



**COMPLETE
LICENSING**

LITTLE LDN

Consultants Report

INTRODUCTION

1. I have been instructed to review the application for the proposed new premises at Unit 3A, Autumn Street and to give my opinion on the proposed operating Policies, Procedures and Conditions and whether or not these are adequate to ensure that the premises operates in a manner that fully supports the licensing Objectives. There have been a number of representations against the application from residents, the Local Authority and the Police.

SUMMARY OF EXPERTISE.

2. I retired from the police service on 2nd November 2012 having completed 31 years exemplary service with the Metropolitan Police in London. Between January 2012 and my retirement, I was employed as the Chief Inspector in charge of licensing for the London Olympic Games 2012. In this role, I headed up a team of officers with responsibility for supervision of licensing compliance at all the Olympic venues, including the Olympic Park. In addition, I was responsible for ensuring that any associated events were properly licensed, sufficiently staffed and operated in accordance with the licensing legislation and best practice to ensure the safe and effective delivery of the Olympic Games.
3. In addition to leading my team, I visited and worked with both the Olympic Park management and many other venues, reviewing their policies and procedures, and ensuring that the Games were delivered safely and securely. The success of this operation not only protected the reputation of the MPS but provided positive benefits for the profile of the MPS and the United Kingdom. I was awarded an Assistant Commissioners Commendation for this work.
4. Prior to this role, between Jan 2002 and January 2012, I was employed first as an Inspector and then as a Chief Inspector on the MPS Clubs and Vice Unit (Now SCD9 Serious and Organised crime command). My responsibilities over this period focussed on licensing and included day to day supervision of the licensing team that had a London wide remit to support the Boroughs with licensing activity.
5. Providing both Overt and Covert support for policing problem licensed premises across London, my team worked with premises when licensing issues were identified, to address these problems using action plans in order to raise their standards. Where this failed, I would support the Boroughs with evidence for use at review hearings if required. I devised and implemented the MPS strategy 'Safe and Sound' which sought to improve the safety of customers at licensed premises by reducing violent and other crime, in particular gun crime and the most serious violence. I also developed the



Promoters Forum and risk assessment process, and together these initiatives contributed to an overall reduction in violence in London of 5% and of the most serious violence and gun crime at licensed premises by 20% whilst I was there.

6. From 2004 until 2008, my role included representing the MPS and ACPO licensing lead both in London and Nationally. In this role, I developed key partnerships with industry, NGOs, and Government departments to improve the standards at licensed premises. I sat on the BII working party and helped develop the national training for Door Supervisors and worked with the SIA to successfully introduce the new regime within London. I sat on several Government working parties and worked closely with the alcohol harm reduction team on identifying best practice and ensuring this was used both within London and nationally by police and local authorities.
7. I was involved with Best Bar None for several years and successfully helped several boroughs to implement the initiative. I was a trained Purple Flag and Best Bar none assessor and, until my retirement, I sat on the Board for Best Bar None in the Royal Borough of Kensington and Chelsea. For the last five years of my service, I was in charge of licensing for the Notting Hill Carnival, the largest street carnival in Europe. During this time, I contributed to a reduction in violence overall at the Carnival and delivered increased seizures of illegal alcohol, reduction of unlicensed alcohol sales and a reduction in alcohol related violence. In addition to the above, I have attended many internal MPS training and qualification courses, and I am trained in conducting health and safety risk assessments and hold the National Certificate for Licensing Practitioners, issued by the British Institute of Inn keeping (BII).
8. Following my retirement, I set up a licensing consultancy to improve standards and provide independent advice for premises requiring a local authority licence. Since then, I have provided evidence gathering services and advice to a broad range of licensed premises on a variety of issues, including crime and disorder, noise and nuisance, cumulative impact, sexual entertainment, street drinking, rough sleepers, age related products, betting and gaming and planning. This work has involved premises that benefit from licences for activities such as alcohol on and off licences, betting premises licences, SEV licences and late-night refreshment. I have provided expert witness evidence at both local authority and appeal court hearings.



THE APPLICATION

9. The application is for a multi-use venue that will operate until 00.00 hours Sunday to Thursday and until 03.00 hours Friday and Saturday. Whilst there is good public transport to get to the premises early in the evening there is limited late night public transport in the immediate vicinity. However, Stratford Station is a major transport hub and is about one mile away with good provision of train and bus services and 24-hour buses and Central Line night-tube. The premises is close to The London Stadium, The ABBA Arena and other local attractions and is well served with Taxi's, mini-cabs and Ubers.

10. The premises has previously operated as a night-club, closing several years ago. Since then there has been residential development in the area. However, the police are of the view that with comprehensive policies, procedures and licence conditions in place it could operate as a night-club again while fully supporting the Licensing Objectives. The police representation requires that the applicant produce satisfactory Transport, Security and Welfare policies and to agree to twenty proposed Conditions.



TRANSPORT POLICY

11. I have studied the Traffic and Transport management plan that was produced on 29/01/2024. The plan recognises the challenges faced by the premises, particularly later at night closing when public transport options are limited. Customers travelling to the premises are unlikely to cause any issues with the relevantly modest capacity of 300, the good transport links nearby and the proposed last entry time before public transport ceases will ensure customers arrive in good time.
12. The management plan recognises that taxis, Mini-cabs and Ubers will be the main transport away from the venue and to this end have made the following provisions in line with best practice:
 - Lighting in the vicinity of the premises using temporary lighting if required.
 - Use of a dedicated taxi firm based close by who will be advised of closure times to ensure good provision when required.
 - Dedicated bays and marshalling system outside premises for picking up customers at premises.
 - Arrangement for Geo-located pick-up places for Ubers and similar on-line private hire vehicles.
 - A staggered egress over a protracted period of time, based on experience from sister venue that operates in a similar fashion.
 - Management of events and artists to assist with staggered dispersal.
 - A managed wind-down and dispersal policy including bar closure 30 minutes before premises closes, no re-entry policy, and gradual raising of lights towards the end of the evening.
13. The transport policy provides a comprehensive plan to manage the late-night egress of customers in an orderly and managed environment that is based on experience at a similar venue operated by the same operators and will ensure that there is minimal disruption to surrounding residential properties.
14. Whilst, as I have stated I have confidence in the operators to deliver on the plan, I note it has been agreed with the police and proposed as a condition should the licence be granted that "Should Tower Hamlets Council and Central East Police deem the transport plan is not working, then the concerns/failures will be presented to the venue in written form and the venue given 1 month to rectify them. Should the failures/concerns not be addressed to the satisfaction of the Local Authority and Police then the licence will be restricted to framework hours and a review of the premises licence submitted by those authorities within 1 month of the venue being restricted to framework hours".
15. This provides a very quick and effective solution should issues not be resolved as efficiently as the applicant states.



SECURITY POLICY

16. A Security Policy is included in the 'Venue Event/Safety Management Plan V2' dated 15/12/2023. This plan identifies that a Security Manager will be in overall control supplied by Centra security and security at the premises including Door Supervisors provided by Trojan Security, an East London based security firm. Para 2.3.5 identifies the strategic roles of the premises security staff including SIA door supervisors and key areas of operation. *Note: Crowd Management Plan from Trojan Security is still awaited as are details of proposed Designated premises Supervisor (DPS).*
17. The Security policy covers a wide range of operational areas. However, Police have identified a number of areas where they consider Licence Conditions are required to ensure the safe operation of the premises. Those that fall within the Security Policy are:

- Comprehensive CCTV and management/supervision of CCTV.
- Every event shall be individually risked assessed-
- Use of an Incident Log.
- Actions in event of a serious assault at the premises.
- Challenge 25 policy to be in place.
- Written Security policy.
- Use of ID Scanner for all customers at specified events.
- Suitable CCTV provision is covered in the Security policy.

AREAS CURRENTLY INCLUDED IN SECURITY POLICY

- Comprehensive CCTV provision is covered in Section 8.5 of the venue 'Event/Safety Management Plan'. If required this can be re-written to reflect the proposed Condition.
- *Event risk assessment is implied but not specifically covered in the plan and this should be included.*
- Use of an incident log is best practice and is included in the plan.
- Actions in the event of serious assault are included in the plan.
- Challenge 25 is covered in Section 4.0 of the Security policy and complies with best practice.
- Security Plan. A written security plan is included that covers the areas identified in the recommended police conditions. These are: ejections policy, search policy and crime prevention policy.



ADDITIONAL AREAS RECOMMENDED FOR INCLUSION

18. The number of SIA Door Supervisors is not specified and I recommend a minimum of 1 per 100 customers for late-night events (e.g. those that also require use of ID Scanner) in line with industry minimum guidelines. This may have to be increased subject to the individual risk assessment for the event.
19. Use of an ID scanner is not covered in the plan which specifies entry procedure of searching/search wand/Clicking to monitor numbers and Challenge 25. While these measures are suitable for low-risk daytime and early evening events there will be others where enhanced entry requirements are appropriate.
20. It is proposed that the premises will be hired out and this reduces the control over the premises and therefore increases the potential risk as the nature/management of some of the events will not lie with the applicant. I therefore recommend that when the premises is in use, for example, for late night and night-club events (and others subject to risk assessment) that ID Scanning is used in addition to searching in line with the police recommendation.



WELFARE POLICY

21. Welfare of customers is provided for with provisions set out in the 'Event/Safety Management Plan'. However, for ease of reference, and to comply with the proposed police Condition, I recommend a stand-alone welfare Policy to include those areas highlighted by police. The management of illegal drugs is covered in Section 8.2 of the 'Event/Safety Management Plan' and can be reproduced. The suggested use of Welfare Officers is best practice. These can be suitably trained existing members of staff or Door Supervisors, although dedicated Welfare Officers may be beneficial depending on the specific event and subject to risk assessment.



LICENCE CONDITIONS

22. Police have recommended Twenty (20) Conditions to be added to the licence. Having considered them they represent best practice and are common Licence Conditions for a premises such as that proposed to ensure promotion of the Licencing Objectives and I recommend they are accepted.

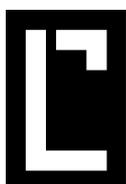
Consideration should be given to addressing the following areas that are not currently in the Event/Safety Management Plan to ensure compliance with the recommended Licence Conditions and Tower Hamlets Statement of Licensing Policy:

- Creation of a separate Welfare Policy.
 - The requirement for a Personal Licence holder to be on duty from 18.00 hours on Friday and Saturday night.
 - Inclusion in the 'Event/Safety management Plan' of minimum numbers of SIA Door Supervisors and the use of ID Scanning equipment for specified events (as shown above) and in consultation with police.
 - Documented training for all staff on Welfare and Vulnerability (Wave) and 'Ask for Angela' (to be included in Welfare Policy).
 - Work with local authority and Police to meet obligations under the Tower Hamlets Statement of Licensing Policy 2023 to 2028 in respect of the Women's Night Safety Charter and the prevention of drink spiking.
 - Documented Risk Assessments for all events.
 - Last entry provisions (Police recommend 01.00 hours but my understanding from the transport policy is that it will be before public transport stops running which may be earlier than this).
23. It would also be beneficial to identify who will perform the role of Designated Premises Supervisor (DPS) so that police can have confidence in their experience and ability to manage the premises safely and effectively.
24. The crowd management plan needs completing and attaching to the plan.



LOCAL AUTHORITY REPRESENTATION.

25. The representation from the local authority raises some concerns that relate to the historic operation of the premises, including unlicensed events that took place after the licence was handed in. These are not an indicator of what is likely with the premises under new operators.
26. Concern is raised about management of taxis picking up customers at the end of events. The present operating policy covers this area and there is a management plan in place to manage dispersal of customers and management of taxis and other private hire vehicles arriving to pick up customers leaving the premises.
27. The representation also raises concern about the management of the premises generally and specifically of those arriving at the site and leaving it. These are covered in the Event/Management plan and the traffic plan that is now available.



CONCLUSION

28. Having had the opportunity to review the Event/Management plan, Traffic plan and the associated documentation, as well as considering the representation received it is my view that, with the addition of the Conditions proposed by police and recommendations shown above, the operation of this premises in the manner described will support the Licensing Objectives.

