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Date: 5th September 2022

Police representation to the application for a new Premises Licence for 'The East Village', Wembley National Stadium, Olympic Way, Wembley, HA9 0WS.

I certify that I have considered the application shown above and **I wish to make representations** that the likely effect of the grant of the application is detrimental to the Council's Licensing Objectives for the reasons indicated below.

Officer: James Clarke PS 354NW

Brent Police Licensing Sergeant

An officer of the Metropolitan Police, in whose area the premises are situated, who is authorised for the purposes of exercising its statutory function as a 'Responsible Authority' under the Licensing Act 2003.

I acknowledge receipt of a Premise Licence application under section 17 of the Licensing Act 2003. The proposed site is The East Village External Concourse, Level 1, East Wembley Stadium, Wembley HA9 0WS.

On Behalf of the Commissioner of Police of the Metropolis, I object to this application on the grounds that the Prevention of Crime and Disorder, Public Safety and Prevention of Public Nuisance Objectives will be undermined.

The applicant, Wembley Stadium has applied for the following licensable activities: Alcohol sales and regulated entertainment Monday to Sunday, between the hours of 1100-2130 hrs.

I am Sergeant James Clarke and I am the licensing Sergeant for the North West Basic Command Unit. I oversee the licensing departments of Brent, Harrow and Barnet.

The East Village of Wembley Stadium is situated on the **East side** of the stadium, above the coach entrance and is on an elevated platform. (This has an approximate height of 20-30 ft. This proposed area is **on the concourse**. It is proposed that this part of the concourse, a fan zone would be an area for 4000 fans to gather prior to football matches and concerts. The

application also envisages that the premises will also be used for other events; such as Christmas and local markets.

Crime and Disorder

The proposed site is near to the coach entrance and there is usually a police presence near as there is always a concern that fans may cause issues with the coaches gaining entry or even attacking the coaches with the teams in them. Fans have no reason to gather above this entrance at the moment as there are minimal facilities. There is also a risk of them throwing items onto the coaches and, for the reasons set out Exhibit JC/1, I do not feel that the application adequately deals with this risk.

Complications may also arise with opposing fans mixing at the football matches. At the moment Wembley is divided into East and West and the public houses are advised that one set of fans can use the East side pubs and the others use the West. The idea is to stop the fans coming together until they get to Wembley stadium so there is a reduced risk of disorder. Indeed, a large concentration of one set of fans just outside the stadium would be a tempting target for any opposing fans who might be looking to cause trouble.

Many fans come via coach and use the pink and yellow car parks to the East of the stadium. There is also a club, Crystals in South Way Wembley that opens on match days and will take one set of fans. Crystals is a large venue with a capacity of 2000. Although they will follow the split of fans suggested, they have sometimes gone against this and taken fans who were travelling by coach and parked nearby as this was more convenient. In order to prevent fans mixing and causing trouble, the fans travelling by coach, the fans going to Crystals, and those fans using the East Village will need to be seated in the East stand and all contain the same set of supporters. As the car parks and Crystals are private businesses there is no compulsion to do so and I do not believe that they have been consulted prior to this application. Each game would rely on negotiating with these outside parties in advance with no guarantee of their cooperation. Police can assist the applicant but would have preferred that these conversations were had prior to the application being submitted.

The proposed site of the East village is considerable and takes up space on the concourse that usually is used by fans as a walkway. The concourse is not controlled and fans are allowed to walk freely.

Anything of this size on the concourse would create interest and there is potential for a crowd to gather around the East Village. These could be fans who are curious or who are trying to get inside. There is also a likelihood that fans of the opposing team could go there to try and intimidate or aggravate the fans inside. There is nothing to prevent this from happening at the moment.

There are 5 lanes into the venue from the north and 3 to the south for exits. Both of these appear to be only a few metres from the stairs. I believe that there will be queuing into the premises that will stretch from the venue onto the stairs, causing further health and safety concerns. I would also like to know why there are more entrance lanes than exit lanes and whether crowd flow rates have been considered. Whilst the proposed conditions state that the premises will be closed 30 minutes before the expected start time of the event, it is reasonable to assume that persons on the premises will remain on the premises drinking

until the premises closes. This will result in a large exodus of people from the premises which will roughly coincide with the same peak flow times identified in the FA Crowd Planning document (the peak 15 minute period is based on the study on ingress being between 1926 and 1941 on that occasion, so between 19 minutes and 34 minutes prior to the kick off for any other match).

As the crowd enter there is an 'activation container' near the entrance which will force the entering fans together at that point. There are 12 toilets and 2 accessible toilets planned, I would like to know if these are enough for 4000 people. It appears seventeen SIA staff are being employed at this premises, Police would like assurances that this number is sufficient and how this number was arrived at. Whilst the application does include a sketch of the proposed structure on the premises, it has not been possible to assess whether any structures are suitable as they have not yet been built.

Wembley Stadium is an obvious target for a potential terrorist attack given the large number of people congregating at predicted dates and times. Whilst the security procedures with respect to the stadium itself may be adequate, it is not clear that the East Village will have the same level of security and protections against a terrorist attack. Given that this proposed site is directly outside the stadium, I would expect to see a similar level of protection and security. The fencing proposed would not provide any (or at least very limited) protection against a terrorist attack. Similarly, the fencing proposed could easily allow for articles (such as drugs, tickets, bladed articles and offensive weapons) to be passed through the netting. The application does not set out how these risks will be addressed. The fencing itself is described as 'fence in a bag' and does not have a security rating at this present time. It also needs to be secure, at least 1.8 metres in height and have anti climb characteristics.

By way of comparison with other large licensable events in open spaces, security measures will typically include dual perimeters to prevent items being passed into the event. They will often employ metal detectors, searching by security, drugs detecting dogs and bag searches prior to entry similar to airports style security. Again, it is not clear that this level of security will be afforded to the East Village. I also have concerns about the lack of proposals in place to prevent entry to the premises by those using fraudulent tickets and what measures the applicant will take to prevent individuals coming in who may be subject to Football Banning Orders.

There are also concerns with the policing of such an area. Whilst there is security involved, police may have to attend to deal with situations inside an enclosed area of potentially hostile supporters. There are also practical issues for emergency services in general. The nearest entrance is up a few flights of stairs that would be hard to access for Ambulance services if they had to attend.

Public Safety

In my opinion there are a number of issues that make this an unsuitable area for the East village. Police attended a site visit and noted that the area was next to the edge of the concourse where there was a large drop (approx. 20-30ft in height), that would be a danger. During the European championship Police saw first-hand the worst of fan behaviour whilst drinking, this included fans climbing on structures until they collapsed. The edge of the concourse could be climbed on easily and Police are concerned that the concentration of

fans with access to alcohol close to this could cause an issue. I have heard of fans falling from heights around the stadium before. Police are not satisfied with the fencing and security measures proposed by the applicant. PC Aran Johnston, from the NW Design out Crime Office, has prepared an analysis of the fencing and security which is exhibited as JC/1.

Whilst the majority of football fans are well behaved, some are more likely to drink for longer and to excess at major or significant fixtures. Wembley, being the national stadium, will typically host these type of games and so will have a higher risk of problems of this. Fans are likely to be vociferous and confrontational and this behaviour is more likely to cause incidents.

Prevention of Public Nuisance

Police are concerned about Public Nuisance as nearby residential flats are in close proximity to the proposed East Village.

Wembley Stadium has conditions on its licence about noise and they appear to be very strict but they are for an arena that has been specifically designed for the purpose of entertainment, the concourse is not. 4000 people on the concourse are going to naturally create noise. Local residents are likely to be used to living next to the stadium but this fan zone being in close proximity to them is likely to cause annoyance. I would like to see where noise management has been considered.

The layout of the premises is also of concern. Looking at the documents it appears that the area of the premises is 1700 square metres. I do not believe that this is a big enough area for 4000 people. The structures inside the east village, including bars, staff access walkway and the oval structure also need to be subtracted from the figure of 1700 square metres to accurately show how much room there is for the fans and staff. There are 5 lanes into the venue from the north and 3 to the south for exits. Both of these appear to be only a few metres from the stairs. Police have concerns in relation to queuing into the premises that will stretch from the venue onto the stairs, causing further health and safety concerns

The police are unable to consider this application in full as not enough information has been received.

I respectfully ask that this application be refused.

Yours Sincerely,

James Clarke - Licensing Police Sergeant