

Representation Letter – Premises Licence Review (Zaf’ron, 99 North Road, Brighton)

Norulah Habibi (Premises Licence Holder)
Zaf’ron, 99 North Road Brighton,
BN1 1YE

22 August 2025

Licensing Panel Brighton & Hove City Council
Bartholomew House,
Bartholomew Square Brighton,
BN1 1JP

Dear Licensing Panel,

I am writing to formally respond to the premises licence review application submitted by Sussex Police in relation to Zaf’ron, 99 North Road, Brighton. I understand that this review has been requested on the grounds of the **prevention of crime and disorder**, following a serious incident at my premises on 2 August 2025, as well as other concerns raised by Sussex Police and the Council. I appreciate the opportunity to make this representation, and I do so with a genuine commitment to address all allegations, take responsibility where appropriate, and outline the proactive measures I have implemented to promote the licensing objectives.

Response to Specific Allegations

Firstly, I wish to address each of the specific **allegations raised by Sussex Police and the Licensing Authority**, providing our perspective and, where applicable, our acceptance of mistakes:

- [REDACTED]
- [REDACTED]
- [REDACTED]

[REDACTED]

■ [REDACTED]

■ [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

■ [REDACTED]

[REDACTED]

- **Delivery Driver Complaints (Parking and Noise):**

We have received and acknowledge complaints regarding **nuisance caused by delivery drivers** picking up orders late at night – issues such as motorcycles

being parked on double yellow lines, engines revving, or drivers congregating and talking loudly outside. I understand how this behaviour can disturb neighbours, and I apologize that it was not pre-emptively controlled. As soon as this issue was brought to our attention (earlier in 2025), I took proactive steps to **mitigate the impact of delivery pickups**: I **contacted all the delivery platforms** we use (Uber Eats, Just Eat, Deliveroo) to formally notify them of the complaints and to ask for their cooperation in instructing their drivers to be respectful of our street and neighbours. We specifically requested that drivers **do not park illegally or inconsiderately**, and that they **refrain from making noise (no horn honking, loud music, or shouting)** when collecting orders. We have also **implemented our own in-house rules**: staff now advise every driver upon arrival to use appropriate parking (there is a loading bay around the corner that can be used legally) and to **turn off their engines** while waiting. We've created a designated waiting area just inside our entrance for drivers, so they don't need to linger out on the pavement. In addition, I have put up **clear signage** asking delivery couriers to be quiet and mindful of residents. If any particular driver is observed flouting their employer (the delivery service) so that the issue is documented. These efforts have **significantly improved the conduct of delivery pickups** at Zaf'ron. We will continue to be vigilant on this front – our goal is that our takeaway service remains as **unobtrusive as possible** to the neighbourhood.

- **Cleaning is done quietly and earlier**: We now begin wind-down operations well before 3am. No loud cleaning tasks (such as moving bins) occur after 11pm if possible. Any cleaning that must be done after closing is handled at a low volume – staff are instructed to **speak softly**, avoid any banging of equipment, and close doors gently.
- **Waste is stored indoors until morning**: Instead of dragging garbage bags or bins out to the street at 3am, we now **hold all waste inside the premises overnight** (securely stored) and only put refuse out at a reasonable morning hour on the day of collection. This ensures there is **no disruptive rubbish removal noise** during the night.

- **No music or shouting:** We ensure any background music in the shop is turned off well before midnight, and certainly no music plays after hours. Staff do not loiter outside chatting after work; they are reminded to depart quietly and respect that this is a mixed commercial/residential street. Since implementing these changes, we have not received further complaints about noise or waste disturbances from our immediate neighbours. I am committed to maintaining these practices permanently so that Zaf'ron **creates no public nuisance**, especially at closing time.
- **Waste Disposal and Late-Night Noise Complaints:** Some residents have raised concerns about **noise late at night**, including the clatter of disposing rubbish or general disturbance from our cleaning up at closing time. I apologize for any noise we inadvertently caused during our late-night closing routine. In response, we have **modified our procedures to minimize noise**:
- **Allegation of a “Repeated Offender” Returning on Multiple Nights:** There was an implication that a particular troublesome individual (or “repeat offender”) issues. I want to clarify that **we do not knowingly allow anyone who has caused serious trouble to return** to Zaf'ron. If an individual was involved in a violent incident or egregious misconduct at our venue, they would be **barred from the premises**. We keep an internal record (and now an incident log book) of problematic patrons. To my knowledge, the person(s) involved in the August 2nd incident have **not returned to the venue since** – certainly not with our permission. If the police are referring to a different incident or person, I would need more detail, but I can assure the Panel that **any person identified as a cause of disorder is unwelcome at Zaf'ron going forward**. Our new security protocols, including membership in the local Barred Persons scheme (through BCRP radio) and diligent door supervision, will help us **identify and refuse entry to any known troublemakers**. We take this very seriously: one of the reasons we are increasing our collaboration with the Brighton Crime Reduction Partnership is specifically to stay informed about individuals with a history of causing issues in the area. In summary, we have **no tolerance for repeat offenders**, and if someone has been involved in criminal or violent behaviour

at Zaf'ron, they will not be allowed back in. Should any such individual attempt to return, our staff (and security) will immediately turn them away and alert the police if necessary.

Remedial Actions and Proactive Measures

In light of the above issues, I want to reassure the Panel that Zaf'ron's management has not waited for this hearing to make improvements. We have already implemented a range of **remedial actions** and are committing to further **proactive measures** to ensure full compliance and promote the licensing objectives. Below I detail the concrete steps taken and planned:

- **Engagement of a Professional Licensing Consultant:** I have **appointed an experienced business/licensing consultant** to advise our management team. This consultant specializes in late-night hospitality compliance and has been guiding us on best practices. With their help, we have improved our record-keeping, reviewed all licence conditions in detail, and instituted better internal checks to ensure nothing is overlooked. This external expertise is Essentially, we now have a **competent professional monitoring our compliance** and offering ongoing advice on how to run a safer, fully compliant late-night operation.
- **Contract with Pagoda Security (SIA Door Supervisors):** We have entered into a regular full time **contract with Pagoda Security Services**, a reputable local security company, to provide **SIA-licensed door supervisors** for Zaf'ron for late night operation. This means that on every night we are open past midnight, **a dedicated, trained security guard will be on duty at the premises** from 00:00 until closing (in addition to myself when I am present). Pagoda Security will typically station a guard at our door during the key late hours, especially on weekends when nighttime activity is busiest. This contractual arrangement eliminates any uncertainty over security staffing – it is no longer just an informal or ad-hoc practice, but a guaranteed provision. Having a professional door supervisor on site will greatly **enhance our ability to prevent and manage disorder**.

Staff Training and Incident Logging: I have prioritized raising the skill and awareness level of all our staff when it comes to safety, conflict management, and

compliance. **Every team member at Zaf'ron is undergoing additional training**, with an emphasis on: **Conflict Management & De-escalation:** Through sessions arranged in coordination with Pagoda Security (and other accredited trainers), our staff will be taught on how to calmly defuse tense situations and handle difficult customers without resorting to force. This includes scenario-based training on dealing with aggression, recognizing when to call for backup, and techniques to protect themselves and others while minimizing harm.

- **Joining the Brighton Crime Reduction Partnership (BCRP):** Soon after the license was granted, We **enrolled in the Brighton & Hove Business Crime Reduction Partnership BCRP**, obtaining a “NightSafe” radio handset for communication with police and other venues (fulfilling the partnership membership condition). This is a program that connects late-night businesses like ours with the police and each other. Through BCRP, we will have access to the citywide radio network and information-sharing about any individuals who are known to cause trouble around town.

- **Emergency Procedures:** We have retrained everyone on the correct response to emergencies – whether it’s a fight, a medical issue, or any **calling 999 immediately** is a priority in serious incidents, as discussed earlier. We’ve even conducted internal drills so that staff can practice what to do in case of violence, fire, or other emergencies. They now have a clear chain of command to report issues upward to me or the senior person on duty without delay.

- **Record-Keeping and Incident Log:** We have introduced a new **Incident Log Book** kept on the premises at all times. Staff have been instructed to record any notable incidents (no matter how minor they may seem) in this log such as refusals of service, arguments, ejections, complaints, or any time we call police. I review this log personally each week and sign off on it monthly to ensure it’s being used diligently. This log will be available for inspection by authorities at any time. It serves both as a compliance tool and a way for us to spot patterns and continually improve. By maintaining a detailed incident log, we promote transparency and accountability in our day-to-day operations.

- **Upgraded CCTV System (Maintenance and Accuracy):** We have invested in **upgrading our CCTV** to ensure it is fully reliable as a safety and evidential tool. The system now has **high-definition cameras** covering all key areas of the restaurant (including the dining area, kitchen, entrance, and the immediate pavement outside). The **timestamp is accurate** and synchronized with atomic time – as mentioned, I check it weekly – and the DVR stores at least **31 days of footage** in compliance with our licence conditions. I have posted signage alerting customers and passers-by that **CCTV is in operation for their safety and security**. Equally important, I have made sure **multiple staff members are trained to operate the system** (live monitoring, playback, and exporting footage) so that if police or council officers ever need evidence, we can provide it without any delay. Essentially, our CCTV is now a robust part of our crime prevention and public safety strategy, and it will be kept continuously well-maintained. This directly addresses the previous issues we had with the system's timestamp and staff knowledge those are fully resolved.

- **Collaboration with Delivery Platforms (Driver Conduct):** As noted earlier, we took immediate action to mitigate **delivery driver nuisance**. Beyond the an open line of communication with these companies. If a particular driver repeatedly ignores our requests for quiet and lawful conduct, I will report that driver through the platform and request they not be assigned to our restaurant. We've found the delivery companies receptive to such feedback because it aligns with their own policies. Additionally, I have established a **designated pickup spot inside the premises** to draw drivers off the street, and we strive to have orders ready promptly, so drivers do not linger outside unnecessarily. These measures have been effective; there's been a noticeable reduction in noise and congestion out front. We will continue to **coordinate with the delivery services and enforce courteous driver behaviour** so that our takeaway operation does not create public nuisance.

- **Noise Control and Neighbourhood Respect:** To further the **Prevention of Public Nuisance** objective, we have instilled a mindset in our team that we must be **excellent neighbours**. Concretely, in addition to the quiet cleaning and waste procedures already detailed, we've made a few other adjustments. We make sure that as we approach closing time, the environment in and around the shop is calm and

quiet. Lights are dimmed, any remaining staff or drivers are reminded to be silent outside.

I will **personally reached out to neighbouring residents and businesses** to open lines of communication. I will deliver letters with my personal mobile number and email, encouraging neighbours to contact me directly if they have any concerns or if any disturbance is noticed coming from Zaf'ron. My commitment is to **address any issue immediately** whether it means apologizing and rectifying a mistake or direct engagement, I believe, helps build trust that we truly care about our impact on the community.

All of these measures are either already in place or actively underway, demonstrating my determination to correct past issues and run a responsible, well-controlled establishment. I believe they directly **strengthen our compliance with all licensing objectives** and go above and beyond the basic requirements.

Community Contribution: Beyond our statutory duties, I want to emphasize that Zaf'ron strives to be a **positive force in the community**. We have a practice of providing food and hot tea/coffee to late-night delivery drivers and taxi drivers in our area who often have limited options at late hours. This not only supports those workers but also encourages them to behave respectfully around our premises (as they appreciate our hospitality). During the past year, we also **participated in feeding homeless individuals** in Brighton for example, we prepared and donated meals during a community outreach event last winter, and we plan to continue these charitable efforts on a regular basis. We are a small family-run business, and being part of the Brighton community means a great deal to us. We are committed to giving back and being a responsible neighbour on North Road. I hope this context shows that Zaf'ron is not just another late-night outlet, but a community-minded business that adds value to the local area.

Conclusion

I would like to **formally propose a voluntary reduction in our terminal hour from 03:00 to 01:00** (for dine-in, takeaway, and delivery) as a sincere demonstration of our commitment to remedying problems and promoting the licensing objectives. This earlier closing time, I believe, is a reasonable and proportionate step to address concerns, especially given that a nearby establishment (the REDACTED on North Road) is licensed to serve alcohol until 01:00; our proposal would bring Zaf'ron's hours into line with the local precedent and community expectations. Operating until 01:00 is essential to our viability. We feel that a 1am closing time is a balanced solution that **addresses residents' concerns and Police/licensing objectives**, while still allowing us to serve late-night customers up to a point. We are a small independent business and the sales between 23:00 and 01:00 allow us to cover rent, staff wages, and other fixed costs. Without these hours, the business may not survive. I believe this compromise both protects the community and sustains local employment. but we recognize that operating under the right conditions and with respect for our neighbours is paramount. We are prepared to make this sacrifice of trading hours in order to demonstrate our commitment to change and to ensure that Zaf'ron does not contribute to late-night disorder.

I deeply apologize for the incidents and lapses that led to this review, and I am determined to **provide clarity, context, and corrective actions** so that the Panel can be confident in our ability to operate responsibly moving forward. My aim is not to deflect blame, but to show that we have **listened to the feedback from the authorities and our community** and have acted decisively to rectify every issue within our control. I am confident that with the robust measures now in place strengthened security, better-trained staff, improved procedures, and shorter hours Zaf'ron can continue to trade in a manner that **upholds the licensing objectives** of Prevention of Crime and Disorder, Public Safety, Prevention of Public Nuisance. We have been a part of the North Laine community for some time and we genuinely wish to be **seen as a positive presence**, not a source of problems. I humbly ask the Panel to consider the extensive steps we have taken and our willingness to compromise (by reducing hours) as evidence of our determination to turn things around and be fully compliant.

Thank you for your time and consideration. I am, of course, **willing to accept additional conditions** or recommendations the Panel sees fit to impose, and I will ensure they are implemented in full. I will also be present at the review hearing to answer any questions.

Yours sincerely,

Norulah Habibi

Premises Licence Holder, Zaf'ron (99 North Road, Brighton)



Brighton & Hove Business Forum Ltd Brighton

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John Street Brighton BN2 0LA

01273 321117

accounts@businessforumbrighton.co.uk

Invoice

Zafron Zaf'ron Ltd 99 North Road Brighton BN1 1YE United Kingdom	Invoice Number: 37503 Invoice Date: 28/05/2025 Due Date: 29/05/2025 Account: DMZAFRON BRANCH: Zafron
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Zaf'ron – Policies for Licensing Compliance

Conflict Management Policy

At Zaf'ron, the safety of staff, customers, and the wider community is paramount. We maintain a strict zero-tolerance approach towards violence, aggression, abuse, or discrimination.

1. Staff Training – All staff are trained in de-escalation techniques, conflict awareness, and the importance of calling 999 at the first sign of violence or serious threat. Refresher training is undertaken regularly, and records are kept.
2. Calling Police – In any violent or threatening incident, the first action must be to call the police (999). A panic alarm system is being considered to speed up this process.
3. Role of Door Supervisor – A licensed SIA Door Supervisor is on duty nightly from 23:00 until closing. They manage entry, monitor behaviour, and intervene when necessary. The Door Supervisor's details (name, SIA number, times on duty) are recorded in the log.
4. Incident Recording – All incidents are logged in the Incident Book, including details of what happened, who was involved, and any police attendance. CCTV footage is saved and backed up for each incident.
5. Staff Conduct – Staff must avoid physical engagement unless absolutely necessary to protect themselves or others. Any excessive use of force is not tolerated. All staff are reminded that their role is to de-escalate and call for assistance.

This policy is reviewed every six months to ensure best practice.

Dispersal Policy

Zaf'ron is committed to ensuring that customers leave the premises quietly and

without causing nuisance to neighbours.

1. Closing Routine – From 00:30 lights are gradually raised and customers are reminded politely that the premises will close at 01:00. Last orders are served in time to allow an orderly closure.
2. Door Supervisor Role – The Door Supervisor monitors the exit to ensure customers leave quietly, do not loiter, and respect neighbours. Any antisocial behaviour outside the premises is dealt with promptly.
3. Staff Instructions – Staff remind customers to disperse quietly, avoid shouting, and not to linger outside the restaurant.
4. Delivery Drivers – Drivers are instructed to wait inside the premises for orders, to turn off engines, and avoid loud conversations or use of horns.
5. Noise and Waste – Cleaning and waste disposal is carried out quietly inside after closing. Refuse is not taken out after 22:00; instead, it is stored indoors and disposed of in the morning.
6. Neighbour Engagement – Neighbours are provided with management contact details to raise concerns directly. All complaints are logged and addressed promptly.

This policy will be kept under review and updated as required to ensure it meets licensing objectives and community expectations.