

Appendix 2

Aileen Powell

From: steve.licensing [REDACTED]
Sent: 12 October 2020 19:01
To: Gosling, Gareth; Louise Gosnold
Cc: Busfield, Louise; Aileen Powell; Tony Grant; Licensing Team C; graham.bel [REDACTED] clivebaileywtfc [REDACTED]
Subject: FW: Objection - Wimborne Town FC Premises Licence Application
Attachments: ameded operating schedule.docx; WIMBORNE TOWN FOOTBALL CLUB RISK ASSESSMENT IN RELATION TO LICENSABLE ACTIVITIES.docx; WTFC CCTV Plan 16.07.20[6234].pdf

Dear Gareth,

Further to my response to your objection detailed below, together with the attached supporting documents, can I suggest that it may help proceedings if you could let me know which points remain a point of contention before the hearing, so that the others may be dispensed with in advance to save time.

The football club is willing to consider further modifications in advance of the hearing to expedite hearing proceedings, or even agree that a hearing is unnecessary. Therefore, if you need further clarification on any matter please let me know by email, or alternatively I would be happy to discuss on phone.

Thanks.

Steve Ricketts
[REDACTED]

Sent from [Mail](#) for Windows 10

From: [steve.licensing \[REDACTED\]](mailto:steve.licensing [REDACTED])
Sent: Wednesday, October 7, 2020 8:17 AM
To: licensingteamb@dorsetcouncil.gov.uk
Subject: Fwd: Objection - Wimborne Town FC Premises Licence Application

Just in case you haven't picked this up with Louise being off

Get [Outlook for Android](#)

From: steve.licensing [REDACTED] <steve.licensing [REDACTED]>
Sent: Thursday, 1 October 2020, 15:49
To: gareth.gosling@dorset.pnn.police.uk; Louise Gosnold; licensingteamc@dorsetcouncil.gov.uk
Cc: Busfield, Louise; Tony Grant; graham.bel [REDACTED] clivebaileywtfc [REDACTED]
Subject: RE: Objection - Wimborne Town FC Premises Licence Application

Good Morning Louise and Gareth,

Further to the objection below, please find an attached document proposing amendments to Wimborne Town Football Club's volunteered conditions, aimed at addressing Dorset Police's concerns. Unless stated as 'deleted' in the attached document, all other wording in the original application's operating schedule remains valid. In the main, amended and additional conditions have been taken from the Council's Model Pool of Conditions.

The accompanying risk assessments have informed the revised operating schedule, gives details of the multi function uses, and is designed to be reviewed and updated on a regular basis in the light of experience of operating the new premises. It does not seek to duplicate risks addressed by other statutory obligations/and or covered by mandatory conditions

Whilst one of the proposed conditions requires compliance with the 'current risk assessment', Dorset Police could request changes to it at any time under another suggested condition, without the need for possible review/variation applications. The risk assessment should therefore be viewed as a dynamic/evolving operational document.

Wimborne Town Football Club was founded in 1878 and has always been a club mainly run by volunteers. It is a true community club which encourages youth teams, with parents and families often participating in its smooth running.

Since the enactment of the Licensing Act 2003, the club has operated at its current premises at Cuthbury, Wimborne under the conditions originally submitted in this application, without any requests for variations to those operating conditions by Dorset Police, and certainly no formal Review applications being submitted.

However, due to new residential developments in Wimborne, it is now necessary to relocate to brand new premises at Ainsley Road, Wimborne, hence this application being submitted. I therefore understand that the club's new neighbourhood is somewhat different to Cuthbury's, and the Club respects the newly raised concerns in Dorset Police's objection.

However, whilst the premises applied for is a 'new build', the management's organisation remains fundamentally the same as at Cuthbury, which has never been accused of undermining licensing objectives. The club will also *operate* in pretty much the same way as it has done as Cuthbury. Given the lack of enforcement issues over the last 15 years, since being licensed by the Council, this ,in itself, should provide some 'confidence in management' when scrutinising the attached documents.

To give some further perspective to the application, whilst the ground has a capacity of 2100, football matches average between 200 – 300 spectators. It is estimated that only 50% will normally enter the club house during match days. Of those entering, only between 5% - 10% would normally wish to take their drinks into the ground.

So the numbers actually using the licensed premises is in fact very similar to an average community hall/club in Dorset. Indeed, the type of events that the premises intends to hold in the club house, other than football match days, will be akin to that of a community hall; local birthday parties and similar celebrations etc, dinner/guest speaker nights, meetings, yoga, aerobics etc.

I would therefore ask that proposed Conditions take into account the characteristics of the club and proposed events to avoid, where possible, the imposition of disproportionate and overly burdensome 'standardised' conditions, whilst still promoting the licensing objectives.

Part of those 'characteristics' is that the club will be leasing the premises from the Dorset Council, being subject to strict lease restrictions. In addition, Wimborne Town Football Club plays in the Southern Premier Amateur League, and comparisons with neighbouring Club, Bournemouth FC, only recently relegated from England's top flight professional multi-million pound's premiership league, could be said to be a somewhat disproportionate comparison.

I would also ask that Dorset Police consider the application based on the '*likely effect*' on the licensing objectives, rather than using a '*worse scenario*' approach.

Other statute, specific to football clubs, in relation to the supply of alcohol, acknowledges the different characteristics of a small non-league club, to that of the professional club scene. I refer specifically to the Sporting Events (Control of Alcohol, etc) Act 1985 which, whilst currently banning alcohol from being taken into professional club stadiums, generally permits consumption of alcohol in amateur football grounds..

With the above in mind, I trust in Dorset Police and the Council to be able to promote the Licensing Objectives, whilst at the same time being considerate to the challenges facing small amateur community clubs, such as Wimborne Town FC.

If there are any further amendments to the proposed conditions please let me know so that I can put them to the Directors of the Club, and hopefully agree that a hearing is not necessary.

Your sincerely,

Steve Ricketts,
Authorised Agent on Behalf of Wimborne Town Football Club.

Sent from [Mail](#) for Windows 10

From: [Gosling, Gareth](#)
Sent: Tuesday, September 29, 2020 10:11 AM
To: licensingteamc@dorsetcouncil.gov.uk; steve.licensing@wimbornefootballclub.com
Cc: [Busfield, Louise](#); [.Licensing](#); [grantontony@wimbornefootballclub.com](#)
Subject: Objection - Wimborne Town FC Premises Licence Application

Good Morning Steve,

Further to the below application and the subsequent visit to the site by Louise Busfield, I have discussed Louise's observations and I have some concerns regarding this licence for Wimborne Town Football Club in that I believe that there are some omissions from the licence application that risk undermining the licensing objective of the Prevention of Crime & Disorder.

Those concerns are best summarised as follows –

1. Inadequate risk assessments in respect of events to be held at the premises. Lack of specific details within the operating schedule to address the multiple uses of the premises and the consequent risks associated with those uses. –
2. Insufficient safeguarding for the use of glass within and outside the premises.
3. No allowance made for the nearby presence of a children's play area when off-sales are being applied for. Lack of requirement for an incident book which is considered a basic requirement for any licensed premises.
4. No requirement for the premises management to be a member of any existing or future Pubwatch or Townwatch scheme.
5. Inadequate SIA schedule which doesn't fully address the concerns that are present on certain 'high risk' evenings/events, such as NYE etc.
6. Inadequate staff training requirement detailed within the application.
7. Insufficient SIA conditions covering the specific requirements to manage the risks of certain events, such as football matches or high risk events.
8. Off Sales – If it is the intention for this to be a general purpose premises, I would ask why there is a requirement for off-sales to be contained within the application.
9. There is currently no requirement for CCTV between the proposed opening date in November 2020 and 1st January 2021 detailed within the application.

I look forward to receiving your further written comments on the above in due course.

Whilst I expect that you have a pre-prepared list of current 'model' conditions, should you wish for us to provide further support in this regard to address concerns that we have with the enforceability of some of the proposed conditions, please advise as I do have some concerns with some of the proposed conditions as submitted.

Dorset Council Licensing Department – Please accept this correspondence as our [objection](#) to this application for a premises licence at Wimborne Football Club. It is our intention to mediate further with the applicant's representative to hopefully avoid the requirement for a Sub-Committee Hearing.

Regards,

Gareth

Gareth Gosling 2551
Sergeant

Drug and Alcohol Harm Reduction Team
Territorial Policing Prevention Department | Bournemouth Police Station, Dorset Police
E: gareth.gosling@dorset.pnn.police.uk | T: 752 2824 (01202 222824) |

Connect with Dorset Police: [Online](#) | [Facebook](#) | [Twitter](#) | [LinkedIn](#) | [Youtube](#)

This e-mail is intended for the named recipient(s) only and may contain privileged information, which is protected in law. If you have received this e-mail in error, please contact the sender to advise them and delete this e-mail. Unauthorised use, disclosure, copying or distribution is prohibited.

E-mail should not be regarded as a secure means of communication, we take all reasonable steps to ensure that e-mails are protected from malware, but cannot accept liability for any loss or damage, howsoever arising, as a result of their transmission to the recipients' computer or network.

For more information, or to contact us, please visit us at www.devon-cornwall.police.uk or www.dorset.police.uk or e-mail 101@devonandcornwall.pnn.police.uk or 101@dorset.pnn.police.uk

**WIMBORNE TOWN FOOTBALL CLUB AMENDMENTS/ADDITIONS TO OPERATING SCHEDULE
ADDRESSING POLICE OBJECTION (POLICE COMMENTS IN BLUE)**

**NUMBERS CORRESPOND TO DORSET POLICE POINTS MADE IN EMAIL DATED 29TH SEPTEMBER FROM
SERGEANT GOSLING**

**(Unless stated as deleted, the other steps detailed in the operating schedule in the application form
remain valid and should be read in conjunction with this document)**

1. **Inadequate risk assessments in respect of events to be held at the premises**

See attached risk assessment

Add additional conditions:-

The licensed premises shall be operated in line with the premises licence holder's risk assessments in relation to licensable activities, which shall be available for inspection by any authorised person upon request.

The premises licence holder's risk assessments in relation to licensable activities shall be kept under regular review, and updated from time to time, so that operational matters may be improved if considered appropriate.

Responsible Authorities may request alterations to the risk assessments at any time to better address the licensing objectives in operational matters.

2. **Lack of specific details within the operating schedule to address the multiple uses of the premises and the consequent risks associated with those uses.**

See attached risk assessment as well as amended wording of operating schedule below in line with Dorset Police objection.

3. **Insufficient safeguarding for the use of glass within and outside the premises.**

Delete wording in application:- *{No alcohol consumed outside of the clubhouse, other than on the patio area within the immediate vicinity of the clubhouse, shall be contained within glass containers of any kind. They shall be instead decanted into plastic/polycarbonate or other suitably safe drinking vessels. (This condition is aimed mainly at spectators wishing to consume drinks within the football ground)}*

Replace with the following new wording :-

- (a) No alcohol shall be permitted into the football ground during any match governed by the Football Association, mainly being cup knockout games.
- (b) No alcohol shall be permitted into the football ground during any other match, in addition to those specified in 3 (a) above, which the Designated Premises Supervisor/Premise Licence Holder decides appropriate. Such a decision may be taken after assessing the special circumstances and risks of individual matches, including significantly increased numbers of spectators.
- (c) Dorset Police may request an assessment under condition 3(b) to be completed, if there are specific concerns with allowing alcohol into the football ground during specific fixtures not governed by the Football Association. Such requests must be made in writing to the club at least 5 days before such fixtures, explaining the exceptional reasons why the likely effect of allowing alcohol into the ground during the identified fixture(s), would undermine the licensing objective of preventing crime and disorder.
- (d) During matches not restricted by 3 (a) or (b) above, items of glass-wear (such as glasses, bottles, etc) shall not be permitted in the football ground. Instead, all such beverages (including alcoholic and non-alcoholic drinks) taken into the football ground, shall only be dispensed in polycarbonate, plastic, non-glass containers, or toughened or safety glass to the appropriate safety standard (in that they shall not produce sharp shards when broken).
- (e) No alcohol, in open containers, shall be permitted to be taken out of the licensed premises via the front entrance door, at any time.
- (f) No consumption of alcohol, served from the licensed premises, shall be permitted in any outside area in front of the premises, or within the car park area, at any time.
- (g) . No person shall be allowed to the football pitch or licensed premises if they are known to have alcohol in their possession
- (h) Signs shall be placed in conspicuous locations, including on the front door, informing patrons of conditions 3(e), (f) and (g) above.
- (i) Football spectators shall be encouraged by stewards to purchase tickets and enter via the turnstiles, rather than entering through the front entrance to the

licensed premises.

- (j) The designated premises supervisor shall arrange for regular checks to be made of the front area, which may include use of CCTV, to ensure that conditions 3(e) and (f) and (g) are complied with at all times.
- (k) Part of the duties of any security staff employed shall include the effective monitoring of the front of the premises to ensure compliance with conditions 3(e), (f) and (g) above.
- (l) The Club will operate a policy of zero tolerance of customers repeatedly breaching conditions 3(e), (f) and (g) above by refusing entry to such persons to both the licensed premises and football ground such for at least 6 months.

4. No allowance made for the nearby presence of a children's play area when off-sales are being applied for.

Add additional condition:-

- (a) Off –sales may only be made to those consuming alcohol within the football ground area in compliance with condition 3(d) above.

5. Lack of requirement for an incident book which is considered a basic requirement for any licensed premises.

Add Additional Conditions:-

- (a) The Premises Licence Holder shall ensure that an "Incident report register" is kept in a bound book, in which full details of all incidents are recorded. This shall be completed as soon as possible and in any case no later than the close of business on the day of the incident. The time and date when the report was completed, and by whom, is to form part of the entry.
- (b) The register is to be kept on the premises at all times and shall be produced to an authorised officer of the Licensing Authority or the Police when required.

6. No requirement for the premises management to be a member of any existing or future Pubwatch or Townwatch scheme.

Add additional Condition:-

- (a) As soon as possible, and in any event within 1 month from the grant of this licence, the premises shall join the local pubwatch or other local crime reduction scheme approved by the police, and local radio scheme if available.

7 and 9.

Inadequate SIA schedule which doesn't fully address the concerns that are present on certain 'high risk' evenings/events, such as NYE etc.

Insufficient SIA conditions covering the specific requirements to manage the risks of certain events, such as football matches or high risk events.

Delete wording:- *{SIA security staff shall be employed at the premises during any 18-21st birthday parties, or any other event for which a risk assessment has shown a similar need. A risk assessment shall be undertaken for each of these events to assess the numbers of SIA staff required in each case, taking into account the number of attendees.*

Such security staff shall wear high visibility clothing to ensure they are clearly seen and distinguishable from customers.

The DPS shall keep a written record of each security staff's SIA badge number.}

Replace with following :-

- (a) SIA security staff shall be employed at the premises during any events identified in the Premises Licence Holder's risk assessment as requiring such steps to be taken.
- (b) During football match days, the number of voluntary stewards and SIA security staff shall be provided in line with the risk assessment in relation to licensable activities.
- (c) All SIA security staff and/or voluntary stewards shall wear distinctive clothing or insignia to clearly identify them . They shall wear some form of 'high visibility' clothing (such as a jacket or waistcoat).
- (d) The premises licence holder shall ensure that all SIA security staff on duty at the premises wear a current identification badge, issued by the Security Industry Authority or under any accreditation scheme recognised by the Security Industry Authority, in a conspicuous position to the front of their

upper body.

- (e) The premises licence holder shall ensure that any SIA security staff and/or voluntary stewards are made fully aware of all conditions of this licence.
- (f) All SIA security staff and voluntary stewards shall be capable of communicating instantly with one another by way of radio or other simultaneous system of communication.
- (g) The premises licence holder shall ensure that the following details for each SIA security staff and voluntary steward used, are contemporaneously entered into a bound register kept for that purpose:
 - i. Full name,
 - ii. SIA Certificate number and or badge number, or registration number of any accreditation scheme approved by the SIA.
 - iii. The time they began their duty
 - iv. The time they completed their duty.
- (h) This register is to be kept at the premises at all times and shall be so maintained as to enable an authorised officer of the Licensing Authority or a constable to establish the particulars of all SIA security staff and voluntary stewards engaged at the premises during the period of not less than 28 days prior to the request, and shall be open to inspection by authorised officers of the Licensing Authority or the Police upon request.

8. Inadequate staff training requirement detailed within the application.

Delete Wording:- *{ All staff shall be trained in the laws and procedures concerning the sale of alcohol, as well as made aware of the conditions of this licence. Refresher training shall be given annually, and records of those trained kept for at least 24 months.}*

- a. The Licensee will ensure that each member of staff authorised to sell alcohol has received adequate training on the law with regard to the sale of alcohol and conditions of this licence, and that this has been properly documented and training records kept.
- b. The Licensee will ensure that each member of staff authorised to sell alcohol is fully aware of his/her responsibilities in relation to verifying a customer's age and is able to effectively question purchasers and check

evidence of proof of age.

- c. The Licensee will ensure that each member of staff authorised to sell alcohol is sufficiently capable and confident to confront and challenge under - 18s attempting to purchase alcohol.
- d. The Licensee will keep a written record of all staff authorised to sell alcohol, the record to contain the full name, home address, and date of birth of each person so authorised.
- e. The staff record to be kept on the licensed premises and made available for inspection by the Licensing Officer, Trading Standards or the Police.
- f. The training record to be kept on the licensed premises and made available for inspection by the Licensing Officer, Trading Standards or the Police.

9. See paragraph 7

10. Off Sales – If it is the intention for this to be a general purpose premises, I would ask why there is a requirement for off-sales to be contained within the application.

See 4(a) above.

{Application modified so as to not allow off-sales apart for persons taking alcohol into the ground during a football match}

The licensed premises will be the clubhouse building, as per the licence plan, and not include the football ground. Therefore strictly, the consumption of alcohol within the football ground, is an 'off-sale'.

11. There is currently no requirement for CCTV between the proposed opening date in November 2020 and 1st January 2021 detailed within the application.

Bearing in mind, CCTV is not a mandatory requirement, the intention of this wording was to allow a short period after opening to install CCTV, as this is the responsibility of the Club, and not the developers.

However, given this objection :-

Delete Wording:- *{ A suitable and effective CCTV system shall be installed on the premises, covering the immediate outside areas, by 1st January 2021. }*

Replace with :-

(a) A suitable and effective CCTV system shall be installed on the premises.

-

{continue with remaining wording on CCTV requirements in application form}

WIMBORNE TOWN FOOTBALL CLUB RISK ASSESSMENT IN RELATION TO LICENSABLE ACTIVITIES AND THE PREVENTION OF CRIME AND DISORDER

Risk Matrix

H – High, M- Medium, L - Low

| | | | | |
|-------------------|---------------|------------|---------------|-------------|
| Likelihood | High | M | H | H |
| | Medium | L | M | H |
| | Low | L | L | M |
| | | Low | Medium | High |
| Impact | | | | |

| Category of Event | Type of event | Identified Risks | Unmitigated Risk Level | Mitigating Steps | Mitigated Risk Level |
|------------------------------|----------------------|--|-------------------------------|--|-----------------------------|
| <u>ALL categories of use</u> | ALL | Risk of unauthorised break in | M | Install a security alarm | L |
| | | Staff/stewards/security not aware of laws and conditions of licence | H | All staff and stewards will be appropriately trained. SIA staff, when employed, will be made aware of licence conditions | L |
| | | Nearby skateboard area may attract under –age persons trying to obtain alcohol from the premises | M | Prohibit the taking and consumption of alcohol through the front door/ and into car park area and beyond Prohibit any off-sales other than to be consumed in the football ground on permitted matches | L |
| | | Persons having caused problems in licensed premises in town, and refused entry, may gain access into the football club | M | Join pub-watch scheme and associated radio link scheme | L |
| | | Overcrowding of inside licensed premises | H | Limit mainly seated functions to a maximum of 200 patrons (such as guest speaker dinners etc).; Limit general usage to maximum of 400 patrons in all cases. | M |

| | | | | | |
|----------------------------|----------------------|--|----------|---|----------|
| | | | | The football ground limited to 2100 spectators | |
| | | Stewards/security staff may not be recognisable in the event of an emergency | H | They shall be required to wear distinctive clothing. | L |
| | | There is a large area to be monitored , so effective communication/surveillance is important | H | All Voluntary stewards and SIA security staff when employed shall be equipped with 2-way radios, or similar. CCTV needs to be installed to assist in the monitoring of the premises and the retrospective identifying of offenders etc. The location of cameras to be located as on the attached plan | L |
| <u>Football Match Days</u> | All Football Matches | Un-supervised crowds may lead to crime and disorder/breach of conditions, although experience dictates that this is not a high likelihood at this club | M | Require at least 4 voluntary stewards at all games, or at a ratio of 1:100, whichever the greater, subject to a maximum requirement of 12 voluntary stewards. The estimated crowd attendance will be calculated by ticket sales and estimated number of spectators, based on previous matches. If a crowd is estimated to be greater than 600, then at least 1 SIA security staff, or at a ratio of 1:700, whichever is greater, will be employed to support the voluntary stewards. If SIA security staff are employed at football matches in line with above, their main duties will be to monitor capacity numbers in the clubhouse and rules relating to the taking of drinks into the ground or to outside areas. | L |
| | | Allowing alcohol into the football ground in receptacles made of glass may result in public safety | H | No drinks of any kind shall be taken into the ground in glass containers | L |

| | | | | | |
|--------------------------------|---|--|----------|--|----------|
| | | concerns | | | |
| | | Dorset Police/Club may have intelligence that gives concerns in particular matches relating to consumption of alcohol in the ground | M | Allow the DPS to prohibit, and Dorset Police to request by way of condition, the prohibition of alcohol into the ground, in <i>any</i> match they have special cause for concern | L |
| | | Spectators may bring alcohol with them and attempt to take it into the ground, although the likelihood is low at this club | M | <p>Taking alcohol, not purchased from the licensed premises, into the football ground will be prohibited.</p> <p>Erect signs notifying spectators that no alcohol is permitted through the turnstiles</p> <p>All entry to the football ground shall be via the turn-stiles</p> <p>Spectators repeatedly breaching these rules regarding restrictions on alcohol shall be barred from the premises</p> <p>CCTV will help identify offenders</p> | L |
| | Football Matches governed by the FA | FA rules prohibit alcohol in grounds. Breach of FA rules could lead to disciplinary action | H | Absolute Prohibition of the taking of alcohol into the ground during ALL games governed by the FA. | L |
| Private Party Functions | Private parties selling alcohol without a sit down meal, of more than 50 people, and continuing after 6pm | These types of parties will not always be return-customers, and therefore not so accountable to the Club, as could be said for football matches. | H | <p>Require at least 2 SIA registered door supervisors at such events, or a ratio of 1:100, whichever the greater</p> <p>The SIA registered staff should be present 30 minutes before, during, and 30 minutes after the event</p> | M |
| | New Years Eve. (If a special New year | The sale of alcohol hours can often be extended and can be 'high spirited' nights leading to disorder | H | <p>Require at least 2 SIA registered door supervisors at such events, or a ratio of 1:100, whichever the greater</p> <p>The SIA registered staff should be present 30 minutes before, during, and 30 minutes after</p> | M |

| | | | | | |
|---|---|--|----------|---|----------|
| | event is put on, whether private or open to public) | | | the event | |
| | Any 18th - 25th Birthday Parties of any size | Can be an increased risk of under-age drinking or young person drinking large amounts and the associated disorder problems | H | Require at least 2 SIA registered door supervisors at such events, or a ratio of 1:100, whichever the greater The SIA registered staff should be present 30 minutes before, during, and 30 minutes after the event | M |
| Meetings/Conferences | Of any size | Can be the need for emergency attendance, recording of incident | L | Must always be a member of staff on site and if bar open manned by a duly authorised member of staff | L |
| Recreational events such as fitness sessions (aerobic etc) | Of any size | Can be the need for emergency attendance/recording of incident | L | Must always be a member of staff on site and if bar open manned by a duly authorised member of staff | L |

