider all relevant representations from responsible authorities carefully, even where the reason for a particular responsible authority's interest or expertise in the promotion of a particular objective may not be immediately apparent. However, it remains incumbent on all responsible authorities to ensure that their representations can withstand the scrutiny to which they would be subject at a hearing.

Summary

The Licensing Authority is not satisfied that granting this application would promote the prevention of crime and disorder licensing objective.

The concerns arise from a combination of factors:

- Mr Gaba's history of convictions for regulatory offences;
- The serious circumstances identified at the premises involving illegal working;
- The apparent ongoing involvement of Mr Manmeet Singh in the operation of the business;
- The inconsistent information provided to the Licensing Authority regarding Mr Singh's involvement; and
- The absence of an operating schedule sufficiently robust to address the risks identified by the Licensing Authority.

When considered cumulatively, these matters give the Licensing Authority insufficient confidence that the premises would operate in a manner consistent with the promotion of the licensing objectives. The Authority is particularly concerned that the circumstances give rise to a real risk of future non-compliance and criminal activity associated with the operation of the premises.

In accordance with the Licensing Act 2003, the Council's Statement of Licensing Policy, and the Secretary of State's Guidance, the Licensing Authority respectfully submits that refusal of the application is both appropriate and proportionate for the promotion of the licensing objectives.

Case Law

East Lindsey District Council v Abu Hanif (t/a Zara's Restaurant) (2016) this

underpins the principles widely acknowledged within the Licensing Act 2003 that the licensing objectives are prospective, and that the prevention of crime and disorder requires a prospective consideration of what is warranted in the public interest, having regard to the twin considerations of prevention and deterrence.

R (on application of Daniel Thwaites plc) v Wirral Magistrates' Court and Others (2008) EWHC 838 (Admin) This case, referred to as 'the Thwaites case', is important because it emphasises the important role that Responsible Authorities have in providing information to decision makers to contextualise the issue before them. The case recognises that Responsible Authorities are experts in their fields, and that weight should be attached to their representations.

Date Received	25/06/2026	Date Due	23/07/2026
----------------------	------------	-----------------	------------

Date	22	07	2026
-------------	----	----	------

THAMES VALLEY POLICE Appendix MH003

Division/Station : Reading Police Station Licensing Dept

From : C2107 Declan Smyth

To : Reading Borough Council

Ref : M&M Food & Wine, 55-57 Wokingham Road, Reading, RG6 1LH

Date : 16th July 2026

Subject :

OBJECTION

I, C2107 Declan Smyth, on behalf of the Chief Officer of Thames Valley Police, wish to formally object to the application for a Premises Licence submitted in respect of M&M Food & Wine, 55-57 Wokingham Road, Reading, RG6 1LH.

- Applicant / Proposed Premises Licence Holder: Kulwant Singh Gaba
- Proposed Designated Premises Supervisor: Kulwant Singh Gaba

Prior to this application Thames Valley Police can confirm that no contact has been received from the applicant or their licensing advisors in relation to this application in order to discuss any concerns which we may have had in relation to this and to determine any information that could have been supplied relating to our advice on local issues.

Paragraph 8.46 of the Secretary of States Guidance issued under Sec 182 Licensing Act 2003 states “While applicants are not required to seek the views of responsible authorities before formally submitting their application, they may find them to be a useful source of expert advice on local issues that should be take into consideration when making an application.”

Thames Valley Police ("TVP"), as a Responsible Authority, makes this representation with the objective of promoting the licensing objectives, in particular:

- The Prevention of Crime and Disorder
- Public Safety

The application seeks authorisation for:

- Supply of Alcohol (Off Sales): Monday to Sunday 07:00 – 00:00
- Opening Hours: Monday to Sunday 07:00 – 00:00

TVP's representation is made on the basis that the proposed Premises Licence Holder and Designated Premises Supervisor has previous relevant convictions and that immigration enforcement activity at the premises has identified unlawful working. These matters directly engage the crime and disorder

objective and raise serious concerns regarding the applicant's suitability to hold a premises licence and act as Designated Premises Supervisor.

SUMMARY OF TVP POSITION

TVP's objection relates primarily to:

1. The suitability of the proposed Premises Licence Holder and DPS in light of previous relevant convictions.
2. Concerns regarding the management and control of the premises following enforcement action by Home Office Immigration Enforcement.
3. The serious risk that the grant of the licence would undermine the licensing objective of the prevention of crime and disorder.

The Licensing Act 2003 makes clear that the prevention of crime and disorder is a paramount licensing objective. The Home Office Section 182 Guidance further states that licensing authorities should treat the prevention of crime and disorder as the primary consideration when carrying out licensing functions.

EVIDENCE AND MATTERS RELIED UPON

A) Relevant Convictions

TVP is aware that the proposed Premises Licence Holder and Designated Premises Supervisor has previous relevant convictions.

The existence of relevant convictions is a significant matter for the Licensing Authority when determining whether an applicant is suitable to be entrusted with the responsibilities associated with holding a premises licence and supervising the sale of alcohol.

The role of the DPS carries a statutory responsibility for the day-to-day promotion of the licensing objectives and for ensuring that the premises operates lawfully and responsibly. Where an applicant has a history of relevant offending, TVP considers that there are legitimate concerns as to whether the licensing objectives, particularly the prevention of crime and disorder, will be promoted.

B) Home Office Immigration Enforcement Activity

TVP understands that the premises has previously been subject to a visit on the 17th June 2026 by Home Office Immigration Enforcement during which an illegal worker was identified as being employed at the premises.

The employment of an individual who is not entitled to work in the United Kingdom is a serious matter and demonstrates a failure to exercise proper management controls and due diligence.

The Licensing Act 2003 and Home Office Guidance specifically identify the use of licensed premises for unlawful working as a crime and disorder issue.

TVP submits that the discovery of an illegal worker at the premises is highly relevant to the Licensing Sub-Committee's consideration of whether the applicant can be relied upon to promote the licensing objectives.

C) Prevention of Crime and Disorder

TVP submits that the combination of:

- The applicant's previous relevant convictions; and
- The identification of an illegal worker by Home Office Immigration Enforcement at the premises (17th June 2026)

creates a significant risk that the licensing objective of preventing crime and disorder will be undermined if the application is granted.

The matters identified above are not isolated licensing concerns but relate directly to compliance with legislation and the ability of the applicant to operate licensed premises responsibly and lawfully.

TVP is not satisfied that the operating schedule submitted with the application adequately addresses these concerns or provides sufficient reassurance that robust management controls will be implemented. Whilst the operating schedule contains standard conditions relating to CCTV, staff training and Challenge 25, these measures do not mitigate concerns arising from previous criminality and immigration compliance failures.

Under Section 18(9)(a) and (b) of the Licensing Act 2003 Thames Valley Police believe that due to the exceptional circumstances in this case we are satisfied that the designation of Kulwant Singh Gaba as the premises licence holder & premises supervisor would undermine the crime prevention objective.

The current Section 182 Secretary of State's guidance states at para 4.39

The police may object to the designation of a new DPS where, in exceptional circumstances, they believe that the appointment would undermine the crime prevention objective. The police can object where, for example, a DPS is first specified in relation to particular premises and the specification of that DPS in relation to the particular premises gives rise to exceptional concerns. For example, where a personal licence holder has been allowed by the courts to retain their licence despite convictions for selling alcohol to children (a relevant offence) and then transfers into premises known for underage drinking.

Due to its serious nature we believe it represents “exceptional circumstances” as set out above and that his appointment as DPS and premises licence holder of the business would therefore undermine the crime prevention objective.

REQUESTED DETERMINATION

TVP's position is that the application should be refused.

The prevention of crime and disorder is the licensing objective engaged by this representation. Given the applicant's relevant convictions and the history of illegal working identified at the premises, TVP is not satisfied that granting the application would promote that objective.

CONCLUSION

TVP respectfully submits that the Licensing Sub-Committee should give significant weight to:

- The previous relevant convictions held by the proposed Premises Licence Holder and DPS;
- The findings of Home Office Immigration Enforcement identifying illegal working at the premises; and
- The consequent impact upon the prevention of crime and disorder licensing objective.

Accordingly, Thames Valley Police respectfully requests that the Licensing Sub-Committee REFUSE the application.

Appendices

TVP1 26-07-07 TVP Request for Discussion Email

TVP2 26-07-16 TVP Disclosure Print - Kulwant Singh Gaba

TVP3 East Lindsey District Council V Abu Hanif 2016

From: [Declan Smyth \(C2107\)](#)
To: [REDACTED]
Cc: [REDACTED]
Subject: M & M Food & Wine, 55-57 Wokingham Road, Reading RG6 1LH – Request for Discussion
Date: 07 July 2026 09:12:00
Attachments: [image001.png](#)
[image003.png](#)
[image004.png](#)

Dear Mr Kapoor,
I hope you are well.

I am writing in relation to the premises licence application for **M & M Food & Wine, 55-57 Wokingham Road, Reading RG6 1LH**, submitted on behalf of Mr Kulwant Singh Gaba.

Please could you contact me directly at your earliest convenience so that we can discuss the application and the concerns that have been identified.

At present, **Thames Valley Police intend to submit a formal representation (objection)** to the application on the basis that the premises is considered to present a higher risk in relation to the licensing objectives. The concerns include:

1. The discovery of an **illegal worker** at the premises during previous enforcement activity.
2. The **applicant's relevant convictions**, which raise concerns regarding the promotion of the licensing objectives, particularly the prevention of crime and disorder.

I would welcome the opportunity to discuss these matters with you before the representation is submitted and explain the basis upon which Thames Valley Police intend to object to the application. Please feel free to contact me directly by telephone or email.

Kind regards,
Declan

Declan Smyth C2107
Alcohol Licensing Officer – Reading.
Licensing Office
Reading Police Station
Atlantic House,
Imperial Way,
Reading
RG2 0TD
[REDACTED]
[REDACTED]
AlcoholLicensing@thamesvalley.police.uk
www.thamesvalley.police.uk

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]



Responsibility	Percentage
Current government	45%
Previous government	35%
External factors	15%
Internal factors	5%

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Judgments

QBD, ADMINISTRATIVE COURT

Neutral Citation Number: [2016] EWHC 1265 (Admin)

CO/345/2016

IN THE HIGH COURT OF JUSTICE

QUEEN'S BENCH DIVISION

THE ADMINISTRATIVE COURT

Royal Courts of Justice

Strand

London WC2A 2LL

Thursday, 14 April 2016

B e f o r e:

MR JUSTICE JAY

Between:

EAST LINDSEY DISTRICT COUNCIL

Appellant

v

ABU HANIF

(TRADING AS ZARA'S RESTAURANT AND TAKEAWAY)

Respondent

Computer- Aided Transcript of the Stenograph Notes of

WordWave International Limited trading as DTI

165 Fleet Street London EC4A 2DY

Tel No: 020 7404 1400 Fax No: 020 7404 1424

(Official Shorthand Writers to the Court)

Mr P Kolvin QC & Mr D Dadds (instructed by David Dadds LLP) appeared on behalf of the **Appellant**

The **Respondent** did not appear and was not represented

J U D G M E N T

(Approved)

Crown copyright©

1. MR JUSTICE JAY: This is an appeal by way of case stated from the decision of the Lincoln Magistrates' Court, District Judge Veits, given on 23 June 2015, whereby he allowed an appeal from the revocation of a premises licence by the licensing authority.
2. The appellant, the East Lindsey District Council, is the licensing authority. The Magistrates' Court in the usual way is not a party to these proceedings. The respondent, Mr Abu Hanif, trading as Zara's Restaurant and Takeaway, is the licence holder. He through a licensing consultant has submitted correspondence making various limited points, but indicating that he would not be taking any part in these proceedings.
3. The premises in question are Zara's Restaurant and Takeaway situated in North Summercoates on the Lincolnshire coast. They are licensed to sell alcohol ancillary to the supply of food. The restaurant is owned and managed by the licensee, Mr Hanif. On 29 April 2014, the premises were the subject of a joint visit by the police and immigration officers, and it was discovered that Mr Miah was working in the kitchen as a chef. It was common ground that Mr Miah had no current entitlement to remain in the UK, let alone to work. I was told that he arrived here illegally some years ago. Furthermore, it was also accepted by the respondent that he (i) employed Mr Miah without paperwork showing a right to work in the United Kingdom; (ii) paid Mr Miah cash in hand; (iii) paid Mr Miah less than the minimum wage; (iv) did not keep or maintain PAYE records; (v) purported to deduct tax from Mr Miah's salary; and (vi) did not account to HMRC for the tax deducted.
4. The police then applied for a review of the respondent's licence under section 51 of the Licensing Act 2003 and the matter came before the appellant's subcommittee on 30 June 2014. The subcommittee decided to revoke the respondent's licence. Its reasons were as follows:
5. "The subcommittee were satisfied that Mr Hanif did not take the appropriate checks of staff members having knowledge that there were problems previously at the other premises with overstayers, and that he continued to allow staff to work at Zara's restaurant without making appropriate checks.
6. The subcommittee were satisfied that Mr Hanif had not undertaken the relevant checks to ensure the employee concerned was eligible to work in the United Kingdom. Instead of not allowing employees to work if they had not provided the correct documentation he allowed them to work and paid cash in hand. With all this in mind the subcommittee were satisfied that Mr Hanif had knowingly employed person/s unlawfully in the United Kingdom.

7. The subcommittee considered the evidence by Mr Kheng on behalf of Mr Hanif and the Home Office section 182 Guidance to Licensing Authorities. The subcommittee were of the view that the premises licence should be revoked and that revocation was an appropriate step with a view to promoting the crime prevention licensing objective."
8. The respondent then appealed to the Magistrates' Court. There was a hearing on 27 March 2015, and on 23 June the district judge decided to allow the respondent's appeal. On 1 September 2015, the district judge determined the issue of costs and on 7 January 2016 he stated the case. The appeal to the district judge was de novo, but he accepted that he could only allow the appeal if the subcommittee's decision was "wrong", the burden being on the appellant before him to establish that.
9. Looking now at the stated case, the district judge noted that the respondent had received a civil penalty for employing an illegal worker under section 15 of the Immigration, Asylum and Nationality Act 2006. An immigration officer gave evidence to the effect that although by virtue of section 21 a criminal offence was committed, such proceedings were rarely brought. The district judge also noted that the police and the Council's licensing officer were no longer saying that the respondent was a serial offender, but a redacted report which was placed before the subcommittee still gave the impression that he "was in a much worse position than he actually was". As for the failure to pay the minimum wage, the district judge said this:
 - A. "In his evidence before me Mr Hanif accepted that he had not paid the minimum wage and this in itself can be a criminal offence. I found that this was not the main basis of the subcommittee's decision however and again there was no evidence that he had been reported for that alleged offence. It would appear from their reasons that the subcommittee used the evidence of paying cash in hand as justification for the finding that he knowingly employed Mr Miah. The prosecuting authority however appear to have taken a different view in offering the civil penalty."
10. The district judge's core reasoning was that no crime had been committed. As he put it:
 - A. "It appeared to me that no crime had been committed as a result of the visit to the premises in April of last year. A civil penalty had been imposed rather than prosecution for the section 21 offence and no other crime had been reported in relation to not paying the minimum wage."
11. In the district judge's view, the crime prevention objective was not engaged.
12. The district judge also criticised the subcommittee for adopting an inconsistent approach because in other similar cases only warnings were issued. Finally, he considered that the subcommittee may have been influenced by comments in the police report, leading them to believe that they were dealing with a serial offender.

13. At the conclusion of the stated case, the district judge posed two questions for my determination. I will address these at the end of my judgment.
14. I was taken by Mr Philip Kolvin QC to various provisions of the Licensing Act 2003 as amended. Under section 4(1) and (2) a licensing authority must carry out its licensing functions with a view to promoting the licensing objectives, which include "the prevention of crime and disorder". The provisions dealing with the review application brought by the police are contained in sections 51 and 52. Under section 52(3), the licensing authority (and on appeal the Magistrates' Court):
 - A. "... must, having regard to the application and any relevant representations, take such of the steps mentioned in subsection (4) (if any) as it considers appropriate for the promotion of the licensing objectives."
15. The epithet "appropriate" was introduced by amendment in 2011. Previously the test had been stricter. In my judgment, it imports by necessary implication the concepts of proportionality and relevance.
16. Mr Kolvin submitted that the district judge erred in a number of respects. First, he wrongly held that, given that criminal proceedings were never brought, the crime prevention objective (see section 4(2)) was not engaged. The statute is concerned with the prevention rather than the fact of crime. Secondly, and in any event, the interested party had committed criminal offences in relation to tax evasion, the employment of an illegal worker, and employing an individual at remuneration below the minimum wage. As for the employment of an illegal worker, Mr Kolvin accepted that this requires knowledge on the part of the employer, and he also accepted that it is not altogether clear whether the district judge found as a fact that the respondent possessed the requisite knowledge. However, the core question is the promotion of the licensing objectives, not the fact of anterior criminal activity, and in this regard a deterrence approach is appropriate.
17. Thirdly, Mr Kolvin submitted that there was no evidence of an inconsistent approach by the subcommittee in giving warnings in some cases because all cases turn on their own facts. Finally, Mr Kolvin submitted that there was no basis for the district judge's conclusion that the subcommittee may have been influenced by a suggestion that the respondent was a serial offender.
18. I accept Mr Kolvin's submissions. In my view the district judge clearly erred. The question was not whether the respondent had been found guilty of criminal offences before a relevant tribunal, but whether revocation of his licence was appropriate and proportionate in the light of the salient licensing objectives, namely the prevention of crime and disorder.

This requires a much broader approach to the issue than the mere identification of criminal convictions. It is in part retrospective, in as much as antecedent facts will usually impact on

the statutory question, but importantly the prevention of crime and disorder requires a prospective consideration of what is warranted in the public interest, having regard to the twin considerations of prevention and deterrence. The district judge's erroneous analysis of the law precluded any proper consideration of that issue. In any event, I agree with Mr Kolvin that criminal convictions are not required.

19. To the extent that the analysis must be retrospective, the issue is whether, in the opinion of the relevant court seized of the appeal, criminal offences have been committed. In the instant case they clearly had been: in relation to tax evasion (see the common law offence of cheating the Revenue and the offence of fraudulent evasion of tax contrary to section 106A of the Taxes and Management Act 1970); and the employment of Mr Miah at remuneration below the minimum wage (see section 31 of the National Minimum Wage Act 1998). Moreover, given the evidence that Mr Miah never provided the relevant paperwork, notwithstanding apparent requests, the obvious inference to be drawn is that the respondent well knew that he could not, and that no tax code and National Insurance number had been issued. The corollary inference in my judgment is that the respondent well knew that Mr Miah could not provide the relevant paperwork because he was here illegally.
20. I also accept Mr Kolvin's submission that each case must turn on its own facts. As a matter of law, unless it could be said that some sort of estoppel or related abuse of process arose in the light of warnings given in other cases, the alleged inconsistent approach led nowhere. In my judgment, it could not be so said.
21. Finally, I agree with Mr Kolvin that there is nothing in the point that the subcommittee could have been misled about the interested party being a serial offender. The point that the subcommittee was making was the fact that the respondent had worked at premises where illegal workers were also employed meant that he should have been vigilant to the issue.
22. Thus the answer to the district judge's two questions are as follows:
 - A. Q. "Was I correct to conclude that the crime prevention objective was not engaged as no crimes had been proceeded with, the appellant only receiving a civil penalty?"
 - B. No.
 - C. Q. "Was I correct in concluding that the respondent had been inconsistent in similar decisions in not revoking the licence [sic]?"
 - D. No.

23. Having identified errors of law in the district judge's decision, the next issue which arises is whether I should remit this case for determination in the light of my ruling or whether I have sufficient material to decide the issue for myself. I should only adopt the latter course if satisfied that the issue is so obvious that no useful purpose would be served by remission. I am so satisfied. Having regard in particular to the twin requirements of prevention and deterrence, there was in my judgment only one answer to this case. The respondent exploited a vulnerable individual from his community by acting in plain, albeit covert, breach of the criminal law. In my view his licence should be revoked. Another way of putting the matter is that the district judge had no proper basis for overturning the subcommittee's assessment of the merits.
24. It follows in my judgment that the only conclusion open to the district judge in the present case was to uphold the revocation of the respondent's licence. This appeal must be allowed and the respondent's licence must be revoked.
25. MR KOLVIN: My Lord, I'm very grateful. Can I deal with the question of costs, both here and below.
26. MR JUSTICE JAY: Yes.
27. MR KOLVIN: Should I start with here.
28. MR JUSTICE JAY: Yes.
29. MR KOLVIN: My Lord, we would ask for the costs before this court. I just want to pray in aid four very brief points. The first is the result. The second is that the district judge's approach was expressly urged on him by the respondent's legal team. Thirdly, that the respondent was expressly urged to concede this appeal to stop costs running, he was given that opportunity at pages 42 and 43 of the bundle. Fourthly, perhaps a little bit tugging at the heart strings, but there's no reason why the Council Tax payers of East Lindsey should bear the cost of establishing what has been established in this court. So we would ask for the costs up here.
30. There is a schedule and the schedule has been served upon Mr Hanif by letter dated 16 March of 2016. I don't know whether the schedule has found its way to my Lord, if not I can hand up a copy.
31. MR JUSTICE JAY: It has.
32. MR KOLVIN: It has. My Lord, I can see that VAT has been added on. It doesn't need to be because of course the Council can retrieve the VAT, so my application is for £16,185. I know there's not a lot of explanation around my fee, but it was

taken on a single fee for all work involved in relation to the case stated; advice, the skeleton argument and attendance today, so it's one single - -

33. MR JUSTICE JAY: What about your junior's fees?

34. MR KOLVIN: My learned junior is also my instructing solicitor, he wears two hats.

35. MR JUSTICE JAY: I see.

36. MR KOLVIN: He has his own firm which is Dadds LLP, and he is also a member of the bar, so although he has appeared as my junior, his fee is wrapped up in the solicitors' fees set out in the schedule.

37. MR JUSTICE JAY: Okay. What about the costs below?

38. MR KOLVIN: My Lord, I'm just trying to ascertain what the position is.

39. MR JUSTICE JAY: I thought there was no order for costs below.

40. MR KOLVIN: There was no order for costs below, that was on the basis that the appeal had been allowed. The situation in relation to costs of licensing appeals are set out in section 181 of the Act, which enables the court to make such order as it thinks fit. Normally when appeals are dismissed there is no real question about it, costs follow the event. When appeals are allowed, some further considerations come into play, which are expressed by the Master of the Rolls in a case which you may have come across called City of Bradford v Booth, which is the case where the Master of the Rolls said that local authorities shouldn't be put off from trying to make honest and reasonable decisions in the public interest. And so one has to take account additionally of the means of the parties and their conduct in relation to the dispute, but in this case of course the appeal has now been dismissed, and so we would say that the ordinary rule is that the costs should follow the event, the appeal having failed. I'm just trying to ascertain whether schedules were ever served below, in the light of the way the case came out. **(Pause)**

41. My Lord, I'm really sorry that we don't actually have the schedule here, apparently it was £15,000. If you were minded to order costs below the options are either I suppose to wait and we will have the thing emailed up, or to say, "Look, it was below, it's a little bit more complex, they should be assessed if not agreed."

42. MR JUSTICE JAY: This is going to wipe him out, isn't it?

43. MR KOLVIN: Well he has already said, I have to say, I'm just telling you frankly what I've been told this morning, that when the bundles and the schedules were

served on him, he had clearly read them, but he said, "If you win in the High Court and get costs against me, then I'm just going to declare myself bankrupt." So there may well be a bit of football(?) about this, but nonetheless it was his appeal, his team raised a point which in retrospect was very surprising, and caused an awful lot of costs to be incurred.

44. MR JUSTICE JAY: Yes. Well I am going to assess the costs here in the round figure of £15,000.

45. MR KOLVIN: Thank you.

46. MR JUSTICE JAY: If there was a schedule, which you tell me there was, below, it is proportionate that I assess those costs rather than put you to the trouble of a detailed assessment, so if you could have that emailed to my clerk in due course, I will assess the costs below.

47. MR KOLVIN: Thank you, my Lord.

48. MR JUSTICE JAY: On the basis of that schedule.

49. MR KOLVIN: We're not trying to be too ambitious, but we would like to see what we can - -

50. MR JUSTICE JAY: I'll take a broad brush approach to that.

51. MR KOLVIN: Thank you.

52. My Lord, the only other thing to mention is that this isn't the only case which is kicking around the east of England where licensing subcommittees are being urged to take no action because there has been no prosecution in these immigration cases. Although I appreciate that this is hardly stellar law making, it's an application of pretty well established legal principles to the facts, I'm asking whether my Lord would be minded to certify this so that we can adduce the authority in other cases, because it's a clear statement of the law that there doesn't need to have been a prosecution. So with the practice direction in mind, would my Lord be minded to - -

53. MR JUSTICE JAY: Just remind me of the practice direction.

54. MR KOLVIN: Yes, can I hand it up?

55. MR JUSTICE JAY: Yes. **(Handed)**

56. MR KOLVIN: If Mr Hanif had come I wouldn't need to make the application. It's paragraph 6.1. The judgment has to clearly indicate that it purports to establish a new principle or extends the present law and that has to take the form of an express statement to that effect, and then 6.2 says what categories of judgment we're dealing with, which include applications attended by one party only.
57. So that's the situation we're in. In reality these judgments get around anyway, because we're dealing with administrative tribunals and not courts, but sometimes the point is taken, "Ah yes, but the court didn't certify".
58. MR JUSTICE JAY: But where's the new principle I've established?
59. MR KOLVIN: My Lord, what you have said clearly, which hasn't been said before, by dint of the fact that not many licensing cases reach the lofty heights of this building, is that there does not need to have been a prosecution in order for the crime to have - -
60. MR JUSTICE JAY: Oh, I see. Well that's so obvious it almost goes without saying, that's why it hasn't been said before.
61. MR KOLVIN: My Lord, it was obvious to everyone except the district judge, the appellant and other licensees in the east of England.
62. MR JUSTICE JAY: Okay.
63. In terms of the logistics, if you want a copy of the judgment, don't you have to pay for it?
64. MR KOLVIN: We may have to, and we would be obviously very pleased to do so.
65. MR JUSTICE JAY: Because I'm not sure that all judgments are, in the Administrative Court, they're not all transcribed and published.
66. MR KOLVIN: That is correct, and I have no doubt that my client would be - this isn't a matter about the costs of the judgment.
67. MR JUSTICE JAY: No, fortunately it doesn't cost that much. But I will give the certification. I have never been asked to do so before, I must confess.
68. MR KOLVIN: Yes.

69. MR JUSTICE JAY: Because these cases are referred to almost willy nilly, if they're available on Lawtel or wherever.
70. MR KOLVIN: Yes, they are.
71. MR JUSTICE JAY: Then they're just provided.
72. MR KOLVIN: They get into the textbooks and they - -
73. MR JUSTICE JAY: No- one objects.
74. MR KOLVIN: Yes. It has happened once before, in relation to the meaning of the Court of Appeal judgment in Hope and Glory, and Lindblom J, as he then was, was asked repeatedly would he certify in relation to the meaning of Hope and Glory, which is an important test, and he was pretty engaged in the practice direction. But since then that judgment, there's always an argument in court about whether it can be cited or not. The difference between licensing and some other fields of law is that very few cases reach here, so when they do, the judgments of High Court judges are gold dust.
75. MR JUSTICE JAY: Yes, well I'm happy to make the certification.
76. MR KOLVIN: Thank you very much indeed.
77. MR JUSTICE JAY: We wouldn't want this point to be taken again successfully.
78. MR KOLVIN: No.
79. MR JUSTICE JAY: Now as a matter of courtesy, is the judgment, once available, sent to the district judge, or is it something that I should do informally?
80. MR KOLVIN: I don't know, my Lord, what the normal practice is. I don't think that I have previously been on a legal team which has sent judgments, but we're very happy to undertake to do so.
81. MR JUSTICE JAY: Yes, I think if you're going to get a copy, obviously you're going to send it to the respondent - -
82. MR KOLVIN: Indeed.

83. MR JUSTICE JAY: - - so he can ingest it. I think you should send it to the district judge, just saying that the judge directed that out of courtesy he should see it.
84. MR KOLVIN: We're very happy to do that. Thank you very much indeed.
85. MR JUSTICE JAY: Thank you very much.

Appendix MH004



Name of Officer	Alec Coomber
Type of Application	Grant of Premises Licence – Licensing Act 2003
Name of Premises	M & M Food and Wine
Address	55-57 WOKINGHAM ROAD, READING, RG6 1LH
Content of Application:	
Grant of licence submitted by Kulwant Singh Gaba on 25 June 2026 in relation to the premises above.	
Officer's Comments:	
On behalf of Environmental Health as a responsible authority, the Food & Safety Team wish to make representation regarding the application for the grant of a premises licence at M & M Food and Wine, 55-57 Wokingham Road, Reading, RG6 1LH. We consider that the premises undermines the promotion of the licensing objective of the prevention of crime and disorder. Our grounds for this representation are as follows: In the past five years, six enforcement notices have been served on the premises for breaches of food safety and health and safety law. On 7 November 2022, three Hygiene Improvement Notices were served (Appendix A): • PR202411-824928 / 004033 – Flooring did not allow adequate cleaning. • PR202411-824929 / 004034 – Stockroom poorly organised preventing adequate cleaning and pest control. • PR202411-824930 / 004035 – Inadequate pest proofing. There is no indication on our records that these notices were complied with and at subsequent inspections, similar conditions have been observed. On 24 May 2026, and a further Hygiene Improvement Notice was served (Appendix B): • PR202511-1174436 – Inadequate pest proofing. As of 22 July 2026, we have not seen evidence that this notice has been complied with. Failing to comply with a Hygiene Improvement Notice is a criminal offence. On 8 June 2026, two Health and Safety at Work Prohibition Notices were served (Appendix C): • PR202606-1274867 – Unsafe light switch in the rear storeroom with exposed live wires in contact with water due to a leak. • PR202606-1274877 – Unsafe splitting of a single electrical cable in two in the rear storeroom. These electrical problems have been rectified and the Prohibition Notices lifted. However, on a visit to the premises on 16 June 2026 the lighting circuit was switched on as the lights had been used to paint the floor, despite the notice PR202606-1274867 prohibiting the business from using the lighting circuit (Appendix D). Breaching a Prohibition Notice is a criminal offence.	

M & M Food and Wine has been registered as a food business under the limited company M&M Food and Wine Ltd, 55-57 Wokingham Road, Reading, England, RG6 1LH since 7 October 2020. Since at least April 2026, the limited company responsible for food safety at the premises has been Dil Ander Food and Wine Ltd, 55-57 Wokingham Road, Reading, England, RG6 1LH. However, despite having been advised to do so by the Food & Safety Team, Dil Ander Food and Wine Ltd has not registered their food business with Reading Borough Council (Appendix E). It is a legal requirement for a food business to register its premises with the local authority and failing to do so is a criminal offence.

Summary and Recommendation:

Despite the service of four Hygiene Improvement Notices over the course of several visits, M & M Food and Wine has failed to comply. A Health and Safety at Work Prohibition Notice was also breached. The operators have failed to register their food business despite being advised to do so, meaning three separate offences have been committed at the premises. Therefore, we believe that the premises does not promote the licensing objective of the prevention of crime and disorder, and the application should be refused.

Date Received	29/06/2026	Consultation End	23/07/2026
Signed	Alec Coomber	Date	22/07/2026

Appendix A – Hygiene Improvement Notices served on 7 November 2022

004033

**The Food Safety and Hygiene (England) Regulations 2013 -
Regulation 6**

HYGIENE IMPROVEMENT NOTICE

1. To: M&M FOOD AND WINE LTD (Company number 12361577) *Food Business Operator*

at: Registered office address -
55-57 Wokingham Road, Reading, England, RG6 1LH *Address of Food Business Operator*

I have reasonable grounds for believing that you are failing to comply with the Hygiene Regulations because:

2. The stock room has a concrete floor which is not sealed to enable it to be wet cleaned. *Officer to insert grounds for believing that the Hygiene Regulations are being breached*

In connection with your food business

M&M Food and Wine *Name of Food Business*

at: 55-57 Wokingham Road, Reading, England, RG6 1LH *Address of Food Business*

The matters which constitute your failure to comply are

See **Part A** of the **Schedule** which forms part of this Hygiene Improvement Notice. *Officer to insert provision(s) of the Hygiene Regulations which is/are being breached and why*

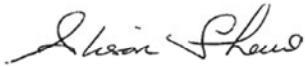
3. In my opinion, the following measure(s) are needed for you to comply with the Hygiene Regulations:

See **Part B** of the **Schedule** which forms part of this Hygiene Improvement Notice

4. The measure or measures that will achieve the same effect **must be taken by:**

DAY: **7th** MONTH: **November** YEAR: **2022**

5. **IT IS AN OFFENCE NOT TO COMPLY WITH THIS HYGIENE IMPROVEMENT NOTICE BY THE DATE STATED.**

Signed: 
(Authorised Officer)

Name: Alison Shaw

Date: 12/10/22

Address: Public Protection (Food Safety)
Civic Offices, Reading
RG1 2LU

Telephone 0118 9372921 (direct line)

Email: alison.shaw@reading.gov.uk

Please read the notes overleaf carefully.

If you are not sure of your rights or the implications of this notice, you may want to seek legal advice.

Hygiene Improvement Notice

NOTES

1. In the opinion of the authorised officer, you are not complying with the Hygiene Regulations as described in paragraph 2 of the notice. The work needed in the officer's opinion to put matters right is described and it must be finished by the date set.
2. You are responsible for ensuring that the work is carried out within the period specified, which must be at least 14 days from the date of the notice.
3. You have a right to carry out work that will achieve the same effect as that described in the notice. If you think that there is another equally effective way of complying with the law, you should first discuss it with the officer.

YOUR RIGHT OF APPEAL

4. In accordance with Regulation 22 of the Food Safety & Hygiene (England) Regulations 2013, if you disagree with all or part of this notice, you can appeal to the Magistrates' Court. You must appeal within one calendar month of the date of the notice or the period ending with the date stated in paragraph 4 of the notice, whichever ends earlier.
5. If you decide to appeal, the time set out in the notice is suspended and you do not have to carry out the work described until the appeal is heard. However, if you are not complying with the Regulations mentioned in the notice, you may still be prosecuted for failure to comply with those Regulations.
6. When the appeal is heard, the Magistrates' Court may confirm, cancel or vary the notice.

WARNING

FAILURE TO COMPLY WITH THIS NOTICE IS A CRIMINAL OFFENCE

Offenders are liable to be fined and/or imprisoned for up to 2 years.

Reading Magistrates' Court Civic Centre Castle St Reading RG1 7TQ



**The Food Safety and Hygiene (England) Regulations 2013 –
Regulation 6**

HYGIENE IMPROVEMENT NOTICE – SCHEDULE

Part A – The following matters, noted during an inspection on 10/10/22, which constitute your failure to comply are:

The stock room has a concrete floor that cannot be effectively washed.

This is in contravention of Annex II, Chapter II, Paragraph 1a of Regulation (EC) No. 853/2004 on the Hygiene of Foodstuffs and hence is a failure to comply with Article 4(2) of that Regulation.

Part B – In my opinion, the following measure(s) are needed for you to comply with the Hygiene Regulations:

Seal the floor in the stock with an impervious epoxy resin coating that will prevent water being absorbed into the concrete and will additionally allow effective mopping.

Or

Cover the floor with ceramic floor tiles, vinyl flooring, laminate type flooring or other such covering that will permanently stick to the concrete allowing no gap for insects to hind underneath and additionally allowing the floor to mopped or wiped clean.



**The Food Safety and Hygiene (England) Regulations 2013 -
Regulation 6**

HYGIENE IMPROVEMENT NOTICE

1. To: M&M FOOD AND WINE LTD (Company number 12361577) *Food Business Operator*
- at: Registered office address -
55-57 Wokingham Road, Reading, England, RG6 1LH *Address of Food Business Operator*

I have reasonable grounds for believing that you are failing to comply with the Hygiene Regulations because:

2. **The layout, design and construction of the stock room prevents proper cleaning.** *Officer to insert grounds for believing that the Hygiene Regulations are being breached*

In connection with your food business

- M&M Food and Wine *Name of Food Business*
- at: 55-57 Wokingham Road, Reading, England, RG6 1LH *Address of Food Business*

The matters which constitute your failure to comply are

- See **Part A** of the **Schedule** which forms part of this Hygiene Improvement Notice. *Officer to insert provision(s) of the Hygiene Regulations which is/are being breached and why*

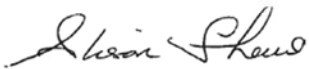
3. In my opinion, the following measure(s) are needed for you to comply with the Hygiene Regulations:

See **Part B** of the **Schedule** which forms part of this Hygiene Improvement Notice

4. The measure or measures that will achieve the same effect **must be taken by:**

DAY: **7th** MONTH: **November** YEAR: **2022**

5. **IT IS AN OFFENCE NOT TO COMPLY WITH THIS HYGIENE IMPROVEMENT NOTICE BY THE DATE STATED.**

Signed: 
(Authorised Officer)

Name: Alison Shaw

Date: 12/10/22

Address: Public Protection (Food Safety)
Civic Offices, Reading
RG1 2LU

Telephone 0118 9372921 (direct line)

Email: alison.shaw@reading.gov.uk

Please read the notes overleaf carefully.

If you are not sure of your rights or the implications of this notice, you may want to seek legal advice.

Hygiene Improvement Notice

NOTES

1. In the opinion of the authorised officer, you are not complying with the Hygiene Regulations as described in paragraph 2 of the notice. The work needed in the officer's opinion to put matters right is described and it must be finished by the date set.
2. You are responsible for ensuring that the work is carried out within the period specified, which must be at least 14 days from the date of the notice.
3. You have a right to carry out work that will achieve the same effect as that described in the notice. If you think that there is another equally effective way of complying with the law, you should first discuss it with the officer.

YOUR RIGHT OF APPEAL

4. In accordance with Regulation 22 of the Food Safety & Hygiene (England) Regulations 2013, if you disagree with all or part of this notice, you can appeal to the Magistrates' Court. You must appeal within one calendar month of the date of the notice or the period ending with the date stated in paragraph 4 of the notice, whichever ends earlier.
5. If you decide to appeal, the time set out in the notice is suspended and you do not have to carry out the work described until the appeal is heard. However, if you are not complying with the Regulations mentioned in the notice, you may still be prosecuted for failure to comply with those Regulations.
6. When the appeal is heard, the Magistrates' Court may confirm, cancel or vary the notice.

WARNING

FAILURE TO COMPLY WITH THIS NOTICE IS A CRIMINAL OFFENCE

Offenders are liable to be fined and/or imprisoned for up to 2 years.

Reading Magistrates' Court
Civic Centre
Castle St
Reading
RG1 7TQ

**The Food Safety and Hygiene (England) Regulations 2013 –
 Regulation 6**

HYGIENE IMPROVEMENT NOTICE – SCHEDULE

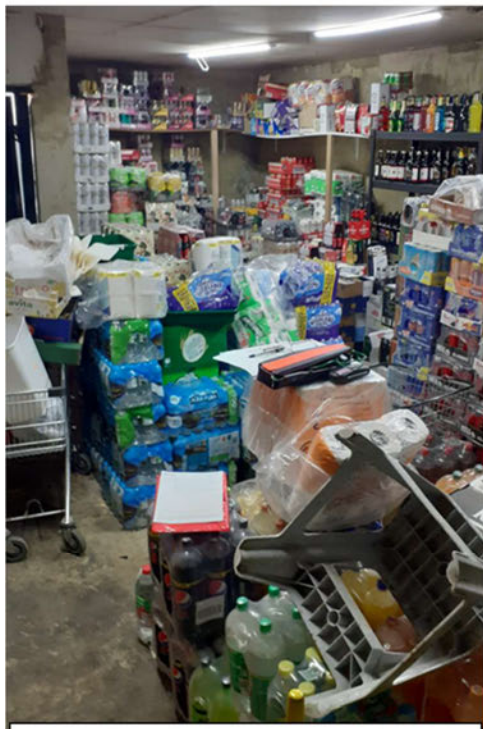
Part A – The following matters, noted during an inspection on 10/10/22, which constitute your failure to comply are:

Much of the stock in the stock room is either: directly on the floor, on shelving that is too low to the ground or on pallets too low to the ground. Consequently, the floor cannot be easily cleaned because of the amount of stock on it, the shelving and pallets (being so low) hamper thorough visual inspection and as a hand cannot easily fit under the pallets and shelves the floor cannot be cleaned.

This is in contravention of Annex II, Chapter I, Paragraph 2a of Regulation (EC) No. 853/2004 on the Hygiene of Foodstuffs and hence is a failure to comply with Article 4(2) of that Regulation.

Part B – In my opinion, the following measure(s) are needed for you to comply with the Hygiene Regulations:

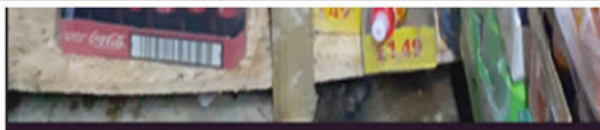
In order to make cleaning easy you must rearrange the stock room so that **all** stored food is at least 1 foot off the floor.



Too much stock placed directly on floor, clean & also cannot inspect for pests.



Pallets too close to floor to allow cleaning & also inspection for pests.



Wooden shelves too close to floor to allow cleaning & also inspection for pests.

**The Food Safety and Hygiene (England) Regulations 2013 -
Regulation 6**

HYGIENE IMPROVEMENT NOTICE

1. To: M&M FOOD AND WINE LTD (Company number 12361577) *Food Business Operator*
- at: Registered office address -
55-57 Wokingham Road, Reading, England, RG6 1LH *Address of Food Business Operator*

I have reasonable grounds for believing that you are failing to comply with the Hygiene Regulations because:

2. You have not taken all reasonable precautions to prevent food pests, (rats, mice, crawling insects and flying insects gaining entry into the stock room. This is to prevent the contamination of foodstuffs. *Officer to insert grounds for believing that the Hygiene Regulations are being breached*

In connection with your food business

- M&M Food and Wine *Name of Food Business*
- at: 55-57 Wokingham Road, Reading, England, RG6 1LH *Address of Food Business*

The matters which constitute your failure to comply are

- See **Part A** of the **Schedule** which forms part of this Hygiene Improvement Notice. *Insert provision(s) of the Hygiene Regulations breached and why*

3. In my opinion, the following measure(s) are needed for you to comply with the Hygiene Regulations:

See **Part B** of the **Schedule** which forms part of this Hygiene Improvement Notice

4. The measure or measures that will achieve the same effect **must be taken by:**

DAY: **7th** MONTH: **November** YEAR: **2022**

5. **IT IS AN OFFENCE NOT TO COMPLY WITH THIS HYGIENE IMPROVEMENT NOTICE BY THE DATE STATED.**

Signed: 
(Authorised Officer)

Name: Alison Shaw

Date: 12/10/22

Address: Public Protection (Food Safety)
Civic Offices, Reading
RG1 2LU

Telephone 0118 9372921 (direct line)

Email: alison.shaw@reading.gov.uk

Please read the notes overleaf carefully.

If you are not sure of your rights or the implications of this notice, you may want to seek legal advice.

Hygiene Improvement Notice

NOTES

1. In the opinion of the authorised officer, you are not complying with the Hygiene Regulations as described in paragraph 2 of the notice. The work needed in the officer's opinion to put matters right is described and it must be finished by the date set.
2. You are responsible for ensuring that the work is carried out within the period specified, which must be at least 14 days from the date of the notice.
3. You have a right to carry out work that will achieve the same effect as that described in the notice. If you think that there is another equally effective way of complying with the law, you should first discuss it with the officer.

YOUR RIGHT OF APPEAL

4. In accordance with Regulation 22 of the Food Safety & Hygiene (England) Regulations 2013, if you disagree with all or part of this notice, you can appeal to the Magistrates' Court. You must appeal within one calendar month of the date of the notice or the period ending with the date stated in paragraph 4 of the notice, whichever ends earlier.
5. If you decide to appeal, the time set out in the notice is suspended and you do not have to carry out the work described until the appeal is heard. However, if you are not complying with the Regulations mentioned in the notice, you may still be prosecuted for failure to comply with those Regulations.
6. When the appeal is heard, the Magistrates' Court may confirm, cancel or vary the notice.

WARNING

FAILURE TO COMPLY WITH THIS NOTICE IS A CRIMINAL OFFENCE

Offenders are liable to be fined and/or imprisoned for up to 2 years.

Reading Magistrates' Court
Civic Centre
Castle St
Reading
RG1 7TQ

**The Food Safety and Hygiene (England) Regulations 2013 –
Regulation 6**

HYGIENE IMPROVEMENT NOTICE – SCHEDULE

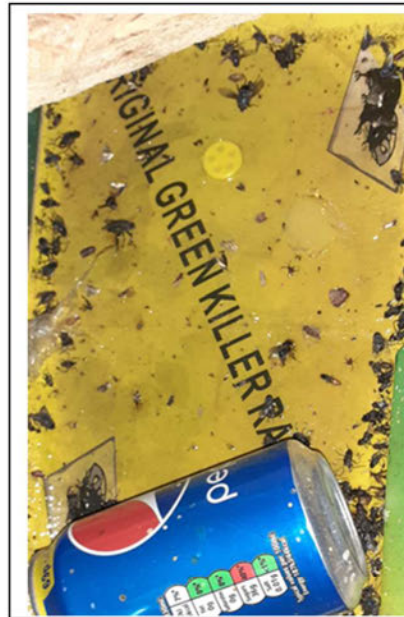
Part A – The following matters, noted during an inspection on 10/10/22, which constitute your failure to comply are:

The black steel doors in the stock room have a gap around the frame that would allow pests to enter. There is a gap at the bottom of the doors where they meet. There is a hole in the wall near the ceiling above the metal doors – see photos below.

This is in contravention of *Annex II (Chapter I, para.2(c))* of Regulation (EC) No. 853/2004 on the Hygiene of Foodstuffs and hence is a failure to comply with Article 4(2) of that Regulation.

Part B – In my opinion, the following measure(s) are needed for you to comply with the Hygiene Regulations:

Any gaps and holes to external doors, must be covered; any holes in walls must be filled with a solid, durable material in order to minimise pest entry points into food storage areas.



Clearly flying insects have in the past gained entry and infested the stock room.

Advisory note (not forming part of this notice). Do not use spray expandable foam for holes in walls, rodents eat through it. Ask your pest controller for advice on methods of pest proofing. Clear away old dead pest bodies.

Appendix B – Hygiene Improvement Notice served on 24 May 2026

PR202511-1174436

The Food Safety & Hygiene (England) Regulations 2013 – Regulation 6

HYGIENE IMPROVEMENT NOTICE

1. To: Dilander Food and Wine Limited *Food Business Operator*

at: 55-57 Wokingham Road, Reading, RG6 1LH *Address of Food Business Operator*

I have reasonable grounds for believing that you are failing to comply with the Hygiene Regulations because:

2. Following a Food Hygiene Inspection on the 21st July 2025, it was brought to your attention that the construction of the food premises does not permit good food hygiene practices, including protection against contamination, in particular, pest control. Further to which there is no evidence of adequate procedures to prevent pest access to areas where food is stored. Revisits on 10th December 2025 and 21st April 2026 saw no improvement in these matters.

In connection with your food business

M and M Food and Wine *Name of Food Business*

at: 55-57 Wokingham Road, Reading, RG6 1LH *Address of Food Business*

The matters which constitute your failure to comply are

See Part A of the Schedule which forms part of this Hygiene Improvement Notice.

3. In my opinion, the following measure(s) are needed for you to comply with the Hygiene Regulations:

See Part B of the Schedule which forms part of this Hygiene Improvement Notice.

4. The measure or measures that will achieve the same effect must be taken by:

24th May 2026

5. IT IS AN OFFENCE NOT TO COMPLY WITH THIS HYGIENE IMPROVEMENT NOTICE BY THE DATE STATED.

Signed

Name (IN CAPITALS): KATIE HEATH

Date: 23rd April 2026

Address: Food & Safety Team
Public Protection
Civic Offices, Bridge Street,
Reading RG1 2LU

Telephone(directline) 07976 166259
Switchboard 0118 937 37 37

E-mail: {{Record.Owner.Email}}

Please read the notes overleaf carefully.

If you are not sure of your rights or the implications of this notice, you may want to seek legal advice.

Hygiene Improvement Notice

NOTES

1. In the opinion of the authorised officer you are not complying with the Hygiene Regulations as described in paragraph 2 of the notice. The work needed in the officer's opinion to put matters right is described and it must be finished by the date set.
2. You are responsible for ensuring that the work is carried out within the period specified, which must be at least 14 days from the date of the notice.
3. You have a right to carry out work that will achieve the same effect as that described in the notice. If you think that there is another equally effective way of complying with the law, you should first discuss it with the officer.

YOUR RIGHT OF APPEAL

4. In accordance with Regulation 22 of the Food Safety & Hygiene (England) Regulations 2013, if you disagree with all or part of this notice, you can appeal to the Magistrates' Court. You must appeal within one calendar month of the date of the notice or the period ending with the date stated in paragraph 4 of the notice, whichever ends earlier.
5. If you decide to appeal, the time set out in the notice is suspended and you do not have to carry out the work described until the appeal is heard. However, if you are not complying with the Regulations mentioned in the notice, you may still be prosecuted for failure to comply with those Regulations.
6. When the appeal is heard, the Magistrates' Court may confirm, cancel or vary the notice.

WARNING

FAILURE TO COMPLY WITH THIS NOTICE IS AN OFFENCE

Offenders are liable to be fined and/or imprisoned for up to 2 years.

Reading Magistrates' Court Civic Centre Castle Street Reading RG1 7TQ
--

PR202511-1174436

The Food Safety and Hygiene (England) Regulations 2013 –
Regulation 6

HYGIENE IMPROVEMENT NOTICE SCHEDULE

Part A – The following matters, noted during an inspection on 10th December 2025 and the 21st April 2026, which constitute your failure to comply are:

The rear storage room is dirty and contains food debris and outside contaminants making it difficult to monitor for evidence of pests. In general, the shop floor and storage room ceilings were in poor repair and had various holes and gaps through which rodents/pests could gain access.

It also appears that no daily checks of the premise have been carried out by yourself or members of staff. The last pest report on 03/03/2026 stated that rat activity was noted in the ceiling and that you must close the holes in the ceiling to prevent entry. The report also stated that you must keep a diary. There is no evidence that this has been completed, and various holes and gaps were noted across the ceiling panels on the shop floor through which rodents could gain access.

The various gaps at the bottom of and around the rear door frame at the back of the storage room may provide a point of access for pests into your premise. Additionally, in the storage room there was two open drains missing the drain covers and beside the wash hand basin and directly into a food storage area. The open drain cavities may permit pests access into the premises.

This is in contravention of Annex II, Chapter I, Paragraph 2(c) and Annex II, Chapter IX, Paragraph 4 of Regulation (EC) No. 853/2004 on the Hygiene of Foodstuffs. This is contrary to Regulation 19(1) of the Food Safety & Hygiene (England) Regulations 2013.

Part B – In my opinion, the following measure(s) are needed for you to comply with the Hygiene Regulations:

Food Business must take all reasonable precautions to prevent food pests, namely rodents, cockroaches and flying insects from gaining entry into food storage areas. This is to prevent the contamination of foodstuffs.

You must pest proof the premises to prevent pest access, the areas which require particular attention are:

- The shop floor ceiling panels
- The casing around pipes and wires of the shop floor ceiling
- Underneath and around the rear door in the storage room
- The ceiling and high-level wall panels in the storage room
- Both drains by the Wash Hand Basin in the rear storage room
- The external drain covers outside the rear door and in the rear service yard
- The waste bins must both be fitted with a secure lid

You must carry out regular thorough checks of the premises for evidence of pests, report any signs of pests to the pest control company and keep a record of these checks on the premises.

Systematically examine food storage areas for potential rodent access points and activity.

Take all reasonable steps to prevent rodents accessing the shop floor and food storage areas and carry out appropriate pest control treatments to bring the current rodent activity under control.

Appendix C – Health and Safety at Work Prohibition Notices served on 8 June 2026

Reading Borough Council
Working better with you

Reference No: NOU
Number From database
PR202606-1274867

Health and Safety at Work etc. Act 1974, Section 22, 23 and 24

PROHIBITION NOTICE

To: **D.I. Ander Food and Wine Ltd** Employer's Name
at: **55-57 Wokingham Road** Employer's Address
Trading as: **M and M Food & Wine** Company Name
as: **Louise Colledge** Full Name of Officer
I am a **Senior Environmental Health Officer** Job Title

Of Environmental Health (Food & Safety), Reading Borough Council, Reading, RG1 2LU, Tel 0118 937 email: consumerprotection@reading.gov.uk hereby give you notice that I am of the opinion that the following activities
namely: **unsafe electrics to the rear store, in particular the light switch which has exposed live wires and is wet due to water leaks** Details of contravention

which are being carried on ~~"/likely to be carried on"~~ (delete as appropriate)
by you ~~"/under your control"~~ (*delete as appropriate)

at **M and M Food & Wine** Address of premises
55-57 Wokingham Road or place of activity

Involve ~~"/or will involve"~~ a risk of serious personal injury, and that the matters which give rise ~~"/will give rise"~~ (*delete as appropriate) to the said risks are:
Risk of electrocution and therefore serious personal injury - unsafe electrics with exposed wires and water leaking on light switch What gives rise to the likelihood of hazard

I am further of the opinion that the said matters involve ~~"/will involve"~~ a contravention of the following statutory provisions:
Health and Safety at work etc Act 1974 Legislation incl
Section 22d Section/Reg

because **Risk of electrocution due to live wires and water. Poorly mounted electric switch. This switch must not be used and N°26 on fuse board not reinstated** Reason for risk of injury

and I hereby direct that the said activities shall not be carried on by you or under your control immediately ~~"/"~~ (*delete as appropriate)

after **8th June 2026** Date

unless the said contraventions and matters have been remedied, I further direct that the measures specified in the schedule which forms part of the notice shall be taken to remedy the said contraventions. ~~"/"~~ (*delete as appropriate)

Officer Signature:  Date: **08/06/26**
being an Inspector appointed by an instrument in writing made pursuant to Section 19, Health and Safety at Work etc. Act 1974, and is entitled to issue this notice.

A Prohibition notice is also being served on:
 Name & Address

relating to the matters contained in this notice.

This is a relevant notice for the purposes of the Environment and Safety Information Act 1988. **Yes** (*delete as appropriate - is not relevant if affects work force only). If yes, this page only will form the register entry.

Officer Signature:  Date: **8/06/26**

Please read the notes overleaf carefully. If you are not sure of your rights or the implications of this notice, you may wish to seek legal advice.



Reference No: NOU
Number From database

PR202606-1274877

Health and Safety at Work etc. Act 1974, Section 22, 23 and 24

PROHIBITION NOTICE

To:	Dil Ander Food and Wine Ltd	Employer's Name
at:	55-57 Wokingham Road	Employer's Address
Trading as:	M and M Food & Wine	Company Name
I	Louise Colledge	Full Name of Officer
a	Senior Environmental Health Officer	Job Title

Of Environmental Health (Food & Safety), Reading Borough Council, Reading, RG1 2LU, Tel 0118 937 email: consumerprotection@reading.gov.uk hereby give you notice that I am of the opinion that the following activities namely:-

Unsafe electricals in rear store, in particular electrical cables that has been split in two	Details of contravention
--	--------------------------

which are being carried on ~~*/likely to be carried on*~~ (delete as appropriate)
by you ~~*/under your control*~~ (*delete as appropriate)

at	M and M Food & Wine 55-57 Wokingham Road	Address of premises or place of activity
----	---	--

Involve ~~*/or will involve*~~ a risk of serious personal injury, and that the matters which give rise ~~*/will give rise*~~ (*delete as appropriate) to the said risks are:

Risk and electrocution and electrical fire resulting in serious personal injury from unsafe splitting of a single electrical cable	What gives rise to the likelihood of hazard
--	---

I am further of the opinion that the said matters involve ~~*/will involve*~~ a contravention of the following statutory provisions:

Health and Safety at Work etc Act 1974 Section 2(2)(d)	Legislation incl Section/Reg
---	------------------------------

because

There is a risk of electrocution and electrical fire due to unsafe wiring. These cables must not be used and No 29 on the fuse box must not be reinstated.	Reason for risk of injury
--	---------------------------

and I hereby direct that the said activities shall not be carried on by you or under your control immediately ~~*/~~ (*delete as appropriate)

after	8 June 2026	Date
-------	-------------	------

unless the said contraventions and matters have been remedied. I further direct that the measures specified in the schedule which forms part of the notice shall be taken to remedy the said contraventions. (*delete as appropriate)

Officer Signature: Date: 08/06/26
being an inspector appointed by an instrument in writing made pursuant to Section 19, Health and Safety at Work etc. Act 1974, and is entitled to issue this notice.
A Prohibition notice is also being served on:

	Name & Address
--	----------------

relating to the matters contained in this notice.

This is a relevant notice for the purposes of the Environment and Safety Information Act 1988. Yes/No* (*delete as appropriate - is not relevant if affects work force only). If yes, this page only will form the register entry.

Officer Signature: Date: 08/06/26

Please read the notes overleaf carefully. If you are not sure of your rights or the implications of this notice, you may wish to seek legal advice.

Legislation covered by Inspection: Food Safety & Hygiene (England) Regulations 2013 ☐ Food Safety Act 1990 (as amended) ☐ Health & Safety at Work etc. Act 1974 ☐ Other legislation.....☐

Reason for Visit: Proactive ☐ Reactive ☐ Advisory ☐ Sample Taken (detailed below) ☐ Revisit ☐

Name of Premises..... Business Type.....

Address.....

Name of Food Business Operator/Dutyholder.....

Registered Office Address.....

Person Seen..... Position.....

Email..... Tel/mobile.....

Business days & hours..... Areas Checked.....

List of Documents checked ✓ = Yes x = Not available \ = not applicable Written FSMS ☐ Cleaning Log ☐

FH Training Policy / records ☐ Fridge/Freezer Temperature Log ☐ Hot Food Temperature Log ☐ Pest Control ☐

Health and Safety: Policy ☐ Risk Assessments ☐ (Details.....)

Comments: Matters Arising (L = Legal Requirement + Timescale and R = Recommendation) (Food Only: S = Structure, FH = Food Hygiene/Practices, CIM = Confidence in Management; FStd: Food Standards; H&S: Health & Safety)

L/R	S/FH/CIM	FStd/H&S	Comments
			A revisit was made today to check progress with 2 x Prohibition Notices served on 8/6/26. I found that the fire alarm had been turned on although the lights are not being used. You have now breached the Prohibition Notice ref. PR202206-1274864 which may lead to prosecution. You must comply with both notices and do not reinstate the fire switches or use the electronics as specified in the prohibition notices - I will report this on 8/6/26. I also note today that there are still pest entry points to the premises which means you are also committing an offence under food safety legislation.

Action Proposed: Inspection report form left ☐ Letter to follow ☐ Formal notices(s) ☐ Revisit ☐

Food Hygiene Rating Criteria Assessed	SCORE						Your Premises Rating is
Compliance with food safety procedures	0	5	10	15	20	25	
Compliance with structural requirements	0	5	10	15	20	25	
Confidence in management / control procedures	0	5	10		20	30	

Business Reply Expected: e-mail officer with your plan of action to address requirements Yes ☐ No ☐

Officer Name..... Signature..... Designation.....

2nd Officer Name..... Signature..... Designation.....

Date & Time.....am/pm. Telephone No: 0118 937..... Date of Next Visit.....

As the person seen at the visit, I have taken note and understand all aspects of work discussed with the Inspecting Officer OR I have received this form and I will ensure this inspection report form is passed to the Manager.

Name..... Signed..... Job Title.....

Note: This report describes those matters requiring attention. The report only covers the areas inspected at the time of the visit. Any queries about this report or you do not agree with your food rating, please contact the officer named above in the first instance. If it is not resolved then write to the Licensing, Food & Safety Manager at: Environmental Health (Food & Safety), Reading Borough Council, Civic Offices, Bridge Street, Reading. RG1 2LU or email: consumerprotection@reading.gov.uk

CONTINUATION SHEET

Name of Premises MandM Food & Wine Address 55-57. Wokingham Rd.

COMMENTS Matters Arising (L= Legal Requirement + Timescale R= Recommendations)

(FOOD HYGIENE ONLY: CIM=confidence in management, FH=food hygiene & safety practices, S=structure)

FStd: Food Standards; H&S: Health & Safety

L/R	CIM/S FH/ FStd H&S	
L	CIM	You must register- as a food business you can do this on our website: Reading Borough Council. You must register in the name of your trading address. T: immediate/ ongoing.
L	CIM	You must complete the outstanding sections of your Food Safety Management System. This includes staff training and maintaining up to date temperature monitoring checks. T: immediately
L	FH	Through the store and rear storage food (including drinks) were stored on the floor. You must raise all food stuffs off the floor and store in a way as to prevent pest and contamination risks. immediately ongoing I will write to you regarding the outstanding actions and the next steps.

Action Proposed: See Sheet One

Name of Officer Nantha Prudhena Signature [Signature] Date & Time 21/4/26 2:35pm

I have taken note and understand all aspects of work discussed with the Inspecting Officer

Name [Signature] Signed [Signature] Job Title

Note: This report only covers the areas inspected at the time of the visit and is an informal indication of areas of the business requiring attention. If you have any queries regarding this report, please contact the officer named above in the first instance. If it is not resolved then write to: Food & Safety or Trading Standards, Reading Borough Council, Civic Offices, Reading RG1 2LU or email: consumerprotection@reading.gov.uk

We collect personal information to help us provide a service to you. We will not share your information with third parties for marketing purposes or any other reason unless required to do so by law. For more information explaining how we protect and use your information please see our privacy notice at www.reading.gov.uk/dataprotection



Working date with you

Legislation covered by inspection: Food Safety & Hygiene (England) Regulations 2013 ☐ Food Safety Act 1990 (as amended) ☒ Health & Safety at Work etc. Act 1974 ☐ Other legislation ☐

Reason for Visit: Proactive ☐ Reactive ☐ Advisory ☐ Sample Taken (detailed below) ☐ Revisit ☐

Name of Premises: M&M Food and Wine Business Type: Convenience Store

Address: 55-57 Wokingham Road, RG0 2LH

Name of Food Business Operator/Dutypoder: Dell Archer food and wine Limate

Registered Office address: As above

Person Seen: Mammet Singh Position: Dutypoder

Email: [Redacted] Tel/mobile: [Redacted]

Business days & hours: [Redacted] Areas Checked: 21.5

List of Documents checked ✓ = Yes x = Not available \ = not applicable Written FSMS ☒ Cleaning Log ☒
FH Training Policy /records ☐ Fridge/Freezer Temperature Log ☒ Hot Food Temperature Log ☐ Pest Control ☐
Health and Safety: Policy ☐ Risk Assessments ☐ Details ☐

Comments: Matters Arising (L = Legal Requirement + Timescale and R = Recommendation) (Food Only: S-Structure, FH = Food Hygiene/Practices, CIM=Confidence in Management; FSId: Food Standards; H&S: Health & Safety) L/R: S/FH/CIM

FSId/H&S

Food Hygiene Revisit.

During today's inspection I have assessed the actid's from the last inspection.

Some structural arrangement have been made to the front portion of the premises however the structural holes and points of pest ingress remain present during the visit rats were active in the shop floor in particular, above the shelving on the far right wall. Timescale 2 weeks

L S You must repair the holes to the shelving on the shop floor in particular, above the shelving on the far right wall. Timescale 2 weeks

L S You must repair the molding around the rear door to prevent pest ingress. Timescale 2 weeks

Action Proposed: Inspection report form left ☒ Letter to follow ☐ Formal notices(s) ☐ Revisit ☐

Food Hygiene Rating Criteria Assessed	Good	SCORE					Poor	Your Premises Rating is
Compliance with food safety procedures	0	5	10	15	20	25		<u>no</u>
Compliance with structural requirements	0	5	10	15	20	25		
Confidence in management /control procedures	0	5	10	20	30			<u>change</u>

Business Reply Expected: e-mail officer with your plan of action to address requirements Yes ☒ No ☐

Officer Name: Martha Pruderie Signature: [Signature] Designation: FSO

2nd Officer Name: Susan Kan Signature: [Signature] Designation: SEHO

Date & Time: 21.04.26 2.35 am Telephone No: 07.54.73.3361 Date of Next Visit: Revisit

As the person seen at the visit, I have taken note and understand all aspects of work discussed with the inspecting Officer OR I have received this form and I will ensure this inspection report form is passed to the Manager/Owner.

Name: M&MCT Signed: [Signature] Job Title: [Redacted]

Note: This report describes those matters requiring attention. The report only covers the areas inspected at the time of the visit. If you have any queries about this report or you do not agree with your food rating, please contact the officer named above in the first instance. If it is not resolved then write to the Food & Safety Lead Officer at: Food & Safety, Reading Borough Council, Civic Offices, Bridge Street, Reading, RG1 2LU or email: consumerprotection@reading.gov.uk or visit www.reading.gov.uk.



To: Licensing, Reading Borough Council

From: Trading Standards, Reading Borough Council

TS Ref: PR202606-1277089

Premises: M&M Food & Wine, 55-57 Wokingham Road, Reading, RG6 1LH

Date: 20 July 2026

OBJECTION

Trading Standards Representations Objecting to:

- Applicant / Proposed Premises Licence Holder: Kulwant Singh Gaba
- Proposed Designated Premises Supervisor: Kulwant Singh Gaba

SUMMARY OF TRADING STANDARDS POSITION

Reading Trading Standards, as a responsible authority under the Licensing Act 2003, submits the reasons for objection on behalf of the Licensing Authority.

The grounds for these representations are in relation to the licensing objectives of Prevention of Crime and Disorder and Public Safety and made with regard to-

- (1) The non- suitability of the proposed Premises Licence Holder and DPS in light of historical non- compliance.
- (2) Concerns regarding the confidence in the business management and limited understanding of regulatory and legal obligations.
- (3) The serious risk that the grant of the licence would undermine the licensing objective of the prevention of crime and disorder.

EVIDENCE & MATTERS RELIED UPON

(1) History of non-compliance

Mr Gaba has a documented record of failing to comply with laws and regulations designed to protect the public:

(a) 2010: Mr Gaba and Metro Food and Wine Limited were prosecuted by Slough Trading Standards in relation to possession of counterfeit alcohol for offences under Consumer Protection Regulations.

Mr. Gaba was ordered to pay £125 cost and £15 Victim Surcharge, and the business was charged for - 1 offence under the Food Safety Act and 3 offences under the Consumer protection Regulations £50 fine on each (Total £200)-ordered to pay £125 cost and £15 victim surcharge.

(b) 2014: Mr Kulwant Singh Gabba as the Director and Premises Licence Holder of Metro Food and Wine (Slough) Limited was subject to legal proceedings by Slough Trading Standards for possession of illegal tobacco (150 packs).

Slough Trading Standards mentions that it was the second such occasion that Mr Gaba has been subject of possession of illegal products.

Slough Trading Standards considered the matter sufficiently serious to support a premises licence review application.

(2) Recent Compliance concerns

April 2026: During a food safety standards routine inspection, a significant quantity of foreign labelled food products was identified with labelling issues. Advice sheets and verbal advice was provided for improvements and to address the concerns with a timeline of 1 Month.

June 2026- Revisit demonstrated ongoing regulatory issues, including:

- Expired foods offered for sale.
- Unsafe toys being supplied.
- Failure to fully implement advice provided during previous visits.

During the re-visit, Mr Gaba questioned officers' interventions and appeared not to understand the purpose or necessity of our inspection activities, making it difficult to explain our regulatory role and the importance of compliance.

These findings help establish a pattern of non-compliance rather than isolated incidents.

CONCLUSION

Trading Standards is concerned that granting a Premises Licence to Mr Gaba would undermine the licensing objective of the prevention of crime and disorder.

Mr Gaba has previously been associated with enforcement action by a partner Trading Standards involving counterfeit alcohol and illegal tobacco products. These are serious

offences which involve unlawful trading activities and demonstrate previous failures to comply with legislation designed to protect consumers and legitimate businesses.

In addition to the historical matters, recent inspections in 2026 identified significant non-compliance across multiple regulatory areas, including food standards and product safety requirements. Despite advice and a reasonable period being provided to rectify the issues identified, significant breaches remained at the follow-up visit.

The role of both the Premises Licence Holder and Designated Premises Supervisor requires a clear understanding of legal responsibilities and a commitment to ensuring compliance with statutory requirements. The evidence outlined above gives Trading Standards little confidence that the applicant is capable of consistently promoting and upholding the licensing objectives without ongoing regulatory intervention.

Accordingly, Trading Standards considers there is a real risk that the grant of the licence would undermine the licensing objective of the prevention of crime and disorder and therefore objects to the application.

END