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Health Supplies Limited
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3 September 2024

Ref: 32526

Dear Sir/Madam,

Licensing representation against the premises licence application in respect of Proposition Studios, 416 Ealing Road, Wembley, HA0 1JQ.

The above-mentioned application has been made pursuant to section 17 of the Licensing Act 2003.

I confirm that I am the delegated officer of the Licensing Authority, in whose area the above-mentioned premises is situated, and who is authorised for the purposes of exercising its statutory function as a 'Responsible Authority' under the Licensing Act 2003.

I have carefully considered the above premises licence application, and consequently, I wish to make a representation on the grounds that if the application were to be granted as submitted, it would likely have a detrimental effect on two out of the four below licensing objectives:

- the prevention of crime and disorder;
- **public safety;**
- **the prevention of public nuisance;**
- the protection of children from harm.

Operating Schedule

The original premises licence application sought the following permitted licensable activities and opening hours:

Live music: Monday to Thursday, 19:00 – 00:00, Friday to Sunday 19:00 – 03:00

Performances of dance: Monday to Thursday, 19:00 – 00:00, Friday to Sunday 19:00 – 03:00

Late night refreshment: Monday to Thursday, 23:00 – 00:00, Friday to Sunday 23:00 – 03:00

Opening hours: Monday to Thursday, 18:00 – 00:00, Friday to Sunday 18:00 – 03:00

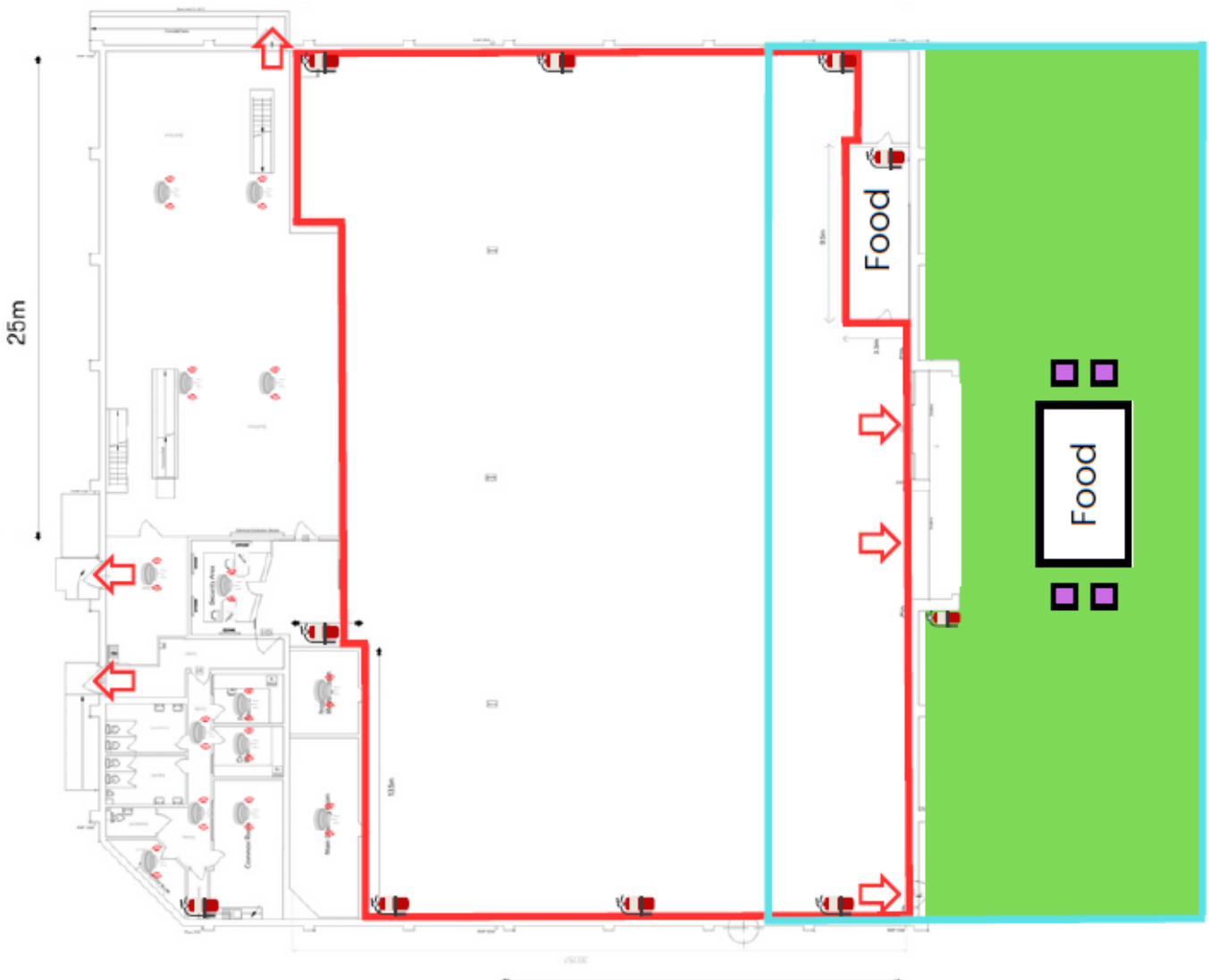
The Licensing Authority notes that the premises licence application had not been made in line with other existing premises licences within the local area.

Furthermore, the initial premises licence application didn't make it clear if it was time limited or if it was to be granted in perpetuity.

Location

The premises is located on the corner of Alperton Lane and Ealing Road. The building itself is a vacant commercial unit, situated at the entrance of an industrial estate and runs parallel to Burns Road, a residential street consisting of terrace housing.

The nearest noise-sensitive properties are therefore on Burns Road, which consists of approximately 14 homes with the rear of these houses facing the proposed premises licence area. There are roughly 21 meters between the north side of the building and the rear of these homes.





As per the original premises plan, the red area denoted that live music and the provision of dance will be undertaken inside the premises, with the blue area showing that the provision of late-night refreshment will take place outside in the car park.

Informative

The Licensing Authority felt that, given the nature of the initial application and the terminal hour of 03:00 for the proposed licensable activities, the conditions put forward within the operating schedule fell short of what would be expected from an applicant in respect of promoting the four licensing objectives. Furthermore, some of the original conditions provided lacked sufficient detail.

As such, I contacted the applicant on 29 August 2024 and requested further information to answer the below questions:

1. What is the maximum number of expected daily attendees for this event?
2. What is the expected number of employees (including volunteers) working at this event on any given day?
3. How will entry to the event work? Will it be ticketed? Will there be a fee? Is it free upon point of entry? How will the premises ensure that the total number of attendees not exceed the expected total capacity?
4. How will the SIA security go about their duties? (I.e., How many will be at the event in total? How many will be at the entrance?)
5. Will patrons be able to re-enter the premises?
6. Where will the queue be located?
7. How many "qualified medical personnel" will be at the premises, and what will their specific qualifications be? How many first aid stations will be there?
8. How will the premises negate against causing noise related complaints from the live music and the use of the outside area? (Especially as it's stipulated to end at 03:00 on certain days)
9. Have you completed the sound management plan yet?

10. Will there be an age limit for attendees?
11. How will egress of the event be managed?

The applicant, Mr Chachapura (director of the limited company applying for the premises licence) responded on Friday 30 August 2024. It was subsequently confirmed by Mr Chachapura that the operating schedule had been reduced to the following:

Live music: Sunday to Thursday, 19:00 – 23:00, Friday & Saturday, 19:00 – 00:30

Performances of dance: Sunday to Thursday, 19:00 – 23:00, Friday & Saturday, 19:00 – 00:30

Late night refreshment: Friday & Saturday, 23:00 – 00:30

Opening hours: Sunday to Thursday, 19:00 – 23:00, Friday & Saturday 19:00 – 00:30

Further key points were also clarified such as:

- Confirmation that the premises licence would be time limited for the period between Wednesday 2 October 2024 to Saturday 12 October 2024.
- All licensable activities undertaken shall take place entirely within the internal area of the premises, and that there will be no provision of late-night refreshment within any external outside area.
- Confirmation of the total number of attendees (1,500), and that a ticketing system would be used.
- The total number of SIA staff employed for each day of the event.
- Further details provided on how the premises will mitigate against noise nuisance complaints.
- Further details provided regarding public safety for all attendees at the event.

Summary

Having carefully reviewed the premises licence application and the subsequent response, I would appreciate it if the applicant could confirm whether they are satisfied with the conditions set out at the rear of this representation.

The applicant is, of course, free to accept, amend or reject these annex two conditions. I would advise the applicant to read the conditions carefully and ensure they align with the business model. It's important to strike the right balance between promoting the four licensing objectives and having conditions in place that are capable of being met. These conditions have been based on the response to my request for further information, the original premises licence application, and additional measures that the Licensing authority believes would promote the four licensing objectives.

It should be noted that if the applicant rejects the proposed conditions and no mediation can be reached, I will most likely uphold my representation against the premises licence.

Yours sincerely,



Edwin Maldoom
Licensing Enforcement Officer

Proposed Annex Two Licence Conditions
Proposition Studios, 416 Ealing Road, Wembley, HA0 1JQ
(Time limited premises licence – Wednesday 2 October 2024 to Saturday 12 October 2024)

General

1. Notices shall be displayed at the entrance stipulating the operating hours of the premises.
2. The maximum number of attendees (excluding authorised staff members) present for each day of the event shall not exceed 1500 persons.
3. There shall be no ticket sales made at the premises. All tickets must be obtained through an authorised online ticket provider prior to the event. The number of tickets allocated to the online ticket provider must not exceed 1500 for each day of the event.
4. No entry shall be permitted to attendees unless a valid ticket is produced upon entry to the premises.
5. Staff members shall verify the tickets upon entry to the premises to ensure that only persons with valid tickets can enter the premises.
6. Trained event staff and SIA Security shall monitor the real-time number of attendees entering the premises, real-time number of attendees inside the premises and the real-time number of attendees leaving the premises.

The Prevention of Crime and Disorder

7. There shall be at least 20 SIA staff on-site each day throughout the event.
8. All SIA staff shall wear clothing that is clearly identifiable.
9. All SIA staff shall be equipped with radios and communication devices.
10. A log shall be kept of the SIA staff working on any day to include their full name, date of birth, SIA licence number, company and booking on-off times. A copy of SIA staff log shall be available upon request by Police and authorised officers from Brent Council.
11. Signage shall be displayed at all entrances indicating searches might take place. Ticket conditions and website information shall indicate that searching might be undertaken.
12. SIA staff positioned at the entrance of the premises shall:
 - a) Conduct searches, bag checks and screening for prohibited items for all attendees entering the premises.
 - b) Manage the queue along Alperton Road to ensure that it's safe for all attendees and that noise is kept to a minimum.
13. The remaining SIA staff shall be patrolling the premises licence area to monitor the crowd inside the premises and undertake:

- a) Regular patrols throughout the premises to monitor the crowd.
 - b) Being prepared to respond quickly to any emergencies or incidents, including medical emergencies or disturbances.
 - c) Managing access to restricted areas and ensuring that only authorised personnel are allowed in specific zones.
 - d) Ensuring that all event safety protocols are followed and assisting with crowd management to prevent overcrowding and maintain order.
14. An incident log shall be kept and maintained at the premises which will include a log of the following, including any additional pertinent details:
- a) Any incidents of disorder, violence, or antisocial behaviour.
 - b) All crimes reported to the venue, or by the venue to the police.
 - c) All ejections of patrons
 - d) Any complaints received.
 - d) Seizures of any drugs, prohibited items or any offensive weapons.
 - e) Any faults in the CCTV system
 - f) Any visits by a responsible authority (under the Licensing Act 2003) or emergency service.
15. Records shall be completed within an hour of any incident, and shall contain the time and date, the nature of the incident, the people involved, the action taken and details of the person responsible for the management of the premises at the time of the incident.
16. The incident log shall be kept for at least 12 weeks after the premises licence has lapsed and shall be made available for inspection upon request by an authorised officer from Brent Council or the Police.
17. The premises shall install, operate, and maintain a digital colour CCTV system. The CCTV system shall continually record whilst the premises are open for licensable activities and all recordings shall be kept for 31 days.
18. A member of staff who is conversant with the operation of the CCTV system shall always be available at the premises whilst it's open to the public. CCTV footage shall be provided on removable media (i.e., USB, hard drive, CD etc..) upon request by an authorised officer from Brent Council or the Police.
19. The CCTV system shall be capable of obtaining clear facial recognition images of every person entering or leaving the premises with further CCTV cameras covering the areas stipulated on the premises plan. The CCTV system shall also display on any recordings, the correct date and time of the recording.
20. The CCTV system shall capture the entirety of any external area in which patrons' queue along Alperton Road
21. Signage stating that CCTV is in operation shall be clearly and prominently displayed at the premises.
22. There shall be no admittance to the premises after 21:00 on Sunday to Thursday.
23. There shall be no admittance to the premises after 22:00 on Friday and Saturday.

24. There shall be no re-admittance to the premises by any attendee once they have left the venue. There shall be notices clearly displayed at the exits informing attendees of this policy.
25. Any drinks sold shall be provided in polycarbonate, aluminium can or similar non glass drinking vessels.

Public Safety

26. There shall be at least one designated medical area within the premises. The medical area shall be clearly signed posted and the location shall be made obvious to all attendees.
27. There shall be at least one paramedic and further additional first aid trained personal on site whilst the premises are open for licensable activities.
28. All medical personnel shall have up-to-date certifications in emergency response and shall have up to date medical supplies.
29. The premises licence holder shall ensure that a written Medical Response Plan (MRP) is implemented and adhered to.
30. The premises licence holder shall ensure that a written Evacuation Plan (EP) is implemented and adhered to.
31. The premises licence holder shall ensure that a written Fire Safety Risk Assessment (FSRA) is implemented and adhered to.
32. In the case of an emergency evacuation, stewards and security shall assist the attendees in leaving the premises in a safe manner. The evacuation procedure shall also be announced on the PA system.
33. All staff shall be trained in the emergency evacuation process.
34. The entrance/exit point (including evacuation points) shall be clear, obvious and remain unobstructed to ensure safe ingress and egress for attendees and staff.
35. Upon egress, stewards shall be positioned at all exit points to assist with attendees leaving the premises in a safe manner.

The Prevention of Public Nuisance

36. All licensable activities shall take place inside the premises and shall not take place in any external outside area.
37. A dedicated audio team shall be on-site to manage and monitor sound levels during any regulated entertainment undertaken at the event. This team shall have sole control over the use of the sound limiter installed onto any amplification equipment.
38. The premises shall undertake a Sound Management Plan (SMP). This written plan shall explicitly state the decibel limit set by the premises licence holder. The SMP shall be made available to officers of Brent Council upon request.

39. Noise monitoring shall be undertaken by a member of staff between 21:00 until the closure of the premises.
40. Noise monitoring shall involve walking around the perimeter of the car park as it runs parallel to Burns Road. A further check shall also be made along Burns Road itself. Both noise monitoring checks shall be undertaken every hour.
41. All noise monitoring checks shall be recorded in writing, stating the time of the visit, location, whether noise was audible or was not, description of any noise and any subsequent action taken. The noise monitoring log shall be kept at the premises in hard copy form and shall be produced upon request to any authorised officer of Brent Council.
42. Speakers shall be placed to direct sound away from Burns Road.
43. Amplified music shall not be permitted in any external areas.
44. Ingress and egress notwithstanding, all doors shall remain shut to the premises during any regulated entertainment.
45. The premises licence holder shall make an up-to-date telephone number available to nearby residents. Any complaints noise pertaining to noise shall be recorded and responded to immediately, with adjustments made as necessary.
46. Clear and legible notices shall be prominently displayed at the exit requesting patrons to respect the needs of residents when leaving the premises.
47. On weekends, during the final hour of the event (23:30 to 00:30), sound levels shall be gradually reduced to further decrease any potential noise impact as the event winds down.
48. SIA staff shall be positioned outside the venue to manage attendees exiting in a quiet manner. SIA staff shall ask any attendees to leave the immediate vicinity if they are loitering outside the venue.
49. There shall be no attendees permitted in any outside area of the premises once the event has started.

The Protection of Children from Harm

50. There shall be no alcohol sold or consumed within the premises licence area.