

# Annex 11

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

**Drum Sheds Only**

Ref: WK218074640

**From:** Esther Hughes

**Sent:** 10<sup>th</sup> 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 1<sup>st</sup> 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 8<sup>th</sup> April 2019. However, this will leave insufficient time for the SAG to consider these in advance of the last date for representations being Saturday 13<sup>th</sup> April 2019. (*Effectively the last working day would be the 12<sup>th</sup> 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
<b>M a) General – all four licensing objectives (b, c, d and e)</b>	
<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"><li>- Venue Operational Plan;</li><li>- Traffic Management Plan;</li><li>- Security/Crowd Management Plan;</li></ul>	<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"><li>(a) Venue Operational Plan;</li><li>(b) Traffic Management Plan;</li><li>(c) Security/Crowd Management Plan;</li><li>(d) Noise Management Plan;</li><li>(e) Risk Assessment(s);</li><li>(f) Drugs Policy;</li></ul>

<ul style="list-style-type: none"> <li>- Noise Management Plan;</li> <li>- Risk Assessment(s);</li> <li>- Drugs Policy;</li> <li>- Medical Management Plan;</li> <li>- Youth and Vulnerable Persons Policy</li> <li>- Any other associated documentation.</li> <li>- A plan showing these temporary non-fixed structures will be created and circulated as part of the operational plan for each event.</li> </ul>	<ul style="list-style-type: none"> <li>(g) Medical Management Plan;</li> <li>(h) Youth and Vulnerable Persons Policy</li> <li>(i) Any other associated documentation.</li> <li>(j) A plan showing these temporary non-fixed structures will be created and circulated as part of the operational plan for each event.</li> </ul>
	<p><b>Proposed new condition</b> 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><b>Proposed new condition</b> 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><b>Part M a)The prevention of crime and disorder</b></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"> <li>- Instances of anti-social or disorderly behaviour</li> <li>- Violence</li> <li>- Calls to the police or fire brigade</li> <li>- Abuse of staff and / or customers</li> </ul>	<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"> <li>(a) All crimes reported to the site;</li> <li>(b) All ejections of patrons;</li> <li>(c) Any complaints received;</li> <li>(d) Any incidents of disorder;</li> <li>(e) Any faults in the CCTV system;</li> <li>(f) Any visit by a relevant authority or emergency service.</li> <li>(g) Any other incident or event that impacts upon the promotion of the Licensing Objectives within the Licensing Act 2003</li> </ul>

<ul style="list-style-type: none"> <li>- Ejections of people from the premises</li> <li>- Visits to the premises by the local authority, police or fire brigade</li> <li>- Refused sales of alcohol</li> <li>- Any malfunction in respect of the CCTV system</li> <li>- Any other relevant incidents</li> </ul>	
<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"> <li>- Cameras must be sited to observe customer entrance and exit doors both inside and outside, the bars and floor areas.</li> <li>- Where practical be capable of visually confirming the nature of the crime committed.</li> <li>- Provide a linked record of the date, time and place of any image.</li> <li>- Provide good quality images during opening times.</li> <li>- Have the recording device located in</li> </ul>	<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"> <li>(a) Cameras must be sited to observe the entrance and exit doors both inside and outside, the alcohol displays and floor areas.</li> <li>(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.</li> <li>(c) Cameras viewing till areas must capture frames not less than 50% of screen.</li> <li>(d) Cameras overlooking floor areas should be wide angled to give an overview of the premises.</li> <li>(e) Cameras must capture a minimum of 16 frames per second.</li> <li>(f) Be capable of visually confirming the nature of the crime committed.</li> <li>(g) Provide a linked record of the date, time and place of any image.</li> <li>(h) Provide good quality images – colour during opening times.</li> </ul>

<p>a secure area or locked cabinet.</p> <ul style="list-style-type: none"> <li>- Have a monitor to review images and recorded picture quality.</li> <li>- Be regularly maintained to ensure continuous quality of image capture and retention.</li> <li>- Have signage displayed in the customer area to advise that CCTV is in operation.</li> <li>- Digital images must be kept for 31 days.</li> <li>- The police and authorised officers of the council will have access to images upon request</li> <li>- 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.</li> <li>- 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.</li> <li>- There must be a member of staff on site who can operate the CCTV when requested</li> </ul>	<ul style="list-style-type: none"> <li>(i) Operate under existing light levels within and outside the premises.</li> <li>(j) Have the recording device located in a secure area or locked cabinet.</li> <li>(k) Have a monitor to review images and recorded picture quality.</li> <li>(l) Be regularly maintained to ensure continuous quality of image capture and retention.</li> <li>(m) Have signage displayed in the customer area to advise that CCTV is in operation.</li> <li>(n) Digital images must be kept for 31 days.</li> <li>(o) Police will have access to images at any reasonable time.</li> <li>(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.</li> </ul>
<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 &amp; 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><b>Add new condition:</b></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>
<b>Part M c) Public safety</b>	

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
	<b>Add New Condition</b>

	Defer to the Police for any additional condition regarding provision of Shuttle buses .
<b>Part M d) The prevention of public nuisance</b>	
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><b>Add new condition</b></p> <p>Any amplified sound arising from the Drumsheds shall not exceed 59dB <math>L_{Aeq\ 5\ min}</math> and 68dB <math>L_{Ceq\ 5\ min}</math> measured 1 metre from the boundary of any residential property between the hours of 09:00 – 23:00 and shall not exceed 52dB <math>L_{Aeq\ 5\ min}</math> and 62dB <math>L_{Ceq\ 5\ min}</math> measured 1 metre from the boundary of any residential property between the hours of 23:00 – 09:00.</p>
<p><b>Part M e) The protection of children from harm</b></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 &amp; 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>

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

