



Zaf'ron, North Road, Brighton - Further to Evidence

Date of Submission: 03rd September 2025

GBH Investigation update:

Since the initial review was submitted, one of the males arrested on the night of the offence, 02nd August 2025 has been released with no further action being taken against them. The other two males remain on police bail under investigation. An additional male was [REDACTED]. He has been interviewed and now on police bail under investigation.

Prior to the licensing hearing, we will conduct a full review of everything submitted and confirm to the local authority areas that we feel it's appropriate to conducted in private, excluding press and public. We will do our utmost to keep this to a minimum whilst ensuring a fair outcome for all involved by not jeopardising a live investigation.

We are expecting to submit further evidence that we will refer to at the hearing. We will ensure, if this is the case, to get this submitted in plenty of time prior to the hearing so that all parties have time to review it.

Comments relating to representation letter submitted to the local authority on 22nd August 2025 by Norulah Habibi, Zaf'ron:

There has been a clear change in Norulah Habibi's outlook regarding the actions [REDACTED] that led to this review being called by Sussex Police.

Key points we wish to bring to the panel's attention:

[REDACTED]

- Norulah HABIBI states they cooperated fully with the police investigation which is not factually true. Mr HABIBI himself confirmed that he withheld providing CCTV to the investigating officers and that admission backs up the attending officers suspicion of this.
- He acknowledges the unacceptable way that police and medical assistance was not called for by staff.
- Regarding the CCTV time stamp, he confirms that the CCTV was incorrect regarding this, but it was corrected following a licensing inspection in January 2025. But during the investigation of the incident on 02nd August 2025 it confirms that the CCTV time stamp was still incorrect, and a breach was issued.
- Alleged drug use. Sussex Polcie have not said that the venue was being used for the consumption of drugs.
- Regarding security, the condition on the licence states they should always have SIA on duty at the venue when it is opening beyond midnight. The statement within the documentation we are referring



to leads us to believe this condition has not been adhered to. Further down in the document it mentions that SIA is no longer an informal or ad-hoc practice, it should not have been in the first place.

- In early 2025 they have put steps in to address the noise complaints however the police have continued to receive complaints linked to this venue.
- Just like the comment around drugs, unsure where the allegation of “Repeated Offender” refers to from Police. We have made no such comments in our review document.
- BCRP - Norulah HABIBI states that soon after having the licence granted, they joined the BCRP. The BCRP is a requirement under the licence conditions. The licence was granted on 29th August 2024 and following an inspection by us in January 2025 where membership had not been arranged, it was confirmed by BCRP on 27th January 2025 they had eventually joined. We would argue that 5 months is not considered as “soon after” and we believe the membership was only taken up following our inspection in January.

The proposed closure of 01:00:

Although we acknowledge this would reduce some of the public nuisance risks, we still have concern over the current and previous management of the venue and their ability to promote the licensing objectives. Much has been promised in the documentation submitted but the majority of this should have been in place already. Some of it confirms further licence breaches and goes against what Norulah HABIBI has stated in the past where originally, he was taking no responsibility [REDACTED] on that night. There is also the serious matter of withholding / delaying providing evidence namely CCTV.

Timeline of dealings with the venue.

17th November 2023 – 23:49:

Venue attended by police and a colleague from Brighton & Hove City Council Licensing as noticed venue was open and we had knowledge that there was no premises licence in place. Premises now trading as Zaf'ron after being taken over mid-Summer 2023. When entering we witnessed food out ready to cook, orders coming in on delivery apps and 2 customers waiting for food they had ordered. 4 staff members on site. Asked to talk to the owner who made himself known. He confirmed he was aware he had no premises licence, but it was a busy night, and they had not noticed the time. He made out this was the first time this had happened. We then pointed out the printed food menus on the counter which advertised opening hours of until Midnight. This opening time was also displayed on the Just Eat app, Google and on their Facebook page. We asked a local business if they had seen the venue open beyond 23:00 previously and they confirmed they had and themselves ordered food after 23:00. A warning letter dated 21st November 2023 was emailed on that date at 13:29 for conducting unlicensed activities – Late Night Refreshments. We note that at this time the director was Ahmed Nasser and it was emailed to himself and Norulah Habibi as advised both individuals were joint owners.



27th November 2023 – 16:27:

Ahmed Nasserri emailed police to ask about applying for a Late-Night Refreshment Licence. We gave advice around the Statement of Licensing policy and that we would look for the application to be heard before a licensing panel.

05th December 2023:

Check of online sites to ensure closing times had been updated further to our visit of 17th November 2023 and found that neither Facebook, Google nor Just Eat had been updated.

23rd December 2023 – 23:05:

Venue attended by police and found around 6 customers inside the venue seated and eating. Premises lights all on. As soon as officers entered the staff went to turn the lights off and promoted their customers to pay. Attending officers felt this only occurred due to their attendance. The owner advised officers that he was going to apply for a licence as delivery forms a large part of their business late at night. This adds further evidence that venue has been possibly operating beyond 23:00 for them to know it's worth opening later.

07th February 2024:

Check of online sites to ensure closing times had been updated further to our visit of 17th November 2023 found that both Facebook and Just Eat still had not been updated.

18th June 2024

New premises licence application submitted by Rafiullah Khan, company director. Police submitted a representation against this application on the grounds of crime & disorder associated with late night venues and additionally, public nuisance around the negative impact a late-night venue in a residential area could have.

Hearing was held on 20th August 2024 via Teams with the result made public on 29th August 2024. The application was granted by the licensing panel. Conditions applied were limited so Sussex Police submitted an appeal to have more robust conditions put on.

03rd August 2024 Brighton & Hove Pride Weekend – 23:50:

Venue attended by police and on approaching staff hurriedly ran to close the shop insisting they had closed already. Officers noticed that food could be seen being cooked on the grill and sign on the door indicating they were still open. A warning letter dated 08th August 2024 was emailed on that same date at 13:13 for conducting unlicensed activities – Late Night Refreshments. This was sent to Rafiullah Khan, company director at the time. Although they had applied for a licence, the hearing for it had not taken place so at this time, no licence was in operation.



29th August 2024:

New licence granted and can be operated under permitting Late Night Refreshments until 03:00 every day. From 23:00 this is for takeaway and delivery only.

15th September 2024 – 06:12:

Call in to police advising that the venue is attracting large amounts of people especially at the weekends causing a lot of noise including shouting, swearing and playing loud music.

09th January 2025 – 15:52:

Joint visit with Brighton & Hove City Council Licensing to conduct a full licensing inspection since the grant of a new Late Night Refreshments Licence. On arrival they met with Rafiullah KHAN who asked if this was regarding the recent noise complaint. He was advised no but we were there to conduct a licensing inspection. The inspection flagged up several areas of non-compliance and a breach was issued and emailed to Rafiullah KHAN on 10th January 2025 at 16:38:

- CCTV – storing for 30 days instead of 31 days.
- SIA Door staff – they have one on duty at the required times but unsure what company they are from.
- SIA Risk Assessment – unable to produce one.
- MUS Contract – contract not in place.
- BCRP Membership – was not a member.
- Incident log – no incident log in place.
- Ensure delivery vehicles parked legally – At time of visit moped parked outside on double yellow lines.
- Leave quietly notices – none on display.
- Staff training including conflict management – no training conducted or able to evidence.

27th March 2025 – 09:30:

One of the Neighbourhood PCSO's approached Licensing about noise complaints they are receiving regarding Zaf'ron, North Road. Advised them to direct these to Brighton & Hove City Council Environmental Protection Department to follow up.

09th April 2025

Report to police around noise issues linked to vehicles coming and going at this premises in the early hours.

02nd June 2025 – 23:34:

Call in to police around noise issues coming from the premises. Premises was having building work and at the time of the call the call handler could hear the noise over the phone.

03rd June 2025 – 05:45:

Off duty Licensing officer was walking along North Road Brighton and was distracted by loud building work type of noise which was odd for this time of the morning. Noticed it was coming from Zaf'ron.



21st June 2025 – 01:26:

Noise complaint to police regarding groups outside Zaf'ron, slamming car doors and generally being loud.

13th July 2025 – 23:44:

Ongoing noise issues reported to police involving large groups of taxi drivers and moped riders hanging around outside Zaf'ron at night causing noise. Complainant has also reported this to Brighton & Hove City Council.

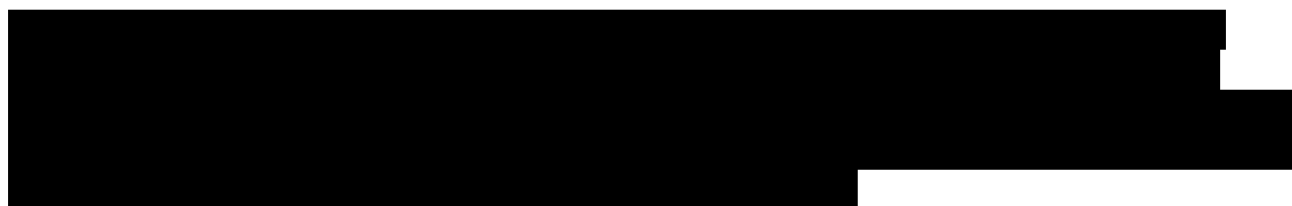
01st August 2025 – 02:28:

Please refer to the initial review documentation.

02nd August 2025 – 03:30:

Please refer to the initial review documentation.

05th August 2025 – 09:58:



During one of the hearings on 11th August 2025, it is noted that when discussions were being had with Norula HABIBI, the company director, around CCTV. He confirmed that he gave officers untrue information regarding having CCTV and or if the CCTV was working. Confirming the officer's suspicions, as set out in detail within the initial review documentation, that he was not being truthful.

13th August 2025 – 13:41:

Sussex Police applied for a Premises Licence Review of Zaf'ron, 99 Noth Road, Brighton. This was validated by the local authority on the same day at 15:55.

18th August 2025:

Following the hearing of 11th August 2025, it came to light that the licence holder, Norula HABIBI was in breach of his premises licence regarding CCTV. A breach was issued and emailed to him on 18th August 2025 at 12:26.



Directorship of Zaf'ron Ltd – Company Number 14238128

Premises Licence Holder of Zaf'ron, 99 North Road, Brighton

15th July 2022 Zaf'ron Limited incorporated
15th July 2022 Faisal BABOUKARKHEL appointed as a director
15th July 2022 Mustafa UMARI appointed as a director
02nd Sept 2022 Faisal BABOUKARKHEL resigned as a director
02nd Sept 2022 Mustafa UMARI resigned as a director
02nd Sept 2022 Norula HABIBI appointed as a director
02nd Sept 2022 Mohammad BABAK appointed as a director
10th Jan 2023 Mohammad BABAK resigned as a director
27th Feb 2023 Faisal BABOUKARKHEL appointed as a director
19th Mar 2023 Faisal BABOUKARKHEL resigned as a director
19th Mar 2023 Mohammad BABAK appointed as a director
17th May 2023 Faisal BABOUKARKHEL resigned as a director
25th Aug 2023 Ahmed NASSERI appointed as a director
12th Jan 2024 Ahmed NASSERI resigned as a director
22nd Jan 2024 Norula HABIBI resigned as a director
22nd Jan 2024 Rafiullah KHAN appointed as a director
06th Mar 2024 Mohammad AMINI appointed as a director
15th Mar 2024 Mohammad AMINI resigned as a director
01st Feb 2025 Rafiullah KHAN resigned as a director
01st Feb 2025 Norulah HABIBI appointed director

Directorship of Zafron Crawley Ltd – Company Number 15437053

Listed company under food registration wit Crawley Borough Council.

23rd January 2024 Zafron Crawley Ltd incorporated
23rd January 2024 Rafiullah Habibi appointed as a director
21st March 2025 Rafiullah Habibi resigned as a director
21st March 2025 Norulah Habibi appointed as a director