

## Police Concerns

There are a number of references to the 'SW Licensing Team'. Given this is a multi-year application and the fact that police forces have a habit of restructuring on a regular basis, could this please be changed to an agreed MPS reference point? Should you restructure and the SW Licensing Team ceases to exist we will not be able to comply with those conditions.

The Metropolitan Police Service (MPS) objects to the application in its current form and has concerns in relation to three of the four licensing objectives, namely the prevention of crime and disorder, prevention of public nuisance and public safety. While it is recognised that this would be the first event managed at this location by the applicant and that this application must be considered on its own individual merits, the MPS is mindful that previous music festivals at Morden Park despite strict conditions have resulted in serious crime and disorder and public safety problems.

This opening statement straight away contradicts itself, and your own recognition above that 'this application **must** be considered on its own merits'. You are not considering this event on its own merit throughout your representations. Your repeated reference to the 'history of the location' is only relevant if made specific to this application. We would be grateful if you could expand on your concerns so that we can better understand your stance on key issues such as capacity, duration and SIA ratio.

This was particularly the case with the Eastern Electrics Festival held in August 2019. This application concerns a similar event, at the same location, and is likely to involve similar music and crowd dynamics. There are, in these circumstances, real concerns that similar problems would arise were this application to be granted in its current terms.

This is a similar event in respect of it being an open air music festival with a degree of DJ led music delivery. The similarities then cease. The audience are on average much older and of a different demographic, the requested capacity is less than half that of Eastern Electric (EE) and the attractiveness to, and overall risk from criminal activity is vastly reduced.

The precursor to this event was known as Southport and Transmission, held in Finsbury Park 2017 and 2018, and Crystal Palace Park in 2019. Finsbury Park is arguably a far worse location than Morden Park for event risk. There were no problems of any note and the crime statistics are available within the MPS. References can be obtained from Haringet and Bromley Councils. We only moved locations due to a major event company obtaining exclusive rights on those parks. We still have a valid licence for Finsbury Park.

LBM asked us to review our event, particularly the Sunday night, to ensure we were not bringing an event that could be construed as similar to EE. We did so and produced lineups that further increased the age demographic and focus on more mainstream, historical acts with an even lower risk of attracting criminal elements. As a result of their assessment LBM, at senior Cabinet level have authorised the hire of Morden Park for the Beautiful People and Southbound festivals.

We have already provided you with a breakdown of the 150 plus acts proposed for our two days with notes on their music style and genre. Given that in our meeting on 3rd June you raised the issue of common artists with EE we have undertaken an analysis which accompanies this response. We have found 5 common artists which as a percentage is at best minimal. Furthermore of those, three are in their forties with their peak in popularity in the early 2000's, one is a 50 year old from New York, the other a more recently successful

DJ from Essex. None have any link to gangs or criminal groups. Of the people we could have shared with EE these are of the least risk.

These concerns particularly inform the MPS views on capacity and the duration of the licence. And presumably the SIA ratio? We are struggling to see anything in these representations or from what was delivered at our meeting that evidences the justification for these conditions. We would be grateful for further information informing your assessment.

In many ways, Morden Park may be considered simply unsuitable as a location for music events of the proposed scale,  
From a conversation with Inspector Whitehead we are aware this appears to be the stance from the MPS.

Can we politely suggest that you have a conversation with your partner agency LBM. They are actively promoting what they refer to as 'event spaces 1 & 4' as large scale music festival spaces of 40,000 m<sup>2</sup> each. We are looking to use a small portion across each area for 9,999 people. Their promotion material also cites an audience of 20,000 for the fireworks. Firework events are renown for their late ingress and rapid egress which challenge park entry and exit routes.

Our proposed event site only occupies a very small portion of the park.

not least because large numbers of attendees will need to leave the event via narrow paths onto busy roads.

We are developing in, conjunction with LBM, an ingress and egress plan which uses a greater proportion of the park to minimise presence on the roads. We will employ measures such as staggered closure, crowd modelling and road closures to minimise risk. Approval of that plan could be a condition of the licence if it assists.

The previous event resulted in substantial disruption to local residents as a result of crowd dispersal, including public urination and general disorder.

This refers directly to EE again. The above plan will mitigate against such ASB.

The following is a non-exhaustive list of crime and disorder incidents that affected the 2019 music festival in Morden Park:

Not relevant unless specifically attributed to our application or risks evidenced from it.

If the Sub-Committee is minded to grant the application, the MPS requests that:

1. The capacity of the event be limited to 5,000 attendees per day, rather than the proposed 9,999. Fewer attendees reduces the risk of crime and disorder, public nuisance and the risk to public safety.

Yes it does but responsible event organisers assess the risk and increase mitigation as required. If risk was simply based on capacity we would not have 200,000 at Glastonbury. We should be given the opportunity to show how we can mitigate the risk associated with a 9,999 capacity.

The ability of officers to police the vicinity of the event

We would seek to minimise the need for policing particularly with our external protection plans. A poorly managed TEN's event can draw more heavily on police resources than a well organised large event.

and of internal security to protect attendees would be greatly increased.

We will base our security levels, both internal and external based on full risk assessments. Greater capacity requires greater security numbers, less capacity will result in less security, not the same security numbers.

2. Only a one year time limited licence is granted for 4th and 5th September 2021. Given the historical problems of this venue, this would allow the new applicant to demonstrate good in operating this event safely while promoting the licensing objectives. It would be open to them to apply for a further licence tailored specifically to any future music festival.

This assessment refers again to a previously unconnected event and does not judge this event on its own merits. It is a long established precedent within Licensing Act stated cases that someone applying for a longer period cannot be held to a 'test period' without full justification.

3. The offered conditions in Part M of the application be turned directly into conditions.

Accepted as of course we did offer them as starting negotiations.

4. The conditions set out below be added to the licence. The MPS has had limited time to consider the ESMD and other policy documents which were circulated by the applicant on 28th May 2021.

We apologise for the relatively late submission of the ESMP. This was not due ironically just to COVID, but a need to obtain further approval from LBM about the change of the artist line up, in particular Sunday to avoid any comparison with EE. As soon as LBM approved our new event details we have progressed the plans,

We have asked for and would very much appreciate a Safety Advisory Group meeting.

However, recognising the nature of the event proposed, it feels these conditions are appropriate and proportionate in the circumstances, and broadly reflect the approach taken to other similar events.

1. Event Specific Management Document (ESMD) An Event Specific Management Document to be completed outlining the proposed management structure, responsibilities and contact details for each individual event. The event management plans for each event shall include the following information as a minimum; site plans, stewarding/security plans to include regular weapon sweeps before, during and post egress

We discussed that these sweeps were on site only and not exterior. It would be helpful if you could define what a 'sweep' should constitute.

, crowd management plans, medical plan, fire plan, specific safety policies, risk assessments, traffic management plans, possible noise nuisance plans, and ingress/egress plan. In all cases, this shall be submitted to the Metropolitan Police three calendar months in advance of the event. Agreed

This has already been complied with for this year but would you like to suggest a final agreement date (usually 30 days or one month)?

The Metropolitan Police shall have an absolute power of veto where they are not satisfied with the measures proposed.

We have not seen this condition elsewhere and would like further detail of its meaning. Usually it is 'to the agreement of'. What does 'veto' mean and when can it be applied? If we have ignored your advice you already have powers within the Licensing Act to stop an event from going ahead.

We would respectfully suggest you seek legal advice on this condition. If you write in the power to 'veto' and do not do so, and then something goes wrong you could be found at fault in a civil claim by an injured party as you have effectively said the plans are approved by MPS.

This is a strong condition for an established event company with a good track record.

2. Information of Artists and Performers Details and information of Artists, Performers and Promoters must be presented to the Metropolitan Police 3 months in advance of events.

Already complied with, any feedback would be appreciated.

The Premises Licence Holder will work closely with <https://www.safersounds.org.uk> What does this mean? We have contacted them but not received a reply. They offer many services. Is this just about a risk assessment of our act line up or a greater requirement? Does this mean the MPS will not be risk assessing artist line ups themselves?

If the Metropolitan Police identify concerns within 14 days of the submission of this information regarding a particular artist or group the event organiser will remove that artist or performer from the line-up. If at any time MPS/Safer Sounds identify valid concerns regarding a particular artist or group, the event organiser will work closely with them to attend to the issue raised.

Yes as long as they evidenced concerns relating to the Licensing Objectives.

3. CCTV shall be in operation throughout licensable hours, and must include: Main public entrance/exits, back of house entrance/exits and entrance/exits for Artist, Promoters and Entourage. All Stages/viewing areas, all Arenas/Tents and all bars. During the events any CCTV request made by Police should be provided on a useable digital format immediately.

As discussed there is a real plus to add a condition of face recognition capture on any eviction.

Also as discussed there is a real question of value of CCTV on stages particularly in marquee arenas due to lighting effects. We believe this comes from artists' behaviour on stage at EE which is not applicable to our artist selection. Could we refer to A) below and agree where CCTV can be operated effectively?

A) A closed-circuit television (CCTV) system shall be installed at the premises and positions of the cameras shall be agreed with the Metropolitan Police prior to an event taking place.

Agreed

B) The CCTV system installed at the premises shall be maintained in effective working order and shall be in operation at all times the premises is open to the public. Agreed

C) All recordings made by the CCTV system shall be retained and stored in a suitable and secure manner for a minimum of 31 days and shall be made available on request to the Metropolitan Police, the Licensing Authority or other Responsible Authorities. Agreed

D) At all times the premises is open to the public a minimum of one member of staff on duty will be able to operate the CCTV system. Agreed

E) When the premises is closed or out of hours the Premises Licence Holder will be provide CCTV footage to the Metropolitan Police upon request. [Agreed](#)

#### 4. [Generally agreed but see below](#)

The Security and Incident Log The Security and Incident Log shall be kept on the premises and completed on each occasion an incident as listed in A-J below occurs: The security and Incident log (which may be electronically recorded) shall be kept with the Premises Licence Holder at least six months, and made available on request to police or an authorised officer. The following details shall be recorded:

- (a) All crimes and any incidents reported to the site; [yes but we ought to agree on channels so they are captured](#)
- (b) Location of incident.
- (c) Persons concerned
- (d) Summary of incident
- (e) Identification of any Emergency Services Personnel who attended. [probably not for us to capture, we can confirm attendance but not your staff details, that is for you to confirm](#)
- (f) All ejections of patrons
- (g) Any complaints received
- (h) Any visit by a relevant authority or emergency service [as above there is a degree of reliance on agencies assisting us with identification and the time on site as we will not necessarily know you have left.](#)
- (i) Any other incident or event that impacts upon the promotion of the Licensing Objectives within the Licensing Act 2003.
- (j) Record of all Security searches of the site including dates and times. [Is this physical site searches or does it include vehicles and persons?](#)

5. Event Site Security The Event site will have 24/7 CCTV in operation at the start of build until the end of build. All recordings made by the CCTV system shall be retained and stored in a suitable and secure manner for a minimum of 31 days and shall be made available on request to the Metropolitan Police, the Licensing Authority or other Responsible Authorities. A minimum of one member of staff on duty will be able to operate the CCTV system. [As discussed we need to clarify this further. Start of build is marking grass, then comes steel shield, then comes infrastructure we can hang CCTV cameras on. Cameras will not be available from the start of this event build or at the end of derig. This is not unique to this event and should not be seen as unusual. We will not have CCTV until the wifi is connected, that is usually operational by the Friday before the show.](#)

The event site will be monitored 24/7 by security staff in order to prevent unauthorised persons gaining entry to the site this shall form part of the ESMD. Double fence line at least 20 feet apart at all points and Height 2.4 metres with 30cm overhang. [Could we have just one unit measure of measurement please? We can agree to a fence gap of 6m, unless agreed in advance for safety reasons.](#)

[2.4m is actually very low and very climbable. 30cm overhang is also very narrow. We use a 3.4m high steel shield. Would this be a sufficient condition without the overhang condition?](#)

[We have 300m of overhang available which we place based on a risk assessment basis looking at more vulnerable areas of the fence line. For this event this would be more than 30% of the fence length. This is supported by raised security viewing platforms along the fence line. This makes the height well over 3.5m, and far in excess of your requirement.](#)

A weapons sweep must be conducted of the event site following completion of the event build up but prior to the event opening to the public. Regular weapon sweeps shall be carried out of the event site and shall be recorded in the Security and Incident log.

Please just add we will agree in advance what a 'weapons sweep' means so we understand expectations.

6. Admission Search Policy – All Staff, Artists, Promoters and Entourage. The Premises License Holder shall operate an admission search policy for all staff, artists, promoters and entourage.

This will be to the same standard as public admission.

A Separate Dedicated Security Industry Approved Company

Please provide the justification for a separate company. We have a long evidenced history of artist searching to a high standard with no compromise or alternative arrangements for artists.

to be employed providing SIA security staff at each event to search all Staff, Artists, Promoters and Entourage. The search will operate a 3 stage process: Passive Drug Detection Dogs (minimum of 2 K9 units per event), Wand Metal Detector, Visual & Physical Search (hands on) All bags will be searched and all those entering will pass through the metal detector and/or wands search area. Searches will be carried out by SIA Registered staff of the same sex.

Otherwise agreed.

All members of staff shall be instructed not to consume alcohol nor to take drugs when working on site or in uniform and shall not be under the influence of drink or drugs whilst working.

Not sure why this is in this section but agreed.

7. Security Industry Approved (SIA) Staff SIA Security staff will be deployed at the event at a ratio of 1:50.

As discussed this is a very high level which we have not encountered before. We have obtained many licences before including for events that could be considered greater risk and have never been required to provide this level. We suspect that this request again refers to experiences with EE rather than an assessment of our plan.

We have looked for a 1:50 event as we have not seen this high before. It appears Garage Nation have this level for this year. This is a much more risky event with a different younger demographic and a history of gang violence. We do not feel that we are in the same league.

Please provide further information for the justification for this condition.

Body Worn Video will be worn by all SIA door staff who are deployed at the premises including all entry points and those dealing with the ejection of attendees from the event.

This request appears excessive for our event and would be cost prohibitive. The SIA qualification does not include training on Body Worn Video and therefore there would be a significant training requirement.

We risk assess the requirement for such cameras. For example, we deploy them to search team and response team supervisors. They are not applicable to all roles such as non-public contact postings such as inside a steel shield emergency exit or on a raised external viewing platform.

Please bear in mind this is in addition to CCTV, and hopefully drone provision.

When SIA Security staff are deployed ensure that records are kept by the DPS, at the premises, of the following details of any door-supervisor employed at the premises: Name and date of birth, full 16 digit SIA badge number and dates and times employed. These records must be made available, in useable form, to the Metropolitan Police, Merton Council officers or authorised officers of the Security Industry Authority upon request. SIA Security staff wearing BWV shall begin recording should there be any disruption of Crime and Disorder, or if they deem it appropriate when an incident occurs. In the event that body worn cameras are switched on, these will only be turned off again once the incident has been defused and brought under control. [Agreed](#)

All recordings [is this all recordings \(BWV, CCTV, drone\) or are you still referring to BWV?](#)

shall be stored for a minimum period of 31 days with date and time stamping. Viewing of recordings shall be made available immediately upon the request of the Metropolitan Police or authorized officer of the Licensing Authority. A staff member from the premises who is conversant with the operation of the body worn cameras shall be in the premises at all times when the premises is open. This staff member must be able to provide to the Metropolitan Police or authorized council officer copies of recent images or data with the absolute minimum of delay when requested and within a maximum of 24 hours of the initial request. Subject to Data Protection guidance and legislation, the management of the premises will ensure that key staff are fully trained in the operation of the cameras, and will be able to download selected footage onto a disk/USB Stick for the Metropolitan Police or authorized officers of the Local Authority or UK Border Agency without difficulty, delay or charge. [Agreed with above clarification](#)

Any camera breakdown or system failure will be notified to the SW Police Licensing Team and Local Authority immediately [please advise on out of hours reporting procedures](#)

& remedied as soon as practicable. Any queue to enter the premises that forms outside the premises shall be kept orderly and supervised by SIA door supervisors to ensure that there is no nuisance or obstruction to the public highway and footpaths. All staff engaged outside the entrance to the premises and inside the site, or supervising or controlling queues, shall wear high-visibility jackets or vests. [Agreed](#)

8 Condition of Entry and Searching Procedures All attendees to the event will be subject to search. The search will operate a 3 stage process: Passive Drug Detection Dogs (minimum of 2 K9 units per event), Wand Metal Detector, Visual & Physical Search (hands on). All bags will be searched on entry. Searches will be carried out by SIA Registered staff of the same sex. [Agreed. We were looking to limit bags to A4 maximum if you would like that as a condition.](#)

Passive Drug Detection Dogs and Explosives Detection Dogs will carry out a sweep of the event site following completion of the event build up but prior to the event opening to the public. The catering, merchandise stalls and any customer lockers will be included during this sweep. The Premises Licence Holder will operate an anti-drugs policy in conjunction with a search and seizure policy in compliance with agreed memorandum of understanding with the Metropolitan Police. This will also include storage and disposal procedures. Signage will be displayed throughout the premises. [Agreed](#) Any amendments to the policy must be agreed in writing with South West Licensing Team 30 days prior to any event. [See above](#)

A clear visible notice shall be placed at the entrances to the premises advising those attending, that it is a condition of entry that customers agree to being searched and the Metropolitan Police will be informed if anyone is found in possession of controlled substance

or weapons. Anyone found with drugs will be refused entry, more than the agreed quantities for personal consumption (as outlined in the drugs policy) of controlled substances or NPS the Metropolitan Police will be informed immediately. [Needs rewording](#)

The Drugs Policy will include New Psychoactive Substances (NPS) and No2/NOS/Nitrous Oxide. No2 will not be permitted on site and any found on entry will be confiscated [Agreed](#)

9. Locked Amnesty Bins The Premises Licence Holder shall provide separate locked amnesty bins for the disposal of alcohol, drugs, weapons and other waste. This will also include storage and disposal procedures. Any amendments to the policy must be agreed in writing with South West Police Licensing Team 30 days prior to any event. [Agreed](#)

10. Weapons Policy Anyone found with an offensive weapon will be ~~ejected/refused entry to the event, detained~~ [this just needs to say detain](#) by SIA security staff the Metropolitan Police informed immediately and the attendee detained until police arrival. The Premises Licence Holder will operate a weapons policy in conjunction with search and seizure. Any amendments to the policy must be agreed in writing with South West Police Licensing Team 30 days prior to any event.

11. Anti-Theft Policy The Premises Licence Holder shall operate an anti-theft policy, which will include the reporting of theft, safe storage of found items, storage and disposal procedures for all items of property found or discarded at the premises. Signage will be on display in prominent places advising customers to safeguard their property. Any amendments to the policy must be agreed in writing with South West Police Licensing Team 30 days prior to any event. [Does this have to be a stand alone policy or can it be covered in the ESMP?](#)

12. Dispersal Policy The Premises License Holder shall display appropriate signage to direct all event attendees towards to the nearest transport links should be displayed and this should occur throughout the entire event. Attendees should be reminded that the event is in a residential area and that they should disperse quietly. There shall be a documented dispersal policy, as agreed with the relevant responsible authorities, implemented at the premises and a copy lodged with the South West Police Licensing Team. Any amendments to the policy must be agreed in writing with the South West Police Licensing Team 30 days prior to any event. [Agreed](#)

13. Challenge 25 Scheme A Challenge 25 scheme must be operated to ensure that any person attempting to purchase alcohol who appears to be under the age of 25 shall provide documented proof that they are over 18 years of age. Proof of age shall only comprise a valid and in date passport, photo card driving licence, military card or a card bearing the PASS hologram. All bar staff at the event will be trained, this training should reflect the Licensing Act 2003 and include the licensing objectives, proof of age, and conflict management. The training will be refreshed every 6 months and all staff training records should be maintained and kept on site. A designated member of staff should be able to produce the records on the request of police or other authorised person. [Effectively agreed but this is clearly a permanent premises condition. Event bar staff are mostly agency staff employed on an event by event basis. What we do is:](#)

- [Provide a bar briefing to all staff.](#)
- [This is a written brief included in the ESMP for prior agency approval.](#)
- [The briefing is delivered by the DPS or nominated deputy.](#)
- [Staff sign an individual copy of the bar brief to confirm they understand the briefing.](#)
- [Those copies are retained and available for inspection.](#)

14. Polycarbonate Drinking Vessels Drinks will not be served in glasses or glass bottles on site. Polycarbonate drinking vessels are used for all alcoholic and soft drinks served to

attendees and that all drinks supplied in glass bottles will be decanted into polycarbonate serving or drinking vessels. No alcohol will be permitted to be taken off the licensed site. Customers shall only consume alcohol which has been purchased from the premises. Each Bar and Tent shall be individually managed by a personal licence holder, during licensable hours. [Agreed](#)

15. Litter There will be a proper and adequate control of litter generated by the premises and will be stored securely in a designated area, bins should be placed near to the exits at the site. To ensure that the site is clear of litter after site break down. Staff will be removing all litter from public areas on a regular basis. The Premises License Holder shall ensure a dedicated cleaning company will be employed to pick up all litter relating the events on Sunday 5th September and Monday 6th September – This shall form part of the ESMP. [And Saturday, and an external litter plan, and have the ability to respond to public complaints of litter off site.](#)

16. ACT Condition The Premises Licence Holder shall engage with freely available counter terrorism advice and guidance through Counter Terrorism Protect Officers and Counter Terrorism Security Advisors. All members of customer facing staff, including those involved in the sale or supply of alcohol, undertake Action Counters Terrorism (ACT) Awareness eLearning, on an annual basis (as long as such, or similar, training is available). Such training is available at <https://www.gov.uk/government/news/act-awareness-elearning>. [Again this is rather permanent premises based, we cannot ensure annual retraining of agency staff, but would like to agree an appropriate training condition.](#)

17. [Again, this seems to be a permanent premises condition.](#)

A direct telephone number (mobile to be held by duty manager) [we provide a landline in the control room staffed at least one hour before opening and at least one hour after closure. We will confirm arrangements for other times during build and break](#) will be provided to neighboring premises to be used in the event of a complaint of noise nuisance. A direct telephone number for the License Holder/DPS/manager of the premises shall be publicly available at all times that the premises is open. The number is to be made available to residents and businesses in the vicinity. Any complaints shall be remedied [\(not sure we can guarantee remedy! Response, action yes\)](#). within 48 hours and details to be recorded in the incident book including the action taken by the License Holder/DPS/manager. [Each bar will have an incident book is it not better to include in a control room log.](#)

18. The Premises License Holder shall run each event with the latest event specific management document that has been agreed in writing at the latest SAG meeting. [Agreed](#)

19. The Premises Licence Holder shall operate a vulnerable person policy, this must include WAVE training and Ask for Angela for all members of staff. [Agreed but probably not all staff, ie none public facing production and build staff? Permanent premises licence condition?](#)

20. The Premises Licence Holder will allow all uniformed and plain clothes Metropolitan Police to periodically attend the premises upon prior agreement with the Premises Licence Holder/DPS in order to carry out advance drug searching techniques, including (but not limited to) requiring customers to take part in drug analyser testing as a condition of entry, and passive drug dogs sweeps of the premises and queue. [Agreed](#)

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