

From: Luke Elford <Luke.Elford@acuitylaw.com>
Sent: 12 September 2025 09:21
To: Tucker Matt: H&F <Matt.Tucker@lbhf.gov.uk>; Licensing HF: H&F <licensing@lbhf.gov.uk>
Cc: rob ebert <robertjebert@gmail.com>; Francis Charles: H&F <Charles.Francis@lbhf.gov.uk>
Subject: FW: Fulham Football Club - Notice of Hearing (17 September 2025)

Dear Matt/Licensing,

I write further to my previous emails in respect of this matter.

Please find attached a short set of written submissions on behalf of my client, Mr Ebert.

Please can you ensure that these are circulated to all parties prior to the Licensing Sub-Committee hearing on 17/09 at 17:30.

I would be most grateful for confirmation when that has been done.

Kind regards,

LUKE ELFORD

Consultant Partner | [Acuity Law](#)
[07876 030113](tel:07876030113) | Luke.Elford@acuitylaw.com

[BRISTOL](#) | [CARDIFF](#) | [LEEDS](#) | [LIVERPOOL](#) | [LONDON](#) | [SWANSEA](#)



[Click here to read our privacy notice](#)

Fulham Football Club Limited

Four (4) Applications to Vary Premises Licences:

- 1. 2025/01151/LAPR – Ground Floor Riverside Stand**
- 2. 2025/01152/LAPR – First Floor Riverside Stand**
- 3. 2025/01153/LAPR – Second Floor Riverside Stand**
- 4. 2025/01154/LAPR – Members' Club on Levels 3, 4, & 5 Riverside Stand**

Written Submissions on behalf of Other Person residing at 50 Ellerby Street

(Representations can be found at pp. 148-149 and pp.240-241)

1. These submissions concern four (4) applications (“the Applications”) to vary Premises Licences submitted by Fulham Football Club Limited (“the Applicant”).
2. It is acknowledged at the outset that the areas subject to the Applications already benefit from Premises Licences that authorise and regulate the Sale of Alcohol.
3. The Applications seek to introduce various forms of Regulated Entertainment on each floor as follows:
 - a. Ground Floor Riverside Stand – Plays, Films, Indoor Sporting Events, Boxing or Wrestling Entertainment, Recorded Music, and Performances of Dance (all indoors only)
 - b. First Floor Riverside Stand – Plays, Live Music, Recorded Music, and Performances of Dance (all indoors only)
 - c. Second Floor Riverside Stand – Plays, Films, Indoor Sporting Events, Live Music, Recorded Music, and Performances of Dance (all indoors only)
 - d. Members' Club on Levels 3, 4, & 5 Riverside Stand – Plays, Films, Indoor Sporting Events, Live Music, Recorded Music, and Performances of Dance (all indoors only)
4. The Applications seek these additional activities until 23:00 every day with no cooling off or wind down period proposed.

5. The Applications have caused great concern to a large number of residents that live nearby to the Premises.
6. Their concerns, including my client's, are extremely well articulated and set out for you in your Agenda Pack. I do not intend to repeat them here. They speak for themselves.
7. As things stand, the Applicant is seeking to introduce various additional Licensable Activities on each floor of the Riverside Stand until 11pm 365 days a year.
8. One might expect, or rather one *should* expect, that the introduction of these Licensable Activities would necessitate additional control measures (conditions) in addition to those already found on the Premises Licences that regulate the Sale of Alcohol.
9. The Applicant, at the time of writing, proposes no additional measures to control or mitigate the likely impact of the additional activities on the Licensing Objectives and that is of huge concern to my client and will also concern other residents.
10. It is not accepted that the introduction of the additional Licensable Activities does not warrant the Applicant, or indeed the Licensing Sub-Committee, from turning its mind to, thinking about, and proposing additional conditions to mitigate the very likely effects of the additional activities.
11. If, and it is of course a matter for the Licensing Sub-Committee, the additional Licensable Activities are granted, whether in full or in part, then appropriate and proportionate conditions must be attached to the Premises Licences to control them.
12. It is surprising that, given the wide-ranging nature of the Applications, no relevant representations have been received from Responsible Authorities. Given the strength of feeling regarding these Applications it is disappointing that no representations have been received from Responsible Authorities. The Applicant will say that this is a big tick in their favour. We do not agree that is the case.
13. Residents living near to these Premises put up with a great deal of disruption during the football season (roughly 8 months in every 12). To a certain extent that disruption is accepted and tolerated provided that it does not become overbearing. That is the nature of living within the footprint of a football stadium.

14. One of the key concerns regarding these Applications is the sheer intensification of use and how that may impact residents on non-match days and during their 4 months of relative peace and quiet. If the Applications are granted untrammelled then it is entirely permissible that the Applicant could host events at each of the Premises every single day of the year. That is an extremely unpalatable prospect for those living nearby. No information whatsoever has been given about the nature of entertainment, the types of events that might be held, or indeed any control measures that might be put in place to deal with likely impacts from those events.
15. It is noted that no capacities are given for the floors encompassing the Applications. Whilst capacity conditions are generally the province of conditions relating to Public Safety, information about the various capacities floor-by-floor will help to build a picture of how many people could be being entertained at this Premises at any one time. It is expected that the number will be significant. There is nothing proposed in the Applications that would stop all of the floors (5 in total) from being used concurrently.
16. Having taken into account the relevant representations, what the Sub-Committee must do in respect of the Applications is clear and is set out in Section 35(4) of the Licensing Act 2003. The Sub-Committee may:
- a. Modify the conditions of the Licence(s); or
 - b. Reject the Application(s) in whole or in part.
17. It is submitted that the Applications will require the imposition of a *significant* number of conditions, relevant to each of the additional activities requested, particularly higher risk activities like boxing, as well as noisier forms of entertainment like Live and Recorded Music.
18. It may be the case that the Sub-Committee feels that it would have to make sweeping changes to these Applications in order to grant them; changes that, by right, should have been proposed by the Applicant in its Applications.
19. In that case, the Sub-Committee may feel it has no option but to refuse the Applications.

Luke Elford

Acuity Law

12 September 2025