Annex 12

IP6 Representation from Esther Hughes, Enfield Safety Advisory Group Chair (SAG)

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

And

Land to the south of 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.

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 listed below has been provided to the SAG for the Drum Sheds and the Field, essentially based around the use of the site for the 7th and 8th June 2019 for Field Day (capacity 25,000). It is important to note that document Appendix M – Transport and Pedestrian Management Plan V6.0 is based on the closure of Watermead Way from 20:00 to 05:00. This has been discussed

extensively at the SAG to ensure safety of persons egressing the site. Should this plan alter in a significant way then the SAG would need to be consulted which may make result in a different recommendation.

MALTIN

🏂 1 - Strategic Objectives V1.0 🏓 2 - Threat Risk Assessment V1.1 5 - ESMP V1.4 🟃 App A - Event Overview V1.4 🏃 App B - Site Plan V2.1 App C - Contacts V1.1 🗾 App H - Medical Plan V1.0 📌 App I - Crowd Management Plan V3.1 App J - Drugs Policy V1.0 App L - Adverse Weather V1.2 🗾 App M - Transport & Pedestrian Management Plan V6.0 🟃 App N - Noise Management Plan V1.1 App O - Ingress and Egress Plan V1.3 App S - Youth and Vulnerable Adult Policy V1.0 🟃 App T - Organisational Structure V1.1 App U - Communications V1.0

However, at the time of writing the following documents 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.

Notwithstanding the above, Part 3 Operating Schedule of this licence application refers to capping events at 25,000. Whist the SAG is supportive in principle of this, subject to the above documentation being agreed, they wish to draw to the Licensing Authorities attention, that the actual application is for 39,999.

The SAG is unable to comment on an event of this scale as there has been no supporting documentation to evidence the safe management of events at this capacity.

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

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

- 2.1 Application for 39,999
 - 2.1.1 There is currently no event management documentation that has been submitted to the SAG or as part of the licence application to demonstrate support of the licencing objectives for an attendee level of 39,999. The SAG are therefore unable to comment on this.

3. Part M

Existing Wording and condition number	Proposed wording and condition number
on Application	
Part M	The running of the festival and/or events over 25,000 will be subject to consultation
a) General – all four licensing	with the Licensing Authority; Planning Authority; Responsible Authorities and the Enfield Safety Advisory Group;

 objectives (b, c, d and e) The running of the festival and/or large-scale events and licensing requirements will be approved by a formal SAG process. This process will have an event management and safety plan (EMSP) which will be agreed through the SAG process. This will create additional operational conditions which will be attached to the premises licence as a result of the SAG process. A detailed layout plan showing positions of temporary structures such as stages, bars, food concessions, temporary toilet blocks and other infrastructure for the event will be provided and agreed through the SAG process. 	The documentation to support this will be as per condition 1 b below
 Part M b) The prevention of crime and disorder 1. For all events, the premises licence holder shall submit the following completed documentation bespoke to that event that meets the requirements of the Licensing Authority and the Enfield Safety Advisory Group: (a) Events Management and Safety Plan; (b) Traffic Management Plan; 	Reword to: Having regard to the current edition of the Purple Guide, to Health, Safety and Welfare at Music and Other Events, the premises licence holder shall submit a completed Event Management Plan, bespoke to the event, to the Licensing Authority and the Enfield Safety Advisory Group for consultation purposes. 1. The Event Management plan must include but is not limited to the following; 2.1Risk Assessment(s); 2.2Traffic Management Plan: 2.3Security/Crowd Management Plan; 2.4Noise Management Plan; 2.5Medical Plan

 (c) Security/Crowd Management Plan; (d) Noise Management Plan; (e) Risk Assessment(s); (f) Drugs Policy; (g) Youth and Vulnerable Persons Policy; (h) Medical Management Plan; (i) Any other associated documentation. 	 2.6 Alcohol and Drugs Policy 2.7 Youth and Vulnerable Persons Policy which will include; 2.7.1 Customer intoxication through drink and or drugs; 2.7.2 Ejection of vulnerable persons; 2.7.3 Refusal of entry to vulnerable persons; 2.7.4 The use of advertising materials directing customers who feel vulnerable to a member of staff. 2.8 Venue Capacity Assessment 2.9 Any other associated/relevant documentation.
	Add new condition Requirements within all the documentation set out in Condition 2 (<i>NB: this is the relevant condition number</i>) will form additional conditions on this premises licence which will be observed and complied with at all times the licence is in force.
	Add new condition
	All documentation, monitoring procedures, registers and records required by the conditions of this licence must be kept for one year and be made available at the premises upon request by any of the Responsible Authorities.
2 The event will be subject to the full Enfield	Remove as covered by Condition M a.
Safety Advisory Group process.3 Alldocumentation,monitoring	Remove as would be new condition above
procedures, registers and records required by the conditions of this	

	licence must be made available at the premises to the police and authorised officers of the council and should be kept for at least one year.	
4	Requirements to or affecting any of the Licensing Objectives set out in the Licensing Act 2003 contained within all the documentation set out in Conditions 1 and 2 creating the Event Management and Safety Plan will form additional conditions on the premises licence which will be observed and complied with.	Delete as detailed in condition above.
5	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.	Retain this condition
6	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	Reword to: 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

	requesting to the effect that customers leave the premises in a quiet and orderly manner with respect for local residents.	residents.
7	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.	Retain this condition
8	That no alcohol will be brought in to the premises by any customers at any time.	Retain this condition
9	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.	Reword to: There must be a minimum number of SIA door supervisors to the ratio of xx ration to be provided in agreement with the Police.
al wl a ev se git	The Licensee will only permit the sale of cohol for consumption off the premises here the alcohol is a specialist product, or gift in part of a corporate event. For rents which are promotional events, aled bottles of alcohol may be part of a it for people attending the event and stomers will be allowed to leave with ose sealed containers. This will be	Retain this condition

enforced by security confiscating open vessels on exit points.	
11 The Crowd Management Plan dealing with the dispersal and egress of guests will be in operation for every event held at the premise.	Remove as already contained in condition 1
12 That promotional literature and tickets will contain information regarding transport options and shall request that persons leave the area quietly.	Remove – this takes place when non licensable activities are taking place; this is a good idea but should be in EMP as unenforceable.
13 That SIA security staff and/or stewards to be briefed to monitor and remind patrons where necessary to leave the site quietly.	Retain this condition
14 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:	Retain this condition
 (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.	
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.	Reword to: 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.
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.	Reword to: A written record shall be kept of all staff authorised to sell alcohol; this staff record is to contain their full name.
17 That SIA security staff and/or stewards to be briefed to monitor and remind patrons where necessary to leave the area quietly.	Remove as repeated in existing conditions

18 A digital CCTV system must be installed in the premises complying with the following criteria:	Reword to: A digital CCTV system must be installed in the premises complying with the following criteria: (a) Cameras must be sited to observe the entrance and exit doors both inside and outside,
- Cameras must be sited to observe customer entrance and exit doors both inside and outside, the bars and floor areas.	 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 then 50% of screen. (d) Cameras overlooking floor areas should be wide angled to give an overview of the
 Where practical be capable of visually confirming the nature of the crime committed. 	 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. (b) Provide good quality images a calculated during operating times.
- Provide a linked record of the date, time and place of any image.	 (h) Provide good quality images – colour during opening times. (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.
 Provide good quality images during opening times. 	 (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.
- Have the recording device located in a secure area or locked cabinet.	(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
- Have a monitor to review images and recorded picture quality.	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.
- 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	Remove as contained in condition 1 the TTO is a public document anyway

available to council or police officers on request. 20 A last entry policy will be in place	Potein this condition
stopping guests from entering the site past 1:00am.	
21 The sale of alcohol will cease one hour prior to the site closing for events with a run-time to 06:00am. This will allow a one hour wind down unless agreed in advance with the responsible authorities.	Do the police make any amendment to this ?
22Prior to the organisation of any festival event; the premises licence holder shall have regard to the close proximity of the White Hart Lane Stadium and shall consult with Tottenham Hotspur Limited (premises licence holder) to collaboratively manage events that take place on any day a Football Association, Premier League or UEFA football match takes place at White Hart Lane Stadium and any other large- scale simultaneous events.	Remove as unenforceable. This will need to be dealt with by Broadwick and THS outside of the licensing process.
23 The Crowd Management Plan shall detail action to be taken by staff on the discovery of drugs on a person within the premises and will be in line with the premises Drugs Policy.	Remove as detailed in condition 1.

24 A personal licence holder shall be present on the premises and supervise the sale of alcohol, throughout the permitted hours for the sale of alcohol.	Retain this condition
	Add new condition:
	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.
	Or similar as per any request from the Police
Part M c) Public safety	
25 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 detailed in advance and reflected in the Event Management and Safety Plan.	Remove as this would be contained in Condition 1 and duplicated by other legislation
26 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	Remove as this would be contained in Condition 1

with the medical plan.	
27 The Licensee will ensure adequate means of escape to meet the capacity for any event, including any required infrastructure, for example, bridges, emergency exits are agreed with the Safety Advisory Group and are in place prior to the premises being open.	Remove as this would be contained in Condition 1
28 The security/crowd management plan will define the procedure and process for managing the numbers of people in each area to ensure that capacity is not exceeded.	Remove as this would be contained in Condition 1
29 The Youth and Vulnerable Persons Policy shall detail actions to be taken by staff upon identification of customer vulnerability and shall include but not be limited to: (a) Customer intoxication through drink and or drugs;	Remove as would be contained in Condition 1
 (b) Ejection of vulnerable persons; (c) Refusal of entry to vulnerable persons; (d) The use of advertising materials directing customers who feel vulnerable a member of staff. 	

30 All staff shall receive training that will assist them in identifying customer vulnerability and shall make interventions in accordance with the written Youth and Vulnerable Persons Policy.	Remove as would be contained in Condition 1
31 The incident and event log shall be kept on the premises and completed on each occasion an incident or event as listed below occurs:	Reword to: 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:
 (a) All crimes reported to the event; (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. 	 (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. Any other incident or event that impacts upon the promotion of the Licensing Objectives within the Licensing Act 2003
32 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.	Remove as would be contained in Condition 1.

33 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.	Retain
	Add New Condition
	Defer to the Police for any additional condition regarding provision of Shuttle buses .
Part M d) The prevention of public nuisance	
34That a comprehensive Noise Management Plan shall be devised and reflected as an Appendix to the Event Management and Safety 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 would be contained in Condition 1.

35That 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 would be contained in Condition 1.
36That 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 condition
37 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.	Remove – Remove as would be contained in Condition 1.

38Signs shall be prominently displayed on the exit doors advising customers that the premises are in a Public Space Protection Order Area (or similar) and that alcohol should not be taken off the premises and consumed in the street. These notices shall be positioned at eye level and in a location where they can be read by those leaving the premises.	Retain this condition
	Add new condition Any amplified sound arising from the Drumsheds and the Field shall not exceed 75dB $L_{Aeq 15 min}$ and 90dB $L_{Ceq 15 min}$ measured 1 metre from the boundary of any residential property between the hours of 09:00 – 23:00 and shall not exceed 45dB $L_{Aeq 15 min}$ and 65dB $L_{Ceq 15 min}$ measured 1 metre from the boundary of any residential property between the hours of 23:00 – 09:00.
Part M e) The protection of children from harm	
39That 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.	Retain this condition
40Clearly 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	Retain this condition

acceptable forms of proof of age are.	
41That suitable records are kept of all refused sales of age restricted products.	Reword to A record of refused sales shall be kept on the premises and completed when necessary.
42The operational procedure of all bars will adhere to the Event Management and Safety Plan.	Remove – Remove as would be contained in Condition 1.
	Add new condition 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.

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.

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Kind Regards

Esther Hughes Team Leader – Consumer Protection Chair – Enfield SAG