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LICENSING SUB-COMMITTEE

Tuesday, 9 July 2019 at 10.30 am
Council Chamber, Civic Centre, Silver Street,
Enfield, EN1 3XA

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Councillors : Chris Bond (Chair), Derek Levy and Jim Steven

AGENDA – PART 1

1. WELCOME AND APOLOGIES FOR ABSENCE

2. DECLARATION OF INTERESTS

Members are asked to declare any disclosable pecuniary, other pecuniary or non pecuniary interests relating to items on the agenda.

3. MERIDIAN WATER, UNIT 4-6B ORBITAL BUSINESS PARK, 5 ARGON ROAD, EDMONTON, N18 3BW (REPORT NO.58) (Pages 1 - 132)

Application for a New Premises Licence – Broadwick Venues Ltd, Events Application.

4. EXCLUSION OF THE PRESS AND PUBLIC

If necessary, to consider passing a resolution under Section 100A(4) of the Local Government Act 1972 excluding the press and public from the meeting for any items of business moved to part 2 of the agenda on the grounds that they involve the likely disclosure of exempt information as defined in those paragraphs of Part 1 of Schedule 12A to the Act (as amended by the Local Government (Access to Information) (Variation) Order 2006).
(There is no part 2 agenda)

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MUNICIPAL YEAR 2019/20 REPORT NO.58

COMMITTEE:
Licensing Sub-Committee
9 July 2019

REPORT OF:
Principal Licensing Officer

LEGISLATION:
Licensing Act 2003

Agenda – Part1	Item
<p>SUBJECT: Application for a New Premises Licence – Broadwick Venues Ltd, Events Application</p> <p>PREMISES: Meridian Water, Unit 4-6B Orbital Business Park, 5 Argon Road, Edmonton, N18 3BW</p> <p>WARD: Upper Edmonton</p>	

1. LICENSING HISTORY:

- 1.1 The premises are situated in the area known as Meridian Water and consists of warehouses in the Orbital Business Park, referred to as The Drumsheds.
- 1.2 The Drumsheds and land to the south of The Drumsheds (referred to as the IKEA clear site) were granted a premises licence (reference number LN/201000086&LN/201900088) on 17 May 2019, following a new premises licence application. The applicant was Broadwick Venues Limited, and the application was known as the “Festival Application” and the hearing took place on 8 May 2019, as the application was subject to representations from Responsible Authorities and Other Persons.
- 1.3 The full licensing agenda, report, decision notice and minutes for the Festival Application are available online: [8 May 2019](#).
- 1.4 The Council’s Socio-Economic Lead Meridian Water Team has provided an overview of the Meridian Water project which is produced in Annex 1.
- 1.5 Local area maps are produced in Annex 2. The entrance to the land backs on to Leaside Road, the north side of the road is in Enfield, the south side is Haringey.

2. THIS APPLICATION:

- 2.1 On 15 March 2019 two applications were made by Broadwick Venues Limited, for two new Premises Licence as follows:
- A. The Festival Application (reference numbers WK/218074578 and WK/218074598) for Meridian Water, Unit 4-6B Orbital Business Park, and Land to the south of Units 4-6B, Orbital Business Park, 5 Argon Road, Edmonton, N18 3BW.
- B. The Events Application (reference number WK/218074640) for Meridian Water, Unit 4-6B Orbital Business Park, Orbital Business Park, 5 Argon Road, Edmonton, N18 3BW.

2.2 This report relates to the 'Events Application' only.

2.3 According to Companies House (check carried out on 06/06/2019), the Company Directors of Broadwick Venues Limited are listed as: Simon Tracey, Simeon Aldred, Ian Buckley, Ian Hanson, Darren Singer and Bradley Thompson.

2.4 The proposed Designated Premises Supervisor (DPS) is Mr Simeon Aldred.

2.5 The application seeks:

2.5.1 The premises to provide a multi-function event space for a mixture of corporate events, product launches, formal dinners, food and beer festivals, live music and DJ led music events.

2.5.2 The premises licence to be unlimited.

2.5.3 The maximum capacity will not exceed 9,999.

2.5.4 The application seeks the following licensable activities:

Licensable Activity	Timings (daily)*	Indoors	Outdoors	Both
Plays	08:00 to 06:00			x
Films	08:00 to 06:00			x
Indoor Sporting Events	08:00 to 06:00	x		
Boxing or wrestling entertainments	08:00 to 06:00			x
Live music (indoors)	08:00 to 06:00	x		
Live music (outdoors)	09:00 to 22:30		x	
Recorded music (indoors)	08:00 to 06:00	x		
Recorded music (outdoors)	09:00 to 22:30		x	
Performance of dance	08:00 to 06:00			x
Anything else of a similar description	08:00 to 06:00			x
Late night refreshment	23:00 to 05:00			x
Supply of Alcohol	08:00 to 06:00			x
Hours premises are open to the public	08:00 to 06:00			x

*All activities are subject to non-standard timings as follows:

That at the start of British Summertime the terminal hour for all licensable activities shall be extended by one hour.

That on New Year's Eve licensable activities shall also be permitted between the end of the hours permitted for licensable activities on New Year's Eve to the start of the hours permitted for licensable activities on New Year's Day.

2.6 Each of the Responsible Authorities were consulted in respect of the application.

2.7 A copy of the application and the original plan is attached as Annex 3 and Annex 4 respectively.

- 2.8 Broadwick Venues Limited is linked to The Printworks London, Surrey Quays Road, London, SE16 7PJ (London Borough of Southwark), and the premises licence holder is Xcite Campaign Management Limited.
- 2.9 The London Borough of Southwark Licensing Team have reported that no review action or other enforcement action has been taken against the premises licence holders for breaches of licensing or health and safety law.

3. RELEVANT REPRESENTATIONS:

3.1 All parties making representations against the Festival Application were issued an IP reference. For continuity, those same reference numbers have been applied again to those making representations against the Events Application. Please note that IP8 is not relevant to this application – the London Borough of Haringey Licensing Authority objected to the Festival Application only.

3.2 Responsible Authorities:

3.2.1 **The Metropolitan Police** made representation against the application on the grounds of prevention of crime and disorder; prevention of public nuisance and public safety. This representation will be referred to as IP2 and produced in Annex 5.

3.2.2 **The London Fire Brigade** made representation against the application on the grounds of public safety. This representation will be referred to as IP4 and produced in Annex 6.

3.3 **Other Persons:** Representations have been made, against the application, by five parties. The representations will be produced as and referred to as follows:

IP1 – Resident A, Chingford – Annex 7

IP3 - Tottenham Hotspur Football & Athletic Co Ltd – Annex 8 to 9 (this includes the representation from the previous application. Appendices in relation to Field Day Festival licence application have been excluded)

IP5 – Resident B, Edmonton – Annex 10

IP6 - Enfield's Safety Advisory Group (SAG) – Annex 11

IP8 – Resident C, Chingford – Annex 12

3.4 The grounds of these representations include the prevention of crime & disorder; the prevention of public nuisance, public safety and protection of children from harm.

3.5 Additional information is expected from some of the Responsible Authorities and Other Persons, and also the Applicant. Broadwick Venues Limited used the Festival Licence on Friday 7 and Saturday 8 June 2019, for Field Day Festival. Debriefing sessions with the Responsible Authorities and other parties have taken place recently which may have some bearing on the representations for the Events Application. The outcome is not yet available at the time of publishing this report. A Supplementary Report will be circulated and published once received. This will also include the list of conditions.

4. SITE VISIT

- 4.1 The SAG Chair recommended that Members of the licensing sub-committee carry out a site visit, as it would be beneficial to view the actual site and area, due to the unusual layout of the site, event type and also the large capacity being sought in the application.
- 4.2 One site visit took place on Friday 26 April 2019 and the second will take place on Monday 8 July 2019, with the Members and Principal Licensing Officer only, and in accordance with the Site Visit Protocol.

5. RELEVANT LAW, GUIDANCE & POLICIES:

- 5.1 The paragraphs below are extracted from either:
 - 5.1.1 the Licensing Act 2003 ('Act'); or
 - 5.1.2 the Guidance issued by the Secretary of State to the Home Office of April 2017 ('Guid'); or
 - 5.1.3 the London Borough of Enfield's Licensing Policy Statement of January 2015 ('Pol').

General Principles:

- 5.2 The Licensing Sub-Committee must carry out its functions with a view to promoting the licensing objectives [Act s.4(1)].
- 5.3 The licensing objectives are:
 - 5.3.1 the prevention of crime and disorder;
 - 5.3.2 public safety;
 - 5.3.3 the prevention of public nuisance; &
 - 5.3.4 the protection of children from harm [Act s.4(2)].
- 5.4 In carrying out its functions, the Sub-Committee must also have regard to:
 - 5.4.1 the Council's licensing policy statement; &
 - 5.4.2 guidance issued by the Secretary of State [Act s.4(3)].

Significant Events:

- 5.5 The Council recommends that for significant events, a comprehensive risk assessment is undertaken by premises licence holders to ensure that matters related to the licensing objectives are identified and addressed. [Pol 14.1]

Hours:

- 5.6 The Sub-Committee decides licensed opening hours as part of the implementation of the licensing policy statement and is best placed to make decisions about appropriate opening hours in their area based on their local knowledge and in consultation with responsible authorities [Guid 10.13].

- 5.7 Stricter conditions with regard to licensing hours may be required for licensed premises situated in or immediately adjacent to residential areas to ensure that disturbance to local residents is avoided. This will particularly apply in circumstances where, having regard to the location, size and nature of the premises, it is likely that disturbance will be caused to residents in the vicinity of the premises by concentrations of people leaving, particularly during normal night-time sleeping periods [Pol s.8.4].

Cumulative Impact Policy

- 5.8 The premises is not situated in any of Enfield's Cumulative Impact Policy areas [Pol 9.20].

Public Space Protection Orders (PSPO)

5.9 Public Spaces Protection Orders (PSPOs) allow the council to work with the police to control antisocial behaviour in public places. A PSPO imposes prohibitions or restrictions in a public place to stop people committing antisocial behaviour. Breaking a PSPO is a criminal offence which can result in a Fixed Penalty Notice (FPN) of £100, or a fine of up to £1,000 if prosecuted. Since March 2018, several PSPOs were issued across Enfield, including control of alcohol consumption. The order relating to the control of alcohol consumption designates the whole borough of Enfield as the area to which it applies and states:

1. Person(s) within the designated area shall not consume alcohol, or anything which the authorised person reasonably believes to be alcohol, if requested to stop by an authorised person.
2. Exemptions shall apply in cases where the consumption of alcohol is on premises or public space licensed under the Licensing Act 2003, or where the consumption of alcohol is authorised by virtue of Part III of the London Local Authorities Act 1990 (tables and chairs licences).
3. Person(s) who breach this prohibition shall (with the exemption of the matters referred to in above) immediately surrender if requested in accordance with the requirements under section 63(2), alcohol, or anything which the authorised person reasonably believes to be alcohol, in his/her possession to an authorised person and the authorised person is thereafter authorised to dispose of any item under section 63(5) of the Act.

Advertisement of applications

- 7.10 The Licensing Authority is satisfied that the application was advertised in accordance with the requirements of the Licensing Act 2003.

Decision:

- 7.11 As a matter of practice, the Sub-Committee should seek to focus the hearing on the steps considered appropriate to promote the particular licensing objective or objectives that have given rise to the specific representation and avoid straying into undisputed areas [Guid 9.37].
- 7.12 In determining the application with a view to promoting the licensing objectives in the overall interests of the local community, the Sub-Committee must give appropriate weight to:
 - 7.12.1 the steps that are appropriate to promote the licensing objectives;
 - 7.12.2 the representations (including supporting information) presented by all the parties;
 - 7.12.3 the guidance; and
 - 7.12.4 its own statement of licensing policy [Guid 9.38].
- 7.13 Having heard all of the representations (from all parties) the Sub-Committee must take such steps as it considers appropriate for the promotion of the licensing objectives. The steps are:
 - 7.13.1 to grant the application subject to the mandatory conditions and such conditions as it considers necessary for the promotion of the licensing objectives;
 - 7.13.2 to exclude from the scope of the licence any of the licensable activities to which the application relates;
 - 7.13.3 to refuse to specify a person in the licence as the premises supervisor;
 - 7.13.4 to reject the application [Act s.18].

Background Papers:
None other than any identified within the report.

Contact Officer:
Ellie Green on 020 8379 8543

Annex 1

Meridian Water Project Overview

Meridian Water is a 20 year project which will bring 10,000 new homes and 6,000 new jobs to Enfield across an 85ha site including 55ha of developable land.

As with any scheme of this scale, one of the greatest challenges is to establish an approach to development which creates a sense of place from day one and doesn't leave residents and businesses who invest in the early phases of development from feeling like they are living or working on a building site for decades.

Part of that process is to bring forward meanwhile uses which animate the scheme by creating jobs and visitors onto sites which will almost certainly evolve in terms of their final use. These meanwhile uses are also important for a number of other reasons:

- They bring visitors to the area which is vital both in terms of raising the profile of Meridian Water but also in justifying early investment in transports infrastructure – the new Meridian Water station being a notable example in this instance.
- They keep sites secure from, for example, fly tipping. Meridian Water has suffered significantly from illegal fly tipping which is both expensive to remove and creates a negative image of the area for potential investors.
- They create opportunities, including jobs, for residents in surrounding areas, an essential part of realising integration between existing and new communities.
- They realise income to improve overall viability of the development.

The Council has identified the empty Orbital Business park sheds and IKEA clear site as a part of its meanwhile strategy. The site, at approximately 4 ha, and is one of the larger meanwhile opportunities across the development and could provide meanwhile uses that could benefit from both the cleared land and a number of large sheds with excellent ceiling heights.

The Council's decision to enter into discussion with Vibration Group was on the basis that their proposals meet all of the key aspirations set out above.

Cabinet supported the principle of progressing a proposal with Vibration Group in July 2018. In making its decision Cabinet considered that the industrial sheds would be converted into a major cultural and music venue in London celebrating music, film, art performance and theatre, complemented by music festivals and other outdoor content during the summer months – establishing Meridian Water as an exciting cultural destination. It was noted that this would make a major contribution

to the borough's cultural offer, establish a night time economy offer and significantly raise the profile of Meridian Water.

Cabinet also considered the track record of the operator – noting that the provider had demonstrated that carefully curated culture attracts footfall to an area, generates considerable PR and changes the perception of an area, all of which are key aspirations for Meridian Water.

The initial Field Day Festival, the first of what we anticipate being many events, was successful with the SAG feeding back that Field day had a compliant and pleasant crowd with a considerably low number of people using welfare facilities. The event went well and raised the profile of the Meridian Water with 25,000 people in attendance and the new transport infrastructure coped well with the train station being well used.

Simon Gardner
Socio- Economic Lead Meridian Water Team

Annex 2

Local Area Maps

Key for all three maps:

A – Broadwick Ltd

B – Tottenham Hotspurs, White Hart Lane Stadium

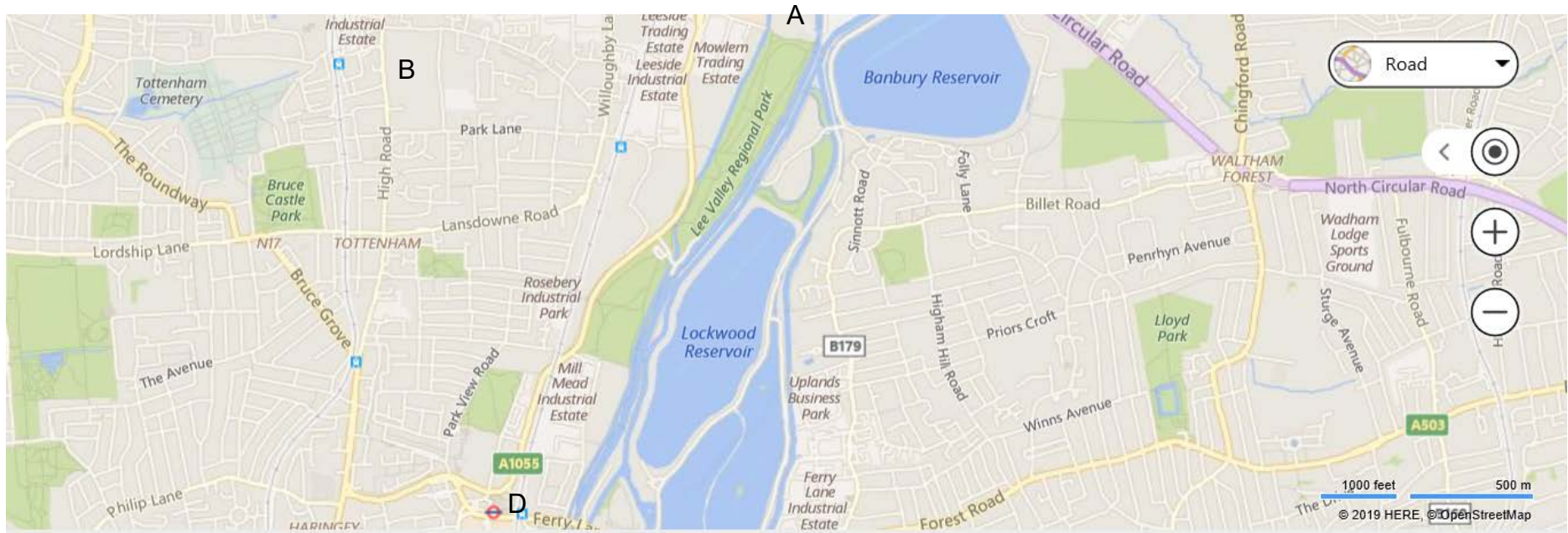
C – Meridian Water new station (overground)

D – Tottenham Hale station (overground and underground)

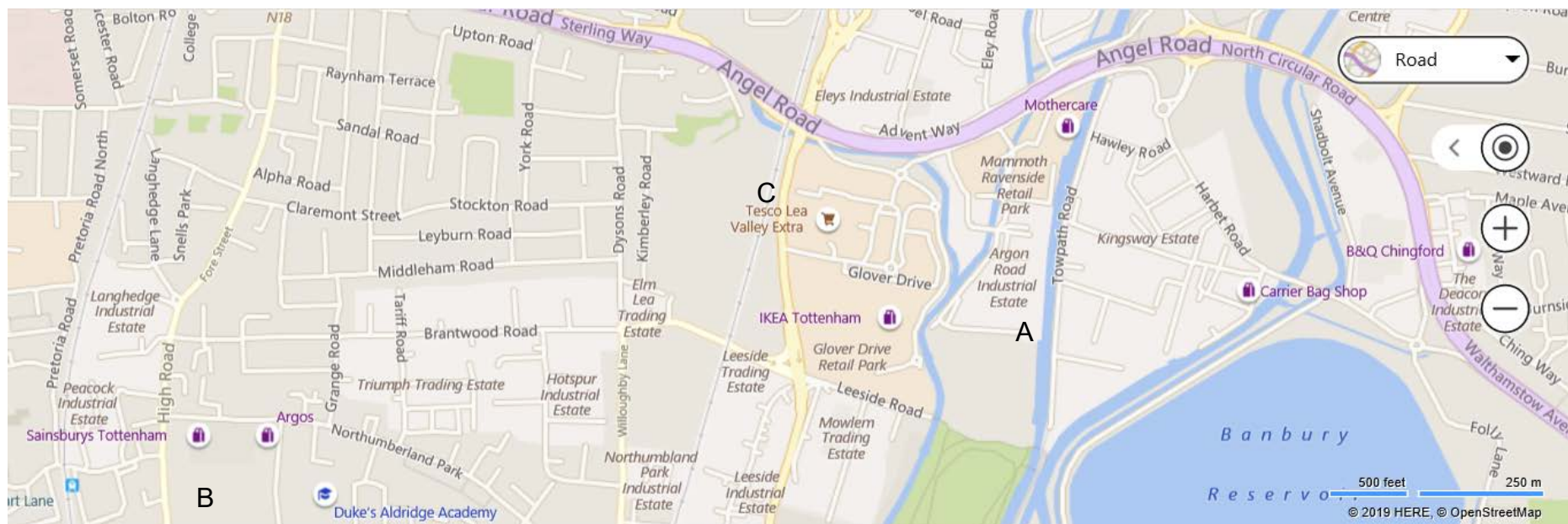
Map 1:



Map 2:



Map 3:



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London Borough of Enfield

**Application for a premises licence to be granted
under the Licensing Act 2003**

PLEASE READ THE FOLLOWING INSTRUCTIONS FIRST

Before completing this form please read the guidance notes at the end of the form. If you are completing this form by hand please write legibly in block capitals. In all cases ensure that your answers are inside the boxes and written in black ink. Use additional sheets if necessary.

You may wish to keep a copy of the completed form for your records.

I/We Broadwick Venues Limited

(Insert name(s) of applicant)

apply for a premises licence under section 17 of the Licensing Act 2003 for the premises described in Part 1 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

Part 1 – Premises Details

Postal address of premises or, if none, ordnance survey map reference or description			
Meridian Water Units 4, 5, 6, 6a&b Orbital Business Park 5 Argon Road Edmonton			
Post town	London	Postcode	N18 3BW
Telephone number at premises (if any)			
Non-domestic rateable value of premises		Not rated	

Part 2 - Applicant Details

Please state whether you are applying for a premises licence as

Please tick as appropriate

- | | | |
|---|-------------------------------------|-----------------------------|
| a) an individual or individuals * | <input type="checkbox"/> | please complete section (A) |
| b) a person other than an individual * | | |
| i. as a limited company | <input checked="" type="checkbox"/> | please complete section (B) |
| ii. as a partnership | <input type="checkbox"/> | please complete section (B) |
| iii. as an unincorporated association or | <input type="checkbox"/> | please complete section (B) |
| iv. other (for example a statutory corporation) | <input type="checkbox"/> | please complete section (B) |
| c) a recognised club | <input type="checkbox"/> | please complete section (B) |
| d) a charity | <input type="checkbox"/> | please complete section (B) |

- e) the proprietor of an educational establishment please complete section (B)
- f) a health service body please complete section (B)
- g) a person who is registered under Part 2 of the Care Standards Act 2000 (c14) in respect of an independent hospital in Wales please complete section (B)
- ga) a person who is registered under Chapter 2 of Part 1 of the Health and Social Care Act 2008 (within the meaning of that Part) in an independent hospital in England please complete section (B)
- h) the chief officer of police of a police force in England and Wales please complete section (B)

* If you are applying as a person described in (a) or (b) please confirm:

Please tick yes

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

(A) INDIVIDUAL APPLICANTS (fill in as applicable)

Mr <input type="checkbox"/>	Mrs <input type="checkbox"/>	Miss <input type="checkbox"/>	Ms <input type="checkbox"/>	Other Title (for example, Rev)	
Surname			First names		
I am 18 years old or over				<input type="checkbox"/> Please tick yes	
Current postal address if different from premises address					
Post town				Postcode	
Daytime contact telephone number					
E-mail address (optional)					

SECOND INDIVIDUAL APPLICANT (if applicable)

Mr <input type="checkbox"/>	Mrs <input type="checkbox"/>	Miss <input type="checkbox"/>	Ms <input type="checkbox"/>	Other Title (for example, Rev)	
Surname			First names		
I am 18 years old or over				<input type="checkbox"/>	Please tick yes
Current postal address if different from premises address					
Post town		Postcode			
Daytime contact telephone number					
E-mail address (optional)					

(B) OTHER APPLICANTS

Please provide name and registered address of applicant in full. Where appropriate please give any registered number. In the case of a partnership or other joint venture (other than a body corporate), please give the name and address of each party concerned.

Name Broadwick Venues Limited
Address 30 Leicester Square London WC2H 7LA
Registered number (where applicable) 10884920
Description of applicant (for example, partnership, company, unincorporated association etc.) Company
Telephone number (if any)
E-mail address (optional)

Part 3 Operating Schedule

When do you want the premises licence to start?

DD	MM	YYYY
A	S	A P

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

DD	MM	YYYY

Please give a general description of the premises (please read guidance note 1)

Multi-function event space for a mixture of corporate events, product launches, formal dinners, food and beer festivals, live music and DJ led music events.

Temporary stages, bars, toilets and seating to be in situ on an event by event basis. A detailed plan of each event will be provided to the responsible authorities.

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

9,999

What licensable activities do you intend to carry on from the premises?

(Please see sections 1 and 14 of the Licensing Act 2003 and Schedules 1 and 2 to the Licensing Act 2003)

Provision of regulated entertainment

Please tick any that apply

- a) plays (if ticking yes, fill in box A)
- b) films (if ticking yes, fill in box B)
- c) indoor sporting events (if ticking yes, fill in box C)
- d) boxing or wrestling entertainment (if ticking yes, fill in box D)
- e) live music (if ticking yes, fill in box E)
- f) recorded music (if ticking yes, fill in box F)
- g) performances of dance (if ticking yes, fill in box G)
- h) anything of a similar description to that falling within (e), (f) or (g) (if ticking yes, fill in box H)

Provision of late night refreshment (if ticking yes, fill in box I)

Supply of alcohol (if ticking yes, fill in box J)

In all cases complete boxes K, L and M

A

Plays Standard days and timings (please read guidance note 6)			<u>Will the performance of a play take place indoors or outdoors or both – please tick</u> (please read guidance note 2)	Indoors	<input type="checkbox"/>
Day	Start	Finish		Outdoors	<input type="checkbox"/>
Mon	08:00	06:00	<u>Please give further details here</u> (please read guidance note 3)	Both	<input checked="" type="checkbox"/>
Tue	08:00	06:00			
Wed	08:00	06:00	<u>State any seasonal variations for performing plays</u> (please read guidance note 4)		
Thur	08:00	06:00			
Fri	08:00	06:00	<u>Non standard timings. Where you intend to use the premises for the performance of plays at different times to those listed in the column on the left, please list</u> (please read guidance note 5)		
Sat	08:00	06:00			
Sun	08:00	06:00			

That at the start of British Summertime the terminal hour for all licensable activities shall be extended by one hour.

That on New Year's Eve licensable activities shall also be permitted between the end of the hours permitted for licensable activities on New Year's Eve to the start of the hours permitted for licensable activities on New Year's Day.

B

Films Standard days and timings (please read guidance note 6)			Will the exhibition of films take place indoors or outdoors or both – please tick (please read guidance note 2)	Indoors	<input type="checkbox"/>
Day	Start	Finish		Outdoors	<input type="checkbox"/>
				Both	<input checked="" type="checkbox"/>
Mon	08:00	06:00	Please give further details here (please read guidance note 3)		
Tue	08:00	06:00			
Wed	08:00	06:00	State any seasonal variations for the exhibition of films (please read guidance note 4)		
Thur	08:00	06:00			
Fri	08:00	06:00	Non standard timings. Where you intend to use the premises for the exhibition of films at different times to those listed in the column on the left, please list (please read guidance note 5)		
Sat	08:00	06:00	That at the start of British Summertime the terminal hour for all licensable activities shall be extended by one hour.		
Sun	08:00	06:00	That on New Year's Eve licensable activities shall also be permitted between the end of the hours permitted for licensable activities on New Year's Eve to the start of the hours permitted for licensable activities on New Year's Day.		

C

Indoor sporting events Standard days and timings (please read guidance note 6)			Please give further details (please read guidance note 3)
Day	Start	Finish	
Mon	08:00	06:00	
Tue	08:00	06:00	State any seasonal variations for indoor sporting events (please read guidance note 4)
Wed	08:00	06:00	
Thur	08:00	06:00	Non standard timings. Where you intend to use the premises for indoor sporting events at different times to those listed in the column on the left, please list (please read guidance note 5)
Fri	08:00	06:00	That at the start of British Summertime the terminal hour for all licensable activities shall be extended by one hour.
Sat	08:00	06:00	That on New Year's Eve licensable activities shall also be permitted between the end of the hours permitted for licensable activities on New Year's Eve to the start of the hours permitted for licensable activities on New Year's Day.
Sun	08:00	06:00	

D

Boxing or wrestling entertainments Standard days and timings (please read guidance note 6)			Will the boxing or wrestling entertainment take place indoors or outdoors or both – please tick (please read guidance note 2)	
Day	Start	Finish	Indoors	<input type="checkbox"/>
			Outdoors	<input type="checkbox"/>
			Both	<input checked="" type="checkbox"/>
Mon	08:00	06:00	Please give further details here (please read guidance note 3)	
Tue	08:00	06:00		
Wed	08:00	06:00	State any seasonal variations for boxing or wrestling entertainment (please read guidance note 4)	
Thur	08:00	06:00		
Fri	08:00	06:00	Non standard timings. Where you intend to use the premises for boxing	

			<p><u>or wrestling entertainment at different times to those listed in the column on the left, please list</u> (please read guidance note 5)</p> <p>That at the start of British Summertime the terminal hour for all licensable activities shall be extended by one hour.</p> <p>That on New Year's Eve licensable activities shall also be permitted between the end of the hours permitted for licensable activities on New Year's Eve to the start of the hours permitted for licensable activities on New Year's Day.</p>
Sat	08:00	06:00	
Sun	08:00	06:00	

E

Live music Standard days and timings (please read guidance note 6)			<u>Will the performance of live music take place indoors or outdoors or both – please tick</u> (please read guidance note 2)	Indoors	<input type="checkbox"/>			
			Times in bold are for outdoors.	Outdoors	<input type="checkbox"/>			
Day	Start	Finish		Both	<input checked="" type="checkbox"/>			
Mon	08:00	06:00						
	09:00	22:30						
Tue	08:00	06:00						
	09:00	22:30						
Wed	08:00	06:00				<u>State any seasonal variations for the performance of live music</u> (please read guidance note 4)		
	09:00	22:30						
Thur	08:00	06:00						
	09:00	22:30						
Fri	08:00	06:00				<u>Non standard timings. Where you intend to use the premises for the performance of live music at different times to those listed in the column on the left, please list</u> (please read guidance note 5)		
	09:00	22:30						
Sat	08:00	06:00				That at the start of British Summertime the terminal hour for all licensable activities shall be extended by one hour.		
	09:00	22:30						
Sun	08:00	06:00				That on New Year's Eve licensable activities shall also be permitted between the end of the hours permitted for licensable activities on New Year's Eve to the start of the hours permitted for licensable activities on New Year's Day.		
	09:00	22:30						

F

Recorded music Standard days and timings (please read guidance note 6)			Will the playing of recorded music take place <u>indoors or outdoors or both – please tick</u> (please read guidance note 2)	Indoors	<input type="checkbox"/>		
Day	Start	Finish		Outdoors	<input type="checkbox"/>		
			Times in bold are for outdoors.	Both	<input checked="" type="checkbox"/>		
Mon	08:00	06:00	09:00	22:30	Please give further details here (please read guidance note 3)		
Tue	08:00	06:00	09:00	22:30			
Wed	08:00	06:00	09:00	22:30		State any seasonal variations for the playing of recorded music (please read guidance note 4)	
Thur	08:00	06:00	09:00	22:30			
Fri	08:00	06:00	09:00	22:30			Non standard timings. Where you intend to use the premises for the playing of recorded music at different times to those listed in the column on the left, please list (please read guidance note 5)
Sat	08:00	06:00	09:00	22:30	That at the start of British Summertime the terminal hour for all licensable activities shall be extended by one hour.		
Sun	08:00	06:00	09:00	22:30	That on New Year's Eve licensable activities shall also be permitted between the end of the hours permitted for licensable activities on New Year's Eve to the start of the hours permitted for licensable activities on New Year's Day.		

G

Performances of dance Standard days and timings (please read guidance note 6)			Will the performance of dance take place <u>indoors or outdoors or both – please tick</u> (please read guidance note 2)	Indoors	<input type="checkbox"/>	
Day	Start	Finish		Outdoors	<input type="checkbox"/>	
				Both	<input checked="" type="checkbox"/>	
Mon	08:00	06:00			Please give further details here (please read guidance note 3)	
Tue	08:00	06:00				
Wed	08:00	06:00				State any seasonal variations for the performance of dance (please read guidance note 4)
Thur	08:00	06:00				

Fri	08:00	06:00	<p><u>Non standard timings. Where you intend to use the premises for the performance of dance at different times to those listed in the column on the left, please list</u> (please read guidance note 5)</p> <p>That at the start of British Summertime the terminal hour for all licensable activities shall be extended by one hour.</p> <p>That on New Year's Eve licensable activities shall also be permitted between the end of the hours permitted for licensable activities on New Year's Eve to the start of the hours permitted for licensable activities on New Year's Day.</p>
Sat	08:00	06:00	
Sun	08:00	06:00	

H

<p>Anything of a similar description to that falling within (e), (f) or (g) Standard days and timings (please read guidance note 6)</p>			<p>Please give a description of the type of entertainment you will be providing</p>		
Day	Start	Finish	<p><u>Will this entertainment take place indoors or outdoors or both – please tick</u> (please read guidance note 2)</p>	Indoors	<input type="checkbox"/>
Mon	08:00	06:00		Outdoors	<input type="checkbox"/>
				Both	<input checked="" type="checkbox"/>
Tue	08:00	06:00	<p><u>Please give further details here</u> (please read guidance note 3)</p>		
Wed	08:00	06:00			
Thur	08:00	06:00	<p><u>State any seasonal variations for entertainment of a similar description to that falling within (e), (f) or (g)</u> (please read guidance note 4)</p>		
Fri	08:00	06:00			
Sat	08:00	06:00	<p><u>Non standard timings. Where you intend to use the premises for the entertainment of a similar description to that falling within (e), (f) or (g) at different times to those listed in the column on the left, please list</u> (please read guidance note 5)</p>		
Sun	08:00	06:00	<p>That at the start of British Summertime the terminal hour for all licensable activities shall be extended by one hour.</p> <p>That on New Year's Eve licensable activities shall also be permitted between the end of the hours permitted for licensable activities on New Year's Eve to the start of the hours permitted for licensable activities on New Year's Day.</p>		

I

Late night refreshment Standard days and timings (please read guidance note 6)			Will the provision of late night refreshment take place indoors or outdoors or both – please tick (please read guidance note 2)	Indoors	<input type="checkbox"/>
				Outdoors	<input type="checkbox"/>
				Both	<input checked="" type="checkbox"/>
Day	Start	Finish	Please give further details here (please read guidance note 3)		
Mon	23:00	05:00			
Tue	23:00	05:00	State any seasonal variations for the provision of late night refreshment (please read guidance note 4)		
Wed	23:00	05:00			
Thur	23:00	05:00	Non standard timings. Where you intend to use the premises for the provision of late night refreshment at different times, to those listed in the column on the left, please list (please read guidance note 5)		
Fri	23:00	05:00			
Sat	23:00	05:00	That at the start of British Summertime the terminal hour for all licensable activities shall be extended by one hour.		
Sun	23:00	05:00			
			That on New Year's Eve licensable activities shall also be permitted between the end of the hours permitted for licensable activities on New Year's Eve to the start of the hours permitted for licensable activities on New Year's Day.		

J

Supply of alcohol Standard days and timings (please read guidance note 6)			Will the supply of alcohol be for consumption – please tick (please read guidance note 7)	On the premises	<input type="checkbox"/>
				Off the premises	<input type="checkbox"/>
				Both	<input checked="" type="checkbox"/>
Day	Start	Finish	State any seasonal variations for the supply of alcohol (please read guidance note 4)		
Mon	08:00	06:00			
Tue	08:00	06:00	Non standard timings. Where you intend to use the premises for the supply of alcohol at different times to those listed in the column on the left, please list (please read guidance note 5)		
Wed	08:00	06:00			
Thur	08:00	06:00			
Fri	08:00	06:00			

			That at the start of British Summertime the terminal hour for all licensable activities shall be extended by one hour.
Sat	08:00	06:00	
			That on New Year's Eve licensable activities shall also be permitted between the end of the hours permitted for licensable activities on New Year's Eve to the start of the hours permitted for licensable activities on New Year's Day.
Sun	08:00	06:00	

State the name and details of the individual whom you wish to specify on the licence as designated premises supervisor:

Name Simeon Aldred	
Date of Birth ■■■■■	
Address ■■■■■ ■■■■■	
Postcode	■■■■■
Personal licence number (if known) ■■■■■	
Issuing licensing authority (if known) Broxtowe Borough Council	

K

<p>Please highlight any adult entertainment or services, activities, other entertainment or matters ancillary to the use of the premises that may give rise to concern in respect of children (please read guidance note 8).</p> <p>N/A</p>
--

L

Hours premises are open to the public Standard days and timings (please read guidance note 6)			State any seasonal variations (please read guidance note 4)
Day	Start	Finish	
Mon	08:00	06:00	
Tue	08:00	06:00	
Wed	08:00	06:00	
Thur	08:00	06:00	
Fri	08:00	06:00	
Sat	08:00	06:00	
Sun	08:00	06:00	

Non standard timings. Where you intend the premises to be open to the public at different times from those listed in the column on the left, please list (please read guidance note 5)

That at the start of British Summertime the terminal hour for all licensable activities shall be extended by one hour.

That on New Year's Eve licensable activities shall also be permitted between the end of the hours permitted for licensable activities on New Year's Eve to the start of the hours permitted for licensable activities on New Year's Day.

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

a) General – all four licensing objectives (b, c, d and e) (please read guidance note 9)

1. For all events, the premise licence holder shall have in place documentation for the venue that will be reviewed prior to each event and updated and amended if required. These documents will detail action to be taken by staff, will be available for inspection by the licensing authority and will include:

- Venue Operational Plan;
- Traffic Management Plan;
- Security/Crowd Management Plan;
- Noise Management Plan;
- Risk Assessment(s);
- Drugs Policy;
- Medical Management Plan;
- Youth and Vulnerable Persons Policy
- Any other associated documentation.
- A plan showing these temporary non-fixed structures will be created and circulated as part of the operational plan for each event.

b) The prevention of crime and disorder

2. That all staff will be given training in relation to the Licensing Act 2003 and the following specific areas; Licensing Act 2003 objectives and awareness, management systems and processes to enforce the premises licence conditions, Challenge 25 and the responsible retail of alcohol, warning and eviction (guidelines and procedures), conflict management and maintaining all required records and registers.

3. That the maximum capacity of the premises is 9,999 persons for all DJ / music led nights and 9,999 patrons for all day time events and exhibitions.

4. That clearly legible signage shall be prominently displayed where it can easily be seen and read by customers at all exits / entrances at the premises and in all external areas of the premises requesting to the effect that customers leave the premises in a quiet and orderly manner with respect for local residents.

5. That a register will be maintained at the main entrance to the premises showing the names, addresses and up to date contact details including mobile phone contact numbers for the Licensee and other members of the management team who are on duty

6. That no alcohol will be brought in to the premises by any customers at any time.

7. That any event held at the premises will be risk assessed and a suitable and sufficient number of male and female door supervisors will be employed at the premises in accordance with the risk assessment. A search policy will be implemented in line with the risk assessment.

8. The Venue Manager will only permit the sale of alcohol for consumption off the premises where the

alcohol is a specialist product, e.g. wine sold as part of a food and drink festival or a gift in part of a corporate event. For events which are promotional events, sealed bottles of alcohol may be part of a gift for people attending the event and customers will be allowed to leave with those sealed containers. This will be enforced by security confiscating open vessels on exit points.

9. The crowd management plan dealing with the dispersal and egress of guests will be in operation for every event held at the premise, details of this can be found in the operational plan.

10. That promotional literature and tickets will contain information regarding transport options and shall request that persons leave the area quietly.

11. That SIA security staff and/or stewards to be briefed to monitor and remind patrons where necessary to leave the site quietly

12. That any substantial queues formed within and outside the premises shall be supervised by event staff where appropriate. Such supervision shall be aimed at preventing disorder and discouraging anti-social behaviour.

13. All staff will receive licensing training in relation to the sale of alcohol, times and conditions of the premise prior to the premises opening. Training records will be kept on the premises.

14. That a comprehensive incident book / incident recording system shall be kept at the premises to record details of any of the following occurrences at the premises:

- Instances of anti-social or disorderly behaviour
- Violence
- Calls to the police or fire brigade
- Abuse of staff and / or customers
- Ejections of people from the premises
- Visits to the premises by the local authority, police or fire brigade
- Refused sales of alcohol
- Any malfunction in respect of the CCTV system
- Any other relevant incidents

15. The incident book / incident recording system shall record the time, date, location and description of each incident, the printed and signed name of the person reporting the incident and any action taken in respect of the incident. The incident book / incident recording system shall be available / be accessible at the premises at all times that the premises are in use in accordance with this licence and shall be made available to officers of the council, police or fire brigade on request.

16. That a written record is kept of all staff authorised to sell alcohol; this staff record is to contain the full name, home address, date of birth and national insurance number of each person so authorised. The staff record is to be kept on the licensed premises and made available for inspection by the Licensing Authority, Trading Standards or the Police as soon as reasonably practicable.

17. That SIA security staff and/or stewards to be briefed to monitor and remind patrons where necessary to leave the site quietly.

18. A digital CCTV system must be installed in the premises complying with the following criteria:

- Cameras must be sited to observe customer entrance and exit doors both inside and outside, the bars and floor areas.
- Where practical be capable of visually confirming the nature of the crime committed.
- Provide a linked record of the date, time and place of any image.
- Provide good quality images during opening times.
- Have the recording device located in a secure area or locked cabinet.
- Have a monitor to review images and recorded picture quality.
- Be regularly maintained to ensure continuous quality of image capture and retention.
- Have signage displayed in the customer area to advise that CCTV is in operation.
- Digital images must be kept for 31 days.
- The police and authorised officers of the council will have access to images upon request
- The equipment must have a suitable export method, e.g. CD/DVD writer so that the police or authorised officers of the council can make an evidential copy of the data when they require.
- All cameras shall record constantly during all hours the premises are open to the public or to a section of the public permitted access for corporate or private events.
- There must be a member of staff on site who can operate the CCTV when requested

19. That all information contained in the transport statement submitted to Enfield Council on application for this licence will be implemented by the premises licence holder. A copy of the transport statement shall be kept at the premises and be made available to council or police officers on request.

20. For any event that runs past an operational time of 4:00am a last entry policy will be in place stopping guests from entering the venue past 1:00am.

21. Licensable activities such as the sale of alcohol will cease one hour prior to the venue closing for events with a run-time to 6:00am, allowing a one-hour wind down unless agreed in advance with the responsible authorities.

c) Public safety

22. That for each event an event overview shall be prepared and be made available for inspection by the responsible authorities.

23. That unless otherwise agreed in writing with the Licensing Authority, details of any proposed use and storage of lasers, special effects, fireworks or pyrotechnics shall be reflected in the Venue Operational Plan

24. That a medical plan shall be devised in respect of the premises and a copy of the medical plan shall be available / be accessible at the premises at all times that the premises are in operation. The medical plan shall be made immediately available to council or police officers on request. First aid cover and facilities appropriate to any event must be provided in accordance with the medical plan.

25. That toilet facilities will be appropriately provided in accordance with each Venue Operational Plan, including the provision of external toilets if and when required.

d) The prevention of public nuisance

26. That a comprehensive Noise Management Plan shall be devised and reflected in the Venue Operation Plan in respect of the premises and a copy of the Noise Management Plan shall be accessible at the premises at all times that the premises are in operation. The Noise Management Plan shall be made immediately available to council or police officers on request. That the licensee will ensure that the premises Noise Management Plan is adhered to at all times.

27. That all relevant staff working at the premises shall be trained in the content of the Noise Management Plan and be aware of their responsibilities and duties under it. Records of relevant training shall be kept with the Noise Management Plan.

28. That the Noise Management Plan shall be reviewed whenever there is a significant change at the premises. For example, a significant change could include a new licensee, change to premises layout, a refit, a change to the type or style of licensed entertainment etc.

29. That a telephone number and/or email address should be made available on relevant websites for any noise complaints. Any noise complaints should be logged and investigated with written records of the details available to view by the Local Authority. Should any noise complaints be received, and if noise levels are above those specified in the licence conditions, action should be taken to reduce the levels at the noise source.

30. That in the event of an emergency, music will cease and safety announcements will be relayed to attendees to a suitable non-powered back-up system will be in place.

31. That patrons of the premises shall be provided with the details of preferred mini cab companies.

32. That permitted sound levels shall be specified in the contract conditions with hirers of the premises to ensure sound levels are maintained within the limits in order to reduce the risk of disturbance. Further, during a function in the premises, sample noise measurements shall be made by a designated person with an approved sound level meter to ensure that the levels are not being breached. Immediate action will be taken to reduce levels if this should arise.

e) The protection of children from harm

33. That a challenge 25 scheme shall be maintained at the premises requiring that staff selling alcohol request that any customer who looks under 25 years old, and who is attempting to purchase alcohol, provides valid photographic identification proving that the customer is at least 18 years old. Full details will be contained in the youth and vulnerable person policy.

34. Clearly legible signs shall be prominently displayed stating to the effect that a challenge 25 policy is in operation at the premises, that customers may be asked to provide proof of age and stating what the acceptable forms of proof of age are.

35. That suitable records are kept of all refused sales of age restricted products.

36. The operational procedure of all bars will adhere to the Venue Operational Plan

37. The Youth and Vulnerable persons policy agreed with the responsible authorities will be in operation at all events.

Checklist:

Please tick to indicate agreement

- I have made or enclosed payment of the fee.
- I have enclosed the plan of the premises.
- I have sent copies of this application and the plan to responsible authorities and others where applicable.
- I have enclosed the consent form completed by the individual I wish to be designated premises supervisor, if applicable.
- I understand that I must now advertise my application.
- I understand that if I do not comply with the above requirements my application will be rejected.
- [Applicable to all individual applicants, including those in a partnership which is not a limited liability partnership, but not companies or limited liability partnerships] I have included documents demonstrating my entitlement to work in the United Kingdom (please read note 15).

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

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.

Part 4 – Signatures (please read guidance note 10)

Signature of applicant or applicant's solicitor or other duly authorised agent (see guidance note 11). **If signing on behalf of the applicant, please state in what capacity.**

Declaration	<ul style="list-style-type: none"> • [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)
Signature	<i>Woods Whur</i>
Date	<i>15th March 2019.</i>
Capacity	Woods Whur 2014 Limited - Solicitors for the Applicant

For joint applications, signature of 2nd applicant or 2nd applicant's solicitor or other authorised agent (please read guidance note 12). **If signing on behalf of the applicant, please state in what capacity.**

Signature	
Date	
Capacity	

Contact name (where not previously given) and postal address for correspondence associated with this application (please read guidance note 13) Paddy Whur Woods Whur 2014 Limited Devonshire House 38 York Place			
Post town	Leeds	Postcode	LS1 2ED
Telephone number (if any)	0113 234 3055		
If you would prefer us to correspond with you by e-mail, your e-mail address (optional) carole@woodswhur.co.uk			

Annex 4



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Licensing Officers,
Environment & Operational Services
Place Directorate
Enfield Council
Silver Street
Enfield
EN1 3XY

C/O Licensing office
Metropolitan Police Service
North Area BCU
Edmonton Police Station
462 Fore Street
London N9 0PW
E-mail:

www.met.police.uk

11th April 2019

Meridian Water, Units 4, 5, 6, 6a and b, 5 Argon Road,
London N18 3BW

“Events Application”

Dear Sir / Madam,

I write with regards to the above application, which is an application for a new premises licence in accordance the Licensing Act 2003.

The Metropolitan Police hereby make objection to the application on the grounds that should it be granted in its current form it is likely to undermine the

Prevention of Crime and Disorder, the Prevention of Public Nuisance and the Public Safety licensing objectives.

The application is submitted by Broadwick Venues Ltd and is made in regard to the Meridian Water site within Enfield Borough. Currently this is a disused area of land with numerous warehouses however it is an area that will be subject to significant development and regeneration in the future.

In close proximity to the site there are two large business premises and a large football stadium accommodating a Premier League Football Club, Tottenham Hotspur.

The Metropolitan Police are keen to support regeneration of this area however should this application be granted in its current form it is the view of the Police that incidents of crime and disorder would increase and in addition there would be significant risk to public safety.

This application is one of two Premises licence applications that has been submitted for this site, with this one seeking a Premises Licence for events at a number of warehouses named 'The Drum Sheds'. The applicant seeks to hold events (Corporate / Live Music and Club nights) for up to 9,999 persons within the warehouses located on the site.

The applicant requests all licensable activities at the venue between 0800 – 0600 over 365 days a year.

If granted, this would permit the venue to open as one of the world's largest nightclubs (matched only by, e.g. Privilege nightclub in Ibiza). In the general description of the premises given at page 4 of the application form it is stated that "DJ-led music events" are intended for the venue among other events.

Unlike the application for Field Day in the parallel "Festival Application", there is no requirement within this application for any events to be subject to the scrutiny of the SAG process.

Under this "events application" there can be up to 9,999 persons needing to be safely dispersed from the warehouses without the requirement for robust measures to be put in place. These visitors may have to walk some 1.5 miles to the local tube station along a busy fast moving road (Meridian Way). Without adequate marshalling and supervision this creates significant public safety risks.

There is, as always, likely to be a commercial imperative for operators to use the licences to their fullest extent and in light of this Police have met with the applicant in order to establish detailed plans for the site. Following this meeting Police have received an e-mail stating that they would seek to use the site for up to 25 large external events and 100 indoor events for in excess of 5,000 persons. No number has been given for events under 5000 persons however there would be nothing to stop the applicant using the warehouses as a large night club every weekend. The applicant however has offered to provide Police with an event management plan for events over 5000 capacity.

This would mean that should this application be granted that the warehouses could be used every weekend to accommodate up to 9,999 persons until 06:00 hours in the morning as a night club.

That would place an intolerable pressure on limited police resources and so engages the prevention of crime and disorder objective because in the absence of sufficient numbers of police officers to police all these events, there is a reduced chance of crime and disorder being prevented.

In addition if this licence was to be granted there would be nothing to prevent the applicant holding large events for up to 9,999 persons over the August Bank

Holiday weekend for a 'Notting Hill' after party and New Year's Eve parties (NYE Non Standard hours) until 06:00 hours in the morning. These events would not be subject to the scrutiny of SAG meetings and it would be the view of Police that incidents of crime and disorder would increase significantly and place further strain would be placed on already stretched Police resources.

Police would also have concerns that should any violence take place the large scale egress and subsequent congestion at limited public transport hubs could lead to further clashes between groups & individuals who have consumed alcohol or are fuelled by other motives as they make their way over the 1.5 mile journey to the local tube station (24 hours).

Geographically this is an area of land within Enfield Borough that is close proximity to two business premises and a large football stadium.

Police experience suggests that persons would attend the nearby supermarket to purchase cheaper alcohol prior to attending the Meridian Water site (pre loading). Persons may well also attend the supermarket at the conclusion of events to purchase further alcohol thus hindering the dispersal of persons from this area.

In conclusion if this application is granted in its current format it is the view of the Police that the licensing objectives of the prevention of crime and disorder , the prevention of public nuisance and public safety would be undermined.

Police are keen to support the applicant in the regeneration of this area but it is important that members of the public are kept safe and incidents of crime and disorder do not increase. Should this application be refused it would not adversely affect the proposed Field Day event.

We would make the additional point that the plans attached to the application appear to be non-compliant with reg.23 of the Licensing Act 2003 (Premises

Licence) Regulations 2005 and so this application is defective in a material way.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'J. Waterfield', with a long horizontal flourish extending to the right.

AI Chief Inspector Jonathan Waterfield

North Area Neighbourhood Policing (Enfield & Haringey)

IP4 Representation Events – London Fire Brigade

**Premises: Drum Sheds / Meridian Water, Units 4, 5, 6 & 9 Orbital
Business Park, 5 Argon Road, Edmonton, London, N18 3BY**

The London Fire Commissioner (the Commissioner) is the fire and rescue authority for London. The Commissioner is responsible for enforcing the Regulatory Reform (Fire Safety) Order 2005 (The Order) in London.

With reference to the application dated 15/03/2019, as shown on the plan provided, the application has been examined and **the Commissioner will make a representation** to the Licensing Authority.

The Applicant has been informed, by copy of this letter, of this representation.

The items that are of concern to this authority are detailed below:

- **The Commissioner has not received all of the information required and has not therefore been able to form a judgement as to whether the public safety objective of the Licensing Act has been adequately addressed.**
- **The applicant has not shown that the number of people to be accommodated can be safely evacuated in an emergency.**

The representation may be withdrawn if all of the matters detailed above are addressed to the satisfaction of the Commissioner. The Commissioner must be advised of the completion of the work at least 5 working days before the committee hearing date, so that an inspection can be arranged.

If you are dissatisfied in any way with the response given, please send an email to FSR-AdminSupport@london-fire.gov.uk, quoting our reference 32/205151/DL.

Regards
London Fire Brigade
Fire Safety Regulation Admin
169 Union Street
London
SE1 0LL
T: Helpdesk 020 8555 1200 x89170
E: FSR-AdminSupport@london-fire.gov.uk

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LONDON FIRE BRIGADE

FIRE SAFETY GUIDANCE NOTE

Number:

**Guide to Applicants for Premises Licences and Club
Premises Certificates under the Licensing Act 2003**

GN71

The London Fire Commissioner (the Commissioner) is the fire and rescue authority for London. The Commissioner is responsible for enforcing the Regulatory Reform (Fire Safety) Order 2005 (The Order) in London.

This Guidance Note provides advice on the information and standards required by the Commissioner from applicants applying for licences under the Licensing Act 2003.

This Note is one of a series produced by the Commissioner to provide advice on various aspects of fire safety. If you require any further guidance on the advice given or require advice on another topic please visit your local Fire Safety Office, telephone 020 8555 1200 and ask for the nearest Fire Safety Office, or visit our web site at <http://www.london-fire.gov.uk>

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1 INTRODUCTION

1.1 This guidance is intended for use by applicants for:

- New premises licences
- Variations to existing premises licences
- New Club premises certificates
- Variations to existing club premises certificates
- Provisional statements

2 ROLE OF THE FIRE AUTHORITY

2.1 Fire Authorities are designated as a 'Responsible Authority' under the Licensing Act 2003 (the Act). The London Fire Commissioner (the Commissioner) is the Fire Authority for all 32 London Boroughs and the City of London. The Act requires that applications for the above licences are copied to the Fire Authority. The aim of this consultation is to promote public safety. The Act has four statutory objectives:

- The prevention of crime and disorder.
- Public safety
- The prevention of public nuisance
- The protection of children from harm

2.2 The Act was implemented whilst the Fire Precautions Act 1971 (FPA) was the primary piece of fire safety legislation. The FPA was repealed through the introduction of the Regulatory Reform (Fire Safety) Order 2005 (the Order), resulting in a number of changes to the Act. The principal change being that whilst fire authorities are a Responsible Authority, they should use their own enforcement powers through the Order where possible, rather than the Act. This does not negate the requirement under the Act for an individual or organisation to send applications for consultation to the Fire Authority. You are reminded that the Act embodies a self-regulatory approach with licencees taking control of the risks that they create.

2.3 From existing premises information and that provided, we will make an assessment of the fire safety provisions in relation to the public safety objective of the Act. Where we believe that this objective is not being adequately met and we cannot take action under the Order, we may make a representation about this to the Licensing Authority.

2.4 You are required to send the Commissioner:

- A copy of the Application Form including the Operating Schedule.
- Scaled plans of the premises (see below for more information).
- A copy of the Fire Risk Assessment (if completed).

2.5 In processing your submission we will:

- Check that we have sufficient information to make an assessment (Note: where insufficient or late information is supplied we may make a representation to the Licensing Authority) .
- Carry out a fire safety assessment of the application in relation to the licensing objectives.
- Where necessary, visit your premises to gather more information or carry out a fire safety audit
- Advise you and the licensing authority in writing whether we intend to make a representation or not.

- Where we are making a representation we will inform you which issues are causing us concern.
- Provide advice and guidance in order to avoid unnecessary hearings.

3 THE FIRE SAFETY CONTENT OF YOUR OPERATING SCHEDULE

- 3.1 As part of your 'steps to promote the public safety objective' you should consider the fire safety arrangements for your premises. This will mean carrying out a thorough fire safety risk assessment. (For further information on how to carry out a fire risk assessment see our Guidance Note 66 or refer to www.gov.uk). The Order requires the responsible person to carry out a fire risk assessment and act upon the significant findings to reduce the risks from fire. Where a fire risk assessment already exists it should be reviewed to ensure that it takes account of any changes that you propose to make and also to ensure that it makes adequate provision for the safety of all the people who may be at the premises. If you haven't sent us a copy of your fire risk assessment with the application, we may ask to see your fire risk assessment and want to discuss with you any significant findings.

4 SAFE CAPACITY

- 4.1 Your fire risk assessment should include an evaluation of the means of escape and the number of people that can safely be accommodated at the premises. In some premises this evaluation may show that the exits are sufficient for a greater number of people than could be present. Where a 'safe capacity' is necessary you should include this with your submission. Safe capacities are best expressed in clear and simple terms e.g. "The maximum capacity of the premises at any one time will be restricted in respect of the ground floor to 300 persons and in respect of the first floor to 100 persons." Capacity should normally be inclusive with respect to staff and performers.
- 4.2 Note: In meeting the four statutory objectives of the Act (Paragraph 2.1), the capacity of the premises for licensed purposes may be less than the actual capacity of the premises allowed by a fire safety fire risk assessment.

5 PERMITTED CAPACITY RECOMMENDATION

- 5.1 Section 177 of the Act, which now only applies to performances of dance, and Section 177(a) which applies to music, provides for the suspension of some licensing conditions in some smaller premises that have a 'permitted capacity' of not more than 500 persons. The Act states that the fire authority must be asked to make a recommendation on the capacity. If you wish the Commissioner to recommend a 'permitted capacity' you should first conduct a risk assessment and assess the capacity of your premises using an appropriate standard (see section below on underpinning standards). You should then submit your request together with scaled plans as detailed below. We will consider your request and respond accordingly.
- 5.2 Applicants should be aware of various changes to the original Licensing Act 2003 through a variety of other Acts of Parliament and the guidance issued under the Act (Section 182 Guidance).

6 SCALED PLANS OF YOUR PREMISES

- 6.1 NB: Scale required is 1:100 (i.e. 1 centimetre = 1 metre)
- 6.2 Regulations made under the Act detail the following information that should be included on the scaled plans that must be submitted with your application:
- (a) The extent of the boundary of the building and any external and internal walls, and if different, the perimeter of the premises.
 - (b) The location of points of access to and egress from the premises.
 - (c) If different from (b) the location of escape routes from the premises.

- (d) Where the premises are used for more than one existing licensable activity, the area within the premises used for each activity.
 - (e) Fixed structures (including furniture) or similar objects temporarily in a fixed location (but not furniture) which may impact on the ability of individuals to use exit or escape routes without impediment.
 - (f) The location and height of any stage or raised area.
 - (g) The location of any steps, stairs, elevators, or lifts.
 - (h) The location of public conveniences.
 - (i) The location and type of any fire safety equipment, including marine safety equipment.
 - (j) The location of any kitchen.
- 6.3 At the back of this guidance note (appendix B) there is a specimen plan, that shows how this information may be recorded. This plan uses well recognised, standard symbols and a key to these symbols is attached (appendix A) for your convenience. For example, the plan shows safety equipment such as fire extinguishers, fire alarm call points and automatic fire detectors, using these symbols.
- 6.4 The plan also shows some additional information:
- (i) The intended use of each room.
 - (ii) The size of the licensed area(s) (in square metres).
 - (iii) Walls, doors (including direction of opening), partitions and glazing which are fire resisting for not less than 30 minutes.
 - (iv) All exit routes, showing clear exit widths of doors, passageways, staircases and final exits.
- 6.5 Having all of your fire safety information available on one plan may assist you with your emergency planning and staff training. It will also enable the fire authority to assess your fire precautionary measures with the minimum of delay.

7 UNDERPINNING STANDARDS

- 7.1 Although each premises will be assessed on an individual basis we will use the following published guidance to provide underpinning standards:

Communities & Local Government Publications. These are available to download free of charge from: <http://www.communities.gov.uk/fire>

- Entry Level Guide: 'A short guide to making your premises safe from fire'
- Fire Safety in Small and medium places of assembly
- Fire Safety in Large places of assembly
- Fire Safety in Theatres and cinemas
- Fire Safety in Open air events and venues
- Fire Safety Risk Assessment - Means of Escape for Disabled People

Other documents:

- The Building Regulations 2000 - Approved Document B (available to download free of charge from: <http://www.planningportal.gov.uk/buildingregulations/approveddocuments/partb/bcapprove/ddocumentsb/>)

- Annex E & F of "Guidance issued under section 182 of the Licensing Act 2003" (available to download free of charge from:
http://www.culture.gov.uk/reference_library/publications/3667.aspx)
 - Appropriate British & European Standards e.g. BS 5839 and BS EN3
- 7.2 Each area requiring the provision of emergency lighting to assist escape in case of normal lighting failure, should be indicated on the plan using the appropriate symbols. Lighting design and installation should normally conform to BS 5266, and be installed by a competent person, preferably with third party accreditation.
- 7.3 Fire alarm systems should normally conform to the current edition of BS 5839, with consideration made for prevention of false alarms, and appropriate provision based on your fire risk assessment and the nature of the entertainment, e.g. visual indicators, phased systems and any links to disable sound systems. Installation should be made by a competent person, preferably with third party accreditation.
- 7.4 Fire-fighting equipment provided should normally conform to BSEN 3 or equivalent relevant standards. (Fire Safety Guidance Note 8: Hand held portable fire-fighting equipment, gives further guidance).
- 7.5 All necessary fire related signs and notices should normally conform to the Health and Safety (Safety Signs & Signals) Regulations 1996 or BS 5499.

8 PEOPLE with disabilities

- 8.1 The requirement to comply with access and means of escape for persons with disabilities will normally be considered to have been addressed where the recommendations/guidance in Approved Document M of the Building Regulation 88300 or BS 9999 have been satisfied. The fire risk assessment should demonstrate suitable and sufficient arrangements for the safety of persons with disabilities in the event of a fire emergency. The Equality Act 2010, requires reasonable physical adjustments to physical features that make it unreasonably difficult for persons with disabilities to use a service.

9 LARGE TEMPORARY EVENTS

- 9.1 These may involve a single premises licence to cover a wide range of activities at varied locations within the premises or a series of connected premises licences that in combination represent a single event. We strongly advise event organisers to set up a co-ordinating committee (Safety Advisory Group) and commence discussion with the Licensing and other Responsible Authorities at the earliest opportunity. The Commissioner can also provide pre-application fire safety advice to event organisers.

10 OUR RISK BASED INSPECTION & ENFORCEMENT PROGRAMME

- 10.1 Our intention is to focus our inspection and enforcement activities where the risks to people are greatest. To achieve this we will:
- Risk grade individual premises to identify higher and lower risks
 - Inspect higher risk premises more frequently
 - Target enforcement activity at known higher risk premises
 - Use enforcement action under fire safety laws in parallel with action under the Licensing Act
 - Where permitted we will share information on problem premises with other authorities

11 RESIDENTIAL ACCOMMODATION IN LICENSED BUILDINGS

- 11.1 Whilst the new licensing regime relates only to the areas in your premises that are used for licensable activities, in some cases the greatest risk to life will be found in associated sleeping accommodation. You should take the opportunity to reassess these risks and consider:

- Where could a fire start and how will it effect anyone sleeping in the premises?
- How will they be alerted to a fire? Would automatic fire detection reduce the risks?
- How will they make their escape once alerted? Is there adequate protection and emergency escape lighting to the means of escape routes?

11.2 The exact legal position is dependant upon the nature of the risks and also the relationship between the responsible person and the people using the sleeping accommodation. Where the Commssioner's officers visit premises they will assess the risks to everyone and take any appropriate action including:

- Enforcement action under fire safety laws that we enforce.
- Passing information to other authorities that enforce relevant legislation i.e. Housing Act.

12 OTHER LEGISLATION

12.1 Applicants are reminded of the need to consult with a Building Control Authority/Agency where it is proposed to alter the structural layout or change the use of premises.

12.2 The Responsible Person must comply with the requirements of the Order when preparing their fire risk assessment. Further guidance relating to fire precautions in licensed premises can be obtained by referral to the relevant organisations detailed in the bibliography below:

13 Bibliography

13.1 Further guidance may be obtained from the following publications:

AVAILABLE FROM	TITLE
The Stationery Office (Mail, Telephone, Fax & Internet Orders)	Entry Level Guide: 'A short guide to making your premises safe from fire'
TSO Orders/Post Cash Dept PO Box 29 Norwich NR3 1GN	Fire safety in small and medium places of assembly ISBN-13: 978 1 85112 820 4
Telephone: 0870 600 5522 Fax orders: 0870 600 5533 Web: www.tso.co.uk	Fire safety in large places of assembly ISBN-13: 978 1 85112 821 1
	Fire safety in theatres and cinemas ISBN-13: 978 1 85112 822 8
	Fire Safety Risk Assessment - Means of Escape for Disabled People ISBN: 978 1 85112 873 7
HSE Publications: http://www.hse.gov.uk/	1. Five steps to risk assessment
HSE Books PO Box 1999 Sudbury Suffolk CO10 0JY	2. The event safety guide
Telephone: 01787 884148	

Association of British Theatre Technicians/LDSA Publications are available from the ABTT website: <http://www.abtt.org.uk/pages/home/homeframes.html>

OR

ABTT
55 Farringdon Road
London EC1M 3JB

Telephone: 0207 242 9200

BSI Shop

Online:

<http://shop.bsigroup.com/>

Offline & enquiries:

Email: cservices@bsigroup.com

Tel: +44 845 086 9001

Fax: +44 20 8996 7001

BSI Customer Services
389 Chiswick High Road
London
W4 4AL

[Planning Portal](#)

Online government website:

<http://www.planningportal.gov.uk/>

1. The Model National Standard Conditions for Places of Entertainment and Associated Guidance
2. Technical Standards for Places of Entertainment

BS 8300 - Design of buildings and their approaches to meet the needs of disabled people. Code of practice

BS 9999 - Code of practice for fire safety in the design, management and use of buildings

Approved Document M (Access to and use of buildings) - Volume 1: Dwellings – free to download

The above publications are current at the time of preparation of this Guidance Note (see date at foot of last page).

The "Fire Safety" guides listed above may also be downloaded free of charge from the Fire Safety Law Section of the CLG website at: www.communities.gov.uk

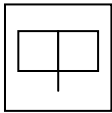
Key to Plan Symbols

Means of escape and equipment

All doors, walls, partitions, screens and glazing shown in: -

- (a) Thick black line, or
- (b) Thick black broken line, or
- (c) Red

on plan are to comply with the definition of FIRE RESISTING.



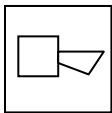
Fire Alarm Call Point with Fire Action Sign adjacent, the contents of which should be based on the Fire Safety and Evacuation Plan for the premises.

SL

Security Lock (Door, which may be provided with special fastening as described on plan).

FFF

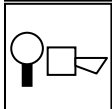
Doors which are to be free from all fastenings (other than a ball or roller fastening or a lever handled latch). This is to ensure that the door is always available for escape from either side.



Control panel sounders.



Control panel illuminated signals .



Control panel sounders and illuminated signals.

SCA

Self-closing door incorporating an automatic release e.g., Electro Magnetic Door Holder.

PB

Doors which are to be provided with a panic bolt. There should be a notice adjacent to the fastening indicating the method of opening (minimum 5mm lettering).

SF

Doors that have only a simple fastening which is easily and immediately openable by a person on his/her way out without use of a key, e.g., barrel bolts, night latch, lever handle, etc.

TP

Fire Alarm Telephone point.

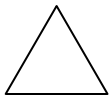
VP

A panel of clear glass in the door or adjacent partition shown on plan. It should be of an appropriate size and in a suitable position which gives the occupant of the inner room early visual warning of fire. This glass should be Fire Resisting if the door or partition is shown as such.

S

Door assembly, which is able to resist the passage of smoke when, tested in accordance with the British Standard in force at the date of manufacture.

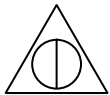
Fire fighting equipment



Fire Extinguisher: e.g. 13A or 34B. Number indicates the extinguishing capability and the letter indicates the class of fire that the extinguisher is suitable for. For further information see our guidance note FSGN 8.



Aqueous Film Forming Foam Extinguisher



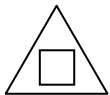
Water Fire Extinguisher



Fire Blanket in container



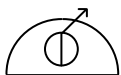
Carbon Dioxide Fire Extinguisher



Dry Powder Extinguisher



Foam Fire Extinguisher



Hydraulic hose reel. A number following this symbol indicates the length of the tubing in metres.



Sand Bucket



Area covered by Fixed Fire Extinguisher installation (i.e. Co2)



Area covered by Automatic Sprinkler installation.

All firefighting equipment should be so placed as to be readily available for use. They should be mounted on brackets or suitable shelves in conspicuous positions so that the carrying handles of the larger heavier extinguishers are approximately 1m from the floor, and the handles of the smaller fire extinguishers/base of fire blankets are approximately 1.5m from the floor.

Other codes



Area covered with a system of Escape Lighting that will illuminate the area upon failure of the normal lighting power supply, to a sufficient standard to enable persons to leave the area safely. The escape lighting system should conform to the British Standard current at the time of its installation and a certificate to this effect kept.



Refuge Area temporary assembly point for those persons of impaired mobility, e.g.: wheelchair users, who are unable to independently reach a final exit. BS5588, pt8, Section 8 refers. Refuge areas should be a minimum of 900mm X 1400mm.



Area covered by Automatic Heat Detectors



Area covered by Automatic Smoke Detectors

PR

Area covered by Pressurisation system

MSE

Area covered by Mechanical Smoke Extraction

NSE

Area covered by Natural Smoke Extraction

POC

Pressurisation Override Control

Notices

S22

Boxes like this indicate signs. The following codes show the wording displayed on the notices.

All notices should normally conform to the British Standard for signs which is current at the date of installation and the minimum size of lettering is as indicated below unless otherwise shown adjacent to the code on plan.

S22

Additional Notes

Directional arrow.

S22

S

Notice suspended above head height at right angles to the escape route with the graphic symbol on the approach side.

S22

SS

As above but with the graphic symbol on both sides of the notice.

S22

Indicates that the notice is internally illuminated.

S22

Fire exit, exit or emergency exit notice graphic symbol.

Minimum size of lettering

S23

Slide to open (with arrow indicating direction).

25 mm

S20

Fire escape keep clear.

25 mm

S19

Gangway keep clear.

25 mm

S17

Secure door open when premises are occupied.

25 mm

S8

Highly flammable material - keep locked.

25 mm

S2

No smoking.

25 mm

S13

Fire door keep shut.

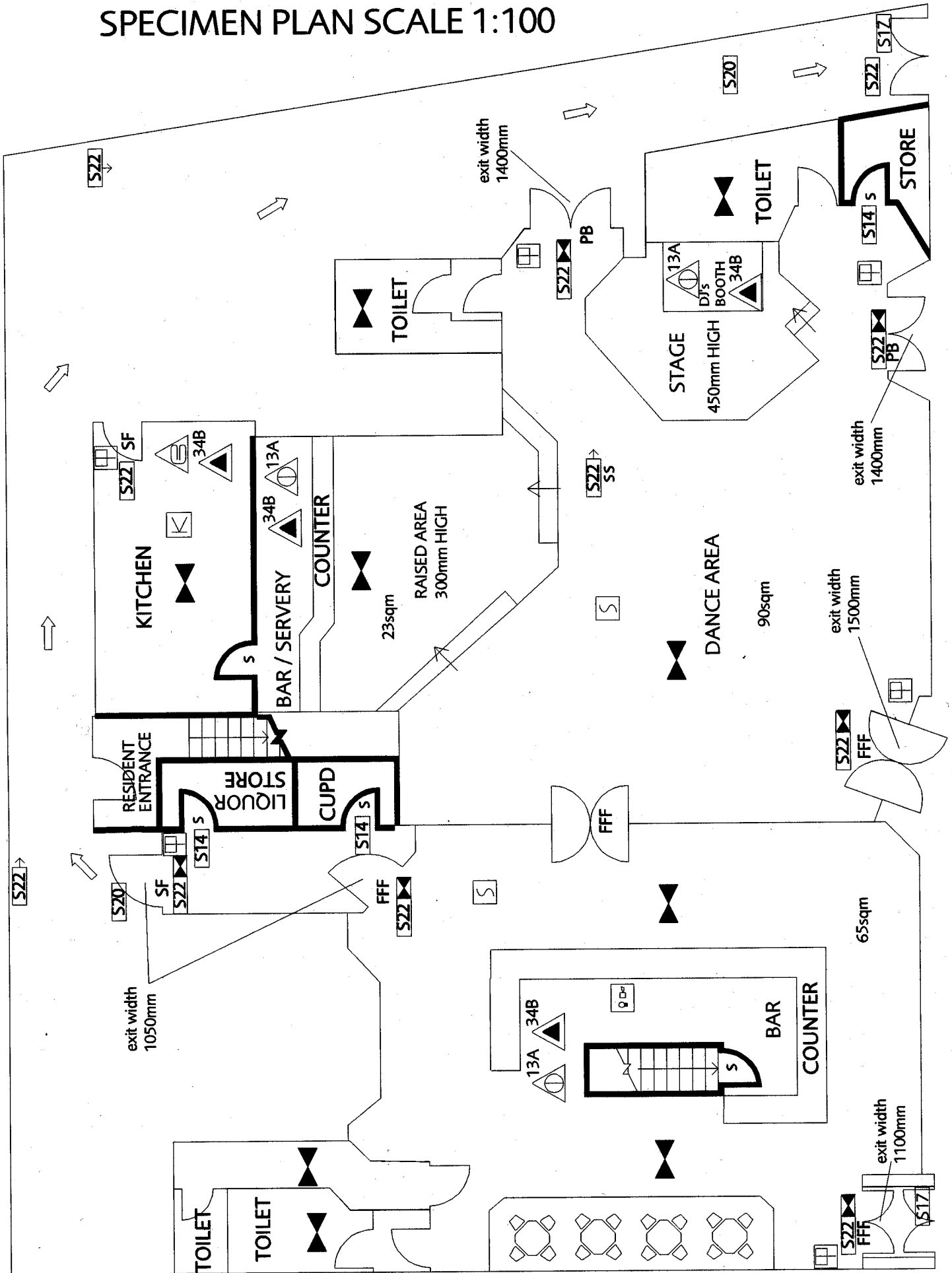
5mm

S14

Fire door keep locked.

5mm

SPECIMEN PLAN SCALE 1:100



IP1 Representation – Resident A

I wish to object to the licence application on the grounds that the noise nuisance generated by this venue will unreasonably and substantially interfere with the use or enjoyment of my home and garden. As I am a person that is sensitive to noise pollution (there are many others), it makes my life miserable leading to depression and anxiety and it's impact at night is especially unwelcome as my sleep is disturbed.

This application is for 8 am until 6 am the following morning, seven days a week. This is an unacceptable amount of time for a person to be subjected to noise nuisance. Potentially this nuisance could continue for days on end.

There is very little built environment between the venue and a densely populated area of Waltham Forest. The prevailing wind is from the west and carries the sound across the river valley and reservoir.

In the past there was a Warehouse music venue on a site very close to this new proposal. I was regularly woken by the noise, and it took me some time to establish the source, allowing me to make a complaint. Many people in Waltham Forest complained about the noise disturbance but were unable to trace the source.

My compromise would be that a license is granted for a limited number of days each month and for a trial period of time (not one year!) to see how residents respond. At the moment this venture has had no publicity in Waltham Forest. I understand you have fulfilled your legal requirement regarding the posting of notices, regrettably noise nuisance does not end at the borough boundary.

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BLANDY & BLANDY

solicitors

The Licensing Authority
London Borough of Enfield
By Email Only

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DX 4008 Reading
www.blandly.co.uk

DD: 0118 951 6822
DF: 0870 197 5383
E: Sue.Dowling@blandly.co.uk

Our Ref: SED/TOT9/10
Your Ref: Licensing
Authority/Ellie Green
Date: 12 April 2019

Dear Sirs

Relevant Representations against new Premises Licence applications:

- WK/218074640:** Units 4-6B Orbital Business Park, 5 Argon Road, London N18 3BW –
Capacity Limit: 9,999
- WK/218074598:** Units 4-6B Orbital Business Park, 5 Argon Road, London N18 3BW –
Capacity Limit: 39,999
- WK/218074578:** Meridian Water Land to South of Units 4 to 6B, Orbital Busin,
5 Argon Road, N18 3BW.
Capacity Limit: 39,999

Our Client/Objector: Tottenham Hotspur Limited and Tottenham Hotspur Football & Athletic Co Ltd, both of Lilywhite House, 782 High Road, London N17 0BX

We have been instructed by the above-named clients to lodge representations against the above three applications made by the Applicant (Broadwick Venues Limited) seeking Premises Licence(s) in relation to proposed licensed "Premises" as identified in the above heading.

Introduction

Unless otherwise stipulated in this letter, kindly note that:

1. The contents of this Representation applies in terms of relevance to and/or in objection to, each of the (three) Applications;
2. This Representation is in addition to and should be read in conjunction with the Representation lodged on 23 January 2019 ("the Original Representation") which relates to the same proposed licensed "Premises".

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General Observations/Objections to the Applications

Before setting out in detail the nature of our clients' objections to the applications, our clients wished to put on record their dismay at what they perceive is a total lack of serious engagement that the Applicants have displayed to date, not only with the statutory licensing process but also with regards to proper engagement with their organisation, and others in the locality, whose input should clearly matter to the Applicant.

Bearing in mind that our clients' fully licensed and GSC certificated Stadium is 'a stone's throw' away from the Applicants' proposed "Premises", our clients expected the Applicants to be in a position to share properly articulated plans (for example relating to transport management; crowd control; stewarding; security etc...) to demonstrate how they propose operating a large scale event, in a locality where the infrastructure will already be saturated by existing licensed events.

Disappointingly the Applicants have not been forthcoming with any specifics as to how they will ensure that their proposed licensable activities will not (as a result of cumulative impact, or otherwise) negatively impact on the promotion of all four licensing objectives.

In sharp contrast, the Applicants appear to be acting in a manner which assumes that the issue of a Premises Licence for large scale festival events (in an open space with no infrastructure supporting such events) is a foregone conclusion. This is evident from their (and/or their partners) website relating to the Field Day festival event in June 2019 (see printed information at **Appendix 1**). Although this large-scale event (which clearly will involve considerable licensable activities and large crowds) has been heavily promoted and is bound to have a significant impact on the promotion of the Licensing Objectives, as far as our clients are aware, no specifics have been made available concerning any proposed SAG meeting.

Grounds for our Clients' Representation:

The grounds of our clients' Representation are essentially fivefold (although the grounds overlap and include numerous individual elements):

1. The Applicants' failure to comply with the statutory procedural requirements of the Licensing Act 2003 and supporting Regulations, resulting in the Licensing Authority not having authority to consider the applications (through delegated powers or at Committee); and/or
2. The Applicant's failure to particularise in any meaningful way its Operating Schedule for the proposed "Premises", resulting in the applications being devoid of any specifics on which the Licensing Authority, other Responsible Authorities and local interested parties (businesses and local residents) can reasonably be expected to respond; and/or
3. The Applications are an attempt to usurp the position of the Responsible Authorities (and the Licensing Committee) by seeking to transfer their obligations and powers to



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a (yet to be defined) Safety Advisory Group;

4. The Applications are an attempt to transfer the management and operational responsibilities for the promotion of the licensing objectives at the proposed "Premises" to the SAG, which is fundamentally wrong; in breach of the "Purple Guide" recommendations and other Event Industry recommendations;
5. Without limiting the above, the applications are fundamentally flawed as they fail to articulate with any precision how the four licensing objectives will realistically be met at the proposed "Premises" when existing licensed Premises (including large venues such as Tottenham Hotspur Stadium; Alexandra Palace and/or the London Stadium are operating events within the remit of existing licensing authorisations.

To expand on the five Grounds set out above, we have prepared the attached table (at **Appendix 2**) to provide specifics to assist the Licensing Authority, other Responsible Authorities, and the Applicant to understand the full rationale behind our clients' objections to the proposed applications; why we consider that the Licensing Authority should not have accepted the applications and/or why the applications should be refused in their entirety.

Conclusions:

In view of the detailed Representation above (and set out in Appendix 2) and the very serious concerns that these Premises Licence applications have raised (relating to the promotion of the licensing objectives), the Applicant may consider it best to withdraw their applications.

Kindly confirm safe receipt of this letter of Representation (with three appendices) on behalf of Tottenham Hotspur Limited (of Lilywhite House, 782 High Road, London N17 0BX) and on behalf of Tottenham Hotspur Football & Athletic Co Ltd (of the same address). Please note that any correspondence or information relating to this matter should be sent to the writer or emailed to her at Sue.dowling@blandy.co.uk

Yours faithfully

Blandy & Blandy LLP

- Appendix 1: Information about Field Day Event in June 2019 at the proposed Premises;
Appendix 2: Table setting out specifics of the Grounds for the Representation.
Appendix 3: Purple Guide information and other relevant materials

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Appendix 2

Requirement/Basis of Representation (see Letter of 12 th April 2019)	Authority	Compliance by Applicant 4640/4578&98	Representation for application 4640, and for 4578 &98 (unless stated otherwise) (a)	Relevance to Licensing Objectives (CD)(PN)(HC)(PS) and (ALL) ¹	Other observations by THFC
1. Procedural Requirements	(17) ²				
Application is subject to compliance with Regulations	(17(2))				
Form of Application Prescribed form used ✓	(54) Reg ³ . 10	✓			
Compliance with Regulations required by applicant and by Licensing Authority	Reg. 4 Reg. 6	X X	For the Reasons explained below, the Application submitted by the Applicant was defective and should not proceed to a Hearing. The ability for the application to be heard at a Committee Hearing is dependent on the requirements in Regulation 17 having first been met.	ALL The Licensing Act (and Regulations) set out the statutory framework with which compliance must be achieved. This is to ensure that the Responsible Authorities and Interested Parties (and the Licensing Committee) have sufficient information to adequately consider the application before them. Without the application being made in the correct form with the correct supporting documents, there can be no guarantee that any of the Licensing Objectives will be met.	The applications are seeking late licences (operating 22 hours daily) for large capacity crowd (10,000 to 40,000). One would expect full information have been provided to the Responsible Authorities and interested parties in advance of any formal application for permanent licences being made. THFC ⁴ has no confidence that on the scant information provided by the Applicant in both applications, the Licensing Objectives will be promoted. Without limiting the aforesaid, the Applicants have completely failed to explain how their proposed “Premises” will operate safely when a (bowl) Event is taking place at Tottenham Hotspur Stadium; at Alexandra Palace; at the London Stadium and/or at other event venues in the locality
Operating Schedule must accompany application		X	X The Operating Schedule lacks sufficient clarity – see Section 2 of this Representation	ALL Due to the paucity of information provided as to how this large capacity “venue” will operate there are concerns that none of the Licensing Objectives will be promoted	See comments to the left and Section 2 of Representation

¹ CD = Prevention of crime and disorder; PN= Prevention of Public Nuisance; HC = prevention of harm to children; PS – promotion of Public Safety.
All – means that the matter (and Representation) is relevant to all four Licensing Objectives

² All references in brackets are to the relevant section in the Licensing Act 2003

³ References to Regulations are to the Licensing Act 2003 (Premises Licences and Club Premises Certificates) Regulations 2005.

⁴ Tottenham Hotspur Limited and Tottenham Hotspur Football & Athletic Co Ltd

Appendix 2

Plan in Prescribed Form					
Plan in prescribed form must accompany the application	(17(3)(b))	The Applicant has failed to comply with Regulation 23(3) including 23(3)(a) to 23(d)	X The Plan lodged for each application lacks the information required by Regulation 23 and is illegible. It provides no details as to which proposed licensable activities are to be conducted where in the proposed Premises. It therefore also fails to comply with Regulation 23(3)(d)	ALL As the plan for each application is illegible, it is impossible to see from this how the proposed “Premises” could safely be assessed to be used for, or actually used for, any licensable activities let alone those involving large-scale capacity crowds of between 10,000 and 40,000. The Responsible Authorities on receipt of the plans will not be able to adequately assess whether the proposed “Premises” can be operated safely (not least as they will not be able to take measurements from the plan). For an application of this nature, involving large scale audiences, not only should clear plans have been lodged of the proposed Premises - but also proposed layout plans (showing probable stage positions; crowd-flow modelling; medical/first aid points etc). In view of the locality of the proposed “Premises” and particularly its locality to waterways – the Applicant should have lodged clear plans showing the position of the proposed Premises with reference to the waterways; the location of roads and bridges. Reference should have been made (in the Operating Schedule) as to how the Applicants will meet the recommendations of the Purple Guide – for example in relation to Venue Capacity paragraphs (see Appendix 3)	For an application of this nature, involving planned large scale audiences, not only should clear plans have been lodged of the proposed “Premises” - but also proposed layout plans (showing probable stage positions; crowd-flow modelling; medical/first aid points etc.) for likely Events in the licensed space. One would expect the various layout plans to be provided in advance of, or certainly with the LIC 2⁵ application so that they form part of the application and the Operating Schedule therein. Such detailed plans (showing what licensable activities are likely to take place where) are of crucial importance particularly where the proposed Site has no infrastructure in place to meet any of the usual requirements – to allow for the safe access/egress of crowds (including disabled guests); security measures; first aid and toilet provisions etc... No consideration appears to have been given in advance of making the application to the Event Safety Guide (the Purple Guide).
Prescribed form of Plan	Reg.23(1)	X	X The Plan is illegible and fails to show the prescribed information at Regulation 23 (3)	ALL – see above	See above
Contents of plan	Reg.23(3)	X	X See above comments	ALL – see above	See above

⁵ Any bold or underling in this representation is for emphasis only.

Appendix 2

Advertising of the Application⁶	(17(5))				
Newspaper	Reg.25(a)	✓			
Site Notices	Reg.25(b)	X	<p>X</p> <p>The Site Notices do not appear to have been erected in prominent positions. In particular the Site Notices for application(s) 4578&98 were poorly displayed (see photograph at Appendix 3). Whilst a Site Notice was erected at the entrance to the wooded area – there was no Site Notice at the exit to that area – although this would have been a logical, obvious place to put one.</p> <p>The effect of Section 17(5)(a)(ii) is that the advertisements must not only be in the prescribed form but they must be advertised “in a manner which is prescribed and is likely to bring the application to the attention of persons who live, or are involved in a business in the relevant licensing authority area and who are likely to be affected by it”.</p>	<p>ALL</p> <p>The manner in which the applications have been advertised is highly confusing. Even if the applications had come to the attention of local residents and businesses, it is highly likely that the residents and businesses may have been hampered in lodging representations due to the fact that the details of applications on the website do not match those advertised in the local paper and (partially) on site.</p>	
Information for notices	Reg.26(4)				
Advertising by Licensing Authority	S.17(5) (aa)	X	<p>X</p> <p>The Applications as advertised on the website by the Licensing Authority do not match the applications advertised in the local press or the Site Notices displayed by the Applicants. The Licensing Authority has advertised three applications whereas the Applicant has made two applications</p>	<p>ALL</p> <p>The manner in which the applications have been advertised is highly confusing. Even if the applications had come to the attention of local residents and businesses, it is highly likely that the residents and businesses may have been hampered in lodging representations due to the fact that the details of applications on the website do not match those advertised in the local paper and (partially) on site.</p>	
Determination of a Premises Licence application⁷	(18)				
Application must comply with sections 17 and advertising requirements (of Applicant and LA)	(18(1))	X	<p>X</p> <p>As the Applications have not been made in the correct form (in the sense of insufficient and contradictory information being given in the Operating Schedule; insufficient advertising of the applications and/or inadequate plans being lodged) the Licensing Committee has no jurisdiction to consider the applications at Committee.</p> <p>Section 18 only permits the Licensing Authority to determine any application for a Premises licence where the application was received by it in accordance with Section 17 and where it is satisfied that the Applicant has fulfilled the requirements stipulated by the Regulations.</p>	<p>ALL</p> <p>The manner in which the applications have been advertised is highly confusing. Even if the applications had come to the attention of local residents and businesses, it is highly likely that the residents and businesses may have been hampered in lodging representations due to the fact that the details of applications on the website do not match those advertised in the local paper and (partially) on site.</p>	

⁶ Reference should also be made to the Revised Guidance to the Act, paragraphs 8.80 to 8.87

⁷ Reference should also be made to the Revised Guidance to the Act, section 9

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The Licensing Authority's powers at a Hearing	(18(3))		<p>Note: If the Licensing Committee does hear the Applications, it only has the powers available to it as set out in section 18(3) LA 2003. In terms of granting any licence subject to conditions, those conditions must be "appropriate"</p> <p>The conditions proposed by the Applicants are inappropriate for the reasons articulated in this Appendix 2.</p>	<p>ALL</p> <p>The Operating Schedule set out by the Applicants is inadequate and inappropriate for the reasons set out in section 2 of this Appendix below.</p>	<p>The Operating Schedule set out by the Applicants is inadequate and inappropriate for the reasons set out in section 2 of this Appendix below.</p> <p>It is our submission that a Licence cannot lawfully be issued on the basis that there may (or may not) be future agreement of fundamental terms (relating to the four Licensing Objectives) with third parties, which may (or may not) then be treated as "conditions".</p> <p>Such conditions (based on an agreement to the Licensing Committee to agree with other third parties) would fall foul of s.18(4)(a)(i). Such assurances (contingent on reaching agreement with third parties) do not result in enforceable conditions.</p> <p>The Licensing Authority should only grant the Applications if it is entirely satisfied (on the information already forming part of the Operating Schedule) that the Applicant has provided evidence to demonstrate that it can promote all four Licensing Objectives at a large scale event, when the emergency services and Responsible Authorities may be committed to an existing licensed event elsewhere, in close proximity.</p>
Revised Guidance to Licensing Act 2003					
Compliance with Guidance	Para.1.16	X	Conditions on Premises Licences must be precise and enforceable; unambiguous and clear; must be tailored to the individual type location and	<p>ALL</p> <p>The information provided by the Applicant in its applications (section M) is imprecise; unenforceable; and</p>	Whilst the Applicants have set out various steps in section M of their

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			<p>characteristics of the premises and events concernedshould be capable of being met.....</p> <p>The conditions proposed by the Applicants are inappropriate for the reasons articulated in Appendix 2.</p>	<p>provides assurances (for example around the future involvement of SAG members and the future possible agreement of measures) which may or may not be capable of being fulfilled.</p>	<p>applications, in most instances those steps lack precision and/or refer to future discussion/agreements/ activities (which may or may not actually happen). For example assurances are put forward that numerous plans (for example relating to Traffic Management; Noise Management; Risk Assessment; Medical Management) will be “devised” or will “define” or “detail” the specifics but this does not provide any guarantee that the plans will a) be prepared to a satisfactory standard; b) taking into account matters relating to the Licensing Objectives; c) take into account the views of Interested Parties etc.....</p> <p>For large scale events, THFC are of the view that the Applicants should have prepared the various plans in advance of making their applications and should have circulated them to the Responsible Authorities. The Plans should have been available for inspection to Interested Parties at least to the extent that those Interested Parties will be impacted by the planned large scale events.</p>
	Para 2.7 to 2.9	X	<p>Licence Holders have a responsibility to ensure the safety of those using their premises....a number of matters should be considered in relation to public safety including the 8 items bulleted in para 2.8. Applicants should consider when making their application which steps it is appropriate to take to promote the public safety and demonstrate how they achieve that...</p> <p>The steps suggested by the Applicants are insufficient comprising a standard but incomplete list of common measures without consideration of the locality; other major events and/or how the steps can be codified into enforceable conditions.</p>	X ALL but specifically public safety	See above comments and further comments in Section 2
	Para 8.34	X	<p>Plans....must be in a format with is “clear and legible in all material aspects” i.e they must be accessible and provide sufficient detail for the licensing authority to be able to determine the application including the relative size of any features</p>	The plans submitted are illegible and lack any clear information (particularly, but not limited to, lack of detail	

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			relevant to the application. There is no requirement for the plans to be professionally drawn as long as they clearly show all the prescribed information.	around the external walls of the proposed “Premises”; and access/egress from the “Premises” See comments above in relation to failure to comply with Section 17 and Regulation 23 requirements	See comments to the left and further comments in Section 2 of Representation
	Para 8.41	X	In completing an Operating Schedule, Applicants are expected to have regard to the statement of licensing policy for their area. They must also demonstrate knowledge of their local areas when describing the steps they propose to take to promote the licensing objectives. Applicants are also expected to undertake their own enquiries about the area in which the premises are situated to form the content of the application. The steps suggested by the Applicants are insufficient comprising a standard but incomplete list of common measures without consideration of the locality; other major events and/or how the steps can be codified into enforceable conditions.	X ALL The Operating Schedules fail to take sufficient account of the Statement of Licensing Policy (see below) and fail to take any account of the fact that the Applicant is proposing large scale events in an area of considerable congestion, within a “stone’s throw” of large licensed Stadia and other Event spaces.	See comments to the left and further comments in Section 2 of Representation
	Para 8.42 to 8.7	X	These paragraphs set out various expectations of the Applicants prior to making or on making any application for a Premises Licence. These include (in summary only): <ul style="list-style-type: none"> • Providing sufficient information to demonstrate (when setting out steps they propose to take) that they understand the layout of the local area and physical environment including crime and disorder hotspots; risks posed to the local area by their proposed licensable activities... • How the Applicants will manage potential risks; • Through making local enquiries – consider all factors which may be relevant to the promotion of the Licensing Objectives • Providing Licensing Authorities with sufficient information (covering their applications) to determine the extent to which their proposed steps are appropriate to promote the licensing objectives in their area. The steps suggested by the Applicants are insufficient comprising a standard but incomplete list of common measures without consideration of the locality; other major events and/or how the steps can be codified into enforceable conditions.	X ALL The applications submitted by the Applicants fail to demonstrate that they have fulfilled any of the expectations set out in these paragraphs of the Guidance. Without limiting the aforesaid, the Operating Schedules fail to take sufficient account of the Statement of Licensing Policy (see below) and fail to take any account of the fact that the Applicant is proposing large scale events in an area of considerable congestion, within a “stone’s throw” of large licensed Stadia and licensed event spaces (such as Alexandra Palace)	See comments to the left and further comments in Section 2 of Representation
	Para 8.49	Xall Operating Schedules should be precise and clear about the measures that are proposed to promote each of the Licensing Objectives The steps suggested by the Applicants are insufficient comprising a standard but incomplete list of common measures without consideration of the locality; other major events and/or how the steps can be codified into enforceable conditions.	X ALL The Operating Schedules submitted are not precise and clear, but largely attempt to shift the responsibilities to promote the Licensing Objectives onto other parties (particularly members of a SAG). See further at section 2 of this Representation	See comments to left and further in Section 2 of Representation
	Para 9.39		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	X ALL	THFC are of the view that the steps proposed by the Applicants in section M of their applications are

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			<p>is merely aspirational.... Any conditions added to the Licence must be those imposed at the Hearing or those agreed when a hearing has not been necessary....</p> <p>The steps suggested by the Applicants are insufficient comprising a standard but incomplete list of common measures without consideration of the locality; other major events and/or how the steps can be codified into enforceable conditions.</p>	<p>It follows from Section 18 LA 2003 and from this paragraph in the Guidance that licence conditions can only be imposed by the Licensing Committee. A condition for third parties (e.g. SAG members) to agree terms to comprise a condition at some stage in the future is outside the powers of the Licensing Committee.</p>	<p>largely aspirational in the sense that the Applicants are stating that they will obtain the approval of fundamental operational plans from third parties (SAG). Such conditions are inappropriate and unenforceable, rendering any such conditions entirely useless. See Section 2 below</p>	
Enfield Council, Statement of Licensing Policy						
Compliance with Policy						
	Para 3.3	X	<p>Conditions attached to any Licence will focus on matters within the control of individual licensees and in the vicinity of the proposed Premises.</p> <p>The steps suggested by the Applicants are insufficient comprising a standard but incomplete list of common measures without consideration of the locality; other major events and/or how the steps can be codified into enforceable conditions.</p>	X ALL	X The conditions offered by the Applicants are not matters which are within their control – they are promising matters which the Applicants cannot control for example obtaining approvals from third parties such as SAG members. Such conditions are inappropriate and unenforceable.	
	Para. 8.3	X	<p>The Licensing Objectives should be paramount considerations at all times</p> <p>The scarcity of information in the operating schedules fails to demonstrate how in reality the LOS will be treated and enforced as paramount.</p>	X ALL	<p>The Applicants’ operating schedules contain insufficient information to demonstrate that they will ensure that the promotion of the Licensing Objectives at all times will be achieved. Assurances to enter into discussions and to seek third party approval are not sufficient to amount to enforceable conditions and thus the Licensing Objectives have not been treated as paramount. See further the comments in Section 2 of this Representation</p>	See comment to the left and in Section 2 of this Representation
	Para. 9.8	X	<p>The local authority and Police are under a duty to do all they reasonably can to prevent crime an disorder in their area.</p>	X ALL	<p>See comments to the right. It follows from the lack of approval operational plans that the Local Authority and Police are not in a position to meet this duty.</p>	<p>THFC are of the view that in failing to provide sufficient operational information to the Police and to the various Responsible Authorities (and including information relating to approved operational plans in their operating schedules) in advance of making the formal applications, these Authorities cannot fulfil their</p>

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					duty as stipulated in paragraph 9.8 of the Statement of Licensing Policy.
	Para. 11.1	X	<p>An Operating Schedule is submitted with a Licence Application and contains the information required by section 17(4). Among other things, it includes the steps that the Applicant proposes to take to promote the Licensing Objectives.</p> <p>Where a risk to the Licensing Objectives is present, the Council expects applicants to specifically address in their operating schedules how they will meet the Special Factors for Consideration.</p> <p><i>The scarcity of information in the operating schedules fails to demonstrate how in reality the LOS will be treated and enforced as paramount.</i></p>	<p>X ALL</p> <p>See comments to the right and specifically in Section 2 of the Representation below. The Applicants have failed to particularise the means by which they will meet the Special Factors for Consideration in the Statement of Licensing Policy. These Special Factors go to all four Licensing Objectives.</p>	THFC are of the view that in failing to provide sufficient operational information to the Police and to the various Responsible Authorities (and including information relating to approved operational plans in their operating schedules) in advance of making the formal applications, these Authorities cannot fulfil their duty as stipulated in paragraph 9.8 of the Statement of Licensing Policy.
	Para 12 – 12.2.1 to 12.4.7	X	<p>Special Factors for Consideration.</p> <p>The “means” by which each of the Licensing Objectives will be promoted must be detailed in the Operating Schedule.</p> <p><i>The steps suggested by the Applicants are insufficient comprising a standard but incomplete list of common measures without consideration of the locality; other major events and/or how the steps can be codified into enforceable conditions.</i></p>	<p>X ALL</p> <p>See comments to the right and specifically in Section 2 of the Representation below. The Applicants have failed to particularise the means by which they will meet the Special Factors for Consideration in the Statement of Licensing Policy. These Special Factors go to all four Licensing Objectives.</p>	THFC are of the view that in failing to provide sufficient operational information to the Police and to the various Responsible Authorities (and including information relating to approved operational plans in their operating schedules) in advance of making the formal applications, these Authorities cannot fulfil their duty as stipulated in paragraph 9.8 of the Statement of Licensing Policy.
	Para. 12.2.4	X	<p>This paragraph specifically provides that to promote Public Safety, the Applicants should provide “the means by which risk to public safety will beprevented by effective management and operation of the licensed activities including ...the adequacy of transportation arrangements to ensure that customers may safely travel to and from the premises and nuisance is avoided by concentrations of people unable to access transport in a timely manner”</p> <p><i>The steps suggested by the Applicants are insufficient comprising a standard but incomplete list of common measures without consideration of the locality; other major events and/or how the steps can be codified into enforceable conditions.</i></p>	<p>X ALL but specifically public safety</p> <p>See comments to the right. It is incumbent on the Applicant to satisfy the Licensing Committee and Responsible Authorities (and Interested Parties) that it could operate a large scale event on any day of the week when other large scale licensed events will be taking place at other venues which already have the benefit of Premises Licences and in some cases GSCs⁸.</p> <p>In simple terms the Applicants have completely failed to articulate in their application/Operating Schedule how they will ensure the safe transportation of between 10,000 and 40,000 from their proposed “Premises” when the local transport infrastructure is already fully utilised by licensed events in the vicinity.</p>	<p>No details have been provided by the Applicants as to how they intend to run safe events at the proposed premises when existing licensed events are taking place at neighbouring large venues including the Stadium; London Stadium; Alexandra Palace etc....</p> <p>Transport Plans relating to the operation of Tottenham Hotspur Stadium (and no doubt similar plans are in place for the operation of London Stadium) as part of their GSC. These plans have been approved by the Authorities</p>

⁸ GSC = General Safety Certificate

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					following considerable consultation and planning. They have been approved and adopted and are now operational.
2. Operating Schedule Deficiencies					
			<p>X Regulation 17(4); the Guidance to the Act and Enfield Council’s Statement of Licensing Policy all set out requirements regarding the contents of the Operating Schedule. These requirements are to ensure that the level of detail in the Operating Schedule is sufficient to enable the Responsible Authorities to fulfil their duties; to enable Interested Parties and/or Other Persons to consider what is planned, and ultimately to enable the Licensing Committee to consider whether sufficient measures have been offered to ensure that the Licensing Objectives (which are of paramount importance) will be promoted if the licence is issued.</p> <p>The Operating Schedules lodged by the Applicants are deficient as they lack the required detail. For example (but not limited to):</p> <p>Application for Meridian Water, Units 4, 5, 6 6a & b:</p> <ul style="list-style-type: none"> • The general description of the proposed premises is devoid of detail for example it provides no information about the size of the 4 or 5 units; where they are positioned in the overall site; whether the proposed “Premises” includes any outside space; whether the Units are single-storey • The assurance that a “detailed plan of each event” will be provided to the Responsible Authorities is meaningless – to whom at the Responsible Authorities; when will it be provided; what happens if the Responsible Authorities are unhappy about the contents of the plan? • The Application refers to the above Units but promotional materials identify different Units – See information at Appendix 3. • The Operating Schedule is devoid of any meaningful detail relating to each of the following proposed licensable activities: Plays – proposed to take place from 08:00 to 06:00 daily; • States that the activity will take place daily for 22 hours a day; 	<p>X ALL</p> <p>General Principles</p> <p>THFC’s representation in relation to the matters set out in this section are essentially on the basis that the Applicant has failed to give sufficient detail in its Operating Schedule of its intended operation let alone of the measures that will be implemented to promote the Licensing Objectives.</p> <p>The paucity of information in the Operating Schedule is obvious with the Applicant essentially stating that because the Units are not fitted out as suitable licensed premises (with bar locations; audience spaces; staging; lighting; clear access and egress points etc...) all the information will follow. In our view this approach is irresponsible and provides no details on which the Responsible Authorities or Licensing Committee could be satisfied that the planned licensable events will be conducted in a manner that promotes the Licensing Objectives.</p> <p>The lack of detail in the Operating Schedule is all the more concerning when the Applicants have already promoted and sold tickets to a large capacity Event – Field Day – in June 2019 (see Appendix 3). Arranging such an Event without first preparing the necessary operational plans (including those relating to Noise Management; Emergency Contingency Plans; Transportation; etc) and entering into full consultation with the Responsible Authorities and relevant Other Persons (such as THFC and operators of other major licensed venues in close proximity), appears incredible. If</p>	

			<ul style="list-style-type: none"> • States that the activity indoors and outdoors but no outdoor space is identifiable from the plan submitted with the application; • No information is given relating to where in the Units the Plays will take place; the position of any staging; audience profile/numbers; • No information is provided relating to operational details <p>Films – proposed to take place from 08:00 to 06:00 daily:</p> <ul style="list-style-type: none"> • States that the activity will take place daily for 22 hours a day; • States that the activity indoors and outdoors but no outdoor space is identifiable from the plan submitted with the application; • No information is given relating to where in the Units the films will be shown; the position of any screens; audience profile/numbers; • No information is provided relating to operational details. <p>Indoor Sporting Events – proposed to take place from 08:00 to 06:00 daily:</p> <ul style="list-style-type: none"> • States that the activity will take place daily for 22 hours a day; • No information about the likely nature of the sport; • No information is given relating to where in the Units the sport will take place; the position of any sporting equipment; audience profile/numbers; • No information is provided relating to operational details <p>Boxing or Wrestling – proposed to take place from 08:00 to 06:00 daily:</p> <ul style="list-style-type: none"> • States that the activity will take place daily for 22 hours a day; • States that the activity indoors and outdoors but no outdoor space is identifiable from the plan submitted with the application; • No information is given relating to where in the Units boxing/wrestling make take place; audience profile/numbers; • No information is provided relating to operational details <p>Live Music – proposed to take place from 08:00 to 06:00 indoors daily/9:00 to 22:30 outdoors daily:</p> <ul style="list-style-type: none"> • States that the activity will take place daily indoors for 22 hours a day; outdoors for 13.5 hours daily; • States that the activity indoors and outdoors but no outdoor space is identifiable from the plan submitted with the application; • No information is given relating to where in the Units the activity will be conducted; the position of any staging or other demountable structures; audience profile/numbers; • No information is provided relating to operational details including no agreed Noise Management specifics. 	<p>those plans are in existence, they should have been provided as part of the application. Such plans are all the more important where the proposed “Premises” does not have the infrastructure (managerial or operational) for putting on events involving licensable activities.</p>	
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			<p>Recorded Music – proposed to take place from 08:00 to 06:00 indoors daily/9:00 to 22:30 outdoors daily:</p> <ul style="list-style-type: none"> • States that the activity will take place daily indoors for 22 hours a day; outdoors for 13.5 hours daily; • States that the activity indoors and outdoors but no outdoor space is identifiable from the plan submitted with the application; • No information is given relating to where in the Units the activity will be conducted; the position of any staging or other demountable structures; audience profile/numbers; • No information is provided relating to operational details including no agreed Noise Management specifics. <p>Dance (and similar activities to music and dance) – proposed to take place from 08:00 to 06:00 daily:</p> <ul style="list-style-type: none"> • States that the activity will take place daily for 22 hours a day; • States that the activity indoors and outdoors but no outdoor space is identifiable from the plan submitted with the application; • No information is given relating to where in the Units Dance performances will take place; the position of any staging; audience profile/numbers; • No information is provided relating to operational details or agreed noise management measures (if any) <p>Late Night Refreshment – proposed to take place daily from 23:00 to 05:00</p> <ul style="list-style-type: none"> • States that the activity indoors and outdoors but no outdoor space is identifiable from the plan submitted with the application; • No information is provided relating to operational details <p>Sale of Alcohol – proposed to take place from 08:00 to 06:00 daily:</p> <ul style="list-style-type: none"> • States that the activity will take place daily for 22 hours a day; • States that sales will be for consumption on and off the Premises; • No information is given relating to where in the Units bars will be situated; • The likely nature of any on or off sales. <p>Opening Hours: 08:00 to 06:00 daily:</p> <ul style="list-style-type: none"> • States that the Premises will be open daily for 22 hours a day. <p>Section M – Steps to promote the Licensing Objectives is deficient as:</p> <ul style="list-style-type: none"> • The plans listed in Section M(A) (1) are not in existence and assurances to provide appropriate plans are insufficient. If paragraph (1) is intended to be a condition on the licence it would be meaningless and unenforceable. • M(A)(3) – is unclear as suggests that for some events the capacity will not be limited to 9,999 (inclusive of staff and performers); 		
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			<ul style="list-style-type: none"> • M(A)(7) – this is vague – the applicant failing to identify numbers of door supervisors depending on capacity of event and risk assessment level; who will conduct the Risk Assessment; the form of Risk Assessment; the search policy that will apply depending on Risk etc... • M(A)(9) – The “operational plan” referred to herein does not appear to be available; the crowd management plan also appears to be aspirational. • M(A)(10) – Transport Options – this fails to demonstrate any understanding of the locality and in particular existing pressures on the transport infrastructure. • M(A)(18) – This suggested condition relating to CCTV is not sufficiently precise; • M(A)(19) – This suggested condition is vague and unenforceable; it is unclear whether a “transport statement” exists but it was not served with the application and does not form part of the Operating Schedule. • M(A)(22) – Event “Overview” – this suggested condition is vague and meaningless. The Responsible Authorities cannot be expected to manage the licensed premises; • M(A)(24) – This is a vague and unenforceable condition ; • M(A)(26) - This is a vague and unenforceable condition; • M(A)(27) to (32) These are vague and unenforceable condition, as they fail to identify who is responsible for compliance and/or refer to non-existent plans. • M(A)(36) This is vague and unenforceable as no Venue Operational Plan has been made available. • M(A)(37) This condition is inappropriate and unenforceable – see general principles. <p>Application for Meridian Water, Units 4, 5, 6 6a & b, and Land to the south of Units 4, 5, 6, 6a and 6b:</p> <ul style="list-style-type: none"> • As this application is virtually identical to the “Units only” application, the bullets listed above are repeated in their entirety as applicable to this “Festival Licence” application – save that the plan submitted in support of this application does include outdoor space. • In addition: <ul style="list-style-type: none"> • The general description is equally vague. Mention is made of “warehouses” rather than “Units”; again no details are given as to the size of the “warehouses” or whether they are one/two storeys; • The suggestion that the proposed “Premises” is suitable for 25,000 (let alone 40,000) is not supported by information in its Operating Schedule; • Again a “detailed layout plan” showing details “will be provided” and this will apparently be “agreed through the SAG progress”. This is entirely inappropriate for the reasons set out in section 3 below. 	<p>X ALL</p> <p>General Principles</p> <p>THFC’s representation in relation to the matters set out in this section are essentially on the basis that the Applicant has failed to give sufficient detail in its Operating Schedule of its intended operation let alone of the measures that will be implemented to promote the Licensing Objectives.</p> <p>In simple terms the Applicant is proposing that it will put on festivals and similar events with initially 25,000 people but then increasing to 40,000, subject only to obtaining approval from a SAG. For the reasons set out in Section 3 below, this submission is fundamentally flawed as the purpose of a SAG is not to approve events; nor to</p>	
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			<p>Section M – Steps to promote the Licensing Objectives is deficient as</p> <ul style="list-style-type: none"> • The proposal that “the running of the festival and/or large scale events and licensing requirements will be approved by a formal SAG process” is inappropriate and unenforceable. See General Principles and Section 3 below. • For the same reasons, it is a fallacy to submit that any “EMSP” or any of the Plans listed in M(b)(1(a) to (i) will be subject to “the requirements of the Licensing Authority and the Enfield Safety Advisory Group”; In relation to the former – the Licensing Authority does not have powers to approve or disapprove arrangements after a licence has been granted. The SAG has no authority to approve or disapprove operational plans provided by the Applicant. • M(b)(2) – Again this is inappropriate and/or vague – there being no defined SAG “process” and a SAG being only advisory in nature. • M(b)(4) This proposed condition is valueless as it is based on conditions which are in themselves unenforceable; • M(b)(9) to (13), (18), (19) are a repetition of the proposed conditions in relation to the “Units only” application so the comments made in opposition are equally applicable to this application. • M(b)(22) –The suggested condition regarding consulting with THFC (in view of the proximity of Tottenham Hotspur Stadium “to collaboratively manage events is vague; meaningless and unenforceable. • M(b)(23) – This is a vague and unenforceable condition as it appears the the Crowd Management Plan or the Drugs Policy are not yet in existence. • M(b)(26) - This is a vague and unenforceable condition • M(b)(27) - This is a vague and unenforceable condition as the Safety Advisory Group is not in a position to agree (or disagree) the measures proposed by the Applicants. • M(b)(28) and (29), (32) to(37) - These proposed steps are vague would not be enforceable condition, as they fail to identify who is responsible for compliance and/or refer to non-existence plans. • M(A)(42) This condition is rendered ineffectual as the Event Management and Safety Plan has not been provided and any EMSP that is developed 	<p>stipulate licensing requirements. Any SAG is an advisory group and it has not powers (and it is not its role) to stipulate licensing conditions – that is the role of the Licensing Committee</p> <p>See above comments</p> <p>Tottenham Hotspur Stadium, London Stadium; Alexandra Palace and other major venues in close proximity to the proposed “Premises” already have the benefit of Premises Licences (and in some cases General Safety Certification). The Applicants cannot proffer conditions which involve third parties over whom they have no control. It is for the Applicants to satisfy the Licensing Committee that they can operate their licensed premises without negatively impacting on the community including those licensed premises which have had to go through the process of obtaining suitable licences for their respective operations.</p>	
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			through the SAG as suggested by the Applicants is incapable of being “approved” and of being an enforceable condition on the licence.		
3. Inappropriate Usurpation of powers from Licensing Authority to SAG					
	(s.4) (s.5)		<p>Both applications made by the Applicants are devoid of sufficient detail (as set out in the Operating Schedules) to enable the Responsible Authorities and the Licensing Committee to properly assess whether the proposed large scale events (involving a maximum of 40,000 people) could take place without negatively impacting on the Licensing Objectives.</p> <p>It is the Licensing Committee (or Licensing Authority under delegated powers, where applicable) that has the power to grant a licence subject to conditions. Conditions cannot be developed by third parties after the event (i.e. at some stage in the future post issue of the Licence) and “slotted into” the conditions on the Licence.</p> <p>The Applicants by repeatedly suggesting that various operational and management plans will materialise (post issue of a Premises Licence) following the “agreement” with SAG are attempting to usurp the function of the Licensing Committee. It is the Licensing Committee that must carry out its functions under the Licensing Act 2003 with a view to promoting the licensing objectives. In carrying out its duties the Licensing Authority must also have regard to its own Licensing Statement and the Guidance under the Licensing Act 2003.</p>	X ALL	

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4. Inappropriate delegation of operational responsibilities by Applicant to SAG					
			<p>In summary the Applicants are inviting the Licensing Committee to issue two licences for ill-defined “Premises”, for large capacity audiences (up to 40,000) on assurances that operational and management plans will follow and will be subject to the approval of a SAG. This approach is fundamentally flawed for the reasons already set out above.</p> <p>SAG does not have the power to approve plans or to stipulate that certain steps will become licence conditions. At best, the applications suggest a misunderstanding of the powers of a SAG; at worst, they risk being viewed by Interested Parties as an attempt to obtain wide-reaching; late licences for large capacity events “through the back door”.</p> <p>SAG’s are advisory and have no legal status. Further there is a dearth of information even about the SAG that the Applicant is proposing be involved, in the future, as proposed in its applications. No information has been provided concerning the proposed terms of reference for the SAG or who the core membership of the SAG is likely to comprise. No information has been adduced to demonstrate that the proposed core member of the SAG have agreed to be part of it. From the scarcity of information provided by the Applicant, there is no evidence to demonstrate that they have considered the recommendations in the Purple Guide⁹ (section 25) or similar publication concerning the role of SAGs.</p>	<p>X ALL</p> <p>The scarcity of information in the operating schedules fails to demonstrate how in reality the LOS will be treated and enforced as paramount.</p> <p>The steps suggested by the Applicants are insufficient comprising a standard but incomplete list of common measures without consideration of the locality; other major events and/or how the steps can be codified into enforceable conditions.</p>	<p>No disrespect to SAG’s is intended; they carry out an incredibly value role in providing guidance to event operators.</p> <p>However, it is highly inappropriate to advance that operational and/or management plans will be approved by SAG’s. The ground/venue/“Premises” management is responsible for formulating their plans. Where the premises do not need to obtain a GSC, those plans should, in our view, be in existence in advance of any Premises Licence being sought.</p>
5. Failure to establish that the Licensing Objectives will be promoted					
			<p>Without fully articulated plans supporting the Licensing Objectives having been produced in advance of the applications, upon which the Responsible Authorities have had time to reflect, all four licensing objectives will inevitably be negatively impacted as a result of the proposed large scale licensable events at the proposed “Premises”. Where there is a lack of infrastructure supporting licensable activities the Applicant is under a greater obligation to ensure that its Operating Schedules provide a detailed framework – confirming what processes have already been developed to ensure that the Licensing Objectives are promoted.</p>	<p>X ALL</p> <p>The scarcity of information in the operating schedules fails to demonstrate how in reality the LOS will be treated and enforced as paramount.</p> <p>The steps suggested by the Applicants are insufficient comprising a standard but incomplete list of common measures without consideration of the locality; other major events and/or how the steps can be codified into enforceable conditions.</p>	

⁹ The Purple Guide - section 25 – Working in a Safety Advisory Group – see also Appendix 3.

Appendix 2

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Appendix 3:

1. Extracts from the Purple Guide
2. Photographs of Site Notices
3. Promotional materials relating to different "Premises"

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3. Venue & Site Design

3. Venue & Site Design

 07 March 2014  27 March 2019



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Please note: The information contained in this guide provides pointers to legislation and good practice that should be considered by event organisers. However, it is industry guidance and does not necessarily cover everything that organisers need to consider for a particular event.

KEY POINTS:

- Carry out a site-suitability assessment early in the planning process
- In that assessment, include the nature of the event, audience numbers and the infrastructure required
- Design the site layout to minimise risk, for example to segregate pedestrians and vehicles
- Identify a Principle Designer and Principle Contractor under CDM Regulations 2015
- Prepare a site and area location plan
- Establish emergency routes
- Liaise with key stakeholders, such as landowners, the local authority, local emergency services, neighbouring businesses and local residents

3.1 The general principle behind venue design is to provide an arena or location in which the audience can enjoy the entertainment in a safe and comfortable atmosphere, and to ensure that the health, safety and welfare needs of the workforce are also met.

3.2 The detail and complexity of the site and facilities will depend on the nature of the entertainment planned, the audience profile, the location, size of the event, the time of year (weather) and duration of the event. The site design will also need to take account of the existing geographical, topographical and environmental infrastructure.

3.3 The inflexibility of some fixed venues may limit the event layout and design as they are often built with another use in mind, e.g. football. The event will create new hazards and risks and there may be specific venue requirements to consider in addition to those referred to below. Venue management will be able to give advice about these.

3.4 This chapter gives an overview of the site-design process and highlights key safety factors that an event organiser should consider. Other chapters expand on many of the highlighted factors.

Knowing the event

3.5 It is essential to understand what the event is and what is involved in it. The size and nature of an event can vary greatly, as do the venues and sites in which they take place, so it is important to have fully considered:

- what is it that is being organised and what is involved in terms of entertainment and infrastructure?
- where is it taking place and how will the characteristics of the site and its location affect the event?
- when does the event take place and what impact will the time of year have on the site and/or activities?
- who will be attending, both in terms of the number of people and their characteristics, as well as how will their anticipated behaviour affect how the site is designed?

Pre-site design data collection

3.6 Properly knowing and understanding the event and its audience is an important precursor to successful site design (see Chapter 13 (</index.php/the-purple-guide/93-13-crowd-management>) on Crowd Management). It means having a detailed grasp of a range of factors including:

- duration and time of year that the event will take place
- the proposed event activities and whether they are indoors or outdoors
- the audience type/profile for these activities
- whether the audience will be standing, seated or a mixture of both
- the proposed audience capacity
- the circulation of the audience within the site
- access onto and around the site
- the structures and facilities that will be required
- workforce to support the event and breakdown
- emergency plans for these aspects of the event

Example: The Audience Profile

- Knowing the audience profile will help in the effective design of the site to ensure the crowd can be managed safely
- Gather information about the audience in terms of age profile, gender ratio and expected behaviour pattern
- An audience for an antiques fair will be different from a rock concert; family groups will behave differently from non-family groups
- Depending on the profile, tailor facilities to the needs and behaviour of the audience. For example, the sale of alcohol at an event can affect the audience profile and behaviour – the bar area might need to be in a separate, controlled area

Find more advice about audience profiling in The Purple Guide Chapter 13 (</index.php/the-purple-guide/93-13-crowd-management>) on Crowd Management

Assessing site/venue suitability

3.7 Once a clear understanding of the event concept has been established, a visit to the venue or site to carry out a preliminary assessment will determine its suitability. The factors to consider include:

- available space
- viewing space – this can be enhanced by use of video screens
- traffic and pedestrian routes, and emergency access
- ground conditions
- position and proximity of noise-sensitive buildings
- geographical location
- topography
- location and availability of services.

3.8 Obtaining a plan of the site should be an early step. Try and get one to the best quality and the best scale available.

3.9 It is essential to walk the site at different times, study maps and seek advice from landowners and users.



Venue capacity/available space for the audience

3.10 The capacity of a venue generally depends upon the available space for people (the audience, staff and contractors), taking account of the event infrastructure/temporary structures, the number of emergency exits and the sight lines for the audience to view the entertainment.

3.11 Emergency exits and circulation capacity are limiting factors in capacity calculations, and should be included in the Risk Assessment. Others include:

- accessibility to the site in terms of transport and parking
- times the site is open to the public
- number of entrances
- the expected flow rate through the entrances, which in turn is impacted by security considerations around searching of individuals.

3.12 In the audience capacity flow chart, figure 1 below, the S and P factors are control calculations identified in The Guide to Safety at Sports Grounds (The Green Guide) (<http://www.safetyatsportsgrounds.org.uk/sites/default/files/publications/green-guide.pdf>) and determined by risk assessment. In order to calculate the holding capacity, each part of the venue's viewing accommodation should be assessed according to its physical condition. This assessment is known as the (P) factor. Similarly, each part of the venue's viewing accommodation should be assessed according to the quality of the safety management of that area. This assessment is known as the (S) factor.

NOTE. As stated in the Safety at Sports Grounds (The Green Guide), the mandatory discounting of an exit may be unreasonable, particularly in the case of events held in Stadiums where the pitch is used as a viewing area, need for discounting an exit should be evaluated in accordance with the risk assessment and fire risk assessment.

3.13 The rates of escape that are recommended are those in The Guide to Safety at Sports Grounds 5th edition (The Green Guide)

(<http://www.safetyatsportsgrounds.org.uk/sites/default/files/publications/green-guide.pdf>) published by DCMS. These are based on BS EN 13200-1:2003, which advises that, for a width of 1.2m:

a. on a stepped surface 79 people can reasonably exit in 1 minute (equal to 66 spectators per metre width per minute)

b. on a level surface 100 people can reasonably exit in 1 minute (equal to 82 spectators per metre width per minute)

3.14 Higher evacuation rates should only be used if specifically justified by the event risk assessment. The risk assessment should also take into account other significant factors in the audience profile, including behavioural matters such as alcohol and drugs and physical matters, such as the presence of child buggies/prams.

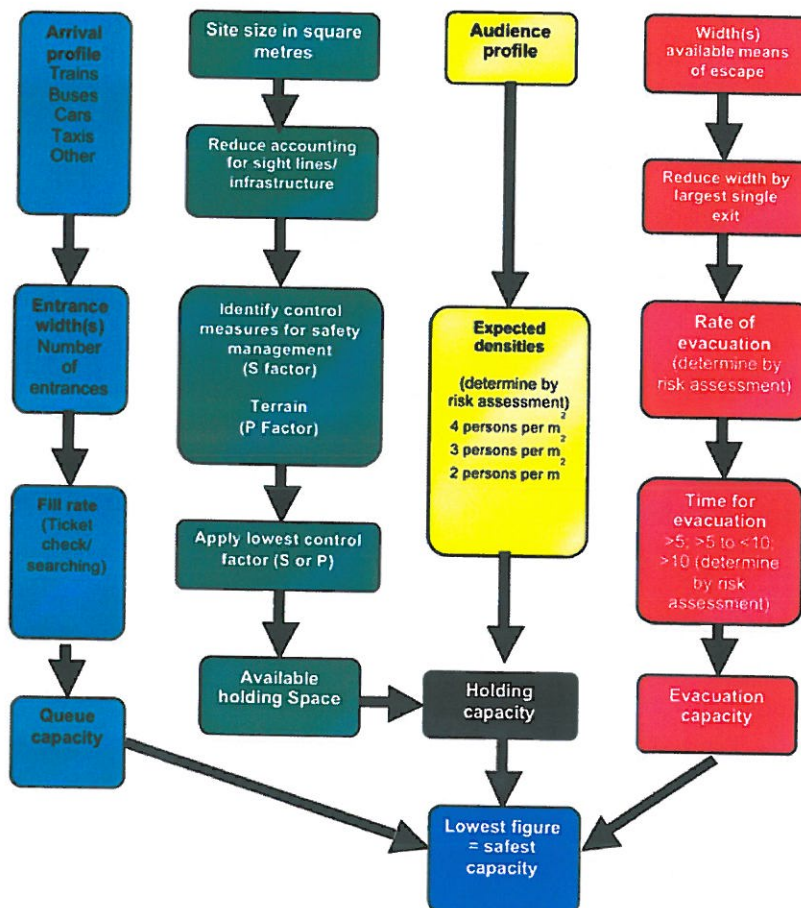


Figure 1: Audience capacity flow chart

Roads and bridges

3.15 Ensure any roads and bridges to the site are structurally sound and able to withstand the additional load of heavy vehicles and potentially large numbers of people at the construction and dismantling periods as well as event days. For further information, see Chapter 7 (</index.php/the-purple-guide/99-7-transport-management>) on Transport Management. You should also pay attention to Construction and Design Management Regulations that are applicable to the events industry. For more information see <http://www.hse.gov.uk/construction/cdm.htm> (<http://www.hse.gov.uk/construction/cdm.htm>)

3.16 Identify any bridges on site in the safety plan, and highlight those that are key to ingress and egress or are needed as emergency service routes. Ensure they too have clearance or loading required.

Local amenities

3.17 Assess the site's proximity to a hospital, fire station, public transport, parking, major roads, and local services and facilities.

3.18 Among other things, the location will influence the level of services required to make the event safe, for example, water, sewage, gas, electricity.

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25. Working in a Safety Advisory Group

25. Working in a Safety Advisory Group

📅 11 May 2015 ⌚ 27 March 2019



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Please note: The information contained in this guide provides pointers to legislation and good practice that should be considered by event organisers. However, it is industry guidance and does not necessarily cover everything that organisers need to consider for a particular event.

Key Points:

Whilst this chapter will inevitably be beneficial to members of Safety Advisory Groups, it is also intended to be a useful source of reference for event organisers and others who may work with such groups in relation to their own, or others', events.

- **While SAGs are advisory and have no legal status, they are considered good practice;**
- **It is important to establish the terms of reference for a SAG;**
- **It is important to ensure that members of a SAG are competent and appropriate;**
- **SAGs can operate without necessarily holding meetings**

25.1 Safety Advisory Groups (SAGs) have been in existence for many years, to some extent as a consequence of the recommendations of Lord Justice Taylor following his inquiry into the Hillsborough Tragedy of 1989. Whilst this encouraged the establishment of SAGs in relation to football it was also recognised that there are also potential advantages in terms of SAGs for a broad range of other events.

25.2 In the absence definitive guidance a variety of approaches have developed with consequent inconsistencies.

25.3 Forming and retaining the SAG is not a legal requirement. However, they are considered a good practice, as recommended in several national guidance documents.

25.4 A SAG may be formed in relation to a specific event, a venue or with a broader remit in relation to a range of events. In either case, it is important to ensure that a 'constitution' exists which sets out clearly the roles and responsibilities attaching to it, the membership and the policies which may underpin how it is to function.

25.5 What should be vital is to ensure that a quality assurance process is in place in terms of the safety arrangements for events. Whilst there may be alternative means of achieving this, such as third party or peer review, the option of having a SAG comprising competent individuals scrutinising the safety arrangements must be the preferred option.

Terms of Reference

25.6 An important element of the constitution will be the terms of reference. These should accurately reflect the key role of providing a quality assurance advisory process for the safety related aspects for any event(s) and venue(s) falling within this role. It is stressed that the functions of this group should be distinct from the planning group for such events, and indeed it should not be confused with the arrangements for the management of the event(s). It should also not be used as a process for the authorities to enforce their statutory powers

25.7 Agreeing these terms of reference is a matter for local determination. However, the following examples may assist in this process. These may be either generic or specific according to the nature of the role at this local level. Generic terms of reference may include:

- To promote clarity of roles and responsibilities relevant to the event(s) within the SAGs remit;
- To advise the local authority and/or event organiser in order to ensure high standards of health and safety;
- To promote the principles of sensible risk management in safety and welfare planning;
- To promote a consistent and co-ordinated, multi-agency, approach to event planning and management;
- To advise the local authority and/or event organiser with regard to forming appropriate contingency and emergency arrangements;
- To advise the local authority and/or event organiser in respect of relevant legislation and guidance;
- To encourage arrangements to be made to minimise disruption to local communities;
- To consider the implications of significant incidents and events relevant to their venue (s) and events;
- To consider the implications of significant incidents and events relevant to the surrounding areas and facilities;
- To receive reports relevant to debriefs, visits and/or inspections of the venue or event.
- To consider an event in the context of other events that may be happening at the same time and any potential cumulative or combined impact

In some cases it will be relevant to consider specific terms of reference in addition to these generic examples. These may include:

- To advise the local authority with regards to its functions in relation to safety certification;
- To advise the local authority with regards to its powers under the licensing legislation.

25.8 In some cases it has been determined that a SAG will only consider certain categories of event, such as those on local authority land. Of course, the reality is that this could preclude consideration of other events, which may involve higher levels of unrecognised risk.

Membership Of The Safety Advisory Group

25.9 In his report, Lord Justice Taylor refers to statutory, non-statutory and invited members of a SAG. For the purpose of this guidance, however, only core and invitees will be considered. A core member can be expected to attend all meetings and all agenda items whereas an invitee may only be expected to be involved in respect of specific events, meetings or agenda items.

25.10 It is extremely important to ensure that the representatives and members of a SAG are credible, competent and of an appropriate position within the organization they represent. It will also be crucial for relevant organisations to be represented if suitable and sufficient review of an event proposal is to take place.

25.11 Core membership of a group is likely to include:

Local Authority (may be at County, District/Borough, Metropolitan and/or Unitary levels - this could include Licensing, Environmental Health or others as determined appropriate on a local basis)

- Building Authority
- Police Service
- Fire and Rescue Service
- Ambulance Service

25.12 Invited members may include:

Other local authority representatives as deemed appropriate (this could include Event Team, Emergency Planning, Highways, Health and Safety)

- Event organisers/promoters
- Venue owner/operator
- Health representatives
- Stewarding/security
- Traffic/transport providers
- British Transport Police
- Maritime and Coastguard Agency
- Harbour Authorities
- Medical/first aid providers

- Resident/community representatives
- Highways Agency
- Crowd safety managers

(Note: These are not intended to be exhaustive lists)

Chairing Of The Safety Advisory Group

25.13 It is most common, though not exclusive, for the Chair of a group to be a local authority appointed representative. In some cases it has been determined that they should be an independent appointee. What is vital, if the group is to function effectively and efficiently, is to have someone with the appropriate skills and competencies for this potentially demanding role. These are likely to be more focused upon competencies in communication, diplomacy and interpersonal criteria rather than detailed legal or subject matter knowledge.

25.14 The Chair should be able to absorb and evaluate the detailed arrangements for events whilst maintaining an objectivity of approach taking into account the views of the group members.

25.15 In many situations a SAG, chaired by a local authority representative, may be considering the arrangements for one of their own events. In such cases it is important to be able to demonstrate a transparency in the groups' processes. It would be appropriate to avoid suggestions of bias, by the Chair declaring a conflict of interest if necessary, in order to avoid such allegations. As already suggested some have recognised the benefit of appointing an independent chair, possibly from another authority.

25.16 Key responsibilities for the Chair of a SAG will include:

- Ensuring that the group discharges its responsibilities fairly, effectively and proportionately
- Ensuring, where practicable, appropriate representation on the group
- Ensuring that all members have an opportunity to participate
- Ensuring that an audit trail of group processes is maintained

Policy to Underpin Safety Advisory Group Procedures

25.17 There can often be a fine line between what might be deemed to be part of the terms of reference and what could, perhaps, be better regarded as an underpinning policy. It will be appropriate to consider the terms of reference to be focussed upon what a SAG does, the policy may be deemed to be more about how this is done. Such a policy may consider:

- It is the policy of this Safety Advisory Group to, so far as reasonably practicable, offer advice in order to ensure the highest possible standards of public safety at events and to encourage the wellbeing of those that could be affected by such events. In this context this could include those attending the event, but also those in the surrounding areas that may be affected by the impact of it.
- The Group is not responsible for review of safe systems of work of event organisations/crews. However, it will be relevant to consider the consequences of work related incidents during periods of public access.
- The Group does not make any decisions on behalf of the local authority as its role is advisory and as such it has no authority to either approve or ban events.
- The decision-making authority is typically delegated to the local authority possibly via the Chair of the Safety Advisory Group. Where other agencies may exercise their own statutory decision-making authority, it is stressed that this is the determination of that authority and not the Safety Advisory Group.
- The overall responsibility for the safety of persons at an event will lie with the event organiser, venue owner/operator and management team.
- Members of the Safety Advisory Group must declare any material conflict of interest in relation to any matters put before the Group, prior to any discussion on that matter. Should this interest be considered prejudicial, then that person should consider withdrawing, to be replaced by an appropriate party agreed with the Group.
- The Group will have arrangements to ensure that appropriate records of procedures and meetings are maintained.
- The lessons learned via the Group's processes and procedures will be applied for the benefit of all events within its area of responsibility.

When should a Safety Advisory Group consider an event?

25.18 This has been an area where there have been high levels of inconsistency between SAGs. Some have determined, for instance, that they will only consider events on local authority land, whilst others will have a broad variety of criteria. Many will consider events where anticipated attendees will exceed a trigger figure. Whilst this has some merit, the levels of risk associated with an event may be greater with events that may not reach this 'trigger' (e.g. the profile of the audience is as important).

25.19 It is important to develop a protocol which will assist in this process and safeguard those making these decisions in term of their liabilities. Of course, referring an event to a SAG does not necessarily imply lengthy discussions at meetings, as there are 'smarter' ways of discharging the responsibilities. It is also, however, important to ensure that relatively small events involving low levels of risk are not subjected to unnecessary bureaucracy.

25.20 Determining whether or not to refer an event to a SAG does require a consistent approach. This should be based on a risk-based approach, and be determined by considering a combination of:

- Numbers attending (at any one time);
- Levels of risk with the event: and
- Events of an unusual nature
- Other events at the same time that may increase the impact and risk

The level of SAG input will appropriately be proportionate to the size, scale and risk of the event and/or activity involved. It may also be relevant to consider the cumulative consequences of multiple events within a local area.

Note: Many SAGs have developed protocols to assist in this process with some identified in the EPC guidance (Appendix 'C' - Examples of Good Practice).

25.21 Many events will fall outside of the regulatory arrangements, such as licensing, and consequently will not automatically come to the attention of a SAG. Members of a SAG should, however, ensure that there is a focal point at which details of events they become aware of can be collated.

25.22 It should then be possible for an event organiser to be contacted in order to obtain further detail on which to base the decision regarding referral to the SAG. This is relatively easily achieved and managed via local authority websites and on-line eForm facilities. Whilst in the first place this may only require basic event and organiser details it should be sufficient to inform SAG members whether more detailed information is required.

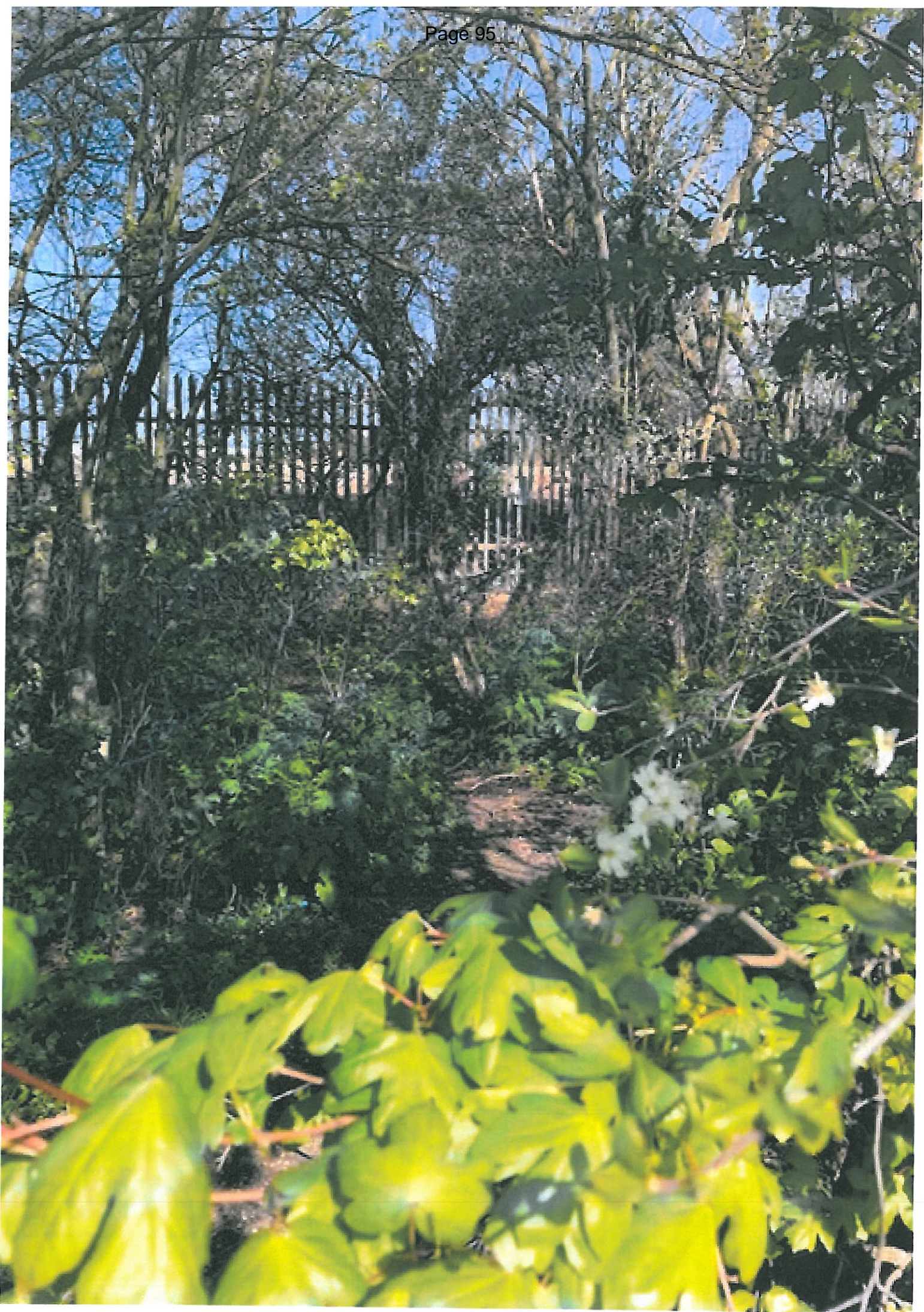
25.23 It will be important to encourage co-operation from event organisers to ensure timely notifications and availability of relevant documentation. It is important to seek to establish a culture whereby it is recognised that working with a SAG is a positive and beneficial experience. It should also be considered that some event organisers may also be working with tight timescales.

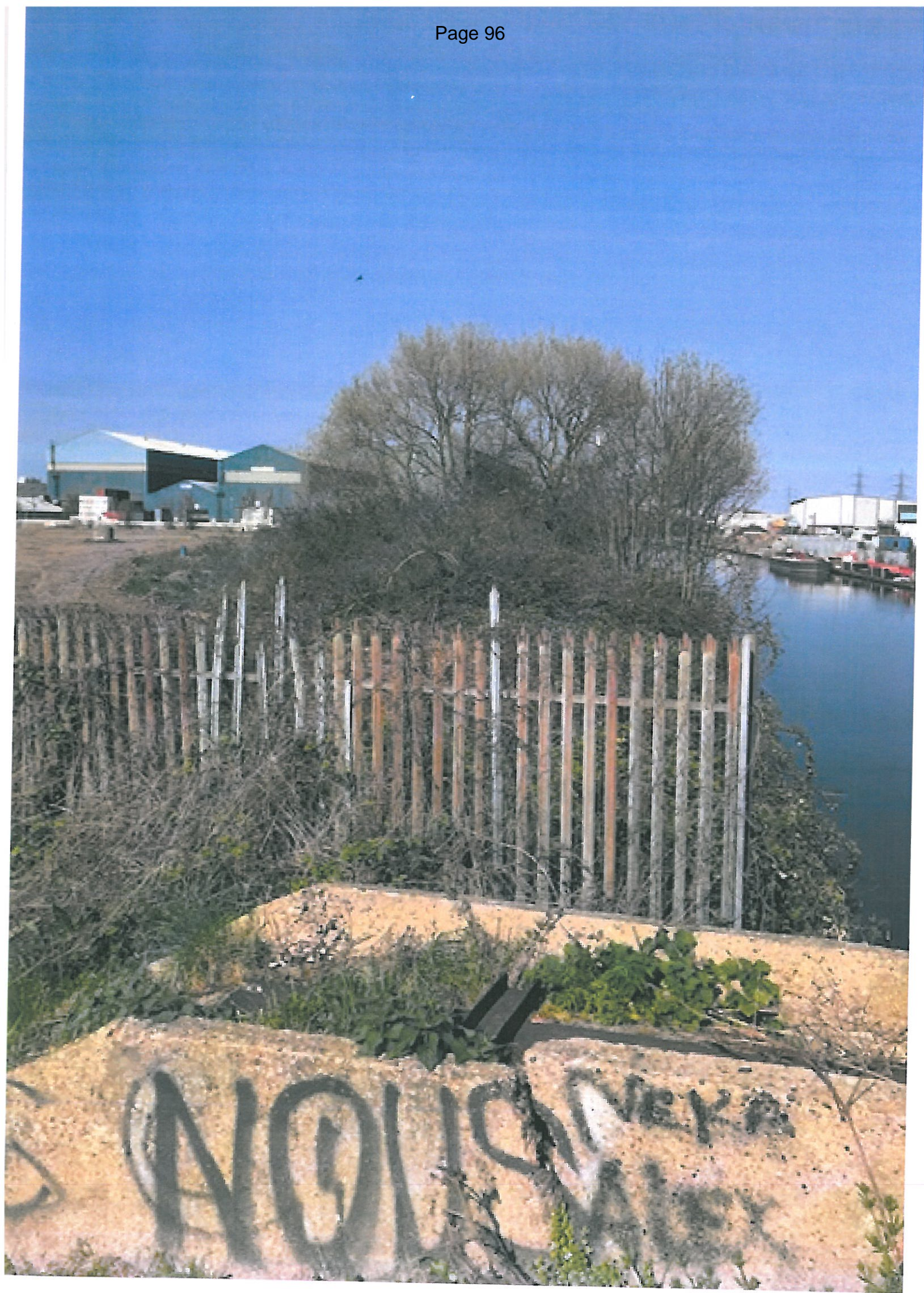
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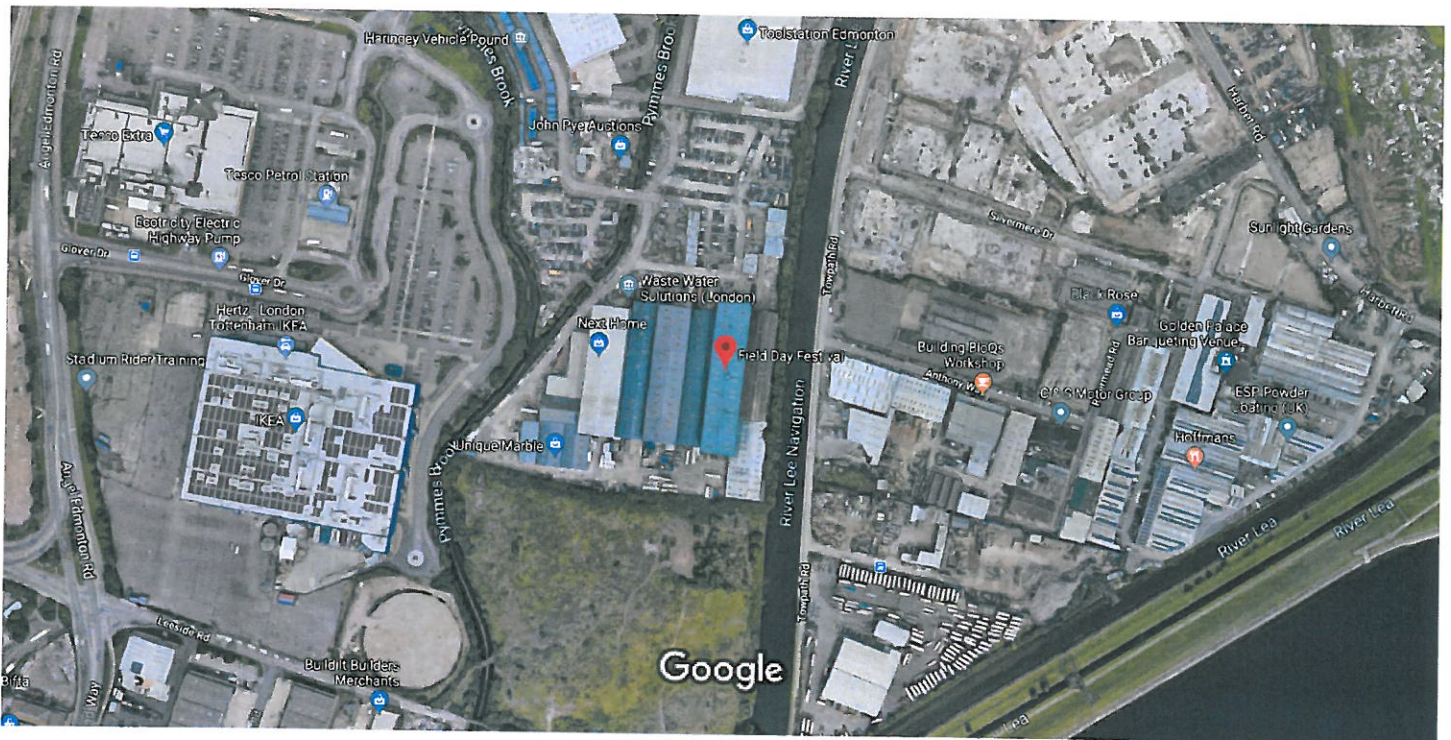
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Our Ref: SED/TOT9/10
Your Ref:
Date: 23 January 2019

Dear Sirs

Relevant Representation against the issue of a new Premises Licence relating to Gas Works/Meridian Water Site and Warehouse, Enfield N18 3BW ("Gas Works Site"), and/or Unit 4, 5, 6 and Land to the South, Orbital Business Park, 5 Argon Road, Enfield N18 3BW ("Orbital Site").

Our Client/Objector: Tottenham Hotspur Limited and Tottenham Hotspur Football & Athletic Co Ltd, both of Lilywhite House, 782 High Road, London N17 0BX

We have been instructed by the above-named clients to lodge representations against two recent applications made by the Applicant (Broadwick Venues Limited) seeking Premises Licence(s) in relation to proposed licensed "Premises" as identified in the above heading.

Background

Our understanding is that in December 2018, an application was issued by the Applicant relating to the Gas Works Site, seeking, amongst other matters:

1. An **indefinite** Premises Licence allowing for licensable activities of all categories of Regulated Entertainment (including Boxing and Wrestling); the Sale of Alcohol by Retail and Late Night Refreshment, from 08:00 to 06:00 so for **22 hours** daily;
2. The proposed "Premises" involves a number of **warehouses/sheds** and a large expanse of **open land** bordered by waterways;
3. The authorisation sought would enable an **audience of up to 49,999** people at events;
4. Draft conditions have been proposed in section M of the LIC 2 Application Form to support the application – but see our later comments regarding these.

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5. A Site Plan – with no address or postcode and not to scale, and not compliant with Regulation 23 of the 2005 Licensing Regulations – was provided by the Applicant

The above application was advertised in the local paper with a “Last Date for Representations” (LDR) of 18 January 2019.

Whilst considering a response to the above Application, we then discovered a second application on page 75 of your Authority’s “License Register” webpage relating to the “Orbital Site” (as defined in the heading to this letter). This application appears:

1. To be in the **same terms** as the Gas Works Site application save that the “Premises” are given a different name and address (although the postcode remains the same);
2. To have been issued **without a plan** (or at least one could not be located on the register of applications).
3. To suggest that the LDR is **6 February 2019**, the application having been issued on 9TH January 2019.

Information provided by Licensing Authority on 17 January:

We have since spoken to one of your Licensing Officers who has kindly confirmed that:

1. The Gas Works Site application is no longer effective – it being rejected by the Licensing Authority due to the proposed “Premises” being inadequately described;
2. The effective application is that relating to the “Orbital Site” with a LDR of 6 February 2019;
3. Whilst the Licensing Officer could not open the plan on the system she believes that the plan is substantially the same as lodged previously;
4. The Orbital Site application seems to be in the same terms as the Gas Works Site application;
5. A provisional Committee Hearing date has been listed for 10am on **6 March 2019**.

In the event of any of the above information being inaccurate, kindly email the writer at Sue.dowling@blandy.co.uk as a matter of urgency.

Representation against the above application(s)

In any event, our clients hereby make Representations against the issue of a new Premises Licence (for the Gas Works or for the Orbital Site) on the basis of all four Licensing Objectives under the Licensing Act 2003. Our client is firmly of the view that if the proposed Premises Licence is granted allowing for events to take place with audiences of almost 50,000 people,



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this is likely to have very significant, and serious, negative consequences for crime and disorder; public nuisance and public safety, and further could act contrary to the licensing objective that children be protected from harm.

Our client's Representation comprises three fundamental parts:

1. **General Principles** namely that the application is inappropriate (as being contrary to the four licensing objectives) when viewed in the context of existing licensed Premises in the vicinity;
2. **Procedural irregularities:** The Application is defective procedurally. Without limiting the aforesaid, the plan submitted fails to show any of the information required under Regulation 23(3)(a) to (j); and/or
3. **Inadequacy of information in the draft Operating Schedule and/or inappropriate conditions:** The information included in the LIC 2 Application (and in particular the Operating Schedule and draft conditions) is inadequate to ensure the promotion of the Licensing Objectives.

General Principles:

As Enfield Council is aware, our clients are supportive, in principle, of regeneration efforts in the vicinity of its new stadium (including the Meridian Water scheme specifically). They fully appreciate that the development of disused sites (such as the suggested "Orbital Site") for useful purposes to add value to the community (through the generation of jobs; development of culture etc.) will often be valuable and also that temporary 'meanwhile uses' can also contribute to place-making, pending the implementation of longer term redevelopment.

However, when a proposed Premises Licence is sought for what appears to be largely an open-air site for multi-use, large-capacity; late-night events (in a heavily populated city), it is, in our view, clearly insufficient for an Applicant to only consult with the Responsible Authorities for that Licensing Authority. Instead, it is reasonable to expect, the Applicant to conduct wider consultation with others who will obviously be affected by the application such as the operators of nearby substantial venues falling within nearby boroughs, and the Responsible Authorities for those venues. This principle is clear from the Revised Guidance to the Licensing Act (paragraph 8.13) and makes obvious sense to ensure a joined-up approach to the co-ordination of large scale events, and their impact on public resources. Our clients, as operators of the new Tottenham Hotspur Stadium, and other local (and city-wide) Authorities and organisations have an obvious (and crucial) role to play in any consultation relating to the Orbital Site application. To issue a formal application seeking a new Licence in such wide-reaching terms without first completing comprehensive consultation (beyond the statutory minimum) is arguably irresponsible.



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Our understanding from our clients is that **no such meaningful consultation has taken place** prior to, or following, the lodging of the licence application. Indeed, the current application was brought to our client's attention by a third party. The submission of the first licence on 24 December 2018 immediately ahead of the Christmas and New Year holiday period, without any notification suggests little appetite for engagement with our client. If they had been invited to participate in any consultation, it would have been apparent that the current application, for the Orbital Site, is not viable as it takes no account of the fact that:

1. The new Tottenham Hotspur Stadium (situated less than a mile from the Orbital Site and sharing many public transport facilities) will be operating (and has a Premises Licence, and appropriate planning consents to do so) "Bowl" Events on at least 46 occasions per annum. These large scale events will include unlimited football matches; other sporting Events (e.g. NFL) and up to 6 music concerts.

The capacity of the new Stadium is over 62,000, and with such large numbers of spectators/audiences coming to and from the Stadium on an almost weekly basis, considerable planning and consultation has already taken place between our clients and numerous agencies to ensure that the Stadium (including the licensed operation therein) can be operated safely. These multiple agencies include (but are not limited to) The Metropolitan Police (various levels from local Police to HQ/Gold Command); Transport for London; Network Rail; Emergency Services providers; The Fire Authority and the Responsible Authorities for Haringey Council – with input taken from those agencies to ensure that the Stadium can operate effectively and safely for all those visiting and working there. In addition, considerable planning work has been undertaken by a number of experts in the field of operating large scale events (for example crowd-modelling experts; acoustic consultants; transport planners), and their expert opinions have been fed into transport; noise management and other operational plans – again with a view to ensuring that the Stadium events are enjoyable for those attending and working at them but minimising the risk of local residents and businesses being negatively impacted as they go about their business in the locality (including using public transport).

One of the more significant challenges faced by our clients has been the delay to the completion of both the Network Rail and London Underground Limited works at Tottenham Hale station, meaning a limited station capacity. Whilst Tottenham Hale is one of four stations serving our client's new Stadium (in addition to the enhanced transport services it is laying on separately), any events at the Orbital Site would be almost wholly depending upon that station, particularly in advance of the completion and commissioning of Meridian Water station and Enfield Council's access works around it.



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As well as the Stadium having the benefit of a Premises Licence, it will also have a General Safety Certificate as required for an open-air sports ground, and again that Certificate has been developed after months of consultation and discussion with the various Authorities mentioned above. Access to and egress from the Stadium is a fundamental aspect of the GSC and of course, in practice this means the availability of a reliable (and available) public transport system.

The Premises Licence for the Stadium was granted in June 2018, after considerable work was undertaken by numerous individuals and organisations – with bespoke licence conditions to ensure that the licensing objectives are promoted.

2. If a large-scale event (i.e. involving c 3,000 or more spectators) was held at the Orbital Site on the same day/evening as a Stadium Bowl Event – this would not only (in all likelihood) bring the public transport system to a standstill, but would also result in the Authorities being over-stretched in the community – putting at risk not only those attending events at the Stadium and/or the Orbital Site event but also those living in the community. It would in all likelihood subject the Police; Transport Authorities and Fire Authorities to an unacceptable level of operation and risk.

Defective Procedural Requirements

At the time of writing, we have not been able to obtain a copy of the plan which supports the Orbital Site application but the plan supporting the original Gas Works Site application is clearly not compliant with Regulation 23 – as explained above. In particular, the plan does not explain which licensable activities are likely to be conducted where in the proposed Premises.

Inadequate Operating Schedule and Draft Conditions

We have not as yet had sight of the LIC 2 form relating specifically to the Orbital Site application, so this aspect of the Representation may be amended in due course.

We have assumed for now that the LIC 2 Application form is in similar terms to the form which related to the Gas Works Site application. Our observations in relation to the latter are as follows:

1. We note that the Applicant seeks an indefinite Premises Licence for licensable activities for 22 hours a day for up to 49,999 people – indoors and outdoors. Without any history of successful trading at the proposed Premises and in view of the scant information in the LIC2 Application and the lack of comprehensive consultation, the Licensing Authority may be of the view that an indefinite licence is wholly inappropriate as such could seriously jeopardise the safety of those visiting



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the proposed "Premises"; visiting other places (including, but not limited to, the Stadium) close-by and indeed even the safety of local residents and businesses in the locality who/which may need public facilities, whilst going about their daily business.

2. The information on page 4 regarding the size of planned events falling under three categories (a, b and c) and repeated on page 17 in section M(a)(1) to (4) differs from the capacity bands in proposed condition (2) also page 17 causing confusion; ambiguity and rendering the conditions ineffective and unenforceable.
3. Sections A to I (pages 5 to 12) – The Applicant has failed to provide any information relating to the planned licensable activities save for stating that they would take place indoors and outdoors for a maximum of 22 hours daily. Consequently if granted, the Licence would authorise extreme activities which clearly would not be acceptable to those in the community. For example, the Applicant is seeking permission to have Boxing entertainment outdoors for up to 49,999 people starting at 8 am and finishing at 6 am the following morning, on a daily basis without providing any further information regarding the proposed activity. The same applies in relation to the "sale of alcohol by retail" (see section J on page 14) – with the Applicant again providing no supplementary information (either in its plans or in the LIC 2 Form).
4. Section M – Page 17 – Our observations are that these measures/draft conditions are insufficient and/or inappropriate and/or ineffectual as unenforceable, due to the "general principles" set out above and the following specific points:

Section M:

(a)(1): The capacity bands are *not consistent* with those specified at (b)(2);

(b):

(4) This condition is vague and is dependent on a third party (the "Group") making a request, which is inappropriate (it being the Applicant's responsibility to run any licensable activities in a manner promoting the Licensing Objectives). The condition is unenforceable in its current draft;

(5) The process referred to therein is not defined and consequently ambiguous and probably unenforceable;

(6) This condition is not sufficiently precise. Further "submission" of plans etc.. is insufficient and again relies on third party actions;

(7) One assumes that this is supposed to refer to the documentation set out in condition (6) rather than condition (5) but in our view, the condition is still meaningless and unenforceable. At the very least one would expect more precision about the approval process of the various operation plans; by whom and what process has to be followed (including full information regarding risk assessment



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procedures). This condition also takes no account of the lack of resources from which many Licensing Authorities/Responsible Authorities and SAG Groups suffer. What protection is there if inadequate plans are submitted but the Authorities do not have the manpower or opportunity to revert to the Applicant?

(8) This draft condition is unenforceable and effectively meaningless. The obvious difficulty is what transpires if our clients do not support any event at the Orbital Site due (perhaps) to an Event taking place at the Stadium (or at one of its other licensed venues including the Southern Plaza near to the Stadium)? Phrases such as “having regards to” and “consulting with” are too vague.

(9) This draft condition means very little without sight of the “bespoke” plans – are a copy available?

(15) This condition is meaningless and unenforceable without the different areas of the Premises being clearly defined.

(16) It is unclear whether this condition is supposed to relate to SIA licensed door supervisors.

(19) No minimum staffing levels are provided; also there are no conditions relating to the use of appropriately trained stewards for the size of audience.

(29) First aid condition – this is insufficient in view of the fact that an event may hold 49,999 people.

At the very minimum for a proposed venue with a maximum capacity of over 50,000 with staff and performers and in close proximity to a Stadium (with a capacity of over 62,000) one would expect that any Premises Licence would not be issued or certainly would not be effective until such time as:

1. All of the plans listed in draft condition 6 have been provided in writing in draft form to (as a minimum) the Responsible Authorities for Enfield and for Haringey; to the MET (HQ/Gold Command as well as local licensing Police for both boroughs; Emergency Services; TfL and to our clients;
2. A comprehensive consultation process has taken place (in a sensible time-scale to allow for the existing commitments of all those involved) regarding those draft plans to ascertain whether the provisions contained therein are feasible and are consistent with the Licensing Objectives;



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3. The Responsible Authorities for Enfield (having taken input from Haringey Responsible Authorities and other interested persons) have approved the plans listed in condition 6 for all Categories of events.

In view of the detailed Representation above and the very serious concerns that this premature Premises Licence application has raised, the Applicant may consider it best to withdraw its application, at least until such time as comprehensive consultation has taken place.

Kindly confirm safe receipt of this letter of Representation on behalf of Tottenham Hotspur Limited (of Lilywhite House, 782 High Road, London N17 0BX) and on behalf of Tottenham Hotspur Football & Athletic Co Ltd (of the same address). Please note that any correspondence or information relating to this matter should be sent to the writer or emailed to her at Sue.dowling@blandy.co.uk

Yours faithfully

A handwritten signature in black ink that reads "Blandy & Blandy LLP." The signature is written in a cursive, flowing style.

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Annex 10

IP5 - Resident B Representation

I am grateful that as a result of my objections that the 192 will continue to run.

I maintain that there is still a very real prospect that the rail station is not ready. In that instance, I do believe that a contingency should be made for a shuttle bus to Tottenham Hale. Ashley Rd can be used for pickup, drop off and turn back.

I object to this being a 24hr event with trains stopping around 1pm with no night shuttle bus service to Tottenham Hale.

I object to TfL not boosting nearby 24hr buses above 2bph after 1pm when the proposed train service is not operating. I propose that the 341, 34 and W3 be maintained at 4bph all night during the event and that the W3 be extended to Glover Drive for the event to avoid overcrowding.

341 can be boosted to Manor House or Tottenham High Rd only, 34 can be boosted from Arnos Grove to Walthamstow only and W9 can be boosted to Wood Green only.

I am concerned about how local residents will reach the site from Upper and Lower Edmonton by foot. Locals should not be routed via Tottenham Hale and there needs to be a special taxi rank for those who do not want to head to Tottenham Hale.

Additional Information received 30/4/2019

The venue website is advertising the 192 as a route to it. This is inappropriate because the 192 is presently beyond capacity at most times of the day in peak direction.

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Annex 11

Representation from Esther Hughes, Enfield Safety Advisory Group Chair (SAG)

Drum Sheds Only

Ref: WK218074640

From: Esther Hughes

Sent: 10th April 2019

Re: SAG Representation and Proposed Conditions for Premises Licence by Broadwick Venues Limited

Premises: Meridian Water, Units 4, 5, 6, 6a&b, Orbital Business Park, 5 Argon Road, Edmonton, London, N18 3BW












Dear Ellie,

Please consider this representation on behalf of the Safety Advisory Group (SAG) in respect of the above application under the licensing objectives Public Safety and Public Nuisance.

On the 1st April 2019, Broadwick Venues Limited provided documentation in support of the licence application for regular use of the Drum Sheds at a capacity of 9,999. These documents were circulated to the SAG for comments. The Chair of the SAG acknowledges that some of the Responsible Authorities, who are stakeholders of the SAG will also submit their own representations.

The SAG representation will not contradict any of the representations made by the Responsible Authorities but seeks to ensure that the concerns of all SAG stakeholders are addressed. Furthermore, following legal advice to the SAG, the group have proposed some amendments to the wording of conditions. Again, these should not be at the detriment/contradict any proposed conditions by the Responsible Authorities, the intention is to strengthen and promote the licensing objectives. The SAG welcome further discussions with Broadwick Venues Limited regarding the proposed conditions.

Documentation provided to the SAG for the Drumsheds

-  Appendix A - Contacts and Organisational Structure
-  Appendix B - Noise Management]
-  Appendix C - Crowd Management (DRAFT)
-  Appendix D - Drugs Policy
-  Appendix E - Venue Capacity Assessment
-  Appendix F - Medical Plan
-  Appendix G - TMP
-  Appendix G - TMP .pdf.aeatxof
-  Appendix H - Youth and Vulnerable Persons Policy
-  Drumshed Site Plan
-  Meridian Water - Venue Management Plan 29.03

However, at the time of writing the following remain outstanding and therefore contribute to this representation.

i) Emergency Evacuation Plan

- Absence of detailed egress plans for planned and emergency evacuation of the site. (Public Safety Objective)

i) Risk Assessments

- Details of risk assessments (Public Safety Objective)

ii) Venue Capacity Assessment for the warehouses (*this document is not to the satisfaction of the London Fire Brigade; and will be dealt with by the Fire Brigade and Broadwick Venues Limited outside the comments of this representation*)

iii) Noise Level

- Whilst the noise management plan refers to a noise level, the SAG recommend that this is made an explicit licence condition. (Public Nuisance Objective)

Broadwick Venues Limited have advised the SAG that the emergency evacuation plan and risk assessments will be circulated week commencing 8th April 2019. However, this will leave insufficient time for the SAG to consider these in advance of the last date for representations being Saturday 13th April 2019. (*Effectively the last working day would be the 12th April*)

Therefore, the SAG would not wish to be prematurely “agreeing” to a licence without consultation on all the event management documents. Should these documents be circulated and agreed in advance of the licencing committee hearing then the SAG would seek to withdraw this representation.

Having reviewed all of the event documentation there are some matters which require further clarification. Whilst these would not amount to a representation against the licence, the SAG would recommend that these are resolved in advance of the use of the licence should it be granted. More information is detailed in the SAG Licensing Committee Report which is not a representation but an informative for the Licensing Committee.

In order to ensure that the conditions of the licence are enforceable and support the licensing objectives, the SAG make the following recommendations at section 3 below, regarding amendments to the proposed licence conditions.

The SAG will continue to work with Broadwick Venues Limited who have been very accommodating to suggestions and proposals to date. We wish to continue this good working relationship.

The black text has been taken from the licence application; [the blue text is the proposed amendments and/or comments from the SAG.](#)

1. Licence Application Overall

1.1 All proposed licence conditions have the prefixed word “that” removed.

2. Part 3 Operating Schedule

Existing Wording and condition number on Application	Proposed wording
M a) General – all four licensing objectives (b, c, d and e)	
<p>1. For all events, the premise licence holder shall have in place documentation for the venue that will be reviewed prior to each event and updated and amended if required. These documents will detail action to be taken by staff, will be available for inspection by the licensing authority and will include:</p> <ul style="list-style-type: none"> - Venue Operational Plan; - Traffic Management Plan; - Security/Crowd Management Plan; 	<p>Reword to</p> <p>1 For all events, the premise licence holder shall have in place documentation for the venue; this will be reviewed prior to each event; updated and amended if required</p> <p>The documentation must include but is not limited to the following;</p> <ul style="list-style-type: none"> (a) Venue Operational Plan; (b) Traffic Management Plan; (c) Security/Crowd Management Plan; (d) Noise Management Plan; (e) Risk Assessment(s); (f) Drugs Policy;

<ul style="list-style-type: none"> - Noise Management Plan; - Risk Assessment(s); - Drugs Policy; - Medical Management Plan; - Youth and Vulnerable Persons Policy - Any other associated documentation. - A plan showing these temporary non-fixed structures will be created and circulated as part of the operational plan for each event. 	<ul style="list-style-type: none"> (g) Medical Management Plan; (h) Youth and Vulnerable Persons Policy (i) Any other associated documentation. (j) A plan showing these temporary non-fixed structures will be created and circulated as part of the operational plan for each event.
	<p>Proposed new condition Requirements within all the documentation set out in Condition 1 will form additional conditions on this premises licence which will be observed and complied with.</p>
	<p>Proposed new condition All documentation, monitoring procedures, registers and records required by the conditions of this licence must be kept for one year and made available at the premises upon request by any of the Responsible Authorities.</p>
<p>Part M a)The prevention of crime and disorder</p>	
<p>2. That all staff will be given training in</p>	<p>Retain Condition</p>

<p>relation to the Licensing Act 2003 and the following specific areas; Licensing Act 2003 objectives and awareness, management systems and processes to enforce the premises licence conditions, Challenge 25 and the responsible retail of alcohol, warning and eviction (guidelines and procedures), conflict management and maintaining all required records and registers.</p>	
<p>3. That the maximum capacity of the premises is 9,999 persons for all DJ / music led nights and 9,999 patrons for all day time events and exhibitions.</p>	<p>Retain Condition</p>
<p>4. That clearly legible signage shall be prominently displayed where it can easily be seen and read by customers at all exits / entrances at the premises and in all external areas of the premises requesting to the effect that customers leave the premises in a quiet and orderly</p>	<p>Reword to</p> <p>That clearly legible signage shall be prominently displayed where it can easily be seen and read by customers at all exits / entrances at the premises requesting that customers leave the premises in a quiet and orderly manner with respect for local residents.</p>

<p>manner with respect for local residents.</p>	
<p>5. That a register will be maintained at the main entrance to the premises showing the names, addresses and up to date contact details including mobile phone contact numbers for the Licensee and other members of the management team who are on duty.</p>	<p>Retain this condition</p>
<p>6. That no alcohol will be brought in to the premises by any customers at any time.</p>	<p>Retain this condition</p>
<p>7. That any event held at the premises will be risk assessed and a suitable and sufficient number of male and female door supervisors will be employed at the premises in accordance with the risk assessment. A search policy will be implemented in line with the risk assessment.</p>	<p>Amend condition</p> <p>There must be a minimum number of SIA door supervisors to the ratio of xx ration to be provided in agreement with the Police.</p>
<p>8. The Venue Manager will only permit</p>	<p>Retain this condition</p>

<p>the sale of alcohol for consumption off the premises where the alcohol is a specialist product, e.g. wine sold as part of a food and drink festival or a gift in part of a corporate event. For events which are promotional events, sealed bottles of alcohol may be part of a gift for people attending the event and customers will be allowed to leave with those sealed containers. This will be enforced by security confiscating open vessels on exit points.</p>	
<p>9.The crowd management plan dealing with the dispersal and egress of guests will be in operation for every event held at the premise, details of this can be found in the operational plan.</p>	<p>Remove as contained in condition 1</p>
<p>10.That promotional literature and tickets will contain information regarding transport options and shall request that persons leave the area quietly.</p>	<p>Remove – this takes place when non licensable activities are taking place; this is a good idea but should be in EMP as unenforceable.</p>
<p>11.That SIA security staff and/or stewards to be briefed to monitor and remind patrons</p>	<p>Retain this condition</p>

<p>where necessary to leave the site quietly</p>	
<p>12. That any substantial queues formed within and outside the premises shall be supervised by event staff where appropriate. Such supervision shall be aimed at preventing disorder and discouraging anti-social behaviour.</p>	<p>Remove as contained in condition 1</p>
<p>13. All staff will receive licensing training in relation to the sale of alcohol, times and conditions of the premise prior to the premises opening. Training records will be kept on the premises.</p>	<p>Reword to</p> <p>All relevant staff shall receive training relating to the sale of alcohol and the times and conditions of the premises licence.</p>
<p>14. That a comprehensive incident book / incident recording system shall be kept at the premises to record details of any of the following occurrences at the premises:</p> <ul style="list-style-type: none"> - Instances of anti-social or disorderly behaviour - Violence - Calls to the police or fire brigade - Abuse of staff and / or customers 	<p>Reword to:</p> <p>The incident and event log shall be kept on the premises and completed on each occasion an incident or event as listed in a-g below occurs:</p> <ul style="list-style-type: none"> (a) All crimes reported to the site; (b) All ejections of patrons; (c) Any complaints received; (d) Any incidents of disorder; (e) Any faults in the CCTV system; (f) Any visit by a relevant authority or emergency service. (g) Any other incident or event that impacts upon the promotion of the Licensing Objectives within the Licensing Act 2003

<ul style="list-style-type: none"> - Ejections of people from the premises - Visits to the premises by the local authority, police or fire brigade - Refused sales of alcohol - Any malfunction in respect of the CCTV system - Any other relevant incidents 	
<p>15. The incident book / incident recording system shall record the time, date, location and description of each incident, the printed and signed name of the person reporting the incident and any action taken in respect of the incident. The incident book / incident recording system shall be available / be accessible at the premises at all times that the premises are in use in accordance with this licence and shall be made available to officers of the council, police or fire brigade on request.</p>	<p>Reword to:</p> <p>The incident book / incident recording system shall record the time, date, location and description of each incident, the printed and signed name of the person reporting the incident and any action taken in respect of the incident.</p>
<p>16. That a written record is kept of all staff authorised to sell alcohol; this staff record</p>	<p>Reword to;</p>

<p>is to contain the full name, home address, date of birth and national insurance number of each person so authorised. The staff record is to be kept on the licensed premises and made available for inspection by the Licensing Authority, Trading Standards or the Police as soon as reasonably practicable.</p>	<p>A written record shall be kept of all staff authorised to sell alcohol; this staff record is to contain their full name</p>
<p>17. That SIA security staff and/or stewards to be briefed to monitor and remind patrons where necessary to leave the site quietly.</p>	<p>Remove as contained in condition 1</p>
<p>18. A digital CCTV system must be installed in the premises complying with the following criteria:</p> <ul style="list-style-type: none"> - Cameras must be sited to observe customer entrance and exit doors both inside and outside, the bars and floor areas. - Where practical be capable of visually confirming the nature of the crime committed. - Provide a linked record of the date, time and place of any image. - Provide good quality images during opening times. - Have the recording device located in 	<p>Reword to:</p> <p>A digital CCTV system must be installed in the premises complying with the following criteria:</p> <ul style="list-style-type: none"> (a) Cameras must be sited to observe the entrance and exit doors both inside and outside, the alcohol displays and floor areas. (b) Cameras on the entrances must capture full frame shots of the heads and shoulders of all people entering the premises i.e. capable of identification. (c) Cameras viewing till areas must capture frames not less than 50% of screen. (d) Cameras overlooking floor areas should be wide angled to give an overview of the premises. (e) Cameras must capture a minimum of 16 frames per second. (f) Be capable of visually confirming the nature of the crime committed. (g) Provide a linked record of the date, time and place of any image. (h) Provide good quality images – colour during opening times.

<p>a secure area or locked cabinet.</p> <ul style="list-style-type: none"> - Have a monitor to review images and recorded picture quality. - Be regularly maintained to ensure continuous quality of image capture and retention. - Have signage displayed in the customer area to advise that CCTV is in operation. - Digital images must be kept for 31 days. - The police and authorised officers of the council will have access to images upon request - The equipment must have a suitable export method, e.g. CD/DVD writer so that the police or authorised officers of the council can make an evidential copy of the data when they require. - All cameras shall record constantly during all hours the premises are open to the public or to a section of the public permitted access for corporate or private events. - There must be a member of staff on site who can operate the CCTV when requested 	<ul style="list-style-type: none"> (i) Operate under existing light levels within and outside the premises. (j) Have the recording device located in a secure area or locked cabinet. (k) Have a monitor to review images and recorded picture quality. (l) Be regularly maintained to ensure continuous quality of image capture and retention. (m) Have signage displayed in the customer area to advise that CCTV is in operation. (n) Digital images must be kept for 31 days. (o) Police will have access to images at any reasonable time. (p) The equipment must have a suitable export method, e.g. CD/DVD writer so that the police can make an evidential copy of the data they require. This data should be in the native file format, to ensure that no image quality is lost when making the copy. If this format is non-standard (i.e. manufacturer proprietary) then the manufacturer should supply the replay software to ensure that the video on the CD can be replayed by the police or authorised officer of the Council on a standard computer. Copies must be made available to the Police or an authorised officer of the Council on request.
<p>19. That all information contained in the transport statement submitted to Enfield Council on application for this licence will be implemented by the premises licence</p>	<p>Remove as contained in condition 1 & the TTO is a public document anyway</p>

holder. A copy of the transport statement shall be kept at the premises and be made available to council or police officers on request.	
20.For any event that runs past an operational time of 4:00am a last entry policy will be in place stopping guests from entering the venue past 1:00am.	Retain this condition
21.Licensable activities such as the sale of alcohol will cease one hour prior to the venue closing for events with a run-time to 6:00am, allowing a one-hour wind down unless agreed in advance with the responsible authorities.	Do the police make any amendment to this ?
	<p>Add new condition:</p> <p>For non corporate music led events photo identification of all persons, including staff are passed through the system prior to being permitted entry to the premises. The details recorded on the system should be retained for at least 31 days and made available to police upon reasonable request for the provision of preventing and detecting crime and identifying suspects and witnesses.</p> <p>Or similar as per any request from the Police</p>
Part M c) Public safety	

22. That for each event an event overview shall be prepared and be made available for inspection by the responsible authorities.	Remove as detailed in Condition 1
23. That unless otherwise agreed in writing with the Licensing Authority, details of any proposed use and storage of lasers, special effects, fireworks or pyrotechnics shall be reflected in the Venue Operational Plan	Remove as not licensable activity; dealt with by other H & S legislation.
24. That a medical plan shall be devised in respect of the premises and a copy of the medical plan shall be available / be accessible at the premises at all times that the premises are in operation. The medical plan shall be made immediately available to council or police officers on request. First aid cover and facilities appropriate to any event must be provided in accordance with the medical plan.	Remove as detailed in Condition 1
25. That toilet facilities will be appropriately provided in accordance with each Venue Operational Plan, including the provision of external toilets if and when required.	Remove as detailed in Condition 1
	Add New Condition

	Defer to the Police for any additional condition regarding provision of Shuttle buses .
Part M d) The prevention of public nuisance	
26.That a comprehensive Noise Management Plan shall be devised and reflected in the Venue Operation Plan in respect of the premises and a copy of the Noise Management Plan shall be accessible at the premises at all times that the premises are in operation. The Noise Management Plan shall be made immediately available to council or police officers on request. That the licensee will ensure that the premises Noise Management Plan is adhered to at all times.	Remove as detailed in Condition 1
27.That all relevant staff working at the premises shall be trained in the content of the Noise Management Plan and be aware of their responsibilities and duties under it. Records of relevant training shall be kept with the Noise Management Plan.	Remove as detailed in Condition 1
28.That the Noise Management Plan shall be reviewed whenever there is a significant change at the premises. For example, a significant change could include a new licensee, change to premises layout, a refit, a change to the type or style of licensed	Remove as detailed in Condition 1

entertainment etc.	
29.That a telephone number and/or email address should be made available on relevant websites for any noise complaints. Any noise complaints should be logged and investigated with written records of the details available to view by the Local Authority. Should any noise complaints be received, and if noise levels are above those specified in the licence conditions, action should be taken to reduce the levels at the noise source.	Retain this condition
30.That in the event of an emergency, music will cease and safety announcements will be relayed to attendees to a suitable non-powered back-up system will be in place.	Remove – its unenforceable & would be detailed in the EMP
31.That patrons of the premises shall be provided with the details of preferred mini cab companies.	Remove; its subjective & sits outside of licencing as would be part of marketing.
32.That permitted sound levels shall be specified in the contract conditions with hirers of the premises to ensure sound levels are maintained within the limits in order to reduce the risk of disturbance. Further, during a function in the premises, sample noise measurements shall be	Remove – Remove as would be contained in Condition 1.

<p>made by a designated person with an approved sound level meter to ensure that the levels are not being breached. Immediate action will be taken to reduce levels if this should arise.</p>	
	<p>Add new condition</p> <p>Any amplified sound arising from the Drumsheds shall not exceed 59dB $L_{Aeq\ 5\ min}$ and 68dB $L_{Ceq\ 5\ min}$ measured 1 metre from the boundary of any residential property between the hours of 09:00 – 23:00 and shall not exceed 52dB $L_{Aeq\ 5\ min}$ and 62dB $L_{Ceq\ 5\ min}$ measured 1 metre from the boundary of any residential property between the hours of 23:00 – 09:00.</p>
<p>Part M e) The protection of children from harm</p>	
<p>33. That a challenge 25 scheme shall be maintained at the premises requiring that staff selling alcohol request that any customer who looks under 25 years old, and who is attempting to purchase alcohol, provides valid photographic identification proving that the customer is at least 18 years old. Full details will be contained in the youth and vulnerable person policy.</p>	<p>Reword to be consisted with condition 39 on warehouse & Field licence</p> <p>That a challenge 25 scheme shall be maintained at the premises requiring that staff selling alcohol request that any customer who looks under 25 years old, and who is attempting to purchase alcohol, provides valid photographic identification proving that the customer is at least 18 years old.</p>
<p>34. Clearly legible signs shall be prominently displayed stating to the effect that a challenge 25 policy is in operation at the premises, that customers may be asked to provide proof of age and stating what the acceptable forms of proof of age are.</p>	<p>Retain condition</p>

35. That suitable records are kept of all refused sales of age restricted products.	<p>Reword to</p> <p>A record of refused sales shall be kept on the premises and completed when necessary.</p>
36. The operational procedure of all bars will adhere to the Venue Operational Plan.	<p>Remove as detailed in condition 1</p>
37. The Youth and Vulnerable persons policy agreed with the responsible authorities will be in operation at all events.	<p>Remove as detailed in condition 1</p>
	<p>Add New Condition</p> <p>All training relating to the sale of alcohol and the times and conditions of the premises licence shall be documented and records kept at the premises.</p>

Document ends

Esther Hughes
 Team Leader – Consumer Protection
 Chair- Enfield SAG

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Annex 12

IP8 – Resident C Representation

I wish register my objections on two counts.

Firstly the prevention of public nuisance due to the noise from the preposed venue being close to residential areas.

Secondly on the grounds of public safety due to the the large amount of people spilling out of the preposed venue adjacent to a busy main road with very few transport links in the area.

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