

Sue Dowling

From: Sue Dowling
Sent: 12 September 2022 14:21:18
To: 'James.M.Clarke@met.police.uk', 'James.Moulding@met.police.uk'
Cc: 'Paul.Scott9@met.police.uk', 'Tom Legg', 'Sarah Wellington', 'Legister, Linda', 'Paul Scannell', 'Stuart Doyle', 'Alex.McLachlan@met.police.uk', Belinda McGarry, Benjamin Cowdry
Subject: FW: (FOO10/10) Response to BBL, NW BCU Representation
Importance: High
Sensitivity: Confidential
Attachments: Final Introduction served (2) .docx, Final Schedule served 9 September .docx, Final conditions as served _4896227_1.docx.docx

Dear James

**The East Village, External Concourse, Wembley Stadium
New Premises Licence application
Response to Brent Borough Licensing, NW BCU Representation**

I hope you are well and your leave was good.

Thank you very much for providing us with a copy directly of the above Representation of 5 September. Since receipt, our Clients have been working through your observations (and those of PC Aran Johnston of the DOCO) in order to hopefully clarify matters and resolve any remaining issues.

I therefore now attach for your and your colleagues' consideration:

1. WNSL's Response which forms two parts:
 - a. Introduction to the Scott Schedule – this also puts the application into context; refers to the expanded conditions and draws some conclusions, and
 - b. Scott Schedule – summarising your observations; responding to them and referencing relevant documentation.
2. Amended draft conditions – we have expanded the draft conditions – please see blue additions which you will note also include specific 'ramp up' conditions and a condition concerning the fencing when the Premises will be used as a fan zone at a (GSC) football fixture (19(iii)).
3. Appendices List - the documents referred to in the Appendices to the Schedule which have not already been provided to you/your colleagues are attached.

In relation to all of the supporting documents, we shall be discussing with the Licensing Authority which (if any) should be put in the public domain in advance of the Hearing on 23rd September. The full appendices will be available to the Committee Members if the Hearing is effective. Obviously our Clients have no difficulty with the Police and with the Licensing Committee members considering all the appendices but as some of the documents contain sensitive (security and other) information (and as there are no other objections), it would be sensible for them not to be widely available to the public at large.

If you are missing any of the appendices (as they have been sent to various officers in the MET) do let me know and I will let you have another copy.

We appreciate that the attached will take you time to reflect on, but we hope that in view of the additional

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offered conditions and the detail provided in the Schedule, the Representation can now be withdrawn (subject to the Licence being granted subject to the expanded conditions). Please confirm your position as soon as possible and please do call me if a discussion would be helpful (mobile 07774127269).

With best regards
Sue

The attachments (referred to in the Appendices List), not already in your possession, will follow separately to avoid server overload!

Sue Dowling

From: Sue Dowling
Sent: 09 September 2022 10:02:28
To: James.M.Clarke@met.police.uk, Legister, Linda
Cc: James.Moulding@met.police.uk, Tom Legg, Sarah Wellington, Stuart Doyle, Benjamin Cowdry, Paul Scannell
Subject: Appendices - NOT CONFIDENTIALITY AND EXCLUSION FROM PUBLIC DOMAIN (FOO10/10)
Attachments: Appendices Index_4894254_1.docx.docx, Harry Styles 2022 - Method of Management v5.pdf, 23271407-STR-GEN-XXX-SK-D-01301 - REV P0.pdf, Special Safety Certificate - Concert - Harry Styles v2 Sat 18 and Sun 19 June 2022.pdf, Appendix 2 GSC CONTENTS..pdf

Dear James, and Linda

Further to my email just now, here is the List of Appendices referred to in the Response to the Representation.

Appendices 1, 3, 4, 5 and 7 have already been provided to the MET but James, please do let me know if you require further copies directly.

Appendix 8 is a public document and can be accessed through this link [Baroness Casey review into events at the UEFA EURO 2020 Final has been released \(thefa.com\)](https://www.thefa.com/uefa-euro-2020-final).

In relation to Appendix 6, I attach documents relating to the recent Harry Styles concert where the 'East Village' space was used for non-licensable activities. **PLEASE NOTE that these documents must not be disclosed to the public at large as part of this licensing application as they contain sensitive security/safety information** – they are attached only for the Police's information at this time.

I also attach Appendix 2 being the Contents Pages of the GSC to illustrate the safety/security (and other) measures that form part of that higher level of regulation which would apply to the East Village on any Stadium Event Day.

Linda – I will be in touch separately early next week about the information to be included in the Agenda Papers/Applicant's bundle – to ensure that the Members will have what they need but equally to ensure that sensitive information (for the protection of all involved with the Stadium's operations) is not inadvertently released into the public domain.

With best regards
Sue

The East Village, External Concourse: Response to Representation submitted by Brent Borough Licensing NW BCU of 5 September 2022

Introduction

This Response has been submitted by the Applicant, Wembley National Stadium Limited (WNSL), to:

1. Put the application for the East Village Premises Licence into context;
2. Address the Representation lodged by Brent Borough Licensing NW BCU; and
3. Provide additional bespoke Licence Conditions.

A 'Scott Schedule' has been prepared (attached) which directly responds to the observations and comments provided by Brent Borough Licensing NW BCU (hereby referred to as 'Brent BCU') in their representation to the 'East Village' premises licence application (FOO10/10) on Monday 5th September 2022.

This document forms an introduction to the Scott Schedule which will be supplemented at the Licensing Committee Hearing (if necessary) by witness evidence from the Stadium Safety Officer (Mr Stuart Doyle) for WNSL, and other key individuals involved in the planned operation of the East Village. Any documents referenced in the Scott Schedule that are not appended as part of this response, were previously submitted as part of the application, and can be provided by WNSL on request.

1. East Village Premises Licence Context

Stadium Event Operations

Wembley Stadium is world-renowned for its operational excellence and the 'new' stadium has been operating since 2007 to a very high standard and (save for the 'perfect storm' of 'unique' circumstances that happened at the Euro 2020 Final – an exceptional event of 'national significance') has demonstrated time and time again that its operations are highly professional and robust. Its operational standards have been held out as the benchmark for Stadiums across the World to emulate.

To ensure the safety of spectators, staff and third parties involved in any Stadium Event (i.e. any event in the Bowl involving more than 10,000 spectators/audience), and irrespective of any licensable activity taking place, WNSL must comply with its General Safety Certificate ('GSC') for sporting events and its Special Safety Certificate ('SSC') for non-sport or concert events. The GSC and SSC are all-encompassing and have been developed (in accordance with Green Guide best practice) using input from a wide range of experts including

The East Village, External Concourse: Response to Representation submitted by Brent Borough Licensing NW BCU of 5 September 2022

WNSL; Brent Council, the Metropolitan Police; and the Emergency Services. Under the broad terms of the GSC, there are additional layers of regulation including the detailed Premises Licence relating specifically to licensable activities and measures to promote the Licensing Objectives.

It is pertinent to note that the East Village is covered by the GSC and SSC on Stadium Event Days. As such, it is crucial that matters which relate to the general safety (in all its guises) of spectators, staff; third parties and all concerned with the Stadium Event, are not duplicated or complicated by the terms of any Premises Licence for the East Village. The Index to the current GSC is provided in Appendix 2 for reference.

It is important to set out that the external concourse (which includes the East Village application area) is an active, public space on Stadium Event Days and it has been safely used (without serious incident relating to safety) by spectators over the last 15 years. The East Village space has been used for various concessions (not involving licensable activities) and activations to date which although not contained, the operations have been controlled and managed as part of the external stadium crowd safety operations. The external concourse is subject to a safety de-brief after every Stadium Event, where any safety measures identified are factored into the event planning for the next occasion.

In addition, the external concourse is well-controlled with stewarding and CCTV etc. on Stadium Event Days, and WNSL (through the GSC procedures (including Event Planning/Risk Assessments etc) are required to meet the measures identified, as appropriate, to fit with the particular risk level of the event. The East Village sits within these operations, and will be a defined, licenced area (demarcated with fencing/structures) where additional measures (as appropriate) can be identified and implemented as part of the GSC/SSC scope, to this defined area, and to which the Premises Licence Conditions also apply. Draft Licence Conditions have been submitted alongside the application (please see Appendix 3).

Baroness Casey Review and Zone Ex Considerations

Following the UEFA Euro 2020 Final and the publication of the Baroness Casey Review in December 2021¹, WNSL, together with its various stakeholders (including Wembley Safety Advisory Group (SAG) and the Metropolitan Police Public Order Planning ('MO6') branch) have worked hard to develop the Best in Class

¹ The Baroness Casey Review – An Independent Review of Events surrounding the UEFA Euro 2020 Final 'Euro Sunday' at Wembley, December 2021

The East Village, External Concourse: Response to Representation submitted by Brent Borough Licensing NW BCU of 5 September 2022

offer in Zone Ex to respond to the recommendations raised in the Baroness Casey Review and improve spectator behaviours on the Wembley Park footprint.

One of the key findings of the Baroness Casey Review was that: *“The absence of a fan zone or fan zones denied the police and other agencies a key crowd management tool and was potentially a very significant factor”* and the following core recommendation was made: *“The establishment of a sterile area within Zone Ex which is restricted to ticketholders”*.

Fan Zones are recognised as a fundamental part of the safety and security of the Stadium. As per the Baroness Casey Review, without sufficient fan zones (which are properly managed; staffed and with appropriate facilities), there is a higher risk of crowds congregating in the less controlled environment of the public domain.

There are two Fan Zones which operate in the Wembley Park Estate currently, however due to imminent redevelopment on the Estate, one Fan Zone space (Event Pad) is no longer feasible; and the other Fan Zone (Arena Square) is increasingly unavailable to WNSL (due to event clashes and new ownership of other legal entities). It was therefore recognised by Brent Council; WNSL and other stakeholders (including certain divisions of the Met Police) that it is imperative that WNSL can provide an appropriate fan zone(s) going forward.

It is WNSL’s view that the East Village is an appropriate licenced Fan Zone space as it is both under the stadium GSC remit and it responds to Zone Ex pressures for additional on-licence capacity and Fan Zone requirements on Stadium Event Days. The area identified and proposals submitted have been supported by expert evidence from Movement Strategies, as crowd modelling experts (Appendix 5), and supportive statements from representatives of the Wembley SAG are also expected.

2. Addressing Brent BCU’s Representation

In the attached ‘Scott Schedule’ WNSL has endeavoured to best summarise and respond to the various observations made in the Brent BCU Representation. This schedule has been designed to respond to each observation in a clear, cohesive and non-repetitive, manner.

The East Village, External Concourse: Response to Representation submitted by Brent Borough Licensing NW BCU of 5 September 2022

As will be clear from the responses provided, WNSL considers that many of the observations raised relate to 'business as usual' operational aspects within the wider remit of its GSC (or SSC) which will cover the East Village on Stadium Event Days. The observations set out, generally do not relate to the proposed licensable activities applied for, but rather the proposed demarcation of the area for use on an event day (and more specifically for segregated events). As per section 1 of this document, the Index to the current GSC is provided in Appendix 2 from which it can be seen that every aspect of planning; operations on the day and de-briefing is covered.

In simple terms, WNSL considers that the proposed East Village Fan Zone is both in accordance with Green Guide best practice, as required by policy, and is a significant Zone Ex requirement in response to the recommendations of Baroness Casey, where in light of imminent development pressures on the Wembley Park Estate, there is no longer and alternative or available option to ensure two separate and segregated Fan Zones can be provided.

3. Revised Proposed Draft Conditions

To date, no observations have been made from any Responsible Authority (including the Police) regarding the draft Licence Conditions submitted in support of the Premises Licence application for the East Village (Appendix 3). As such, it is WNSL's view that the draft Licence Conditions are considered acceptable.

However, in consideration of the objection submitted by Brent BCU, WNSL would be willing to expand the draft conditions for Brent BCU consideration. Please find the proposed amendments/additions in Appendix 5.

Conclusions

In view of the additional context and information provided in this response, and the proposed expanded draft Licence Conditions (shown in blue font, in Appendix 3) it is hoped that Brent BCU is, on reflection, now content to withdraw its objections (on the basis of the expanded Conditions being adopted), and that the Hearing on 23 September will be rendered unnecessary.

Brent BCU is kindly requested to confirm its position as soon as possible. In the event that it wishes to respond to the Scott Schedule and/or raise any remaining, unresolved areas of concern, we would be

**The East Village, External Concourse: Response to Representation submitted by
Brent Borough Licensing NW BCU of 5 September 2022**

grateful if you would again revert without delay. WNSL will then reflect further on any further observations provided.

Sue Dowling, Partner, Blandy & Blandy LLP, for and on behalf of WNSL, September 2022

The East Village, External Concourse: Response to Representation submitted by Brent Borough Licensing NW BCU of 5 September 2022

Brent BCU comment	Page	WNSL's Response	Additional Information/Reference	BCU Response
<p>1. Position of Village. Risk of fans clashing in car parks below; risk of items thrown from EV on to coaches; behaviour of fans</p>	2	<ul style="list-style-type: none"> There is no evidence of fans behaving in the manner described the Police in the first paragraph/page 2 to date. Without prejudice to the above, any risk would be reduced if the East Village (with high fencing; concessions being located along outer concourse/boundary, and with Back of House service lane access only, and designated staffing) was in place. For the avoidance of doubt, the East Village Fan Zone will be for the East team. All issues relating to the segregation of fans/measures pertinent to the level of risk etc fall within the remit of the GSC (or SSC). The GSG/SSC includes the External Concourse (and hence The East Village). The East Village consequently would replace what is currently a freely accessible public spectator point into an area which will not be accessible to those within the fan zone. Fan behaviour – WNSL dispute the comment that there is nothing in place to prevent unauthorised entry into the East Village. Specifics have already been provided including in the Security Management Plan. The Police's comments concerning possible fan behaviour vis a vis the East Village fan zone fails to acknowledge the actual behaviour of fans in the two existing fan zones. With respect, the available evidence in relation to the latter does not support the Police's comments. In terms of promoting the Licensing Objectives and specifically regarding the sale of alcohol, the design of the East Village moves fans from the edge of the Concourse (see above) and there is a greater opportunity to monitor levels of alcohol consumption in an enclosed, controlled area (than in the open public realm areas). 	<ul style="list-style-type: none"> See information already provided on 2 September in Response to Police Comments at Appendix 1. See Contents Pages of GSG (Appendix 2) and specifically Section 6 (Segregation Measures) and Section 7 (spectator Management). See draft Licence conditions for East Village (Appendix 3) Security Management Plan provided to the Police on Friday 1 September (Appendix 4) 	
<p>2. Large concentration of one set of fans outside Stadium may attract trouble from opposing fans.</p>	2	<ul style="list-style-type: none"> WNSL considers the proposed solution significantly improves the current arrangements; The current two Fan Zones are both on the Boulevard i.e. they are both to the west of the Stadium. Currently one fan group has to walk past the other and to date, while this arrangement has been in place there 	<ul style="list-style-type: none"> Evidence can be provided by the Safety Officer and/or Tom Legg of WNSL to elaborate on the points made. 	

		<p>has been no large-scale disorder.</p> <ul style="list-style-type: none"> • A Fan Zone on the east side would help further segregate fans. • In any event, depending on where the team fans arrive from, they mix all the way from Kings Cross/Euston/Baker Street/Olympic Way/Stadium Footprint anyway. • WNSL does not consider that there is any credible evidence to suggest that the concern raised under point (2) is an appreciable risk; without prejudice to this view, the East Village would reduce any risk. 		
<p>3. Complications may arise due to Crystals' operation/ Segregation of fans.</p>	<p>2</p>	<ul style="list-style-type: none"> • This observation from Brent BCU is essentially a repeat of the points already expressed under points 1. & 2 and addressed above. • Further, Wembley Park station supports c.75% of all fan ingress / egress compared to the car/coach parks. Fans are not segregated at any stage until they enter the Stadium Bowl. • The car parks remain segregated, and all west team spectator movement would be routed to the south of the stadium on South Way, away from the Fan Zone. • WNSL is regularly in contact with Crystals but the latter's operation is independent of WNSL. • The designation of Crystals is not a matter that is within WNSL's gift – it is the Police Licensing Team and Brent Council which ultimately decide. • WNSL's recommendation is that Crystals continues to be designated as a West Team facility in view of its proximity to Pink Parking. 	<ul style="list-style-type: none"> • See Appendices specified above. 	
<p>4. The Village takes up space from fans being able to walk freely.</p>	<p>2</p>	<ul style="list-style-type: none"> • WNSL's view is that this statement is not entirely accurate; • Currently the area that will be the East Village is not necessarily a free walkway; at times there are (non-licensable) activations there for example a food court with bench tables and sometimes concessions. E.g. Harry Styles merchandise operation (see some information relating to the latter at Appendix 6). • It is inaccurate for the Police to say that the area is "not controlled" and always a free walkway – the area is always controlled (through CCTV and stewarding) and on occasions it is actively managed in terms of (for example) queue management (e.g. at the Harry Styles event). • In any event, this does not appear to be an issue that is relevant to the promotion of the Licensing Objectives. • There is expert evidence available (in the form of the Report from 	<ul style="list-style-type: none"> • Movement Strategies Report (Appendix 5) • GSC including sections 4-7; and 10-11 • SSC information and other relevant documents as an example of current usage of East Village footprint (Appendix 6). 	

The East Village, External Concourse: Response to Representation submitted by Brent Borough Licensing NW BCU of 5 September 2022

		<p>Movement Strategies) which has already been disclosed to the Responsible Authorities (including Brent BCU) to confirm that the area identified for East Village is appropriate, in terms of crowd management/flow.</p> <ul style="list-style-type: none"> All manners relating to crowd management fall within the GSC/SSC for a Stadium Event Day in any event. 	
5. There are 5 lanes into the Village but only 3 out and query queuing difficulties	2	<ul style="list-style-type: none"> WNSL is well practised in queue management and currently employs a range of strategies to manage fans (and where appropriate to divert them to other concourse entry points). These currently practices will also apply to the East Village on a Stadium Event Day as this falls within the Event planning and Operations under the GSC. There is in any event more exit space to be utilised at the required time via the blow out gates in addition to the three exit lanes. Further, all entry lanes will be reversed 1 hour prior to KO to allow for maximum exit flow as per the Security Management Plan submitted. The two final exit gates from the area (for emergencies) can also be used to disembark fans from the Village, in a more evenly spread exit distribution. 	<ul style="list-style-type: none"> Crowd Management falls within the GSC. The Stadium is well versed in crowd management – specifically around queue management at entrance points. This is regularly demonstrated at Events and practices are tailored following any feedback from Events. Reference should be made to the Security Management Plan already provided.
6. Village closing 30 minutes pre-Kick Off insufficient?	3	<ul style="list-style-type: none"> See responses to point (5) which are equally applicable to this concern. The East Village bars would close at least 1 hour before planned Kick off. From that time spectators will in practice start to 'drink up and move into the Stadium. WNSL consider that through their experiences and expertise in crowd movement and the evidence available supports its submission that that the Village being closed at least 30 minutes before kick-off will be sufficient to move the spectators through security/turnstiles to enter the Stadium ready for the match/concert. 	<ul style="list-style-type: none"> The Safety Officer can elaborate on the matters set out in the Response. See comments/documents referred to in 1-5 above.
7. Capacity and query if sufficient toilets for 4000 max capacity, and clarification over number of SIA staff at Village required	3	<ul style="list-style-type: none"> The maximum capacity for the planned East Village is 4000. This figure has been derived applying principles under the Green Guide and in addition WNSL's Method of Management (see example included in Appendix 6) In practice the capacity on any Stadium Event Day may be reduced from this maximum figure depending on a host of factors applicable through the GSC/SSC. For example the capacity may be reduced (through Wembley Management/GSC) depending on the nature of the Event; the 	<ul style="list-style-type: none"> The Green Guide The Stadium's GSC The Security Management Plan (2 September 2022) Revised Conditions at Appendix 3 (limiting capacity)

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<p>8. Requires reassurance that East Village will be operated in terms of security as per the Stadium – questions re fencing.</p>	<p>3</p>	<p>risk level attributed to the Event in the Bowl; the concessions and other infrastructure to be placed in the Village etc</p> <ul style="list-style-type: none"> The particular capacity (at any one time) on a particular Event Day will thus be calculated in accordance with Green Guide principles; the GSC/SSC for the Event and using the tried and tested methods of management adopted by the Stadium (for example in relation to pitch capacities) over the years. In addition to the information provided in the Security Management Plan specific to the East Village, it should be noted that the Stadium also has significant resources based on the External Concourses as part of the Stewarding plan under the GSC. This comprises a further 176 staff currently, of which 65 are dedicated security response teams to help support the external concourse operation. A formal response was submitted following the Police meeting on Friday 2nd September illustrating the logic behind the capacity figures and the workings for the spectator capacity as per the Green Guide (Appendix 1). Based on a crowd of 4,000 spectators and a 4 hour operation with alcohol served, a total of 25 toilets are required. As per the Security Management Plan, WNSL proposes to provide 36 x toilets in the East Village. In the spirit of compromise, WNSL is prepared to offer a revised condition relating to the capacity of the first three events (on Stadium Event Days) – see Revised Conditions at Appendix 3 	<p>at first three matches).</p> <ul style="list-style-type: none"> WNSL example Method of Management for recent Concert event. Appendices 1-6 	
<p>8. Requires reassurance that East Village will be operated in terms of security as per the Stadium – questions re fencing.</p>	<p>3</p>	<ul style="list-style-type: none"> WNSL has considerable experience of using different forms of screening/fencing/barriers – the forms varying depending on a number of considerations. WNSL following research considered that it had identified the best fencing product available to mitigate the issues identified by the Police – that said WNSL confirmed it is open to considering alternatives to be proposed by the Police. As at today, WNSL awaits further information from the Police of the options they consider preferable. In terms of security measures, WNSL will mirror (where appropriate) those applicable to existing licensed fan zones. All those in the East Village (in the same way as any spectator outside of the Village) will have to undergo the usual security checks on entry to the Stadium. In addition, reference should be made to the specific conditions which 	<ul style="list-style-type: none"> Information already provided to the Responsible Authorities relating to the proposed fencing. Draft Licence Conditions. 	

The East Village, External Concourse: Response to Representation submitted by Brent Borough Licensing NW BCU of 5 September 2022

		have been lodged to support this Licence Application		
9. Concerns re fraudulent tickets/entry measures	3	<ul style="list-style-type: none"> Monitoring capacity and all security measures are set out in the Security Management Plan; the wider GSC, and draft Licence Conditions. Ticket check and soft bag search are proposed as per existing Fan Zone arrangements. The East Village benefits from further stadium security measures including dog search units on the external concourse to further mitigate against ASB. Those subject to football banning orders are on the Police's national database. WNSL would welcome a discussion with the Police regarding any system of which they are aware which would enable the Stadium to trial technology to conduct facial recognition (using their database) linked to the Stadium's CCTV (which will apply to the East Village too) to capture all those on football banning orders across the UK. 	<ul style="list-style-type: none"> Information already provided to the Responsible Authorities relating to Security Management Plan. Draft Licence Conditions. The Stadium's GSC. 	
10. Concerns re Policed/Ambulance attending to situation within Village	3	<ul style="list-style-type: none"> The medical provision to the Stadium (including what will be the East Village) is private and is in-house employed and staffed with HCP from all levels. The External Concourse also has a dedicated medical response team and a large medical unit that provides capability for trauma. Ambulances for public are parked on site and transfer to the medical facility for assessment and then to hospital as already catered for. This is the current operation of the Medical Plan approved via issue under the GSC. There are very few instances when the LAS are called to the stadium and WNSL does not consider the use of East Village as a fan zone will result in any increased risk of this. If anything, those in the fan zones will be in a more controlled environment and staff will be more readily on hand to assist that fans roaming around in the public realm. 	<ul style="list-style-type: none"> The Safety Officer can provide further specifics GSC – See Appendix 2 – specifically Schedule 6 	
11. Concerns re noise nuisance – has this been considered by WNSL?	4	<ul style="list-style-type: none"> A Noise Management Plan (prepared by expert Acoustic Consultants) was submitted which sets out the mitigations against this. WNSL does not consider that the licensable activities in the East Village (when taken in context with the wider External Concourse and Wembley Estate usage on an Event Day) will lead to any increased risk of negative impact on local residents or businesses. Indeed the opposite is arguably more probable with a section of the spectators being removed from the public realm areas into a controlled environment. 	<ul style="list-style-type: none"> Vanguardia Ltd NMP of 2 September 2022 	

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<p>12. Exhibit JC1 Comments made Design Out Crime Office (PC Johnston)</p>	<ul style="list-style-type: none"> • In view of the lack of any objections from the Noise Control Team at LBB, which suggests that the experts in the area of noise are content with the application as drafted. 	<ul style="list-style-type: none"> • Most of the comments made in JC1 are linked to the matters raised by Brent BCU and are answered above, or in the documentation that has been provided already (e.g. in the Security Management Plan). • WNSL responds however as follows (in relation to matters not covered above or in the supplemental documentation provided): • WNSL does not seek or request additional police support for the East Village operations. Any support that is required would be part and parcel of the usual Police arrangements with WNSL and would be funded under the SPS Agreement. • Information has already been provided about the 'fence in a bag' proposed usage and the Police have seen details of this (in person on a site inspection; through photographs and during the consultation process). • For the avoidance of any doubt, WNSL will commit to installing a suitable high crowd loaded fence (of not less than 1.8m in height) to delineate the East Village on days that it is in use as a fan zone for football (GSC) fixtures. WNSL will review any product recommendations that DOCO brings to their attention. • In relation to the second half of page 2 of the DOCO's comments, in many respects WNSL agrees with the observations made and is confident that through its robust operations under the GSC/SSC, the East Village will be operated to the same high standard as the operations within the Stadium. 	<ul style="list-style-type: none"> •
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London Borough of Brent

Safety of Sports Grounds Act 1975 (as amended)

General Safety Certificate

for the

Designated Sports Ground

known as

Wembley National Stadium

**Wembley
Middlesex
HA9 0WS**



Amendments to General Safety Certificate

Date	Certificate Version	Amendment Details
27 Mar 2007	v1	General Safety Certificate
11 Feb 2011	v2	Revised General Safety Certificate
22 Nov 2019	v3	Revised General Safety Certificate
25 June 2020	v4	Revised GSC - 'no spectators' (games behind closed doors) COVID-19 pandemic restrictions
14 April 2021	v5	Revised GSC – 'scientific Events Research Programme pilot schemes' COVID-19 pandemic restrictions
05 Aug 2021	v6	Revised GSC – Step 4 – easing of COVID-19 restrictions
16 Feb 2022	v7	Revised GSC – End of Plan B and removal of COVID-19 restrictions and NHS Covid status checks

General Safety Certificate Wembley National Stadium Ltd

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The East Village – Security Management Plan* with Safety and Security Deployment Plan



FOO10/10 – East Village Premises Licence Application – FA Response to Police Comments

Introduction

Wembley National Stadium Ltd (WNSL) submitted a premise licence application to Brent Council on 8th August 2022 for:

"A proposed licence premises 'East Village' comprising an open-air area, defined section of the external concourse at Wembley National Stadium, which will be used for a variety of purposes both on Stadium Event Days and from time-to-time on Non-Stadium Event Days. Regulated entertainment will be provided on many occasions along with the provision of food and beverages (including alcohol). The capacity of the East Village is limited at any one time, to a maximum of 4,000 spectators."

Responsible stakeholders have been invited by Brent Council to make comments or representations in response to the licence application by Monday 5th September 2022. Informal comments have been received from the North West Brent Police Licencing Team for comment and resolution by WNSL ahead of the application determination.

A meeting was held between representatives at WNSL, the Police and Blandy & Blandy at 14:00 on Friday 2nd September to resolve any outstanding comments or queries surrounding the application. The following five comments were raised:

1. *Confirmation required that Pink Parking and Crystals would be dedicated to the 'East' team for segregated sporting events*
2. *Additional clarity required on crowd density calculations and whether the maximum 4,000 spectator capacity is too high*
3. *Provision of the land areas and capacities of the existing Fan Zones at Arena Square*
4. *Consideration of consultation with London Fire Brigade*
5. *Review security of the fencing product proposed in response to instances of crime*

This technical note looks to provide clarity and additional commentary surrounding the application comments ahead of the determination on Monday 5th September 2022.

In any instance, it is WNSL's view that the concerns raised can be mitigated and any outstanding issues can be resolved in cooperation with the Police during the upcoming 3x events at Wembley Stadium. This provides an appropriate opportunity to trial and test the Fan Zone operation on the external concourse ahead of the 2023 calendar season.

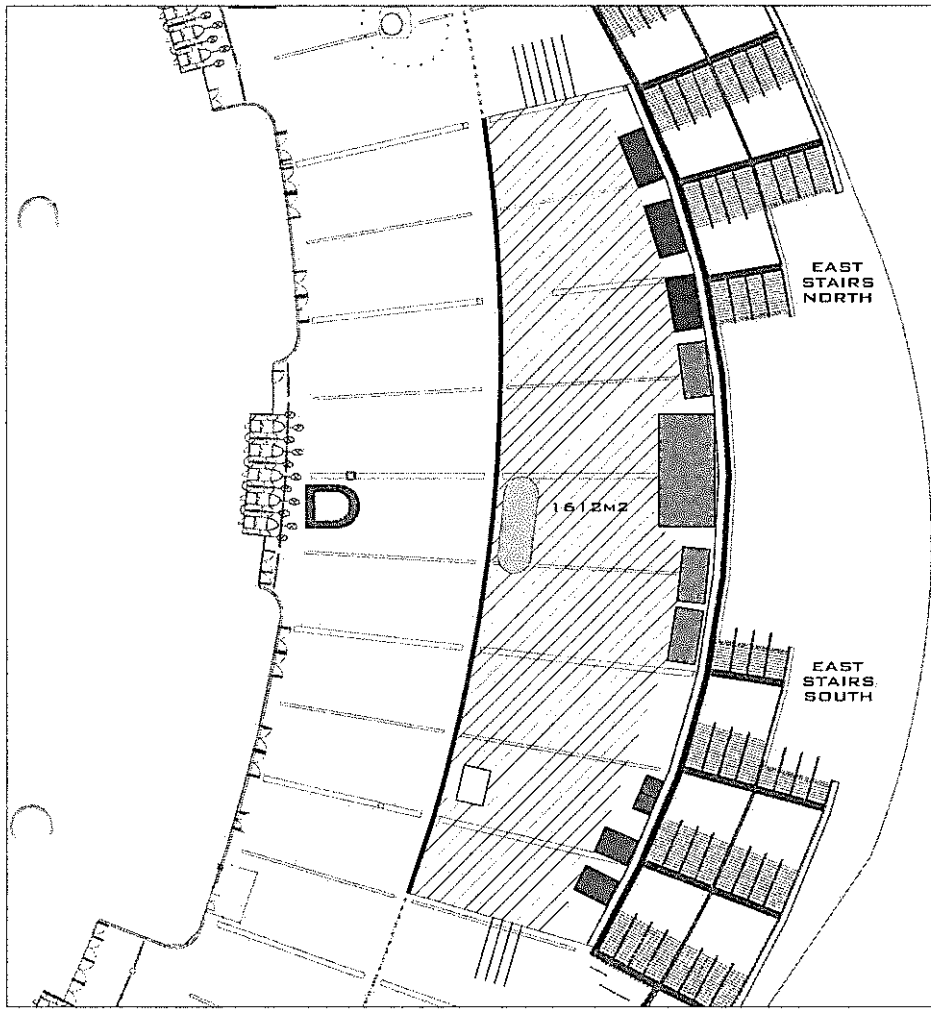
Please see the responses summarised in **Table 1** overleaf.

Table 1: Police/WNSL Fan Zone Premises Licence Comments/Responses


No.	Police Comment	WNSL Response
1.	<i>Confirmation required that Pink Parking and Crystals would be dedicated to the 'East' team for segregated sporting events</i>	<p>It was confirmed in the meeting that Pink Parking is a designated space for the 'west' team. Green Parking is the 'east' parking allocation and would work with the Fan Zone as spectators can route via the North East stairs. Pink Parking is the 'west' parking allocation and spectators are routed along South Way to the south of the stadium, for stadium entry via Gate 3.</p> <p>The designation of Crystals is recommended as a 'west' team on-licence facility by WNSL based on the proximity to Pink Parking but is ultimately to be decided by Brent Council and the Police Licencing Team.</p>
2.	<i>Additional clarity required on crowd density calculations and whether the maximum 4,000 spectator capacity is too high</i>	<p>The crowd density calculations have been worked out in accordance with the Green Guide Best Practice. Based on the circulatory area of the Fan Zone (excluding the merchandise / concession units and back-of-house service lane) there is sufficient space for a maximum of 4,209 spectators. The licence application applies for less than this at a total of 4,000 spectators on any one event day. Please see the drawing in Appendix A which illustrates the general circulation space available and calculation of space requirements.</p>
3.	<i>Provision of the land areas and capacities of the existing Fan Zones at Arena Square</i>	<p>Arena Square is 3,060sqm in size and occupies 2,5000 spectators on an event day.</p> <p>Event Pad is 1,895sqm in size and occupies up to 1,750 spectators on an event day.</p>
4.	<i>Consideration of consultation with London Fire Brigade</i>	<p>London Fire Brigade has been provided notice of the application as a responsible stakeholder. WNSL has received no holding objection or comments in response to the premise licence application.</p>
5.	<i>Review security of the fencing product proposed in response to instances of crime</i>	<p>It was raised in the meeting that the Design Out Crime Officer (DOCO) has put together a report which includes suggested fencing material for the Fan Zone to eliminate crime via the fencing material, with alcohol being passed through any 'gaps/holes' in the fence.</p> <p>It would be the intention of WNSL that this report is supplied ahead of the application determination date and it is put forward as a recommendation of the premise licence application, which WNSL can develop with the Police to ensure the selected fencing solution sufficiently meets the Police's requirements.</p>

2,500

Appendix A – East Village Crowd Density Plan



NOTES

 = 1612M2

1612 / 0.3 = 5373
 1612 / 0.4 = 4030
 1612 / 0.5 = 3224

5375 + 4030 + 3224 = 12,627

12,627 / 3 = 4209 PEOPLE

**EASTERN CONCOURSE
 UNION BAR LAYOUT
 CAPACITY CALC**

02/09/22



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Excluded Document

Movement Strategies – Crowd Modelling Report

Excluded Documents

Additional Documentation relating to Harry Styles Concert (by way of example) – Part documents only*