



Brent Council

[www.brent.gov.uk](http://www.brent.gov.uk)

Design Out Crime Office  
North West DOCO Office,  
Ruislip Police Station,  
The Oaks,  
Ruislip,  
HA4 7LE  
Telephone: 0208 7333703  
Email:  
DOCOMailbox.NW@met.pnn.police.  
uk  
[www.met.police.uk](http://www.met.police.uk)  
Your ref:  
Our ref:

Good afternoon,

Thank you for allowing me to comment on the proposed new **Premises Licence application for East Village, External Concourse at Wembley Stadium**. I have had no direct contact with the applicant in relation to this proposal. I have been asked to provide comment from the licensing supervisor PS Clarke.

Please refer to Appendix A for illustration of crime figures and local as well as national planning policy

The venue falls within the policing ward of Tokyngton. The top reported crimes for the month of May 2022 (taken from the police.uk website) are violence and sexual offences, antisocial behaviour, other theft and drugs.

I **do not** support the application for the following reasons:

- Detail of the width of the concourse where the East village will be located is mentioned within the documentation and it is the largest section around the stadium. It is located also in between two (2) main staircases which provide access onto the concourse. During event days at the stadium this area will be very busy with a large amount of footfall. It is mentioned also that this area is prone to queues forming to enter the stadium. It is felt that the reduction in space at this location (despite the current width) will create a pinch point creating a large concentration of persons within a small area.
- This proposal leaves a lot to the management of the East village. It should not fall on further police resources to manage this area/facility.
- The barrier for this area has been detailed as a 'fence in a bag'. Previous to this request I had not heard of this type of perimeter. Conducting some research into this it would appear that the fencing (although designed for crowd control) is not security rated. The documentation does not detail the height and size of this boundary. The area needs to

be secure and have a boundary height in excess of 1.8 metres (preferably higher) and have anti-climb characteristics.

- It was discussed that there will be multiple lanes at the single entry point where is will be the designated home fans (with valid stadium event ticket) permitted entry. The same lane system will be used on exiting the area. What is the proposal for emergency access/egress?
- Is there a set procedure for a potential police serial to enter without causing possible harm to other members of the public within this area?
- What security checks and searches will be in place prior to entering this area? The security of this area and the safety of the visitors is paramount. It was established that no bags will be permitted into this area and I support this measure.
- Heights and robustness of barriers needs to be on point as scenes from Wembley and the Euro final are not in distant memory.

It is felt that the proposal in this area will pool together a large amount of people making them vulnerable and a potential target for crime or possible attack.

If however, this application is successful, **I strongly recommend the following:**

- Sterile service area at the rear of the concession stands/trailers to create a defensive barrier to prevent persons climbing or throwing objects over the stairs onto members of the public and also the VIP and team coach entrance. There was mention that during some events the set up could change (different food/merchandise). If this is the case the service area protecting the stairs and entrance needs to be maintained. There can be no vulnerabilities.
- Protect the stair area by increasing the height of the railings. This possibility was discussed at the site visit and something which could be easily implemented. Ensuring the fixings cannot be easily removed. Again this was discussed on the day and appeared not to be an issue.
- Looking at the images of the fence system being set up it still appears as if a knife could be passed through the gap or drugs. I would like clarification that this cannot be feasibly done. The other concern is the tension of the mesh and whether this barrier would afford any protections when it came to possible crowd surges. With this in mind it is recommended that a secondary line be implemented to mitigate against the risk of items being passed through and also have a defensive gap where crowd surges could move into without the fear of causing injury to the persons contained within this area. The maximum number within this area may need to be reduced to accommodate this. The quick release system will also need protection. It was discussed that a member of security would be present at this location at all times and in the event of an emergency the lever can be pulled and one side of the mesh fencing can be swiftly taken down. Without this presence this feature could be abused.
- Consider the location of features within this area to minimise crowding at entrances and exit which could lead to a crushing scenario.
- The position of the toilets should not provide a climbing opportunity to gain access onto other parts of the enclosure.
- What is the proposed management plan for this area and the number of staff (including locations). Staff should also be patrolling within the enclosure to mitigate the risk of theft from person (dipping).
- The site needs good lines of sight with minimal or no opportunities for concealment.
- Proof of training into CT focussed issues such as hostile recon etc. Full training in the deployment of the perimeter and emergency collapse of one of the panels. Speak with the CTSA for further requirements

I feel a demonstration of the fencing/barrier solution would be of benefit. Other companies may have security rated options to explore.

The advice I have provided has been taken from the following guides:

[https://www.securedbydesign.com/images/downloads/HOMES\\_BROCHURE\\_2019\\_update\\_May.pdf](https://www.securedbydesign.com/images/downloads/HOMES_BROCHURE_2019_update_May.pdf)

[https://www.securedbydesign.com/images/downloads/SBD\\_Commercial\\_2015\\_V2.pdf](https://www.securedbydesign.com/images/downloads/SBD_Commercial_2015_V2.pdf)

The advice has been adjusted taking into consideration crime statistics and analysis of the area.

Kind regards

Aran

## Appendix

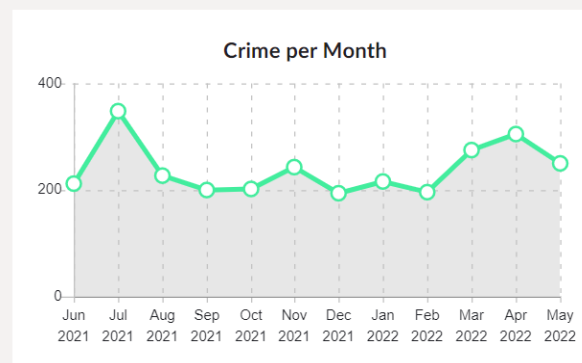
### Top reported crimes

Most commonly reported crimes during May 2022

Violence and sexual offences	71
Anti-social behaviour	48
Other theft	27
Drugs	22

### Crime levels overview

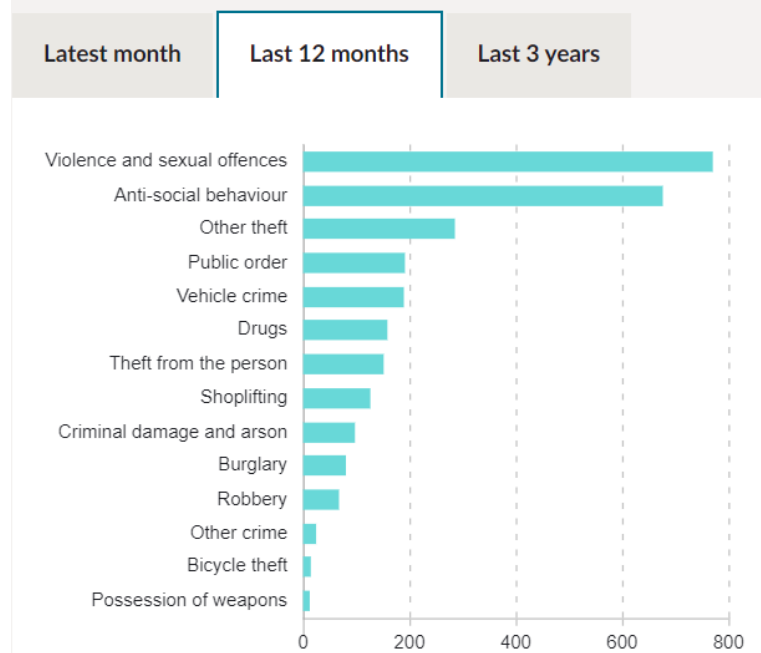
Crime for last year



The above charts indicate the top crimes for Tokyngton ward for May 2022 along with crimes per month over the past year.

### Crime types description

for the last 12 months (from Jun 2021 to May 2022)



The above illustration shows the number of crimes on Tokyngton ward over the past twelve (12) months

Type	Total	Percentage
Anti-social behaviour	678	23.6%
Bicycle theft	16	0.6%
Burglary	82	2.9%
Criminal damage and arson	99	3.5%
Drugs	160	5.6%
Other theft	287	10%
Possession of weapons	14	0.5%
Public order	193	6.7%
Robbery	69	2.4%
Shoplifting	128	4.5%
Theft from the person	153	5.3%
Vehicle crime	191	6.7%
Violence and sexual offences	772	26.9%

*List and number of reported crimes for Tokyngton ward over the last twelve (12) months*

### **Section 17 of the Crime and Disorder Act 1988**

“It shall be the duty of each Authority to which this section applies to exercise its various functions with due regard to the likely effect of the exercise of those functions on and the need to do all it reasonably can to prevent Crime and Disorder in it’s area”, as clarified by PINS953.

The NPPF and Camden’s own local guidance can support this proposal:

Section 91 of the NPPF states:

*Planning policies and decisions should aim to achieve healthy, inclusive and safe places which..*

*b) are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion – for example through the use of clear and legible pedestrian routes, and high quality public space, which encourage the active and continual use of public areas;.....”*

Section 127 of the NPPF further adds:

*Planning policies and decisions should ensure that developments..*

*f) create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users, and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience .....*

**From the London Borough of Brent Local Plan – Development Management Policy.**

Subject to other policies within the development plan will be acceptable provided it is;

(f) Safe, secure and reduces the potential for crime.

**2.10** Developments should be safe and not expose users or those in neighbouring areas to an unacceptable risk of danger. In seeking to limit the potential for crime the preference is through good design related to factors such as the layout, use, building orientation and materials, as well as security deterrents such as locks, fences, alarms and CCTV.