
Accor UK Economy Hotels Limited
Ibis Hotel
South Way
HA9 0AB

2 July 2018

Licensing Representation to the Application to vary the Premises Licence for Ibis Hotel, South Way, HA9 0AB

I certify that I have considered the application shown above and I do not wish to make representations against this application.

Officer: Susana Figueiredo – Licensing Inspector

An officer of the Licensing Authority, 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.

The application has been made to vary the premises licence under section 34 of the Act.

The Licensing Authority representations are primarily concerned with the four licensing objectives;

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

Conditions requested to be removed by the applicant

- Customers shall not be permitted to take open glass containers outside the premises as defined on the plan submitted to and approved by the Licensing Authority.

The Licensing Authority does not agree with the removal of this condition as it will allow and encourage customers to consume alcohol on the public highway. The entire of the Borough of Brent is covered by a Public Space Protection Order (PSPO), whereby drinking alcohol is not permitted on the street. By keeping this condition, it will ensure that all customers are kept within the premises boundary when consuming alcohol.

Licensing Objectives undermined if condition is removed: -

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

- The consumption of alcohol shall be restricted to parts of the premises identified on the plan submitted with the operating schedule and approved by the Licensing Authority, including the residents rooms.

Please can you clarify what you are hoping to achieve by removing this condition?

- On major event days at Wembley Stadium the following shall apply:-
 - o Customers shall not be allowed to congregate outside the premises.
 - o No glass bottles shall be handed over the bar but decanted into toughened glass or plastic vessels.
 - o Toughened glass or plastic shall be used throughout.
 - o The DPS will work with Police and If necessary conform to directions given by the most Senior Police Officer on duty at the event.

Please can you clarify what you are hoping to achieve by removing this condition?

Changes to the plans submitted by the applicant

- To add a terrace to the exterior of the premises
 1. The Local authority does not agree with the proposed external area which has been added as a licensable area. The application is not clear as to where customers will purchase alcohol. There is no bar identified in the outside area which creates the assumption that customers will be using the main entrance to gain access to the internal bar. This means that customers will be entering and leaving the premises which depending on the number of customers attending, not including the residents who are staying at the premises, this may create an unmangeable front of house which aside from other issues such as crowd control, should be kept clear at all times in case of emergencies.
 2. The terrace identified on the plan, appears to block three fire exits including the entrance at the front of the premises and the two exits at the back of the premises. The Local authority opposes this as it will undermine the licensing objectives below.
 3. A smaller terrace at the side or rear of the premises would be more appropriate which would be controlled to only include those firstly entering the hotel as a customer as mentioned in the application.
 4. Please can you confirm whether vehicles would be using the side access at the time an event is held in the external area?

Licensing Objectives undermined if terrace is included as is: -

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

Proposed conditions to be added as requested by applicant

- When the outside area is in use temporary barricades will be used to restrict access to this area by the public other than directly from the Hotel.

As it stands the entire front of the premises has been included as being licensable. It is unsure how members of the public will be identified differently from those persons already in the hotel. Please can you clarify?

- The provision of door security at the Premises will be reviewed and risk assessed on a regular basis with each event day being assessed in consultation with the Police licensing and appropriate levels of door security being employed.
- A copy of the provision of door security risk assessment to be kept on site and to be made available to police officer and licensing officer from the Council on request.

A replacement condition has been suggested below.

Proposed conditions to be added by the Local Authority

- On days when events are held, all external areas shall cease use from 2300 hours with the exception of a maximum of 20 smokers who shall use the outside area at the front of the premises. There shall be no licensable activities including the consumption of alcohol after this time.
- No music to be played in external areas at all times.
- The premises dispersal policy shall be kept and made available to police and authorised officers from Brent Council.
- SIA shall be required at the venue (internally and externally) when open to members of the public and carrying out licensable activities in the external area, the number for which shall be determined dependent on the nature of the function taking place. Any staff carrying out a security role shall be licensed by the SIA Authority. Where necessary, a risk assessment must be carried out prior to a function, in order to determine the number of SIA and shall be made available to Police and authorised Officers from Brent Council upon request. The risk assessment shall be kept for a minimum period of 12 months post function.

When SIA are required the following two conditions will apply:-

- SIA Security shall wear clothing that can be clearly and easily identified on CCTV.
- A register/log containing the names, badge number, dates & times of duty of security staff and any incidents that occur shall be kept and made available to the Police and Licensing Authority.
- Any staff directly involved in selling alcohol for retail to consumers and staff who provide training including managers shall undergo regular training of the Licensing Act 2003 legislation (at least every 12 months). The training shall be documented and signed off by the DPS and the member of staff receiving the training. This training log shall be kept on the premises and made available for inspection by police and relevant authorities upon request.
- An incident log shall be kept at the premises, and made available for inspection on request to an authorised officer of Brent Council 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
- (e) all seizures of drugs or offensive weapons
- (f) any faults in the CCTV system or searching equipment or scanning equipment
- (g) any refusal of the sale of alcohol
- (h) any visit by a relevant authority or emergency service

- When an event takes place at the premises, there must be suitable measures in place in the external terrace area to ensure there is a free flow of access and egress for customers. As such, the area between the exit doors from the premises into the terrace area and from the terrace area out on the public highway shall be free from any obstruction including persons.

Proposed conditions to be replaced as requested by the Local Authority

- 8. Photographic proof of age shall be required from all persons appearing to be under the age of 21.

To be replaced with

- A “Challenge 25” policy shall be adopted and adhered to at all times.

I look forward to hearing from you soon

Yours sincerely



Susana Figueiredo
Licensing Inspector
Planning, Transportation & Licensing