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11th April 2019

Meridian Water, Units 4, 5, 6, 6a and b and Land to the South
of the Orbital Business Park, 5 Argon Road, London N18
3BW

“Festival 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 have been submitted for this site and this "festival" application seeks a capacity of up to 40,000 persons permitting all licensable activities both inside and outside from 0800 hours – 0600 hours (with the exception of outside Live Music and Recorded Music where the application is for 0900 hours – 2230 hours 365 days a year). It would still permit music to be played and alcohol sold right through the night inside the large warehouses (without any capacity limit proposed as a licence condition).

In other words,– if not properly conditioned – this application would permit the venue to operate under this licence for 7 days per week for 22 hours a day throughout the year as a nightclub type premises hosting many thousands of

attendees each day/night.

Having met with the applicant Police believe the intention is to use this premises licence in order to authorise licensable activity for large external music events. The application seeks a capacity of up to 40,000 persons however this number is currently restricted to 25,000 persons due to the infrastructure of the site. There is no cap on the frequency of events.

Although the application is capped at 25,000 persons Police would have even more concerns should the premises licence capacity ever rise to 40,000 persons. During previous SAG meetings Transport for London have calculated that for 40,000 persons attending an event finishing at 22.30 the projected clearance times based on 60% (24,000 persons) would mean that the last persons being cleared from Tottenham Hale Station would be 0215 hours. It would be the view of the Police, that having a large number of persons who have been consuming alcohol waiting for long periods of time is likely to give rise to incidents of crime and disorder.

Application Form Box M(a) indicates that festivals and/or "large scale" events will be subject to SAG scrutiny. However it should be noted that the role of the SAG is that of an advisory group and the gathered members have ***no legal powers*** to prohibit events from taking place. Moreover, the licence does not define what a "large scale" event actually is. Do small scale events also have to pass SAG scrutiny too?

An event (the only event so far) that has been subject to the SAG process is Field Day on 7-8 June 2019 and event details can be found at the following link <https://fielddayfestivals.com/>.

There have been significant discussions and planning at SAG meetings with regards to this ticketed event which is due to take place at Meridian Water over

the weekend of 7-8 June 2019. The event occurs over 2 days and will incorporate a live music event for up to 25,000 persons concluding at 22:30 hours followed by an event for up to 7000 persons inside the warehouses finishing at 03:00 hours over both days. This is an untested event and this will be the first occasion that such a large event has been held at this location. It is surprising that tickets are already being sold for an event when no premises licence has yet been granted.

There is, as always, likely to be a commercial imperative for operators to use their licence 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 and that appears to be their intention. The applicant however has offered to provide Police with an event management plan.

This would mean that, should this application be granted as applied for, the warehouses could be used every weekend to accommodate thousands of people 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.

It is the view of the Police that incidents of crime and disorder would increase significantly if this application is granted in its present form.

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 in close proximity to two business premises and a large football stadium. One of the business premises is a 24 hour supermarket which currently benefits from a premises licence permitting the sale of alcohol 24 hours a day.

Although this premises is not located within an area covered by a special policy the most recent revised Secretary of State Section 182 Guidance at 14.42 states:

“The absence of a special policy does not prevent any responsible authority or other person making representations on an application for the grant or variation of a licence on the grounds that the premises will give rise to a negative cumulative impact on one or more of the licensing objectives. However on each occasion it would be incumbent on the person making the representation to provide relevant evidence of cumulative impact”.

It is the view of Police that if granted in the terms applied for this premises licence would also give rise to a negative cumulative impact with persons being drawn to the area for large events. Police experience suggests that persons would attend the nearby supermarket to purchase cheaper alcohol prior to attending the Meridian Water site (pre loading). Persons could also attend the supermarket at the conclusion of events to purchase further alcohol thus hindering the dispersal of persons from this area.

In addition if an event was to be held at the same time as other events within the local area this could potentially see up to 90,000 persons dispersing from this site placing significant strain on Transport For London (TFL) services.

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 significantly.

In light of the above and in order to promote the licensing objectives Police would ask that if the committee are minded to grant this application then they do so only to the extent that it permits Field Day event only to take place by granting a premises licence permitting the licensable activities applied for over the weekend of 7-8 June 2019 only.

This would be subject to all SAG members being satisfied that all recommendations have been addressed to their satisfaction in order for the event to take place.

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/Chief Inspector Jonathan Waterfield

Neighbourhood Policing – North Area (Enfield & Haringey)