



**Brent**

**Alcohol and Entertainment  
Licensing Sub-Committee**

**Thursday 7 March 2024 at 2.00 pm**

**Boardrooms 5 & 6, 3rd Floor, Brent Civic Centre**

Additional Submission – FA Representations



**LICHFIELDS**

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**Date:** 6 March 2024

**Our ref:** 04929/48/NT/NB/JTh/30042818v1

Dear Sir/Madam,

## **Application for a Premises Licence Reference 30611 “Olympic Garden”, 3 Olympic Way, Wembley, Brent, HA9 0DL**

This further representation is submitted on behalf of our client, the Football Association (the FA), which owns and operates Wembley National Stadium (WNS), and further to the representation submitted on the 16 February 2024. We understand that it is not the normal practice of the Council to accept representations to the Licensing Committee less than 48 hours before a meeting, but we trust that this confirmation of WNS’s position, which is submitted as soon as possible after discussions with the applicant this afternoon and to assist the committee, will be accepted as a helpful exception.

Since its initial objection was submitted, the applicant has reached out to the FA and we have now met twice with the applicant, most recently today. Through constructive discussions between the parties, the FA has reached sufficient agreement with HEB Commercial Limited on the details of the proposed operation to **remove its opposition this licencing application on basis that the amended conditions detailed in the ‘Operating Schedule’ attached, which have been discussed with the applicant, are attached to any Premises Licence issued.**

In the event this further written representation is not accepted, or in any event if necessary in response to other submissions, we and the FA reserve the right to participate in tomorrow’s meeting.

Please contact Nick Baker or Joe Thompson if you need to discuss.

Yours faithfully,



**Lichfields**

Copy            Tom Legg, the FA/WNS  
                    Ewen Macgregor, TLT

**OLYMPIC GARDEN**

**3 OLYMPIC WAY**

**BRENT**

**HA9 0JT**

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**Operating Schedule**

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Hours of Operation

- Opening Hours  
On each day of the week – from 1000 to 2230
- Provision of licensable activities  
On each day of the week – from 1000 to 2200

**Conditions**

**General**

1. The licence will run for a period of 24 months (unless otherwise extended following an application to the licensing authority) from the first day of operation.
2. The licensing authority, Wembley National Stadium (**WNS**) and responsible authorities will be notified when the licence is due to become operational.
3. Non-intoxicating beverages, including [free](#) drinking water, shall be available in all parts of the premises where alcohol is sold or supplied for consumption on the premises.
4. Any locks or flush latches on exit doors shall be unlocked and kept free from fastenings other than push bars whilst the public are on the premises.
5. Opaque screens, of a height of no less than 1.5m shall in place on the frontage of the premises on to Olympic Way.
6. At all times when the premise is in use, a minimum of 1 member of staff shall be designated to clean the areas and prevent the accumulation of litter.

7. The premises shall maintain a live Safety Management Plan ('SMP') that shall contain all the document that is required and necessary to operate a safe premises.
8. The SMP shall be risk assessed, reviewed and revised as is necessary, and shared with the licensing authority, WNS and the responsible authorities in draft for comment 14 days prior to each football event day unless an alternative frequency is agreed with all parties. Comments on the draft will be considered and incorporated as necessary before a final version is circulated at least 48 hours in advance of each football event day~~on request.~~
9. The SMP shall include, but not limited to, ~~policies relating to~~ the following: -
  - a. Site plan
  - b. Detail of the Premises licence
  - c. Pre premises opening schedule of works
  - d. Health and Safety Responsibilities
  - e. Fire Risk Assessment
  - f. Crowd Management
  - g. Evacuation Plan
  - h. Barriers and boundary treatments, including any advertising
  - h.i. Measures to manage entry queuing and egress
  - h.j. Electrical Installations and Lighting
  - h.k. Provision of SIA including the number of stewards for each type of event
  - h.l. Food and Alcohol
  - h.m. Sanitary Facilities
  - h.n. Waste Management
  - h.o. Sound: Noise and Vibration
  - p. Facilities for People with disabilities
  - q. Measures to mitigate projectile risks, such as full cover netting
  - e.r. Measures to secure furniture and fittings
10. The premises licence holder shall comply with the SMP at all times.
11. A copy of the SMP will be provided to the licensing authority, responsible authorities and WNS ~~on request~~ in advance of the Premises opening and whenever it is updated.
12. The premises licence holder will become a member of, actively participate in and support, and at the request of WNS, be a participant in, the Zone Ex Coordination Group.

## Prevention of Crime and Disorder

### CCTV

- 13.** A digital hard drive CCTV system shall be in operation to cover internal and external areas of the premises and any area where customers have legitimate access shall be sufficiently illuminated for the purposes of CCTV
- a. All CCTV recorded images shall have sufficient clarity/quality/definition to enable facial recognition
  - b. CCTV footage shall be kept in an unedited format for a period of 31 days; any footage subsequently produced shall be in a format so it can be played back on a standard personal computer or standard DVD player.
  - c. Any manager left in charge of the premises shall be trained in the use of any such CCTV equipment and able to produce/download/burn CCTV images upon request by an authorised officer from a Responsible Authority
  - d. CCTV shall be maintained on a regular basis and kept in good working order. CCTV maintenance records to be kept details of contractor used and work carried out to be recorded.

### Incident Log

- 14.** An incident log shall be kept at the premises, and made available on request to an authorised officer or the Police, which will record the following:
- a. All crimes reported to the venue
  - b. All ejections of patrons
  - c. Any complaints received
  - d. Any incidents of disorder and violence
  - e. All seizures of drugs or offensive weapons
  - f. Any faults in the CCTV system or searching equipment or scanning equipment
  - g. Any visit made by a relevant authority or emergency service.

### Door supervisors

- 15.** Save for event days including football event days when there shall be minimum of 1 member of door security for every 50 expected customers (calculated on the basis of the below football event capacity figures at condition 27). the requirement for SIA licensed door supervisors shall be on a risk assessed basis.

16. A copy of the door supervisors risk assessment shall be kept on the premises and made available for inspection by an authorised officer of the Police and/or the licensing authority
17. Where door security are employed, a register/log containing the following shall be kept and made available for inspection by an authorised officer of the Police and/or licensing authority
  - (a) names,
  - (b) badge number,
  - (c) dates & times of duty of security staff and
  - (d) any incidents that occur .
18. SIA supervisors shall wear clothing that can be clearly and easily identified on CCTV.
19. On Event days, excluding football event days, there shall be at least two member of SIA security whose sole responsibility will be to monitor and manage the outside area, from 2 hours before the start of the event taking place at Wembley stadium until 1 hour after the end of the event.
20. A copy of the risk assessment shall be kept on the premises and made available for inspection by an authorised officer of the Police and/or the licensing authority

#### **Prevention of Public Nuisance**

21. Notices asking customers to leave quietly shall be conspicuously displayed at all exits.
22. The placing of bottles into receptacles outside the premises shall not be permitted between 2200 and 1000 hours the following morning.
23. Customers shall not be permitted to take open drink containers beyond the boundary of the premises as defined on the deposited plan

#### **Public Safety**

24. [There shall be no direct access into the premises from Olympic Way unless as directed by an officer of the Police or the licensing authority.](#)

24.25. Exits shall not be obstructed and clear signage of emergency exits shall visible

**25.26.** The premises will have a written fire risk assessment, a copy of which shall be made available to the Licensing Authority, WNS, and authorised officers of the responsible authorities, on request.

**26.27.** The maximum capacity of the premises shall be limited as follows:

- NON EVENT DAYS = 350
- EVENT DAYS = NON-FOOTBALL

To be risk assessed depending on the event.

Low-mid risk (to be determined in consultation with the Police) 350

High risk (to be determined in consultation with the police) 275

- EVENT DAYS FOOTBALL - 275
- [EVENTS OF NATIONAL SIGNIFICANCE – 275](#)

**27.28.** This risk assessment shall be appraised at least annually

**28.29.** Adequate and appropriate first aid equipment and materials will be kept on site, regularly checked and kept in an easily accessible place for staff.

### **Protection of Children from Harm**

**29.30.** A Challenge 25 policy shall be implemented, and full and appropriate identification shall be sought from any person who appears under the age of 25. The only acceptable forms of identification shall be passport, photo driving licence, and those carrying the PASS logo.

**30.31.** Challenge 25 and proxy sale signage to be displayed at each point of sale

**31.32.** A sales refusal book shall be kept at the premises, and this shall be checked each week by either the premises licence holder or the designated premises supervisor to ensure that staff are accurately recording refusals.

**32.33.** The refusal book shall be open to inspection by appropriate officers of the Responsible Authorities.

**33.34.** A sign stating "No proof of age -- No sale" shall be displayed at the point of sale.



## Football event days

34.35. The following additional conditions will apply on football event days at all times unless agreed in advance in writing with the Metropolitan Police and subject to the premises conducting an appropriate risk assessment:

- (a) A "Football Event Day" means any day when there is a major event at Wembley Stadium involving UK based domestic association football teams where the expected attendance is over 51,000 people. [A football event day includes a day with Events of National Significance.](#)
- (b) The premises shall only take one set of supporters on the production of a valid ticket for the game
- (c) The designated team will be allocated by the Metropolitan Police after a risk assessment has been conducted.
- (d) Door security will be employed and the conditions relating to the provision of door security as outlined above will be complied with
- (e) At least one SIA registered door supervisors shall be on duty from [stadium opening to the public 4 hours](#) before the designated kick off time (or from when the premises opens if [later than the stadium opening less than 4 hours](#) before the designated kick off time) until 30 minutes after the premises is closed for licensable activities.
- (f) The DPS or deputy shall work in partnership with the Police and, if necessary, comply with any direction given by a senior Police or Council Officer on duty at the event.
- (g) Moveable furniture in premises shall be removed
- (h) No children under the age of 16 shall be admitted unless accompanied by an adult.
- (i) The premises shall stop the sale of alcohol to 1 hour before the advertised kick off time
- (j) The premises will close no later than the advertised start of half time and will not re-open until the start of permitted hours on the following day
- (k) Queuing patrons shall not be allowed to encroach on to Olympic Way.
- (l) All barriers are the responsibility of SIA door supervisors during football event days.

- ~~(m)~~ Customers shall not be allowed to congregate outside the premises facing Olympic Way.
- (n) Save in exceptional circumstances, a personal licence holder, or suitably trained deputy, shall be present on the premises from at least 4 hours before the start of the Football Event (or from when the premises opens if less than 4 hours before the designated kick off time) until at least 1 hour after the Football Event
- (o) The premises will not show televised football matches on football event days at Wembley Stadium.
- (p) The premises licence holder will have a dispersal and queuing policy a copy of which will be kept on the premises and made available to the responsible authorities on request
- (q) No football club colours (for example flags, shirts, banners) to be displayed on the external fencing of the premises on football match days