



The Licensing Authority
Clockwork Building,
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Hammersmith, W6 9AR

Ref 2021/00393/LAPR

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New Grant for London Wonderground 2021 1 Empress Place London SW6 1TT

Dear LBHF Licensing Authority,

Please see below a further submission to my representation.

Further submission:

Further to my recent submission, the MPS would like to highlight the below concerns with regards to the application:

Counter Terrorism concerns

Officers and Counter Terrorism Safety Advisors (CTSA) from the MPS' Protective Security Operations have been consulted with extensively in regards to this application and their opinion sort in regards to the applicant's consideration and preparedness for a CT threat. In essence, it has been established that the current application and most recent Event Management Plan (EMP) submitted to SAG members contain no detailed written counter terrorism policy nor procedures reflecting the current threat and risks. Please refer to Appendix 1, which is the submission from CTSA Ian Rudge in regards to the concerns with the current application.

Security and stewarding consideration

The applicant has stated that the overall capacity of the premises will be 3,600. In regards to security provision, the applicant has proposed the following condition within the operating schedule:

"A minimum of one SIA licensed door supervisor shall be on duty at each entrance of the premises at all times whilst it is open for business"

As the premises only has one 'entrance', the applicant is effectively proposing that the premises will be conditioned to have a minimum of 1 SIA licensed door supervisor. Given that the applicant has stated that the capacity





would be around 3,600, this condition is not sufficient. The applicant has offered no further conditions that relate to security or stewarding provision.

It is worth noting the applicant has offered within the Event Management Plan the following security provisions on page 20/21:

- A **maximum** of **4** during Weekday daytimes until 5pm
- A **maximum** of **7** during Weekday evenings from 5pm and Weekends until 5pm.
- A **maximum** of **12** during Weekends from 5pm and Bank holidays.
- A **maximum** of **15** during Weekends where external events are taking place which may affect how busy the local area and, in turn demand for access to the site, such as match days at Stamford Bridge and Craven Cottage

As the above security numbers form part of the Event Manage Plan/Security Plan and are not are not conditioned on the application, this security provision would not be strictly enforceable. The above numbers are also inadequate, given the size and scale of the proposed premises.

Dispersal

To date, the applicant has proposed no conditions in relation to how they intend to manage the dispersal of hundreds if not thousands of customers, in what is predominantly a residential area.

The impact to local residents over the proposed 10-week period that the event is due to run is likely to be significant. The applicant has proposed to sell alcohol until 23:00 hours on all days with the opening hours as follows: Sunday to Wednesday 10:00-23:00 and Thursday to Saturday 10:00-00:00. With an anticipated dispersal time between 23:30 and 00:00 it is highly probable that a significant number of customers, many of which would have been consuming alcohol, are going to be dispersed into the residential areas in and around the immediate vicinity of the premises.

The obvious intention of the majority of these customers will be to leave the area via the nearest transport hubs or via taxi and mini cab. Arguably, the most convenient transport hub will be Earls Court underground station, however the most direct way to access this station is via two residential streets located in the RBKC, namely Eardley Crescent and Kempford Gardens. The applicant has not taken this into consideration nor offered any mitigation to prevent a public nuisance to those residents residing on these roads.

Further to this the EMP states that the advised taxi drop off point is Seagrave Road or any other road off Lillie Road (paragraph 4.15 page 6). All of these roads are residential in nature and continuous taxi pickups at 00:00 will likely cause a significant noise nuisance to local residents. Of note, there is a London Ambulance Service (LAS) station located at the Southern End of Seagrave Road. Any use of Seagrave Road for a taxi drop would likely cause operational issues for the LAS.

The exit to the premises is located directly next to another licenced premises. This premises is the largest 'pub' in Hammersmith and Fulham, with a potential capacity of around 800.





With the additional impact of this premises' dispersal, it is even more vital that a robust and detailed dispersal plan is provided and implemented.

As highlighted in Appendix 1, CTSA Ian Rudge has highlighted the need for the applicant to factor in the 'Grey spaces'. *Grey Spaces are those areas that fall outside of the recognised perimeter of the sites but nevertheless exist by virtue of that event or sites accessibility to the public. In the main, Grey Space will include primary ingress and egress routes as well as any predictable public desire lines between the Event space and transport hubs.*

The application and EMP have no reference to how applicant propose to manage this space and ensure the safety of their customers who are traveling to the premises. It would be best practise to have a sufficient number of stewards within these areas to ensure the safety of their customers as well as to help prevent rowdy or inconsiderate behaviour of customers leaving the premises. As such the MPS would expect to see a detailed dispersal plan attached to the application via a condition.

If the committee were minded to grant the application the MPS would recommend that the following conditions be added to the licence:

1. High-Definition CCTV shall be installed, operated and maintained, at all times that the premises are open for licensable activities or customers are on the premises and;
 - shall be checked daily to ensure that the system is working properly and that the date and time are correct. A record of these checks, showing the date and name of the person checking, shall be kept and made available to Police or authorised Council officers on request
 - at least one camera will show a close-up of the entrance/entrances to the premises, to capture a clear, full length image of anyone entering.
 - shall cover any internal or external area of the premises where licensable activities take place.
 - recordings shall be in real time and stored for a minimum period of 31 days with date and time stamping.
 - footage shall be provided to Police or authorised council officer within 24 hours of a request.
 - a staff member from the premises that is conversant with the operation of the CCTV system shall be on the premises at all times. This staff member will be able to show police or authorised officers of the Licensing Authority recent data footage with the minimum of delay when requested. This data or footage reproduction shall be almost instantaneous.
 - CCTV footage will be monitored in real time by a member of SIA licenced staff who has received the necessary training.

2. Body Worn Video - The licensee shall ensure that:





- (a) All licensed SIA door supervisors and security staff on duty at the event shall be equipped with Body Worn Video (BWV), capable of recording audio and video in any light condition as per the minimum requirements of the Hammersmith and Fulham Police Licensing Team,
 - (b) All recordings shall be stored for a minimum period of 31 days with date and time stamping, and
 - (c) the viewing of BWV recordings shall be made available immediately upon the request of Police or authorised officer throughout the preceding 31 day period.
 - (d) As a minimum, the following will be recorded where reasonably practicable:
 - All searches of members of the public (if not covered by CCTV)
 - All incidents of disorder
 - Any incident where use of force is required or implied (removing a customer for example)
 - Any incident declared as a critical incident
3. The premises shall operate a dispersal policy and all staff shall be trained in its implementation. The dispersal policy will cover the intended management of the 'Grey space' located between the premises and the nearest transports Hubs as well as the immediate vicinity of the premises.
 4. A written search policy will be in place and security staff will be briefed on the provisions of the policy to be aware of their responsibilities and actions required by that policy. The policy will include the procedure for searching prior to entry of customers into the licensed area. All bags will be searched prior to entry to the premises. Body searches will be carried out based on an ongoing dynamic risk assessment. Any customer refusing to permit to the search procedure will be refused entry into the licensed area. Any queues formed at the entrance to the site shall be supervised by security staff to prevent disorder and anti-social behaviour.
 5. A drugs policy shall be in effect and all necessary staff shall be trained in the implementation of the policy. The policy should be made available to police and authorised officers of the Licensing Authority on request.
 6. Any drugs confiscated from customers shall be stored in a locked and secured container. A log shall be maintained and kept with the drugs container. It will contain details of





date/time of finding, whom found by, when deposited, when collected by police, and signatures of depositor and collector. The police shall be contacted to empty the box when necessary.

7. A challenge 25 proof of age scheme for the sale of alcohol shall be operated at the premises where the only acceptable forms of identification are recognised photographic identification cards, such as a driving licence, passport or proof of age card with the PASS Hologram.
8. The premises licence holder shall ensure that the management team register and successfully complete the nationally recognised counter terrorism training product referred to as ACT eLearning package or can demonstrate that the ACT eLearning product has been successfully completed within the preceding 12 months (before the start of the proposed event/open to the public) and that all staff employed by or at the premises, including contracted and 3rd party complete the "ACT eLearning" training prior to them being employed on the premises.
9. The PLH, DPS, or other person employed or contracted by Underbelly to write counter terrorism protective security response plans, must attend an ACT STRATEGIC training session delivered by the Metropolitan Police Counter Terrorism Security Advisors to ensure that such plans reflect the current and emerging threat and risks from terrorism. This must be completed prior to the admission of the public
10. SIA licensed door supervisors will be on duty on the premises at all times it is open for licensable activities. The following numbers will be maintained as a minimum including a CCTV operator:
 - A **minimum** of **10** on Monday, Tuesday, Wednesday and Thursday daytimes until 5pm
 - A **minimum** of **15** on Monday, Tuesday, Wednesday and Thursday evenings from 5pm and Friday, Saturday and Sunday until 5pm.
 - A **minimum** of **20** on Friday, Saturday and Sunday from 5pm and Bank holidays.
 - A **minimum** of **25** during any day where external events are taking place which may affect how busy the local area is and, in turn demand for access to the site, such as match days at Stanford Bridge and Craven Cottage or Notting Hill Carnival etc.
11. Inclusive of the SIA licenced door supervisor numbers in condition 10, a minimum of **4** SIA licenced door supervisors shall be located at the Entrance/Exit at Empress Place





(Gate D on the site plans) at all times the premises are open to public to conduct the required searches and maintain a security presence.

12. Inclusive of the SIA licenced door supervisor numbers in condition 10, a minimum of **1** SIA licenced door supervisors will be posted on any emergency exit which patrons have access to.

13. On any day, after 5pm a **minimum** of 1 SIA licenced door supervisor shall be located at or within the following areas:
 - Beach area
 - Covered Bar area
 - Top Tent (When occupied by members of the public)
 - Udderbelly Theatre (When occupied by members of the public)

14. No sporting events shall be screened at the premises at any time.

15. Members of the public shall not be permitted to bring alcohol into the licensed premises.

16. No glass receptacles shall be used on site by members the public.

17. The licensee shall provide stewards/marshals to manage and facilitate the ingress and egress of customers within the 'Grey Space' between the entrance to Empress Place and the nearest Transports Hubs. These will include: West Brompton Underground station and Earls Court Underground station.

18. The licensee shall provide a traffic management plan that will include the junction of Empress Place, Lillie Road and Seagrave Road. This traffic management plan will include measures to be taken by the licensee to mitigate traffic congestion within the aforementioned junction if the flow of traffic is adversely affected by the ingress or egress of their customers.

Yours sincerely,





**METROPOLITAN
POLICE**

Pc Tom Stewart 4230AW



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